

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1640/2022.

**Muhammad Asad Khan, (Ex-constable) S/o Hameed Khan, R/o Togh Bala Payan,
Tehsil & District Kohat.....Appellant.**

VERSUS

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

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RESPONDENTS

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

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Tehsil & District Kohat.....Appellant.**

VERSUS

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

PARAWISE REPLY BY RESPONDENTS 1 to 3.

RESPECTFULLY SHEWETH.

PRELIMINARY OBJECTIONS:-

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 6953

Dated 10/08/23

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. Incorrect. It is material of facts that the appellant is found a habitual jailbird as during his short length of service in police department he was twicely involved himself in illegal activities i.e in the illegal smuggling of Arms and ammunitions. In this regard he was arrested red handed from the spot respectively vide FIR No. 110/18, dated 02.12.2018 U/Ss AO14/20/65, AO-12(2)B 20/65, Termimi Ordinance 2015, AO2(A)13/20/65 Termimi Ordinance 2015 and AO 13(2)C 20/65, Police Station Rangu, District Attack and vide FIR No. 246 dated 22.05.2020 U/Ss 15-17 AA Police Station Risalpur, District Nowshera . (Copy of FIR attached herewith as annexure "A").
2. Incorrect. The appellant was enlisted in the year 2016 as constable. However, he being a member of discipline force involved himself in the above stated illegal activities. Besides, perusal of his service record reveals that there are 08 bad entries with no good entry in his credit.
3. Incorrect. As the appellant involved himself in criminal case vide FIR No. 110/18, dated 02.12.2018 U/Ss AO14/20/65, AO 12(2)B 20/65, Termimi Ordinance 2015, AO2(A)13/20/65 Termimi Ordinance 2015 and AO 13(2)C 20/65, Police Station Rangu, District Attack. Therefore, he was placed under suspension and closed to Line and proper departmental enquiry was initiated

against him. However, his enquiry was kept pending till the decision of the criminal case by the competent authority. However, it is pertinent to mention here that in the meanwhile the appellant involved himself in the same nature case i.e in the smuggling of Arms and ammunition, to which he was arrested red handed from the spot vide FIR No. 246, dated 22.05.2020 U/S 15-17 AA, Police Station Risal pur District Nowshera. (Copy of FIR attached herewith as annexure "B").

4. Incorrect. The appellant was released on bail, but later on he again involved/charged in the same nature criminal case vide Daily Diary report No. 05, dated 23.05.2020, which shows that the appellant is a habitual/professional smuggling of Arms and ammunitions. (Copy of DD report is attached as annexure "C")
5. Incorrect. After released on bail, the appellant was again involved himself in the same nature criminal case vide FIR No. 246, dated 22.05.2020 U/S 15-17 AA, Police Station Risal pur District Nowshera, which he was arrested by the local police from the spot with red handed. Hence his enquiry was re-opened, which the appellant was called and heard in person, but he failed to advance any cogent reason regarding to his innocence. Thus after fulfillment of all codal formalities the appellant was dismissed from service.
6. Incorrect. The appellant trying to mislead this honorable Tribunal. In fact the appellant failed to submit departmental appeal before the respondent No. 03.
7. Incorrect. The appellant failed to submit any application in response of departmental appeal.
8. 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.

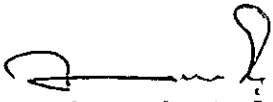
GROUND:-


- A. Incorrect. The respondents have not deprived the appellant from his legal rights.
- B. Incorrect. The order dated 06.06.2020 is legally justified and in accordance with law/rules as the same was passed by the competent authority after fulfillment of due codal formalities required as per law.
- C. Incorrect. On the allegations of involvement in criminal case the appellant was issued Charge Sheet alongwith Summary of Allegations and Enquiry Officer was nominated. After completion of enquiry, the Enquiry Officer submitted his finding report. Upon the finding of Enquiry Officer, he was issued/served with Final Show Cause Notice to which he replied. (Copies of Charge Sheet, Final Show Cause Notice and his replies attached herewith as annexure D,E,F, & G).


