FORM OF ORDER SHEET

Court of_____

•• 1118/2024

	Арр	eal No 1118/2024
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
• -	- <u></u>	· · · · · · · · · · · · · · · · · · ·
1	08/08/2024	The appeal of Mr: Abdul Aziz Khan resubmitted
		today by Mian Muhammad Imran Advocate. It is fixed for
		preliminary hearing before Single Bench at Peshawar on
		12/08.2024. Parcha Peshi given to counsel for the appellant.
	•	By the order of Chairman
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The appeal of Mr. Abdul Aziz Khan received today i.e on 06.08.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 3 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- Address of appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.

3- Annexure-N of the appeal is illegible be replaced by legible/better one.

520 /Inst./2024/KPST, Νo

___/2024.

OFFICE ASISTANT

SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mian Muhammad Imran Adv. High Coupt at Peshawar. Sir, Respected Sir, defi

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BEFORE THE WORTHY KHYBER PAKHTUNKHWA SERVICE TRIBUNAL **PESHAWAR** 5

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1119 Service Appeal No. /2024

Abdul Aziz Khan S/O Abdul Ghani R/O Mohallah Shaheed Abad, Bara Gate, Peshawar

VS

Inspector General of Police Et. Al.

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05.	Copy of Extracts of Register 19 & Recovery Memo	D&E	12-13C 14-25
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(Mian Muhammad Imran) Advocate High Court BC-13-4213 0333-9577770 0333-9274073

Through

BEFORE THE WORTHY KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

1118 /2024 Service Appeal No.

<u>Abdul Aziz Khan</u> S/O Abdul Ghani R/O Mohallah Shaheed Abad, Bara Gate, Peshawar

.....Appellant

VS

- 1. Inspector General of Police (IGP), Khyber Pakhtunkhwa, Peshawar
- 2. Capital City Police Officer (CCPO), Peshawar

APPEAL U/S 04 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED: 26/03/2024 WHEREBY THE APPELLANT HAS BEEN DISMISSED FROM SERVICE AGAINST WHICH DEPARTMENTAL APPEAL WAS DULY FILED VIDE DATED: 16/04/2024 WHICH REMAINED HEEDLESS & ALSO TO SET-ASIDE THE SAID IMPUGNED ORDER OF DISMISSAL AS WELL AS ANY OTHER ORDER, NOT COMMUNICATED TO THE APPELLANT, BUT DETRIMENTAL TO HIS INTEREST AND TO REINSTATE THE APPELLANT WITH ALL BACK-BENEFITS

The Appellant is pleased to beseech before this Honorable Tribunal as under;

- 1. That the Appellant got appointed as "Probationer Assistant Sub-Inspector" (PASI) (BPS-09) in the "Khyber Pakhtunkhwa Police" on 19/02/2017 on the recommendation of the "Khyber Pakhtunkhwa Public Service Commission". <u>(Copy of</u> Appointment Order is attached as F/A)
- 2. That after his appointment, the Appellant started working with profound sedulous approach and completed his basic trainings successfully followed by A, B, C & D courses as well as elite course consisting of 06 months.

BEFORE THE WORTHY KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No.____/2024

<u>Abdul Aziz Khan</u> (Ex-Sub Inspector) Khyber Pakhtunkhwa Police S/O Abdul Ghani R/O Mohallah Shaheed Abad, Bara Gate, Peshawar

<u>VS</u>...

1. Inspector General of Police (IGP), Khyber Pakhtunkhwa, Peshawar

2. Capital City Police Officer (CCPO), Peshawar

.....Respondents

APPEAL U/S 04 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED: 26/03/2024 WHEREBY THE APPELLANT HAS BEEN DISMISSED FROM SERVICE AGAINST WHICH DEPARTMENTAL APPEAL WAS DULY FILED VIDE DATED: 16/04/2024 WHICH REMAINED HEEDLESS & ALSO TO SET-ASIDE THE SAID IMPUGNED ORDER OF DISMISSAL AS WELL AS ANY OTHER ORDER, NOT COMMUNICATED TO THE APPELLANT, BUT DETRIMENTAL TO HIS INTEREST AND TO REINSTATE THE APPELLANT WITH ALL BACK-BENEFITS

The Appellant is pleased to beseech before this Honorable Tribunal as under;

- 1. That the Appellant got appointed as "Probationer Assistant Sub-Inspector" (PASI) (BPS-09) in the "Khyber Pakhtunkhwa Police" on 19/02/2017 on the recommendation of the "Khyber Pakhtunkhwa Public Service Commission". (Copy of Appointment Order is attached as F/A)
- 2. That after his appointment, the Appellant started working with profound sedulous approach and completed his basic trainings successfully followed by A, B, C & D courses as well as elite course consisting of 06 months.

- 2
- 3. That thereafter, the Appellant was rendered confirmed and his name was duly incorporated in the E-List. Similarly, he was promoted to the post of "Sub-Inspector" (SI). <u>(Copy of Promotion Order is attached as F/B)</u>
- 4. That due to his outstanding and pain-staking efforts in the department, the Appellant was posted as "Station House Officer" (SHO), Police Station *Gulberg*, Peshawar.
- 5. That it is indispensable to bring into the notice of this Honorable Court that being "SHO" of the Police Station *Gulberg* Peshawar, the Appellant registered an FIR No. 1100 Dated: 12/12/2023 U/S 9-D CNSA, 15AA, & 419 & 420 PPC against some unknown persons regarding recovery of *Opium*, *Heroine & Charas* which was, in fact, found in a vehicle (RIVO-Toyota) standing/parked in the jurisdiction of *Gulberg* Police Station Peshawar. (Copy of FIR is attached as F/C)
- 6. That after registration of the said FIR, the contraband/property was properly sealed and was handed-over to the "Acting Muharar" (Rashid Khan) of the Police Station concerned and the samples were duly sent for analysis to FSL. <u>(Copy of Extracts of Register 19 & Recovery Memo is attached as</u> F/D & F/E)
- 7. That the investigation was entrusted to the Investigation Officer of the investigation wing, who duly conducted and carried out investigation in the aforesaid criminal case.
- 8. That the stroke of misfortune hit the Appellant when on 16/01/2024, the Respondent No. 02 (CCPO) visited the "Gulberg Police Station, Peshawar" and found the recovered articles in the Police Station under the custody of one "Aziz ur Rehman" (Moharrar) who got posted on 02/01/2024 by replacing "Rashid Khan" (Head Constable/Additional Moharrar). On the very next day, SSP Investigation was directed to conduct inquiry which he was carried out and an FIR No. 50/2024 was registered against the Appellant and two other employees on 29/01/2024 qua changing & replacing of the recovered contrabands based on the said inquiry. It is also indispensable to submit that the trial in the same FIR is still under-way. (Copy of CFM, Inquiry Conducted by SSP Investigation & FIR No. 50 is attached as F/F, F/G & F/H respectively)

- 9. That later on, the Appellant was served with a "Charge Sheet & Statement of Allegations" on 30/01/2024 and inquiry was initiated which was entrusted to the Superintendent of Police (SP) Headquarters, Peshawar. <u>(Copy of the Charge Sheet &</u> <u>Statement of Allegations is attached as F/I & F/J</u>)
- 10. That after receiving the charge sheet & statement of allegations, the Appellant submitted his written defense and claimed to be innocent and rejected all the allegations leveled against him. (Copy of Reply is attached as F/K)
- 11. That after conduction of inquiry, the Appellant was dismissed from service on 26/03/2024. <u>(Copy of Dismissal Order is attached as F/L)</u>
- 12.That feeling badly peeved, the Appellant submitted his departmental appeal on 16/04/2024 but despite the lapse of statutory period of 03 months, no heed was paid. <u>(Copy of Departmental Appeal is attached as F/M)</u>
- **13.**That the Appellant now approaches this Honorable Tribunal on the following grounds *inter-alia*;

GROUNDS:

- A. That the impugned dismissal order Dated: 26/03/2024 is against the law, rules and also tantamount to violate the fundamental rights of the Appellant.
- B. That it is a fact that to conduct inquiry is a delicate phenomenon where each and every facet is required to be seen and considered i.e. show-cause notice, charge sheet statement of allegation, opportunity to cross examine the witnesses, final show-cause etc. In the instant case, the inquiry has altogether been conducted in absolute disregard given to the mentioned prerequisites. Thus, the so-called inquiry proceedings are tainted with illegalities and gross irregularities.
- C. That in order to dig out facts and circumstances, it is sine qua non to carry out a full fledge detailed regular inquiry but not formal one. In the instant case, no regular comprehensive inquiry has been conducted,

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which is no doubt, against the mandate of law and rules. Apart from it, in the matters, which result in punitive punishment/major punishment, regular inquiry is indispensable.

- D. That even the Appellant has not been given the inquiry findings and proceedings despite the fact that he also applied to obtain the same. <u>(Copy of the Application is attached as F/N)</u>
- E. That it is legit to bring into the notice of this Honorable Tribunal that the impugned punishment awarded to the Appellant is certainly grave and severe which is not commensurate with the allegations leveled against the Appellant. Hence, the Appellant being at such green stage of his career, faced dismissal which has sabotaged his entire career and life.
- F. That all the allegations leveled in the "statement of allegations" carry no weight at all because neither the Appellant was entrusted to conduct investigation in the aforesaid Case FIR No. 1100 because being a complainant in the said case, he cannot investigate as the judicial cliché goes right that "no one can be a judge in his own cause or on his own". Similarly, the case property was evidently handed-over to the then "Additional Moharrar", which was his whole and sole duty/responsibility. Furthermore, even after assuming charge by the regular "Moharrar" in place of the "Additional Moharrar, the said articles were duly handed-over to him. Besides, selling and replacing the contraband has never been carried out by the Appellant which is even crystalline from the record. As per Police Rules, the duty and responsibility of the SHO as well as the Moharrar has been elaborated in detail, and by giving a bird's eye view, the custodian of any recovered articles, after receiving by the "Moharrar", he has to enter the same in the relevant registers and to place it in the relevant place/Malkhana. Regarding the SOP, the same has not been properly and thoroughly circulated. Thus, the Appellant is innocent and illegally been dismissed from his service.

G. That it is also an established probity that to conduct inquiry via serving questionnaires is against the norms

meant for inquiry proceedings. Hence, all the process is tainted with illegality and spitefulness.

H. That in fact, nothing has been extracted regarding involvement of the Appellant in any sort of 'contra legam' act but still he has been 'put at the altar' without any cogent reason and justification. It is no doubt, not appealable to a prudent mind that a police officer when recovers such a huge quantity of narcotics and informs his high ups regarding the same, and even unwraps all the contraband in front of them, how he would dare to intermingle/sell/replace the said contraband even knowing all the ramifications? Still such allegations have been leveled which are nothing but beating about the bushes.

I. That any <u>other</u> ground can be raised at the time of arguments.

PRAYER:

In light of the foregoing submissions, it is therefore, most humbly prayed that on acceptance of the instant service appeal, the impugned dismissal order Dated: 26/03/2024 may kindly be set-aside and the Appellant may kindly be reinstated into service with all back-benefits.

Through

(Mian Muhammad Imran) Advocate High Court BC-13-4213 0333-9577770 033309274073

pheliant

Affidavit:

It is stated on oath the contents are true and correct and nothing has been concealed.

eponent







OFFICE OF THE CAPITAL CITY POLICE OFFICER. FESHAWAR.

