

24.09.2020

Appellant alongwith counsel present.

Learned counsel states that after submission of instant appeal on 15.06.2020 the departmental appellate authority decided the lis of appellant on 25.06.2020. In order to impugn the decision of departmental appellate authority another Service Appeal (No. 7949/2020) was preferred by the appellant. In order to avoid multiplicity of proceedings the withdrawal of instant appeal is requested.

Disposed of as such.

  
Chairman

ANNOUNCED


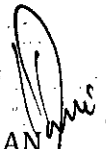
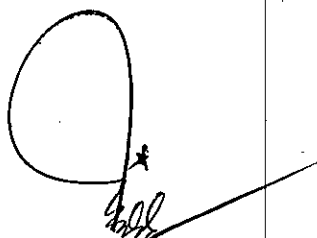
24.09.2020

Form- A

FORM OF ORDER SHEET

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

Case No.- 5765 /2020

1S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/06/2020	<p>The appeal of Mr. Majid Khan presented today by Mr. Javed Iqbal Gulbella Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16/07/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	16.07.2020	<p>Junior to counsel for the appellant present.</p> <p>Former requests for adjournment as senior counsel is indisposed today.</p> <p>Adjourned to 24.09.2020 before S.B.</p> <p style="text-align: right;"> (Mian Muhammad) Member(E)</p>

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

In Re S.A. 5765 /2020

Majid Khan

**VERSUS**

I.G.P Khyber Pakhtunkhwa & Other

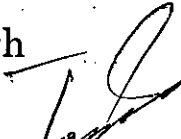
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Dated : 12/06/2020

  
Appellant

Through

  
**JAVED IQBAL GULBELA**  
Advocate, High Court,  
Peshawar.

Off Add: 9-10A Al-Nimrah Centre, Govt College Chowk Peshawar

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

In Re S.A. 5765 /2020

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 5058

Dated 15/6/2020

Majid Khan S/o Laiq Badshah R/o Bhora Ghari,  
Kohat.

-----*(Appellant)*

**VERSUS**

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
2. District Police Officer, Kohat.

-----*(Respondents)*.

**APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICES TRIBUNAL  
ACT -1974 AGAINST THE IMPUGNED  
ORDER NO: 58031-34/PA DATED  
23/12/2019 OF THE OFFICE OF THE  
DISTRICT POLICE OFFICER, KOHAT,  
WHEREBY THE APPELLANT WAS  
DISMISSED FROM HIS SERVICE IN A  
CLASSICAL, CURSORY AND  
WHIMSICAL MANNER.**

Filed to-day

Registrar

15/6/2020.

**Respectfully Sheweth;**

1. That the Appellant was inducted into service as Constable in Police Department of Khyber Pakhtunkhwa back in the year 2008.
2. That thereafter, the Appellant took charge and with his most sincere and pragmatic way,

(2)

performed his duties and never left any stone unturned in performance of his duties with utmost zest & devotion.

3. That it was in this backdrop of the year 2019, wherein the Appellant was malafidely & falsely charged in a Criminal case vide FIR No: 816, dated 05/11/2019, charged U/S 302, 34 PPC, PS Billitang, Kohat, due to which the Appellant was not in position to perform his duties, due to life threat & fear of enmity. Thereafter, the Appellant surrendered before the court of law for his Pre-Arrest Bail, which was turned down & the Appellant was sent to Judicial Lock-up. **(Copy of the FIR is annexed as Annexure "A")**
4. That the Appellant approached the court of Learned ASJ-I Kohat for his Post-Arrest Bail which was duly accepted on 07/01/2020 & the Appellant was released on bail. **(Copy of Post Arrest Bail Order dated 07/01/2020 has been annexed herewith as Annexure "B")**
5. That in the meanwhile the Appellant has dismissed from service, without any due process of law & upon this sole ground of being booked in a criminal case vide the impugned office order No: 58031-34 dated 23/12/2019 of the office of D.P.O Kohat. **(Copy**

(3)

of the impugned dismissal order is annexed as Annexure "C")

6. That feeling aggrieved from impugned dismissal from service order, the Appellant preferred a Departmental Appeal dated 15/01/2020 by the same has not been decided inspite lapse of the statutory period. (Copy of Departmental Appeal dated 15/01/2020 is annexed herewith as Annexure "D")
7. That thereafter, unfortunately the pandemic Covid-19 spread in the country, which halted the Appellant to approach this Hon'ble Tribunal as well.
8. That feeling aggrieved from the impugned dismissal order, the appellant approaches this Hon'ble Tribunal for his reinstatement in the service with all back benefits upon the following grounds:-

