## FORM OF ORDER SHEET

Court of			
Appeal No.	2442/2024		

	<u>Ap</u>	peal No. 2442/2024			
5.No.	Date of order proceedings	Order or other proceedings with signature of judge			
1	2 	3			
1-	11/11/2024	The appeal of Mr. Muhammad Adil Shah			
	;	presented today by Mr. Imtiaz Khan Marwat Advocate. It is			
		fixed for preliminary hearing before Single Bench a Peshawar on 25.11.2024. Parcha Peshi given to counsel for			
		the appellant.			
		By order of the Chairman			
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## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR CAMP COURT AT DERA ISMAIL KHAN.

Service Appeal No. <u>2442</u> /2024

Muhammad Adil Shah.....( Appellant)

#### **VERSUS**

.PPO KP etc .....(Respondents).

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9	Copy of charge sheet and orders	"H & I"	18-20
10	Wakalatnama		2/

Your Humble Appellant

Mullammad Adil Shah

Through Counsel

Dated: **7**/11/2024

IMTIAZ ALI RHAN MAKWAT

Advocate, District Bar, Dera Ismail Khan Mobile #0346-7847274

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR CAMP COURT AT DERA ISMAIL KHAN.

Service Appeal No. <u>2442</u>/2024

**Muhammad Adil Shah** S/o Syed Sabit Shah Resident of Darazinda, District DIKhan, Ex-Constabl No. 2022, Dera Ismail Khan.

.....( Appellant)

#### **VERSUS**

- 1. Provincial Police Officer, Khybr Pakhtunkhwa, Peshawar.
- 2. Regional Polic Officer, Dera Ismail Khan.
- 3. District Police Officer, Dera Ismail Khan.

.....(Respondents)

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST ORDER BEARING NO. 3381/EC DATED 15/05/2024 PASSED BY RESPONDENT NO. 3 VIDE WHICH APPELLANT HAS BEEN DISMISSED FROM SERVICE AND IMPUGNED ORDER BEARING NO. 5201/ES DATED 01/08/2024 WHEREBY RESPONDENT NO. 2 HAS REJECTED DEPARTMENTAL APPEAL FOR NO GOOD REASONS.

## Respectfully Sheweth:-

The appellant respectfully submits as under:-

Inat appellant is naturally bonafide citizen of Islamic Republic of Pakistan and hails from respectable family of District DIKhan

2. That appellant was merged in the Police Department in woke of erstwhile levis and Khasadar force.

<u>3.</u> That appellant always worked efficiently to the entire satisfaction of superior officers.

That appellant remained posted at Aman Mela Check Post w.e.from 28/02/2024 to 30/03/2024 (for period of one month) and showed record recovery of NCP goods.

5. That to the utmost surprise appellant was issued charge sheet No. 1983/EC dated 19/04/2024 with the allegations that while posted as Incharge Check Post "Amman Mela" a video went viral on social media in which

constable Saeedullah No. 2100 posted at "Amman Mela" was seen taking bribe on road side. Copy of charge sheet is enclosed as **Annexure "A"**.

- That acting SP Saddar, Dikhan was appointed as Inquiry Officer to conduct inquiry in accordance with provisions of Police Rules 1975, Amended 2014.
- 7. That appellant submitted comprehensive reply to the charge sheet rebutting all the allegations. Copy of reply is enclosed as **Annexure "B"**.
- 8. That Inquiry Officer conducted Inquiry in sheer violation of Police Rules, ESTA CODE and Principles of natural justice and submitted finding report on basis of hearsay evidence. Copy is enclosed as **Annexure "C"**.
- That respondent No. 3 condemned appellant unheard and awarded major punishment of dismissal from service vide impugned order No. 3381/EC dated 15/05/2024. Copy of the same is enclosed as **Annexure "D"**.
- That RPO DIkhan vide impugned order No. 5201/ES dated 01/08/2024 rejected the departmental appeal of petitioner and upheld the punishment and dismissal from service passed by DPO DIkhan. Copy of the same is enclosed as **Annexure** \*E".
- That appellant has lodged review / revision petition to the respondent No. 1, but no response so far. Copy of the same is enclosed as **Annexure "F"**.
- 12. That now the appellant has no other remedy, but to file instant service appeal before this Honourale Tribunal, inter alia, on the following grounds:-

## GROUNDS:-

- A. That the order passed by the departmental authorities, impugned hereby are arbitrary, discriminatory, legally and factually incorrect.
- B. That the impugned orders are ultra virus, void, ab-initio and militate against principle of natural justice.
- C. That the appellant is innocent and has been subjected to the penalty for no fault on his part.

D. That the Inquiry Officer failed to follow the prescribed procedure and also failed to regulate the departmental Inquiry in accordance with law / rules and erred at the very outset of the proceeding, thus causing grave miscarriage of justice as well as prejudice to the appellant in making his defence.

E. That it is a matter of record that appellant has been vexed in clear defiance of law and principle laid down by the Superior Courts as well the Hononurable Tribunal as could be gathered from the facts and circumstances of the case.

That impugned punishment of dismissal was awarded without any substantial proof or evidence against appellant, thereby violating his fundamental rights of fair trial and justice.

G. That individual cannot be punished for the acts of another, especially when there is no proof of knowledge or assistance.

H. That the constable Saeed Ullah No. 2100 whose video of taking bribe went trial on social media, has been reinstated by RPO DIkhan / respondent No. 2 (the appellate authority). Copy of order is enclose as Annexure "G".

That the respondents failed to appreciate that appellant was declared innocent in another inquiry on the allegation of facilitating the smuggling net work of NCP vehicles by taking bribe in his official capacity. Copy of charge sheet and orders are enclosed as **Annexure** "H & I".