Internet Ma. 991-9210641 Fax No. 591-9212597

POLICE SEPTE:

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CCP. PESHAMAR

EON PESILICATION IN THE KHYBER PAKHTUNKHWA, POLICE GAZETTE PART-II. OHOERS BY THE CAPITAL CITY POLICE SFITCER KHYBER PAKHTUNKHWA, PESHAWAB.

MODULE AND AND

Dates 191 2 12017. ,

AC-4, APPOINTMENT AS PRODATIONER ASSISTANT SUD-INSPECTORS:-Consequent upon recommendation of Khyter Pakitaukhwa, Public Service Commission Peshawar vide icities No. KPK.PSC-EXAM-2016/002330, dated 01-02-2017, Govi: of Khyber Pakhunkhma Home & TAs Department licitor Ria. 50 (Public)/#HD/3-22/2014//Vol-VI, dated 06-02-2017 and approved by the Inspirate Compai of Police Kingder PailMunither, Fusinasier while issuer him. 291-37/E-111, dated 13-02-2017, the following candidates are knewly appointed as PASIs(BPS-09) against the 25% allotted shares for direct recruitment, and 10% allotted shares for female in Capital City Police, Pestawar on a three year probationer period subject to Medical Filness, Verilication of Antecedent and working of the most substituted in the concerned floatiguities by under the relevant rules ionsi con sunibasi amannen:--

They are allotted CCP, Peshawar Numbers noted against each.

	Alaane & Asther names	CCP, Number
¥	Swed All Alabers she Swed Shukid Hugssin Shuk	1 5 of 5 of 100
2.	Afaq Ahmad s/o Yousaf	150/₽
3.	Arbab Taj Haider s/o Arbab Harat Ulat	151/P
4.	Ajmusi Hayat sto Samilaat Khan	153/P
<u>5</u> .		154/P
	And Kham also Faranti usi-Qim	155/P
6.	Muhammad Akif Anjum s/o Muhammad Ibrar Anjum	156/P
7	Faheem Shah s/o Ajmal Shah	157/P
¥.	Abalul Artz s/o Ababul Ghaná	
¥.	Muchassin Equal s/2 Balanci Gal	158/P
100,	lanakhado Altava s/o Mulhannvad Altag	159/P
11.	Agib Khan s/o Khan Muhammad	160/7
12.	Asad Ullah s/o Barkat Ali Sher	161/P
13.	•	162/P
	Muhamonad Usiman Khas 5/0 Muhammod Zable Khas	163/P
14L.	Andresh Wajimar 1/2 Khadim Shah	164/p
15.	Shehzad Ali Khan s/o Akbar Ali Khan	165/P
16.	Muhammad Subhan Uliah s/o Khan Badshah	
7.	Muclassir Hayat s/o Size) ul Hay	166/P
19 .	Age Kingan s// Nowath Khing	167/P
·9.	Facts Amits 5/0 Picenily What	153/7
70. ľ	Mahammad Saddam Riaz 5/0 Mahammad Riaz	169/P
21	Services and the second states	170/2
	Ramos Lifesh Sto Multiller Multimed	171/2
	Tariq Maan s/o Shabbaar Maan	
		172/P



31,	Alia Nawab d/o Nawab Ali Khan	181/2
	Ares): Equesi s/m Alathaseument Erchrol	120/7 -
50).		179/P
29.	Kidayet Wilzib \$/0 Alzer Wilzia	
2S.	Syed All Invan s/o Syed Islam Shah	178/2
	Ozair Khan s/o Zain-ut-Abkleen	177/P.
27.	Construct sand yo munanimad Rafiq	- <u>1</u> 76/P
Z6.	Huhammad Ishtiaq s/o Muhammad Rafiq	175/2
25.	August All Kitza: S/m Llingat All	
24	Sohnen Laires wa Laires Kinan	174/₽
23.	Hudazononaci Belai sio Fazie Sueman	- 173/P

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CAPITAL CITY POLICE OFFICER, PESHAWAR

Copy of above is forwarded for information and necessary action to the-

- Inspector General of Police Khyber Pakhtunkhwa, Peshawar w/r to his 1, memo: No. 891-97/E-W, dated 13-02-2017.
- ž Addit Inspector General of Police Insestigation, Khyber Pakhtunkinva, Peshawar with 2 spore copies for publication in the LPK Police Gazette

Deputy Inspector General of Police Hors: Khyber Pakhtunkhwa, Peshawar 4

Director Examination XFX Public Service Commission.

Section Office/Folice/ Gove: LFK, House & TAs Department Peshawar. £.

SSP/Operation, Peshawar. 6.

7. SSP/investigation, Peskawar.

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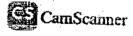
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EC-II, Their applications alongwith other relevant documents are sent herewith for placing in their Character Roll/Service Roll. 10. PO, AS & Fauji Missal

Officials concernat. <u>Ti</u>

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POLICE DEPTT:

CCP, PESHAWAR

FOR PUBLICATION IN THE KHYBER PAKIITUNKHWA, POLICE GAZETTE PART-IL ORDERS BY THE CAPITAL CITY POLICE OFFICER KHYBER PAKHTUNKHWA PESHAWAR.

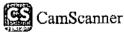
NOTIFICATION

Dated 16/01/2024

No. <u>1163</u> /EC-1, PROMOTION TO THE RANK OF SIS:- As per the recommendations of Departmental Promotion Committee meeting, held on 29-12-2023, duly approved by the competent authority, the following "E" list Assistant Sub-Inspectors of Capital City Police Peshawar are hereby promoted to the rank of Sub-Inspector BPS-14 on regular basis in light of Standing Order No. 03/2022 and CPO letters No. CPO/CPB/63 & 64, dated 13.02.2023, against the vacant posts with immediate effect. They shall remain on probation for two years in terms of Police Rules 13-18.

S.No.	Rank, Name & No	Present Posting	Decision
1.	ASI Muhammad Javed No. 360/P	CCP, Peshawar	Promoted to the rank of SI on regular basis.
2.	ASI Tariq Jamal No.149/P	CCP, Peshawar	-do-
3.	ASI Sycd Ali Abbas No. 150/P	CCP, Peshawar	-do-
4.	ASI Arbab Taj Haider No. 153/P	CCP, Peshawar	-do-
5.	ASI Ajmal Hayat No. 154/P	CCP, Peshawar	-do-
6.	ASI Muhammad Akif Anjum No. 156/P	CCP, Peshawar	-do-
7.	ASI Faheem Shah No. 157/P	CCP, Peshawar	-do-
8.	ASI Abdul Aziz No. 158/P	CCP, Peshawar	-do-
9.	ASI Mudassir Iqbal No. 159/P	CCP, Peshawar	-do-
10,	ASI Aqib Khan No. 161/P	CCP, Peshawar	-do-
11.	ASI Asad Uliah No. 162/P	CCP, Peshawar	-da-
12.	ASI Muhammad Usman Khan No. 163/P	CCP, Peshawar	-do-
13,	ASI Aadarsh Majmar No. 164/P	CCP, Peshawar	-do-
14.	ASI Mudasir Hayat No. 167/P	CCP, Peshawar	-do-
15.	ASI Muhammad Saddam Riaz No. 170/P	CCP, Peshawar	-do-
16.	ASI Rizwan Uilah No. 171/P	CCP, Peshawar	-do-
17.	ASI Tariq Ullah No. 172/P	CCP, Peshawar	-do-
18.	ASI Muhammad Bilal No. 173/P	CCP, Peshawar	-do-
19.	ASI Salman Latif No. 174/P	Elite Force	-do-
20.	ASI Asghar Ali Khan No. 175/P	CCP, Peshawar	-do-
21.	ASI Muhammad Ishtiaq No. 176/P	IT Branch CPO	-do-
22,	ASI Ozair Khan No. 177/P	PTS Shakas	-do-
23.	ASI Fazal-e-Maula No. 391/P	CCP, Peshawar	-do-
24.	ASI Ihsan Shah No 392/P	CCP, Peshawar	-do-
25,	ASI RizwanUllah No.393/P	CCP, Peshawar	-do-
26.	ASI Muhammad Nacem No.394/I	CPC Peshawar	-do-

Page 1 of 3



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27.	ASI Sajjad Anwar No.397/P	Special Branch	Promoted to the rank of SI on regular basis.
28.	ASI Ali Badshah No.398/P	CCP, Peshawar	-do-
29.	ASI Tahir Khao No. 403/P	CCP, Peshawar	-do-
30.	ASI Yahya Jan No.404/P	Special Branch	-do-
31.	ASI Ali Haider No.406/P	City Traffic Pesh:	-do-
32.	ASI Habib Shah No.408/P	CCP, Peshawar	-do-
33.	ASI Ishtiaq Ahmed No. 410/P	On loan NAB	-do-
34.	ASI Rahim Ullah No. 412/P	CCP, Peshawar	-do-
35.	ASI BakhtKaram No.413/P	City Traffic Pesh:	-do-
36.	ASI Mashood Aluned No. 415/P	City Traffic Pesh:	-do-
37.	ASI Pir Wali Shah No.419/P	CCP, Peshawar	-do-
38.	ASI Zulfigar Ali Shah No.420/P	CCP, Peshawar	-do-
39.	ASI Muhammad Imran No.422/P	CCP, Peshawar	-do-
40.	ASI Mujeeb-ur-Rehman No.423/P	City Traffic Pesh:	-do-
41.	ASI Taj Nabi No. 424/P	City Traffic Pesh:	-do-
42.	ASI Akhtar Gul No. 426/P	Elite Force	-do-
43.	ASI Muhammad Ibrahim 427/P	City Traffic Pesh:	-do-
44,	ASI Farooq Shah No.431/P	CCP, Peshawar	-do-
45.	ASI Khalid Usman No. 13/P	CCP, Peshawar	-do-
46.	ASI Sohrab Khan No. 14/P	CCP, Peshawar	-do-
47.	ASI Muhammad Arshid No. 15/P	CCP, Peshawar	-do-
48.	ASI Asad Khan No. 16/P	CGP, Peshawar	-do-
49.	ASI Azmat Khan No. 09/P	CCP, Peshawar	-do-
50.	ASI Shah Saud No. 216/P	Legal Branch CPO	-do-
51.	ASI Irshad Umar No. 227/P	CCP, Peshawar	-do-
52.	ASI Shahzaib No. 21/P	CCP, Peshawar	-do-
53.	ASI Muhammad Riaz No. 22/P	CCP, Peshawar	-do-
54.	ASI Mir Hassan Shah No. 24/P	CCP, Peshawar	-do-
55.	ASI NacemUllah No. 25/P	CCP, Peshawar	-do-

CAPITAL CITY POLICE OFFICER, PESHAWAR

No. 1164-82

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/EC-1, dated Peshawar the 16/01/2024.

