

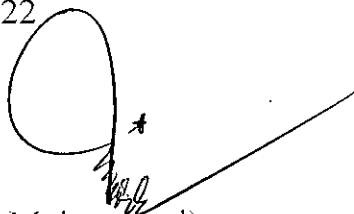
ORDER  
30.11.2022

Nemo for the appellant. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

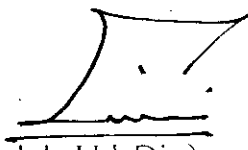
The appeal in hand was called on for hearing after various intervals, however none appeared on behalf of the appellant till the closing time, therefore, the appeal in hand stands dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

SCANNED  
KFST  
Peshawar

ANNOUNCED  
30.11.2022



(Mian Muhammad)  
Member (Executive)



(Salah-Ud-Din)  
Member (Judicial)

26.10.2022

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments before the D.B on 30.11.2022.

SCANNED  
KPSIT  
Peshawar



(Mian Muhammad)  
Member (E)



(Salah-ud-Din)  
Member (J)


2

09.06.2021

Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Former made a request for adjournment. Request is accorded. To come up for arguments on 23.12.2021 before D.B.

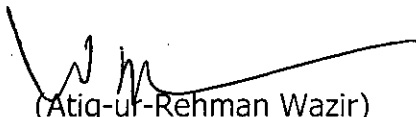
  
(Rozina Rehman)  
Member (J)

  
Chairman

23.12.2021

Counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Learned counsel for the appellant seeks adjournment for preparation. Request is accorded. Case to come up for arguments on 06.04..2022 before the D.B.

  
(Atiq-ur-Rehman Wazir)  
Member(E)

  
Chairman

06.04.2022

Clerk for the learned counsel present. Mr. Kabirullah Khattak Adl. AG present for respondents present.

Counsel are at strike. Therefore the case is adjourned to 12.07.2022 before D.B.



Chairman

12-7-2022

Due to Holidays of Eid Ul Azha  
the case is adjourned to 26-10-2022

Reader

17.11.2020

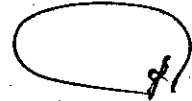
Counsel for appellant present.

Kabirullah Khattak learned Additional Advocate General for respondents present.

Former requests for adjournment. Request is acceded. To come up for arguments on 12.02.2021 before D.B.



(Atiq ur Rehman Wazir)  
Member (E)



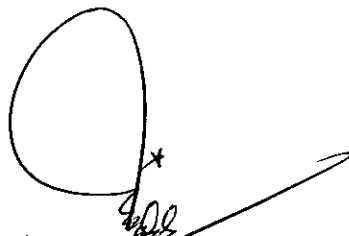
(Rozina Rehman)  
Member (J)

12.02.2021

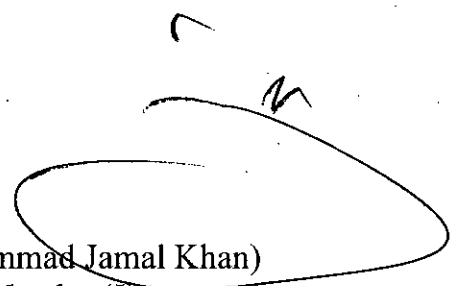
None for the appellant present. Adl: AG for respondents present.

Arguments could not be heard due to general strike of the Bar.

Adjourned to 05.05.2021 for arguments before D.B.



(Mian Muhammad)  
Member (E)



(Muhammad Jamal Khan)  
Member (J)

5.5.21

*Due to COVID-19, the case is adjourned to 6.9.2021 for the same.*



*Reader*

6.5 .2020

Due to COVID19, the case is adjourned to

17/7/2020 for the same as before.

Reader

17.07.2020

Nemo for the appellant. Addl. AG for the respondents present.

On previous date the matter was posted for hearing today through Reader note. Notices be issued to appellant/learned counsel for next date of hearing. Adjourned to 15.09.2020 for arguments before the D.B.

(Muhammad Jamal Khan)  
Member

Chairman

15.09.2020

Junior counsel for appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Former requests for adjournment as senior counsel is not available. Adjourned. To come up for arguments on 17.11.2020 before D.B.

(Atiq ur Rehman Wazir)  
Member (E)

(Rozina Rehman)  
Member (J)

17.01.2020

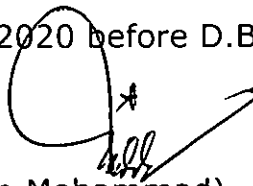
Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, instant appeal is adjourned to 05.03.2020 for further proceedings/arguments before D.B.