<u>J.</u> That the inquiry conducted was not transparent and appellant was not given a fair opportunity to cross examination.

**K.** That during inquiry no witness was produced to depose against appellant.

L. That appellant was not present on spot and cannot be seen in the video.

M. That no final show cause notice was issued to appellant nor copy of inquiry provided to defend himself.

N. That no opportunity of personal hearing was provided to appellant before passing impugned order of punishment.

That otherwise punishment is too harsh and has deprived the whole family as appellant is sole breadwinner of the family.

P. That the respondents while adjudicating in the matter of departmental proceedings and the appeal of appellant was disposed off in a slipshod manner through orders impugned hereby, thus the award of impugned punishment is patently unwarranted, illegal, ultra virus and nullity in the eyes of law and not maintainable in law.

**Q.** That the petitioner's appeal is duly supported by law and rules formulated there under, besides the affirmation / affidavit annexed hereto.

**R.** That this Honourable Tribunal is competent and has ample powers to adjudge the matter under reference / appeal.

S. That counsel for the appellant may graciously be allowed to raise additional grounds at the time of arguments.

It is, therefore, humbly prayed that on acceptance of instant service appeal, the impugned order No. 3381/EC 15/05/2024 issued by respondent No. 03 and impugned order of departmental appeal bearing No. 5201/ES 01/08/2024 issued by respondent No. 2 may please be set aside and the appellant may graciously be reinstated into service with all back benefits. Any other relief deemed appropriate in circumstances of the case may also be allowed in favour of appellant in the large interest of justice.

Your Humble Appellant

Muhammad Adil Shah

Through Counsel

Dated: 7/11/2024

IMTIAZ ALI KHAN MARWAT

Advocate, District Bar, Dera Ismail Khan Mobile #0346-7847274

## 5

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR CAMP COURT AT DERA ISMAIL KHAN.

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

Muhammad Adil Shah.....( Appellant) **VERSUS** 

PPO KP etc .....(Respondents).

#### CERTIFICATE:-

It is certified that no such like amended appeal has been lodged by appellant, prior to the instant one against impugned order of revision.

## **Deponent**

## **AFFIDAVIT:-**

I, Muhammad Adil Shah S/o Syed Sabit Shah Resident of Darazinda, District DIKhan, Ex-Constabl No. 2022, Dera Ismail Khan, the appellant, do hereby solemnly affirm declared on oath that contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

IDENTIFIED BY:

mt-2

IMTIAZ ALI KHAN MARWAT

Advocate, District Bar, DIK

C. 8 No. 154/2024



Amenturi A"

# OFFICE OF THE . DISTRICT POLICE OFFICER DERA ISMAIL KHAN

No. 1987 /EC,

Dated

0914/2024

#### CHARGE SHEET

I, NASIR MEHMOOD, DISTRICT POLICE OFFICER, DIKHAN, as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you Constable Adil Shah No. 2022, rendered yourself liable to be proceeded against departmentally as you have committed the following act/omissions.

You while posted as Incharge at Aman Mela Check Post DIKhan, a video went viral on social media in which Constable Saeed Ullah No.2100 posted at Aman Mela Check Post DIKhan was seen taking bribe at road side. Above commission/omission falls in the purview of gross misconduct and renders you liable to be punished under Khyber Pakhtunkhwa Police Rules 1975 amended-2014.

- 2. By reasons of the above, you appear to be guilty of misconduct under Rule 3 of the Rules ibid and have rendered yourself liable to all or any of the penalties specified in the Rule 4 of the Rules ibid.
- 3. You are, therefore, required to submit your written statement within 07days of the receipt of this Charge Sheet to the enquiry officer.

Vous written defense if any should reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and ex-parte action shall be taken against you.

A statement of allegation is enclosed.

Allested Intz

ISTRICT POLICE OFFICER
DERA ISMAIL KHAN

4.

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# OFFICE OF THE DISTRICT POLICE OFFICER DERA ISMAIL KHAN

No. 1983/EC,

Dated

09/4/2024

## DISCIPLINARY ACTION

I, NASIR MEHMOOD, DISTRICT POLICE OFFICER, DIKHAN as competent authority, under Khyber Pakhtunkhwa Police Ruie 1975 (Amendment 2014) am of the opinion that you Constable Adil Shah No.2022, rendered yourself liable to be proceeded against departmentally as you have committed the following acts/omissions.

## STATEMENT OF ALLEGATIONS

You while posted as Incharge at Aman Mela Check Post DiKhan, a video went viral on social media in which Constable Saeed Ullah No.2100 posted at Aman Mela Check Post DiKhan was seen taking bribe at road side. Above commission/omission falls in the purview of gross misconduct and renders you liable to be punished under Khyber Pakhtunkhwa Police Rules 1975 amended-2014...

2. For the purpose of scrutinizing the conduct of said accused with reference to the above singertions is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Rule-1975, provide reasonable opportunity of hearing to the accused official, record his findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.

DISTRICTI POLICE OFFICER
DERAISMAIL KHAN

No. 1934 - 352 - YEC

2,

dated

69 14:12024.

Copy of above to:

The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Rule-1975 with the direction to submit his finding report within 03-days positively.