Copy of above is forwarded for information and necessary action to the:-

- Additional Inspectors General of Police, Investigation, Special Branch & Elite Force, Peshawar.
- Deputy Inspectors General of Police, HQrs, I.T & Legal, Khyber Pakhtunkhwa, at CPO Peshawar

Page 2 of 3

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- Commandant, CPC, Peshawar.
 Senior Superintendents of Police, Operations, Investigation & Coordination CCP, Peshawar
 Chief Traffic Officer, Peshawar.
 District Police Officers, Khyber.
 SsP/HQrs:, & Legal CCP, Peshawar.
 Office Supdt: CCP, Peshawar.
 Office Supdt: CCP, Peshawar with a request to circulate to Accountants of Pay officer CCP, Peshawar with a request to circulate to Accountants of
 - Office Supdt: CCP, Peshawar Pay officer CCP, Peshawar with a request to circulate to Accountants of all Police Stations for further necessary action. PA to CCPO, EC-II & ASCCP Peshawar.

CAPITAL CITY POLICE OFFICER, PESHAWAR

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ميريل نمير:--002436

بوليس فارم نمبر 24-5(1)



ایتزائی اطلاعی ریودن نسبت جرم قاتل دست اندازی پولیس ریودن شده زیردفند 154 مجموعه ضابطه فوجد ادی

<u>تاری دوت د توند: AM 11:20 23-12 2023-1</u>

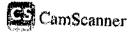
نير: 1100/23 تمان: كلير كمن على: يشاور الى تيك نبر: 100-12/12/2023 GBG-12/12/2023 بحواله ديث فمبر (10) برسبيل عام 6 القاندين ردائلي كى مار تابوت 1 تاريخ ووقت ريورت 12-12-202304:00PM <u>ABDUL AZIZ P/ASI ينة: تعانيه، موجوده بينة: بشاديد بيشه: نوليس السر</u> المام وسكونت اطلاح دمنده مستغيث 2 <u>نون نمبر :03139173830</u> مختر كيفيت جرم (مدد دفعه)وال المركح كمو كماب 1 9D-CNSA 15AA <u>419 ت ب</u> <u>420 ت ب</u> راستدرونده نزد آمف باغى روا جایئے د توعہ وفاصلہ تھانہ ہے اور ست به رسيد كى مر اسله ير مقدمه دون رجستر كياجا تاب-کاردائی متعلقہ تعیش اگر اطلاع درج کرتے ش کچھ توقف ہوا ہو تواس کی دجہ بیان کی جادے ثملی نون نمبر: 03459194213 1295/P بيلث نمبر: SI · HASSAN DALI

(ابتدائي اطلاح ينج درج كري)

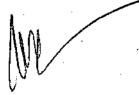
یوفت مدد بود ایک تحریری مراسله مخاصب عبدالعزیز خان SHO تحانه تظیرگ بے بدست عثمان ASI موصول بوکردیل ہے۔ محرو تحانه تظیرگ بشاور پس معد حتمان ASI ، حدثر اقبال SI انجارت توتعید ودیگر نفری پولیس بسلسله کشت علاقہ میں موجود تحاکمہ مخبر خاص نے اطلاح دی کہ ایک گاڑی REVO نمبری KZ8893 برنگ سفیر کونٹک کوربرنگ ساہ جس میں کانی مقد در ش مشیات کمی مجی وقت پنجاب سمکل کی جائے گی۔ اطلاح کو موصد قد جان کر میں معد ہمرائیان فوداً جائے و قوے بالا آکر دیکھا تو واقعی گاڈی REVO نمبر بالا کمز کا پاکر گاڈی کے متعلق موجود گان سے معلومات کرنے پر کمی نے مجلی ایک تا المیت خاہر نہیں کی فوداً بِرابیہ والک سکواڈ طلب کرے گاڈی چیک کرائی جاکر کلٹیر کرے تلاقی لینے پر فیکھے میںٹ سے 6 عدد برا یہ کرنے چیک کرائی جاکر کلٹیر کرے تلاقی لینے پر فیکھے میںٹ سے 6 عدد برا یہ کرنے چیک کرائی جاکر کلٹیر کرے تلاقی لینے پر فیکھے میںٹ سے 6 عدد برا یہ کرنے چیک کر چ س براند ہوئی جن ش سے بودی نمبر 1 سے 30 عد دیکٹ چ س براند کر بے پر ہرایک بیکٹ 1250/1250 یتنی کل 37500 گرام چ س کلی جن میں سے ہرایک پیکٹ سے 5/5 گرام چرس بغرض تجزیر FSL پارسل نمبر 30 جبکہ بتایا 37350 گرام چ س پارسل نمبر 31 ش ای طرح دوسری بودی … 30 پیک چ س برا به بوکرنی پیک 1250/1250 گرام لیتی کلی 37500 گرام چ س نکلی مخملہ چرس میں سے براہیک پیکٹ ۔ 5/ گرام بغرض تجزیر FSL پادسک نمبر 32 تا پارس نمبر 16 بیکر بطایا 37350 مرام چرس یارس نمبر 63 ش بند کر کے بودی نمبر 3 سے 30 بیکٹ چرس براید کر سے برایک بیکٹ سے 5/5 گرام چین کل 37500 مگرام چین کل 37350 مگرام چین میں سے برایک بیکٹ سے 5/5 گرام چرپے FSL پارس نمبر 63 تا پادسل نمبر 92 میں بجکہ بتایا 37350 گرام چ س پارسل نمبر 93 میں 1ی طرح بودی نمبر 4 سے 30 پیکٹ چ می برا یہ ہو کر بر ایک پیکٹ 1250 / 1250 گرام لین کل چ س 37500 گرام المکل جن میں سے 5 / 5 گرام بر بیکٹ سے چ می بخرض تجزیر FSL پارس نیر 94 تا 123 پارس جکه بتایا 37350 کرام چرس نیر 124 شرای طرح بودی نیر 5 سے 30 فیکٹ چرس برائد ہو کر برائیک پیکٹ 1250 / 1250 گرام لین کل چرس 37500 گرام لکی جن ش برائیک پیکٹ سے 5 / 5 گرام چرس بنز ش تجزیر FSL پارس فبر 125 ما 154 می جبکہ 37350 گرام چرس پارس نمبر 155 میں ای طرق یودی نمبر 6 سے 30 پیکٹ برا ایک دیکٹ 1250 / 1250 گرام لین کل چرس 37500 گرام لیکی جس میں برایک پیکٹ سے 5 / 5 گرام چ می بنر ض تجزید FSL با دس نمبر 156 می بتید بنایا 3735 گرام چ س پادس نمبر 186 می خدید 3 عدد بود یول سے جس میں برایک بودی ہے 25/35 پیکٹ چ س برا ایک بیکٹ دون کرنے پر 1250/1250 یون کل 131250 کرام چرس لکل جن میں یودکی نمبر 7 سے برایک پیکٹ سے 5/5 گرام چرمی بغرض جزیر FSL پادسل نمبر 223 بیکہ بتایا 43575 گرام چرس پارسل نمبر 223 میں ای طرح یودی نمبر 8 سے 5/5 پیکٹوں سے ہرایک پیکٹ سے 5/5 گرام چرم پر من تجزید FSL پارسل نمبر 228 جکد جاید جاچ من 43575 گرام پارسل نمبر 259 میں ای طرح یودی نمبر 92 55 تکنوں میں سے ہر ایک چکٹ سے 5/5 گرام بغرض تجزید FSL پارسل نمبر 269 تاپارسل نمبر 294 جبکد جا FSL کرام چی پارس نمبر 295 بمدای طرح یوی نمبر 10 بجی برا د موکر جس ش 50 دیکٹ چرس شی برایک دکت دون کرنے پر 1250 / 1250 کرام کلی یحن کل چرس 62500 کرام نگل برایک پیکٹ سے 5/5 کرام چی بغرض تجزیر FSL پارسل نمبر 296 تا پارسل فبر 345 جبکر بعار 2250 مگرام چرس پارسل نمبر 346 میں ای طرح بودی نمبر 11 سے 40 دیک جو کہ جرائیک دیکٹ دون کرنے پر 1250 / 1250 مگرام مینی کل 50000 کر ام کلی جن میں سے ہر ایک دیکٹ سے 5 / 5 گرام چر م بغرض تجزیر FSL یادسل نمبر 345 تایادسل نمبر 386 جبکد بتایا 44400 گرام چرس یاد سن 387 شدا ای طرت بودی نمبر 12 چیک کرنے پر 37 پیک انیون براند ہو کر برایک پیک 1200 / 1200 گرام افیون بینی کل 44400 گرام افیون چن ش ۔ 5/ مرام الحان بغرض بجويد FSL پارسل نمبر 388 تا پارسل نمبر 424 بجک بتا با 44215 گرام الحتان پارسل نمبر 425 میں ای طرح بودی نمبر 13 بیک کرنے پر 30 بیکت انحان برا حدود کی بیکٹ 1200 گرام لیتن کل 36000 گرام انجان کلی جن میں ے ہر ایک پیکٹ 5/5 گرام بغرض تجویر FSL یا رسل نمبر 455 میں جبکہ بنا 35880 گرام انیون پارسل نمبر 456 میں اسی طرح یودی نمبر 14 میں 20 پیکٹ انیون براند ہو کرنی پیکٹ وزن کرنے پر 1200/1200 گرام انیون پنی کل 24000 کرام انیون لگل جن شماست برایک پیکشدست 5 / 5 گرام افیون بغرض تجزیر FSL پارسمل نمبر 477 می نبر 476 می جند بتایا 23900 کرام انیون پارسمل نمبر 477 می اس طرح بودی نمبر 15 سے 20 پیکشد افیون براحد بوکر برایک پیکٹ دندن کرنے پر 1200/ 2000 گرام انجان بیٹی کل 24000 گرام انجان کل برایک پیکٹ سے 5/5 گرام انجان بغرض تجزیر FSL پارس نمبر 478 تا پارس نمبر 497 میں جکد بتایا 23900 گرام انجان پارس نمبر 498 میں اس طرت بودی نمبر 16 سے 20 پیکٹ افین براند بوکرنی پیک دون کرنے پر 1200/1200 کرام افیون یتی کل 23000 کرام افیون لگل، برایک پیکٹ ہے 5/5 گرام افیون بغرض جیوبہ FSL پارسل نمبر 1398 میں جبکہ بطایافیون 23900 گرام افیون لگل، برا یک پیکٹ نے 5/5 گرام افیون بغرض جیوبہ FSL پارسل نمبر 1208 میں جبکہ بطایافیون 23900 گرام اپلرسل تمبر 1959 پیک گاذی سر سونگا نورڈ ایک بیک میروش بند به بار سک شیپ زد دیرا مدہو کر به وزن 1300 کرام لکی مجلد شرا سے 1 کرام بغرض تجوید FSL پارسل نمبر 520 میں جبکہ بتایا 1299 کرام میروش پارسل نمبر 521 میں بند سر بمہر کر سے جلد پارسل حات سے اندر1 / 1 حدد نموند میرا می WC رکھ جاکر پارسلز جائے بر3 / 3 حدد موند میرا می WC طبت کے بجکہ محاذی کی فدید طلاحی لینے پر ڈرا تیور سیٹ کے ییچے سے 3 حدد پہتول 30 یود بلا تمبر اور ڈیٹن یورڈ پر 2 حدد موبائل فونزاز قسم ITEL برشک سکانی بلور اند ہو کر جلہ یاد سلوحات بمدہ 3 ہد دیستول 30 بود، 2 عدد مویاکل فونز اور REVO گاڑی نمبری KZ8893 پیس کمٹ شدہ کوبردے فرد تبند ہوئیں میں کرے فرو پر موقع مرتب کرے طوم / طومان نامعلوم نے دخا، فراڈ کرے سفید گاڑی پر کو تنگ کی ہے۔ طوم / طزمان نامطوم مر تحب جرم بالا سے پاکر جنگی کر فحکدی در چیش رکھ کر مراسلہ بدست مثلن ASI ار سال تعلنہ ہے پرچہ دیاجا کرانو کیٹی شیاف کوما مود تخفیش کیاجادے۔ دستخط انحریزی عبدالعزیز خان SHO گلبرگ ، کادوانی تعاند آندہ تحریری مراسلہ مرف به حرف درن بالا بوکر نقول پرچ جانت بغرض تشییش حوالد سلیم خان SI/OH کی جاسے ہیں جکہ طوّم / طوّان کی کر فکادی دو فی سب - پرچ کزارش ہے -

