

**BEFORE THE SERVICES TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 1566/2024

Imtiaz Khan (SI) No.H/122 presently posted as SHO Thana  
Lora District Abbottabad

...Appellant

Versus

1. Regional Police Office Hazara Abbottabad.
2. District Police Officer Haripur

...Respondents

**SERVICE APPEAL**

**INDEX**

S.#	Description	Page no	Annexure
1	Service Appeal	1-6	
2	Affidavit	7	
3	Copy of Impugned Order dated 16-04-2024	8	"A"
4	Copy of the Letters	9-15	"B to E"
5	Copy of F I R dated 16-04-2024	16	"F"
6	Copy of Advisory Letters	17	"G"
7	Copy of F I Rs	18-19	"H"
8	Copy of Departmental Appeal	20-24	"I"
9	Copy of Impugned Order dated 22-08-2024	25	"J"
10	Copy of Wakalatnama	26	"K"

APPELLANT

Through,

Dated 20-09-2024

(Abdul Aziz Tanoli)

Advocate High Court

(1)

**BEFORE THE SERVICES TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 1566 / 2024

Imtiaz Khan (SI) No.H/122 Presently Posted as SHO  
Thana Lora District Abbottabad.

.....Appellant

**Versus**

1. Regional Police Office Hazara Abbottabad.
2. District Police Officer Haripur.

.....Respondents

PRAYER: ON ACCEPTANCE OF THE INSTANT  
SERVICE APPEAL, AGAINST THE IMPUGNED  
ORDER DATED 16/04/2024 PASSED BY  
RESPONDENT NO. 2 WHEREBY THE APPLICANT  
WAS AWARDED PUNISHMENT OF FORFEITURE  
OF TWO YEARS APPROVED SERVICE; AGAINST  
WHICH THE IMPUGNED ORDER DATED  
22/08/2024 WAS PASSED BY RESPONDENT NO.1  
IN DEPARTMENTAL APPEAL OF THE APPELLANT  
WHEREBY THE APPEAL OF THE APPELLANT  
WAS REJECTED. BOTH THE IMPUGNED ORDERS  
MAY GRACIOUSLY BE SET ASIDE AND MAY BE  
DECLARED ILLEGAL, UNLAWFUL, WITHOUT  
LAWFUL AUTHORITY, AGAINST THE LAW, RULES  
AND SETTLED PRINCIPLES; FURTHERMORE  
THE CONSEQUENTIAL SERVICE BACK BENEFITS  
OF APPELLANT MAY ALSO BE AWARDED TO  
APPELLANT. ANY OTHER RELIEF WHICH THIS  
HON'BLE TRIBUNAL MAY DEEM FIT AND  
APPROPRIATE MAY ALSO BE GRANTED.

---

(2)

Respectfully Sheweth,

The Appellant very humbly submits as under:

1. That the Appellant has rendered more than 16 year service in the police department and is presently posted as SHO Police Station Saddar (Haripur). Appellant always performed his duties with devotion, dedication and honesty to the entire satisfaction of his superiors and never provided them a chance of reprimand.
2. That without conducting any departmental inquiry or issuing a charge sheet or providing a copy of inquiry report, if any, and without serving a show cause notice the District Police Officer Haripur vide this letter OB No. 275 dated 16-04-2024 has awarded the Appellant punishment of "Forfeiture of (02) two years approved service" and that too without taking into consideration the stance and the reasons advanced by the Appellant. ***(Copy of Impugned Order dated 16-04-2024 is attached as annexure "A")***
3. That the allegations as incorporated in the punishment order are incorrect, baseless and Malafide against the facts and proof.
4. That Appellant remained posted as SHO Police Station Hattar (Haripur District) for a period of only three (3) months. During his period he carried out his duties efficiently, effectively and honestly. He left no stone unturned in discharge of his official duties.

(3)

5. That it is incorrect and baseless that Appellant has ever been non-serious towards his official duties like security arrangements of two Korean Engineers working in Volta Batteries Factory Hattar (Haripur).
6. That Appellant made all enthusiastic efforts to take every step for better security arrangement of these Korean Engineers. They are permanent employees of Volta Factory Hattar since 2011. There had been many SHOs posted in P.S. Hattar in the past in 12/13 years. However so far, as appellant's responsibility is concerned, Appellant during his position as SHO P.S. Hattar frequently visited and discussed the security matter with the management of Volta Factory and issued necessary advisory instructions about security measures. Even Appellant issued written advisory letters dated 01-02-2024 and 04-04-2024 with copies to DSP (CIRCLE) Khanpur and Reader to DPO Haripur where upon the Factory Administration wrote a reply letter dated 04-04-2024 addressing the same to DPO Haripur with copy to DSP (CIRCLE) Khanpur as well. Not only that, the Appellant even got registered an FIR dated 18-04-2024 against the admin manager of Volta Factory Hattar in this respect ***(Copy of correspondence is attached as annexures B to E whereas Copy of FIR is attached as annexure "F")***.
7. That not to speak of Volta Factory Hattar even the Appellant was well aware of his duties and responsibilities being posted as SHO P.S. Hattar, He visited almost all the factories situated in Hattar Industrial Estate Haripur and minutely checked there all kinds of security arrangement and issued them Advisory

(4)

Letters strictly instructing them to improve their security in all respects as was necessary. Even FIRs dated 17-04-2024 and 18-04-2024 were registered against them. ***(Copies of Advisory Letters and FIRs dated 17-04-2024 and 18-04-2024 are attached as annexure "G & H").***

8. That instead of taking into consideration the Appellant's above mention efforts and appreciating and encouraging, the DPO Haripur has tried to penalize and discourage his subordinate officer, Appellant, by awarding punishment of forfeiture of two years approved service which resulted into tremendous loss to Appellant in his service career.

