Service Appeal No.489/2024.

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others. Respondents.

I.n d e x

S.NO	DOCUMENTS	Annexure	PAGES		
1.	Reply	:	1-3		
2.	Authority		4		
3.	Affidavit		5		
4.	Copy list	A	6		
5.	Charge Sheet	В	7		
6.	Statement of allegations	, C	8		
7.	Enquiry Report	D	9-10		
8.	Copy of Order	Е	11		
9.	CDR	F	12-15		

DSP/Legal,

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.489/2024.

Constable Azeem No. 5256 of CCP Peshawar...... Appellant.

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar...... Respondents.

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1. Knyber Pakhtakhta Sarried Tribonal

Respectfully Sheweth:-

PRELIMINARY OBJECTIONS:-

Dated 08-10-29

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

REPLY ON FACTS:-

As per report received from Capital City Police Officer, Peshawar vide his office Letter No. 2752/LB dated 27.09.2024 (Annexure-R), the factual position of the case is as under;

- Incorrect. The appellant was appointed as Constable in the respondent department. However, performance of the appellant during service is debatable as evident from his blemished service record having numerous bad entries. (Copy of list is annex as A).
- 2. Denied as incorrect and misleading. The appellant along with two other personnel while posted at Police Station East Cantt, Peshawar, was proceeded departmentally by issuing him Charge Sheet along with Statement of allegations on the charges of bribery from the brother of accused detained in Police Station lockup. Charge Sheet along with statement of allegations was issued to the appellant vide No. 286 /PA, dated 06.11.2023 on the charges of bribery from the brother of detained accused. ASP Hayat Abad was appointed as Enquiry Officer. During the course of Enquiry the appellant was provided due opportunity of self defense. However, he failed to prove his innocence. The Enquiry Officer recorded the appellant's statement and statements of eye witnesses besides examining CCTV footages. The Enquiry Officer after thorough probe into the matter, found the appellant guilty of the charges leveled against him vide finding report. (Copy of charge sheet, statement of allegations, and Enquiry report are annexed as A, B & E).
- 3. Incorrect as the appellant in para 3 of appeal admits that he submitted reply to the Charge Sheet issued to him. Furthermore, proper departmental enquiry was conducted against the appellant under Rules ibid, wherein charges leveled against him were proved beyond any shadow of doubt. Proper opportunity of personal hearing was provided to appellant by the competent authority but the appellant failed to defend himself with plausible and justifiable grounds.

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- 4. Incorrect. After meticulously observing all codal formalities and considering the facts and rules involved, the appellant was duly awarded punishment commensurate with his guilt. The appellant filed departmental appeal, which was thoroughly examined and an ample opportunity of hearing was provided to the appellant by appellate authority but the appellant failed to defend himself with plausible/justifiable grounds. Hence his appeal was rejected/filed vide No. 387-93/PA, dated 30.01.2024. (Copy of Order annexed as D).
- 5. Correct to the extent that the appellant filed Revision Petition before the Appellate Authority which was thoroughly processed and sufficient opportunity of hearing was provided to him. The Appellate Authority took a lenient view and the dismissal order was modified into Minor Punishment of forfeiture of one year approved service. Moreover, his period remained out of service was treated as leave without pay vide order No. 913-918/24, dated 07.05.2024.
- 6. Para already explained in the above para. Furthermore, the appellant filed a service appeal before this Hon'ble Service Tribunal as well as review petition before the Inspector General of Police, KPK after his departmental appeal was rejected. While the department had not received Notice of the service appeal, the Revisional Authority while its perusing revision petition Authority took a lenient view, and the dismissal order was modified into Minor Punishment of forfeiture of one year approved service. Moreover, his period remained out of service was treated as leave without pay. The appellant concealed the fact of going into Service Appeal in this Hon'ble Tribunal from the revisional authority. Rest of the para pertain to amended service appeal, needs no comments.
- 7. That the appellant has been treated in accordance with law. Therefore the instant appeal of the appellant, being devoid of merits, is liable to be dismissed on the following grounds.

