

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1101/2022.

Naqeeb Ullah, S/o Ghulam Daraz, Ex-constable belt No. 5846, Frontier Reserve Police, (FRP) Bannu, R/o Kotla Arsala Khan, Ghoraiwal, District Bannu.....Appellant.

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others.....Respondents.

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20/7/2023

Peshawar

RESPONDENTS

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

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VERSUS

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PARAWISE REPLY BY RESPONDENTS 1 to 4.

RESPECTFULLY SHEWETH.

PRELIMINARY OBJECTIONS:-

**Khyber Pakhtunkhwa
Service Tribunal**
Diary No. 6599
Dated 19/12/2022

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
3. That the appellant has no cause of action and locus stand 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 the material facts from this Honorable Tribunal.

FACTS:-

1. Para No. 01 pertains to personal information of the appellant.
2. Para No. 02 is not related.
3. Relates to the appellant record needs no comments.
4. Incorrect. The appellant was found an inefficient Police Officer as he failed to qualify Basic Recruit Course vide Commandant PTC Hangu memo No. 1757-65/S, dated 01.08.2013.(Copy enclosed herewith as annexure "A").
5. Incorrect. The appellant remained absent from his lawful duty with effect from 19.01.2015 to 18.11.2015 and with effect from 19.11.2015 till the date of his discharge from service i.e 11.07.2016 for a long period of 08 months and 22 days, without any leave or prior permission of the competent authority.
6. Incorrect. On the allegations of willful absence the appellant was proceeded against proper departmentally and after fulfillment of all codal formalities he was awarded major punishment of discharge from service by the competent authority.
7. Incorrect. In fact the appellant was well known about his enquiry proceedings as well as the order of his discharge from service and it is evident from Charge Sheet and Show Cause Notice, which were already, served upon him through

special messenger on his home address vide DD report No. 06-08, dated 30.05.2016 and vide DD report No. 05-10, dated 22.06.2016. (Copies of DD reports alongwith Show cause Notice & Charge Sheet are attached herewith as annexure "B, C, D & E"). Hence, the appellant submitted departmental appeal in very belated stage about more than 04 year, which was rejected on the grounds of badly time barred vide order Endst; No. 11195-96, dated 01.12.2020.

8. Incorrect. The appellant failed to submit revision petition before the respondent No. 04.
9. Incorrect. The relevant record has already been provided to the appellant.
10. The appellant has not come to this Honorable Tribunal with clean hands, hence this appeal being devoid of merits may kindly be dismissed on the following grounds.

GROUND:-

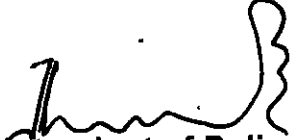
- A. Incorrect. The impugned orders passed by the replying respondents in the case of appellant are legally justified and in accordance with law/rules.
- B. Incorrect. As the appellant was already proceeded with proper departmentally and after fulfillment of due codal formalities the impugned order has been passed by the competent authority required as per law/rules. Besides, a sufficient opportunity for defense being heard in person in the light of natural justice was also offered to the appellant accordingly.
- C. Incorrect. That a correct and speaking order of discharge from service in the case of the appellant was issued by the competent authority after fulfilling of due codal formalities required as per law/rules. Hence, the punishment awarded to the appellant is commensurate with the gravity of his gross misconduct.
- D. Incorrect. On the allegations of willful absence the appellant was proceeded against proper departmentally as he was issued Charge Sheet alongwith Summary of Allegations and an Enquiry Officer was nominated. The Charge Sheet was served upon the appellant through special messenger on his home address and his signature was obtained as a token of receipt. After completion of enquiry, the Enquiry Officer submitted his findings report, wherein the allegations of willful absence have fully established against him. Upon the findings of Enquiry Officer, the appellant was served with Final Show Cause Notice, but he failed to submit his reply or appeared before the competent authority, despite the fact the appellant was called for personal hearing time and again on his cell phone vide No. 0334-8802557, but he did not turn up. (Copy of Enquiry report attached herewith as annexure "F")

