


FORM OF ORDER SHEET

Court of _____

Appeal No. 1132/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/05/2023	<p>The appeal of Mr. Mohsin presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before touring Single Bench at Peshawar on _____</p> <p>By the order of Chairman  For REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 1132 /2023

MOHSIN

V/S

POLICE DEPTT:

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APPELLANT

Through:



NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

-1-

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

APPEAL NO. 1132 /2023

Mr. Mohsin, Ex-Constable No: 1249,
DFC PS Sardheri, Charsadda.

..... **APPELLANT**

VERSUS

- 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- Regional Police Officer, Mardan Region at Mardan.
- 3- District Police Officer, District Charsadda.

..... **RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED
ORDER DATED 31-12-2020 WHEREBY THE APPELLANT HAS
BEEN DISMISSED FROM SERVICE AND AGAINST THE
APPELLATE ORDER DATED 30-03-2023 COMMUNICATED ON
03.04.2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE
APPELLANT HAS BEEN REGRETTEED ON NO GOOD GROUNDS.**

PRAYER:

**That on acceptance of this appeal the impugned order dated
31-12-2020, and the Appellate order 30-03-2023 may very
kindly be set aside and the appellant may kindly be reinstated
into service with all back benefits. Any other remedy which
this august Tribunal deems fit that may also be awarded in
favor of the appellant.**

R/SHWETH:

ON FACTS:

- 1. That appellant was an employee of the respondent Department and performing his duty with full zeal & zest and up to the entire satisfaction of his high ups.
- 2. That the appellant while performing his duty was charged in a criminal case vide FIR No.274 Dated: 26-10-2020 under section 420/468/471 PPC in Police Station Charsadda and was charge sheeted for absence. Copy of the charge sheet is attached as annexure**A.**
- 3. That the learned Judicial Magistrate, Charsadda, vide order/ judgment dated 20-09-2022 acquitted the appellant from all the charges levelled against him. Copy of acquittal order dated 20-09-2022 is attached as annexure**B.**

4. That after securing acquittal from the competent court of law when the appellant approached the concerned quarter concerned for joining his duty the appellant was handed over the impugned order dated 31.12.2020 whereby he was dismissed from service. Copy of the order dated 31.12.2020 is attached as annexure.....**C.**
5. That appellant feeling aggrieved from the impugned order dated 31.12.2020 preferred departmental appeal which was rejected by the appellate authority vide appellate order dated 30.03.2023 communicated on 03.04.2023. Copies of departmental appeal & appellate order dated 30.03.2023 are attached as annexure.....**D&E.**
6. That feeling aggrieved and having no other remedy filed the instant appeal on the following grounds amongst the others.

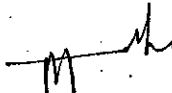
GROUND:

- A- That impugned order dated 31-12-2020 and Appellate order dated 30-03-2023 issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That it is too heartburning that when the competent court of law has acquitted the appellant for the criminal charges, then there is no plausible ground or justification to proceed and punish the appellant for one and the same charges. The act of respondents is tantamount to double jeopardy which is strictly forbidden by the constitution of Islamic Republic of Pakistan 1973.
- D- That appellant was charge sheeted for some other allegations but was dismissed on the ground of FIR, for which the appellant was not charge sheeted.
- E- That no charge sheet and statement of allegations was served upon the appellant before the issuance of the impugned orders.
- F- That no regular inquiry has been conducted in to the matter, hence the appellant has been condemned unheard:-
- G- That no right of personal hearing and personal defense has been provided to the appellant.

- H- That, the treatment meted out to the appellant clearly based on discrimination and mala fide and as such the respondents violated the Principle of Natural Justice.
- I- That even otherwise the penalty imposed upon the appellant is very harsh by Dismissing the appellant from service which does not commensurate with the facts and circumstances of the case of the appellant which is not maintainable in the eye of law.
- J- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 12-05-2023



APPELLANT
MOHSIN

Through:



NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT



KAMRAN KHAN



UMAR FAROOQ



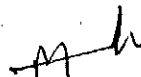
WALEED ADNAN



MAHMOOD JAN
Advocates, Peshawar

AFFIDAVIT

I, Mohsin, Ex-Constable No: 1249, DFC PS Sardheri, Charsadda, do hereby solemnly affirm and declare on Oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

.4-

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

CM NO. _____/2023

IN

APPEAL NO. _____/2023

MOHSIN

VS

POLICE DEPTT:

**APPLICATION FOR CONDONATION OF DELAY IN FILING THE
ABOVE NOTED APPEAL.**

R.SHEWETH:

- 1- That the appellant has filed an appeal along with this application in which no date has been fixed so far.
- 2- That the appellant prays for the condonation of delay in filing the above noted appeal on the following grounds inter alia:

GROUND OF APPLICATION:

- A- That valuable rights of the appellant are involved in this case hence the appeal deserves to be decided on merit.
- B- That it has been the consistent view of the Superior Courts that cases should be decided on merit rather than technicalities including the limitation. The same is reported in 2004 PLC (CS) 1014 and 2003 PLC (CS) 76.