9. That the Appellant file the departmental Appeal before Worthy Regional Police Officer Hazara Abbottabad on 13-05-2024. ***(Copy of Appeal is attached as Annexure "I").***

10. That the Respondent No. 1 without adopting proper procedure as laid down by law passed the impugned order dated 22-08-2024 rejecting the Appeal of the Appellant on 22-08-2024. ***(Copies of Impugned order is attached as Annexure "I")***

11. That feeling aggrieved from both the orders the instant service appeal is being filed before this Hon'ble Tribunal inter alia and amongst any other on the following grounds.

**GROUND:**

1. That the impugned orders passed by the Respondents dated 16-04-2024 and 22-08-2024

5

being illegal, unlawful, against the law, arbitrary, fanciful, excess of jurisdiction are liable to be set aside.

2. That the impugned orders passed by Respondents were not passed under the law, police rule, no show cause notice was issued to Appellant, no charge sheet and statement of allegation was issued to appellant. Hence the orders passed by the Respondents being illegal, unlawful are liable to be set aside.

3. That no inquiry what so ever was conducted against the Appellant and similarly neither any inquiry officer was appointed nor the so called allegations were proved against the Appellant, despite these glaring irregularities, the Appellant was awarded punishment for forfeiture of two years approved service. Hence the impugned orders are liable to be set aside furthermore the stance and reason advanced by the Appellant in his departmental Appeal was also not considered thus rejected by the appellate authority without recording justified reasons. Hence both the impugned orders are liable to be set aside.

4. That both the impugned orders are passed on personal grudge which amounts to victimization therefore are not sustainable in the eyes of law and liable to be set aside.

5. That no chance of personal hearing was given to the Appellant and there is nothing on record against the appellant. It is proved that the Appellant was not engage in gross misconduct under the KPK

(6)

Efficiency and Disciplinary Rules (E&D) 1975  
(Amended 2014), Hence both the impugned orders  
are liable to be set aside.


6. That the Service Appeal is well within time.

PRAYER: ON ACCEPTANCE OF THE INSTANT  
SERVICE APPEAL, AGAINST THE IMPUGNED  
ORDER DATED 16/04/2024 PASSED BY  
RESPONDENT NO. 2 WHEREBY THE APPLICANT  
WAS AWARDED PUNISHMENT OF FORFEITURE  
OF TWO YEARS APPROVED SERVICE, AGAINST  
WHICH THE IMPUGNED ORDER DATED  
22/08/2024 WAS PASSED BY RESPONDENT NO. 1  
IN DEPARTMENTAL APPEAL OF THE APPELLANT  
WHEREBY THE APPEAL OF THE APPELLANT  
WAS REJECTED. BOTH THE IMPUGNED ORDERS  
MAY GRACIOUSLY BE SET ASIDE AND MAY BE  
DECLARED ILLEGAL, UNLAWFUL, WITHOUT  
LAWFUL AUTHORITY, AGAINST THE LAW, RULES  
AND SETTLED PRINCIPLES; FURTHERMORE  
THE CONSEQUENTIAL SERVICE BACK BENEFITS  
OF APPELLANT MAY ALSO BE AWARDED TO  
APPELLANT. ANY OTHER RELIEF WHICH THIS  
HON'BLE TRIBUNAL MAY DEEM FIT AND  
APPROPRIATE MAY ALSO BE GRANTED.

Dated 20-09-2024

Appellant

Through:

  
(Abdul Aziz Tanoli)  
Advocates High Court  
Abbottabad

VERIFICATION:

Verified on oath that the contents of foregoing Service Appeal are  
true and correct to the best of my knowledge and belief and nothing  
has been mis-stated or concealed from this Honourable Tribunal.

Dated 20-09-2024



  
APPELLANT

LF

**BEFORE THE SERVICES TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_ / 2024

Imtiaz Khan (SI) No.H/122 Presently Posted as SHO Thana Lora District Abbottabad

...Appellant

**Versus**

1. Regional Police Office Hazara Abbottabad.
2. District Police Officer Haripur

...Respondents

**SERVICE APPEAL**

**AFFIDAVIT**

I Imtiaz Khan (SI) No.H/122 Presently Posted as SHO Thana Lora District Abbottabad (Appellant), do hereby affirm and declare that the contents of instant Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.