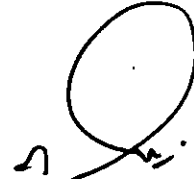
- E. Incorrect and denied. The appellant was absolutely treated in accordance with law within the meaning of Article 4 of the constitution by giving him sufficient and proper opportunities at every level of defense and that the entire proceedings were carried out in accordance with existing laws and rules. Thus such major punishment awarded to the appellant is legally justified and commensurate with the gravity of his gross misconduct.
- F. Incorrect. As the appellant was already proceeded against proper departmentally under the relevant law and his guilt was fully established by the Enquiry Officer during the course of enquiry. After fulfillment of all codal formalities, the major punishment of discharge from service was awarded to him by the competent authority. The plea of contractual employee law, taken by the appellant in the Para is not considerable in this stage, while he was supposed to have taken this plea in his departmental appeal or before the appellate authority during personal hearing.
- G. Incorrect. The punishment order issued by the competent authority in the case of appellant is legally justified and in accordance with law/rules, as the same was passed after fulfillment of codal formalities required as per law/rules. Thus the authority of the Apex Court of Pakistan mentioned in the para is not applicable to the case of appellant.
- H. Incorrect. As the appellant was remained absent from his lawful duty for a long period of 08 months and 22 days without any leave or prior permission of his seniors. The plea of illness taken by the appellant is a propounded story and he is supposed to have taken this plea before the Enquiry Officer or before the competent authority during the course of enquiry. Moreover, the appellant failed to submit any medical prescription before the Enquiry Officer during the course of enquiry.
- I. Incorrect. As departmental appeal submitted by the appellant in very belated stage and the same was rejected on the ground of badly time barred. However, the plea of illness taken by the appellant in departmental appeal is a propounded story.
- J. Incorrect. As the appellant was remained absent from duty willfully and deliberately, without any leave or prior permission of the competent authority. Thus the willful absence from duty is fallen in the ambit of a gross misconduct.
- K. Incorrect. As discussed in the instant reply above, the appellant was proceeded against proper departmentally as per law/rules. Besides, during the course of enquiry, the appellant was also contacted by the Enquiry Officer time and again on his cell phone vide No. 0334-8802557, but he deliberately failed to appear before the Enquiry Officer or before the competent authority.


- L. Incorrect. The appellant is trying to mislead this Honorable Tribunal. In fact the respondents have not committed any violation of law/rules.
- M. Incorrect. Departmental appeal of the appellant was thoroughly examined as the relevant record of the case was obtained and the appellant was also heard in person by the appellate authority in orderly room held on 12.11.2020, but he failed to prove himself innocent.
- N. Incorrect. The order issued by the competent authority in the case of the appellant is legally justified and accordance with law/rules, which commensurate with the gravity of his gross misconduct. In these circumstances the appellant did not deserve for any leniency or complacency to convert his major punishment into minor punishment.
- O. The respondent may also be permitted to raise additional grounds at the time of arguments.

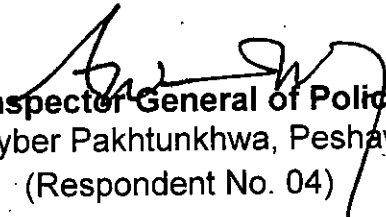
PRAYERS:-

Keeping in view the above facts and circumstances, it is most humbly prayed that the instant service appeal being not maintainable may kindly be dismissed with costs please.


Superintendent of Police FRP,
Bannu Range, Bannu
(Respondent No. 01)

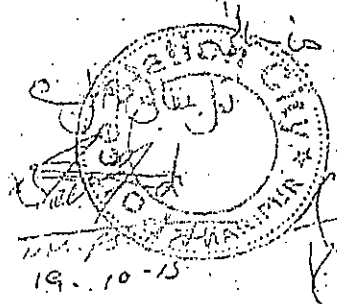

Deputy Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 03)


Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 04)

