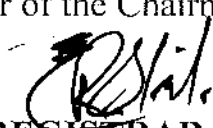


## FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 1437/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	<b>05-Sep-24</b>	<p>The appeal of Mr. Parvaz Khan today by Mr. Syed Nauman Ali Bukhari Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 23-Sep-24. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  <b>REGISTRAR</b></p>

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 1437/2024

PERVAIZ KHAN

V/S

Police Deptt

**INDEX**

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	-----	1-9
2.	copy of duties order	A.	10-13
3.	Copy of maqalmad	B.	14
4.	Copy of absence report	C.	15
5.	Copy of attendance report	C1	16
6.	Copy of suspension order	D.	17
7.	Copy of charge sheet	E.	18-19
8.	Copy of reply	F.	20
9.	Copy of dismissal order	G.	21
10.	Copy of D.appeal	H.	22
11.	Copy of appellate order	I.	23
12.	Copy of charge sheet	J.	24-25
13.	Copy of reply	K.	26
14.	Copy of dismissal order	L.	27
15.	Copy of D.appeal	M.	28
16.	Copy of impugned order	N.	29
17.	Copy of 11-A petition	O.	30-31
18.	Copy of rejection order	P.	32
19.	Copy of statement of SHO	Q.	33
20.	Copy of inquiry	R.	34-35
21.	vakalatnama	---	36

*Pervaiz*  
APPELLANT  
PERVAIZ KHAN

THROUGH:

*Noman*  
SYED NOMAN ALI BUKHARI  
(ADVOCATE, HIGH COURT)

&

*Uzma*  
UZMA SYED  
(ADVOCATE, HIGH COURT)

Cell No: 0306-5109438

(1)

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

APPEAL NO. 1437/2024

Parvaz Khan IHC NO: 2480  
PS Gulberg CCP, Peshawar.

(Appellant)

**VERSUS**

1. The Addl: Inspector General of Police, HQrs: KP, Peshawar.
2. The Superintendent of Police, KP, Peshawar.
3. The Capital City Police, Officer, Peshawar.

(Respondents)

**APPEAL UNDER SECTION 4 OF THE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974,**  
**AGAINST THE APPELLATE ORDER DATED 26/04/2023**  
**WHEREBY THE DEPARTMENTAL APPEAL OF THE**  
**APPELLANT HAS BEEN PARTIALLY ACCEPTED AND**  
**THE APPELLANT HAS BEEN RE-INSTATED IN TO**  
**SERVICE WITH IMMEDIATE EFFECT BY**  
**CONVERTING THE PENALTY OF DISMISSAL FROM**  
**SERVICE IN TO REDUCTION IN RANK AND THE**  
**INTERVENING PERIOD TREATED AS LEAVE**  
**WITHOUT PAY. AND AGAINST THE REJECTION**  
**ORDER DATED 06/08/2024 WHERE BY THE REVISION**  
**PETITION UNDER 11-A WAS REJECTED WITHOUT**  
**SHOWING ANY REASON.**

**PRAYER:**

**THAT ON THE ACCEPTANCE OF THIS APPEAL, THE**



**THE APPELLANT WITH ALL BACK AND CONSEQUENTIAL BENEFITS AND INTERVENING PERIOD MAY BE TREATED ON FULL PAY. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND PROPER MAY ALSO BE AWARDED IN THE FAVOUR OF APPELLANT.**

**RESPECTFULLY SHEWETH:**

**FACTS:**

1. That the appellant was serving as Head constable in Police Deptt and the appellant working with full zeal and zest to the entire satisfaction of his superiors.
2. That the duty of the appellant was assigned at Provincial Assembly due to security reason but on 30/05/2022 the duty of the appellant was also assigned at Nishtar Hall Vide order dated 29/05/2022. **Copies of the duties order is attached as annexure-A.**
3. That the appellant was confirmed regard his duty from the PS because on 30/05/2022 the appellant was assigned duties on two place which is not possible, so the appellant confirmed the duty before leaving PS, the appellant was informed to perform duties at Provincial Assembly, which is evident from the Naqal Mad. **Copy of Naqal Mad is attached as annexure-B.**
4. That the absence report of the appellant was submitted on 30/05/2022 that the appellant was not available at his duty place i.e Nishtar Hall, without confirmation that the appellant was present at Assembly Hall for duties. Thereafter, the appellant report back to PS Gulbarg at 7:10 P.M after performing duties at Assembly Hall. **The copies of the absent report and attendance report are attached as annexure-C & C1.**
5. That on the basis of above mentioned fact without taking statement from any other official whom were present with the appellant at the place of duty, the appellant was suspended vide order dated 31/05/2022 and charge sheet and statement of allegation was issued and the appellant properly replied to the charge sheet and denied the entire allegation. **Copies of the suspension order, charge sheet and reply are attached as annexure-D, E & F.**

6. That thereafter, the inquiry was conducting without recording any statement even not recorded the statement of the SHO Sharfi, regard which clearly mentioned by the appellant in his charge sheet. So the one sided inquiry was conducted and without issuing any final show cause notice and inquiry report was also not provided to the appellant and issued dismissal order dated 06/07/2022. **Copy of dismissal order is attached as annexure-G.**
7. That the appellant being feeling aggrieved filed departmental appeal. The departmental appeal of the appellant was accepted vide order dated 28/10/2022 and on acceptance of the departmental appeal the appellant was re-instated in to service for de-novo inquiry. **Copy of departmental appeal and appellate order is attached as annexure-H & I.**
8. That again the charge sheet was issued but with addition of the some unfounded/baseless allegation mentioned therein the charge sheet without any proof on malafide intention. The appellant properly replied to the charge sheet and denied the entire allegations with cogent reasons but again one sided inquiry was conducted and without issuing any final show cause notice and inquiry report was also not provided to the appellant and the appellant was once again dismissed from service vide order dated 14/12/2024. **Copies of charge sheet, reply and dismissal order are attached as annexure-J, K & L.**
9. That the appellant being feeling aggrieved filed departmental appeal. The departmental appeal of the appellant was accepted vide order dated 26/04/2023 and on acceptance of the departmental appeal the appellant was re-instated in to service with immediate effect by converting the penalty into reduction in rank without specifying the period and intervening period treated as leave without pay. **Copy of departmental appeal and impugned appellate order are attached as annexure-M & N.**
10. That the appellant feeling aggrieved filed revision petition under 11-A on 28/04/2023 but the same was rejected vide order dated 06/08/2024 without showing any reason. The appellant having no other adequate remedy, now the appellant comes to this august Tribunal on the following grounds amongst others. **Copies of appeal and rejection order are attached as annexure-O & P.**

**GROUNDS:**

- A) That impugned order dated 26/04/2023 and 06/08/2024 is against the law, facts, norms of justice and material on record to the extent of reversion and period treated as leave without pay.

4

Therefore, not tenable and the order dated 26.04.2023 liable to be modified.