It is therefore prayed that on acceptance of this application the delay in filing the above noted appeal may please be condoned.

APPELLANT 
MOHSIN

THROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**



OFFICE OF THE
DISTRICT POLICE OFFICER, CHARSADDA
PHONE# 091-9220400 FAX#091-5514661
EMAIL: charsadda.dpo@yahoo.com
CHARGE SHEET UNDER KPK POLICE RULES 1975

11A" 2
-5-

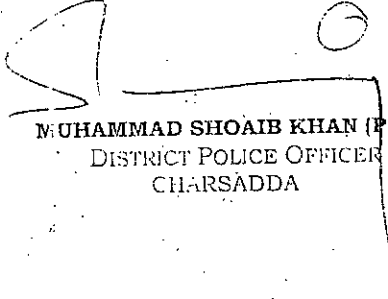
I, **Muhammad Shoab Khan**, District Police Officer Charsadda, as competent authority hereby charge you Constable Mohsin No:1249, as follows.

That you Constable Mohsin No. 1249, while posted at Police Station Sardheri as DFC, absented yourself from your lawful duty vide DD No.32 dated 10.10.2020 of PS Sardheri to till date without any leave or prior permission from your senior officers. Besides, SP Investigation Charsadda reported vide his office letter No.127/Complaint/Inv: dated 15.10.2020, that you are irresponsible & don't take interest in official duties due to which the District & Session Judge Charsadda called SHO/CIO to the court and complained regarding non-compliance of court orders in time. You also showed great negligence due to which DD No.04 dated 10.10.2020 was entered against you.

This shows your inefficiency and lack of interest in the performance of your official duties.

This amounts to grave misconduct on your part, warranting Departmental action against you as defined in section-6(1) (a) of the KPK Police Rules 1975.

1. By reason of the above, you appear to be guilty of misconduct under section 02(III) of the KPK Police Rules 1975 and has render yourself liable to all or any of the penalties as specified in section 04 (i) a & b of the said rules.
2. You are therefore, directed to submit your written defense within seven days of the receipt of this Charge Sheet to the Enquiry Officer.
3. Your written defense, if any should reach to the enquiry officer within the specified period, in case of failure, it shall be presumed that you have no defense to put-in and in that case an ex-parte action shall follow against you
4. Intimate, whether you desired to be heard in person.


MUHAMMAD SHOAB KHAN (PSP)
DISTRICT POLICE OFFICER
CHARSADDA

Legible Copy

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

PHONE# 091-9220400 FAX #091-6514661

EMAIL: Charsaddadpo@yahoo.com

CHARGE SHEET UNDER KPK POLICE RULES 1975

1. **Muhammad Shoaib Khan**, District Police Officer Charsadda. as competent authority hereby charge you Constable Mohsin No.1249, as follows.

That you Constable Mohsin No. 1249, while posted at Police Station Sardheri as DFC, absented yourself from your lawful duty vide DD No.32 dated 10.10.2020 of P.S Sardheri to till date without any leave or prior permission from your senior officers. Besides, SP Investigation Charsadda reported vide his office letter No.127/Complaint/Inv: dated 15.10.2020, that you are irresponsible & don't take interest in official duties due to which the District & Session Judge Charsadda called SHO/CIO to the court and complained regarding non-compliance of court orders in time. You also showed great negligence due to which DD No.04 dated 10.10.2020 was entered against you.

This shows your inefficiency and lack of interest in the performance of your official duties.

This amounts to grave misconduct on your part, warranting Departmental action against you as defined in section-6(1) (a) of the KPK Police Rules 1975.

1. By reason of the above, you appear to be guilty of misconduct under section 02/111) of the KPK Police Rules 975 and has render yourself liable to all or any of the penalties as specified in section 04 (I) a & b of the said rules.
2. You are therefore, directed to submit your written defense within seven days of the receipt of this Charge Sheet to the Enquiry Officer.
3. Your written defernse, if any should reach to the enquiry officer within the specified period, in case of failure, t shall be presumed that you have no defense to put-in and in that case a ex-parte action shall follow against you
4. Intimate, whether you desired to be head in person.