کھانہ سٹی نقل ریٹ 35 روپے 19/10/15

ریپورٹ غیر حاضر کی 19/10/15 وقت 19:50 بجے ریپورٹ ہیک FRP میں
 کی پلاٹوں 129 ٹھیکانہ ہذا ہے جو اس وقت پلاٹوں میں فرزند شاہ
 5849 اور اپنے آپ پلاٹوں کا فرزند ہونا بلانا کے کو طلب کیا گیا ہے
 سے دریافت لفر کی توتی۔ جو لفر کی فیہرٹ مکمل دینے سے
 فرزند شاہ بلاٹن سے رالعد ہوا مذکورہ فرزند شاہ نے بلاٹیاک FRP افسران
 کی طرف سے 19 ملازم پولیس کھانہ سٹی کیلئے ٹھیکانہ میں جن میں سے
 صرف 7 کنسٹیبلن کھانہ سٹی بھجوائے گئے ہیں جبکہ وہ خود یعنی
 فرزند شاہ 5842 اور نصرت اللہ 6935 فرزند اور گیارہ کنسٹیبلن
 1) ابراہیم SB19 2) محمد کامران 5830 3) نور شہیرہ SB36 4) شاکر
 اللہ SB33 5) ابرار SB39 6) رضیاء SB44 7) ندیم SB45 8)
 نصرت اللہ SB46 9) فرمان 6204 10) شاہ زیب 6213 11) نصرت اللہ
 6216 اور عبدالصان 6217 کو اس سے گھراؤد عموماً ہوا ہے جبکہ فرزند
 6935 کا بھی گھراؤد ہونا بلاٹیا (وزعاً لفر کی فیہرٹ بنا کر دی جسکا اپنا
 پلاٹوں بحال ہے بلکہ نصرت اللہ افسران بلاٹیا رخصت ہر ہونا معلوم ہوا مذکورہ
 فرزند بار بار فیہرٹ طلب کرنے نہریت نہر کی جو مذکورہ فرزند (یہی بادشاہی
 قائم کرتے خود لفر کو گھراؤد ہوا ہے اس لفر کو فرزند کے پاس
 ہر وہ بنا جانے کیا لفر کاٹ ہیں فرزند 6935 اور گیارہ کنسٹیبلن بلاٹ
 کنسٹیبلن کی غیر حاضر کی درج روزنامہ سے نقل ریٹ بلکہ ہر مرتب ہو کر
 ہر اہل مناسب کارروائی جتا۔ افسران الائی خدمت میں ارسال ہوگی



FORWARDED PL.

advised
 cab city
 SHO-PS-15
 20.10.15

21-10-15

Attested
 [Signature]

Deputy Commandant
 Frontier Regions Police
 Rawalpindi

3'

CHARGE SHEET

WHEREAS I am satisfied that a formal inquiry as contemplated in the Khyber Pakhtunkhwa, disciplinary Rules, 1975 is necessary and expedient.

AND WHEREAS, I am of the view that the allegations if established would call for a major penalty as defined in Rules 4-1 (b) of the aforesaid Rule.

NOW, THEREFORE, as required in 6-1 (a) of the aforesaid Rule I, Muhammad Shafiq Khan Superintendent of Police FRP, Bannu as competent authority, hereby charge you Constable Nageeb Ullah No.5846 for the allegations, attached with this charge sheet.

AND I direct you further under rules 6-1 (b) of the aforesaid Rules to put in written defense within 07 days of the Receipt of this Charge Sheet as to whether major or Minor punishment as defined in Rules 4-1(b) should not be awarded to you. Also state at the same time whether you desire to be heard in person or not.

In case, your reply is not received within the prescribed period without sufficient reason, it would be presumed that you have nothing to say in your defense and the undersigned would be at liberty to take ex-parte action straight away against you.

Amir
Superintendent of Police,
FRP, Bannu
Superintendent Of Police
FRP/ Bannu

Attested

[Signature]

[Signature]
[Signature]

03339744980

16-11-015



[Handwritten notes in Urdu]
بیس
س
کریڈٹ
کریڈٹ
کریڈٹ

Cin c 11101-3077011-3

32

SUMMARY OF ALLEGATIONS

You Constable Naqeeb Ullah No.5846 were found to indulge in misconduct under the following allegations.

1. Reportedly to have found absent from duty, while deployed at Distt: Haripur vide daily diary No.35 dated 19-10-2015 till date without getting any leave or legal permission of the superiors.
2. That Deputy Commandant FRP KPK Peshawar has taken a serious notice of the matter vide his good office Endst: No.1779-80/PA/Dy: Comdt: dated 03-11-2015 with the directions to take stern departmental action against the absentee.
3. Ceased to become good police officer.

