

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.

Service Appeal No. 825/2024

Waqif Khan Ex- Ticketing Officer/IHC No.81 City Traffic Police,
Peshawar..... (Appellant)

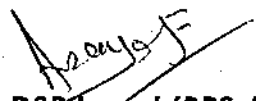
VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and
others..... (Respondents)

INDEX

S.#	Description of documents	Page
1.	Parawise Comments	01-03
2.	Affidavit	04
3.	Authority Letter	05
4.	Annexure "A" (Service record)	06-07
5.	Annexure "B" (Charge Sheet, Summary of allegation, enquiry report along-with statements & order)	08-21

Respondents Through


DSP Legal (BPS-17)
City Traffic Police, Peshawar

1

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 825/2024

Diary No. 15231

Waqif Khan EX- Ticketing Officer/IHC No.81 City Traffic Police,

Dated 28/8/24

Peshawar..... (Appellant)

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and
others..... (Respondents)

PARA-COMMENTS OF RESPONDENTS NO. 1, 2 & 3 ARE AS UNDER

Respectfully Sheweth:

PRELIMINARY OBJECTIONS.

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
3. That the appellant has not come to this Hon'able Tribunal with clean hands.
4. That the appellant has no cause of action and locus standi to file the instant appeal.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appellant has concealed the material facts from this Honorable Tribunal.
7. That the instant appeal is not maintainable in the present form.

FACTS:

1. Correct to the extent of enlistment and promotion. However, the appellant during service, proved himself as an inefficient official. As per his service record, he was awarded various punishments on accounts of misconduct. (Service Records is annexed as "A").
2. Correct, to the extent of issuance of charge sheet/summary of allegations. Appellant while posted as Ticketing Officer in City Traffic Police, Peshawar was found involved in issuing bogus/illegal challans by installing the Bluetooth printing App in his personal smart phone instead of using official challan device of City Traffic Police, Peshawar. On account of such gross misconduct, he caused great loss to the government exchequer and tarnished the image of City Traffic Police, Peshawar. In order to scrutinize the conduct of appellant proper departmental enquiry through DSP Hqrs: Traffic Zahoor Ur Rehman was conducted. During enquiry the charges against the appellant stands proved beyond any shadow of doubt. The appellant did not provide proper evidence, arguments and failed to defend himself against the allegations involving the issuance of unauthorized/bogus/illegal challans from bogus app installed in his mobile phone before the enquiry officer and respondent No. 03. Hence, after providing opportunity of personal hearing, major punishment of compulsory retirement from service was awarded to the appellant upon the recommendations of enquiry officer under the rules (copies of charge sheet, summary of allegations, enquiry report along-
with statements and order attached as annexure "B").

3. Incorrect, proper departmental enquiry under the rules was conducted against the appellant by issuing proper charge sheet, summary of allegations, while during enquiry the appellant failed to prove himself innocent.
4. Incorrect, Respondent No.03 consequent upon receipt of finding/recommendations conducted by DSP HQrs: Traffic Zahoor Ur Rehman, which reveals that the appellant is an incorrigible & corrupt head constable, and his retention in police force is not justifiable and portrays the negative image of the department. Thus, after providing the proper opportunity of personal hearing, he was awarded major punishment of compulsory retirement from service under the rules.
5. Pertains to record.
6. Pertains to this Honorable Tribunal, hence need no comments.
7. Correct to the extent of revision petition, however the appellant was heard in person by the Appellate Board and took a lenient view keeping in view his long service of more than 30-years, thus restored the original order of Compulsory Retirement from service issued by Respondent No.3 (copy of order is already annexed as "B").
8. That the orders of the Respondents are quite legal in accordance with law/rules and the instant appeal being devoid of merit is liable to be dismissed on the following grounds inter alia.


Grounds:

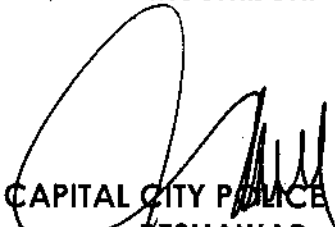
- A. Incorrect, the orders of the respondents are quite legal in accordance with rules.
- B. Incorrect, appellant was treated as per prevailing law/rules and respondents have not violated any mandatory provision of law/rules.
- C. Incorrect, the orders of respondents are quite legal and as per law/rules.
- D. Incorrect, the charges against the appellant stands proved during departmental enquiry. However, during enquiry the appellant failed to advance any plausible reasons/grounds in support of his innocence.
- E. Incorrect, reply already given vide Para "D" in grounds.
- F. Incorrect, reply already given vide Para "D" in grounds.
- G. Incorrect, reply already given vide Para "D" in grounds.
- H. Incorrect, the charges against appellant stands proved during the enquiry.
- I. Incorrect, before passing the orders proper opportunity was provided to the appellant.
- J. Incorrect, the appellant's order is quite legal and as per law/rules.

