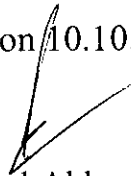



31st July, 2023

1. Clerk of counsel for the appellant present. Mr. Muhammad Jan learned District Attorney alongwith Khyal Roz, Inspector (Legal) for the respondents present.

2. Clerk of counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy before MTI Tribunal. Adjourned. To come up for arguments on 10.10.2023 before D.B. P.P given to parties.

RECORDED
31ST JULY
2023
Peshawar


(Muhammad Akbar Khan)
Member (E)


(Rashida Bano)
Member (J)


28th Feb. 2023

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief for arguments. Adjourned. To come up for arguments on 11.05.2023 before the D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member(E)


(Salah-ud-Din)
Member (J)

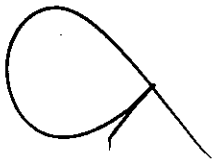
11th May, 2023

1. Clerk of counsel for the appellant. Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.

2. Counsel are on strike, therefore, the case is adjourned. Office is directed to notify the next date on the noticeboard as well as on the website. To come up for arguments on 31.07.2023 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar



(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

10.10.2022

Appellant present in person. Mr. Kabir Ullah Khattak,
Additional Advocate General for respondents present.

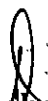
Reply on behalf of respondents not submitted. Learned
Additional AG seeks time to contact the respondents for
submission of written reply/comments. Adjourned. To come up for
written reply/comments on 24.10.2022 before S.B.


(Fareeha Paul)
Member (E)

24th Oct., 2022

Clerk of counsel for the appellant present. Kabirullah
Khattak, Addl. AG for respondents present.

Reply/comments on behalf of respondents have been
submitted which are placed on file. To come up for
rejoinder/arguments on 01.12.2022 before the D.B.


(Fareeha Paul)
Member(E)

01/12/22

*Deleted from the list to come
up on the next date 28/2/23*

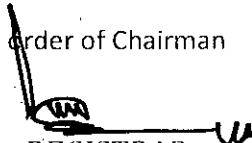

Reader

FORM OF ORDER SHEET

SCANNED
KPST
Peshawar

Court of _____

Case No.- 1285/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/09/2022	<p>The appeal of Mr. Muhammad Kamal Khan resubmitted today by Syed Noman Ali Bukhari Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>5-9-22</u> Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR - U</p>
	05.09.2022	<p>Appellant present through counsel.</p> <p>Preliminary arguments heard and record perused.</p> <p>Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 10.10.2022 before S.B .</p>

Rs-100/-
Appellant Deposited
Security & Process Fee


9/9/22



(Rozina Rehman)
Member (J)

The appeal of Mr. Muhammad Kamal Khan Ex-Constable 6429 received today i.e. on 02.09.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of departmental appeal is not attached with the appeal which may be placed on it
- 2- Annexures-I & J of the appeal are illegible which may be replaced by legible/better one.

No. 2506 /S.T,

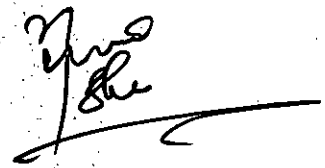
Dt. 2/9 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Noman Ali Bukhari Adv. Pesh.

Resubmitted

- > copy of departmental appeal is not available with the appellant as mentioned in para 5 of appeal.
- > better copies of annex are enclosed



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1285 /2022

Muhammad Kamal Khan

V/S

Police Deptt:

INDEX

S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	1-6
2.	Copy of charge sheet	-A-	07-08
3.	Copy of letter	-B-	09
4.	Copy of suspension order	-C-	10
5.	Copy of show cause	-D-	11
6.	Copy of enquiry finding	-E-	12-13
7.	Copy of charge sheet & reply	-F-	14-15
8.	Copy of inquiry	-G-	16-17
9.	Copy of showcause	-H-	18
10.	Copy of impugned order	-I-	19
11.	Copy of rejection order	-J-	20
12.	Vakalt nama	-----	21


APPELLANT

Muhammad Kamal Khan

THROUGH:


(SYED NOMAN ALI BUKHARI)

ADVOCATE, HIGH COURT

PESHAWAR

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2022

Muhammad Kamal Khan, EX- Constable, 6429,
SSU (CPEC), CCP Peshawar.

