


FORM OF ORDER SHEET

Court of _____

Appeal No. 1496/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/09/2024	<p>The appeal of Mr. Fazal Rehman resubmitted today by Mr. Javed Iqbal Gulbela Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Fazal Rehman received today i.e on 13.09.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- ✓ Address of appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- ✓ Memorandum of appeal is not signed by the appellant.
- 3- ✓ Affidavit is not attested by the Oath Commissioner.
- 4- Appeal has not been flagged/marked with annexures marks.
- 5- Page no. 12 to 17 of the appeal are illegible.
- 6- Four more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 776 /Inst./2024/KPST,

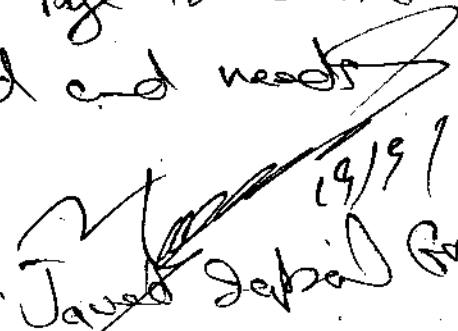
Dt. 13/9 /2024.


ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Javed Iqbal Gulbeia Adv.
High Court at Peshawar.

Respected Sir!

Re-submitted after removal of objection. Memoranda page 12 to 16 are ^{now} part of record and needs no better copy.


19/9/2024
Javed Iqbal Gulbeia
(A.S.C.)

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Service Appeal No. 1496 /2024

Fazal Rehman

VERSUS

CCPO Peshawar & others

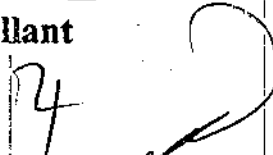
INDEX

S NO.	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1.	Grounds Of the Appeal		1-4
2.	Affidavit		5
3.	Addresses Of Parties		6
4.	copies of Awards	"A"	7,8
5.	Copy of the Impugned Dismissal Order No. 1021/PA-DPO- Khyber, of the office of District Police Officer, Khyber, Dated: 04-03-2024	"B"	9
6.	Copies of Departmental Appeal bearing Diary No.119 PA-CCPO/2024 Dated: 21-03-2024 And impugned Order No. 4913-17/PA/CCP- Peshawar, Dated: 16-08-2024 of the office of Capital city Police Officer, Peshawar,	"C & D"	10,11
7.	Copies of FIRs	"E"	12-16
8.	Other Documents	"F- F/III"	17-19
9.	Wakalat Nama		20

Dated: 13-09-2024


Appellant

Through


Javed Iqbal Gulbela
Advocate Supreme Court,
Pakistan


Saghir Iqbal Gul Bela
Advocate High Court.

①

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR

Service Appeal No. _____/2024

Fazal Rehman (Ex-constable belt no. 1106) District Khyber,

(WU) s/o Tehsil Landi Kotal, District, Khyber. Appellant

VERSUS

1. Capital city Police Officer Peshawar.
2. District Police Officer, Khyber.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 15780

Dated 13-09-2024

.....Respondent

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT -1974 AGAINST THE
IMPUGNED OFFICE ORDER NO. 1021/PA-DPO- KHYBER,
DATED: 04-03-2024 OF THE OFFICE OF DISTRICT POLICE
OFFICER, KHYBER; WHEREBY THE APPELLANT HAS
BEEN ILLEGALLY DISMISSED FROM HIS SERVICE AND
DEPARTMENTAL APPEAL BEARING DIARY NO.119 PA-
CCPO/2024 OF THE APPELLANT DATED: 21-03-2024 HAS
BEEN TURNED DOWN VIDE IMPUGNED ORDER NO.
4913-17/PA/CCP- PESHAWAR, DATED: 16-08-2024 OF THE
OFFICE OF CAPITAL CITY POLICE OFFICER
PESHAWAR, IN A CLASSICAL, CURSORY AND
WHIMSICAL MANNER.