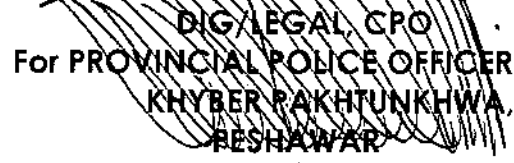
- K. The respondent No. 01 while decided the revision petition of the appellant has already taken a lenient view by keeping in view his long service of more than 30-years.
- L. That, the respondents may also be permitted to raise additional grounds during arguments/hearing of the instant appeal.

PRAYER:

In view of the above, it is therefore, requested that the Para-Wise comments of respondents may kindly be accepted and the service appeal filed by the Appellant may kindly be dismissed being meritless.


CHIEF TRAFFIC OFFICER,
PESHAWAR.
(Respondent No.3)
(SAUD KHAN)PSP,PPM
Incumbent


CAPITAL CITY POLICE OFFICER,
PESHAWAR
(Respondent No.2)
(QASIM ALI KHAN)PSP
Incumbent


DIG/LEGAL, CPO
For PROVINCIAL POLICE OFFICER
KHYBER PAKHTUNKHWA,
PESHAWAR
(Respondent No.1)
(RIZWAN MANZOOR)PSP
Incumbent

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.**

Service Appeal No. 825/2024

Waqif Khan EX- Ticketing Officer/IHC No.81 City Traffic Police, Peshawar
..... (Appellant)

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and others.
..... (Respondents)

AFFIDAVIT

I, Saud Khan, City Traffic Police, Peshawar do hereby solemnly affirm on oath that the contents of Service Appeal on behalf of respondents department are correct to the best of my knowledge and belief. Nothing has been concealed from this Honorable Tribunal. It is further stated on oath that in this appeal, this answering respondents have neither been placed ex-parte nor their defense is struck-off.



Saud Khan

19/08/24

Saud Khan
CHIEF TRAFFIC OFFICER,
PESHAWAR.
(Respondent No.3)
(SAUD KHAN)PSP, PPM
Incumbent

(5)



OFFICE OF THE
CHIEF TRAFFIC OFFICER,
PESHAWAR



☎ 091-9225361 Fax # 091-9225368

No. _____/Legal Dated Peshawar the / /2024

AUTHORITY LETTER

I, Mr. Saud Khan (PSP), Chief Traffic Officer (CTO), Peshawar do hereby Authorize Mr. Amir Sayaf, DSP Legal City Traffic Police, Peshawar to attend Service Appeal No. 825/2024 titled Waqif Khan Ali VS IGP & Others pertaining to this office in Khyber Pakhtunkhwa Service Tribunal on behalf of the undersigned.


CHIEF TRAFFIC OFFICER,
PESHAWAR.

[Faint handwritten notes and signatures]



Annexure (A)

6

EMPLOYEE BIO-DATA
Human Resource Management System
City Traffic Police, Peshawar

**PERSONAL INFORMATION**

Status (Regular/On Loan/Pay Attach)	Regular		
Category	Executive		
DDO	SSP Traffic		
Belt No	81		
Name	Waqif khan		
Father Name	Zia Khan		
Gender	Male	CNIC	1730116699744
Mobile No	03459179735	Personal No	37813
Passport No	Nil	Blood Group	
Date of Birth	08-08-1969	Religion	Islam
Maslak	Sunni	Caste	Afghan
Present Address	Gulshan Abad Matani Peshawar		
Permanent Address	Gulshan Abad Matani Peshawar		
Police Station	Mattani	District (Domicile)	Peshawar
Appointment District	Peshawar	Appointment Date	01-08-1993

**QUALIFICATION**

Qualification	Institute	Year	Remarks
Matric	Govt. High School Mattani	1992	

POSTING

Circle/Section	Sector/Sub Section	Place of Posting	Order Number	From Date	To Date	Remarks
HQrs	Ring Road	I/C Romeo-II Mobile	473-79/OSI	27-06-2023		2nd Shift
HQrs	Ring Road	I/C Romeo 3	288/OSI	24-05-2023		2nd Shift
City	Circular Road	Incharge Circular Road	1329-45/OASI	20-09-2022		1st Shift
Ring Road	Ring Road	Incharge Romeo-5	644-656/OASI	06-06-2022		1st Shift
Town	Town	NASIR BAGH UNDER PASS TOWARDS HAYATABAD	989-1011/OSI	02-09-2020		
Kohat Road	Kohat Road	MURSHAD ABA	623-36 / OASI	18-06-2020		
Cantt	VIP	INC ROMIAO 2	479-500 / OASI	15-04-2020		
Kohat Road	Ring Road	ghari qamar din pul	131-145	03-02-2020		
Cantt	VIP	PISHTAKHARA CHOWK	1275-1290	15-11-2019		