> SI HASSAN DALI 12-12-2023

R3=05858557 er drane 15 Par lagbing ا 9 غدد کا رائیس 424 No je A CON ・ のほくずちょ・・ ル 4.25 1 12 -0111 37350 DENSA - ISAN 13.3 31 0= [D 419 - 420 163-3 1. Dup 13 8/ = 61 mit - 1 1' 3 mits 1 3 O 125 (18 12/37350 11 62/31 () 156 @ Upp 11/5/5- 2 21 20 /21 @ 13 187 @ 12215 37 350 · 1 98 1 6 Ø 224 1 5/5 UN 143 EN 1. 1. 1 0 260 @ * 12 3735 . : 14 A Jul 0 216 @ 1/ 1/ 1/ 159 E125 4 19 3 347 @ 1/ 1/ 1/ 159 E125 159 19 3 1.1.1 m 1999 1990 10 10 10 10 10 6 347 @ a-1-1 455 @ 4 1 3735 - 186 Jol @ 476 @util/s/s. 1222 10 10 1-1 0 478 417 518 497 1 19/2 + 43575 = 2910-1 1 Ø She 1-15 D الر المر المركم محالد المسينز 385 (1) July 42 575 . 259 42 19 مل نعان زمان 4924 (mal) Ung Fy 5/5 -= 214 1 260 0-1 0 475 ALF 43575 : 215+ July @ 12.23 103915 5/5 -345 1-214 July 0



فرد مقرجتك чис арсия А-15АА ? 12 <u>12</u> год <u>1100</u> и год 419 4120 12 23 مام ملزم/ ملزمان تا معلوم روبر وگرایان ال کے دند مزان مالا من کما دری صلع کی تداری النے پر قبل سام کی عدد قورمان سرآ مرد کر سر حیک کر زیر جرس نقل عمل سے قرری زانے مرد عدد میک جرس مرآ مرکز کر وزن کر سر جرم برایک میک (1250) قرام نفل سر معرف کر تاریخ اورس روس مرآ مرکز کر وزن کر سر جرم برایک میک (1250) قرام نفل سر معرف کر تاریخ زمن من سے برامان سالم سے کر مرام رس معنی بو سے اوج بال ال مار بال 10 مرب ال جس قرص تر ساحة بإرس غر 63 كا مار سرا خر 64 تا وسرا خرسد و حكم بالا 3735 قرام جس الم الم 30 من اسى طرح دورى غر 4 2 00 سكن ج من برا مر فرك ماك مك مارید مین کل جس 3728 کام فعلی صبی سے آری کر جس برایک سلی کس 221 میں کل جس 3728 کام فعلی میں ایک کر جس برایک سلی کر مند میں کر جاری ہوتی کہ میں کا کار کر ایک کر میں مرامد حرک برایک مرکب 1250 129 میں اسی طرح فری غری سے ماد مرکب جرائی ایک مرکب مرکب 1250 حرام تف حل حرس ممتحة وام فك - عن م الله سلك م رام وس هرض قر م محمة عدام ولك عدا تل المحد من فع تقام 1025 قرام وس ما رس مر محدا من اسی طرح نوری مر 6 سے 30 سکت برا مر حرک مرکب محدد حدام جرس نفی حلی جرس ملک 325 گرا فعل - عمین ی دبک سکت سے جرک تائل ورى سى بارس ند 186 مى - حزير 2 عدد فررون سے حسن انك ورى سى حرك بيك جس راحد فرز برانك بيك وزن رار ا جَدَد حَكَم وَمَا كَرَم يَمَا حَرْم يَرْس إلى م حَدد - اسطر ورى 48 ٢ حَدد حَكم وَمَا كَرَم بِعَدْ سَ يَرُكُوم وَنِق حَرْبَ مَعَد بِ اللاد ٢ بارل 822 حكم ومان جرس 3575 4 حرام بارل م 922 من



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^{تر} متندشترم من 2023 منسل شدور مسل پشدور مت البرين مرام .نتدردهم 154A-205.12.2023 J. 1007---- 03 - 5 - 5 - 30 - 5-4 413/19 . 229 كرد ميرون 41619 HACNSA-208/12/2023/2/--1086-2-418.18* 420/19 أورقت 10 ساء HACNSA-209/12/2023-204091---الأركبية ترس 421=194 422.19 446(19) A50912 - 9MMC7-1584-211 12 2023 2.01098-a 🖓 🖓 🖓 امر: 556,25KG_72 مت 1100 م. بر 2023 ب 12 100 م 152.4.2 425-19 9DUNSA 15AA 419420 834-- بتمثرة في ريوتبر 15. 86.9 Cm 12 NID TAIAS/-PSETB 02-01-2024



13-B) حن اسطرح بوری بر ای کے 35 سکٹر ن س س برایک سکت میں گر ج من حفاض تحزي الم FSL لي يسل علم 622 ما ما يس 142 حركم تعاط 13 575 در با بارس بارس با 195 من اسطر در مرا على المرام برك صمیں وی سکت جرس حس سے برای سکت وزن کرنے کر محدا رام تقل - میں کو جس 2026 گام قام میں میں بائد من من مرا بل من من مرا بل من من مرا بل من من من من من من من من م برا گرام جس موض قرب ایج با در ای من 276 میں ماسط میں کا بار من کا کا در کا مار میں کا ا عن من سے برایل برایل میں رایل میں رایل میں روز اور جرمن خون کر سے ایل ا مر 347 ما بارس مر 386 جر رما ما 1980 ب 1 198 حس اسطر ترکی غرید ا حدک کر بر 18 میں اسطر ترکی غریب کر مرکز مراری میں صحف ترکی غرید ا حدک کر بر 75 میں اخد قرر مراری میں صحف ترکی مرکز مرابع العوں تعنی حق حد 14 میں احد قرر مراری اصلی هوان خری سادع کا سل 388 تا کا سل من ملالیا حمد کھا یا کا دہ بلا کر ا احداث قرب با المرکز کر 20 میں اسی طرح ہوتی جا 21 حدث کر 25 میک امور ر آفند هر کرخی منگ <u>صدا</u> کرام دهی کلی منطق کر ام اخرن رکل مسی سے برایک مکل سے برت کرام احرف فرض کی سلک جات 424 حرک بطان 5825 کی ام احمد نا برسل عز 6 کال حس اسی طرح وری عز 14 حی صد مکن محدی مراجع میں بار سی مرکز کی باری میں اسی طرح وری یم 14 میں عد میں اغیر ر ۲۰ مذہر مرکز جی سکٹ ورن اکر نے مر طعدا کر لم اخت رض میں محمد اللہ کرام مان تکل مرابع میں مرکز کی سک کو کو اخوں تک من میں اسی طرح وری بر کا مان محمد مرابع المار مراجع کر اخت میں مرکز کر کہ اخت میں اسی طرح وری بر کا میں محمد مرابع المار مراجع کر احمد میں مرکز کر کہ اخت کر مار میں مرکز کر مار مرحم الما مار مرکز کی المار میں مرکز کر المار میں اسی طرح وری بر کا میں مرحمد کر آخذ کر احمد مرکز کر المار میں مرکز کر مار میں مرکز کر ا مرحمد کر آخذ کر المار میں مرکز کر المار میں مرکز کر کہ مرکز کر المار مرکز کر مرکز کر المار مرکز کر مرکز کر مار میں کر کر مرکز کر المار المار کر مرکز کر مرکز کر مرکز کر مرکز کر مرکز کر مار مرکز کر مار مرکز کر مار کر مرکز کر مرک رزد برا مد مردس ورن (۲۵، زام دی وری می می ۱ گرم نور مرب بخت ۱۶۶۰ ورن مار می می در می نواب ۱۹۶۶ کرد مروس کا مرب مرب بخت ۱۶۶۰ ورن مار مردی می در نواب ۱۹۶۶ کرد مروس کا سرام در حين مد بيدرك حدام المراح بر حابة بيد الكرار الم غدد عرب حرامي . لا CamScanner

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13-0 ترج طر بار المار بر مرد عدد دو البر اسم عن من ش ت الد حما "مارد من ترد قرد می این بر در انگر رسین سے سے وعدد ليول مود در الم عر اور دسس ارد م عدد والم از تم ITel برنگ مكال لير برآ مرفرز في الرا مان مع د عدد بیمل ۵۶ فر و <u>و</u> عدد و با کر ون اور مر ۲٫٤ ۲٬۵ ٤٬۶۶ KZ 88٬۶۶ میں کے سرک س اس سفیر کو سال کور بروت ورمتع برمس من اک مرد بر موقع رت الت الخال وزد سے تکمی صرف رفار م موج کا کی the star SHO. PS. E. P. T. 12-12 - 23 M Laber Jeris Ez mes jo rules ni ju ASI ULE CamScanner

یو لیس مانیٹر نگ

آثوديورث نمير /رجسٹر سلسلہ دار نمبر



02-01-2024 10:30

داشدخانAMHC

تام اطلاح

2/10

پې لیس سٹیشن كليرك ديورث

ظاحد ذكور

اس درن جیکہ برطابق فہرست مال مقدمات رجسٹر نمبر 19 جو کہ من IHC کے ساتھ موجود متحے تمام مال مقدمات مقدمہ علت 1100 مور خہ 12.12.2023 جرم 9DCNSA.15AA.419.420 بوم 15AA، علت 1064. علت 1074-229 كرام بيروتن علت 1086 جرم 11ACNSA مع ترس ىلت 1088 ج م 15AA علت 1091 ج م 15AA علت 1092 ج م 15AA علت 1098 ج م 15AA دومت طود به توالد تور حزيز قاق MASI دومت طود به توالد تور حزيز قاق 15AA كر ي فيرست ، وستخط شمت كماكيا- تاكد سند مسبعد م بورت استياط در رج كم مى-

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OFFICE OF THE CAPITAL CITY POLICE OFFICER <u>PESHAWAR</u>

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

CAPITAL CITY POLICE O

/01/2024

PESHAWAR

ORDER

On 12/12/2023 a Black Double Cabin Rewo-Toyota vehicle was found standing in the juniadirtian of Police Station Guilberg, Pestanaur. On search hage quantity of Opium and Charas were recovered from the said vehicle. A case FIR No. 1100 dated 12/12/2023 u/s 9D-CNSA/15-AA/419/420 Police Station Guilberg has been registered against the unknown accuseds. The case property was shifted to Police Station for sampling for FSL and has to be immediately deposited in the Kacheri Matkhana made for the case property (narcotics only) as per SOPs/Instructions issued vide No. 321/R, dated 01/06/2022 & No. 4638/R-Inv: dated 28/09/2023. The same did not happen and after a month the case property is still lying in the Police Station. Reportedly, the case property has been neplined.