- D. Incorrect. Proper departmental enquiry has already been initiated against him as per law/rules. (Copy of enquiry report attached herewith as annexure **A**).
- E. Incorrect. Earlier the enquiry against the appellant was kept pending by the competent authority, however, the appellant did not mend his way and in the meanwhile he again involved himself in the same nature criminal case, which he prove himself as a habitual and professional armed and ammunitions smuggler. Hence his enquiry file was re-opened as he was called and heard in person, but he failed to present any justification regarding to his innocence. Thus the appellant is found a livid stigma on the face of Police Department and in this circumstance his more retention in the disciplined force is further embolden the appellant, while impinge upon adversely of overall discipline and conduct of the force. Therefore, after fulfillment of all codal formalities, he was awarded major punishment of dismissal from service.
- F. Incorrect. Proper and sufficient opportunity at every level of defense absolutely provided to the appellant as per law/rules, but he failed to prove himself innocent.
- G. 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,
Kohat Range, Kohat
(Respondent No. 02)


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


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)

ابتدائی اطلاع رپورٹ

گفتنی افصحان آسی
۰۳۱۹۹۰۳۷۹۶۷

بتاریخ اطلاع است جرم قابل دست اندازی پولیس رپورٹ شد و رپورٹ نمبر ۱۵۲ مجموعہ ضابطہ تجدیدی

ملع	تاریخ	وقت	محل وقوع
پشاور	۲۲/۱۱/۸۱	۲۲:۰۵	۱۳۰۰
مقام	تاریخ	وقت	محل وقوع
پشاور	۲۲/۱۱/۸۱	۲۲:۰۵	۱۳۰۰
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مقام	تاریخ	وقت	محل وقوع
پشاور	۲۲/۱۱/۸۱	۲۲:۰۵	۱۳۰۰

آپ کی اطلاع کے مطابق...

مقامی پولیس اسٹیشن...

پشاور...

۲۲/۱۱/۸۱...

۱۳۰۰...

ملاحظات

ابتدائی اطلاع کے مطابق...

مقامی پولیس اسٹیشن...

پشاور...

۲۲/۱۱/۸۱...

۱۳۰۰...

۱۹۳۰۱-۵۸۳۱۱۵۳-۹

۷۳۳۳۹۰۷۴

۲۲۴۰۱-۷۴۸۸۱۳-۱

۶۵۳۲-۲۳۹۳۰۰۰

Arrested

[Handwritten Signature]

۵۱-۵۱-۵۱

No. 565 /PA/FRPDated 06 / 12 /2018CHARGE SHEET

- i) I, Arshad Mehmood, SP FRP Kohat as competent authority, am of the opinion that you Constable Asad Ullah No. 5418 of FRP Platoon No. 119 deputed for security duty at Kohat Jail Guard, have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.
- a) It has been reported against you vide DD No.03 dated 02.12.2018 that you, have absented yourself w.e.f 02.12.2018 without any leave or prior permission of the competent authority and have not reported back till date. Thus you have committed a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules 1975 and have rendered yourself liable to be proceeded against departmentally.
- ii). By reason of the above. you seem to be guilty as sufficient material is placed before the undersigned; therefore it is decided to proceed against you in general police proceeding.
- iii). You are; therefore, required to submit your written reply within 07 days of the receipt of this charge sheet to the Inquiry Officer.
- iv). Your written reply, if any, should reach the Inquiry Officer within specific period, failing which it shall be presumed that you have no defense to offer and in that case, ex-parte action shall follow against you.
- v). Intimate as to whether you desire to be heard in person or not?
- vi) A statement of allegation is enclosed.

Superintendent of Police, FRP.
Kohat Range, Kohat

M. Asad Khan
24/12/18

Arrested
[Signature]


"C/A"


DISCIPLINARY ACTION

I, Arshad Mehmood, SP FRP Kohat as competent authority, am of the opinion that you Constable Asad Ullah No. 5418 of FRP Platoon No. 119 deputed for security duty at Kohat Jail Guard,, have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.

STATEMENT OF ALLEGATION

1. It has been reported against you vide DD No.03 dated 02.12.2018 that you have absented yourself w.e.f 02.12.2018 without any leave or prior permission of the competent authority and have not reported back till date. Thus you have committed a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules 1975 and have rendered yourself liable to be proceeded against departmentally.
2. For the purpose of scrutinize the conduct of said Constable with reference to the above allegations, Noor Ullah Khan DSP FRP Kohat is appointed as inquiry officer.
3. The inquiry officer shall conduct proceeding in accordance with provision of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record it is finding and make with twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official.
4. The delinquent official shall join the proceeding on the date, time and place fixed by the officer.