PROMOTION

From Rank	From BPS	To Rank	To BPS	Order Number	Order Date	Promotion Type
Head Constable	9	ASI	11	267	15-09-2015	Shoulder
Constable	7	Head Constable	9	1956-75/CRC	02-08-2008	Regular

TRAINING

Training Name	Institute	From	To	Result	Remarks
Intermediate	PTC Hangu	01-02-2015	31-05-2015	Pass	
Elite Course	Nowshera	03-01-2022	27-02-2022	Pass	

REWARD

Type	Details	OB Number	Date	Remarks
Reward	Granted CC Class I With Cash Reward RS 1000/- for his good Performance as observed by HQ 11 Corps		05-09-2000	

PUNISHMENT

Type	Details	OB Number	Date	Remarks
Punishment	01 day w/o pay and 01 day incentive money deducted Rs 250 fine	586	02-08-2021	punishment
Punishment	therefore each official is awarded the minor punishment as noted against their names Rs 50 fine	653	17-08-2021	minor punishment

ATTESTED

Punishment	awarded minor punishment Rs 50 fine	831	27-09-2021	punishment
Punishment	Charge From 01-day absent from duty on 15-11-2021, 01-day incentive money deducted & Rs. 250/- Fine.	1230	22-11-2021	
Punishment	one Day Absent from Duty LWO Pay	278	26-08-2017	
Punishment	one Day Absent from Duty LWO Pay	285	28-09-2017	
Punishment	Charge From 24-09-2018 one Day absent from Duty Lwo Pay	481	25-10-2018	
Punishment	01 Day Leave Without Pay and Incentive Money Deducted.	1665	28-11-2022	Lwo pay , Incentive Money.
Punishment	02 Day absent period incentive money is deducted	261	06-04-2023	Incentive Money
Punishment	01 Days absent period is warned	296	28-04-2023	warned
Punishment	01 day absent period incentive money is deducted.	577	31-07-2023	Incentive Money deducted
Punishment	He is awarded major punishment of Compulsory Retirement from Service under the khyber pakhtunkhwa police Rules 1975	956	27-10-2023	Compulsory Retirement From Service.
Punishment	03 days absent period incentive money+ basic pay is deducted.	969	01-11-2023	Lwo pay , Incentive Money.

LEAVE

Leave Type	From	To	OB Number	Date
Medical	27-11-2020	03-12-2020	694	27-11-2020
Medical	03-12-2020	09-12-2020	703	04-12-2020
Casual	26-02-2021	27-02-2021	01	26-02-2021
Medical	24-11-2020	24-11-2020	694	27-11-2020
Medical	03-12-2020	09-12-2020	703	04-12-2020
Casual	16-09-2021	17-09-2021	01	16-09-2021
Casual	30-09-2021	01-10-2021	01	30-09-2021
Casual	31-12-2021	01-01-2022	01	31-12-2021
Casual	11-08-2022	12-08-2022	01	11-08-2022
Medical	19-05-2023	21-05-2023	364	23-05-2023

FAMILY

Name	Relation	Occupation	Age	Address
Aslam khan	Brother	Farmar	35	pehshawar
Nasir khan	Brother	Farmar	32	pehshawar
Hayat khan	Brother	Farmar	30	pehshawar
Uzair khan	Son	Student	15	Peshawar
Umair khan	Son	Student	12	Pshawar

Designed & Developed by IT Wing, City Traffic Police, Peshawar.



CHARGE SHEET

Annexure (B)

8

1. WHEREAS I am satisfied that a formal enquiry as contemplated by Police Rules 1975 is necessary and expedient.

2. AND whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in Rule-3 of the aforesaid Rules.

3. Now therefore, as required by Rule 6 (1) (a) & (b) of the said Rules, I, **QAMAR HAYAT**, PSP Chief Traffic Officer, Peshawar hereby charge you **TO/IHC Waqif Khan No.81** (ASI acting charge basis) Incharge Romeo-II Mobile, under Rules 5 (4) of the Police Rules 1975 on the basis of following allegations:-

- i That you have been found issuing bogus/illegal challans by installing a printing app in your smart phone instead of using official challan device of City Traffic Police Peshawar. It has caused loss to the government treasury and also tarnished the image of City Traffic Police, Peshawar amongst the general public.
- ii. This amounts to gross misconduct on your part.

4. AND I hereby direct you further under Rule 6 (I) (b) of the said Rules to put-in written defense within 07-days of the receipt of this Charge Sheet as to why the proposed action should not taken against you and also state whether you desire to be heard in person.