Dated 20-09-2024



*Imtiaz Khan*  
DEPONENT





Ammed (A)

**DISTRICT POLICE OFFICER  
HARIPUR**

☎ 0995-920100/01, 📠 -0995614714, ✉: [dpoharipur1@gmail.com](mailto:dpoharipur1@gmail.com)

**ORDER**

SI Imtiaz Khan No.H/122, while posted as SHO PS Hattar, it has come to the notice of the undersigned through reliable information report that 02 Korean engineers are working in Volta Batteries, Hattar. They proceed to Islamabad from work site on daily basis in an ordinary motorcar, which is clear violation of SOP of MoI and written instructions/directions conveyed to him time and again by the undersigned.

In this regard he has been directed to avoid movement of Chinese/Foreigners without bullet/bomb proof vehicle, but he did not bother to comply the SOPs and written/verbal instructions of the undersigned. His non-serious attitude may lead towards any untoward incident. This tantamounts to gross misconduct on his part in terms of the KPK Police Efficiency & Disciplinary Rules of 1975 (amended 2014)".

Therefore, I, Suleman Zaffar (PSP), District Police Officer Haripur, being competent authority under the Khyber Pakhtunkhwa Police Efficiency & Disciplinary Rules 1975 (amended 2014), hereby decides to dealt the delinquent officer in the Police Summary Proceedings as the act of the omission on the part of accused officer is liable for punishment. Hence, he was called in the OR and heard in person but he could not give any plausible justification in his defense. I, am fully satisfied that SI Imtiaz Khan No.H/122 has committed misconduct. Therefore, he is awarded minor punishment of "Forfeiture of Two Years Approved Service" with immediate effect."

OB No. 275

Dated 16-04-24



Suleman Zaffar, (PSP)  
District Police Officer,  
Haripur

Attested.

S.P./Headquarters

(9)

Annex (B)

- 6 -

تھانہ حطار

ضلع ہری

نوٹس نسبت سیکورٹی فارنز

تھانہ حطار

از دفتر افسر مہتمم تھانہ حطار

پور

نوٹس بنام جنرل میجر دولٹا انڈسٹری حطار

3/2/24

آپ کو بذریعہ نوٹس ہذا مطلع کیا جاتا ہے کہ آپ کے پاس فارنز جن میں تین چائینیز اور دو کورین کام کر رہے ہیں کورین روزانہ اسلام آباد سے آتے اور جاتے ہیں جن کی نسبت آپ نے مقامی تھانہ کو کسی قسم کی آمد جامد کی نسبت اطلاع نہیں دی اس کے علاوہ آپ کے پاس فارنز کی سیکورٹی کے لیے بولٹ پروف گاڑی بھی نہ ہے جس کی وجہ سے چائینیز اور دیگر فارنز کی آمد جامد میں کسی قسم کا بھی کوئی ناخوشگوار واقعہ رونما ہو سکتا ہے

آپ کو بذریعہ ایڈوائزری نوٹس مطلع کیا جاتا ہے کہ آپ فارنز کی آمد اور جامد کی نسبت بروقت مقامی

تھانہ کے فون نمبر 0995617388 پر اطلاع کریں گے ورنہ کسی بھی ناخوشگوار واقعہ کی صورت میں آپ کے خلاف قانون کے

مطابق کارروائی عمل میں لائی جائے گی اور آپ فارنز کی سیکورٹی کے لیے بھی بولٹ پروف گاڑی کا بندوبست کر کے اندر چھ بوم تحریر

رپورٹ دیں ضروری ہے



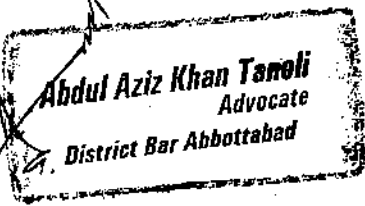
SHORAHATTAR

01.02.2024

کاپی برائے اطلاع

جناب DSP صاحب سرکل خانپور

Attested

  
Abdul Aziz Khan Tanoli  
Advocate  
District Bar Abbottabad

(10)

Annex C

-7-

ضلع ہری پور

تھانہ حطار

اڈوٹر - افسر مہتمم تھانہ حطار

نوٹس نام - شاہد نذیر صاحب

نیجر پاکستان اکاؤنٹنٹس لیمیٹڈ حطار

عنوان - ایڈوائسری نوٹس (سیکورٹی آف فارمز)

نمبر - 113-SA مورخہ - 04 جولائی 2024/ H/R

یادداشت:-

مشاہدہ میں یہ بات آئی ہے کہ آپ کی <sup>ذمہ داری</sup> اڈوٹورین انجینئرنگ کام کر رہے ہیں۔ جو روزانہ کی بنیاد پر ٹیکسٹری میں کام کے سلسلہ میں اسلام آباد سے آتے جاتے ہیں۔ آمدورفت کے لیے بلٹ پروف گاڑی نہ ہے۔ نیز حالیہ سانحہ بٹام کے بعد موجودہ حالات کے پیش نظر برعلاقہ 10/11 جاریہ افسران بلا کسی بھی فارمز کی نقل و حرکت کے لیے بلٹ پروف گاڑی کا استعمال ضروری قرار دیا گیا ہے۔ لہذا