The <u>Accused officer</u>, with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him, for the purpose of enquiry proceedings.

pusted Intz

Amelin B

## بخدمت جناب SP صاحب صدر سركل ذيره اساعيل خان

## بحواله آفس آرڈ رنمبر 1983/EC مورخه 199/04/2024 بایت جارج شیٹ/الزامات

## <u> جواب نولش منجانب سائل ا كانشيبل عاول شاه نمبر 2022</u>

جناب عالى! سائل حسب ذيل جواب پيش كرتا -

ا۔ بیکہ سائل ابتدائی طور پر سابقہ فاٹا میں لیویز پولیس میں بطور کانشیبل تعینات تھا۔ فاٹا کے خیبر پختونخواہ میں ضم ہونے کے بعد سال 2019 میں سائل خیبر پختونخواہ پولیس میں بطور کانشیبل تعینات ہوا۔ سائل نے ہمیشہ پوری ایمانداری اور جانفشانی کیساتھ اپنی ڈیوئی سرانجام دیتار ہاہے۔

۲۔ یہ کہ سائل نے خیبر پختو نخواہ بدلیس میں مختلف مقامات پراپی ڈیوٹی سرانجام دی اور جارج شیٹ عنوان بالا سے قبل مغل کوٹ تھانہ اور امن میلہ چیک پوسٹ پر بھی ڈیوٹی سرانجام دی ہے۔

س\_ پیکدامن میلہ چیک بوسٹ پرسائل نے بطورانچارج آئی ڈیوٹی سرانجام دی اور بھیشہ پوری جانفثانی کے ساتھ اپنے فرائض منصی سرانجام دیئے اور افسران بالا کوشکایت کا کوئی موقع نہیں دیا۔ اس نسبت سائل کا سروس ریکارڈ واضح ہے۔

سمر یک میکوره بالا ڈیوٹی کے دوران من سائل نے سمظرز کے خلاف کافی کامیاب کاروائیاں کیں جو کہ ریکارڈ پرموجود ہیں جو بحکم افسران بالامحکمہ سلم کے حوالے کئے گئے ہیں۔

2۔ یہ کہ نہ تو سائل کسی بھی غیر قانونی ،غیر پیشہ وارانہ سرگرمیوں میں ملوث رہاہے اور نہ بی سائل کے خلاف آج تک کوئی شکایت افسران بالا کو موسول ہوئی ہے ۔بلکہ افسران بالا نے من سائل کی ڈیوٹی کو ہمیشہ Appriciate کیا۔

۲۔ یہ کہ سمی سعیداللہ کانشیبل کی ایک ویڈیوسوشل میڈیا پروائرل ہوئی۔سائل کا نہ تو اس وڈیو کے ساتھ کوئی تعلق ہے اور نہ ہی ویڈیو میں طاہر کر دہ وقوعہ میں سائل کا کوئی کر دار ہے۔ بلکہ سائل بالکل بے گناہ ہے۔

2۔ یہ کہ نہ کورہ بالا ویڈیویا ویڈیو بین طاہر کر دہ وقوء کے ساتھ سائل کا کوئی تعلق نہیں ہے کیونکہ سائل نے اپنے تمام کیرئیر میں ایمانداری کے ساتھ اپنے فرائض منصمی سرانجام دیتے ہیں اس نسبت سائل کا سروس ریکارڈواضح ہے گام کیرئیر میں ایمانداری کے ساتھ اپنے فرائض منصمی سرانجام دیتے ہیں اس نسبت سائل کا سروس ریکارڈواضح ہے

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۸۔ یہ کہ ساکل ایک غریب گھرانے کا چٹم و چراغ ہے اہلخانہ کی کفالت کی ذمہ داری سائل کے کندھوں پر ہے اور سائل کا واحد ذریعہ معاش ملازمت ہے اور دیگر کوئی بھی ذریعہ معاش نہیں ہے اس لئے بھی سائل کے ساتھ ہدر دار نہ دوید کھتے ہوئے چاری شیٹ نہ کورہ بالا کو داخل دفتر فرمانا عین قرین انصاف ہے۔

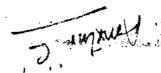
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مودقه 18/04/2024

عادل ثاه كانشيل بيك نمبر 2022 رابط نمبر 0341-0618288

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ورغونال ملوي منوي اله 2022 والأران المراهية أبر<sub>و</sub>وج

بالدبان

لة الولجا برأي فان إلى المرابعة المناه الدال في عدوف الرابعة ويعال بين الما بعد المام المارية 2019 كالسلاخ معرف في المختنج بيغط والقد ليقال بين المبين ليابيد ما يدون منال بي الماريك والماري المرايد جوالكثيب المرائب

والماك المك المكل كأحدال والعاعث يشق لها المارا لجارن يا الإلات التسطة بدر ملي المختف بدك المرسل

المنابه والمناكف المختالة المناب لايداء الماري المناب الماري المنابئ الماري المنابي في المناب المنابي المنابي -جــالىدلىخابرىكىغالى برخسى سويك

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- رية شريد المحراب ال

يكدندكاك كالمخوذن فيريي الدكرك للحدباج المدايا المحالات المخالة في المحالية المناهجة المنافعة المحالية المناكرة

كهداند وفيدن المجاملة المقادك وفيارا أنداك المعاليك المنافظ في الماليك المنافئة والمنافئة المناسيد لاسك 9--يا Appricate عدويال الماليان الماليان

- جـ ، نترف كابرلام الجب بيران الامالاس الماية ،

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سپرنتندند پیس مدرسرگل خرواسامیل خان Superintendent Police Saddar Circle D.I. Khan

(40)





## OFFICE OF THE DISTRICT POLICE OFFICER DERA ISMAIL KHAN

Tel: (0086) \$280062 Fax (0986) 3280283

Dated.