5. AND in case your reply is not received within the stipulated period to the enquiry officer, it shall be presumed that you have no defense to offer and in that case, ex-parte action will be taken against you.

(QAMAR HAYAT) PSP
CHIEF TRAFFIC OFFICER,
PESHAWAR.
(Competent Authority)

No. 787 IPA,

Dated: 15/09/2023.

Copies to the:-

1. Enquiry Officer to initiate departmental proceedings against the defaulter official under Police Rules 1975.
2. TO/IHC Waqif Khan No.81 (defaulter official) to appear before the Enquiry Officer and attend the departmental proceedings as and when directed/called by the Enquiry Officer.

مذکورہ آفیسر کو ایک چارج شیٹ پیش کی گئی ہے
جو اس کی تاریخ 16-9-2023 ہے
اس کی جواب دہی کیلئے اسے مطلع کیا گیا ہے۔

16/9/2023

ENQUIRY OFFICER

DISCIPLINARY ACTION

1. **I, QAMAR HAYAT**, Chief Traffic Officer, Peshawar as competent authority, am of the opinion that you **TO/IHC Waqif Khan No.81** (ASI acting charge basis) Incharge Romeo-II Mobile, have rendered yourself liable to be proceeded against, as you have committed the following acts/omission within the meaning of section 03 of Police Rules 1975.

SUMMARY OF ALLEGATIONS

i That you have been found issuing bogus/illegal challans by installing a printing app in your smart phone instead of using official challan device of City Traffic Police Peshawar. It has caused loss to the government treasury and also tarnished the image of City Traffic Police, Peshawar amongst the general public.

ii. This amounts to gross misconduct on your part.

2. For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, an Enquiry Committee comprising of the following officer(s) is constituted:-

a. Mr. Zahoor-ur-Rehman DSP/HQrs:Traffic

b. _____

3. The enquiry committee/officer shall in accordance with the provision of the Police Rules 1975 provide reasonable opportunity of hearing to the accused officer/official and make recommendations as to punishment or any other appropriate action against the accused.

(QAMAR HAYAT) RSP
CHIEF TRAFFIC OFFICER,
PESHAWAR.
(Competent Authority)

1. Enquiry Officer to initiate departmental proceedings against the defaulter official under Police Rules 1975.
2. TO/IHC Waqif Khan No.81 (defaulter official) to appear before the Enquiry Officer and attend the departmental proceedings as and when directed/called by the Enquiry Officer.

ALIESED



(10)

**OFFICE OF THE
DEPUTY SUPERINTENDENT OF POLICE
HQRS; CITY TRAFFIC, PESHAWAR**

No. 655 /R, Dated Peshawar the 06/10/2023.

To: The Chief Traffic Officer,
Peshawar.

Subject: **DEPARTMENTAL ENQUIRY AGAINST ASI WAQIF KHAN NO. 81**
Memo:

A departmental enquiry is initiated against ASI Waqif Khan No. 81 which is marked by W/SP HQrs; City Traffic Police, Peshawar to the undersigned for departmental proceedings with the following allegations:-

SUMMARY OF ALLEGATIONS.

"That you have been found issuing bogus/illegal challans by installing a printing app in your smart phone instead of using official challan device of City Traffic Police, Peshawar. It has caused loss to the government treasury and also tarnished the image of City Traffic Police, Peshawar amongst the general public".

To scrutinize the matter, the charge sheet was served on the accused official on 16.09.2023 and directed to submit reply within stipulated time. In response he appeared & recorded his statement and also cross examined, which are as under:-

STATEMENT OF ASI WAQIF KHAN NO. 81:

He stated that he is posted as In-charge Romeo-II and is performing his duties with utmost courtesy and honesty. That he is alleged of having a printing app in his personal mobile and using an alternative to the official device, for which he has been performing his duties as a ticketing officer for last 18-years. He has performed his duty to raise the dignity of city traffic police and in almost 30 years of service, no complaint has been received against him by the high-ups and he has never taken any action that would harm his eternal life or the department financial or reputational loss. Also, before the current personal mobile, he used a simple mobile, which was unusable, so he bought the same touch mobile from the general market and whose function is not known, then how can he install such an app, which he does not know how to use. So he has no knowledge and is not familiar with the function of this app. Surely, the mentioned app will be in his mobile. However, it is also a fact that till now he has not even turned on this app in the mobile screen and for which he is ready for all kinds of consolation. Apart from this, his performance as a ticketing officer for 18-years is also sufficient to negate such allegations that till date 01.07.2023, he has issued 2667-challans and fines of Rs. 864200/- (progress report is

[Signature]

attached). Therefore, the presence of an app in his personal mobile is not a true and conclusive proof that he is wrong, nor is there any complaint from the road user that may God forbid he is involved in this type of technical theft. Therefore, the prayer is that he is not aware of this kind of baseless accusation and has not been involved in such heinous acts (statement attached).