You are hereby directed to consist an empiry to determine the facts regarding the replacement of the case property, non adherence to the SOPs, FSL reports etc and the investignition conducted in the case so far. You are further directed to fix responsibility and report within 05 days positively.

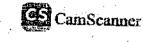
dated Peshawar the

so. 126 PA/CCP,

Copy to the-

1. SSP/Investigation, Peshawar for compliance and report.

Encl: of Pg:



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No.	3.2E PA	Dated Peshawar th		101	/2024.	(0)
	The Sealor Superintendent of Police, Operations, Pestimur.		Dy: No:	>6	<u>₹</u> R	
ubjeet:	APPEARANCE BEPTPRE ENOLTH	Y OFFICER.		0120		
	It in contractional at		SSP Opera	tions, Pe	shawar	•

It is submitted that enquiry regarding mispharement of case property in case FIR No. 1100 dated 12.12.2023 w/s 910-CNSA/15-AA-419-4200 PPC PS Guilberg is under process in this office. In connection with statements of the following address are required:

1. Mr. Waqas Rafiq SP Cann CCP, Peshawar.

2. Mr. Hansoon Jackson SIDPO Cannu CCP, perhawan.

Therefore, it is requested that the above-mentioned officers may be directed to appear before the undersigned by tumorrow i.e. 19.01.2024 at 02:00 PM to proceed further into the matter, please.

> CAubammad Ashfaq) PSP Senior Superintendent of Police. Investigation, CCP, Peshawar

/*****A.

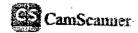
Copy of above is forwarded to the:

Monthly Capital City Police officer, Peshrwar,

Sp. Canit/SDPO Canit For Maction Pl.

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Contraction of Person.



OLEICE OF THIS SUPERINTENDENL OF POLICE INVESTIGATION PENHAWAR

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flie Capital City Police Officer,

10 Subject

<u>ENOPIRY REGARDING REPLACEMENT OF CASE PROPERTY IN CASE FIR NO.</u> Perhawar. 1100 DATED 12.12.2023 U/S 9D-CNSA/15-AA/419-420 PPC PS GULBERG,

Kindly refer to your good office Fadorsement No. 186 PA CCP dated 17-01 2023

BACKGROUND

Un 12/12/2023 a Black Double Cabin Revol-Loyota vehicle was found parked in the jurisdiction of Police Station Onlberg. Peshawar: On search huge quantity of Opium and Chars were recovered from the and whicle. Whereas, subject ented above case was registered against the unknown accused. The case property was shifted to Police Station for sampling for FSI, and has to be immediately deposit in the Kacheri Malkhana made for the case property (Narcones only) as per the SOPs/instructions resuld value No. 321/R, dated 01.06.2022 & No. 4638/R-Inv. dated 28.09.2023. The same did not happen and after a month the case property is still lying in the Police Station. Reportedly, the case property has been replaced

PROCEFUINGS.

for the purpose to scrutinize the matter. The alleged officials/officers were called to the office of the understyned, heard them in person and their statements were recorded and appended herewith, while their statements are as under;

STATEMENT OF WAQAS RAFIQ SP CANTT PESHAWAR.(F/A)

He stated that on 12.12.2023, Police Station Gulberg received an information about an abandoned vehicle that might be carrying narcotics. At that time he (SP Cantt Mr. Waqas Rafiq) was in meeting with SSP Operations. He issued directions to HIC Azmat Ali, reader to SP Canti, to reach the spot for supervision and taking pictures, videos of the operation to make at more transparent. The reader was continuously apdatung him about the developments which are being passed to SSP Operations as well. All pictorial and video evidences are available till opening of the nareotics bags, weighting them, separating FSL samples and closing of parcels, manufacture given below:

the definity are Br			The DEL	
Narcotics	Packets	In kg	For FSL	1
Chars	375x1250	468.750	1875 grams	
	1	1.300	Ol gram	
Beroin	127x1200	152.400	635 grams	
- Opium Barto				
+ Pistol	05450 0010	·		

He further stated that all the proceedings were ensured to be transparent in the presence of DSP Canti, SHO Gulberg and Reader to SP Cantt. Furthermore, all the recovered items were scaled in parcels and kept in the Malkhana of Police Station in correct condition. Till then everything was transparent.

STATEMENT OF HAROON JADOON SDPO CANTL(F/B)

He stated that on 12.12.2023 he was present with his senior officers at Police Lines. He was informed by SHO Gulberg regarding recovery of huge amount of contrabands and the same was brought into the notice of high ups. Whereas, upon information he rushed to the place of occurrence to assist the SHO Gulberg, along with Moharrir East Cant and BDS staff. Subsequently, recovered contrabands, vehicle, other goods were taken into possession. In this regard case FIR No. 1100 dated 12.12.2023 u/s 9D-CNSA-15AA-419-420 PPC was registered at PS Gulberg and entrusted to investigation staff for investigation. Video recording of place of

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Dated Peshawar the

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occurrence, vehicle and contrabands have been saved in mobile phone. He further stated that concerned SHO and Moharrir were directed to take the contrabands and vehicle in their safe custody, further he showed ignorance.

STATEMENT OF SLABDUL AZIZ SHO PS GULBERG.(F/C)

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He stated that he is performing duty as SHO Gulberg since 05 month. On 12.12.2023 at 11 AM, he received information on his mobile phone that vehicle Revo of Black color is parked near Asif Baghi park since last night, he along with other officials rushed to place of occurrence and found that information was correct. Meanwhile, During that he informed Mr. Waqas Rafiq SP Cantt and Mr. Haroon Jadoon SDPO Cantt. Later on, he made photos and video recording of the said vehicle and sent the same via whatsApp to SP Cant and also sent location of place of occurrence. Thereafter, he stated that SP Cantt sent his Reader Azmat to the place of occurrence, meanwhile SDPO and BDU staff also arrived. Upon clearance by BDU staff, in the presence of SDPO Cantt and Reader to SP Cantt, contrabands i.e chars, opium and heroin were recovered, and weighted them on the spot through digital scale. Subsequently, under the supervision of SDPO Cantt and Reader SP Cantt shipment of contrabands and vehicle were shifted to PS Gulberg and sealed them in parcels. Thereafter, he stated the whole procedure of scaling of contrabands took place in his presence along with SDPO Cantt and Reader SP Cantt-In connection to above Addl: Moharrir Rashid was directed to lock case property in malkhana and further directed him ensure entry of recovered articles into Register No. 19, after handling of case property Moharrir staff was strictly directed to strictly supervise/monitor the case property articles. He further stated that newly posted Moharrir ASI Abdul Aziz during taking charge of PS Gulberg was directed to deposit case property in the PM malkhana. On 17.01.2024, it has been ascertained that case property is being changed as told by (SSP Inv:) that case property is not original. Video and photos of contrabands and vehicle have been sent via whatsApp to DSP Inv; Khalid khan and the same can be produced when needed, as SDPO Canit and Reader to SP Cantt are the witnesses.

STATEMENT OF ASI AZIZ-UR-REHMAN MOHARRIR PS GULBERG.(F/D)

He stated that on 25.12.2023, took the charge as Moharrir PS Gulberg and case FIR No. 1100 dated 12.12.2023 u/s 9D-CNSA-15AA-419-420 PPC was registered at PS Gulberg before his posting. He further stated that the case property was under the custody of Addl: Moharrir Rashid. Thereafter, on 02.01.2024. Addl: Moharrir Rashid khan has handed over the case property of the said case in Daily Diary but his receiving signature is not present on the same parcels which are present in malkhana as it is.

STATEMENT OF ASI MUSHTAO MOHARRIR PS EAST CANT.(F/E)

He stated that he serving as Moharrar PS East Cantt. On 12.12.2023 SDPO Cantt Ilaroon Jadoon informed him telephonically to arrive PS Gulberg, as the SHO PS Gulberg has recovered contrabands and directed him to assist them in preparation of murasila and recovery memo. In compliance with; he assisted them and then returned to PS East Cantt. After lapse of 15/20 days SDPO directed him telephonically to handover the monogram of PS East Cantt to Moharrir PS Gulberg and the same was handed over to MM PS Gulberg. Further he shared ignorance regarding the matter.

STATEMENT OF IHC RASHID HUSSAIN ADDL: MOHARRIR PS GULBERG.(F/F)

He stated that he was posted as Additional Moharrar PS Gulberg and on 12.12.2023 the said case was registered at PS Gulberg and when he returned from station leave, SHO concerned handed over him 16 sealed base of case properties having no stamp and the said bags have been properly submitted at Malkhana. He

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SENIOR SUPERINTENDENT OF POLICE INVESTIGATION PESHAWAR /2024.

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orther stated that on 02.01.2024, on the transfer of Moharrar Aziz Ur Rehman to PS concerned, he handed over all ease properties received in his tenure to the said moharrar. In this connection charge signature was also taken on list from Moharrar Aziz Ur Rehman and also entered in Daily Diary for memorandum.

STATEMENT OF MUZAMIL KHAN NO. 952 (LIGHT DUTY) OF PS GULBERG.(F/G)

He stated that on 21.05.2017, he got several injuries during a terrorist attack on Police Post Shamshato PS Urmar. In this connection a proper case vide FIR No. 46 dated 21.05.2017 u/s-7-ATA/05-Exp/427/353/324 was also registered at PS Urmar. He further stated that presently he is posted on light duty and on the night of registration of the case vide FIR No. 1100/2023 he was present in Police Station and he is working with Moharrar staff. Furthermore, as he was posted on light duty, therefore he doesn't know anything about the occurrence took place on that night. He further stated that he is not going to PS malkhana and Kot, while he is sat with moharrir staff on his own mercy. Beside this, another constable is also posted at light duty with moharrir staff.

STATEMENT OF IHC MASOOD AHMAD MI PS GULBERG.(F/H)

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He stated that the case properties of Police Station are immediately handed over to Operations stalT and the case properties, government properties and Malkhana is in the custody of Moharrar operations. He lurther stated that Moharrar Investigation are having case properties of those cases which are returned from FSL in scaled parcels after examination and he is not aware of anything about the exchange of case properties of the said case.

STATEMENT OF IHC SHAFI ULLAH NO. 250 MM PS GULBERG.(F/I)

He stated that he is posted as Madad Moharrar PS Gulberg and in the said case only murasila was written by him and not knowing anything about parcels. He further stated that one day before arrival of Capital City Police Officer, Peshawar, moharrar Aziz Ur Rehman directed him to shift the case properties of aforesaid case to PM Malkhana through pickup. Furthermore, when he proceeded to PM Malkhana, incharge was not present and he contacted him through mobile phone, wherein the incharge told him that rack of your concerned Police Station is small and stated that he will demand for new racks to high-ups and then will apprise them for shifting of case properties to Malkhana. Furthermore, he brought back the said case property to Police Station and handed over to Moharrir.

STATEMENT OF LHC HIDAYAT MADAD MOHARRAR PS GULBERG.(F/J)

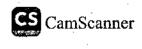
He stated that he is posted as MM and vide Daily Diary No. 04 dated 12.12.2023 at 09:00 hrs, he was on station leave for 02 days (DD report enclosed), while FIR No. 1100/2023 was registered at 16:00 hrs.