.....(Appellant)

VERSUS

1. The Inspector General of Police, KPK, Peshawar.
2. The Deputy Inspector General of Police, Operation & SSU (CPEC) KP, Peshawar.
3. The Superintendent of Police Admin/HQrs, SSU (CPEC), KP, Peshawar.
4. The Superintendent of Police HQrs, KP Peshawar.

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER of DATED 06.08.2021 WHEREBY, THE APPELLANT HAS BEEN DISCHARGE FROM SERVICE AND AGAINST REJECTION ORDER DATED 01/08/2022 RECEIVED ON 04/08/2022.

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 06/08/2021 & 04/08/2022 MAY PLEASE BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED IN TO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

1

FACTS:

Facts giving rise to the present service appeal are as under:


1. That the appellant was appointed as police constable in police deptt and working with full zeal and zest.
2. That the appellant while serving or performing his duties regularly, suddenly fell ill and due to illness and some family problems remained absent from duty. On the basis which respondent no.4 issued charge sheet to the appellant which was properly replied by the appellant. **Copy of the charge sheet is attached as annexure-A.**
3. That, thereafter, the inquiry was conducted against the appellant. And after the inquiry the appellant was suspended by the incompetent authority (DIG) vide order dated 13.01.2021 and showcause notice was issued to the appellant but the same was not served upon the appellant. Thereafter, the enquiry officer conducted ex-Partee enquiry without summoning appellant. **Copy of letter, suspension order, show cause notice and inquiry finding are attached as annexure-B, C, D & E.**
4. That thereafter another charge sheet was issued by respondent no 3 which is properly replied by the appellant. Thereafter the inquiry was conducted and the inquiry officer wrote that the appellant produce medical report but without knowing the authenticity of the medical report the inquiry officer gave his opinion. Thereafter the final show cause notice was issued. And the appellant was discharge from service under police rules 1975.. **Copy of the charge sheet, reply, inquiry report, show cause and order is attached as annexure-F, G, H & I.**
5. That thereafter, the appellant filed departmental appeal, but the copy of the same is not available with the appellant may be requisite from the deptt.: Which was rejected by the incompetent authority vide order dated 01/08/2022 received on 04/08/2022. **(Copy of rejection order is attached as Annexure- J).**

GROUNDS:


- A) That the impugned orders dated 06-08-2021 & 01/08/2022 are against the law, facts, norms of justice and void-ab-initio as has been passed by Incompetent Authority and material on record, therefore not tenable and liable to be set aside.
- B) That the charge sheet issued by the respondent no.4 and impugned order was passed by respondent no.3 which was void in the eye of law, according to Superiors Court Judgment reported as 2007 PLC (cs) 85 and 2007 PLC (cs) 132. So the whole procedure and order is void-ab-initio cannot be sustained in the eye of law and liable to be set aside.
- C) That according to Supreme Court judgment when disciplinary proceeding initiated by the incompetent authority then the whole superstructure fall down automatically. The proceeding was initiated by the incompetent authority against the appellant. So liable to be set-aside.
- D) That the appellant has been condemned unheard which is violation of 'Audi Alterum Paltrum' and has not been treated according to law and rules.
- E) That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on this score alone.
- F) That the departmental appeal of the appellant was also rejected by the incompetent authority. So on this score alone the order may be set-aside.
- G) That the medical certificated must be referred to medical board to examine and dig out the truthfulness on the medical certificated but the deptt failed to follow this process and therefore it is requested the case may be remanded to deptt to conduct denovo enquiry by providing full opportunity to the appellant to meet the end of justice.
- H) That according to judgment of the superior court and the Service Tribunal the penalty awarded to the appellant is not included in the list of penalty provided in Police Rules 1975. So, the appellant is also entitled to the same relief which is granted to other appellant by the Hon'able Tribunal Peshawar in appeal Hazrat Ali vs Police Deptt and other similar appeal.