### **Grounds:**

- A. That the Appellant is naturally born bonafide citizen of the Islamic Republic of Pakistan and is fully and equally, on equality basis, entitled to all basic and fundamental rights as enshrined in the fundamental law of the land, interpreted, guaranteed and enforced by the laws of the land and discrimination along

with unfettered exercise of discriminatory powers by an authority or office is always been deplored, deprecated and depreciated by Superior Courts of the land.

- B.** That the dismissal order of the Respondent is unwarranted, against the fact and law on the subject is not sustainable at all.
- C.** That the Appellant was malafidely and falsely charged in a baseless and groundless criminal case and due to fear of enmity and order to save his life, which is a natural act in such like circumstances and the same has been repeatedly held by the Superior Law of the land in plethora of his judgment and his absence from duty in such like circumstances in no ground for his dismissal from service.
- D.** That the act of the respondents in so called circumstances is purely baseless, unlawful, void ab-initio, coram-non-judice and is unwarranted to the core.
- E.** That the Supreme Law of the land has held many times that if a criminal case is registered against an employee, being a Civil Servant, he shall be suspended accordingly rather than being dismissed.

(5)

F. That no proper Departmental inquiry against the appellant was ever conducted nor was given an opportunity to be heard, to defend, clear his position and thus depriving him of his right to be heard, which is against the law of natural justice.

G. That the impugned office order No. 58031-34/PA District Police Officer Kohat dated 23/12/2019 clearly proves the malafide and mal-intention as well as mal-practices of the respondents which is not sustainable in eyes of law.

H. That the impugned dismissal order is unlawful, illegal and liable to be cancelled because the Respondent utterly violated the service law, rules, regulations and policy of the Government for Civil Servants while passing the impugned removal order.

I. That the impugned dismissal order is the violation of the fundamental rights of the Appellant, which is guaranteed and protected by the Constitution of Islamic Republic of Pakistan 1973.

J. That from every angle the impugned dismissal order is null and void and not sustainable hence is liable to be set aside.



(6)

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

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the impugned order No: 58031-34/PA District Police Officer Kohat dated 23/12/2019 be set aside and by doing so, the Appellant be reinstated into service with all back benefits.

Any other relief not specifically asked for may graciously be extended in favor of the appellant, in the circumstances of the case.

Dated: 11/06/2020

  
Petitioner

Through


  
Javed Iqbal Gulbela

Israr Ahmad

  
Saghir Iqbal Gulbela

Ahsan Sardar

&

Tahir Khan   
Advocates, High Court  
Peshawar

**NOTE:-**

No such like service appeal for the same appellant upon the same subject matter has earlier been filed by me before this Hon'ble Tribunal.

  
Advocate.

7

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

OIn Re S.A \_\_\_\_\_/2020

Majid Khan

**VERSUS**

Inspector General of Police and Others

**AFFIDAVIT**

I, **Majid Khan S/o Laiq Badsha R/o Bhora Garhi, Tehsil & district Kohat**, do hereby solemnly affirm and declare that all the contents of the accompanied appeal is true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

*M*

**DEPONENT**

**CNIC#14301-5115847-3**

Identified By :

*Javed Gulbela*  
Javed Gulbela  
Advocate High Court  
Peshawar.



*Javed Gulbela*  
12-6-2020

(7-a)

**BEFORE THE HON'BLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA, PESHAWAR.**

In Re. C.M No. \_\_\_\_\_/2020

In S.A No. \_\_\_\_\_/2020

***Majid Khan***

***VERSUS***

***I.G.P Khyber Pakhtunkhwa & Others***

**APPLICATION FOR CONDONATION OF DELAY**

**Respectfully Sheweth,**

1. That the petitioner is filing the accompanying appeal the contents of which may graciously be considered as integral part of the instant petition.
2. That the delay in approaching this Tribunal was due to locked down and COVID-19 pandemic country wide, which was not deliberate at all but accidental.
3. That law also favours adjudication on merits and technicalities of any sort must always be ignored while reaching a just and fair disposal of any les.