آپ کو بذریعہ نوٹس ہذا ہدایت کی جاتی ہے کہ آپ متذکرہ بالا کو رین انجینئرنگ کی نقل و حرکت کے لیے فوری طور پر بلٹ پروف گاڑی کا بندوبست کریں بصورت دیگر کسی بھی ناخوشگوار واقعہ کے رونما ہونے کی صورت میں آپ کو ذمہ دار ٹھہرایا جا کر آپ کے خلاف سخت قانون کاروائی عمل میں لائی جائے گی۔

*(Signature)*

حطار، ہری پور

**Abdul Aziz Khan Tanoli**  
Advocate  
District Bar Abbottabad

کاپی برائے اطلاع :-

1- جناب DSP صاحب سرکل خانیپور

2- ریڈر جناب (DPO) صاحب ہری پور

*Attested*

ازد تفر۔ افسر مہتمم قلم حطار

نولس نام۔ شہریار صدیقی

ایڈمن سبجر XIN کا پراسنر، بمیرہ روڈ حطار۔

عنوان:- ایڈوائزر نولس (سیکورٹی آف کارنر)

Annex 'D'

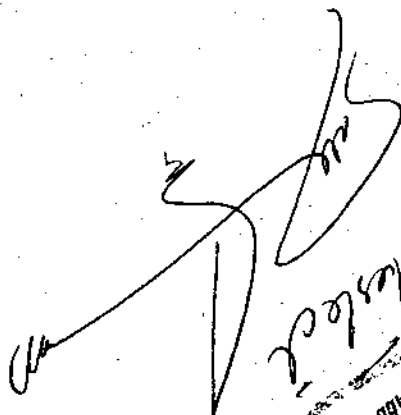
مورہ:- 183-522  
2024/4/17  
PS-522  
یادداشت:-

امر ذ آپ کی زیر قبیر قبیلری کا سیکورٹی آڈٹ کیا گیا جس میں چار چائینیز کام کے لیے اکثر اوقات آتے رہتے ہیں۔ ان چائینیز کی ہوم ڈیپارٹمنٹ خیر پختہ خواہ سے کوئی NOC برسوقہ پیش نہ کی گئی ہے۔ سیکورٹی کے انتظامات انتہائی ناقص پائے گئے۔ سیکورٹی میں ذیل نقائص پائے گئے ہیں۔

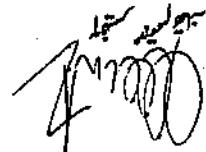
- 1۔ باڈنری وال مکمل نہ ہے۔
- 2۔ باڈنری وال پر خار دار تاریں نصب نہ ہیں۔
- 3۔ باڈنری وال پر وایج ٹاور موجود نہ ہیں۔
- 4۔ باڈنری وال پر سرچ لائٹس کی تعداد کم ہے۔
- 5۔ مین گیٹ پر آنے جانے والوں کی تلاشی اور جسٹیشن کا مناسب انتظام نہ ہے۔
- 6۔ پورے زیر قبیر احاطہ میں ایک بھی CCTV کیمرہ موجود نہ ہے۔
- 7۔ CCTV کیمروں کی ریکارڈنگ کا سسٹم موجود نہ ہے۔
- 8۔ آگ بجھانے کے آلات موجود نہ ہیں۔
- 9۔ سیکورٹی اہلکاروں کی تعداد انتہائی کم ہے۔
- 10۔ تعینات شدہ سیکورٹی اہلکاروں کے پاس کسی قسم کا اسلحہ موجود نہ ہے۔
- 11۔ دوران کام چائینیز انجینیر کے ساتھ سیکورٹی اہلکار کی تعداد کم ہے۔
- 12۔ چائینیز انجینیر کی نقل و حرکت کے لیے بلٹ پروف گاڑی موجود نہ ہے۔
- 13۔ دوران نقل و حرکت چائینیز کے ساتھ سیکورٹی اہلکار ہر اہ موجود نہیں ہوتے۔
- 14۔ زیر قبیر احاطہ میں کام کرنے والے لوگوں کو سیکورٹی کے پیش نظر سیکورٹی کارڈز جاری نہیں کئے گئے۔
- 15۔ سیکورٹی کے لیے SSU پولیس نفری موجود نہ ہے۔
- 16۔ لاکر جنسی کی صورت میں کوئی EVACUATION پلان موجود نہ ہے۔

Abdul Aziz Khan Tanoli  
Advocate  
District Bar: Abbottabad

*(Handwritten signature)*

  
**Abdul Aziz Khan Tanoli**  
 Advocate  
 District Bar Abbottabad  
 Attock

طابقاً ہے

  
 ایف جی ایف

: طابقاً ہے  
 1. ڈسٹرکٹ بار ایبٹ آباد  
 2. ڈسٹرکٹ بار ڈی پو

ممبرانہ کے لئے ہے۔ اس کے ساتھ ساتھ اس کے لئے ایک اور ممبرانہ بھی ہے۔  
 اس کے لئے ایک اور ممبرانہ بھی ہے۔ اس کے لئے ایک اور ممبرانہ بھی ہے۔  
 اس کے لئے ایک اور ممبرانہ بھی ہے۔ اس کے لئے ایک اور ممبرانہ بھی ہے۔