REPLY ON GROUNDS:-

- A. Incorrect. Orders passed by the respondent department are in accordance with law/rules.
- B. Incorrect. The allegation against the appellant was established beyond any reasonable doubt. After completing all codal formalities during enquiry, he was awarded major punishment of dismissal from service. The appellant's revision petition was partially accepted by the competent authority as per law.
- C. Incorrect. The appellant and two other police personnel were found guilty of accepting illegal gratification and two 9mm pistols. The appellant could not prove his innocence during departmental proceedings, thus he was Awarded major punishment of dismissal from service. The appellant revision petition was partially accepted by the competent authority as per law by taking a lenient view. Their conduct breached both legal and ethical standards and seriously undermines the integrity of the police force. The gravity of his misconduct is deemed intolerable and contrary to the core values of law enforcement.
- D. Incorrect as explained above.
- E. Incorrect as explained above.
- F. Incorrect as explained above.
- G. Incorrect. During the course of enquiry, the appellant's Call Data Records (CDRs) were examined, revealing that the appellant had made several contacts with ASI Nazar Gul for the purpose of bargaining. The appellant admitted these communications, which indicate that he

was engaged in negotiations for personal gains. Such actions, as a member of a disciplined force, amount to gross misconduct. (Copy of CDR is annexed as E).

H. That the answering respondents also seek permission of this Hon'ble Tribunal to raise additional grounds at the time of arguments.

PRAYERS:-

Keeping in view the above stated facts & reasons it is, most humbly prayed that the appeal of the appellant being devoid of merits and limitation, may kindly be dismissed with costs please.

DIG/Legal,

For Provincial Police Officer, Khyber, Pakhtunkhwa, Peshawar. (Dr. Muhammad Akhtar Abbas)PSP (Respondent No.01)

Incumbent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.489/2024.

Constable Azeem No. 5256 of CCP Peshawar...... Appellant

VERSUS

Capital City Police Officer, Peshawar and others..... Respondents

AUTHORITY.

I respondents are hereby authorize <u>Mr.Inam Ullah</u> DSP legal of Capital City Police, Peshawar to attend the Hon'ble Court and submit written reply, statement and affidavit required for the defense of above service appeal on behalf of respondent department.

For Provincial Police Officer,

Khyber, Pakhtunkhwa, Peshawar.

(Dr. Muhammad Akhtar Abbas)PSP

Incumbent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 489/2024.

Constable Azeem No. 5256 of CCP Peshawar...... Appellant.

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar...... Respondents.

<u>AFFIDAVIT</u>

I, Qasim Ali Khan Capital City Police Officer, Peshawar do hereby solemnly affirm on oath that the contents of accompanying Para-wise Comments are correct to the best of my knowledge and belief. Nothing has been concealed from this Hon'ble Tribunal.

It is further stated on oath that in this Service Appeal, the answering respondent has neither been placed ex-parte nor his defense is struck off.

Capital City Partice Officer,

(QASIM ALI KHAN) PSP Incumbent

Countersigned By-

DIG/ Legal, CP&

For Inspector General of Police, Khyber Pakhtuakhwa, Peshawar

(Respondent No. 1)

(DR. MUHAMMAD AKHTAR ABBAS) PSP

Incumbent

IN B OCT. WAS

- Assertant

Azeem Khan NO.5256 S/O Amin Khan Name of Official Tetara Tarojaba PS Akbar Pura Distt: Nowshera R/O Date of Birth 10.02.1986 2. 01.01.2010 Date of enlistment 3. 10th Education 4. Courses Passed Recruit 5. 14 years 0 months & 0 days Total qualifying service 6. NIL **Good Entries** 7. Bad Entries (L.W.O Pay, E/Drill & Warning) 01. 02 days leave without pay vide OB No.511 dt: 05.07.2010 02. 01 days leave without pay vide OB No.546 dt: 19.07.2010

08. Minor Punishment

Nil

09. Major Punishment

Nil

10. Punishment (Current)

Awarded major punishment Removal from service by SSP (Operation) Peshawar vide order No.2106-11/PA, dated 15.12.2023 with immediate effect.