  
Member

  
Member

05.03.2020

Appellant in person and Mr. Kabirullah Khattak, Additional AG for the respondents present. Appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 06.05.2020 before D.B.

  
(Mian Mohammad)  
Member

  
(M. Amin Khan Kundi)  
Member

15.07.2019


Learned counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 27.09.2019 for arguments before D.B.

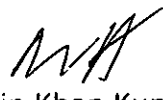
  
(HUSSAIN SHAH)  
MEMBER

  
(M. AMIN KHAN KUNDI)  
MEMBER

27.09.2019

Learned counsel for the appellant present. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 19.11.2019 before D.B

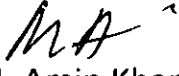
  
(Hussain Shah)  
Member

  
(M. Amin Khan Kundi)  
Member

12.11.2019

Learned counsel for the appellant present. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 17.01.2020 before D.B.

  
(Hussain Shah)  
Member

  
(M. Amin Khan Kundi)  
Member

19.12.2018

Learned counsel for the appellant present. No one present on behalf of respondent department. Notice be issued to the respondents with the direction to furnish written reply/comments. To come up for written reply/comments on 31.01.2019 before S.B.

  
Member

31.01.2019

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present and submitted written reply. The appeal is assigned to D.B-I for rejoinder and arguments for 29.04.2019.

  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

29.04.2019

Counsel for the appellant and Mr. Muhammad Riaz Paindakhel, Asstt. AG for the respondents present.

Learned counsel for the appellant submitted rejoinder to the reply of respondents which is placed on record. To come up for arguments before the D.B on 15.07.2019.

  
Member

  
Chairman



19.07.2018

Learned counsel for the appellant present.  
Preliminary arguments heard.

The appellant (Ex-Constable) has filed the present appeal against the order dated 29.02.2009 whereby he was discharged from service and against the order dated 30.05.2018 whereby his departmental appeal was rejected.

Points raised need consideration. The present appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 10.09.2018 before S.B.

Appellant Deposited  
Security & Process Fee

20/9/2018



Member

10.09.2018

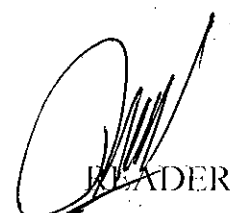
Neither appellant nor his counsel present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Written reply not submitted. The latter made a request for adjournment. Granted. Case to come up for written reply/comments on 01.11.2018 before S.B.



Chairman

01.11.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 19.12.2018.



CHAIRMAN

Form- A  
FORM OF ORDER SHEET

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

Case No. 806/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/06/2018	<p>The appeal of Mr. Jalal Hussain presented today by Uzma Syed Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR 20/6/2018</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19/7/18</u>.</p> <p style="text-align: right;"><i>[Signature]</i> MEMBER</p>
2-		

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 806/2018

Jalal Hussain

V/S

Police Deptt:

**INDEX**

S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	1-3
2.	Copy impugned order	-A-	.04
3.	Copy of departmental appeal	-B-	05
4.	copy of rejection order	-C-	06
5.	Vakalat Nama	-----	07

**APPELLANT**

THROUGH:

*uzma*  
**(UZMA SYED)**

*& Noman*  
**SYED NOMAN ALI BUKHARI**  
**(ADVOCATES, PESHAWAR)**

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 806 /2018

Jalal Hussain, EX- Constable, No.1539  
Kohat Region, Kohat.

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 1058

Dated 20-6-2018

.....(Appellant)

**VERSUS**

1. The Commandant Frontier Reserve Police, KP, Peshawar.
2. The Superintendent of Police, FRP, Kohat.

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER of RESPONDENT NO. 2 DATED 29.2.2009 WHEREBY, THE APPELLANT HAS BEEN DISMISSED FROM SERVICE AND AGAINST THE REJECTION ORDER DATED 30.05.2018 RECIVED BY APPELLANT ON 04.06.2018 WHEREBY, THE DEPARMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED FOR NO GOOD GROUNDS.

**PRAYER:**

Filed to-day  
Registrar  
20/6/2018

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDERs DATED 29.02.2009 AND 30.05.2018 RECIVED BY APPELLANT ON 04.06.2018 MAY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPOPRIATE THAT MAY ALSO BE AWARADED IN FAVOUR OF APPELLANT.