(19)

17 - ممبرانہ کے لئے ہے۔ اس کے لئے ایک اور ممبرانہ بھی ہے۔

Abdul Aziz Khan Tanoli  
Advocate  
District Bar Abbottabad

ڈسٹرکٹ بار ایبٹ آباد

Handwritten signature

میں نے ذیل کی چیزیں اپنے پاس رکھنے کے لیے پیش کی ہیں۔

1. - ایک کاپی
2. - ایک کاپی
3. - ایک کاپی
4. - ایک کاپی
5. - ایک کاپی
6. - ایک کاپی
7. - ایک کاپی
8. - ایک کاپی
9. - ایک کاپی
10. - ایک کاپی
11. - ایک کاپی
12. - ایک کاپی
13. - ایک کاپی
14. - ایک کاپی
15. - ایک کاپی

میں نے اس کے ساتھ ساتھ ایک کاپی بھی پیش کی ہے۔

2024/02/13 - 47 SA - PS-HTR

ڈسٹرکٹ بار ایبٹ آباد

ڈسٹرکٹ بار

ڈسٹرکٹ بار ایبٹ آباد

April 23, 2024

HR/OL-04-24/144G

(19)

To  
District Police Officer - Haripur.  
Tensil & District: Haripur (KPK)

Subject: Additional Security Measures Adopted for Korean Engineers in PAL as per Advisory.

Respected Sir,

Reference subject, as per the advisories issued and keeping in view the prevailing law & order situation in the country and in the light of the discussions with concerned security authorities, we would like to update you that following additional security measures have been taken for two Korean Engineers (details attached) working in our company:

1. The residence of both Korean Engineers have been shifted from .B. - 17 (Islamabad) with immediate effect and both Korean Engineers will stay inside the Factory premises which will be properly guarded by our own security guards as well as special deployment of APC Vehicle inside Factory by Police Department (Haripur) & SSU along with armed security personnel of police.
2. It has been ensured that, till the betterment of prevailing law & order situation /compliance of security SOP's, any sort of travelling/movement of Korean Engineers outside Factory premises will only be performed under given SOP's.

The above steps are taken in addition to the already adopted security measures which are mentioned in our Letter No. HRCS/OL-04-24/0189; dated: 17-04-2024 (copy attached).

Your good self is requested to please arrange a visit of our Factory premises and examine yourself the security of Korean Engineers inside Factory premises and related security measures.

Further, it is humbly requested to please issue orders to withdraw the FIR No. 0138, Police Station, Hatlar, Dated: 16-04-2024; due to unavailability of bullet proof vehicle for the travelling of Korean engineers.

Best Regards,

Shahid Nazir  
Senior Manager Corporate Services

cc - DSP KANPUR.

cc - SHO P.S. HATTAR.

Attested

Abdul Aziz Khan Tanoli  
Advocate  
District Bar Abbottabad

OSAMA

To,

District police Officer - Haripur,

Tehsil & District: Haripur (KPK)

Subject: Additional Security Measures Adopted for Korean Engineers in PAL as per Advisory.

Respected Sir,

Reference subject, as per the advisories issued and keeping in view prevailing law 7 order situated in the country in the light of discussions with concerned security authorities, we would like to update you that following additional security measures have been taken for two Korean engineers (detail attached) working in our company:

- 1- The residence of both Korean engineers have been shifted from B-17 (Islamabad) with immediate effect and both Korean engineers will stay inside the factory premises which will be properly guarded by our own security guards as well as special deployment of APC Vehicle inside Factory by Police Department (Haripur) and SSU along with armed security personnel.
- 2- It has been ensured that till the betterment of prevailing law and order situations /compliance of security SOP's, any sort of travelling/movement of Korean Engineers outside factory premises will only be performed under given SOP's.

The above steps are taken in addition to the already adopted security measures which are mentioned in our letter No.HRCS/OL-04-24/0189; dated: 17-04-2024 (Copy attached).

Your good self is requested to please arrange a visit of our factory premises and examine yourself the security of Korean engineers inside factory premises and related security measures.

Further, it is humbly requested to please issue orders to withdraw the FIR No. 0138, Police Station Hattar, dated: 16-04-2024; due to unavailability of bullet proof vehicle for travelling of Korean Engineers.