Mr. Sattar Khan SI/PC of Bannu Region is appointed to hold departmental proceedings and submit his to the undersigned after observing legal formalities. The Enquiry Officer shall, in accordance, provide reasonable opportunity of hearing to the accused, record its findings and make within (25) days of the receipt of this order; recommendation as to punishments or other appropriate action against the accused.

No = 3675-76

dt. 06-11-15

Superintendent of Police
FRP, Bannu

Copy to:

- 1) The inquiry officer for initiating proceedings against the accused within stipulated period.
- 2) The concerned Constable with the directions to appear before the inquiry officer on the date, time and place fixed by the inquiry officer.

Attest
[Signature]

[Signature]
Superintendent of Police
FRP, Bannu
Superintendent of Police
FRP, Bannu

نا: حکمانہ انکوائری بر خلاف کنٹریبل لقیب اللہ 5846 متعینہ جوڈیشل عملیہ
FRP مناب عالی :-

حوالہ چارج شیٹ سمیری آف اینگیشن 76-3675 مورثہ 11/06/15ء جاریہ

SP صاحب بیوی بیٹے بیوی معروض بیوی کے چارج شیٹ میں آ

کنٹریبل لقیب اللہ 5846 کے خلاف الزام ہے کہ حوالہ 35

19/10/15ء صوری پور سے بدستور غیر حاضر جلد آ رہا ہے۔

چارج شیٹ سمیری آف اینگیشن بغیر حکمانہ انکوائری دفتر ہذا موصول

یوکر الزام علیہ کنٹریبل لقیب اللہ 5846 بار بار طلب کیے ماضی میں

آ رہا ہے اور نہ ہی چارج شیٹ ماحول میں دیتا ہے مگر کنٹریبل

لقیب اللہ 5846 حوالہ 35 روزناچہ 19/10/15ء تقانہ سٹی صوری پور سے

غیر حاضر ہو کر حوالہ 30 روزناچہ 18/11/15ء جوڈیشل کمپیکس بیوی

میں اپنی ماضی کا ہے مذکورہ کنٹریبل کے ساتھ بار بار موبائل

فون وغیرہ 0334-8802557 پر رابطہ کیا گیا مگر کنٹریبل لقیب اللہ 5846

مذکورہ نے اپنی غیر حاضر کے بابت کوئی حوالہ پیش نہ کر سکا

اور نہ ہی وصول کردہ چارج شیٹ ماحول میں دیتا ہے

مطابق SRe مذکورہ کنٹریبل لقیب اللہ 5846 مورثہ 11/06/15ء

FRP ریکارڈ کے مطابق کوئل اسروس 4 سال، 23 دن بنتی

ہے۔ مذکورہ کے سروس بک میں 31 نومبر غیر حاضری انٹری

شمارہ ہے جس میں 19 نومبر غیر حاضری بلڈ ٹنچورہ، 12 نومبر غیر حاضری

رحمت میں شمار اور 6 نومبر رحمت مکمل موجودہ سروس

روک میں انٹری شمارہ ہے۔

FINDI کنٹریبل لقیب اللہ 5846 کوئل 29 نومبر غیر حاضر ہوا ہے

Attest اور باقاعدہ طور پر چارج شیٹ یعنی اس پر تقسیم ہو

Handwritten signature

29
پکارتے ہیں لیکن ابھی تک مذکورہ کنسٹیبل لقیب اللہ 5846
FRP

نیٹ باجوہ دیتا ہے اور نہ ہی انکو انٹرویو کے سلسلے

حاضر ہوا ہے۔ جس سے یہ بات واضح ہوتی ہے کہ

کنسٹیبل لقیب اللہ 5846 FRP نے قہراً اقدار غیر حاضر کیا ہے۔

مزاحمت کا حقدار ہے۔ مزید حکم فرما کر بالافضل ہے اور

عرف ہے

20/6/16

20/6/16

Issue Final Show Call etc

MS
Superintendent Of Police
FRP - Bahawalpur

Attested

I, MOHAMMAD SHAFIQ KHAN, Superintendent of Police, FRP Bannu Range, Bannu as competent authority, under the KPK Removal from Service (Police Rules, 1975), do hereby serve upon you this Final Show Cause Notice Constable Nageeb Ullah No.5846/FRP as follow.