/5/05/2024

#### ORDER

This order is aimed to dispose-off the departmental proceedings conducted against Constable Adil Shah No. 2022, of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014) vide this office C/S No.154/2024 on the following

He while posted as Incharge, at Aman Mela Chack Post DiKhan, a video went viral on social media in which Constable Saeed Ullah No 2100 posted at Aman Mela Check Post Dikhan was seen taking bribe at road side. Above commission/omission falls in the purview of gross misconduct and renders him liable to be punished under Khyber Pakhtunkhwa Police Rules 1975 amended-2014.

Mr. Umar Hayat Acting Superintendent of Police Saddar DIKhan was appointed as Enquiry Officer with the directions to conduct proper Departmental Enquiry against him and submit finding report in which he stated that the above named incharge Check Post is found guilty of the charges leveled against him. Enquiry Officer recommended to award him suitable punishment.

Keeping in view of finding report of the Enquiry Officer and conduct of the definition to Constable; the undersigned came to the conclusion that the charges leveled against him have been proved beyond any shadow of doubt.

Therefore, in exercise of powers vested upon l, NASIR MAHMOOD, PSP District Police Officer DIKhan, hereby awarded him "Major Punishment of Dismissal from Service" with immediate effect.

Order Announced

08 No. 918 | Dated: |515/2024

AHMOOD PSP

District Police Officer

Dera Ismail Khan



Amature E OFFICE OF THE regional police officer

DERA ISMAIL KHAN REGION 🛇 0966-9280191 Fax # 9280290 Oblin 106 102 0019 OFFICE BAKHAN

dated D.I.Khan the ORDER

this order disposes off departmental appeal filed by Ex-Constable Adil Shah No. 2022 of District Police DIKhan, against the order of Major Punishment of (Dismissal from Service), passed by the DPO DIKhan, vide his office OB No. 918 dated 15.05.2024 on the following allegations:

- "He while posted as in charge at Aman Mela check post DIKhan, a videa went viral on social media in which Constable Saced Ullah No. 2100 posted at Aman Mela Check post DIKhan was seen taking bribe at road side. Above commission/omission purview of gross misconduct and renders him liable to be punished under KF Folice Rule 1934, amended 2014.
- DPO D.I.Khan served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Umar Hayat Acting Superintendent of Police Saddar Dikhan who in his finding, report in which he stated that above named in charge check post is found guilty of the charges levelled against him. Enquiry officer recommended for suitable punishment.
- The appellant was awarded Major Punishment of "Dismissal from service" by the DPO D.LKhan vide his office OB No. 918 dated 15,05.2024.
- 4.1 Heard in person on 01.08.2074, in orderly room by undersigned and his service record & finding of the inquiry officer are also perused. He was given ample opportunity of due process and natural justice against the charges under which DPO DIKhan has awarded him Major Punishment "Dismissat from Service". His written as well as verbal response is found to be unsatisfactory and ecoplansible.
- Keeping in view the above, I. NASHR MEHMOOD SATTI, PSP, Regional Police Officer. Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11, clause-4 (a), of the Police Rules 1975. Amended 2014, do not littend to take a lenient view, therefore REJECT his appeal being merifless and uphole the order of Major Punishment of (Dismissal from Service), passed by District Police Officer DIKhan vide his OB No. 918 dated 15.05.2024, with immediate effect.

Order Announced,

(NASIR MEHMOOD SATTI)PSP

Regional Police Officer Dera Ismail Khan

Copy of above is sent to the DPO DIKhan with reference to his office letter No.

3546/EC dated 04.06.2024, (Encl: Service Roll & Pauji Missal).

CNASIR MEHMOOD SATTIPSP

Regional Police Officer g Dora İsmail Khan

District Police Offices Dera Ismail Khan

All Ant 2

# OFFICE OF THE REGIONAL POLICE OFFICER DERA ISMAIL KHAN REGION 0966-9280291 FAX 09280290

No.520/ES dated DIkhan the 01/08/2024.

#### ORDER:-

- This order disposes off departmental appeal filed by Ex-Constable Adil Shah No. 2022 of District Police DIKhan, againt the order of Major Punishment of (Dismissal from Service), passed by the DPO DIKhan, vide his office OB No. 918 dated 15/05/2024 on the following allegations;
- The while posted at Aman Mela Check Post DIkhan, a video went viral on social media in which he were seen taking bribe at road side. Above commission / omission falls in the purview of gross misconduct and renders him liable to be punished under KP Police Rules 1975, amendd 2014.
- 3. DPO, DIkhan served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Umar Hayat Acting Superintendent of Police Saddar Dikhan who in his finding report in which he stied that above named in charge check post is found guilty of the charges leveled against him. Enquiry officer recommended for suitable punishment.
- 4. Heard in person on 01/08/2024, in orderly room by undersigned and his service recod and finding of the inquiry officer are also perused. He was given ample opportunity of due process and natural justice against the charges under which DPO DIKhan has awarded him major punishment "Dismissal from service". His written as well as verbal response is found to be unsatisfactory and not plausible.
- 5. Keeping in view the above, I Nasir Mehmood Satti, PSP, Regional Police Officer, Dera Ismail Khan in exercise of the powers conferred upon me under Rule-11, clause-4 (c) of police Rules 1975, with amended 2014, do not intend to take a lenient view, therefore reject his appeal being meritless and upheld the order of major punishment of "Dismissal from service" passed by DPO DIkhan vide his office OB No. 918 dated 15/05/2024, with immediate effect.
- 6. Order Announced.

(Nasir Mehmood Satti) PSP Regional Police Officer Dera Ismail Khan.

No. 5202/ES

Copy of above is sent to the DPO DIkhan with reference to his office letter No. 3546/EC dated 04/06/2024, (Encl; Service Roll & Fauji Missal).