Best Regards,

Shahid Nazir

Senior Manager Corporate Services





ضلع ہری پور

SA-154

+ 2 -

UT

تھانہ حطار

ازدختر

افسر مقیم تھانہ حطار

نوش نام

عبدالملک صاحب

Annex G

ایڈمن سٹریجی ACM پرائیویٹ لیڈنگ حطار

ایڈوانٹری نوٹس (سیکورٹی آف کارٹرز)

عنوان:-

مورخہ:- 2024/25 APR

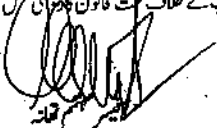
نمبر:-

یادداشت:-

امروز آپ کی ٹیکٹری (ACM High Tech) واقع باڈی روڈ حطار جس میں 01 چائینیز انجینئر کام کر رہا ہے جس کا سیکورٹی آڈٹ کیا گیا جو سیکورٹی کے انتظامات میں ذیل تفصیلات پائے گئے ہیں۔

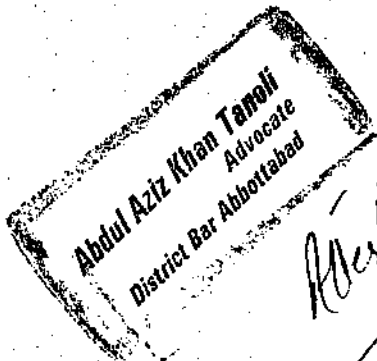
- 1 - عقیقہ باڈی روڈ وال کی اونچائی کم ہے۔
- 2 - عقیقہ باڈی روڈ وال پر فینس اور خار دار تاریں عمل نصب نہیں۔ تعیب کا کام تیز کرتے ہوئے فوری پایا تکمیل تک پہنچائیں۔
- 3 - عقیقہ باڈی روڈ وال سے باہر کی ریکارڈنگ کے لیے کوئی CCTV کیمرہ موجود نہ ہے۔ نصب کیے جائیں۔
- 4 - چائینیز انجینئر کی ٹیکٹری سے باہر کسی بھی قسم کی نقل و حرکت سے قبل صفائی کو مطلع کیا جائے نیز نقل و حرکت کے لیے پلٹ پر دف گزارے کا استعمال بھی بنایا جائے۔
- 5 - SOS سسٹم موجود ہے۔
- 6 - لکڑی والی الارم سسٹم موجود ہے۔ فوری نصب کیا جائے۔

موجودہ سیکورٹی کے حالات کے پیش نظر مندرجہ بالا چیدہ چیدہ اقدامات اٹھانے کی از حد ضرورت ہے لہذا آپ کو بذریعہ نوٹس ہذا ہدایت کی جاتی ہے کہ آپ مندرجہ بالا اقدامات کو عملی جامہ پہنا کر زیر دستخطی کو جواباً مطلع کریں بصورت دیگر آپ کے خلاف سخت قانون کارروائی عمل میں لائی جائے گی۔

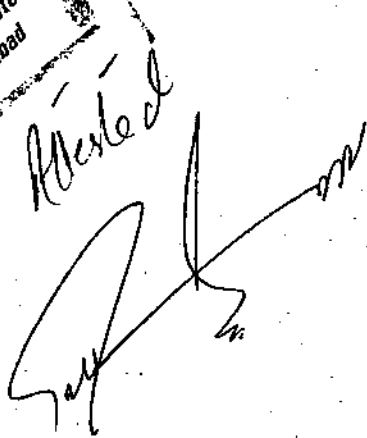


حطار، ہری پور

کاپی برائے اطلاع جناب DSP صاحب سرکل خاچور

  
Abdul Aziz Khan Tamoli  
Advocate  
District Bar Abbottabad

25/4/24



اشرفیون 146

SHO-PS-HTC  
25-4-24



Ms No  
Asi. Pr. HTR 18/04/24

Handwritten text in Urdu, appearing to be a detailed report or account. The text is dense and covers most of the upper and middle sections of the page. It includes various lines of text, some with dates and specific details, though the handwriting is somewhat cursive and difficult to transcribe fully.

1254EP	18/04/24
3.11.40	18/04/24
3.10.50	18/04/24
142	18/04/24

Handwritten notes and signatures at the bottom of the page, including a large circular stamp or mark.

Abdul Aziz Khan  
Muzaffarabad  
Handwritten signature and name in the top left corner.

Handwritten text in the middle left margin, possibly a date or reference number.

Handwritten text in the lower middle left margin.

Handwritten text in the bottom left margin, including some numbers and possibly a name.

(1) 20/04/24

03125662044

20

Annex "I"



**DISTRICT POLICE OFFICER  
HARIPUR**

Ph: 0995-920100/01, Fax-0995614714, Email:- dpoharipur1@gmail.com

No. 2201/1

dated Haripur the 15/05/2024

To: The Regional Police Officer,  
Hazara Region, Abbottabad.

5676  
17-05-2024

Subject: REPRESENTATION / APPEAL.

Memo: It is submitted that representation/ Appeal of SI Imtiaz Khan  
No. H/122 of this District is sent here with for further necessary action, please.