1- That consequent upon the completion of inquiry conducted against you by an Enquiry Officer for which you were given opportunity of hearing.

On going through the findings and recommendations of the Enquiry Officer and the material on record and other connected papers including your defense before the said Enquiry Officer.

I am satisfied that you have committed the following acts/omissions specified in section 3 of the Khyber Pakhtunkhwa, (Police Rules, 1975).

- ❖ Reported to have found absent from Govt: duty vide DD No.35 dated 19-10-2015 to DD No.30 dated 18-11-2015 Total (29 days) without any leave or legal permission of the competent authority.
- ❖ That being a member of discipline force, ceased to become good police officer.

2- As a result thereof, I, Mohammad Shafiq Khan, Superintendent of Police, FRP Bannu Range, Bannu as competent authority have tentatively decided to impose upon you the penalty of minor/ major punishment under section 3 of the Khyber Pakhtunkhwa, (Police Rules, 1975).

3- You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you.

4- If no reply to this notice is received within seven days of the receipt of this final show cause notice, in the normal course of circumstances, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

5- The copy of the findings of the Enquiry Officer is enclosed.

NO. 1219 Date 14-6-016

Nageeb Ullah محمد نایب اہل
1101. 1212 705-S شہنشاہی کارڈ نمبر
0331-880557 مولانا محمد
22-06-016 شہان اہل
2200

AMQ
 Superintendent of Police
 FRP, Bannu
 Superintendent of Police
 FRP/ Bannu
 Attested
[Signature]

تذکرہ فاضل شوکانہ گولڈ انڈائنرز نمبر 1220، 1219، 1416/1016

کتاب اللہ رقم 5846 بابت جوہن ہون۔ کوئی تذکرہ جاری نہیں
انڈائنرز کے فائبرنگ رجسٹر رضا افسرین بابت فاضل شوکانہ گولڈ

کارڈز کے احکامات جاری کیے اور باقاعدگی کے تذکرہ کو فاضل شوکانہ

گولڈ نمبر 1220، 1219، 1416/1016 جاری کیے۔ جاری شدہ فاضل شوکانہ

گولڈ نمبر 1220، 1219، 1416/1016 باقاعدہ نامی انڈائنرز کے لیے مدد کیلئے رقم 7657

کے ذریعہ مالی گاؤں اور علاقہ جوہن کسٹم کر کے چھوٹے گئے۔ نامی گولڈ تذکرہ

بابت ذریعہ کسٹم کر کے۔ جوہن پید کیلئے رقم 7657 کے ذریعہ

پر واقع بذات خود کسٹم کے گورنر اور جوہن پید کیلئے فاضل شوکانہ

گولڈ کے افسر قابل پر مشتمل ہیں۔ جو انڈائنرز کے لیے

کیلئے تذکرہ انڈائنرز کے ساتھ کو غیر صوفی / صوفی ذات کے ذریعہ

دینے 35 روزانہ 19/10 تا 18/11 تک 50 روپے

اور دینے 15 روزانہ 19/11 سے بدستور غیر صوفی / صوفی ذات کے

ذاتی اگلی کتاب رقم 5846 کی کاپیوں کے ساتھ

کیلئے تذکرہ کا نام کے ساتھ رجسٹر کے ساتھ گولڈ 50 روپے

بابت غیر صوفی / صوفی ذات کے لیے جوہن سے 19 روپے غیر صوفی /

بابت صوفی / صوفی ذات کے لیے جوہن سے 19 روپے غیر صوفی /

بابت صوفی / صوفی ذات کے لیے جوہن سے 19 روپے غیر صوفی /

کیلئے تذکرہ کا نام کے ساتھ رجسٹر کے ساتھ گولڈ 50 روپے

Attested
[Signature]

کے بعد واپس آئے اور 31 جولائی کو لاہور میں تھے۔ دور و دراز 15 اور 16 جولائی 1916ء