**RESPECTFULLY SHEWETH:**

**FACTS:**

Facts giving rise to the present service appeal are as under:

1. That the appellant was appointed as Constable in Police force in year 2007 and the appellant was performed his duties with entire satisfaction of his superiors.
2. That the appellant was not willfully absented from duty but absented due to some domestic problem and serious illness.
3. That, thereafter, the appellant was departmentally proceeded, without charge sheet, statement of allegation, regular inquiry and even without showcause notice, the impugned order dated 29.02.2009 was passed against the appellant whereby the appellant was dismissed from service with retrospective effect which was also not communicated to the appellant. The appellant been aggrieved from the impugned dismissal order preferred departmental appeal . The departmental appeal of the appellant was rejected vide order dated 30.05.2018 received by appellant on 04.06.2018 for no good ground. **(Copy of impugned order, departmental appeal and rejection order is attached as Annexure-A, B & C).**
4. That now the appellant come to this august Tribunal on the following grounds amongst others.

**GROUND:**

- A) That the impugned orders dated 29.02.2009 and 30.05.2018 received by the appellant on 04.06.2018 are against the law, facts, norms of justice and void-ab-initio as has been passed with retrospective effect and material on record, therefore not tenable and liable to be set aside.
- B) That the impugned order was retrospective order which was void in the eye of law and according to Superiors Court Judgment reported as 2002 SCMR, 1129 and 2006 PLC 221. And no limitation run against the void order.
- C) That there is no order in black and white form to dispense with the regular inquiry which is violation of law and rules and without charge sheet, statement of allegation and proper inquiry the appellant was dismissed from the service vide order dated 29.02.2009 which is never communicated to the appellant, without given personal hearing which is necessary and mandatory in law

and rules before imposing major penalty. So the whole procedure conducted has nullity in the eye of law. So the impugned order is liable to be set aside.

- D) That the appellant has been condemned unheard and has not been treated according to law and rules.
- E) That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on this score alone.
- F) That the abscent of the appellant was not intentially but due to some domestic problem and serious illness. So the penalty imposed upon the appellant was so harshed.
- G) That the appellant's guilt has not been proved beyond the shadow of doubt and the appellant has been punished on the basis of conjecture and surmises.
- H) That no chance of personal hearing was provided to the appellant and as such the appellant has been condemned unheard throughout.
- I) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

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

جلال حسین  
**APPELLANT**  
Jalal Hussain

THROUGH:

uzma  
**(UZMA SYED)**

سید نoman  
**(SYED NOMAN ALI BUKHARI)**  
ADVOCATES, PESHAWAR

Annex (A) No 227  
Date 3-3-08 (4)

ORDER.


R/Const Jalal Hussain 1539 of this District undergoing Recruit course at police training Collage has absented himself with out any leave or prior permission with effect from 5-12-08 till to-date


He was returned to the parent District as unqualified vide police training college Hangu Office OB No. 765 Dated 5-12-08

In light of the above facts he is discharged from service with effect from the date of his absence, 5-12-08 under special powers ordinance 2000.

OB NO. 126

Dated 25/2/09

  
Superintendent of Police, FRP  
Kohat.

  
ATTEST

محترم جناب آئی اے ایم ایف افسر پشاور

درخواست نمبر بجالی

جناب عالی

گزارش کی جاتی ہے کہ سال 2007 FRP لوئیں میں بطور کنٹری  
 جسٹیسیا۔ ٹریننگ کے دوران سائل بیمار چس گیا۔ سائل نے  
 اپنے سنیر سے اجازت لے کر چلے گیا سائل کو اپنی بیماری  
 اور پھر گھر کی کچھ دسینوں کی وجہ سے محکم سے غیر حاضر کیا  
 لیکن سائل نے اپنے افسر کو اطلاع کی تھی۔ جب سائل محکم  
 کو جواب دہ کرنے کے لئے گیا۔ تو پتا چلا کہ سائل کو 2009 میں  
 ڈیوٹی سے ڈسچارج کیا گیا تھا۔ آپ صاحبان سے گزارش  
 ہے کہ سائل ایک بہت عزیز گھرانے سے تعلق رکھتا ہے گھر  
 میں سائل کے علاوہ کمانے والا کوئی نہیں لہذا آپ صاحبان  
 میری طرف سے اس سائل کو بحال کرائیں آپ کی بڑی فریاد ہو گی  
 کہیں کوئی توجہ ہوگی

اپنا تعارف جلال حسین FRP 1539

Handwritten signature

03355023353

Date 2018-4-2

ATTESTED



Amended

(B)

RRP  
KAT

**ORDER**

This order will dispose of the departmental appeal preferred by Ex-constable Jalal Hussain No. 1539 of FRP Kohat Range against the order of discharged from service passed by SP FRP Kohat Range, Kohat vide OB No. 126, dated 23.02.2009. The applicant was proceeded against on the allegations that he was detailed for Basic Recruit Course held at PTC Hangu and absented himself from duty with effect from 20.11.2008 till the date of discharged from service i.e 23.02.2009 for total period of 03 months and 02 days, without any leave/permission of the competent authority. He was returned as unqualified vide Commandant PTC Hangu Signal No. 4524/GC, dated 06.12.2008 on his own request.