Abdul Aziz Khan Tanoli  
Advocate  
District Bar Abbottabad

PA

Attested  
[Signature]

DIG/Hazara  
17/05

District Police Officer,  
Haripur

[Signature]

No. 2720/PA dated 15-5-2024

DPO Haripur

For comments along with  
service record



DS P-legal SRC  
for Complaint

DPO Haripur  
22-05-2024

[Signature]

(21)

**BEFORE THE REGIONAL POLICE OFFICER HAZARA REGION**  
**ABBOTTABAD**

(Departmental Appeal by Imfiaz Khan No. H/122 presently posted at District Haripur)

**DEPARTMENTAL APPEAL AGAINST ORDER OB NO. 275 DATED 16-04-2024 PASSED BY THE DISTRICT POLICE OFFICER HARIPUR WHEREBY APPELLANT HAS BEEN AWARDED PUNISHMENT OF "FORFEITURE OF TWO (02) YEARS APPROVED SERVICE".**

**PRAYER: ON ACCEPTANCE OF INSTANT DEPARTMENTAL APPEAL ORDER DATED 16-04-2024 MAY KINDLY BE SET ASIDE AND APPELLANT BE RESTORED HIS TWO (02) YEARS FORFEITED SERVICE FROM THE DATE OF ITS FORFEITURE WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.**

Respected Sir,

With most reverence the following few lines are submitted for your kind consideration and favorable orders:-

1. That appellant has rendered more than 16 year service in the police department and is presently posted as SHO Police Station Saddar Haripur. Appellant always performed his duties with devotion, dedication and honesty to the entire satisfaction of his superiors and never provided them a chance of reprimand.
2. That without conducting any departmental inquiry issuing a charge sheet or providing a copy of inquiry report, if any, and without serving a show cause notice the District Police Officer Haripur vide his letter OB No. 275 dated 16-04-2024 has awarded the appellant punishment of "forfeiture of 02 (two) years approved service" and that too without taking into consideration the stance and reasons advanced by

*Amir*  
**Abdul Aziz Khan Tanoli**  
Advocate  
District Bar Abbottabad

(Handwritten mark)

the appellant. (Copy of punishment order dated 16-04-2024 is attached as "A").

3. That the allegations as incorporated in the punishment order are incorrect, baseless and frivolous one based on conjecture, surmises and malsfide against the facts and proof.

4. That appellant remained posted as SHO Police Station Hattar (District Haripur) for a period of only three (03) months. During the period he carried out his duties efficiently and effectively and honestly. He left no stone unturned in discharge of his official duties.

5. That it is incorrect and base that appellant has ever been non-serious towards his official duties like security arrangements of 02 Korean Engineers working in Volta Batteries Factory Hattart (Haripur).

6. That appellant made all enthusiastic efforts to take every step for better security arrangement of these Korian Engineers. They are permanent employees of Volta Factory Hattar since 2011. There had been many SHOs in P.S. Hattar in the past in 12/13 years. However, so far appellant's responsibility is concern, Appellant during his position as SHO P.S. Hattar frequently visited and discussed the security matter with the management of Volta Factory and issued necessary advisory instructions about security measures. Even appellant passed them written Advisory Letters dated 01-02-2004 26-03-2004 and

Abdul Aziz Khan Tausif  
Advocate  
District Bar Abbottabad

(Handwritten signature)

04-04-2024 with copies to DSP. (Circle) Khanpur and Reader to DPO Haripur whereupon the Factory Administration wrote a reply letter dated 04-04-2024 addressing the same to DPO Haripur with copy to DSP(Circle) Khanpur as well. **(Copies are attached herewith as "A, B, C & D")**. Not only that even the appellant got registered an FIR dated 18-04-2024 against the Admin Manager of Volta Factory Hattar in this respect. **(Copy of FIR is attached as "E")**.

7.

That not to speak of Volta Factory Hattar even the appellant was well aware of his duties and responsibilities being posted as SHO P.S. Hattar, he visited almost all the factories situated in Hattar Industrial Estate Haripur and minutely checked their all kinds of security arrangement and issued them Advisory Letters strictly instructed them to improve their security in all respects as was necessary. Even FIR were got registered against them. **(Copies of Advisory Letters and FIRs are attached as "F&G")**.

8.

That instead of taking into consideration the appellant's above mentioned efforts and appreciating and encouraging the DPO Haripur has tried to penalized and discourage his subordinate officer appellant by awarding punish of forfeiture of two years approved service which resulted into tremendous loss to appellant in his service career.

That appellant is totally innocent and has discharged his duties with devotion, dedication and

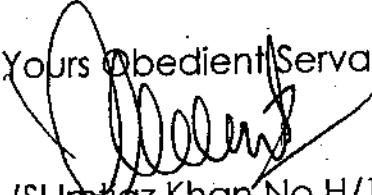
Abdul Aziz Khan Tamoli  
Advocate  
District Bar-Abbottabad  
9.



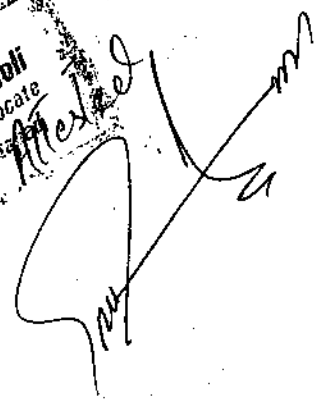
honesty and deserves appreciation for his performance instead of such like punishment.

- 10. That if the appellant is provided with a chance of personal hearing, he will really prove him as innocent by explaining all the facts and circumstances of the matter.

In view of the aforementioned facts it is earnestly requested that order dated 16-04-2024 of the District Police Officer, Haripur may kindly be set aside and the appellant be restored his forfeited Two (02) year approved service from the date it was forfeited with all consequential service back benefits. Appellant shall pray for your good health and long life. Thanking you sir in anticipation.