Total leave at his credit	Availed leaves	Balance
672	Nil	672

CRC

PΑ

W/CCPO

Oz Attosted

CHARGE SHEET

- 1. Whereas I am satisfied that a formal enquiry as contemplated by Efficiency & Disciplinary 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 Rule 3 of the aforesaid Rules.
- Now therefore, as required by Rule 6 (1) of the said Rules, I, Lt Cdr ® Kashif Aftab Ahmad Abbasi, PSP,SSP Operations, Peshawar hereby charge you the following police officials under Efficiency & Disciplinary Rule 1975 on the allegations mentioned in the enclosed Summery. Allegations.
 - i. ASI Nazar Gul Khan PS East Cantt
 - ii. Constable Azeem No. 5256 PS East Cantt
 - iii. Constable-Noor ul Basar No. 6070
- 4. And I hereby direct you further under the said Rule to put forth written defence within 7 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 specific period, it shall be presumed that you have no defense to offer and ex-parte action will be taken against you.

6. Statement of Allegation is enclosed.

(Lt Cdr ® KASHIF AFTAB AHMAD ABBASI)PSP

Senior Superintendent of Police (Operations) Peshawar

No 286 /PA dated Peshawar the 06 /1/ /2023

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

Oz. Attested

SUMMARY OF ALLEGATIONS

- 1. I, Lt Cdr ® Kashif Aftab Ahmad Abbasi, PSP,SSP Operations Peshawar as competent authority, am of the opinion that the following police officials have rendered themselves liable to be proceeded against departmentally as they have committed the following acts/omission within the meaning of the Khyber Pakhtunkhwa (E&D) Rules, 1975.
 - i. ASI Nazar Gul Khan PS East Cantt
 - ii. Constable Azeem No. 5256 PS East Cantt
 - iii. Constable Noor ul Basar No. 6070

STATEMENT OF ALLEGATIONS

- A preliminary enquiry conducted by SDPO Cantt vide his office memo No. 2467/PA dated 01.11.2023 that in light of the directions the accused namely Yasir Khan s/o Shakeel Khan r/o Masho Khel Badaber, Peshawar was rearrested by the surveillance team and was confined at Police Station East Cantt.
- It has been learnt through reliable sources that during the confinement period ASI Nazar Gul Khan and Constable Azeem No. 5256 contacted the brother of the accused Yasir and demanded 01 lac Rupees and 02 9-MM Pistols of which after mutual bargaining the brother confined accused handed over two 9MM (local made) pistols to ASI Nazar Gul Khan and Constable Azeem
- Being a part of disciplinary force their this act is highly objectionable and renders them liable for disciplinary proceedings under (E&D) Rules, 1975.

2.	For the purpose of scrutinizing th	e conduct	of afore	said police	official i	n the said	episode with
referen	For the purpose of scrutinizing the cc to the above allegations	ASY	Na	tab		is appointe	d as Enquiry
Officer	under Efficiency & Disciplinary R	Rule 1975.		,		• •	· · · · · · · · · · · · · · · · · · ·

3. The Enquiry Officer shall in-accordance with the provision of the Efficiency & Disciplinary Rules 1975, provide reasonable opportunity of learning to the accused Official and make recommendations as to punish or other action to be taken against the accused official.

(Lt Cdr ® KASHIF AFTAB AHMAD ABBASI)PSP

Scnior Superintendent of Police Operations) Peshawar

> Oz. Attested



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



FINDING REPORT U/R 6 (5) OF POLICE RULES 1975, AGAINST ASI NAZAR GUL KHAN, FC AZEEM No. 5256 & FC NOOR UL BASAR No. 6070 OF PS EAST CANTT.