- B) That if the appellant was not performed the duties for the period i.e from the date of dismissal to date of re-instatement, due to wrong dismissal order of the appellant, so there is no fault on the part of the appellant, so the appellant is entitled to all back benefits.
- C) That the absence report of the appellant was submitted on 30/05/2022 that the appellant was not available at his duty place i.e Nishtar Hall, without confirmation that the appellant was present at Assembly Hall for duties. Thereafter, the appellant report back to PS Gulbarg at 7:10 P.M after performing duties at Assembly Hall. The version of the appellant was supported by the SHO Sharqai.
- D) That during the inquiry, the statement of witness recorded if any neither in the presence of the appellant nor provided opportunity to the appellant to cross examined the witness which is against the law and rules.
- E) That the penalty order of the appellant is the violation of FR-29 as in the penalty order it was not mention the period of reversion.
- F) That the penalty order of the appellant is the violation of FR-29 as in the penalty order it was not mention the period of reversion to the rank of constable to be effective.
- G) That the sufficient grounds of innocence of the appellant exist as per provision of supreme court judgment cited as NLR 2005 TD supreme Court Page 78" as no one punished for the fault of others. So the impugned order is illegal.
- H) That the appellant cannot be held responsible for the lapse/irregularities committed by the department and in such case the Hon'able Supreme Court of Pakistan has held the department responsible not the appellant.
- I) That the inquiry proceedings were conducted at the back of the appellant, no fair opportunity of defense was provided to appellant. No chance of cross examination of alleged witnesses was provided to appellant, No legal , solid and material evidence was brought on record in support of the charge . petitioner was not confronted with any evidence , therefore the impugned order based on defective enquiry is not sustainable.

J) That the penalty imposed upon the appellant is illegal and void because there is no specification of time in impugned order which is violation of Fr-29 and superior court judgments

K) That the appellant is not deprived from the back benefits for the period which they remained out of service without any fault from their side, that According to judgment of Supreme Court reported as 2007 PLC Supreme Court-184 as mentioned below:

“the salaried of civil servant would not be withheld for the intervening period when they remained out of service due to whimsical and arbitrary actions of the functionaries. Civil servant had every right to recover their arrears”.

So, in the light of Supreme Court Judgment the appellant is also legally entitled for their salaries.

L) That no proper inquiry was conducted Neither any documents or report was provided to appellant for examination nor any statement of witnesses recorded in the presence of appellant. Even a chance of cross examination was also not provided to the appellant during fact finding inquiry which is violation of norms of justice.

M) That there is no chance of self-defense was provide to the appellant and according to Supreme Court judgment mere on the basis of allegation no one should be punished.

N) That the inquiry report and show cause was not provided to the appellant, which is clear violation of Superior Court judgment. That principal is also held in the appeal of the **Waleed Mehmood**

6

according to superior court judgment cited as 2017 PLD 173 and 1990 PLC cs 727.

- P) That the appellant was deprived of his inalienable right of personal hearing and opportunity to cross examine witnesses. The opportunity of offering proper defense was snatched from the appellant. The Hon'able Service Tribunal has been consistently following this yardstick almost in all cases, so departure from the set pattern and that too without any cogent reason in the present case would cause irreparable damage to the appellant at the cost of substantial justice. Such inquiry proceeding could not be termed as fair, just and reasonable, as the respondents badly failed to prove allegation mentioned in charge sheet. such practice has already been disapproved by the apex court contained in its judgments *PLD 1989 SC 335, 1996 SCMR 802, 2018 PLC (CS)997 and 2019 SCMR 640.*
- Q) That according to Federal Shariyat court Judgment cited as *PLD 1989 FSC 39* the show cause notice is must before taking any adverse action, non-issuance of show cause notice is against the injunction of Islam. Hence the impugned order is liable to be set-aside.
- R) That the show cause is the demand of natural justice and also necessary for fair trial and also necessary in light of injunction of Quran and Sunnah but show cause was not given to the appellant. So, fair trail denied to the appellant which is also violation of Article 10-A of the constitution. Further it is added that according to reported judgment cited as *1997 PLD page 617* stated that every action against natural justice treated to be void and unlawful. Hence impugned order is liable to be set-aside. The natural justice should be considered as part and parcel of every statute according to superior court judgment cited as 2017 PLD 173 and 1990 PLC cs 727.
- S) That it is the maxim of the law (audi alteram peltrum) that no one should be unheard, and the impugned order is also passed in violation of article of 10-A OF the constitution of Pakistan which told us about the fair trial which was the fundamental right of the appellant but denied to the appellant. So the impugned order is not tenable in the eye of law.
- T) That before passing impugned order no codal formalities was fulfilled and no proper procedure was adopted which is the violation of the Police Rules 1975; hence the impugned order is not sustainable, liable to be set aside.



- U) That the SHO clearly stated in his statement that the appellant was available at his place of duty on 30/05/2022 and the appellant properly performed his duties but the respondent ignore the same just to dismiss the appellant from service. **The copy of the statement is attached as annexure-Q.**
- V) The competent authority did not use his independent mind and dismissed the appellant from service which is evident from the inquiry report which is collected by the appellant after the dismissal order. **Copy of the report is attached as annexure-R.**
- W) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

*It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.*

*Pervaiz*

APPELLANT  
PERVAIZ KHAN

THROUGH:

*Noman*

SYED NOMAN ALI BUKHARI  
(ADVOCATE, HIGH COURT)

&

*Uzma*

UZMA SYED  
(ADVOCATE, HIGH COURT)

②

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL NO. \_\_\_\_\_/2024

PERVAIZ KHAN

V/S

Police Deptt:

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.

*Pervaiz Khan*

DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The Police rules 1975.
3. Any other case law as per need.

APPELLANT  
PERVAIZ KHAN

THROUGH:

*Syed Noman Ali Bukhari*  
SYED NOMAN ALI BUKHARI  
(ADVOCATE, HIGH COURT)

&

*Uzma Syed*  
UZMA SYED  
(ADVOCATE, HIGH COURT)

9

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

S.A NO. \_\_\_\_\_/2024

PERVAIZ KHAN

V/S

Police Deptt.

AFFIDAVIT

I, PERVAIZ KHAN (Appellant), do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.

DEPONENT

  
PERVAIZ KHAN



OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

SP SECURITY OFFICE # 091-9212587  
Email: spsec2016@gmail.com



SECURITY ORDER NO. ( 1353 )

CONFIDENTIAL

**POLICE SECURITY ARRANGEMENTS FOR LAWYERS CONVENTION AT NISHTAR HALL  
PESHAWAR CANTT.**

**INFORMATION**

EVENT	VENUE	DATE & TIME
<p><b>"Lawyers Convention"</b> Headed by Ali Zaman President ILF Peshawar Bar Association Mr. Imran Khan Chairman PTI will speech &amp; Hon'ble Chief Minister Khyber Pakhtunkhwa alongwith MPAs will participate.</p>	<p>At Nishtar Hall Peshawar Cantt  (PS East Cantt')</p>	<p>On 30.05.2022  At 15:00 hrs</p>

**INTENTION.**

- To maintain Law and Order.
- To protect the VIPs/Participate/ Govt. property.
- To ensure smooth flow of traffic.