جو کہ ایک عینک بنانے سے بدصور غیر لائق ہے۔ جو کہ اس کے

تک بدصور غیر لائق ہے۔ ایسی قسم کے لالوں کی رپورٹ میں ہے۔

کو نہ دیا گیا تھا۔ ذکرہ نے چار ایکڑ زمین شوالہ شکر ٹرسٹ

اور لاہور میں تقسیم شدہ زمینوں میں سے ایک ایکڑ زمین اس کے

پر ذکرہ کو دیا گیا ہے جسے وہ زمینوں سے حاصل کرے گا۔ نہ ہی اسے

میلوں ہے۔ کہ اسے ان زمینوں کے ٹیکس کی تفصیل میں لکھا گیا ہے۔ ذکرہ

کے ایسے ہی زمینوں کا ذکر ہے جو کہ ان زمینوں پر اس کے

پر ان زمینوں میں سے ہیں۔ ان کے ذکرہ بدصور غیر لائق ہے

کو جو کہ اسے زمینوں کو اسے ان زمینوں کے ٹیکس کی تفصیل میں لکھا گیا ہے

پر جو کہ اسے زمینوں کا حق دار ہے۔ جو کہ اسے زمینوں کے ٹیکس کی تفصیل میں لکھا گیا ہے

کے لئے ہے۔ جنہیں اسے زمینوں کا حق دار لکھا گیا ہے۔

EO:Si:PL
11-07-16

ORDER

Discharge from Service from
the date of absence -

Superintendent of Police
Feroz Khan

Order No = 274
11-07-16

Attested
[Signature]

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1101/2022.

Naqeeb Ullah, S/o Ghulam Daraz, Ex-constable belt No. 5846, Frontier Reserve Police, (FRP) Bannu, R/o Kotla Arsala Khan, Ghoraiwal, District Bannu.....Appellant.

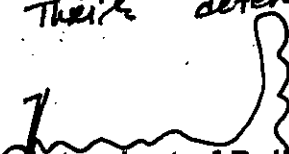
VERSUS


Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others.....Respondents.

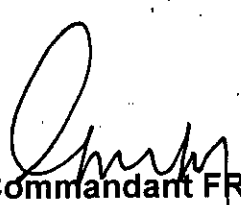
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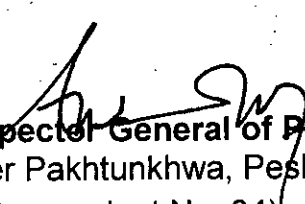
We respondents No. 1 to 4 do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments is correct to the best of our knowledge and belief that nothing has been concealed from this Honorable Court.

It is further stated on oath that in this Appeal, the answering respondents have neither been placed ex-parte/cost nor their defence is struck off.

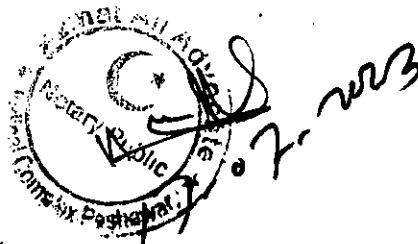

**Superintendent of Police FRP,
Bannu Range, Bannu
(Respondent No. 01)**


**Deputy Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 03)**


**Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)**


**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 04)**

ATTESTED


Notary Public
Khyber Pakhtunkhwa, Peshawar
07/03/2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1101/2022.

Naqeeb Ullah, S/o Ghulam Daraz, Ex-constable belt No. 5846, Frontier Reserve Police, (FRP) Bannu, R/o Kotla Arsala Khan, Ghoraiwal, District Bannu.....Appellant.

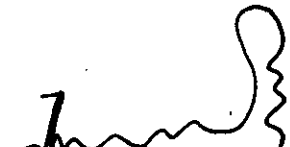
VERSUS


Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others.....Respondents.


AUTHORITY LETTER


Respectfully Sheweth:-

We respondents No. 1 to 4 do hereby solemnly authorize Mr. Rahmat Ali Khan DSP FRP HQrs; to attend the Honorable Tribunal and submit affidavit/Para-wise comments required for the defense of above Service Appeal on our behalf.


**Superintendent of Police FRP,
Bannu Range, Bannu
(Respondent No. 01)**


**Deputy Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 03)**


**Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)**


**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 04)**