 Superintendent of Police, FRP
 Kohat Range, Kohat

Attested


کہ ضرور جواب الیوم - پی مہاراج الیوم - آر پی کونٹریسٹ ریسیٹ کونٹریسٹ

عنوان - جواب چارج شیٹ

567/PA/FRP
بجوال چارج شیٹ لیری

تاریخ 12-12-18 حسب ذیل طرفین سے -

- ۱- یہ کم عدیم عبد الوہاب داروہا جی ٹی سکنہ درہ آدم خیل میرا رشتہ دار ہے
- ۲- یہ کم عدیم عبد الوہاب کی دائرہ بیمار تھی - اور راولپنڈی میں
اپنی اپنی کے گھر زیر علاج تھی -
- ۳- یہ کم عدیم عبد الوہاب نے حجے بنایا - کم وہ اپنی دائرہ کے لئے
کچھ ضروری سامان خریدنا چاہتا ہے - ساتھ ہی حجے ہمراہ
جانے کو کہا -

۴- یہ کم عدیم رشتہ دار (میر) نے ہمراہ جانے کی حالت میں ہے -

۵- یہ کم عدیم بذریعہ موٹر کار کونٹریسٹ سے روانہ ہو کر راستے میں پولیس
نے روک کر موٹر کار میں موجود بیگ، بیگ میں رکھا ہوا سامان
دیکھ کر اشتباہ برپا کر کے -

۶- یہ کم عدیم نے کہا کہ موٹر کار اور بیگ میں کونٹریسٹ
عبد الوہاب نے رکھی تھی -

۷- یہ کم عدیم رشتہ دار عبد الوہاب نے حجے سے دھوکہ کھانے کے وقت میں
پیرا ایٹارنہ روٹ نام لیا ہے -

۸- یہ کم عدیم نے گناہ میں - میرا موٹر کار سے میرا رشتہ دار
تعلق یا واسطہ نہ ہے -

لہذا اس تردید سے کہ حجے چارہ مشہور چارج شیٹ (داخل دفتر کے مطابق)
مخالف حکم صادر فرمادیا جائے -

الحارف
کنٹرول ریسورٹ نمبر 5418 پلاٹ نمبر 119 حال FRP پولیس میں لایا ہوا ہے

Attesten
[Signature]

صاحب DPO جو افسر بحوالہ کنٹریکٹنگ ایجنسی 1452/005 کا ٹیل ایرڈائنڈ 5418 سے متعلق غیر ملکی
تفصیلات وصول ہوئے ہیں۔ صاحب کوہاٹ نے چارج ٹینٹ ہاری
تری 33 PAFRP کیا من کوآپٹواری آفسر مقرر کیا۔
24-1-19

اس سلسلے میں ٹیل ایرڈائنڈ 5418 نے بذات خود جو رقم 25-1-19 کو چارج
ٹینٹ وصول کرتے اور مقررہ وقت 2 دن کے اندر اپنے چارج ٹینٹ کا جواب
جمع نہیں کیا اس سلسلے میں آٹواری آفسر نے سخت نراڈے سلسلے مقرر کیا
جسکے مذکورہ سبیل کو ایسی غیر ملکی سر جو تفصیلات بلڈ لون روزنامہ سے
وصول ہوتے ہیں چوتک چارج ٹینٹ تری 33 PAFRP اور چارج ٹینٹ
تری 565/PAFRP کا غیر ملکی دورا شہر تک نہیں اور چارج ٹینٹ تری
6-12-18

565/PAFRP کی آٹواری صاحب PAFRP کو مارک ملوئی تھی جن میں مذکورہ سبیل
پر چارج ٹینٹ کی تعمیل سبیل 24-12-18 کو فروری تھی اور سبیل مذکورہ
نے چارج ٹینٹ کا جواب جو رقم 26-12-18 کو جمع کیا تھا اس آٹواری میں آٹواری
آفسر نے مذکورہ سبیل کو آٹواری فائڈنگ رپورٹ میں 19 اہم بلڈ شہادہ کرتے سبیل
مقرر کیا تھا مذکورہ سبیل کا غیر ملکی سے متعلق معلوم ہوا کہ ٹیل ایرڈائنڈ
تھامزنگ جہلم ایٹک میں جو رقم 20/65 B (2) A013، A014/20/65
ترجمی آرڈر میں 2015، A02(A)13/20/65 ترجمی ایٹک آرڈر میں 2015
A013 (2) مقدمہ درج رٹری ہوا ہے۔

اس سلسلے میں صاحب DPO صاحب کوہاٹ کی طرف بحوالہ ایٹک کنٹریکٹنگ ایجنسی 26687/9C
جو رقم 6-1-2008 کو وصول ہوئے ہیں۔ صاحب کوہاٹ چارج ٹینٹ
تری 567/PAFRP ہاری کرتے DSF صاحب کوہاٹ کو آٹواری آفسر مقرر کیا۔
12-12-18

ٹیل ایرڈائنڈ چارج ٹینٹ جو رقم 24-12-2018 کو سبیل DSF سے وصول کیا اور جو رقم
26-12-18 کو چارج ٹینٹ کا جواب جمع کیا۔ بددوران آٹواری صاحب DSF
صاحب کا تہادہ لیتا رہا اس پر صاحب PAFRP صاحب کوہاٹ نے
صاحب کو مارک کرتے میں آٹواری آفسر مقرر کیا۔
آٹواری کے تمام کوائزات پورے ہونے کے بعد من تہادہ آفسر

اس سلسلے میں
A.T.O.