Please refer to your office Endt: No. 286/E/PA, dated 06.11.2023; pertaining to departmental enquiry against the following officials:-

- **01.** ASI Nazar Gul Khan PS East Cantt:
- 02. Constable Azcem No. 5256 PS East Canti:
- **03.** Constable Noor Ul Basar No. 6070

STATEMENT OF ALLEGATION:

As per preliminary enquiry carried out by DSP Cantt: Circle Peshawar vide his office Memo: No. 2467/PA, dated 01.11.2023 into allegations that during the confined period of accused Yasir at PS East Cantt:, ASI Nazar Gul Khan, FC Azeem No.5256 and FC Noor Ul Basar No. 6070 contacted the brother of accused and demanded 01 Lack Rupees and 02x 9-MM Pistols, in which after mutual bargaining, brother of accused handed over two 9-MM Pistols to ASI Nazar Gul and FC Azeem.

Their above act speaks volume of misuse of the official powers in the discharge of duties and render them liable for disciplinary proceedings under Police (Efficiency & Disciplinary) rules, 1975.

PROCEEDINGS:

- 1. The alleged officials were summoned to the office of the undersigned.
- Records and evidence related to the case were examined during the meeting.
- 3. Personal hearings were conducted for each alleged official, both individually and collectively, to gather information and uncover the facts.
- Additionally, the brother and father of the accused Yasir from the accused party were personally heard and their statements were recorded. They stated that they had received the price/amount for the pistols.

FINDINGS:

Having gone through relevant record, evidence of video recordings/CCTV footage, statement of the alleged Police officials, statements of the eye witnesses, followed by cross examination following are the findings of the matter:-

- 1. ASI Nazar Gut Khan denies asking for any illegal gratification or involvement in any awrongdoing related to the family members of accused. (Written statement attached)
- 2. FC Azeem denies meeting the accused Yasir, refutes the allegations against him, and claims that his earlier statement to the DSP Cantt was recorded under pressure. (Written statement attached).
- 3. FC Noor-Ul-Basar denies any illegal or corrupt intentions, stating that he merely informed the family of accused and was unaware of the consequences of such phone calls. He also mentions not being briefed about the sensitivity of lock-up duty. (Written statement attached).
- 4. Video footage was examined, showing that police efficials visited an Arms Company in civilian clothing, but no illegal exchange or transaction was observed. (USB attached)
- The accused party admits in their written statements that they received the price of pistols and do not wish to pursue further action on their complaints. (Written statements attached).

6. After a thorough examination of records, call detail records (CDRs), video footage, and written statements, it is concluded that due to the negligence of the alleged officials, secrecy was compromised. And it is also established that Azeem has received pistols from accused Yasir. Moreover, information about the presence of a key accused was disclosed to his family. Although there is no evidence of money being asked, however the negligence of the officials has been established.

CONCLUSION:

In the light of above circumstances, the allegations leveled against delinquent officials have been proved and they stand guilty of the charges, hence the undersigned agree with the preliminary enquiry.

RECOMMENDATIONS:

In view of above, the undersigned being Enquiry Officer, recommend the delinquent officials for major punishment of Time Scale for period mentioned against their names:

ASI Nazar Gul Khan

01 year

FC Noor Ul Basar No. 6070

01 year

FC Azeem No. 5256

02 years

All relevant documents are enclosed herewith.

NAYAB KAMZAN (PSP) Assist: Superintendent of Police, Hayatabad: Sub-Division, Peshawar.

Worthy Senior Superintendent of Police, Operations Peshawar,

43 /E/St, dated Peshawar the 23 / 1/ /2023.



OFFICE OF THE CAPITAL CITY POLICE OFFICER, PESHAWAR

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

ORDER.

This order will dispose of the departmental appeal preferred by Ex-Constable Azeem Khan No. 5256, who was awarded the major punishment of "dismissal from service" under KP PR-1975 (amended 2014) by SSP/Operations, Peshawar vide order No. 2106-11/PA, dated 15.12.2023.