**METHOD:**

To achieve the above objective, the following security arrangements are hereby made:

**ROUTE PROTECTION FROM CM HOUSE UPTO NISHTAR HALL PESHAWAR CANTT AND BACK.**

**OVERALL INCHARGE SP CANTT**

S. No	Name of Sectors	Deployment
1.	From CM House upto Jail Chowk	ASI Irfan Ali (0317-6980855) of Security Unit alongwith 10 FCs from Police Lines + BDS Should clear the route.
2.	From Jail Chowk upto Nishtar Hall	ASI Hidayat Khan (0333-9112353) of Security Unit alongwith 10 FCs from Police Lines + BDS Should clear the route.
3.	From Nishtar Hall upto PC Cross	ASI Inayat Khan (0316-9813256) of Security Unit alongwith 10 FCs from Police Lines + BDS Should clear the route.
4.	From PC Cross upto CM House	ASI Ilaf Shah (0346-9171662) of Security Unit alongwith 10 FCs from Police Lines + BDS Should clear the route.

**ROUTE RESPONSIBILITY**

LO Security Unit shall deploy the strength in accordance with the route.

**SECURITY AT NISHTAR HALL PESHAWAR CANTT**

**OFFICER INCHARGE SDPO CANTT ASSISTED BY SHO EAST CANTT**

MAIN ENTRANCE	INNER CORDON
<p>ASI Asad Khan (0321-9880292) of PS West Cantt with 04 FCs + 02 Ladies Police + Metal Detector/Mirror &amp; walk through gate from Police Lines Peshawar.</p>	<p>SI Fida Khan (0316-5050866) of PS East Cantt assisted by SI Shah Wali (0336-9869478) of PS Pishtakhara, ASI Parvaz Khan (0315-5598995) of PS Gulberg, ASI Dil Shad (0333-8773634) of PS East Cantt &amp; ASI Ali Ijaz (0346-7272744) of PS KRS with 20 FCs + 1-3 Ladies Police + 01 BDS FC with sniffer dogs, Jammers, Walk Through Gate &amp; ASI Anwar Khan (0334-9138163) of PS Town with 08 FCs in Civvies from Police Lines Peshawar.</p>

**SECTOR INCHARGE MR. ARAB NAWAZ (0300-5959123) DSP SECURITY**

OUTER CORDON	ROOF TOP
<p>SI Tahir Khan (0333-9198180) of PS Faqirabad assisted by ASI Inam Ullah (0312-5856433) of PS Kotwali, ASI Noor Khan (0312-9966441) of PS Chamkani &amp; ASI Arhad Iqbal (0314-9086529) of PS Machani Gate with 20 FCs + 01 BDS FC with sniffer dogs from Police Lines Peshawar.</p>	<p>SI Ghulam Haider (0316-9755531) of PS Chamkani with 10 FCs from Police Line Peshawar</p>

12

RAILWAY TRACK	CAR PARKING
SI Malang Jan (0315-9167573) of PS Shah @abool with 10 FCs from Police Line Peshawar	ASI Muhammad Rehman (0302-5960600) of PS Tehkal with 06 FCs + Metal Detector / Mirror from Police Lines, Peshawar.

**RESERVE STRENGTH**

02 Platoons FCs will be reserve at Police Lines on disposal of SP Cantt.

**ABABEEL SQUADS**

SP Cantt to deploy Ababeel Squads on important route/venue.

**NOTE**

The Officer/Sector Incharges assisted by SHO East Cantt shall deploy the strength accordance to the programme.

**COMMAND & CONTROL**

I/C Command & Control is directed to inform all officers/Police Stations regarding their duty and convey ok report to High-Ups well in time

**ROOF TOP DUTY ON ROUTE:**

- (i) Concerned SDPOs/SHOs will deploy suitable strength on the roof tops in their respective sectors to ensure the safety/security of the VIPs.
- (ii) Concerned SDPOs/SHOs shall be responsible for deploying/supplementing Nakas on the main crossing/roads/streets & by the mobile patrolling. All important points/congested bottlenecks shall be manned with adequate strength.

**EVACUATION PLAN**

In case of Emergency / Untoward incident etc. SDPO Cantt is directed to make arrangements for the safe evacuation of the VIPs to the safe place in Security Cordon according to the SOP. The place & route shall only be determined by SP Cantt already and in the knowledge of SDPO Cantt.

**SPECIAL BRANCH**

DIG Special Branch is requested to deploy his strength in plain clothes with the direction to coordinate with the local Police as well as District Security Branch of Peshawar.

**TRAFFIC**

Chief Traffic Officer Peshawar is requested for making necessary Traffic arrangements.

**BDU.**

AIG Bomb Disposal Unit shall depute his staff for sweeping the route/venue of visit with the help of explosive detectors from Security point of view.

**CANINE UNIT**

Director Canine Unit shall depute his staff for sweeping the route/venue of visit with the help of sniffer dogs from security point of view.

**AMBULANCE**

District Emergency Officer Rescue 1122 Peshawar is requested to provide Ambulance vehicles of Rescue 1122 with PERA Medical Staff to be present at the route/venue.

**CITY PATROLLING**

DSP City Patrolling is directed to be vigilant alongwith their staff in their area of responsibility.

**MOBILE PATROLLING**

Concerned Police Stations Mobiles alongwith RRF, Elite Mobiles & Ababeel Squads will patrol & remain alert during the entire visit of VIPs.

**OTHER TASKS**

Scan	Information	Traffic control	Administration	Over all supervision
I/C BDS	I/C Emergency	C.T.O	SP HQrs	SSP Operations

FOR CAPITAL CITY POLICE OFFICER,  
PESHAWAR

**No.14671-80/SB, dated Pesh the, 29.05.2022**

Copies to the:-

1. DIG of Police Operations Khyber Pakhtunkhwa.
2. DIG Police, Special Branch Khyber Pakhtunkhwa
3. Chief Traffic Officer Peshawar
4. SSP Operations Peshawar
5. AIG BDU/Director Canine Unit Special Branch Peshawar.
6. SP Cantt & HQrs
7. DSP/HQrs Peshawar
8. PSO to W/CCPO Peshawar
9. I/C DSB
10. I/C Command & Control.



**OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR**

**SP SECURITY OFFICE # 091-9212587  
FAX # 091-9214094  
Email: [spsec2016@gmail.com](mailto:spsec2016@gmail.com)**



13

**AMENDMENT**

In continuation of this office Security Order No. 618, issued over endst: No. 6551-60/SB, dated 09.03.2022 regarding security arrangements for the Session of the Provincial Assembly with effect from 10.03.2022 till further orders.

The following amendment in the security programme is hereby made.

**ASSEMBLY HALL GATE NO. 02**

Please read the name of ASI Pamroz Khan of PS Pharipura in place of ASI Shah Khalid of Ps Pharipura (due to transfer FRP).