Respectfully Sheweth,

1. That after going through mandatorily required criteria, and after being envisaged with the ordeals and inquisition of selection process, the Appellant got inducted onto the rolls of the prestigious police force of the province, as constable.
2. That thereafter the Appellant took charge & with his most sincere and pragmatic way, performed his duties with full zest and devotion & never left any stone unturned in performance of his duties and have always won

Award, felicitations and appreciations of his High-up at certain junctures due to his Mantle whetted skills, punctuality and behavior. The appellant performed various duties at Landi Kotal District Khyber, with dedication and commitment. (copies of Awards are annexed as Annexure "A")

- 3. That on 04-03-2024, an Impugned Order No. 1021/PA-DPO- Khyber, of the office of District Police Officer, Khyber, where the appellant was dismissed from service. (Copy of the Impugned Dismissal Order No. 1021/PA-DPO- Khyber, of the office of District Police Officer, Khyber, Dated: 04-03-2024 is annexed as "B")
- 4. That feeling aggrieved, the Appellant moved a Departmental Appeal bearing Diary No.119 PA-CCPO/2024 Dated: 21-03-2024 to Capital City Police Officer, Peshawar, which has been turned down vide impugned Order No. 4913-17/PA/CCP- Peshawar, Dated: 16-08-2024 of the office of Capital city Police Officer Peshawar, in a classical cursory and in whimsical manner. (Copies of Departmental Appeal bearing Diary No.119 PA-CCPO/2024 Dated: 21-03-2024 And impugned Order No. 4913-17/PA/CCP- Peshawar, Dated: 16-08-2024 of the office of Capital city Police Officer Peshawar, are annexed as annexure "C & D")
- 5. That the Appellant arrested and lodged FIRs against the Narcotics smuggler which proved the excellence performance of the appellant.(Copies of FIRs are annexed as annexure "E")
- 6. That due to honesty and best performance of the appellant the respondents appointed the appellant as additional SHO of PS Landi Kotal, Khyber, inspite of the facts that the appellant is constable
- 7. That feeling highly aggrieved and having no other remedy, the Appellant approaches this August Tribunal for recognition, acknowledgment and enforcement of his due rights and for reinstatement into service with all back benefits, upon the following grounds inter alia:-

GROUND:

A. That the Appellant is a naturally born bona-fide citizen of Islamic Republic of Pakistan and is fully and equally, on equality basis, entitled to and basic and fundamental rights on enshrined in the fundamental law of the land, interpreted, acknowledge, and enforced by the law of the land and any discrimination or unfettered exercise of discretionary powers public functionaries is always chucked away and chucked down by law and law court of the land.

- B. That it is a cherished principle of law that where a law requires a thing to be done in a particular manner, the same is to be done in that manner and not otherwise.
- C. That the impugned dismissal order as well as the impugned appellate order are illegal, unlawful and void ab initio and liable to be struck down.
- D. That the impugned dismissal order is unwarranted, illogical and against the Rules so therefore not maintainable at all.
- E. That no proper inquiry was ever conducted in case of the appellant, nor the appellant was ever heard in person, nor was ever allowed to cross examine any witness and thus the appellant was condemned unheard.
- F. That the appellant perform his duty with full zest and zeal, and it is the reason that the respondents not only awarded appreciation certificates, but also appreciated his excellent performance, therefore the impugned orders have no locus standi in the eye of laws, and are liable to be set aside.
- G. That the appellant successfully launched operation against the narcotics smugglers, which is evident front the registration of several FIR's. Therefore, the allegations against the appellant are false, concocted and based on hallucination.
- H. That the appellant has neither posted at international border in between Pakistan and Afghanistan, nor any duty had been assign to the appellant in respect of the said border, rather the FC Force of Pakistan, Custom Force of Pakistan, Excise and Taxation Force of Pakistan and Pak Army are deputed on the international border and responsible for all type of security including controlling of narcotics activities, terrorism activities etc, therefore the allegations of the smuggling against the appellant are totally false and fabricated and therefore are liable to be set aside.
- I. That not only the dismissal order from service is illegal, unlawful, void-ab-initio but the rejection of departmental appeal by the Respondents are also against the law and rules governing the subject, therefore not sustainable in the eye of law and need to be set aside in the best interest of justice.
- J. That the appellant belongs to a poor family, and is the only earning hand in the whole family to look after them.
- K. That from every angle the appellant is liable to be re-instated into service with all back benefits.

L. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.


It is, therefore most humbly prayed that on acceptance of the instant appeal, the impugned Office Order No. 1021/PA-DPO- Khyber, Dated: 04-03-2024 of the office of District Police Officer, Khyber and impugned Order No. 4913-17/PA/CCP- Peshawar, Dated: 16-08-2024 of the office of Capital city Police Officer Peshawar may kindly be set aside and by doing the appellants be reinstated into service with all back benefits.


Any other relief not specifically ask for may also graciously be extended in favor of the Appellant in the circumstances of the case.

Dated: 13-09-2024



Appellant

Through


Javed Iqbal Gul Bela
(ASC)

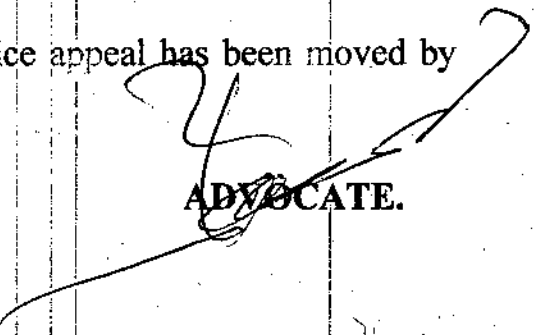

Saghir Iqbal Gul Bela.
(AHC)


Alamzeb Khan


M. Arif Mohmand
(Advocates)

NOTE:

That as per information of my client, no such service appeal has been moved by the Appellant, prior to this one.


ADVOCATE.

(5)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

Fazal Rehman

VERSUS

IGP

AFFIDAVIT.

Khan

I, Fazal Rehman S/o Kheyal BDR Tehsil
Landi Kotal, District Khyber, do hereby solemnly
affirm and declare on oath that the contents of
accompanied Service Appeal are true and correct to the
best of my knowledge and belief and nothing has been
concealed from this Hon'ble Court.

DEPONENT

CNIC # 21203 21510031

Cell No. 0301-8969522

Identified by:
Javid Iqbal Gulbela
ASC



**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

Service Appeal No. _____ /2024

Fazal Rehman
VERSUS
CCPO Peshawar & others

ADDRESSES OF THE PARTIES

ADDRESSES OF THE APPELLANTS:

Fazal Rehman (Ex-constable belt no. 1106) District Khyber.

ADDRESSES OF THE RESPONDENTS:

- 1. Capital city Police Officer Peshawar.**
- 2. District Police Officer, Khyber**

Dated: 13-09-2024

Appellant

Through

Javed Iqbal Gulbela
Advocate Supreme Court,
Pakistan.

(7)

Amir A.



DISTRICT POLICE OFFICER
KHYBER



COMMENDATION CERTIFICATE

CC-III

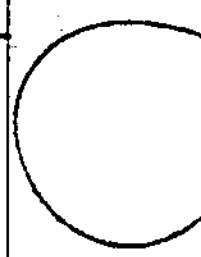
1111

Granted Rs

Fazal Rahman B.No 1106

for his good performance of duty with cash reward Rs. 1000/-

DISTRICT



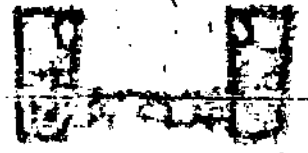
District Police Officer
Khyber

No. 3874 /PSO-Khyber,

Date: 06/06/2023

RECEIVED
District Police Officer
Khyber
Supreme Court of Pakistan
(Scri# 5317)