STATEMENT OF FC SHAH JEHAN OF INVESTIGATION STAFF. (F/K)

He stated the he was out from station with ASI Shafi Ullah for eating meal and he knows nothing further that for what purpose they were going out. As they reached Zaiqa restaurant situated at Ring Road, from there they brought packed food to Police Station. He further shows ignorance regarding the matter.

FINDINGS:

1. As per the contents of FIR No. 1100 dated 12.12.2023 u/s-9D CNSA/15-AA/419/420 PPC PS Gulberg, contrabands i.e. 468.75 kg charas, 152.400 kg opium and 1300 gram heroin by weight have been recovered while presently upon re-weighting for the purpose of re-sampling total 436.33 kg charas, 143.485 kg opium and 1315 gram beroin found present in PS Malkhana. In which total even and 15 greep exceeded in heroin.



OFFICE OF THE INVESTIGATION PESHAWAR SENIOR SUPERINTENDENT OF POLICE

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- 2. The previous FSL Opinion vide letter No. 265/FSL dated 04.01.2024 in case FIR No. 1100 dated
 - 12.12.2023 u/s-9D CNSA/15-AA/419/420 PPC PS Gulberg reveals that:
 - "The samples in question were subjected to physical and chemical test/analysis revealed that the sample
 - > It was charas in parcel No. 01 to 30,32 to 61, 63 to 92, 94 to 123, 125 to 154, 156 to 185, 187 to is: 222, 224 to 258, 260 to 294, 296 to 345, 374 to 386.
 - > It was opium in parcel No. 388 to 424, 426 to 455, 457 to 476, 478 to 497, 499 to 518.
 - > It was heroin in parcel No. 520.

Whereas, upon re-examination, FSL o pinion No. 132/FSL dated 22.01.2024, in the said case reveals that:

- > "The 128 exhibits were found negative for charas and opium while one parcel was found positive for the presence of methamphetamine (ICE) and heroin traces".
- > Stuff of the contents of all the above samples were physically found different from the samples earlier submitted by the 1.0 of the case FIR No. 1100 dated 12.12.2023 u/s-9D CNSA/15-AA/419/420 PPC PS Gulberg, Peshawar".

CONCLUSION:

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Going through the inquiry papers and material present on record, it came to the surface that case FIR No. 1100 dated 12.12.2023 u/s 9D-CNSA/15AA-419-420 PPC PS Gulberg was registered at PS Gulberg and huge amount of contrabands have been recovered from a Black Double Cabin Revo-Toyota vehicle, while the said contrabands were not deposited in PM malkhana within stipulated time period i.e. 72 hours. In this regard a proper SOP(Urdu version)vide No. 4638/R dated 28.09.2023 has also been issued, but after lapse of more than one month the case property is still lying in Police Station which is clear cut violation of the said SOP. More so, perusal of the former and later FSL report reveals that total case property (contrabands) has been replaced intentionally. Furthermore, during the course of inquiry it has been ascertained that the Charas has been sold on Rs: 28000/- per kg, Opium on Rs: 80000/- per kg and Heroin on 5 lacs per kg.

Therefore, keeping in view above, the role of each Police officer/official involved in the replacement/embezzlement of case property in case FIR No. 1100 dated 12.12.2023 u/s 9D-CNSA/15AA-419-420 PPC PS Gulberg, Peshawar are specified as below;

HAROON JADOON SDPO CANTT, PESHAWAR:

That he while being posted as SDPO Cantt, in the above mentioned case huge amount of contrabands were recovered and scaled in parcel in his presence but he failed to ensure the safe transportation on the same to PS Maikhana and subsequently PM Malkhana. Thus, the original case property was replaced with a forged one with sufficient reduction in quantity as well. All this shows his direct involvement in embezzling and replacing huge amount of contrabands.

SI ABDUL AZIZ K<u>HAN SHO PS GULBERG</u>

That he while being posted as SHO Gulberg and complainant of the case FIR No. 1100 dated 12.12.2023 a/s 9D-CNSA/15AA-419-420 PPC PS Gulberg, Peshawar, did not ensure the availability of original contrabands in the Police Station Malkhana and failed to deposit the said case property to PM Matchena muchy. Furthermore, on the said parcels either no monogram is affixed while in some parcely, the



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SENIOR SUPERINTENDENT OF POLICE INVESTIGATION PESHAWAR /2024. /₽A

Dated Peshawar the

nonogram of PS West Cantt are affixed instead of PS Gulberg. All this shows his direct involvement in embezzling and replacing huge amount of narcotics.

HC RASHEED HUSSAIN ADDL: MOHARRIR PS GULBERG.

That he while being posted as Addl: Moharrir PS Gulberg, case FIR No. 1100/2023 was registered on 12.12.2023, wherein huge amount of narcotics were recovered, the SHO/complainant of the case handed him over 16 scaled bags of case property without monogram with the direction to keep watch on the recovered contraband in PS Malkhana, despite this the same contraband was replaced, which shows his involvement in the process of embezzlement and replacement of case property.

ASI AZIZ UR REHMAN MOHARRIR PS GULBERG.

That he while being posted as Moharrir PS Gulberg, took the charge of recovered contrabands on 02.01.2024 from IIIC Rasheed Hussain (receiving list of case property 2023 enclosed) but did not deposit the same in PM malkhana till date, due to which the case property of case FIR No. 1100/2023 PS Gulberg has been replaced, which shows his direct involvement in embezzlement of the case property.

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Hence, the above mentioned officials/officers are found guilty for replacing and embezzling of case property in case FIR No. 1100 dated 12.12.2023 u/s 9DCNSA/15-AA/419/420 PPC PS Gulberg.

Submitted, please.

(Muhammad Ashfaq)PSP Senior Superintendent of Police, Investigation CCP, Peshawar DSP Cantt SHN Gulhe SCA Them MASE Culter Cuttons Cantt 50 tru M adorphance proceed further in โก reterrent Laws, '= propor case) [is to the with registered and fair 929/1/224 Case. in partial - enquinp investigation Conducted CamScanner



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Subject:- <u>STANDARD OPERATING PROCEDURE (SOP) FOR LAWFUL</u> <u>HANDLING OF NARCOTICS CASES AND ANCILLARY MATTERS.</u>

<u>AIM:-</u>

The rising tendency in offences of Narcotics, acquittal of criminals involved in offences of Narcotics on technical and procedural lacunae in recovery, seizure, search and arrest, necessitate and warrants Chalking out of SOP for the arrest of criminal under head Narcotics and effective prosecution of the accused charged in the offences of Narcotics.

Objectives:-

- The SOP is promulgated with for achieving the following objectives and goals:-
- a) To curb the menace of Narcotics.
- b) To ensure lawful arrest, recovery, seizure, search in Narcotics cases.
- c) To improve the standard of investigation and prosecution in Narcotics cases.

Guide lines

The following guidelines are issued for lawful handling of Narcotics cases. The Police officers shall be duty bound to follow the law governing the subject matter and the SOP in true spirit and prospective. The breach of guide line will render the defaulter officer for disciplinary and criminal action.

- 1. All Station House officers (SHO's) and Police officer of the rank of Sub-inspector have been declared authorized officer within the meaning of section 2 (e) of the KHYBER PAKHTUNKHWA Control of Narcotics Act, 2019 (hereinafter only referred to the Act) vide Order No. PA/Khyber Pakhtunkhwa/Bills-48/2019/6179, dated Peshawar, the 4th September, 2019. Therefore Police officers below the rank of Sub-inspector shall in no case exercise powers under the Act. The unauthorized officer will manage services of authorized officer for action under the Act. In case the officer below the rank of sub-inspector is unable to manage the services of authorized officer than he will proceed under prohibition Order 1979.
- Test purchase shall be made through responsible Police officer or reliable and trust worthy person. Though proceedings under the Act are exempted from compliance with 103 Cr.PC yet the authorized officer will record reason for not associating independent witnesses in search process under this Act.
- 3. The authorized officer will record all the details of recovery, seizure, arrest and search to ensure transparency and fairness of the proceedings.
- 4. The authorized officer, Naib court and prosecutor shall be directly bound to produce the case property for exhibition during evidence of the prosecution witnesses non-production of the case property for exhibition destroy the very foundation of the prosecution case.
- 5. Safe custody of case property is must for proving the charge. The authorized officer will be duty bound to enter proper report in the Daily Diary about responsibility of safe custody of the case property. The name of custodian of property will be included in the list of witnesses and he will depose that the property was in his safe custody.
- The dispatch of sample to FSL for analysis shall in no case be delayed beyond 72 hours. The name of officer who transmit the sample to FSL shall be cited as witness.
 - The authorized officer shall ensure possession of scale and scaling (12) Fi materials. He will lead evidence to the effect that the balance scale was available

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The authorized officer shall brief the witnesses to be examined in the case under Section 161 Cr.P.C and will direct them to keep diary/chart of memory of the proceedings. In the same vein Naib court will confront the witness with his statement outside the court before examination of the witness.

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The authorized officer will obtain signature/thumb impression of the accused on recovery memo and site plan. He will record the association of the accused in greparation of memo, samples and site plan and the entire investigation process.

- 10. SSP Investigation shall ensure training and briefing of the authorized officer on scaling and preparation of sample process.
- 11. Misuse of ease property vehicles and misappropriation of seized Narcotics and other materials is an offence under Section 409 PPC read with 5(2) of Prevention of Corruption Act, 1947 in addition to disciplinary action.
- 12. Destruction of the case property shall be made on the direction of Trial Court. Pre-Trial destruction of case property shall be made in presence of Magistrate. He will issue a proper certificate to this effect and will also prepare samples. Prosecution must ensure, that such Magistrates are mentioned as witnesses for trial/Challan.

(MUHAMMAD IJAZ KHAN)PSP CAPITAL CITY FOLICE OFFICER, PESHAWAR.

Copies to the:-

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- 1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
- 2. Senior Superintendents of Police, Operations & Investigation, CCP Peshawar.
- 3. Commandant CPC, Peshawar.