**OUTER CORDON**


Please read the name of ASI Parvez Khan of PS Gulberg in place of ASI Rehmat Khan of PS Gulberg (due to transfer Moharrar SGH)

**GATE NO. 03 ( INNER SIDE)**

Please read the name of IHC Naseer Khan No. 4315 of PS Mattani in place of ASI Raees Khan of PS Mattani (due to request SHO Mattani).

**I/C EMERGENCY**

Incharge control is directed to inform the concerned officers accordingly.  
Rest of programme will be the same.

  
**CAPITAL CITY POLICE OFFICER,  
PESHAWAR**

**No. 12621-30 /SB, dated Pesh the, 13.05.2022**

Copies to all concerned for information and necessary security arrangements



18-09-2022  
MM P.S.G.B.

*(Signature)*  
M. A. Khan

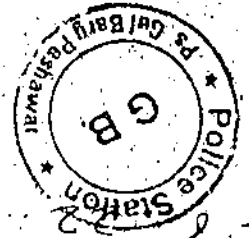
دستور العمل کے مطابق  
پولیس اسٹیشن پر  
مقررہ وقت پر

30-05-22  
30-05-22

30-05-22  
30-05-22

30-05-22

30-05-22



15-6  
M.A. 68

*(Signature)*

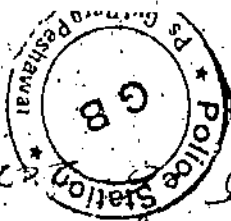
*(Faint, mostly illegible handwritten text, possibly bleed-through from the reverse side of the page)*

15-6  
C-18

30-5 30-22

*(Handwritten mark or signature)*





M. M. P.S. G.B.  
15

Handwritten signature

Handwritten notes in Urdu script, including the number 1353.

Handwritten text at the bottom of the notes section.

Handwritten text at the bottom left corner.

G B

30.5.22

Handwritten text at the bottom right corner.



OFFICE OF THE  
SUPERINTENDENT OF POLICE  
CANTT: PESHAWAR

D-17



No. 783 /PA dated 31/5/2022.

ORDER

ASI Perwar Khan of Police Station Gulberg is hereby placed under suspension and posted to Police Lines Peshawar with immediate effect.

Charge sheet and summary of allegations are being issued to him separately.

No. 1378

Dated 31/5/2022

M. AZHAR KHAN (PS7)  
SUPERINTENDENT OF POLICE  
CANTT PESHAWAR

Copy of above is forwarded for information to the

- 1. Capital City Police Officer, Peshawar
- 2. Sr. Superintendent of Police Operations, Peshawar
- 3. Copy to all concerned



CHARGE SHEET

E 18

I, Superintendent of Police, Cantt., Capital City Police Peshawar, as a competent authority, hereby, charge that ASI Pervaiz Khan No. 2480 of Capital City Police Peshawar with the following allegations.

"You ASI Pervaiz Khan No. 2480 while posted at PS Gulberg were found incompetent/unprofessional. It is the evident that your assembly duty was imposed. On 30.05.2022 the undersigned, checking the assembly deployment but you were not found. Such lethargic attitude on your part reflects grave negligence, non-seriousness, insubordination and lack of responsibility and discipline. This amounts to gross misconduct on your part and against the discipline of the force."

You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the Enquiry Officer committee, as the case may be.

Your written defence, if any, should reach the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person.

A statement of allegation is enclosed.



**M. AZHAR KHAN (PSP)**  
SUPERINTENDENT OF POLICE,  
CANTT: PESHAWAR

DISCIPLINARY ACTION

19

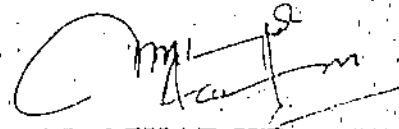
I, Superintendent of Police, Cantt, Capital City Police Peshawar as a competent authority, am of the opinion that ASI Pervaiz No. 2480 have rendered themselves liable to be proceeded against under the provision of Police Disciplinary Rules-1975.

STATEMENT OF ALLEGATION

That ASI Pervaiz No. 2480 while posted at PS Gulberg have been found incompetent/unprofessional. It is the evident that his assembly duty was imposed. On 30.05.2022 the undersigned checking the assembly deployment but he was not found. Such lethargic attitude on his part reflects grave negligence, non-attendance, insubordination and lack of responsibility and discipline. This amounts to gross misconduct on his part and against the discipline of the force.

For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and ASP Hayatabad is appointed as Enquiry Officer.

2. The Enquiry Officer shall, in accordance with the provisions of the Ordinance, provide reasonable opportunity of hearing to the accused officer, record his finding within 30 days of the receipt of this order, make recommendations as to punishment or other appropriate action against the accused.
3. The accused shall join the proceeding on the date time and place fixed by the Enquiry Officer.



M. AZHAR KHAN (PSP)  
SUPERINTENDENT OF POLICE,  
CANTT: PESHAWAR

No. 46 /E/PA, dated Peshawar the 22/06 /2022.

1. \_\_\_\_\_ is directed to finalize the aforementioned departmental proceeding within stipulated period under the provision of Police Rules-1975.
2. Official concerned

17/6/2022  
Page 3

(100)

The first part of the paper is a  
 short answer question. It asks  
 you to explain the difference  
 between a primary and a  
 secondary market. The  
 answer is that in a primary  
 market, the issuer is selling  
 the securities for the first  
 time. In a secondary market,  
 the securities are being sold  
 by someone who has already  
 bought them. The primary  
 market is where the issuer  
 gets the money. The  
 secondary market is where  
 investors trade the securities.  
 The primary market is  
 usually a private market.  
 The secondary market is  
 usually a public market.  
 The primary market is  
 usually a market for new  
 issues. The secondary market  
 is usually a market for  
 existing issues.

**ORDER**


This office order will dispose off the departmental proceedings against IHC Pervaiz No. 2480 while posted at PS Gulberg CCF Peshawar in the allegations that in assembly duty was imposed. On 30.05.2022 the undersigned checking the assembly deployment but he was not found. Such lethargic attitude on his part reflects gross negligence, non-seriousness, insubordination and lack of responsibility and discipline. This amounts to gross misconduct on his part and against the discipline of the force.

Under Police Rules 1975 (amended 2014) proper charge sheet along with summary of allegation were issued against him and SDPO Hayatabad was appointed enquiry officer to scrutinize the conduct of IHC Pervaiz No. 2480. He conducted enquiry proceedings & submitted finding/report in which the enquiry officer recommended the alleged IHC for major punishment as he found guilty of the charges leveled against him.

After having been gone through all the available material on record including findings/recommendations of the enquiry officer, I am fully convinced that the charges leveled against the accused officer are correct beyond reasonable doubt. Therefore, IHC Pervaiz No. 2480 is hereby awarded major punishment dismissal from service with immediate effect.

OB No. 1752

Dated: 06/07/2022

  
M. AZHAR KHAN  
SUPERINTENDENT OF POLICE,  
CANTT, PESHAWAR

No. 974/SP/Cantt dated Peshawar, the 6/7/2022.