8



DISTRICT POLICE OFFICER
KHYBER



COMMENDATION CERTIFICATE

CC-III

COMMITTEE
Khyber District Police Officer

for his good performance of duty with cash reward Rs. _____

As per order of the District Police Officer

No. 1519 P.S.O. Khyber.
Date 24/10/2022

District Police Officer
Khyber

JAVED IQBAL GULBELA
Advocate
Supreme Court of Pakistan
10SC#52171

9



**OFFICE OF THE
DISTRICT POLICE OFFICER
KHYBER**

Tel: 091-5862033 Fax: 091-5864478
Email: dpokhyber1@gmail.com



No. 1021 /PA-DPO Khyber

Dated: 04/03/2024

Ann - "B"

DISMISSAL ORDER

FC Fazal Rehman No. 1106 of District Police Khyber, while he was posted as Addl. SHO Landi Kotal was issued with Charge Sheet No. 7893/PA-DPO Khyber dated 25/10/2023 due to his alleged contacts with drug peddlers and provision of safe passages to them.

Thus, a departmental inquiry was initiated against him. During the inquiry proceedings he was given the chance to produce written documentary proof in his defense and appear before the Inquiry Officer. He availed both but failed to submit anything in his defense. Local sources revealed that he did involve in the contacts with drug peddlers and provided safe passages to smugglers through his area of jurisdiction. That, he was in contact with international smugglers who are involved in smuggling of drugs between Afghanistan and Pakistan. Thus, he was found guilty of the said misconduct and is recommended for major punishment.

The undersigned, as per the recommendation of the inquiry officer, being the competent authority is satisfied about his involvement in criminal abetment and drug peddling and in order to maintain discipline in the force hereby awards the delinquent official with Major Punishment of Dismissal from Service as per Section 4-b(iv) of Police (E&D) Rules 1975 (With Amendments - 2014).

Capt. © SALEEM ABRAS KULACHI (PSP)
DISTRICT POLICE OFFICER,
KHYBER

OB No. 313 /dated 04/03/2024
No. 1022-25 /PA - DPO Khyber
Copies to:

1. DSP HQrs, Khyber
2. OHC, DPO Khyber for Record
3. Accountant, DPO Khyber for Stoppage of Pay
4. Service Record Branch/ HRMIS for Service Record, Good/Bad Entries

JAWAID BAL GULBERA
Advocate
Supreme Court of Pakistan
(ABC # 5317)

بخدمت جناب کیپٹل سٹی پولیس آفیسر صاحب پشاور

Anna C

138
66/7/24
Duty Supplement
Sd/-
66/7/24

درخواست برائے لوگوکری سٹال

Dy: No. 119 PA-CCPO
Dt: 2/07/24
Encl: جناب عالی

موزبانہ گزارش ہے۔ کہ سائل مطلع خیر علاج لڈیکوٹس کے ایک اہلیت شریف اور سسر خاندان نے تعلق رکھتے ہیں۔ سائل نے پچھلے میں (20 سال سروس میں آفسران بالا کو معمولی شکایت کا موقع تک نہیں دیا ہے اور نہ بھی ڈیوٹی میں غفلت کیا ہے۔ یہ کہ سائل تقریباً 15 سال پہلے علاج لڈیکوٹس میں ایڈیشنل ایس ایچ او کے پوسٹ پر تھا، لیکن کچھ ایکاروں نے سائل کے خلاف ایک افواہ بنا کر یہ شکایت فروغ کیا تھا مابو ہے جس سے سائل ابھی تک خیر بھی نہیں۔ لیکن آفسران بالانے سائل کے خلاف انکواری مقرر کی۔