Sd/-

MUHAMMAD SHOAIB KHAN (PSP)
DISTRICT POLICE OFFICER
CHARSADDA

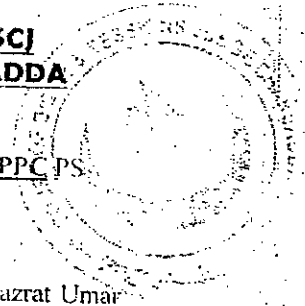
-6-

"B"

Handwritten signature

**IN THE COURT OF KIRAN SHAUKAT, SCJ
(JUDL)/JUDICIAL MAGISTRATE, CHARSADDA**

State VS Muhsin
Case FIR No. 274 dated 26.10.2020 u/s 420/468/471 PPC PS
Charsadda



ORDER-
20.09.2022

17/29
SP
26/6/21
12-2-21
Neo
22-9-22
22-10-22
Sharan
20/9/22

Present: A.P.P for the State. Accused Mohsin, Hazrat Umar and Fazal Akbar on bail alongwith counsel. Accused Muhammad Fayyaz absconding.

Arguments on application u/s 249-A Cr.P.C heard and record gone through.

Brief story of the prosecution case is that the complainant Badar Bakht SHO alongwith Police patrol party on 14-10-2020 at 07:40 Hours during gasht at Bahlola Bazar, intercepted Motor Car Alto bearing No. LWR/2456 Chassis No. SB 308PK880498 Engine No. B-342006 driven by Fazal Akbar, Motor Car Alto bearing Regd No.3101-RIA Engine No. NC-B-424554. Chassis No. SB308PK963095 driven by Mohsin and Motor Car Corolla bearing Registration No. KA012. Engine NO.2NZFE1299 and Chassis NO. NZE120-6030394 driven by one Hazrat Umar that the drivers on query failed to produce any registration documents of the vehicles so the said vehicle being suspected to be their property were seized U/Ss 523/550 Cr.PC while the drivers were rounded down U/S 54 Cr.PC and in this regard Naqal Mad No.17 dated 14-10-2020 was entered in the relevant register; that permission for inquiry from the court was obtained and on receipt of MRA/SL reports, the instant Case FIR was lodged U/Ss 420,468 & 470 FPC. During the course of investigation, Statement of Mohsin U/S 161 Cr. PC was recorded who disclosed he had purchased vehicle bearing Regd No.3101-RIA from One Muhammad Fayyaz, therefore, the said Muhammad Fayyaz was also inculpated in the case as accused Hence, the present case.

On completion of investigation, complete challan against the accused was submitted by the prosecution on 12-02-2021 before the

-7-

learned Judicial Magistrate-I, Charsadda. Based upon DFC report, Accused Muhammad Fayaz was declared proclaimed offender vide order dated 25-02-2021 whereas Provision u/s 241-A Cr. PC complied with the present accused. Formal charge was also framed, to which the accused did not plead their guilt and claimed trial. Later on, the case was entrusted to this court vide order 26.06.2021 of the Honorable District & Sessions Judge Charsadda whereafter statement of prosecution witnesses was recorded as PW-02 to PW-05.

Perusal of the record would transpire that it has not been proved that whether the accused have re-stamped the Chassis plate or otherwise the accused was cheated by someone. As per available record, all the accused have produced the documents regarding the purchase of vehicle (recovered from them) showing all of them, bonafide purchaser but the investigation officer has not proceeded his investigation to the logical end there is nothing on record to attribute any sort of tempering to accused. In this regard statement/cross examination of Investigation Officer is worth perusal wherein he admitted that accused are the bonafide purchaser of the vehicles taken in possession and that during inquiry in instant case, no other person were charged. He further admitted that during inquiry he has not received any MRA reports qua the documents produced by the accused. He also admitted that during inquiry he had not recovered any instrument of tampering etc from the accused.

Divan
20/9/22

In view of the discussion, there exists no probability of the conviction of the accused Mohsin, Hazrat Umar and Fazal Akbar, if the prosecution succeeds to produce their evidence. Further under the scheme of "criminal administration of Justice" the accused has always an edge over the prosecution till the determination of his guilt because during such process, he is to be presumed innocent and a single reasonable doubt can be sufficient to earn him acquittal. Section 249-A Cr. PC empowers a Magistrate to acquit an accused at any stage of the proceeding, if for the reasons to be

Stamp of the court, District & Sessions Judge, Charsadda.


-8-

recorded he believes that either the charge is groundless or there is no probability of the accused being convicted.