Copy for information and necessary action to the:-

1. Capital City Police Officer, Peshawar.
2. The Sr. Superintendent of Police, Operation, Peshawar.
3. The Superintendent of Police Headquarter, Peshawar.
4. SDPO Hayatabad enquiry officers.
5. Pay Officer.
6. CRC.
7. OASI.
8. Fauji Missal branch with enquiry file for record.
9. Official concerned.

(17)









I

23

OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

ORDER.

This order will dispose of the departmental appeal preferred by Ex-IHC Pervez Khan No. 2480 who was awarded the major punishment of "Dismissal from service" by SP/Cantt: Peshawar vide OB No. 1752, dated 06.07.2022.

2- Short facts leading to the instant appeal are that the defaulter IHC while deputed to Assembly duty from Police Station Gulbahar, Peshawar was proceeded against departmentally with the allegation that SP/Cantt: Peshawar was checking the Assembly deployment on 30.05.2022 wherein the defaulter IHC was found absent from his point of duty.

3- He was issued charge sheet and summary of allegations by SP/Cantt: Peshawar. SDPO/Hayatabad Peshawar was appointed as enquiry officer to scrutinize the conduct of the accused official. The enquiry officer after conducting proper enquiry submitted his findings and recommended him for major punishment. The competent authority in light of the findings of the enquiry officer awarded the above major punishment.

4- He was heard in O.R and the relevant record along with his explanation perused. During personal hearing the appellant categorically denied the allegations and stated to be innocent in the instant case. This case merits a de-novo enquiry, so as to ensure complete fairness and impartiality. Therefore, I being appellant authority hereby reinstate the appellant in service for the purpose of de-novo enquiry. SP/Cantt: Peshawar is hereby directed to conduct de-novo enquiry afresh and take into account his overall reputation, professionalism and integrity.

OBNO: 2809  
DT: 28/10/2022

(MUHAMMAD IJAZ KHAN) PSP  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

No. 3390-92 /PA dated Peshawar the 28 / 10 /2022

Copies for information and necessary action to the:-

1. SSP/Operations Peshawar.
2. SP/Cantt: Peshawar.
3. AD-IT CCP Peshawar.
4. PO, EC-II and OASI.
5. FMC along with complete fouji missal.
6. Official concerned.

## CHARGE SHEET

24

I, Superintendent of Police, Cantt., Capital City Police Peshawar, as a competent authority, hereby, charge that IHC Pervaiz No. 2480 of Capital City Police Peshawar with the following allegations.

"You IHC Pervaiz No. 2480 while posted at PS Gulberg were found incompetent/unprofessional in the following allegations:-

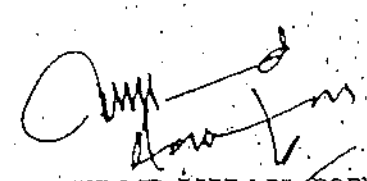
1. You were transferred from PS Hashtnagri to the police station Gulberg, vide order No. 3588-3603/EC-II dated 30.03.2022.
2. It is known from the sources that despite your transfer you have been seen mostly of the time in the police station Hashtnagri. On 31.05.2022 during visit of SDPO Cantt you were also found in PS Hashtnagri. A report to this effect was also lodged in the daily diary vide No. 27 dated 31.05.2022 at PS Hashtnagri.
3. He has links with drug dealers and gamblers and he is also involved in other corrupt practices. Being a member of discipline force his act is highly objectionable which brings bad name to police department in general.
4. This amounts to gross misconduct on your part and against the discipline of the force."

You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the Enquiry Officer committee, as the case may be.

Your written defence, if any, should reach the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person.

A statement of allegation is enclosed.



**M. AZHAR KHAN (PSP)**  
SUPERINTENDENT OF POLICE,  
CANTT: PESHAWAR

25

**DISCIPLINARY ACTION**

I, Superintendent of Police, Cantt., Capital City Police Peshawar as a competent authority, am of the opinion that IHC, Pervaiz No. 2480 have rendered themselves liable to be proceeded against under the provision of Police Disciplinary Rules-1975.

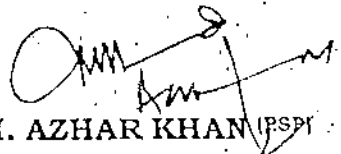
**STATEMENT OF ALLEGATION**

That IHC Pervaiz No. 2480 while posted at PS Gulberg have been found incompetent/unprofessional in the following allegations:-

1. He was transferred from PS Hashtnagri to the police station Gulberg vide order No. 3588-3603/EC-II dated 30.03.2022.
2. It is known from the sources that despite his transfer he has been seen most of the time in the police station Hashtnagri. On 31.05.2022 during visit of SDPO Cantt he was also found in PS Hashtnagri. A report to this effect was also lodged in the daily diary vide No. 27 dated 31.05.2022 at PS Hashtnagri.
3. He has links with drug dealers and gamblers and he is also involved in other corrupt practices. Being a member of discipline force his act is high objectionable which brings bad name to police department in general.
4. This amounts to gross misconduct on his part and against the discipline of the force.

For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and ASP Hayatabad is appointed as Enquiry Officer.

2. The Enquiry Officer shall, in accordance with the provisions of the Ordinance, provide reasonable opportunity of hearing to the accused officer, record his finding within 10 days of the receipt of this order, make recommendations as to punishment or other appropriate action against the accused.
3. The accused shall join the proceeding on the date time and place fixed by the Enquiry Officer.

  
**M. AZHAR KHAN (SP)**  
SUPERINTENDENT OF POLICE,  
CANTT: PESHAWAR

No. 93 /E/PA, dated Peshawar the 30/11 /2022.

1. \_\_\_\_\_ is directed to finalize the aforementioned departmental proceeding within stipulated period under the provision of Police Rules-1975.
  2. Official concerned
- na kashif* \_\_\_\_\_ *na kashif*

21.11.2022 مورخہ

2480 نمبر 2022 مورخہ 06-07-2022 مورخہ

17/11/22

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

میں نے اپنے پروفیشنل ڈیوٹی کے طور پر...

**ORDER**

L (27)

This office order will dispose of the departmental proceedings against **IHC Pervaiz No. 2480 while posted at PS Gulberg CCP Peshawar** in the following allegations:-


- He was transferred from PS Hashtnagri to the police station Gulberg vide order No. 3588-3603/EC-II dated 30.03.2022.
- It is known from the sources that despite his transfer he has been seen most of the time in the police station Hashtnagri for ulterior motives. On 31.05.2022 during visit of SDPO Cantt he was also found in PS Hashtnagri. A report to this effect was also lodged in the daily diary vide No. 27 dated 31.05.2022 at PS Hashtnagri.
- He has links with drug dealers and gamblers and he is also involved in other corrupt practices. Being a member of discipline force his act is high objectionable which brings bad name to police department in general.
- This amounts to gross misconduct on his part and against the discipline of the force.

Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation were issued against him and SDPO Hayatabad was appointed as enquiry officer to scrutinize the conduct of IHC Pervaiz No. 2480. He conducted enquiry proceedings & submitted finding/report in which the enquiry officer recommended the alleged IHC for major punishment as he found guilty of the charges leveled against him.

After having been gone through the available material on record including findings/recommendations of the enquiry officer, I am fully convinced that the charges leveled against the accused officer are correct beyond reasonable doubt. Therefore, IHC Pervaiz No. 2480 is hereby awarded major punishment dismissal from service with immediate effect.

OB No. 3354

Dated: 14/12/2022

  
**M. AZHAR KHAN (PSP)**  
SUPERINTENDENT OF POLICE,  
CANTT: PESHAWAR

No. 1783 /SP/Cantt: dated Peshawar, the 14/12/2022.

Copy for information and necessary action to the:-

1. Capital City Police Officer, Peshawar.
2. The Sr. Superintendent of Police, Operation, Peshawar.
3. The Superintendent of Police Headquarter: Peshawar.
4. SDPO Hayatabad enquiry officers.
5. Pay Officer.
6. CRC.
7. OASI.
8. Fauji Missal branch with enquiry file for record.
9. Official concerned.

بخدمت جناب CCPO صاحب

جناب عالی۔

بحوالہ چارج شیٹ مجاریہ جناب ایس۔ پی کینٹ صاحب معروض خدمت ہو کہ تھانہ گلبرگ میں تعیناتی کے دوران مورخہ 30 جولائی 2022 کو بحوالہ سیکورٹی آرڈر نمبر 1353 میں نشتر ہال انزکارڈن ڈیوٹی لگائی گئی تھی۔ لیکن اسی روز میری ڈیوٹی بحوالہ آرڈر نمبر SB/30-12621 مورخہ 2022-05-13 صوبائی اسمبلی میں بھی آڈٹر کارڈن لگائی گئی تھی۔ اس بابت میں نے ایمر جنسی کنٹرول اور تھانہ گلبرگ کو اطلاع دی کہ میری ڈیوٹی دو جگہوں پر لگوائی گئی ہے تو کنٹرول نے یہ جوابا کہا کہ تم اسمبلی ڈیوٹی جاری رکھو اور تھانہ گلبرگ کے محرر سٹاف نے کہا ہم نشتر ہال ڈیوٹی کے لئے متبادل کا بندوبست کرتے ہیں۔ اسی وجہ سے میں نے تقریباً 12 بجے ون نوید محرر اسمبلی کے ساتھ حاضری کر کے اس نے 10 نفر کنستیبلمان حوالہ کئے جن کو اپنے اپنے پوائنٹس پر لگا دیئے میں اپنی ڈیوٹی پر موجود تھا جو کہ SHO شرقی دوست محمد خان کی نگرانی ڈیوٹی سرانجام دی ہے۔ بعد میں مجھے پتہ چلا کہ جناب ایس۔ پی کینٹ صاحب نے مجھے بحوالہ مد 15 روز نامچہ 2022-05-13 اسمبلی اور نشتر ہال دونوں جگہوں پر غیر حاضری کے الزام پر غیر حاضر کیا تھا۔ مورخہ 2022-05-31 کو بحوالہ آرڈر نمبر PA/783 مجاریہ جناب ایس۔ پی کینٹ صاحب نے معطل کر کے پولیس لائن کلوز کیا تھا۔ اور بعد انکو آفری بحوالہ OB نمبر 1752 مورخہ 2022-07-06 کو جناب ایس۔ پی کینٹ صاحب نے ڈیوٹی سے غیر حاضری کے الزام پر میجر پنشنٹ کے تحت سروس سے برخواست کرنے کا آرڈر جاری کیا تھا۔ یہ کہ رات تقریباً 10:22 بجے مورخہ 2022-05-31 کو مسائل بغرض لینے اپنا سامان تھانہ ہشتنگری کیا تھا کہ اس دوران جناب ڈی۔ ایس۔ کینٹ صاحب تھانہ ہشتنگری آکر میری موجودگی کی بابت رپورٹ درج روز نامچہ کی ہے۔ جبکہ اسی دن صبح میں معطل ہوا تھا۔ جس سے خلاف مسائل نے جناب سی۔ سی۔ پی۔ او صاحب پشاور کو اجیل دائر کی تھی جس پر مسائل کو بحوالہ او۔ بی نمبری 2809 مورخہ 28.20.2022 کو نوکری پر بحال کیا گیا تھا۔

جس کے بعد دوبارہ جناب ایس۔ پی کینٹ صاحب نے انکو آفری شروع کر کے جناب ایس۔ ڈی۔ پی۔ او حیات آباد صاحب کو انکو آفری آفسر مقرر کیا جس نے بدوران انکو آفری مسائل کو چارج شیٹ دیا جس کا جواب بروقت جمع کیا گیا۔ صاحب موصوف نے بعد انکو آفری بحوالہ او۔ بی نمبری 3354 مورخہ 2022.12.14 دوبارہ میجر پنشنٹ کی سزا سناتے ہوئے نوکری سے برخواست کر دیا گیا ہے۔ یہ کہ مسائل نہ کسی منشیات فروش یا قمار باز کے ساتھ ملا ہوا ہے اور نہ کبھی کسی جرائم پیشہ فرد/آفراد کی پشت پناہی کی ہے۔ مسائل نے مختلف تھانہ جات میں بطور محرر ڈیوٹی سرانجام دی ہیں اور کبھی بھی افسران بالا کو شکایت کا موقع نہیں دیا ہے۔ یہ کہ مسائل تھانہ ہشتنگری میں 01.04.2021 تا 01.04.2022 بعدہ محرر تعینات رہا اس دوران آفسران (ایس۔ ایچ۔ او اور ڈی۔ ایس۔ پی) صاحبان نے مختلف اوقات میں قمار بازوں اور منشیات فروشوں کے خلاف کاروائیاں کرتے ہوئے جتنے بھی ملزمان گرفتار کئے تھے انکے خلاف بروقت مقدمات درج رجسٹر ہو چکے ہیں (تفصیل مقدمات ہمراہ لف ہیں)۔ مسائل نے اپنی ڈیوٹی نہایت ایمان داری اور جانفشانی سے سرانجام دی ہے۔ استدعا ہے کہ مسائل کی 26 سالہ نوکری کو مد نظر رکھتے ہوئے مسائل کا نوکری پر بحالی کا اجازت اجیل منظور فرما کر نوکری پر بحال کرنے کی

احکامات صادر فرمایا جائے۔ مسائل تاحیات دعا گو رہے گا۔

آپکا تابع فرمان۔ IHC پرویز خان نمبر 2480 متعینہ پولیس لائن پشاور

مورخہ 28.12.2022

OFFICE OF THE  
CAPITAL CITY POLICE OFFICER  
PESHAWAR

**ORDER**

This order will dispose of the Departmental appeal preferred by Ex-HC Parveiz Khan No. 2480, who was awarded the major punishment of "Dismissal from service" under KP PR-1975 by SP/Cantt: Peshawar vide OB No. 33 dated 14.12.2022.