STATEMENT OF DFC MUHAMMAD UZAIR NO.:

Stated that he is posted as Driver in Romoe-II mobile. As a driver, he remains present in the vehicle for the safety of the government vehicle. He is unaware of the bogus challan or the app as neither he has seen using the app or issuing bogus challan of In-charge waqif Khan and he is ready to give all kinds of consolation to the high-ups (statement attached).

STATEMENT OF HC DAUD ULLAH NO. 118:

Stated that he is posted as Gunner In-charge Romeo-II, as a gunner it is his responsibility to protect the In-charge and also the government vehicles. During duty hours, he is at a distance from In-charge while issuing challan. From bogus challan/bogus app, he is completely unaware about it and till date he has not seen the In-charge Waqif Khan using bogus app/challan. He is ready to satisfy the high-ups (the statement is attached).

STATEMENT OF IN-CHARGE DOCUMENT CELL MANSOOR JAMAL:

Stated that as per the directions/orders of high-ups during the checking of the official challan mobile device, two mobiles of ASI Waqif Khan were checked. In both the mobiles, one official challan mobile device distributed on ASI Waqif Khan and one his personal mobile, an app was found downloaded from Playstore, which is called Bluetooth printer. Both the mobiles were handed over to the SHO PS Traffic as per the orders of the high-ups (statement is attached).

STATEMENT OF MUHAMMAD ISHFAQ (DDIT):

Stated that during the routine checking by the DSP headquarters Traffic, two mobile phones were recovered from ASI Waqif Khan No.81, in which one was an official mobile and the other was his personal, which was brought to him for checking. Both the mobiles were found to have a Bluetooth Printer App downloaded from Playstore which is used for bogus challan (statement is attached).

FINDINGS/CONCLUSION:

During the course of inquiry, the charge sheet and summary of allegations was served on the accused official, recorded his statement

and also cross examined. It has been concluded that ASI Waqif Khan who has been performing duty as ticketing officer for about 18 years. The officers above have received complaints from the public about bogus challans that the traffic officials issue challans to the wallets which are neither received nor recorded.


In this regard, the undersigned has been directed from the high-ups to check the official mobile devices of all ticketing officers (T.Os). In compliance with the directions, the undersigned during the challan mobile device checking of the officials, on the challan mobile device checking of ASI Waqif, it was found that there was an app downloaded from play store called Bluetooth App which is used for bogus challan in which complete challan details were registered. On further checking, the same app was also found in his personal mobile phone of the accused official in which complete challan details were registered as well. Both the mobiles were seized by the In-charge Documents Cell Mansoor Jamal and handed over to the SHO Police Station Traffic as per the directions of the high-ups. Furthermore, on the examination of Deputy Director I.T Ashfaq Khan, it has been found that the said app, which is downloaded from Play Store, and is used for bogus challan, the accused official has issued a bogus challan as well.

Being a part of the disciplinary force, the image of City Traffic Police Peshawar has been tarnished in the eyes of the general public by this act of the accused official and it has caused loss to the government treasury, since the presence of bogus app in both mobiles of the accused official shows bad faith and found guilty.

RECOMMENDATIONS:

In the light of the above scenario and as per the above statements, ASI Waqif Khan No. 81 is hereby recommended for major punishment for his involvement in bogus challan/App.

Submitted please.


(ZAHOOR UR REHMAN)
DY; Superintendent of Police,
HQrs; Traffic Police, Peshawar.

TRAFFIC

بیان آزاں ASI واقف خان 81

جناب عالی!