- I) That no chance of personal hearing was provided to the appellant and as such the appellant has been condemned unheard throughout.
- J) That the appellant is young and efficient but due to some serious problems he can't complete he recruit course, the department taken so harsh view, may kindly be taken lenient view and re-instate the appellant in to service.
- K) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

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


APPELLANT
Muhammad Kamal Khan

THROUGH:


(SYED NOMAN ALI BUKHARI)
ADVOCATE, HIGH COURT
PESHAWAR

4

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL NO. _____/2022

Muhammad Kamal Khan

V/S

Police Deptt:


CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.



DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE
3. Any other case law as per need.


APPELLANT
Muhammad Kamal Khan

THROUGH:


(SYED NOMAN ALI BUKHARI)
ADVOCATE, HIGH COURT
PESHAWAR

5 6

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL NO. _____/2022

Muhammad Kamal Khan

V/S

Police Deptt:

AFFIDAVIT

I, Muhammad Kamal Khan (Appellant), do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honourable Tribunal.

DEPONENT



Muhammad Kamal Khan

CHARGE SHEET

I, Superintendent of Police, Headquarters, Capital City Police Peshawar, as a competent authority, hereby, charge that Recruit Constable Muhammad Kamal No.6929 of Capital City Police Peshawar with the following irregularities.

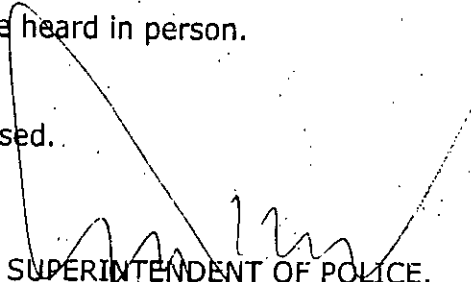
"It has been reported by Commandant PTC Hangu vide signal No.1827-29/GC dated 28.10.2020 that you Recruit Constable Muhammad Kamal No.6929 while deputed for basic recruit training at PTC Hangu returned as unqualified & also absent from duty for 27-days without taking permission or leave. This amounts to gross misconduct on your part and is against the discipline of the force."

You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the Enquiry Officer committee, as the case may be.

Your written defence, if any, should reach the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that have no defence to put in and in that case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person.

A statement of allegation is enclosed.


SUPERINTENDENT OF POLICE,
HEADQUARTERS, PESHAWAR

(S)
(F)

69/E
19-11-2020

DISCIPLINARY ACTION

I, Superintendent of Police, Headquarters, Capital City Police Peshawar as a competent authority, am of the opinion that Recruit Constable Muhammad Kamal No.6929 has rendered him-self liable to be proceeded against under the provision of Police Disciplinary Rules-1975

STATEMENT OF ALLEGATION

"It has been reported by Commandant PTC Hangu vide signal No.1827-29/GC dated 28.10.2020 that Recruit Constable Muhammad Kamal No.6929 while deputed for basic recruit training at PTC Hangu returned as unqualified & also absent from duty for 27-days without taking permission or leave. This amounts to gross misconduct on his part and is against the discipline of the force."

For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and SDPO CITY I is appointed as Enquiry Officer.

2. The Enquiry Officer shall, in accordance with the provisions of the Police Disciplinary Rules, 1975, provide reasonable opportunity of hearing to the accused officer, record his finding within 30 days of the receipt of this order, make recommendations as to punishment or other appropriate action against the accused.
3. The accused shall join the proceeding on the date time and place fixed by the Enquiry Officer.


SUPERINTENDENT OF POLICE,
HEADQUARTERS, PESHAWAR

No. 263 /E/PA, dated Peshawar the 16/11 /2020

1. SDPO CITY I is directed to finalize the aforementioned departmental proceeding within stipulated period under the provision of Police Rules-1975.
2. Official concerned.