Short facts leading to the instant appeal are that the defaulter IHC while posted at Police Station Gulberg Peshawar was proceeded against departmentally on the following charges.

- i. He was transferred from PS SGH Gulberg but he was seen most of the time in the PS SGH for ulterior motive his presence at PS SGH, a daily dairy report No. 27 dated 31.05.2022 was also lodged at PS SGH by the SDPO Cantt while paid visit to PS SGH.
- ii. He has links with drug dealers and gamblers and was also involved in other corrupt practices which brought bad name to the Police Department in general.

He was issued proper charge Sheet and summary of Allegations by SP/Cantt Peshawar. SDPO/Hayatabad Peshawar was appointed as Enquiry Officer to scrutinize the conduct to the accused official. The enquiry Officer after proper inquiry submitted his findings in which in which the allegations against the allegation against the defaulter office were established. The competent authority to light of the findings of the enquiry officer awarded in the above punishment.

He was heard in person in O.R and the relevant record along with his explanation perused. During personal hearing that the appellant stated that that 31.05.2022 he came to PS SGH for collecting of his uniform and other necessary items Police Station Gulberg due to his transfer from Police Station SGH. In the meanwhile Cantt came to the Police Station and received DD report against him. He pleaded he has no malafide intention on his part for his presence in Police Station SGH and requested for reinstatement in Service. Keeping in view his plea, his appeal for reinstatement in service is hereby accepted. He is hereby reinstated in service with immediate effect. The punishment order of SP/Cantt Peshawar is hereby converted into reduction in rank. No benefit is granted for the period he remained out of converted into reduction in rank. No benefit is granted for the period he remained out of Service.

MUHAMMAD IJAZ KHAN  
CAPITAL POLICE OFFICER,  
PESHAWAR



OFFICE OF THE  
CENTRAL CITY POLICE OFFICER  
PESHAWAR

ORDER

This order will dispose of the departmental appeal preferred by En-BC Verwar  
Pr No. 2489, who was awarded the prior punishment of "Dismissal from service" under  
PR-1975 by SFC/Canal Peshwar vide GB No. 33 dated 14.12.2022.

Short facts leading to the appeal are that the defaulter H/C while posted at  
Police Station Gulberg Peshwar was proceeded against departmentally on the following  
charges-

1. He was transferred from PS SGI to  
Gulberg but he was seen most of the time  
in the PS SGI for which a memo was  
dated report No. 27, dated 31.05.2022  
was also lodged in PS SGI by the SDPO  
Canal, who had visited PS SGI.

2. He has links with drug dealers and  
gamblers and was also involved in other  
corrupt practices which might lead to  
the issue of Summary of Allegations by SFC/Canal.

He was issued proper Charge Sheet  
and Summary of Allegations by SFC/Canal  
in the PS SGI for which a memo was  
dated report No. 27, dated 31.05.2022  
was also lodged in PS SGI by the SDPO  
Canal, who had visited PS SGI.

3. He was issued proper Charge Sheet  
and Summary of Allegations by SFC/Canal  
in the PS SGI for which a memo was  
dated report No. 27, dated 31.05.2022  
was also lodged in PS SGI by the SDPO  
Canal, who had visited PS SGI.

4. He was issued proper Charge Sheet  
and Summary of Allegations by SFC/Canal  
in the PS SGI for which a memo was  
dated report No. 27, dated 31.05.2022  
was also lodged in PS SGI by the SDPO  
Canal, who had visited PS SGI.

5. He was issued proper Charge Sheet  
and Summary of Allegations by SFC/Canal  
in the PS SGI for which a memo was  
dated report No. 27, dated 31.05.2022  
was also lodged in PS SGI by the SDPO  
Canal, who had visited PS SGI.

6. He was issued proper Charge Sheet  
and Summary of Allegations by SFC/Canal  
in the PS SGI for which a memo was  
dated report No. 27, dated 31.05.2022  
was also lodged in PS SGI by the SDPO  
Canal, who had visited PS SGI.

7. He was issued proper Charge Sheet  
and Summary of Allegations by SFC/Canal  
in the PS SGI for which a memo was  
dated report No. 27, dated 31.05.2022  
was also lodged in PS SGI by the SDPO  
Canal, who had visited PS SGI.

8. He was issued proper Charge Sheet  
and Summary of Allegations by SFC/Canal  
in the PS SGI for which a memo was  
dated report No. 27, dated 31.05.2022  
was also lodged in PS SGI by the SDPO  
Canal, who had visited PS SGI.

9. He was issued proper Charge Sheet  
and Summary of Allegations by SFC/Canal  
in the PS SGI for which a memo was  
dated report No. 27, dated 31.05.2022  
was also lodged in PS SGI by the SDPO  
Canal, who had visited PS SGI.

10. He was issued proper Charge Sheet  
and Summary of Allegations by SFC/Canal  
in the PS SGI for which a memo was  
dated report No. 27, dated 31.05.2022  
was also lodged in PS SGI by the SDPO  
Canal, who had visited PS SGI.

1205-51-DA  
16/01/2023

MULHAMMAD HUSSAIN PSP  
CENTRAL CITY POLICE OFFICER  
PESHAWAR

89



7825/023  
14/12/2022

میں نے یہ درخواستیں کی ہیں۔

1. 28.20.2022ء کو 2809 نمبر پر اپنی درخواستیں کی تھیں۔

2. 06.07.2022ء کو 1752 نمبر پر اپنی درخواستیں کی تھیں۔

3. 31.05.2022ء کو 783/PA نمبر پر اپنی درخواستیں کی تھیں۔

4. 15.05.2022ء کو 130-05-2022 نمبر پر اپنی درخواستیں کی تھیں۔

5. 12.05.2022ء کو 102 نمبر پر اپنی درخواستیں کی تھیں۔

6. 13.05.2022ء کو 12621-30/SB نمبر پر اپنی درخواستیں کی تھیں۔

7. 30.05.2022ء کو 30 نمبر پر اپنی درخواستیں کی تھیں۔

8. 1353 نمبر پر اپنی درخواستیں کی تھیں۔

میں نے یہ درخواستیں کی ہیں۔

1353 نمبر پر اپنی درخواستیں کی تھیں۔

یہ کہ سائل نہ کسی منشیات فروش یا قمار باز کے ساتھ ملا ہوا ہے اور نہ کبھی کسی جرائم پیشہ فرد / افراد کی پشت پناہی کی ہے۔ سائل نے مختلف قبائلی جات میں بطور محرر ڈیوٹی سرانجام دی ہیں اور کبھی بھی انفران بالا کو شکایت کا موقع نہیں دیا ہے۔ یہ کہ سائل قبائلی اشتہاری میں 01.04.2022 تا 01.04.2022 بعہدہ محرر تعینات رہا اس دوران آفسران (ایس۔ ایچ۔ آد اور ڈی۔ ایس۔ پی) صاحبان نے مختلف اوقات میں قمار بازوں اور منشیات فروشوں کے خلاف کارروائیاں کرتے ہوئے جتنے بھی ملزمان گرفتار کئے تھے ان کے خلاف بروقت مقدمات درج ہو چکے ہیں (تفصیل مقدمات مہر ارفب ہیں)۔ سائل نے اپنی ڈیوٹی نہایت ایمان و اہمیت اور جانفشانی سے سرانجام دی ہے۔

اب جناب سی سی پی او صاحب پشاور نے بحوالہ آرڈر نمبر PA/1825-31 مورخہ 26-04-2023 کو ایس پی کینٹ کی وی ہوئی سزا پر مشتمل، محکمہ کے سائل کو ذیل سزا دی گئی ہے۔

"He is reinstated in service with immediate effect. The punishment order of SP/Cantt Peshawar is hereby converted into reduction in rank. No benefit is granted for the period he remained out of service".