بحوالہ چارج شیٹ نمبری 787/PA مورخہ 15.09.2023 معروض خدمت ہوں کہ من سائل بحیثیت انچارج رومیو-2 تعینات ہوں اور اپنی فرائض انتہائی خوش اسلوبی اور ایمانداری کے ساتھ انجام دے رہا ہوں۔ یہ کہ سائل پر ذاتی موبائل میں پرنٹنگ ایپ کی موجودگی اور سرکاری ڈیوائس کے متبادل استعمال کرنے کا الزام ہے جسکی بابت عرض ہیکہ تقریباً 18 سال سے ٹیکننگ آفیسر کے حیثیت سے فرائض کی انجام دہی کر رہا ہوں۔ ہمیشہ اپنی ڈیوٹی سٹی ٹریفک پولیس کے وقار اور عزت کو بلند کرنے کیلئے ڈیوٹی انجام دی ہے اور تقریباً 30 سالہ نوکری میں من سائل کے خلاف تا حال کسی قسم کی شکایت وغیرہ افسران بالا صاحبان کو موصول نہیں ہوئی ہے اور کبھی بھی ایسے افعال کے جانب رخ اختیار نہیں کی ہے جس سے سائل کی ابدی زندگی یا ادارے کو مالی یا ساکھ کی نقصان ہو۔ علاوہ ازیں موجودہ ذاتی موبائل سے پہلے سادہ موبائل استعمال کرتا تھا جو کہ ناقابل استعمال ہونے پر من سائل نے عام مارکیٹ سے یہی ٹچ موبائل خریدی اور جس کے فنکشن کے استعمال نابلد ہوں پھر کیونکر من سائل ایسا کوئی ایپ انسٹال کرونگا جس کے استعمال کے بابت ناتو من سائل علم رکھتا ہے اور نا اس نا اس ایپ کی فنکشن سے واقفیت ہے۔ بیشک مذکورہ ایپ میرے موبائل میں ہوگی۔ تاہم یہ بھی حقیقت ہے کہ ابھی تک سائل نے اس ایپ کو موبائل سکرین میں ON بھی نہیں کیا ہے اور جس کیلئے سائل ہر قسم کی تسلی کیلئے تیار ہے۔ علاوہ ازیں سائل بحیثیت ٹیکننگ آفیسر 18 سال سے کارکردگی بھی اس قسم کی الزامات کی نفی کیلئے کافی ہے جو کہ مورخہ 01.07.2023 تا حال من سائل نے 2667 چالان اور 864200/- روپے جرمانہ مختلف خلاف ورزیوں کی صورت میں روڈ استعمال کنندہ گان سے وصول کر کے سرکاری خزانے میں جمع کی (پراگرس رپورٹ ہمراہ لف ہے)۔ لہذا کسی ایپ کا من سائل کے ذاتی موبائل میں موجودگی میرے غلط ہونے کا کوئی سچا اور پکا دلیل نہیں ہے اور نا ہی روڈ استعمال کنندہ گان کی طرف سے اس قسم کی شکایت ہوئی جو کہ سائل کا خدا نا کرے اس قسم کی ٹیکنیکل چوری میں ملوث ہونے کا باعث ہو۔

لہذا استدعا ہیکہ اس قسم کی بے سرو پاں الزام کے بابت من سائل نا واقفیت رکھتا ہے اور نا ایسے گھناؤنے افعال میں ملوث رہا ہوں۔ استدعا ہیکہ من سائل کے خلاف جاری کردہ چارج شیٹ کو داخل دفتر کیا جائے۔

TO/ASI واقف خان 81

Alleged

D.S.P TRAFFIC
HEADQUARTERS

س۔ آ۔ آ۔ کس سال ۷ بھرتی شدہ ہے ؟
ج۔ ۱۹۹۳ کو بھرتی ہوا ہوں

س۔ آ۔ آ۔ کی تعلیم کتنی ہے ؟
ج۔ میٹرک پاس ہوں

س۔ کیا آ۔ آ۔ کو ٹچ موبائل استعمال کرنے پر عبور ہے ؟

ج۔ من سائل نے ابھی تک سادہ موبائل استعمال کرتا تھا لیکن ذاتی موبائل سے عام مارکیٹ سے ٹچ موبائل خریدی ہے جو کہ تا حال اسکے فنکشن پر واقفیت نہیں ہے۔

ALLEGED

D.S.P TRAFFIC
Headquarters Peshawar
6/10/2023

Amended

RECEIVED

میں نے اس کی تصدیق کی ہے اور اس میں کوئی تبدیلی نہیں کی ہے۔
میں نے اس کی تصدیق کی ہے اور اس میں کوئی تبدیلی نہیں کی ہے۔

81/10/2023 ASI

میں نے اس کی تصدیق کی ہے اور اس میں کوئی تبدیلی نہیں کی ہے۔
میں نے اس کی تصدیق کی ہے اور اس میں کوئی تبدیلی نہیں کی ہے۔


میں نے اس کی تصدیق کی ہے اور اس میں کوئی تبدیلی نہیں کی ہے۔

میں نے اس کی تصدیق کی ہے اور اس میں کوئی تبدیلی نہیں کی ہے۔
میں نے اس کی تصدیق کی ہے اور اس میں کوئی تبدیلی نہیں کی ہے۔

بیان اذان جناب DDIT صاحب ٹریفک پشاور۔

بحوالہ انکوائری TO واقف خان معروض خدمت ہوں کہ دوران جنرل چیکنگ از طرف ڈی۔ ایس پی ہیڈ کوارٹرز دو عدد موبائل فون مذکورہ TO سے برآمد کئے گئے، جس میں ایک سرکاری موبائل اور دوسرا TO کا ذاتی موبائل تھا۔ جسکو چیکنگ کیلئے میرے پاس لائے گئے۔
دونوں موبائلز میں Play Store سے ایک ایپ (Bluetooth Print) ڈاؤن لوڈ شدہ موجود پایا گیا۔ جس کو بوجس چالان کے لیے استعمال کیا جاتا ہے۔

یہی میرا بیان ہے۔


8/9/23.
محمد اشفاق ڈپٹی ڈائریکٹر ایٹ سٹی ٹریفک پولیس پشاور۔

Attested.