Nasir Mehmood Satti )PSP Regional Police Officer, Dera Ismail Khan. Ametur F" 14

## بحضور والأشان عزت ما آب جناب انسيئر جزل آف بوليس بخيبر ويحتون خواه

أيل بات بعال مروس بحثيث كل علي بوليس أزال X تنسفيل عادل شاه تم 2022 برخلاف آرد رتم ر 5201/ES موديد 2024-08-01 كاربياز وفتر منت ريجنل بوليس آفيسر معاحب أرواسا عمل خال

محنوان

بناسه عال --

سیکه سائل ادمی با تحت بطور تنسفیل لیویز فررس سے محکمہ پولیس بی ضم بوکر ڈاپوٹی سرانجام دے رہا ہے اور این دررانی ترصیسروی بیل مجمی بھی کمیٹر، پر مجمی شوو شکایت کو متوجب نہیں بنا ہے اور نساق کمیمی زشوت یا سفارش کا سہا ،الیا ہے ( سروس، ایغارڈ ملا حذو کیا جا

یر کنتظیل سعیدانته 100 فی کی تمام رود میداد (محکماندا کوائری) اوردائر آن کی ویڈ پوندای چیک بوست بذاریب آورندای ایسے (ساک یکوئلم یہ کوقالہ من سائل کو کر بھاند نے کال کر کے بتانا یا کہ وہ چیک پوسٹ سے کو وہ کوئیاندہ ماخری کو سیاجس پرسائل نے تھاندورا وزیدہ حاضری کی جمو تھاندہ معلوم ہوا کہ است کنتشیل سعیدانند 2100 کو یہ یو اور اور کو اجب سے کو ذائع ہے ہے اور اس کر دورکا واقعہ ہے جس روز سے (ساک) کو کو ترکیمیں تھاں رائل ساکن اس ساوے واسقے سے تفعال اعظم تھا کیونکہ بعد ہے ہراوی حاوم ہوکہ ہوا اقعہ رہیک پوسٹ پرنیس ایک چھانا صلہ پر مشیرخان کی دکان پر چیش آ با تھا

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Mobile # 0003-8648288 CMIC# 22301-6613697.3

## بحضور والاشان عزت ما آب جناب انسيكثر جنرل آف يوليس خيبر پختونخواه۔

عنوان ؛ ۔ اپیل بابت بحالی سروس بحثیت کنسٹیل محکمہ پولیس ازاں Ex کنسٹیل عادل شاہ نمبر پر 2022 مورخہ 01/08/2024 مجاریہ از دفتر رئیس فیسر صاحب ڈیرہ اساعیل خان ۔ رئیجنل پولیس آفیسر صاحب ڈیرہ اساعیل خان ۔

ئاب عالى!

ریک سائل اونی ماتحت بطورکنٹیل لیوزفورس سے محکمہ پولیس میں خم ہوکرڈ ہونی سرانجام دے رہا ہے اوراس دورانی عرصہ سروس میں بھی بھی کہیں پر بھی شکوہ شکایت کا مؤجب نہیں بنا ہے اور نہ ہی بھی رشوت یا سفارش کا سہارالیا ہے (سروس ریکارڈ ملاحظہ کیا جاسکتا ہے )۔

یے کہ سلیل سعیداللہ 2100 کی تمام تر روئیداد (محکماندائلوائری) اوروائرل کی ٹی ویڈ بوندہی چیک بوسٹ ہذا پر ہے اور مذہی اسے (سائل ) کو علم ہے کیونکہ من سائل کو محررتھاند نے کال کر کے بتلایا کہ وہ چیک بوسٹ سے کلوز ہو کرتھانہ صاضری کر ہے جس پرسائل نے تھاندورا زندہ حاضری کی ، محررتھانہ سے معلوم ہوا کہ اسے کنسٹیل سعیداللہ 2100 کی ویڈ یو وائرل ہوئی وجہ سے کلوز کیا گیا ہے اورای روز کا واقعہ ہے جس روز سے (سائل) کو کلوز کیا گیا تھا حالانکہ سائل اس سارے واقعے سے قطعاً لاعلم تھا کیونکہ بعد پیتہ براری معلوم ہوا کہ میدواقعہ چیک پوسٹ برنہیں بلکہ پچھ فاصلہ پر شمیرخان کی وکان پر چیش آیا تھا۔

-جـ تع فراهدن المحديه راه جـ الله بياسة المنها بي المحاود اللها ناله المرابع الماري المراكالالم كالمراي المحل كأربي بالمرابع ويرأي بالمادي عروم الماري المعالي المرابع المرابع المحارية المرابع المراب قراري للدر (جرسط هيه والدري لامند) جران المحاوط لين الركاري 11/08/2024 عنه 2501/ES بين ئارآلاه فيرسيال يالم بي لمنج بداي كورلا الريواه الداري مدياب لعرسيال يالمج ببداي كالدارك المسلسلين مدر جونة وله المهادي الأفادية المايدات بهاي برساء المحرف الماداء المكرار دويد سابخد وري المارك لايذا المال ورا Amembran كالماكي في (6) في المقرر إيذ المقال المعربي المراجية في المراجية المعرب المراجية من المعرب الما الما كى كأرخد بدك المك كالمحالية الدير المرك المجدال ك المناهدة الماء الماجد الإن المجولات المادة المادة المادة الم يداكان نائد كالبنائد المبارك المارات كالمراداة المالا كالمارية المالا المالية 
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REGIONAL POLICE OFFICER
DERA ISMAIL KHAN

REGION

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Bated OC 1:08 202 4.