- Brief facts leading to the instant appeal are that the defaulter Constable was proceeded against departmentally on the charges that in light of the directions, the accused namely Yasir Khan s/o Shakeel r/c Masho Khel Badaber, Peshawar was arrested by the surveillance team and was confined at PS East Cantt: till further orders. During the confinement period, the defaulter Constable contacted brother of the accused namely Yasir and demanded 01 Lac Rupees and two 09-MM (Local made) Pistols. After mutual bargaining, brother of the accused i.e. Yasir, handed over two 09-MM (Local made) Pistols to ASI Nazar Gul and Constable Azeem.
- He was issued Charge Sheet and Summary of Allegations by SSP/Operations, Peshawar. ASP/Hayatabad, Peshawar was appointed as Enquiry Officer to scrutinize the conduct of the accused official. The Enquiry Officer after conducting departmental enquiry submitted his findings in which 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.
- 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 SSP/Operations, Peshawar vide order No. 2106-14/PA, dated 15.12.2023, is hereby rejected/filed.

"Order is aunounced"

CAPITAL CITY POLICE OFFICER, PESHAWAR

No. 1081-88 /PA/CCP, dated Peshawar the

15/ 03/2024

Copies for information and necessary action to the:-

- 1. SSP/Operations Peshawar.
- 2. SP/HQrs:, Peshawar.
- AD/IT CCP Peshawar.
- 4. EC-II, AS & Pay Officer.
- 5. FMC along with complete Fouji Missal.

Or Attested

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, OUTGOIN	IG 9233224021275		2023-10-23 16:45:05.0	82	358514082156220	N/A - PESHAWAR
INCOMIN	G 923322402127	923025873867	2023-10-23 16:47:24.0	178	358514082156220	N/A - PESHAWAR
	G 923322402127	923118844560	2023-10-23 17:41:28.0	45	358514082156220	N/A - PESHAWAR
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	G 923322402127	923369078541	2023-10-23 18:16:18.0		358514082156220	N/A - PESHAWAR
OUTGOIN	G 9283224021275	9234255585567	2023-10-23 18:36:42.0		358514082156220	N/A - PESHAWAR
OUTGOIN	G 923322402127	923339356291	2023-10-23 18:50:29.0		358514082156220	N/A - PESHAWAR
	G 923322402127	923339356291	2023-10-23 18:51:43.0			N/A - PESHAWAR
OUTGOIN	G 92832240212 <i>72</i> 5	9233389978564	2023-10-23 18:52:58.0			N/A - PESHAWAR
OUTGOIN	G 92332240242747		2023-10-23 18:55:48.0		358514082156220	N/A - PESHAWAR
OUTGOIN	G 923322402127	923139420875	2023-10-23 19:32:48.0			N/A - PESHAWAR
OUTGOIN	5 923322402127	923341521402	2023-10-23 19:34:15.0			N/A - PESHAWAR
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	923322402127	923341521402	2023-10-23 20:48:09.0			Jahangirpura Bazar Pipal Mandi PSH - PESHAWAR
OUTGOING	923322402127	923369078541	2023-10-23 21:16:17.0	140		N/A - PESHAWAR
		923369078541	2023-10-23 22:02:05.0			N/A - PESHAWAR
	923322402127	923369078541	2023-10-23 22:51:22.0			Kush Mugam - KUSH MUQAM
OUTGOING	e 928322102127ee	9231255585357	2023-10-24 07:17:53.0			Kush Muqam - KUSH MUQAM
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	923322402127		2023-10-24 08:32:48.0			Wapda town Park - TARU JABBA
		923359307831	2023-10-24 08:34:20.0			Baloo - NOWSHERA
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ίS	OUTGOING	923322402127	923139420875	2023-10-23 18:08:35.0	72	358514082156220	N/A - PESHAWAR	
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