Proper departmental enquiry was initiated against him. He was issued Show-Cause Notice of his willful absence from his official duty, but he failed to submit his reply. After fulfillment the due codal formalities he was awarded major punishment of discharged from service vide OB No. 126/FRP, dated 23.02.2009.

Feeling aggrieved against the impugned order of SP FRP Kohat Range, Kohat, the applicant preferred the instant appeal.

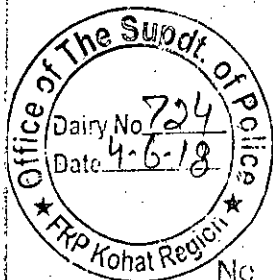
From perusal of available record and in view the facts mentioned above the applicant has been found to be an irresponsible person, disregarded of discipline of the force.

Based on the findings narrated above, I, Tahir Ayub Khan PSP Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless and badly time barred.

Order Announced.

*[Signature]*  
Commandant

Frontier Reserve Police,  
Khyber Pakhtunkhwa, Peshawar.



No. 6880-B1 /EC, dated Peshawar the 30 / 5 /2018.

Copy of above is forwarded for information and necessary action to the:-

1. SP FRP Kohat Range, Kohat. His service record alongwith D file sent herewith.
2. Ex- constalbe Jalal Hussain No. 1539 S/O Zawar Jan, Village Ibrahim Zai, Police Station Hangu, District Hangu.

SRC/OHC

*for info and Bellant be also informed.*

Superintendent of Police,  
FRP Kohat Range,  
Kohat.

*one more Roll received on today 4/6/18*

*[Signature]*  
4/6/18

*aplo  
to [unclear] 4/6/18*

*[Signature]*

بعدالت

Service Tribunal, Peshawar

2 مخائب  
بنام

مورخہ  
مقدمہ  
دعویٰ  
جرم

باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام Peshawar کیلئے علیٰ علی

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالتہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور صولی چیک در و پیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق

زر میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی

نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور

کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار

ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ

پر واختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی

مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 20 6 2018

العبد گواہ العبد

بمقام Peshawar کے لئے منظور ہے۔

Accepte

1/1/18

**BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR.**

**Service Appeal No. 806/2018**

Jalal Hussain

VS

Police Deptt:

.....  
**REJOINDER ON BEHALF OF APPELLANT**  
.....

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

(1-6) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

**FACTS:**

- 1 First portion of the appeal is admitted correct by the respondent deptt: while remaining para-1 of the reply is incorrect and para-1 of the appeal is correct.
- 2 Incorrect. While para-2 of the appeal is correct as mentioned in the main appeal of the appellant. Further it is added that the deptt: admitted the illness of the appellant as correct. Further it is added that according to superior court judgment if the employee was absent on the basis of illness even without prior permission the major penalty cannot be imposed.

- 3 Incorrect. While para-3 of the appeal is correct as mentioned in the main appeal of the appellant.
- 4 No comments.

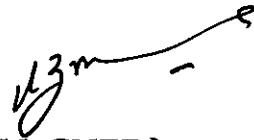
**GROUND:**

- A) Incorrect. The orders of the respondents are against the law, rules and norms of justice therefore not tenable and liable to be set aside.
- B) Incorrect. While para-B of the appeal is correct as mentioned in the main appeal of the appellant.
- C) Incorrect. Incorrect. While para-C of the appeal is correct as mentioned in the main appeal of the appellant.
- D) Incorrect. Incorrect. While para-D of the appeal is correct as mentioned in the main appeal of the appellant.
- E) Incorrect. Incorrect. While para-E of the appeal is correct as mentioned in the main appeal of the appellant.
- F) Incorrect. Incorrect. While para-F of the appeal is correct as mentioned in the main appeal of the appellant.
- G) Incorrect. Incorrect. While para-G of the appeal is correct as mentioned in the main appeal of the appellant.
- H) Incorrect. Incorrect. While para-H of the appeal is correct as mentioned in the main appeal of the appellant
- I) Legal.

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

  
**APPELLANT**


Through:

  
**(UZMA SYED)**  
&  
**SYED NOMAN ALI BUKHARI**  
ADVOCATE HIGH COURT.

**AFFIDAVIT**

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.