SERVICES TRIBUNAL PESHAWAR  
BEFORE THE HONBLE KHYBER PAKHTUNKHWA

In Re S.A. \_\_\_\_\_ 12020

Majid Khan


VERSUS

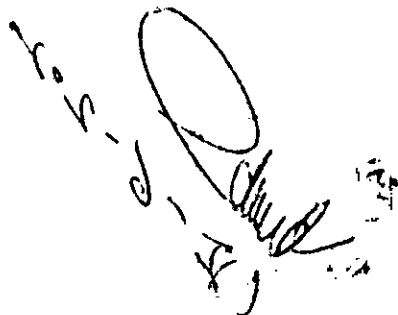
I.G.P. Khyber Pakhtunkhwa and others

AFFIDAVIT

I, Majid Khan S/o Laid Badshah R/o Bhora Ghari Kohat do hereby solemnly affirm and declare that all the contents of the accompanied application are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

  
DEPONENT

Identified By:  
  
Iqbal Gul  
Advocate High Court  
Peshawar.

  
Iqbal Gul  
Advocate High Court  
Peshawar.

(8)

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

In Re S.A \_\_\_\_\_/2020

Majid Khan

**VERSUS**

I.G.P Khyber Pakhtunkhwa & Other

**ADDRESSES OF PARTIES**

**APPELLANT.**

Majid Khan S/o Laiq Badshah R/o Bhora Ghari,  
Kohat.


**RESPONDENTS:**

1. Inspector General of Police, Khyber  
Pakhtunkhwa, Peshawar.
2. District Police Officer, Kohat.

**Dated : 11/06/2020**

  
**Appellant**

Through

  
**JAVED IQBAL GULBELA**  
Advocate, High Court,  
Peshawar.



10

IN THE COURT OF  
ABID ZAMAN

Addr: Sessions Judge-I, Kohat

BA No.1/2020  
Majid..Vs..State

Am  
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**ORDER:04**

7.1.2020

Pattern of this order is as per MUHAMMAD SHAKEEL versus THE STATE and others case (PLD 2014 Supreme Court 458)

Mr.Fawad Hussain Advocate for accused/petitioner present.  
Mr.Ibrar Alam Advocate for complainant present. APP Mr.Amjid Ali for the State present.

Arguments heard and record perused.

Accused/petitioner Majid s/o Laiq Shah r/o Bhora Gari Kohat seeks his release on bail in case F.I.R No.816 dated 5.11.2019 U/s 302/34 PPC of Police Station Belitung, Kohat.

Gist of the FIR is that the accused/petitioner is involved in the murder of one Inayatullah Khan.

No doubt, the case comes within the prohibitory clause of section 497 Cr.PC. However, tentative assessment of the record shows that:

1. Effective role of firing was attributed to co-accused Hassan alias Chintu.
2. Common intention of accused/petitioner with co-accused would be determined at the stage of trial.
3. Investigation to the extent of accused/petitioner is complete and accused/petitioner is no more required for further investigation.
4. The accused/petitioner has not confessed guilt.
5. No recovery or discovery was effected on the pointation of accused/petitioner.
6. There is no absconion on part of accused/petitioner.

Thus, in these circumstances, case against the accused/petitioner is one of further inquiry. Hence, the accused/petitioner is admitted to bail subject to furnishing bail bonds in the sum of Rs.80,000/- (eighty thousand) with two sureties each, in the like amount, to the satisfaction of this court. Record be returned to quarter concerned while this file be consigned to the record room after its proper compilation and completion.

**Announced**

7.1.2020

(ABID ZAMAN)  
AD & SJ-I, Kohat

JAVED IQBAL Gul Bela  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

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**OFFICE OF THE  
DISTRICT POLICE OFFICER,  
KOHAT**

Tel: 0922-9260116 Fax 9260125

No \_\_\_\_\_ /PA dated Kohat the \_\_\_\_/\_\_\_\_/2019

**ORDER**

This order is passed on the departmental enquiry against Constable Majid No. 372 under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Brief facts of the case are that while he posted at Police Lines Kohat was charged in case FIR No. 816 dated 05.11.2019 u/s 302, 34 PPC PS Billitang.