Attested
[Signature]

E/2

کینسل ایڈالڈ مر عدالت میں جرم ثابت نہیں ہوا ہے اور کینسل کے اس عدالت
سے لاگت لگتی تھی ظاہر کی ہیں اور مقدم عدالت میں زیر سماعت ہیں۔
لہذا کینسل ایڈالڈ ۱۶ یوم بلڈ سٹوڈیو فرے اور سٹوڈیو کھولنے سے وہیں بحال فرے
اور انکوٹری خود عدالتی مقدمے تک بند تک فرے سب سے فرے سٹوڈیو کھولنا چاہیں انکوٹری
رپورٹ فرے بلڈ فرے فرے ہیں

S/-Hand A

SI FRD
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22. 02. 2019

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FINAL SHOW CAUSE NOTICE


As reported vide DD No. 03 dated 02.12.2018, you **Constable Asad Ullah No. 5418** of FRP Platoon No. 119 posted for security duty at Kohat Jail guard, have remained absent from duty w.e.f 02.12.2018 to 21.12.2018 (total absence period is 19 days).

Accordingly, departmental inquiry was conducted against you through the then DSP FRP Kohat who, in his finding, found you guilty of the charges leveled against you and recommended your absence period to be treated as leave without pay.

NOW, THEREFORE, I, Arshad Mehmood, Superintendent of Police, FRP Kohat Range, Kohat in exercise of the powers vested in me under the Khyber Pakhtunkhwa Police Rules - 1975 hereby call upon you **Constable Asad Ullah No. 5418** through this Final Show Cause Notice to explain your position within 07 days of the receipt of this notice as to why you should not be awarded one or more Major or Minor Punishment as mentioned in Rule (4) of KP Police Rules 1975. In case of non receipt of reply within the stipulated period, an ex-parte action will be taken against you. Also state in writing as to whether you desire to be heard in person or not. Copy of finding reports of Inquiry Officer are enclosed herewith.