سائل نے انکواری آفیسر کو زبانی و تحریری حلفیہ بیان دی کہ سائل پر لگانے گئے الزامات سراسر سمن گھڑت، جھوٹی اور کچھ ایکاروں کی صرف ایک سازش ہے۔ سائل اب بھی حلفیہ بیان دیتا ہوں کہ میں نے کبھی بھی کسی شکایت فروغ یا سنسکر کیا تھا کوئی خاندان یا کوئی رولہ نہیں رکھا۔ مزید یہ کہ علاج لڈیکوٹس میں ایس ایچ او کے حکم احکام کے بغیر کوئی ایڈیشنل ایس ایچ او یا چوکی اہلکار کوئی کارروائی وغیرہ نہیں کر سکتا۔ سائل نے بحوالہ طلت نمبر: 36 مورخہ: 04.02.2024 جرم: 34-CNSA-11c-186-353-324 علاج لڈیکوٹس میں گاڑی سے 10500 گرام آفس برآمد کے اور طرہ نے ہم پولیس پارٹی پر بارادہ لٹل ٹارگٹ کی۔ اس کے علاوہ سائل طلت نمبر: 205 مورخہ: 21-08-2023، طلت نمبر: 129 مورخہ: 26-07-2022 اور اسکی طرح بہت سارے FIR کے ہیں جس میں مجموعی طور پر 74500 گرام ہیرن، 38320 گرام آفس اور 5000 گرام کیمیکل برآمد کر کے ساتھ شکایت میں لوٹ لٹیاں بھی کر لیا کے ہیں۔ جس میں انکی طرہان کو عرقہ کی سزا بھی سنائی گئی ہے۔ FIR کی کاپی در خواست کیا تھا لف تاہن ملاحظہ ہے۔

مختصر یہ کہ سائل کسی شکایت فروغ یا سنسکر کیا تھا کسی قسم تعلق نہیں یا روہٹ نہیں اور نہ لڈیکوٹس میں کوئی ثبوت موجود ہے بلکہ صرف کسی کے جھوٹی شہادت پر لوگوکری سے برخواست کیا ہے۔

آپ صاحبان سے بذریعہ درخواست عاجزانہ استدعا کی جاتی ہے کہ سائل کو دامن اپنی لوگری پر سہل کرنے کا حکم صادر فرما کر سکھور فرمائیں سائل تاحیات دعا گو رہیگا۔

میں نوازش ہوگی

العارض

آپ کا تابع احکم سابقہ کا سبیل فضل الرحمان
نمبر: 1106
پتہ: تحصیل لڈیکوٹس ضلع خیر
رابطہ نمبر: 0301-8969522/0321

Handwritten signatures and stamps, including a date stamp: 07.07.2024

9780078

JAVED IQBAL GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

21



OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR

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

Ann-D

ORDER

This order will dispose of the departmental appeal preferred by Ex-Constable Fazal Rehman No. 1106, who was awarded the major punishment of "dismissal from service" under KP PR-1975 (amended 2014) by DPO Khyber vide order No. 1021/PA, dated 04.03.2024.

2- Brief facts leading to the instant appeal are that the defaulter Constable while posted as Additional SHO PS Landi Kotal, District Khyber was proceeded against departmentally on the charges that he was found involved in contacts with drug peddler, smuggling and collecting monthlies in his area and there were running hotspot in his area for drug activities but he failed to operate against them.

3- He was issued Charge Sheet and Summary of Allegations by DPO Khyber. SP/Investigation, Khyber was appointed as Enquiry Officer to scrutinize the conduct of the accused official. The Enquiry Officer after conducting departmental enquiry submitted his findings in which he was recommended for major punishment. The competent authority in light of the findings of the Enquiry Officer awarded him the major punishment of dismissal from service.

4- He was heard in person in Orderly Room. During personal hearing, he was given an opportunity to prove his innocence. However, he failed to submit any plausible explanation in his defense. Therefore, his appeal for setting aside the punishment awarded to him by DPO Khyber vide order No. 1021/PA, dated 04.03.2024 is hereby rejected/filed.

"Order is announced"

CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 4913-17 /PA/CCP, dated Peshawar the 16/1 08/2024

Copies for information and necessary action to the:-

1. District Police Officer Khyber; along with complete inquiry file.
2. DSP/IQrs Khyber.
3. Accountant & OASI Khyber.
4. Official concerned.

JAVED ICHHA GULBELA
Advocate
Supreme Court of Pakistan
(A5K # 5017)

14/02/2023

Handwritten text in Urdu, appearing to be a detailed legal argument or petition. The text is dense and covers most of the upper half of the page.