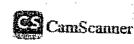
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4. District Police Officer, Khyber

- 5. Divisional SsP, CCP Peshawar
- 6. All SDPOs, CCP Peshawar

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4638 2 14, 10 <u> 98-07-1473,...</u> SOP MELISOP الخاند مثل تجمر ك المتواسد الدوالموجين متوق التواد ال متدم كليل ا. جب كولى بالمتحدم بحرض الدخال بالمكان الايا واللب توزل عدم كما تعدلات ليست حاكر التدويري الكواليك كومريد تأكر لات شرمت محيم آر. تتنيتى السر تعاند عى المتدمدكى تشوير اددد ويكادؤ تك كمريك 2. دود مرد کی بنیاو پر داخل شدد الی المتعد سر کی فیرست کی تعسیل وفتر جناب ایس ایس ایس او بد افر می میش کوار سال ک جائے۔ 3. بالمتدسير متدسركي تعسيل FIR متدمد طلت، تاريخ ج م تعلند، بسطالي وسرتر تعرودا تعلند كاحوالد تكمامياتيك 4. د صول کاد تات، دون، پارس باست کی تقصیل تقبرات اور لتحد اور انتساس اسلی کا ساعت اور بقسر داخل کلندو ، کی تفسیل تکمل تکنون با تکن 5. بر المراب مقد الدوان فردانس الماند كاجليك 6. MA المتسكة ال 18 25 كي معرك المحد مداخل تين كرين كا تاقير كا مودن عن مثلة تور تواز زمد والديو كا 12 كن كرين قرار بود المتدمدكو المالا من تحلق الإسباب فحلا تاجري بحكم في مالتقدمه بناديد وتترجناب المس المتن إلى صاحب الوحى تحسيتي وااتحل بالملا يوكى العد با 6 مد مردادر SHO _ وشاقت طى او ك 7. مالا تعمل کے حالبت دیکھنڈ کی محمل اور اشار ارتر تیرین مرکز میں سے الی متر مرکز عد الت میں تی کے متلقہ تعانہ DFC وردائر او كدده المتدم محقد عوالمت عماقتي الرجله 8. جب كولى يوليس انسركى مقد مديم كى كارى تبند يوليس كري تو 48 كمن ندكوره كارى كانونزى قادم بمعد تسادير اندرون بيرون PM الخاند كو ہم او FIR /مون اجر میورث ارسال کریں کے گاڈی تور تواند کی تحراف ٹی تھاند می ہو کی ادم وہ اس گاڈمہ دار ہو گا۔ تاہ والی کی صورت ش عدالت قركوه كرافته المكاس الملت كوالدمال كمست كار و. باردد تمان الخاندين و كما جانيكا تغنيش السركي ذمه دادى موكى كمدايك بفترك الدراندر عدالت مجازت سل كربزريد BDU تلى عمل ش الى جاكر BDU - مرتيقيت لكرتتال حل وحلقد وجنوات كري كا 10.10 متدمدكا على جلداند جلدك جانتي اللاانجان اللازة مدوان وكاكر مخلقة مرمد عن كالمفاق فت يوسد كرك تغد كما جانيك 11. جله مناف بادود كمالخاندش موجود ديسك لوشد PM الخاند على يجرى جلب ذمتر كمث الط ميشى تصحاحب ببتاهد كم تعم يوتائم ككافى ميدجم شي مريدمت معالى ملك كم نشيات معلق مال مقدمات تورى طور يرداقل ادستك فالمتال الأسليان AFF المحالى في المحالية في تحقق MM فبأوطئ



, Key ; 17701-3945056-7 برعال بالمر ملوية والتوخر ووالأسم (1) Strate (1) Ł ابتدائي اطلاعي ريورث y Konta ابتداني اطالع نسبت جرم فاعل دست الدازمي يوليس رمي رث شده زير وفعة المالجمور منابطة فوجداءك · · <u> بلغ الثامر</u> 1 S (val Est 813.20 100 29 dl تاريخ ووقت ريورت ۲ م دسکونت اطلاع د بند و و مستدنیت اورا ان ال ک مو باک نون نبر أرشاد مان ملا متسركيفيت جرم (معدافد 201. 11B(c)(1) Palice cart -my your Jul 12.12:12/11 ماسي وقر والاصلية اشت ادرمت بام د کونت فزم **_**0 كاروانى بوتيش مستلق كى كى اكراطار درت كرف شرقت مواموة وجدمان كرد الدرونها و روار در از درج رو مدرا درج رو مدر ا ٢- المانت، دالي كار فادت <u>به بسیا آل</u> ابتداني اطلاع فيحدرج كروب مسرمة تت بيري في المرمة وجدة ألا جرالا ت متدلى از صب من 24 مدد ما ان البنار المراري المراج ما والمراج ما ورام مراجر من 21 م راده المراجع من 21 م راده المراجع المرد المراجع من 21 م مرد المرد المراجع المرد المرد المرد المرد المراجع المرد الم · · الزمار والزمين مالية في Diger البيس عارون ورون . لعلاكيل وكوايردا مورت Asin ps Gulbarrag 21 - 01-20240 CS CamScanner



б.

OFFICE OF THE CAPITAL CITY POLICE OFFICER, <u>PESHAWAR</u>

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

CHARGE SHEET

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

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

3. Now therefore, as required by Police Rules 6 (1) of the said Rules, I Syed Ashfaq Anwar, Capital City Police Officer, Peshawar, hereby charge you SI Abdul Aziz No. 158/P, SHO Police Station Gulberg, Peshawar under Rule 5 (4) of the Police Rules 1975 on the allegations mentioned in the enclosed Summary of Allegations:-

4. And I hereby direct you further under Rules 6 (I) of the said Rules to put a written defense within 07 days of the receipt of this Charge Sheet as to why the proposed action should not be taken against you and also stating at the same time whether you desire to be heard in person.

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

Statement of Allegation is enclosed.

CAPITAL CITY POLICE OFFICER

PESHAWAR

No. DG-E /PA/CCP, dated Peshawar the <u>3D</u> / 01/2024.

Copy of the above is forwarded to the Enquiry Officer for initiating proceeding against the above named officer.





OFFICE OF THE CAPITAL CITY POLICE OFFICER, <u>PESHAWAR</u>

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

SUMMARY OF ALLEGATIONS

- (27)
- I, Syed Ashfnq Anwar, Capital City Police Officer, Peshawar as Competent authority, and of the opinion that SI Abdut Aziz has rendered himself liable to be proceeded against, as he committed the following acts/omission within the meaning of section 03 of the Police Rules 1975.

STATEMENT OF ALLEGATIONS

i)

On 12/12/2023 a Black Double Cabin Revo-Toyota vehicle was found standing in the jurisdiction of Police Station Gulberg, Peshawar. On search huge quantity of Opium, Charas and heroin were recovered from the said vehicle. A case FIR No. 1100 dated 12/12/2023 u/s 9D-CNSA/15- Λ /419/420 Police Station Gulberg was registered against the unknown accuseds. You were specifically directed by the undersigned to uncarthed the whole network of the smugglers and arrest the culprits. The case property was shifted to Police Station for sampling for FSL and has to be immediately deposited in the Kacheri Malkhana made for the case property (narcotics only) as per SOPs/Instructions issued vide No. 321/R, dated 01/06/2022 & No. 4638/R-Inv: dated 28/09/2023. The same did not happen and after a month the case property was still lying in the Police Station when the undersigned inspected it on 16.01.2024. Reportedly, the case property has been replaced.

- ii) SSP/Investigation Peshawar enquired the matter vide No. 430/PA, dated 24.01.2024
 in which you were found guilty for replacement and selling of the case property, non
 adherence to the SOPs and poor investigation conducted in the case so far.
- iii) Your act of replacing and selling the case property is ignoble and brought a bad name for the department.
- iv) Your act, being a member of police force, is highly objectionable and comes within the ambit of corruption according to Police Rules.

This misconduct is highly objectionable renders him liable for disciplinary proceedings under Police Rules 1975.

2. For the purpose of scrutinizing the conduct of mentioned accused officer with reference to the above allegations, <u>SP/HOrs:</u>, <u>Peshawar</u> is hereby nominated as enquiry officer to initiate enquiry and report within 07 days positively.

3. The Enquiry Officer shall in accordance with the provision of the Police Rules (1975) provide reasonable opportunity of hearing to the accused officer and make recommendations that the officer is guilty of the charges or otherwise.

CAPITAL CITY POLICE OFFICER, PESHAWAR The Capital City Police Officer, Office of the Capital City Police Officer, Peshawar.

SUBJECT: REPLA UNDER RULE 6 (1) 100 OF THE FOLICE RULES, 1975 TO THE CHARGE SHEET SUBVED ON THE UNDERSIGNED MIDE LETTER NO. 06-D/PA/CCP, DATED JU-91-2024

Respected Sir,

To.

In reference to charge sheet vide letter no. 06-E/DA/CCP, dated 10/01/2024. the applicant / undersigned most respectfully submits as under:

On 12/12/2023 at 11:00 am, while performing my duties as \$\$\$00 Gulberg. Peshawar, I received an information on my mobile phone regarding the fact that a vehicle i.e., black Revo was parked near Asif Baghi Park since last night. Upon such information I mshed to the place where such vehicle was parked and found truth in said information. In the meanwhile, the undersigned also conveyed the information to Mr. Waqas Rafiq (SP Cantt) and Mr. Haroon Jadoon (SDPO Cantt). Moreover, I also made some photos and video recording of the said vehicle and sent the same via whatsapp to SP Cantt along with location of the said place. Consequently, the SP Cantt sent his reader Azmat to the place of occurrence. Subsequently, the SDPO and BDU staff also arrived the spot of occurrence. Thereafter, the car was inspected by BDU staff initially, which stood non-consequential.

After getting it clear from BDU staff, the car was searched, in presence of SDPO Cantt and Reader to SP Cantt and surprisingly it lead to the recovery of contrabands, i.e., chars, opium and heroin. The recovered articles were weighted on spot through digital scale and thereafter sealed into parcels. After complying all the legal and codal formalities, the recovered vehicle and contrabands were shifted from the spot to the police station concerned, i.e., Gulberg Police Station, resulting into registration of FIR No. 1100 dated 12-12-2023. It would not be out of place to mention here that all the above-stated proceedings took place in presence of SDPO and Reader to SP Cantt.

After coming to Police Station concerned, the Additional Moharrar Rashid, who was on duty as Moharrar, was directed by the undersigned to lock the case property in Malkhana (*Storeroom*) with further direction to make entry in the relevant register i.e., Register 19. The additional Moharrar was further directed to strictly supervise / monitor the case property and the articles related therewith.

On transfer of Moharrar Aziz, he was again directed to take care of the case property and deposit the same in PM malkhana (*Storeroom*). Surprisingly, out of nowhere, after considerable time, the undersigned was informed that the case property, confiscated in FIR no. 1100 dated 12-12-2023, has been changed by someone and the property lying in malkhana (*Storeroom*) of the Police Station is not original.

That it is important to mention here that, being S.H.O of the Police Station and complainant of the FIR no. 1100 dated 12-12-2023 of PS Gulberg, Peshawar, the undersigned fulfilled his duties by sending / shifting the sealed case property along with

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its samples and vehicle to the Police Station concerned and directed the concerned officials to make entries in the relevant register and to store it in the relevant malkhana (Storevoom).

Legally, the undersigned performed his duty by shifting the case property to the police station and handed over it to the concerned officials and thereafter it was the responsibility of the enstedian to have secured it and should have keep it safe. For the purposes of reference, the relevant guideline, i.e., Guideline No. 5, is reproduced below,

"5. Safe Custody of case property is must for proving the charge. The authorized officer will be duty bound to enter proper report in the Dally Diary about responsibility of safe custody of the case property. The name of custodian of property will be included in the list of witnesses and he will depose that the property was in his safe custody."

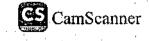
Applying the above guide line over the instant matter, the undersigned safely shifted the case property from the place of occurrence to the police station concerned. Thereafter, the concerned official, on duty at that time, i.e., Additional Moharrar, was directed to make entry of the case property, its samples, and the vehicle in the relevant register, which was duly complied, with further directions to keep the case property in malkhana (*Storeroom*) under his supervision because he will later on depose that the case property was in his safe custody.

On transfer of Moharrar Aziz, the charge of malkhana was handed over to him and he was also directed to keep the case properties safe under his supervision.

There was no responsibility of the undersigned to check it each and every time the case property in the malkhana because it was the responsibility of the concerned officials to keep it safe and secured. Moreover, it was not the duty of the undersigned, under the law, to investigate the matter rather it was the investigating officer to unearth the real facts of the case and to arrest the smugglers / accused involved in Case FIR no. 1100 dated 12-12-2023, therefore, the question of faulty investigation on part of the undersigned cannot be attributed to him.