DPO OFFICE DIKHAN

01 /108/2024

ORDER

1. This order disposes off departmental appeal filed by Ex-Constable Saced Ullah No. 2100.

- against the order of Major Punjshment of (Dismissal from Service), passed by the DPO DIKhan vide his office OB No. 962 dated 21.05.2023 on the following allegations that:

  2. "He while posted at Aman Mela check part DIKhan a mid-
- 2. "He while posted/at Aman Mela check post DIKhan, a video went viral on social media in which he were seen taking bribe at road side. Above commission/omission falls in the purview of gross misconduct and renders him liable to be punished under KP police rules 1975, amended 2011."
- i. DPO D.I.Knan served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Umar Hayat Acting Superintendent of Police Saddar DIKhan who in his finding, report in which he stated that above named in charge check post is found guilty of the charges levelled against him. Enquiry officer recommended for suitable punishment.
- 3. On the recommendation of the inquiry officer the appellant was awarded Major Punishment of "Dismissal from service" by the DPO DIKhan vide his office OB No. 962 dated 24.05.2024.
- 4. Perusal of the service record of the applicant, findings of inquiry officers and also heard in occson on 21.08.2024. His oral and written response did not fully satisfy the undersigned.
- 5. Nevertheless, I, NASIR internation SATEL, PSE, Regional Police Officer, Dera Ismail Khun in overcies of the powers conferred upon me under Rule-11, clause-4 (c), of Police Rules 1975, with amendments 2014; hereby take a lenient view and REINSTATED him into the service with immediate effect. The order of Major Punishment of "Dismissal from Service" passed by DPO DIKtum vide his diffice OB No. 962 dated 21.05.2024, is converted into Minor Punishment of "Forfeiture of two-year approved service". His intervening period is treated as leave of kind due.

Order Announced.

(NASIR MELIMOOD SATTI)PSP

Regional Police Officer

Dera Ismail Khan

No. 5200 /ES.

Copy of above is sent to the DPO DIKhan with reference to his office letter No. 3966/EC dated 01.07.2024. (Encl: Service Roll-& Fauji Missal).

50 / Et/OHC/P.C

District Philice Officer Dera Ismail Khan

(NASIR MEHMOOD SATTI)PSP

Regional Police Officer

Dera Ismail Khan

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# OFFICE OF THE REGIONAL POLICE OFFICER DERA ISMAIL KHAN REGION 0966-9280291 FAX 09280290

No.5199/ES dated Dikhan the 01/08/2024.

#### ORDER:-

- 7. The order disposes off departmental appeal filed by Ex-Constable Saeed Ullah No. 2100, against the order of Major punishment of (Dismissal from service), passed by the DPO DIkhan vide his office OB no. 962 dated 21/05/2023 on the following allegations that;
- 8. 2. The while posted at Aman Mela Check Post Dikhan, a video went viral on social media in which he were seen taking bribe at road side. Above commission / omission falls in the purview of gross misconduct and renders him liable to be punished under KP Police Rules 1975, amendd 2014.
  The DPO, Dikhan served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Umar Hayat Acting Superintendent of Police Saddar Dikhan who in his finding report in which he stied that above named in charge check post is found guilty of the charges leveled against him. Enquiry officer
- On the recommendation of the Inquiry officer the appellant was awarded major punishment of "Dismissal from service" by the DPO Dikhan vide his office OB no. 962 dated 21/05/2024.

recommended for suitable punishment.

- 10. Perusal of the service record of the applicant, findings of Inquiry officers and also heard in person on 01/08/2024. His oral and written response did not fully satisfy the undersigned.
- 11. Neverthless, I, Nasir Mehmood Satti, PSP, Regional Police Officer, Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11, clause-4 (c) of police Rules 1975, with emdnement 2014, hereby take a lenient view and Reinstated him into the service with immediate effect. The order major punishment of "Dismissal from service" passed by DPO Dikhan vide his office OB No. 952 dated 21/05/2024, is converted into minor punishment of "Forfeiture of two year approved service". His intervening period is treated as leave of kind due.
- 12. Order Announced.

(Nasir Mehmood Satti) PSP Regional Police Officer Dera Ismail Khan.

No. 5200/ES
Copy of above is sent to the DPO DIkhan with reference to his office letter No. 3966/EC dated 01/07/2024, (Encl; Service Roll & Fauji Missal).

Nasir Mehmood Satti )PSP Regional Police Officer, Dera Ismail Khan.

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24/90/94 يوليس لائن ذيره بيل ابني حاضرى كم اربوري TRPO با جامب دُرِهُ 1/08/24 مِورود 4/08/24 مِارِدِين ب APO مباحب دُرِهُ مُثَمِّرِي جا ر دوباره سردیں پر بجال کئے جانے کا تھم کیا " عمیل سعید الله، 2100/1 کی محکمان با/1001كالائي/ياكيا. إابيل بسلسله بحالي سروس بحواله أرؤرنم ليا ہے۔ جو كه بحوالہ مدنبر 37 روز نامجة رچکا ہے۔ جس پرتاریخ حاضری

ۇسۇل يولىس اندىر ھىلىقى كەلسامىل خان - OB 1444

dated 13/08/2024

C/S No.160/2024



## OFFICE OF THE DISTRICT POLICE OFFICER **DERA ISMAIL KHAN**

Dated

#### CHARGE SHEET

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I, NASIR MEHMOOD, DISTRICT POLICE OFFICER, DIKHAN, as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you Constable Adil No.2022, rendered yourself liable to be proceeded against departmentally as you have committed the following act/omissions.

You while posted at Aman Mela Check Post DIKhan, during the course of investigation a government agency has unearthed a network of NCP vehicles, in which you are suspected to be involved in facilitating the smuggling network of NCP vehicles by taking bribes in your official capacity. Above commission/omission falls in the purview of gross misconduct and renders you liable to be punished under Khyber Pakhtunkhwa Police Rules 1975 amended-2014.