For the reasons elucidated above, there seems no prospect of accused to be convicted, hence, the accused namely Mohsin, Hazrat Umar and Fazal Akbar are hereby acquitted u/s 249-A Cr.PC. Since, they are on bail, their bail bonds stand cancelled and sureties are absolved. More so, prosecution through evidence and record on file has made out a good case against the absconding accused Muhammad Fayyaz, thus, he is declared as Proclaimed offender. His name be entered in the relevant register at PS. Perpetual warrant of arrest be issued against him, Case property be kept intact till arrest and trial of PO.

File be consigned to Record Room after its necessary completion & compilation.

Announced.
20.09.2022.


(Mohsin) (Signature)
S.C.J. Judicial Magistrate
Charsadda

20/09/2022
20/09/2022
20/09/2022
20/09/2022
20/09/2022
20/09/2022
20/09/2022
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20/09/2022

ORDER

"C" 9-

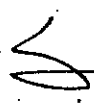
This order will be disposed off departmental inquiry against Constable Mohsin No. 1249, who while posted as DFC PS Sardheri was reported directly charged in case FIR No. 274 dated 26.10.2020 u/s 420/468/471 PPC PS Khanmai evident vide SP/Investigation letter No. 1749/Inv: dated 27.10.2020 which shown his inefficiency and negligence in the performance of his official duty.

On the above allegation, he was issued charge sheet together with statement of allegations under sub section 3, Section 5 of Police Rules 1975 and Mr. Khalid Khan DSP/Tangi was appointed as Enquiry Officer. Proper departmental enquiry was conducted into the matter and on fulfillment of all codal formalities, submitted his findings.

After going through the enquiry papers & recommendation of the enquiry officer and keeping in view the recovery of tempered vehicle from the possession of delinquent official and indulgence in criminal act, Constable Mohsin No. 1249 is hereby dismissed from service with immediate effect.

OB No-1240

dt-31-12-20


MUHAMMAD SHOAIB KHAN (PS)
District Police Officer,
Charsadda

No. 1813-20/HC, dated Charsadda the 31/12/2020

Copy for information to the:-

- 1) SP/Investigation Charsadda.
- 2) District Accounts Officer, Charsadda
- 3) DSP/Sardheri
- 4) EC/FMC/Pay Officer

بخدمت جناب RPO صاحب ضلع مردان

جناب عالی! درخواست بہراد بھالی سروس

حسب ذیل عرض ہے۔

1- یہ کہ محسن خان ولد عمر خان سکنہ جہاڑہ عمر زئی ضلع چارسدہ کا ہے یہ کہ سائل محکمہ پولیس میں بیلٹ نمبر 1249 حاضر سروس تھا۔

2- سائل کا مسمی نوشاد کے ذمہ -/550000 واجب الادا تھے پیسے کی وصولی پر مسمی نوشاد نے ایک عدد گاڑی 6110 دیکر پیسوں کے ادا کرنے سے معذرت کی۔

3- سائل نے مجبوراً رقم کے بدلے میں گاڑی لے لی جس کے بعد میں معلوم ہوا کہ گاڑی ٹیپر تھا جس کی وجہ سے ASI آمین خان نے محسن خان بمعہ فضل اکبر اور حضرت عمر تھانہ خان نمائی میں FIR علت مقدمہ بتاریخ 26/10/2020 جرم PPC 471-468-420 درج کیا تھا جس کی بناء پر DPO چارسدہ نے سائل کو معطل کیا تھا سائل حصول انصاف کیلئے عدالت حضور سے رجوع کیا اور عدالت حضور نے بتاریخ 20/09/2022 کو محسن خان کو بے گناہ ثابت کر کے باعزت بری کیا، آپ صاحبان سے گزارش ہے کہ سائل کو اپنے سروس پر بحال کریں۔

ORDER.

"E"

-11-

This order will dispose of the departmental appeal preferred by Ex-Constable Mohsin No. 1249 of Charsadda District Police against the order of the then District Police Officer, Charsadda, whereby he was awarded major punishment of dismissal from service vide OB: No. 1210 dated 31.12.2020. The appellant was proceeded against departmentally on the allegations that he while posted as DFC Police Station Sardheri was charged in case vide FIR No. 274 dated 26.10.2020 U/S 468/471-PPC Police Station Khanmai as evident vide Superintendent of Police, Investigation, Charsadda letter No. 1749/Inv: dated 27.10.2021.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and Sub Divisional Police Officer, (SDPO) Tangi, Charsadda was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities submitted his findings, wherein he recommended the delinquent Officer for major punishment.