38	384,353,186,112888-34
36	384,353,186,112888-34
35	384,353,186,112888-34
34	384,353,186,112888-34
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32	384,353,186,112888-34
31	384,353,186,112888-34

Handwritten text at the bottom of the page, including a signature and possibly a date or reference number. There is a circled number '12' in the bottom left corner.

ADVOCATE
COURT OF PEACE
JUDGE
JSC # 5377

Handwritten text in a cursive script, possibly Arabic or Persian, appearing as bleed-through from the reverse side of the page. The text is mostly illegible due to heavy shadowing and noise.

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Handwritten Urdu text at the bottom of the page, including a signature and possibly a date or reference number. A circled number '16' is visible in the bottom left corner.

OFFICE OF THE
DISTRICT POLICE OFFICER
KHYBER
Tel: 091-5861 93



Ann - F

No. 7845/PA-DPO Khyber

Dated: 25/10/2023

CHARGE SHEET UNDER SECTION 5(1(a)) OF POLICE RULES 1975

1. I, Capt. @ Saleem Abbas Kulachi (PSP), District Police Officer, Khyber, as a competent authority, hereby charge FC Shoaib Khan No. 1125 of District Police Khyber as per the following allegations:

"As per learned sources, reportedly you, FC Shoaib Khan No. 1125 of District Police Khyber while posted at PS Landi Kotal, have been involved in contact with narcotics peddlers and smugglers. That you have provided safe passage to the narcotics smugglers in your area of jurisdiction and remained involved in contacts with them. In return, you received bribes from them. Such corrupt activities and criminal abetment come under the meaning of Misconduct."

2. By the above-mentioned reasons, you appear to be guilty of Misconduct as per Police Rules, 1975 and that you have rendered yourself liable to all or any of the penalties specified in Police Rules, 1975.

3. Therefore, you are directed to submit your written defense within 07 days of the receipt of this Charge Sheet to the Inquiry Officer, as the case may be.

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

5. State whether you desire to be heard in person or not.

Capt. SALEEM ABBAS KULACHI (PSP)
DISTRICT POLICE OFFICER,
KHYBER

Copies to

- 1: SP Inv. Khyber for initiation of Inquiry
- 2: HRMS and Service Record Branch for record Profile (s) update
- 3: FC Shoaib Khan No. 1125 for information and compliance

IP inv

2023-10-25

JAVED IGC GULBELA
Magistrate
Supreme Court of Pakistan
(ASC # 5317)

Better Copy

(17)
A.F.

OFFICE OF THE
DISTRICT POLICE OFFICER
KHYBER

Tel: 091-5861033

No.7895/PA-DPO Khybe

dated 25/10/2023

CHARGE SHEET UNDER SECTION i(a) OF POLICE RULES 1975

1. I, Capt. @ Saleem Abbas Kulachi (PSP), District Police Officer, Khyber as a competent authority hereby charge FC Shoaib Khan No. 1125 of District Police Khyber as per the following allegations:

"As per learned source reportedly you FC Shoaib Khan 1125 of District Police Khyber while posted at PS Landi Kotal have been involved in contact with narcotics peddlers and smugglers. That you have provided safe passage to the narcotics smugglers your area of jurisdiction and remained involved in contacts with them. In return you received bribes from them. Such corrupt activities and criminal abetment come under the meaning of Misconduct."

2. By the above-mentioned reasons, you appear to be guilty of Misconduct as per police Rules 1975 and that you have rendered yourself liable to all or any of the penalties specified in Police Rules, 1975.
3. Therefore, you are directed to submit your written defense within 07 days of the receipt of this Charge Sheet to the Inquiry Officer as the case may be.
4. Your written defense, if any should reach the inquiry officer within the specified period, failing to which it shall be presumed that you have no defense to put in and, in that case, ex-parte action shall follow against you.
5. State, whether you desire to be heard in person or not.

**SALEEM ABBAS KULACHI (PSP)
DISTRICT POLICE OFFICER
KHYBER**

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18

F/I

FRP

CHIEF OF POLICE
DISTRICT
KHYBER



Phone No. 0917259003

Dated: 14/02/2024

114
The District Police Officer,
Khyber

Subject: FINDING OF ENQUIRY AGAINST THE CONSTABLE FC FAZAL REHMAN NO. 1106

Respected Sir,

It is submitted that the matter was probed thoroughly and the following steps have been followed during the course of enquiry.