Yours Obedient Servant  
  
 (SI Inayat Khan No.H/122)  
 P.S. Saddar Haripur  
 HARIPUR.

Dated: 13-05-2024

  
 Abdul Aziz Khan Tanoli  
 Advocate  
 District Bar Abbottabad  
 Attested



25

17/11/2024 J

OFFICE OF THE REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.rpohazara@gmail.com

NO: 4458 /PA DATED: 27/08/2024

**ORDER**

This order will dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by SI Intiaz Khan No. 122/H of district Haripur against the order of punishment i.e. forfeiture of two year approved service awarded by DPO, Haripur vide OB No.275 dated 16-04-2024.

“Brief facts leading to the punishment are that the appelland while posted SHO PS Hattar, it comes to the notice of DPO, Haripur through reliable information/report that 02 Koreans engineers are working in Volta Batteries Hattar. They proceed to Islamabad from work site on daily basis in an ordinary motorcar, which is a clear violation of SOPs and written instructions/directions conveyed to him time and again. In this regards he has been directed to avoid the movement of foreigners without bullet/bomb proof vehicle, but he did not bother to comply the SOPs and written/verbal instructions. His non-serious attitude may lead toward any untoward incident.”

The appelland was issued show cause notice however, he failed to advance any cogent justification in his defense. Consequently, DPO Haripur awarded him minor punishment of forfeiture of two year approved service in summary proceedings. Hence, the appelland submitted this present appeal.

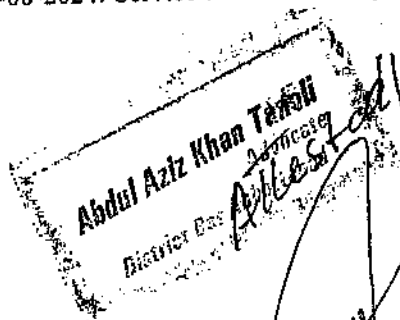
After receiving his appeal, comments of DPO, Haripur was sought and examined/perused. The undersigned called the appelland in Orderly Room and heard him in person and provided him reasonable opportunity to defend the charges leveled against him. However, he failed to advance any convincing justification in his defense. Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 the instant appeal is hereby *rejected/*filed with immediate effect.

TAHIR AYUB KHAN (PSP)  
Regional Police Officer  
Hazara Region, Abbottabad

No. 4459 /PA, dated Abbottabad the 22-8-2024.

Cc.

District Police Officer, Haripur for information and necessary action with reference to his office Memo No. 4485 dated 30-07-2024 and Memo No. 4923 dated 16-08-2024. Service record of the appelland are returned herewith for office record.



کوریٹ فیس

## وکالت نامہ

بعدالت جناب سرورس ٹریبونل پشاور  
 عنوان: امتیاز خاں بنام گورنمنٹ انجینئرنگ کالج  
 منجانب: ایبلٹ

نوعیت مقدمہ:

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام  
 سید السمن بن خاں ایبلٹ لکھی گئی کوڈٹ ایبلٹ ایبلٹ  
 کوڈٹ مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل  
 صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال و دعویٰ اور بصورت دیگر ڈگری  
 کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت  
 ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی  
 بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا  
 ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے  
 مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا  
 حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں  
 کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد  
 اس جارجس نائش بصدیق منطقی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

کہندہ وکالت نامہ تحریر کیا تاکہ سند رہے۔

المرقوم: 20-09-2024

**POLICE DEPARTMENT**

**HAZARA REGION**

**PARTICULARS OF SI**

1. Name:- **Muhammad Imtiaz Khan No.H/122**
2. Domicile:- **Upper Kohistan**
3. Education:- **BA**
4. Present posting:- **SHO PS Lora Abbottabad**

Enlistment with date and rank	Date of promotion as			Date of Confirmation as		
	ASI	SI	Insp:	ASI	SI	Insp:
07-02-2011 PASI	07-02-2011	08-09-2015	--	07-02-2014	08-09-2017	--

**POSTING RECORD**

S.#	PLACE OF POSTING	DATE OF POSTING		PERIOD OF POSTING		
		FROM	TO	YEAR	MONTH	DAY
1.	PASI Courses Upper Kohistan & Mansehra	07-02-2011	25-03-2014	03	01	15
2.	ASI Mansehra District	26-03-2014	31-12-2014	--	09	05
3.	ASI/SI CTD Khyber Pakhtunkhwa	01-01-2015	30-06-2016	01	05	29
4.	SI Upper Kohistan District	01-07-2016	16-08-2016	--	01	15
5.	SI Lower Kohistan District	17-08-2016	30-06-2018	01	10	13
6.	SI Haripur District	01-07-2018	10-06-2022	03	11	09
7.	SI Abbottabad District	11-06-2022	31-03-2023	--	09	20
8.	SI Haripur District	01-04-2023	18-07-2024	01	03	17
9.	SI Abbottabad District	19-07-2024	To date	--	01	02

27

Stamp: **Police Station Lora**  
District: **Abbottabad**  
Date: **19-07-2024**

Signature