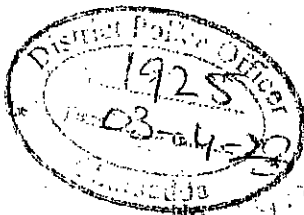
The then District Police Officer, Charsadda after agreeing with the recommendations of Enquiry Officer and keeping in view the recovery of tempered vehicle from the possession of delinquent Officer as well as his indulgence in criminal act. Therefore, he was awarded major punishment of dismissal from service by the then District Police Officer, Charsadda vide his office OB: No. 1210 dated 31.12.2020.

Feeling aggrieved from the order of the then District Police Officer, Charsadda, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 22.03.2023.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt. Moreover, the involvement of appellant in such like activities is clearly a stigma on his conduct. Hence, the retention of appellant in Police Department will stigmatize the prestige of entire Police force as instead of fighting crime, he has himself indulged in criminal activities. The appellant approached this forum at a belated stage by filing the instant appeal which is badly time barred by 02 years, 01 month and 06 days without advancing any cogent reason regarding such delay. Moreover, he could not present any cogent justification to warrant interference in the order passed by the competent authority.

Keeping in view the above, I, Muhammad Ali Khan, PSP Regional Police Officer, Mardan, being the appellate authority find no substance in the appeal therefore, the same is rejected and filed, being devoid of merit as well as badly time barred by 02 years, 01 month and 06 days.

Order Announced.



(Signature)

Regional Police Officer,
Mardan.

No. 1925 /ES. Dated Mardan the 30 /03 /2023.

Copy forwarded to District Police Officer, Charsadda for information and necessary w/r to his office Memo: No. 205/EO dated 21.02.2023. His service record is returned herewith:

E-c
For n/ action

(Signature)
MOPO ChDU
03-04-2023

ORDER.

This order will dispose of the departmental appeal preferred by Ex-Constable Mohsin No. 1249 of Charsadda District Police against the order of the then District Police Officer, Charsadda, whereby he was awarded major punishment of dismissal from service vide OB: No. 1210 dated 31.12.2020. The appellant was proceeded against departmentally on the allegations that he while posted as DFC Police Station Sardheri was charged in case vide FIR No. 274 dated 26.10.2020 U/S 468/471-PPC Police Station Khanmal as evident vide Superintendent of Police, Investigation, Charsadda letter No. 1749/Inv: dated 27.10.2020

Proper departmental enquiry proceedings were initiated against him. He was Issued Charge Sheet alongwith Statement of Allegations and Sub Divisional Police Officer. (SDPO) Tangi Charsadda was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities submitted his findings, wherein he recommended the delinquent Officer for major punishment

The then District Police Officer Charsadda after agreeing with the recommendations of Enquiry Officer and keeping in view the recovery of tempered vehicle from the possession of delinquent Officer as well as his Indulgence in criminal act. Therefore, he was awarded major punishment of dismissal from service by the then District Police Officer, Charsadda vide his office 03: No. 1210 dated 31.12.2020.

Feeling aggrieved from the order of the then District Police Officer, Charsadda, the appellant preferred the instant appeal He was summoned and heard in person in Orderly Room held in this office on 22 03.2023.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations levelled against the appellant have been proved beyond any shadow of doubt. Moreover the involvement of appellant in such like activities is clearly a stigma on his conduct. Hence in retention of appellant in Police Department will stigmatize the prestige of entire Police force as instead of fighting crime, he has himself indulged in criminal activities. The appellant approached this forum at a belated stage by filing the instant appeal which is barred by 02 years years, 01 month and 05 days without advancing any cogent reason regarding such delay. Moreover, he could not present any cogent justification to warrant reference in the order passed by the competent authority.

Keeping in view the above, I, Muhammad Ali Khan PSP Regional Police Officer, Mardan, being the appellate authority find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit as well as badly time barred by 02 years, 1 months and 06 days.

Order announced

Sd/-
Regional Police Officer,
Mardan

No.1483/ES, dated Mardan the 30/03/2023

Copy forwarded to District Police Officer, Charsadda for information and necessary w/r to his office Memo: 206/EC dated 21.02.2023. His service record is returned herewith.

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No. No /2023

Mohsin

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Police Deptt.

(RESPONDENT)
(DEFENDANT)

I/We Appellant.

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. ___/___/202

[Signature]
CLIENT

ACCEPTED

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

[Signature]
WALEED ADNAN

[Signature]
KAMRAN KHAN

[Signature]
UMAR FAROOQ MOHMAND

~~_____~~
& [Signature]
**MUHAMMAD AYUB
ADVOCATES**

[Signature]
**MUHAMMAD JAWAD
ADVOCATE**

OFFICE:
Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)