He was served with charge sheet & statement of allegations, SP Operations Kohat was appointed as enquiry officer to proceed against him departmentally. Enquiry officer submitted his finding report and stated that the accused official was present on spot during the incident and after the incident, all the (03) accused ran away from the spot. Statement of O.II was perused and placed on file. During the course of enquiry he was given complete legitimate opportunity to defend himself according to law. Thus he was held guilty of violation and committed gross professional misconduct. The charge leveled against the accused official has been established beyond any shadow of doubt.

Therefore, in exercise of powers conferred upon me under the ibid rules I, Capt. @ Mansoor Aman, District Police Officer, Kohat impose a major punishment of **dismissal** from service with immediate effect. The absence period is treated as unauthorized leave without pay on the principle of "now work, no wage". Kit etc issued be collected.

DISTRICT POLICE OFFICER,  
KOHAT 23/12

OB No. 1673  
Dated 23-12-2019

No 58031-34 /PA dated Kohat the 23-12 2019.

CC.-

1. Reader/Pay officer/SRC/OHC for necessary action.
2. R.I/L.O for clearance report
3. Accused official.

DISTRICT POLICE OFFICER,  
KOHAT 23/12

JAVED IQBAL, G...  
Daudzai Law Champ  
Advocate High Court  
Mob 0345-00 55

26-12-19  
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**BEFORE THE DEPUTY INSPECTOR GENERAL OF POLICE KOHAT**  
**REGION KOHAT**

**Subject: Appeal under Rule 11 of the Police Rules 1975**  
**(Ammended 2014) against order of the DPO Kohat**  
**Dated 23-12-2019 wherein the appellant was**  
**dismissed from service with immediate effect.**

Respected Sir,

*With great respect the appellant may be allowed to submit the following for your kind and sympathetic consideration.*

**Facts of the case.**

1. *That the appellant was enrolled as constable in the year 2008.*
2. *That the appellant after qualifying basic courses/training took keen interest in the official work and succeeded to arrest terrorist and recovered huge quantity of chars, arms and ammunition.*
3. *That the appellant due to his hard work earned confidence of his seniors and for his good work was awarded a number of cash rewards besides commendation certificates.*
4. *That the appellant while posted in the police lines Kohat was falsely charged vide case FIR No. 515 dated 11-2-2019 u/s 302, 34 PPC P.S Billitang Kohat.*
5. *That the appellant immediately after the registration of case, surrendered before the court. BBA of the appellant was rejected and the appellant was sent to the judicial lock up.*
6. *That there after the appellant applied Bail after arrest which was accepted on 7-1-2020 by the learned Additional Session Judge I Kohat and the appellant was released on bail. (Copy of the order is enclosed).*
7. *That the police department also opened departmental enquiry when the appellant was in the district jail Kohat.*
8. *That the departmental enquiry was completed at the back of the appellant and the appellant was dismissed from service with immediate effect. (Copy of order is enclosed).*

**JAVED IQBAL** Gul Beta  
Daudzai Law Chamber  
Advocate High Court Peshawar  
Mob: 9345-949555

9. That the punishment order has aggrieved the appellant, therefore, following are grounds of appeal among other-

**Grounds of Appeal**

- A. That the impugned order of punishment is not in accordance with law, rules and evidence on record.
- B. That the appellant while in the district Jail Kohat, departmental proceedings were initiated.
- C. That the appellant was not given any opportunity to defend himself during the enquiry proceedings.
- D. That the appellant was denied the right of cross examination of the witnesses who recorded statement against the appellant.
- E. That enquiry against the appellant was conducted one sided and unilaterally.
- F. That the appellant was also not served with the Final Show Cause Notice nor he was produced before the DPO Kohat for personal hearing.
- G. That the fundamental rules of justice were not kept in sight during the enquiry and as well as at the time of awarding punishment to the appellant.
- H. That under Art.10 A of the constitution of Pakistan, the appellant has a fundamental rights of fair, impartial and transparent enquiry /trial but unfortunately the competent authority ignored such an important aspect and thus the entire enquiry proceedings have become nul and void.
- I. That the bail order regarding the appellant also speaks of his innocence because the learned court has held that no effective role was attributed to the appellant and that the question of common intention will be determined at the trial stage. (Copy of the bail order is enclosed).
- J. That the Hon'ble Peshawar High Court Peshawar vide its judgment dated 14-2-2018, has held that if an employee is charged for an offence, the department instead of dismissal from service, keep him under suspension and after decision of trial, his departmental enquiry be disposed of in accordance with the principles of law and justice. The appellant produced the judgment to the DPO Kohat but the order of punishment is silent about the judgment of the Hon'ble Peshawar High Court.
- K. That the appellant has been falsely charged in the case. There is no direct or indirect evidence against the appellant. The appellant is merely charged at the instance of his opponents.