- By reasons of the above, you appear to be guilty of misconduct under Rule 3 of the Rules ibid and have rendered yourself liable to all or any of the penalties specified in the Rule 4 of the Rules ibid.
- 3. You are, therefore, required to submit your written statement within 07days of the receipt of this Charge Sheet to the enquiry officer.

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

A statement of allegation is enclosed.

Allerted Intz

ICE OFFICER

DERA ISMAIL KHAN



28-58-00 17 17 (mg)

## OFFICE OF THE DISTRICT POLICE OFFICER DERA ISMAIL KHAN

No. 2097 /EC,

Dated

17/4/2024

#### DISCIPLINARY ACTION

I, <u>NASIR MEHMOOD</u>, <u>DISTRICT POLICE OFFICER</u>, <u>DIKHAN</u> as competent authority, under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) am of the opinion that you <u>Constable Adil No.2022</u>, rendered yourself liable to be proceeded against departmentally as you have committed the following acts/pmissions.

## STATEMENT OF ALLEGATIONS

You while posted a Aman Mela Check Post DIKhan, during the course of investigation a government agency has unearthed a network of NCP vehicles, in which you are suspected to be involved in facilitating the smuggling network of NCP vehicles by taking bribes in your official capacity. Above commission/omission falls in the purview of gross misconduct and renders you liable to be punished under Khyber Pakhtunkhwa Police Rules 1975 amended-2014.

above allegations \_\_\_\_\_\_\_is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Rule-1975, provide reasonable opportunity of hearing to the accused official, record his findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

The accused official shall join the proceeding on the date, time and place fixed by the enquiry officer.

DERA ISMAIL KHAN.

No. 2078 - 77 /EC,

dated

17/01/12024.

Copy of above to:
1. The Enquiry Officer for initiating proceedings against the accused under the provisions of Folice Role 1975 with the direction to submit his finding report within O8-days positively.

 The <u>Accused officer</u>, with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him, for the purpose of enquiry proceedings.

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No. 268./ 1EC.

### OFFICE OF THE DISTRICT POLICE OFFICER DERA ISMAIL KHAN

Tel: (0966) \$210067 Fax (0986) \$210793

Dated. 9/

ORDER

This order is aimed to dispose-off the departmental proceedings conducted against <u>Constable Adil Shah No.2022</u> of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014) vide this office C/S No 160/2024 on the following allegations:

He while posted at Aman Mela Check Post DIKhan, during the course of investigation a government agency has unearthed a network of NCP vehicles, in which, he is suspected to be involved in facilitating the smuggling network of NCP vehicles by taking bribes in his official capacity. Above commission/omission falls in the purview of gross misconduct and renders him liable to be punished under Khyber Pakhtunkhwa Police Rules 1975 amended-2014.

Mohammad Ishaq the then Acting Superintendent of Police City DIKhan was appointed as Enquiry Officer with the directions to conduct proper Departmental Enquiry against him and submit finding report in which The Enquiry Officer submitted his finding report in which he stated that the Constable Adil Shah No.2022, is not found guilty of the charges leveled against him. Enquiry Officer recommended to file his departmental er quiry, please.

Geping in view of inding reports of the Enquiry Officers and conduct of the delinquent Constable, the undersigned came to the conclusion that the charges leveled against him have not been proved.

Therefore, in exercise of powers vested upon undersigned, J. NASIR MAHMOOD, PSP District Police Officer DIKhan, hereby "File" his departmental enquiry with immediate effect.

Order Announced

OB No. 1/5 2/

Dated: 2/ /5 /2024

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ASIR MAHMOOD PSP

Dera Ismail Khan

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Valid upto:

KP Bar Council

Date of Issue: March 2024 PC-11-5841 Advocate

IMTIAZ ALI KHAN

AVIS COUNCIL

WHARIST BURITINIKHMÜ

## بمسنور والاثنان مزت مآب بناب ديجنل يوليس آفيير صاحب بمادر الأيره اساميل خان ديجن فريره اساميل خان مؤان: ايل سروس از سايد كانستيل عادل شاه نبر 2022 ورطاف: إسسل آراد فهر 3881/EC مور في 2024 15.05. عاريه جناب ومنرك يوليس آفير مياحب، منلع ورواسا ميل خالنا

جناب عالى!

سود باند گزارش بحصور انور ہے کہ من سائل EX انسٹیبل عادل شاہ نمبر 2022ء سال 2019میں ، لیویز قورس سے تحكه پولیس میں منم ہوكر جمم السران بالاانتانی دلجوئی، و باننداری اور خوش اسلوبی سے ڈیوٹی سرانجام دے دہا تھاكہ اس دوران اسكی تعیناتی اس مید چیک پوسٹ پر کی گئی جو کدا سکی کل تعیناتی بیرید عرصه ایک ماه ربی ہے ،اس قلیل عرصه میں وہ انتہائی دیا تنداری سے ڈیوٹی سرانجام دے رہاتھا کہ ایک ناکروہ کماہ جس ہے وہ بالکل بی لاء علم تھا، میں بغیر کسی تھوس تبوت / وجہ سے مئور والزام شمر اکر ا کوائری آفیر صاحب (SP صدر) نے مناسب سزا کے لیئے فحریر کیا جس پر جناب DPO صاحب نے انتنائی بڑی سزا (سروس ے بر خواسکی کا تھم /آر ڈر جاری کمیا(آرڈر کا بی برائے ملاحظہ لف ہے) اندریں سلسلہ من سائل حسب ذیل عرض رسال ہے کہ، یہ کہ من سائل ادنی احجت بطور کانسٹیسل لیویز فورش ہے محکہ پولیس میں صلم ہو کر ڈیوٹی سرانجام دے رہاہے اوراس ووراسیہ عرصہ سروس میں تہمی بھی کمیں پر بھی دشکوہ، شکایت کا محوجب نہیں بناہے اور نہ ہی تمھی کمیں پر بھی شکوہ شکایت کا محوجب نہیں بنااور نہ