D.S.P TRAFFIC
Headquarters Peshawar



TRAFFIC

D.S.P TRAFFIC
Headquarters Peshawar

[Signature]

Alleged

- درجہ II - ڈی سی ڈی

[Signature]

جو پیشکش کی گئی ہے۔

جس میں ایک ڈی سی ڈی شامل ہے جس کی شناخت

کے ذریعے کی جا رہی ہے۔ اس کے بارے میں

میں کوئی اطلاع نہیں ہے۔

اس کے علاوہ اس کے بارے میں کوئی

تعمیراتی کام نہیں ہو رہا ہے۔

اس کے بارے میں کوئی اطلاع نہیں ہے۔

(16)

II - ڈی سی ڈی کے بارے میں

بیانی ہوں کہ میں ہمیشہ گنر روہو۔ II ایجنج لکھا گئے لوگ

ہوں۔ چونکہ میں ہمیشہ گنر مسیہی بہ زلفہ داری ہے۔ کہ ۷

لہر دو روہو II موہانی کی حفاظت کرو۔ ۸ لہر دو روہو II

موہانی لہر ۷ کی مسکوڑی (ٹاھوں۔ لہر ۷ دو روہو II جب جان

کڑا ہے۔ تو میں آس کے فائلے ۸ بیوٹاھوں۔ پوگس جان لہر پوگس

ادب کے باب میں سائنس کے طور پر لہ علم ہوں۔ لہر نہ آج تک میں نے

۷ دو روہو II آٹھ واقف خان کو پوگس جان کرنے بیوٹے دیکھا ہے۔ لہر

میں آٹھ سال کو یہ ہم نسلی کرنے کے بیوٹا ہوں۔ بس یہی ہم بیان

ہے۔ جو لکھنا ہم مہنی ہے۔

D. Allah

HC داؤد اللہ 118

Attested

D.S.P TRAFFIC
Headquarters Peshawar

Handwritten text or stamp, partially illegible.


بیان اوان ایجنز ڈیویژن

جی۔ عالی

حوالہ ایجنز کے واقعہ خان معروض حضرت سون کے
 جسٹس ایگلم ایجنز میں دوران جسٹس سرکاری وارڈ میں
 از طرف ایجنز میں دوران معروض کو جسٹس میں
 دوران معروض سرکاری طور پر دوران جسٹس میں
 دوران میں معروض میں play store میں جسٹس میں
 دوران کوڈ میں جسٹس میں Bluetooth میں جسٹس میں
 دوران معروض کو جسٹس ایگلم ایجنز حوالہ جسٹس میں
 جسٹس میں جسٹس میں جسٹس میں

جی۔ عالی
 جسٹس ایگلم ایجنز ڈیویژن
 20/9/2023

Attested


 D.S.P TRAFFIC
 Headquarters Peshawar

ORDER

1. This office will dispose off formal departmental inquiry against TO/IHC Waqif Khan No.3294/81-T, who was issued Charge Sheet alongwith summary of allegations Vide No.787/PA, dated 15.09.2023 on the charge that he has been found issuing bogus/illegal challans by installing a printing app in his smart phone instead of using official challan device of City Traffic Police Peshawar. It has caused loss to the government treasury and also tarnished the image of City Traffic Police, Peshawar amongst the general public.

2. Mr. Zahoor-ur-Rehman, DSP/HQrs; Traffic Peshawar was appointed as the Enquiry Officer, who carried out a detailed inquiry and submitted his report stating therein that the delinquent official has issued bogus/illegal challans from bogus app and caused loss to the government treasury. The accused official shows bad faith and found guilty. He was called in his office and heard in person regarding allegations levelled against him but he could not provide proper arguments & failed to defend himself and involved in issuance of un-authorized/bogus/illegal challans from bogus app installed in his mobile phone. The inquiry file was thoroughly examined & he is recommended for awarding of major punishment to him.

3. Keeping in view of the above facts, the undersigned arrived to the conclusion that he is an incorrigible & corrupt Head Constable. His retention in police force is not justifiable & will portray a negative image of the department. The allegations levelled against him stand proved beyond any shadow of doubts. Therefore, he is awarded major punishment of **Compulsory Retirement from Service** under the Khyber Pakhtunkhwa Police Rules 1975.