- L. That the appellant is absolutely innocent because at the time of occurrence the appellant was present in his house. The appellant has been erroneously shown present at the place of occurrence.
- M. That the appellant also assure your good self on oath that he is absolutely innocent and he is falsely charged in the case. Your good self may verify facts from independent sources. They will also certify innocence of the appellant.
- N. That the impugned order of punishment is also not in accordance with law /rules on the score that in addition to the punishment of dismissal the appellant has been awarded another punishment i.e the absence period is treated as unauthorized leave without pay. Under the rules the competent authority could award only one major punishment but the learned competent authority in violation of the rules has awarded additional punishment and thus the punishment order has become legally defective and of no legal effect.
- O. That the punishment order does not satisfy the ends of law and justice, thus it is not sustainable in the eyes of law.
- P. If deemed proper the appellant may be heard in person.

Prayer:-

*It is therefore, humbly requested that the impugned punishment order dated 23-12-2019 being not in accordance with law, justice and evidence on record may kindly be set aside and the appellant may be re-instated in service with all back benefits and privileges. The appellant will pray for your long life and prosperity.*

Dated 15-01-2020

Yours Obediently

Majid Khan   
Ex Constable No.372  
R/O Bhora Garhi Tehsil & District Kohat  
Cell No. 0334-8313290

**JAVED IQBAL** Gul Bel:  
Daudza Law Chamber  
Advocate High Court Peshawar  
Mob: 0345-9405501

## وکالت نامہ

بعدالت: صاحب سررسٹریٹس لیسٹ  
 صاحب خان بنام صدرت روز  
 منجانب اسٹیٹ دعویٰ سررسٹریٹس (SA)  
 تاریخ 20-6-12

باعث تحریر آنکہ مقدمہ مندرجہ بالا عنوان اپنی طرف سے واسطے پیروی و جوابدہی بمقام لے۔۔۔۔۔ کیلئے جاویداقبال گل بیلہ ایڈووکیٹ ہائی کورٹ کو بدین شرط وکیل مقرر کیا ہے۔ کہ میں ہر پیشی کا خود یا بزرگیہ مختار خاص رو بروعدالت حاضر ہوتا ہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا، اگر پیشی پر من مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کی کسی اور جگہ یا پکھری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام پکھری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کوکل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل و گرانہ ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کے روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپروٹاشی و راضی نامہ فیصلہ برخلاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختار نہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے دوسرے وکیل یا پیرسٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کے ہر امر وہی اور ویسے ہی اختیارات حاصل ہوں گے جیسے کے صاحب موصوف کو حاصل ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ اور صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا کہ سند ہے۔ مورخہ 20-6-12

صاحب خان و لہذا لائق باسما

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Accepted

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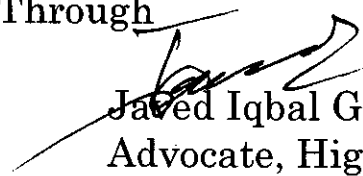
(7b)

4. That for proper disposal of the accompanying case on its merits, the condonation of delay is indispensable.
  
5. That not only the petitioner has got a prima facie case and having balance of convenience in his favour, but would suffer irreparable loss, if the instant petition is not allowed.

*It is, therefore, most humbly prayed that on acceptance of the instant petition, the delay if any occurred in filing the accompanying appeal, may graciously be condoned and the accompanying appeal may very graciously be decided on its merits.*

  
Petitioner/Appellant

Through

  
Javed Iqbal Gulbela  
Advocate, High Court  
Peshawar.

7-c

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

In Re S.A \_\_\_\_\_/2020

Majid Khan

**VERSUS**

I.G.P Khyber Pakhtunkhwa and others

**AFFIDAVIT**

I, **Majid Khan S/o Laiq Badshah R/o Bhora Ghari Kohat**, do hereby solemnly affirm and declare that all the contents of the accompanied application are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

*M*  
**DEPONENT**

Identified By:

*Javed Iqbal Gulbela*  
Javed Iqbal Gulbela  
Advocate High Court  
Peshawar.