Allegations in the Order:

It is alleged in the order issued by DPO Khyber Vide No. 7893/PA-DPO Khyber dated 25/10/2023, As per learned sources, reportedly FC Fazal Rehman No. 1125 of District Police Khyber while posted Addl SHO PS Landi Koral, has been involved in contacts with narcotics peddlers and smugglers. That he had provided safe passage to the narcotics smugglers in his area of jurisdiction and remained involved in contacts with them. In return, he received bribes from them. Such corrupt activities and criminal abetment come under the meaning of Misconduct.

Enquiry proceedings:

During the course of the enquiry, the delinquent was issued with Charge Sheet. He submitted his reply. Then he was called to appear before the inquiry officer. He was heard in person and his statement was recorded. Could not provide any solid evidence in his defense.

Conclusion:

- FC Fazal Rehman No. 1106 He is found guilty of the same miss-conduct.

Recommendation:

Keeping in the view of the above, it is kindly recommended that

- FC Fazal Rehman No. 1106 may kindly be awarded with suitable punishment.

Submitted please

Kamal Hussain
KAMAL HUSSAIN

Superintendent Of Police Investigation
District Khyber

JAVED GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

19

F/II

OFFICE OF THE
DISTRICT POLICE OFFICER
KHYBER
Tel: 091-5862033



No. 7 TA-DPO/Khyber

Dated: 21/10/2021

DISCIPLINARY ACTION UNDER SECTION 5(B) OF POLICE RULES
1975

I, Capt. Saleem Abbas Kulachi (PSP), District Police Officer, Khyber, as a competent authority, believe that PC Fazal Rehman No. 1106 of District Police Khyber has rendered himself liable to be proceeded against as he committed the mentioned below allegations within the meaning of Police Rules, 1975 (With Amendments - 2014).

STATEMENT OF ALLEGATIONS UNDER SECTION 6 (i) (a) OF POLICE RULES 1975

As per learned sources, reportedly PC Fazal Rehman No. 1106 of District Police Khyber while posted as Addl. SHO Landi Kowal, has been involved in contacts with narcotics peddlers and smugglers. That he had provided safe passage to the narcotics smugglers in his area of jurisdiction and remained involved in contacts with them. In return, he received bribes from them. Such corrupt activities and criminal abetment come under the meaning of Misconduct as per section 2(iii) and render him liable for punishment under section 3(b) of Khyber Pakhtunkhwa Police Rules, 1975 (With Amendments - 2014), respectively.

To probe into the above-mentioned allegations against the said accused SP Javed Iqbal is hereby nominated as the Inquiry Officer under Section 5(4) of the Khyber Pakhtunkhwa Police Rules 1975 (With Amendments - 2014).

The Inquiry Officer shall in accordance with the provision of Police Rules, 1975, provide reasonable opportunity of hearing to the delinquent official, record the findings, and make immediate recommendations whether to punish or to take other appropriate action against the delinquent official.

PC Fazal Rehman No. 1106 of District Police Khyber are directed to appear before the Inquiry Officer on the date, time and place fixed by the Inquiry Officer.

Capt. SALEEM ABBAS KULACHI (PSP)
DISTRICT POLICE OFFICER,
KHYBER

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- 2 HRMIS and Service Record Branch for record/Profile (if) update

JAVED IQBAL
Supervisor, Court of Khyber
(ASC # 531)

B-23-6271

93-8484

Handwritten signatures and scribbles at the top of the page.

Accepted by:

Main body of handwritten text, possibly a legal document or affidavit, enclosed in a rectangular border.

Handwritten notes on the right margin.

Service Tribunal, KPL, Peshawar
CCP, Peshawar & Others vs. Fazal Rehman
Service Appeal No. 13/09/2009

وکالت نامہ

Fazal Rehman (Ex-courtable)