That the inquiry in field is one sided and a wrong responsibility has been fixed against the undersigned because it doesn't prove the involvement of the undersigned in the alleged offence in any way. The SSP / Investigation, Peshawar, in his initial inquiry vide No. 430/PA dated 24-01-2024 has failed to trace out as to whom the alleged contrabands / case property was sold out and who received the sale consideration of the said articles. The findings of the inquiry officer in the inquiry is based on speculations and assumptions. The FIR has been registered against the undersigned illegally, without providing any opportunity for explanation and it doesn't prove the undersigned guilty. The undersigned can neither be served with such a notice nor any action can be taken against him under the law unless he is found guilty by the competent court of law.

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PRAYER:

It is, therefore, most respectfully prayed that keeping in view the above facts and circumstances of the case, the charge sheet issued and inquiry initiated against the undersigned may kindly be withdrawn and the undersigned may kindly be allowed to perform his duties in according with law. 30

Any other relief, not specifically prayed, may also be granted in favour of the undersigned.

INTERIM PRAYER:

In the present set of circumstances, the inquiry initiated and the charge sheet issued against the undersigned may kindly be suspended till the decision of the criminal case registered against the undersigned in the shape of FIR no. 50 dated 29-01-2024 in Police Station Gulberg, Peshawar.

APPLICANT

ABDUL AZIZ KHAN Former Station House Officer, Gulberg, Peshawar

UM AH



OFFICOF THE CAPITAL CITY POLICE OFFICER, <u>PESHAWAR</u>

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

<u>ORDER</u>

This order will dispose of the departmental enquiry against SI Abdul Aziz No. 158/P, the then SHO Police Station Gulberg, Peshawar who was proceeded against departmentally on the following charges:-

- i) On 12/12/2023 a Black Double Cabin Revo-Toyota vehicle was found standing in the jurisdiction of Police Station Gulberg, Peshawar. On search huge quantity of Opium, Charas and heroin were recovered from the said vehicle. A case FIR No. 1100 dated 12/12/2023 u/s 9D-CNSA/15-AA/419/420 Police Station Gulberg was registered against the unknown accuseds. He was specifically directed to uncarthed the whole network of the snungglers and arrest the culprits. The case property was shifted to Police Station for sampling for FSL and has to be immediately deposited in the Kacheri Malkhana made for the case property (narcotics only) as per SOPs/Instructions issued vide No. 321/R, dated 01/06/2022 & No. 4638/R-Inv: dated 28/09/2023. The same did not happen and after a month the case property was still lying in the Police Station when the Competent Authority inspected it on 16.01.2024. Reportedly, the case property has been replaced.
- ii) SSP/Investigation, Peshawar enquired the matter vide No. 430/PA, dated 24.01.2024 in which he was found guilty for replacement and selling of the case property, non adherence to the SOPs and poor investigation conducted in the case so far.
- iii) His act of replacing and selling the case property is ignoble and brought a bad name for the department. Being a member of police force, his act is highly objectionable and comes within the ambit of corruption according to Police Rules.

2. He was issued Charge Sheet and Summary of Allegations vide this office No. 06-E/PA/CCP, dated 30.01.2024. SP/HQrs: Peshawar was appointed as Enquiry Officer to scrutinize the conduct of the accused officer. The Enquiry Officer after conducting departmental enquiry submitted his findings in which the accused officer was found guilty.

3. Upon perusal of the relevant record and recommendation of the Epquiry Officer I, being competent authority hereby award him the major punishment of "dismissal from service" with immediate effect.

"Order is announced"

CAPITAL CITY POLICE OFFICER, PESHAWAR

No. 1223 - 33 /PA died Peshawar the 90 / 03/2024

- , Copies for information, and necessary action to the :-
- 1. SSP/Operations, Peak gar
- 2. SsP/HQr: & Cantt; Ps. awar.

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The Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

Subject:

To:

DEPARTMENTAL APPEAL UNDER RULE 11 OF KP POLICE RULES, 1975(AMENDMENT 2014) FOR RE-INSTATEMENT IN SERVICE,

Respectfully Sheweth:

Most respectfully, the appellant puts forth the following points for your kind consideration.

- I. Abdul Aziz Khun, Ex-SHO of Gulberg Police Station, CCP Peshawar, an writing to appeal against the dismissal order passed by CCPO Peshawar, issued against me (Attuched as F/A). Humbly request your attention and intervention in reviewing the decision made by the competent authority i.e. CCPO Peshawar.
- 2. On 12/12/2023, while diligently carrying out my duties, 1 received information about a suspicious vehicle parked near Asif Baghi Park. Acting promptly, 1 mobilized the necessary authorities, including SP Cantt and SDPO Cantt, to inspect the vehicle. The subsequent search led to the discovery of contrabands, including charas, opium, and heroin, in the vehicle.
- 3. Following protocol, I ensured that all legal and codal formalities were adhered to, and the case property was shifted to Gulberg Police Station for further processing. I diligently fulfilled my duties by promptly transferring the case property to the police station and directing the concerned officials to secure it in the relevant malkhana (Storeroom).
- 4. Furthermore, the inquiry conducted against me appears to be one-sided and lacks concrete evidence to prove my involvement in any wrongdoing. The findings of the initial inquiry falled to trace the alleged contrabands' sale and the individuals responsible for it. Moreover, I was not provided with an opportunity to explain my side of the story before the initiation of the inquiry.

In light of the above circumstances, I earnestly request your esteemed office to withdraw the dismissal order against me and reinstate the applicant with all back benefits.

I trust in your wisdom and impartiality to ensure justice prevails in this matter. Your timely intervention and fair consideration of my appeal will be highly appreciated.

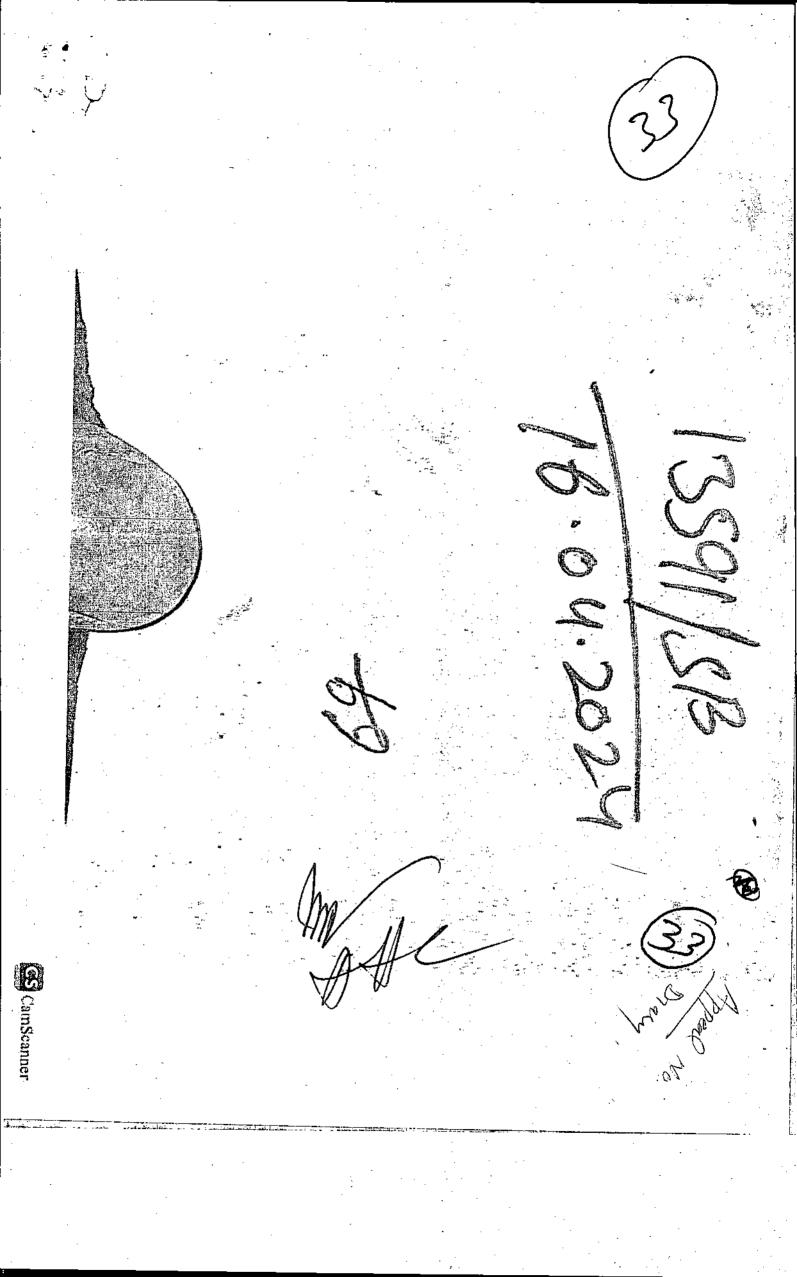
Thank you for your attention to this urgent matter.

Date:- 04.04.2024

You

Ex-SI Abdul Aziz No.158/P 03139173830





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Track Complaint Status

* شناختی کارڈ نمبر / CNIC Number

17301-9770847-5



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Public Complaint Date of Status Approval Name Complaint Body NG. Pending Capital Open Abdul 25-07-11557 1 Approval 2024 City aziz Police Office (CCPO),

Pechawar

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ث اور مارایسوسی ا**ی**شن، خسیسهر پخ ستوخواه ayar ايدوكيث: PESHAWAR باركوس االيوى ايش نمبر <u>2/2/- 1</u>3-18 Naucleh 03339577770 رابط تمبر: منجانب: د کوئ: Abdul AŽIB علية Wohallah Sha 99P Pesham 7 تحانه: مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے ہیروی وجواب دہی کا روائی متعلقہ آن مقام کمشیما ور سلم صران تخریم ان (ایم و تغییل) ، دیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاردائی کا کامل اختیار ہوگا ، نیز وکیل صاحب کو inaula راضى نامه كرف وتقر رثالث وفيصله برحلف دين جواب دعوى اقبال دعوى ادر درخواست از برقتم كى تصديق زری پر د شخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیردی یا ڈگری محطرفہ یا ابل ک برآ مدگ ادر منسوفی ، نیز ر) دائر کرنے اپیل نگرانی و نظر ثانی و بیردی کرنے کا مختار ہو گا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزون Adu کاردائی کے داسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقر رکا اختیار ہو گا اور صاحب مقرر شدہ کو دبی جملہ مذکورہ بالا اختیارات حاصل مہل کے اور آس کا ملختہ پر داختہ منظور و قبول ہو گا ددران مقدمه میں جو خرچه ہر جاند التو ست مقدمه سطر کر جب کے ہوگا کو کہا تاریخ پیشی مقام دورہ یا حد سے باہر ہوتو وکل صاحب پابند نہ اول تے کا پروی ندورہ کریں البنا دکا کہ مم کھ دیا تا کہ سند رہے الرقوم : <u>108.120 14</u> FS S Bara Abolul Puhan mo n0 g به اس د کالت ، مه کی نو نو کالې ، کالی جول ، وکې 17301-1557138-7 0333957770