No. 39 /PA

Dated 28/01/2019


Superintendent of Police, FRP,
Kohat Range, Kohat

Attested



بجاء نائل شوکار کونسل قری 39/1/19 حوض 28/1/19 خانم

صا - 19/1/19 کو حاکم حضور حضرت یونہی حوض 18-12-2 سے 18-12-21

تک میں غیر حاضر رہا بلوں تکلیف پر غیر حاضر یا بااثر تحریری بلوں سے

کیونکہ میں ایک رشتہ دار کنبہ نو راؤ کنبہ دی جا رہا تھا اور راستے میں

لوگوں نے جھگڑے کے دوران میرے رشتہ دار کے گاڑی سے

بدواریں تلہ میں ایک بیگ حاصل کیا جس میں بقول لوگوں بیگ

میں اسلحہ ہے اور اسلحہ میں تے دیکھا ہی نہیں ہے مجھے اپنے

رشتہ دار کے ساتھ تھانہ لے گیا اور مجھے وہاں پتہ چلے کہ مجھے

جھا 19/1/19 میں حکومت ٹھہرا گیا ہے چونکہ میں اس بات

سے لاعلم تھا اور اب میرا مقدم عدالت میں زیر سماعت میں

میری بے گناہی عدالت میں ثابت کرنا میرا کوئی دوسرا ذریعہ

بھانٹ نہیں ہیں اور اب میں حضور بن چکا ہوں۔ لہذا اس

سائل اس مقدمہ میں بے گناہ ہے آ رہا سائل کو عدالت نے گتیار

ٹھہرا گیا تو آپ صاحبان جو سزا مجھے دینا چاہتے ہیں۔ تو

وہ مجھے منظور ہیں۔ استدعا ہے کہ سائل کی آگاہی

عدالتی نمبر تک پہنچانے کے لئے کا حکم صادر فرمائیں سائل ناچاری

M. Asad
15-02-19

Attested

Handwritten signature

ORDER

47

My this order will dispose off departmental inquiry conducted against Constable Anad 5418 FRP Platoon No. 119 under Khyber Pakhtunkhwa Police Disciplinary Rules - 1975 (Amended in 2014).
Brief facts are that, as reported vide DD No. 03 dated 02.12.2018, he had absented him duty w.e.f 0212 2018 without any leave or prior permission of the competent authority. To this effect proceeded against departmentally through the then DSP FRP Kohat. During his absence period, he was reported DPO Kohat vide his office letter No. 26687/GC dated 06.12.2018 to be involved/arrested in case FIR No. dated 02.12.2018 U/Ss AO14/20/65, AO 13(2)B 20/65 Termimi Ordinance 2015, AO2(A)13/20/65 Ordinance 2015 and AO 13 (2)C 20/65 P S Rangu District Attack.


In this regard, he was placed under suspension vide this office OB No. 996 dated 10.12.2018. A separate departmental enquiry was initiated against him through same enquiry officer who, on being transferred from this Range to CCP Peshawar made a written request to further marked the enquiries to another enquiry officer. Thereafter the same enquiry were marked to the then LO FRP Kohat who, in his finding, submitted that the enquiries against the alleged official are relevant inter se and consolidated them into one enquiry. He submitted that the alleged official has already been released on-bail vide Senior Civil Judge (CPL Division) order dated 17.12.2018 and reported back for duty on 21.12.2018.

In the light of finding of E.O, he was called in OR and heard in person. As he was released by the above learned court, the said enquiry was kept pending till the decision of court.

However he has been again charged/arrested in the same nature case vide FIR No. 246 dated 22.05.2020 U/Ss 15-17AA P.S Risalpur District Nowshera as reported vide DD No. 05 dated 23.05.2020. It shows that the said constable is habitual/professional smuggler of Arms & Ammunitions and does not show any change in his trend.

Service Record, perused which revealed that he was appointed as constable on 26.12.2016 in FRP Kohat Range. There are 07 bad entries against him with no good entry in his record.

Hence, keeping in view his previous enquiry and fresh involvement in the case of Arms & Ammunitions I. Sana Ullah, Superintendent of Police, FRP Kohat Range, in exercise of Power vested in me under Rule - 5 (5) of Khyber Pakhtunkhwa Police Rules - 1975 (amended in 2014), I impose on him major punishment of Dismissal from service with immediate effect.


SUPERINTENDENT OF POLICE FRP
KOHAT RANGE, KOHAT

OB No. 471

Dated: 08/06/2020

OFFICE OF THE SUPERINTENDENT OF POLICE, FRP, KOHAT RANGE, KOHAT


No. 109-110 /PA dated Kohat the 08/06/2020

Copy of the above is forwarded to the:-

- The Commandant FRP Khyber Pakhtunkhwa, Peshawar for favour of information
- Pay Officer
- Reader
- OHC for necessary action
- SRC

Attested




SUPERINTENDENT OF POLICE, FRP
KOHAT RANGE, KOHAT

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1640/2022.

**Muhammad Asad Khan, (Ex-constable) S/o Hameed Khan, R/o Togh Bala Payan,
Tehsil & District Kohat.....Appellant.**


VERSUS


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


AFFIDAVIT

We respondents No. 1 to 3 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.

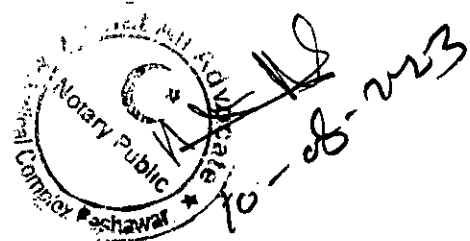
*it is further stated on oath that in this appeals -
The answering respondents have neither been
Placed ex-parte their defense is struck off/lost.*


Superintendent of Police FRP,
Kohat Range, Kohat
(Respondent No. 02)


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


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)

ATTESTED



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1640/2022.

Muhammad Asad Khan, (Ex-constable) S/o Hameed Khan, R/o Togh Bala Payan, Tehsil & District Kohat.....Appellant.


VERSUS


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

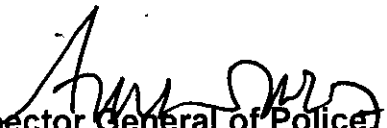
AUTHORITY LETTER

Respectfully Sheweth:-

We respondents No. 1 to 3 do hereby solemnly authorize Mr. Ghassan Ullah ASI 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,
Kohat Range, Kohat
(Respondent No. 02)


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


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)