**ATTESTED**  
IRFAN ULLAH ADVOCATE  
NOTARY PUBLIC

  
29/1/18

  
DEPONENT

**BEFORE THE SERVICE TRIBUNAL PESHAWAR.**

SERVICE APPEAL NO. 806/2018

Ex Constable Jalal Hussain .....Petitioner.

**VERSUS**

1. Addl: IGP/Commandant FRP Khyber  
Pakhtunkhwa Peshawar & Others.....Respondents.

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES
1.	Para-wise Comments		02
2.	Show Cause Notice		01
3.			
4.			
<b>Total</b>			03

  
**RESPONDENTS**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 806/2018.

Jalal Hussian Ex-Recruit Constable No. 1539/Kohat Range .....Appellant.

**VERSUS**

1. Commandant, Frontier Reserve Police,  
Khyber Pakhtunkhwa, Peshawar.
2. Superintendent of Police.  
FRP Kohat Range, Kohat.....Respondents.

**PRELIMINARY OBJECTIONS**

1. That the appeal is badly time barred.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has no cause of action to file the instant appeal.
4. That the appellant has not come to this Honorable Tribunal with clean hands.
5. That the appellant is estopped due to his own conduct to file the instant Service Appeal.
6. That the appellant is trying to conceal material facts from this Honorable Tribunal.

**WRITTEN REPLY ON BEHALF OF RESPONDENTS.**

**RESPECTED SHEWETH.**

**FACTS:-**

1. Correct. He was enlisted as constable on 30.09.2007 vide DPO Office Hangu order book No. 372, dated 20.10.2007. The remaining para is not correct. Had he performed his duty efficiently and to the satisfaction of his seniors, he would not have been discharged from service.
2. Incorrect and denied. Had he been sick, he would have informed the concerned authorities and would have applied for leave through application rather to absent himself for the period of 92 days without proper permission of the competent authority.
3. Incorrect and denied. Proper departmental proceedings were initiated against him by issuing Show Cause Notice to which he submitted reply which was not satisfactory. His order of discharge was communicated to him while his departmental appeal was rejected by respondent No.1 for being meritless and badly time barred. (copy of show cause notice is attached as annex A).
4. Not concerned.


**Grounds:-**


- A. Incorrect and denied. Both the orders dated 29.02.2009 and 30.05.2018 were passed according with law and rules.
- B. The Para is legal. Hence, no comments.

- C. Incorrect and denied. The appellant was dealt in accordance with law and rules and he was given full chance to defend himself.
- D. Incorrect and denied. The appellant was dealt in accordance with law and *rules.*
- E. Incorrect and denied. Appellant was discharged from service under special power ordinance 2000.
- F. Incorrect and denied. Appellant has absented himself from duty intentionally.
- G. Incorrect and denied. The appellant was found guilty of the charges leveled against him therefore, he was discharged form service under removal from service (special powers) ordinance 2000 vide OB No. 126, dated 23.02.2009.
- H. Incorrect and denied. The appellant was dealt with in accordance with law and rules and he was given full chance to defend himself.
- I. That any other points, if raised, shall be shared during arguments. His appeal is badly time barred.

PRAYERS:-

It is therefore, most humbly prayed that in the light of aforesaid facts/submission the service appeal may kindly be dismissed with cost.

  
Commandant, FRP,  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No.1)

  
Superintendent of Police FRP  
Kohat Range, Kohat  
(Respondent No.2)



SHOW CAUSE NOTICE

No. 1539

WHEREAS You Const. Jalal Hussain While posted at  
District Kohat absented himself  
w.e.f. 01.08.2008 till now. This  
clearly indicated you lack of interest in the discharge of official duty.

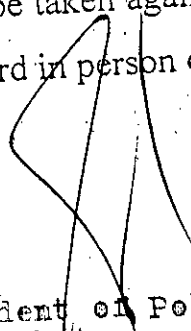
YOUR above act amounts to grave misconduct under  
the N.W.F.P Removal from service (Special Power) Ordinance 2000.

NOW therefore, I Gul Ma Khan, SP/FRP, Kohat in  
exercise of the power vested upon me under the aforesaid Rules,  
hereby call upon you Constable Jalal Hussain to Show Cause  
as to why departmental action fro Major Punishment be not taken  
against you under the aforesaid Rules.

Yours reply to the Show Cause Notice must reach to  
the office of the undersigned within seven days of the receipt of this  
show cause notice. In case of your reply is not received within the  
stipulated period, it shall be presumed that you have no defence to  
offer and ex-parte departmental action will be taken against you. Also  
state in writing whether you desire to be heard in person or otherwise.

Superintendent of Police,  
FRP, Kohat.

No. 28/PA,  
dt. 28/10/2008.

  
29-10-08

28/10/08