استدعا ہے کہ سائل کی سوا عہدے سے تنزیلی کی سزا ختم کر کے سائل کو اپنے سابقہ رینک پر بحال کیا جائے اور دیگر مراعات بھی بحال کرنے کے احکامات صادر فرمایا جائے۔ سائل تاحیات دعا کر رہے گا۔

آپ کا تابع فرمان۔ HC پرویز خان نمبر 2480 متعینہ پولیس لائن پشاور

مورخہ 28-04-2023

Better Copy

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
Khyber Pakhtunkhwa  
Peshawar

ORDER

This order is hereby passed in dispose of revision petition under 11-A of Khyber Pakhtunkhwa Police Rules 1975 (amended 2014) submitted by HC Parvaiz Khan (the then IHC No 24800. The appellant was awarded **major** punishment of dismissal from service by SP Cantt Peshawar vide OB No 3354 dated 14.12.2022 on the allegation he while posted at PS Gulbarg Peshawar was transferred from PS SGH to PS Gulberg but he has seen most of the time in the PS SGH for ulterior motive and regarding his Presence at PS SGH a DD report No . 27 dated 31.05.2022 was also lodged at PS SGH by the SDPO Cantt. While he paid visit to PS SGH. He has links with drugs, dealers and gamblers and was also involved in other corrupt practices which brought had name to the Police department in general.

The appellate authority i.e CCP Peshawar accepted his appeal, reinstated him into service and converted the punishment order into reduction in rank with no benefit granted for the period remained out of service vide OB No. 960, dated 26.04.2023.

Meeting of appellate Board was held on 25.07.2024 wherein petitioner was heard in person. the Petitioner denied the allegations leveled against him.

Perusal of enquiry papers revealed that the allegation leveled against the petitioner has been proved. The Petitioner failed to submit any cogent reason in his self defense. The board sees no ground and reason for acceptance of this petition, therefore, his petition is hereby rejected.

Sd

Additional Inspector General of Police  
Hqrs Peshawar

Dated 06.08.2024

AWAL KHAN, PSP

- 1. Copy of the above is forwarded to the
- 2. Special City Police Officer, Hyderabad, for his information.
- 3. Memo No. 1385 of 11 dated 09/08/2023 is returned to the originator.
- 4. SP, Amnonger, Peshawar
- 5. Additional District Police Officer, Peshawar
- 6. P.A. to Additional District Police Officer, Peshawar
- 7. P.A. to District Officer, Peshawar

AWAL KHAN, PSP  
Additional District Police Officer, Peshawar

For the receipt of his portion, it will be sent to the originator. If any further information is required, please contact the originator.

AWAL KHAN, PSP  
Additional District Police Officer, Peshawar

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
PESHAWAR



P-32

15. 07. 2022

15. 07. 2022

~~15. 07. 2022~~

1. 15. 07. 2022  
 2. 15. 07. 2022  
 3. 15. 07. 2022  
 4. 15. 07. 2022  
 5. 15. 07. 2022  
 6. 15. 07. 2022  
 7. 15. 07. 2022  
 8. 15. 07. 2022  
 9. 15. 07. 2022  
 10. 15. 07. 2022  
 11. 15. 07. 2022  
 12. 15. 07. 2022  
 13. 15. 07. 2022  
 14. 15. 07. 2022  
 15. 15. 07. 2022

15. 07. 2022



R (34)

OFFICE OF THE  
DEPUTY SUPERINTENDENT OF POLICE,  
HAYATABAD SUB-DIVISION, PESHAWAR.



No. 29-E /PA, dated Posh: the 06/07 /2022

**FINDING REPORT U/R 6(5) OF POLICE RULES 1975, AGAINST ASI  
PERVAIZ NO. 2480 WHILE POSTED AT PS GULBARG.**

Please refer to your office Endt: No. 46-A/E/PA, dated 02.06.2022; pertaining to departmental enquiry against ASI Pervaiz No. 2480 while posted at PS Gulbarg on the basis of following allegations/grounds.

**STATEMENT OF ALLEGATION:**

That ASI Pervaiz No. 2480 while posted at PS Gulbarg have been found incompetent/unprofessional. It is the evident that his assembly duty was imposed. On 30.05.2022 the W/SP Cantt: checking the assembly deployment but he was not found.

Such lethargic attitude on his part reflects grave negligence, non-seriousness, insubordination and lack of responsibility and discipline. This amounts to gross misconduct on his part and against the discipline of the force.

**PROCEEDINGS:**

Enquiry officer provided reasonable opportunity to ASI Pervaiz No. 2480. Statement of allegation was served upon him and his written reply was recorded.

**FINDINGS:**

Having gone through relevant record, statement of the alleged Police official, cross examination, previous service record, information about his character/activities in force, following conclusion/findings are observed:-

That the alleged officer has not complied the orders regarding duty assigned to him. After he was checked, he has rushed to the point to avoid action against him.

Being duty of immense importance, the lethargic approach of alleged official in Provincial Assembly duty cannot be ignored, as any untoward incident due to indiscipline approach of police officer in such an important place can badly damage the image of Police force, for which precious lives have been sacrificed.

**CONCLUSION:**

Keeping in view, above mentioned observations being enquiry officer am of the view that the alleged officer may be awarded major punishment.

All relevant documents are enclosed herewith.

**MUHAMMAD INAM JAN**  
Deputy Superintendent of Police,  
Hayatabad: Sub-Division,  
Peshawar.

Worthy Superintendent of Police,  
Cantt: Peshawar.

No. 29 /E/St, dated Peshawar the 06 / 07 / 2022.

*Dismissal from service*

VAKALAT NAMA

NO. \_\_\_\_\_ /2024

IN THE COURT OF HP Service Tribunal Peshawar

Peroiz Khan

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Police Deptt.

(Respondent)  
(Defendant)

I Peroiz Khan (Appellant), Do hereby appoint and constitute **SYED NOMAN ALI BUKHARI, Advocate High Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

Dated \_\_\_ / \_\_\_ /2023

Peroiz  
(CLIENT)

ACCEPTED

Syed Noman Ali Bukhari  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE HIGH COURT,

Uzma Syed  
Uzma Syed  
ATC

**OFFICE:**  
Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar  
Cell No. 0306-5109438