ہی مجی رشوت پاسفارش کا سمار الیاہے (سروس ریکارڈ ملاحظہ کیا عاسکتاہے)۔

په كه جب وه قعانه درازنده چيك پوست امن ميله پر تعينات قيانواسكي عدم مه جو دگي ميں ايك كانسٹيبل (سعيد الله 2100) كي اسو قت واليو بنائي كى جب وه (سيعد الله 2100) اسبين رشته دار (كزن) كى لكريال نروستكى كارتم وصول كرر ما تفا-جوكه واليومين ويكها جاسکتا ہے کہ وہ چیک پوسٹ سے فاصلہ پر کھوا تھااور اسکے ساتھ دو تین بندے کی موجو ، شخے ، جبکہ (سائل) کی ایکے ساتھ یآس پاس سمی تم کی موجود گی نئیں ہے (وڈیو ملاحظہ کی جاسکتی ہے)۔ یہ کداز خود کا نسٹیس اسید بنایہ 2167 نے دوران محکمانہ آنکوائر کی روبرو ا كوائرى آفيربيان ديكار ذكر واياب كداس في اب رشة دار (كزن) كى لكويان فرونشگى كارتم سلخ-/6500 (چە بزاريا جيسو )رویے اس وجہ سے د صول کیئے تھے کہ وہ خود (ماہر مضان)روزہ کی وجہ سے نہیں آسکتا تھا، جواس متعلق کانسٹیبل مذکورہ اپنے رشتہ دار (کرن) کو بھی پیش کر چاہے میرجس جگد لکڑیاں پڑی ہو گی تھیں اس د کا ندار نے بھی تصدیق کی ہے کہ یہ لکڑیاں

(عبدالمالك) ناي شخص كى بين، جوكه أيك مزده والاده لكربيان خريد ناجا بتناتقا بدين وجداسه وكاندار في بتلا ياكد ب خك يه لكزيان عبدالمالك كى ين مكروهاس وقت موقعه يرموجود منين بالستراس كاكزن (سعيدالله) بجواس في سعيدالله (كانسيبل) كوكال كى كدآ جادا كيد مزدور دالالكزيال خريد نا جابتا ہے اس سے رقم لے لوجس پر سعيد الله 2100 اسكى د كان پر ميااور لكريوں كى قيمت ملغ -/6500 وصول كيئے تھے ، دوران محكمانه روم والكوائرى آفيسر كانسٹيبل سيعداللد 2100 كرن عبدالمالك اور وكاندار كشمير خان سكنہ في ميار درازندہ كے بالترتيب بيانات فلمبند كيئے جوكہ كانسٹيبل ندكورمبيدالله 2100 كے بيان كى تا يمدكرتے ہيں (محكمانہ انكوائرى برخلاف سيعد الله 2100 ملاحظه يمجاستن 4)-

- فيراد فالتاهد المراد المرجول المراد الإنداية الميقاتان فالتناري ك بنزائس ماء - جونا ولاه كالأب وخير الوركيث لايك ، دور مدال ما المائع الملك م جراعه جدال القالون لاسلا مداله وجد مكري أعلى المالي المساعة المساعة المساعة المعادية المساعة والمساعة والمساعة والمساعة والمساعة والمساعة والمساعة والمساعة والمارية المساعة والمساعة ك عندا المعدمة للا كذير والمداد المال الما ١١١٠ - المي المارك المراجد الموالة المالان رور والمحال المي الأولا المارالة المارك وسناي كرفاسان عالم ساردو يرساع دولان عرفارس دونا المامال ودواره الإراج سينا وسين عاب الانزاعة שלניל לני אי אי אי אי אי אי לרטר על באי מלאוון באורב אווקר אוויף אל אוופחלוופחו (2014) 1975)، روي والمالي المالي الما לשיאוות שי בי בי בי בי בי לב הר של יום בי אות בעל אים של לב היום בי ליום בי לה היות של בי לי היות של בי לי היו محركى تدليسة دف والمدين والمرسنة فالدفك 100 ماسيد مايية الميادا الماد مد من - جدال برير ٠٠٠٠ الدرال الدرال الدرام الماريك الماريك المراك المراك المارية المراك المراج المراك المرك المراك المراك المرك المراك ا الأله كولاك مرائدالما الميشا المنيش العربور المراه بجداله الميا المراه الما الما الما الما الما الما الميا الم سيني كدراله تجدايد الموالا له ليال هدر ما يا يدال لول الدين الدين الما يولد ما ما يوال عالم المالة بدا المالي المنابع المالي المنابع مة والدخواءة كالمداد، ما والمن والانطال المن وطوا من المرا وسرو المسادة والدالم المالا للاحسانات المدالالالا فالديكيل الاللاللال المايان جسانالا المار ويوريا عنالك بدرا لادرال ياد و المراسيلية فحرا المراملا حدوق من الاراك ومديان من الاراك ومديان من الاراك ないことがよっていいかといれないがには人人はところというかんないのでは、あれていいいの בונשביו בני בני בניני ביווים על לוויוו (עלוו וועל וואובוני) ווביויל רוש עביני ביווים לל לוויוו (על וואובוני) ווביייל רוש עביב

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