

BEFORE KPK SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1227 /2019

Abdul Qadir

VS

Police Deptt.

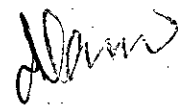
**APPLICATION FOR AMENDING THE
INSTANT APPEAL DUE TO REJECTION
ORDER ORDER DATED 22-08-2019 PASSED
DURING PENDENCY OF APPEAL**

Respectfully Sheweth,

Applicant humbly submitted as under:

1. That captioned case is pending for adjudication before this Hon'ble Tribunal and fixed for hearing on 30th August, 2019.
2. That applicant filed departmental appeal against impugned order dated 13.05.2019 and after the lapse of statutory period of 90 day the applicant filed service appeal before this Hon'ble Service Tribunal.
3. That the rejection order dated 22.08.2019 was passed during the pendency of appeal before this Hon'ble Service Tribunal which requires amendment in the instant appeal for impugning the same. **(Copy of rejection order attached as annexure-A).**

It is, therefore, most humbly prayed that applicant may kindly be allowed to amend the instant appeal for challenging the rejection order dated 22.08.2019.



APPLICANT

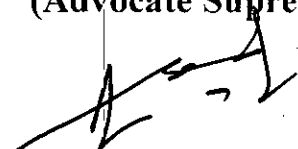
THROUGH



M. ASIF YOUSAFZAI
(Advocate Supreme Court)



TAIMUR ALI KHAN
(Advocate High Court)



ASAD MAHMOOD
(Advocate High Court)

AFFIDAVIT

It is solemnly affirm and declare that the contents of the instant application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT

ATTESTED



30-8-2019



OFFICE OF THE
SENIOR SUPERINTENDENT POLICE
COORDINATION PESHAWAR

Phone No. 091-9213757
Fax No. 091-9212597

ORDER.

This order will dispose of the departmental appeal preferred by Ex-SI Abdul Qadir No.555/P against the order of SSP/Coordination Peshawar passed in the denovo departmental enquiry initiated on the direction of Honorable Services Tribunal. The SSP/Coordination Peshawar vide order No.1620, dated 13-05-2019 upheld the earlier major punishment of Dismissal from Service awarded to him SSP/Operations Peshawar.

2- The allegations levelled against him were that he while posted as SHO PS Badaber, on 09-06-2011 a raid was conducted on his room and a huge quantity of arms/ammunition, narcotics and other miscellenious items/articles mentioned in the charge sheet were recovered from his room hidden by him without maintaining proper record. Besides 12 persons were also kept in illegal confinement by him for some ulterior motives and did not show their arrest on record.

3- The Enquiry officer after conducting Denovo Departmental Enquiry recommended that the charges leveled against him stand proved and found him guilty of gross misconduct. The enquiry officer provided him full opportunity of cross questions during the course of enquiry. He was served with Final Show Cause Notice to which he submitted his written reply, which was examined and found unsatisfactory, hence the competent authority upheld the earlier order of major penalty of dismissal from service awarded by SSP/Opreations.

4- He was heard in person in O.R and relevant record was perused along with his explanation. During personal hearing the appellant failed to forward any plausible explanation in self defence. Keeping in view the material available on file, the departmental appeal for reinstatement in service is hereby rejected.

(MUHAMMAD KARIM KHAN)PSP
CAPITAL CITY POLICE OFFICER
PESHAWAR.

No. 1133401PA dated Peshawar the 22/08/2019.

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

1. SSsP/Operations and Coordination Peshawar.
2. BO/OS/EC-I/EC-II/ CRC.
3. Official Concern