Order announced.

O.B No. 956
Date. 27-10-2023


(QAMAR HAYAT) PSP
CHIEF TRAFFIC OFFICER,
PESHAWAR.

No. 1071-79/PA, Dated Peshawar the 27/10/2023.

Copies for necessary action to the:-

1. Capital City Police Officer, Peshawar for favour of information.
2. SP/HQrs; City Traffic Police, Peshawar.
3. D.D.I.T, City Traffic Police, Peshawar.
4. DSP/HQrs: City Traffic Police, Peshawar.
5. SRC-I (along-with complete enquiry file consisting of **13**-pages)
6. Accountant, City Traffic Police, Peshawar.
7. RI/MASI, City Traffic Police, Peshawar.
8. OSI/Reader, City Traffic Police, Peshawar.
9. Official concerned.

Handwritten signature or stamp, possibly "QAMAR HAYAT"



A/ (28)

CHIEF TRAFFIC OFFICER,
PESHAWAR
Diary No. 3447
26/12/2023

OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR

Phone No. 091-9210989 Fax: No. 091-9212597

20

ORDER.

This order will dispose of the departmental appeal preferred by Ex-IHC Waqif Khan No. 3294/81 who was awarded the major punishment of "compulsory retirement from service" under PR-1975 (amended-2014) by Chief Traffic Officer, Peshawar vide order No. 1071-79/PA dated 27.10.2023.

2- Brief facts leading to the instant appeal are that the defaulter TO/IHC was proceeded against departmentally on the charges that he was found issuing bogus/illegal challans by installing a printing app in his smart phone instead of using official challan device of City Traffic Police, Peshawar which caused loss to Government treasury.

3- He was issued Charge Sheet and Summary of Allegations by Chief Traffic Officer Peshawar. DSP/IQrs: City Traffic Police, Peshawar was appointed as Enquiry Officer to scrutinize the conduct of the accused official. The Enquiry Officer after conducting departmental enquiry submitted his findings in which the accused official was recommended for major punishment. The competent authority in light of the findings of the Enquiry Officer awarded him the major punishment of compulsory retirement from service.

4- He was heard in person in Orderly Room. During personal hearing, he was given an opportunity to prove his innocence. However, he failed to submit any plausible explanation in his defense. Therefore, his appeal for setting aside the punishment awarded to him by Chief Traffic Officer, Peshawar vide order No. 1071-79/PA, dated 27.10.2023 is hereby converted into "dismissal from service".

"Order is announced"

CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 4686-89 /PA/CCP,

dated Peshawar the 19 / 12/2023

PO/OASI/SRC-I

Copies for information and necessary action to the:-

1. Chief Traffic Officer Peshawar along with complete enquiry file.
2. SP/IQrs: City Traffic Police Peshawar
3. Pay Officer City Traffic Police Peshawar.
4. Official concerned.

CHIEF TRAFFIC OFFICER,
PESHAWAR

C.T.O.A
26/12/23

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

21

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-IHC Waqif Khan No. 81. The applicant received a major punishment of Compulsory Retirement from service by Chief Traffic Officer vide Order Endst: No. 1071-79/PA, dated 27-10-2023, on the allegation that he while proceeded against essentially on the charges that he was found issuing bogus/illegal challans by installing a printing app on smart phone instead of using official challan device of City Traffic Police, Peshawar which caused loss to Government treasury.

The Appellate Authority i.e. CCPO converted his punishment of Compulsory Retirement into dismissal from service vide Order Endst: No. 4686-89/PA/CCP, dated 19.12.2023.

Meeting of Appellate Board was held on 09.05.2024 wherein petitioner was heard in person. The applicant contended that I recently switched to usage of Smart Phone & had no idea how come he installed the alleged app.

The applicant was heard in person. The Board rejected his revision petition for reinstatement in service. However, keeping in view of his long service of more than 30 years, the Board recommended that the original order of **Compulsory Retirement** from Service is hereby restored.

Sd/-

AWAL KHAN, PSP

Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. SI/ 1232-36 /24, dated Peshawar, the 17-05-2024.

Copy of the above is forwarded to the:

1. Capital City Police Officer Peshawar. Enquiry File (01) of the above named Ex-IHC received vide your office memo: No. 1421/CRC, dated 19.01.2024 is returned herewith for your office record.
2. Chief Traffic Officer, Peshawar. Two Service Books, One Service Roll received vide your office memo: No.583/SRC-I, dated 22.02.2024 of the above named Ex-IHC received is returned herewith for your office record.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl; IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.

(SONIA SIAMROZE KHAN)
PSP

AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.