B (9)

**OFFICE OF THE
DEPUTY SUPERINTENDENT OF POLICE,
CITY SUB-DIVISION, PESHAWAR.**

3508 Peshawar the 4/12/2020.


To: Deputy Superintendent of Police,
Home Quarter, Peshawar.

Subject: DISCIPLINARY ENQUIRIES.

Memorandum
Please refer to your office letter No. 260/E/PA, dated 16-11-2020 and letter No. 263/E/PA, dated 16-11-2020. (attached in original).

It is stated that the following enquiries is return herewith without proceeding, because of wrong belt numbers. edp

S.No	Rank & Name
1.	Constable Sundar Wali No.6474 /CPCC
2.	Constable Muhammad Kamal No.6929 CPCC


Deputy Superintendent of Police,
City Sub-Division, Peshawar.

The officer has been recruited in CPCC as
workup in police lines

S/O / DSP-City

PA
04/12/20



OFFICE OF THE
SPECIAL SECURITY UNIT (CPEC)
KHYBER PAKHTUNKHWA POLICE,
PESHAWAR

Ph: 091-9211067 Fax 091-9213165, Email: ssu.cpec@gmail.com

No. 172-76/OHC/HQrs. dated Peshawar the 13/01/2021

ORDER

Constable Kamal No. 6429 of SSU (CPEC), CCP Peshawar absented himself from his lawful duty w.e.f 18.11.2020 till date without taking any leave or permission from competent authority, received vide SP Hqrs. CCP Peshawar letter No. 255/PA dated 01.01.2021. Therefore, he is placed under suspension, pay stopped & direct him to collect his SCN from this office.

Amir Muhammad Khan Khadukhel

(AMIR MUHAMMAD KHAN KHADUKHEL)

SP Admin & HQrs. SSU (CPEC)

For Deputy Inspector General, of Police,

Operations & SSU (CPEC)

Khyber Pakhtunkhwa

Copy for information to the:

1. Worthy DIG Ops & SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
2. SP Hqrs. CCP Peshawar.
3. Accountant HQrs. SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
4. RI HQrs. SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
5. SRC HQrs. SSU (CPEC), Khyber Pakhtunkhwa Peshawar.

41
13.01.2021

SHOW CAUSE NOTICE

(Under Rule 5 (3) K.P.K Police Rules, 1975)

D 11

As Ordered, I Superintendent of Police Admin & HQrs. SSU (CPEC), Peshawar, as competent Authority hereby serve upon you **Constable Kamal No. 6429** of SSU (CPEC) Peshawar.

While Posted at SSU (CPEC) CCP Peshawar you were remained absent from your full duty w.e.f. 18.11.2020 till date without taking any leave or prior permission from competent authority received vide SP Hqrs. CCP Peshawar letter No. 255/PA, dated 11.12.2021.

- 1) Therefore I, Superintendent of Police Admin & HQrs. SSU (CPEC), Peshawar, as Competent Authority have tentatively decided to impose upon you major/minor penalty including dismissal from the service under police rules.
- 2) You are therefore, required to show cause & explain your position as to why penalty should not be imposed upon you.
- 3) If no reply to Show Cause Notice is received within the (07) seven days of its receipt, it shall be presumed that you have no defense to put in and consequently ex-parte action shall be taken against you.

(Signature)
(AMIR MUHAMMAD KHAN KHADUKHEL)
 SP Admin & HQrs. SSU (CPEC)
 Khyber Pakhtunkhwa
 Peshawar

171 OHC/HQrs. dated Peshawar the 13/01/2021
 Copy of the above is forwarded for information to the worthy DIG Ops/SSU
 2), Khyber Pakhtunkhwa Peshawar.

(Signature)
 20-1-2024
 17301-0482645-3
 0330-9269904-
 0313-9933096-مدل بجائی

صواب کا
 کنسٹیبل کمال 6429 سے کئی روزوں سے
 غائب ہوئے ہیں اور اسے کوئی اطلاع نہیں دی
 گئی۔ اس کے بارے میں سیکرٹری اور دیگر افسران
 کو اطلاع کی گئی ہے۔ 0313-9933096 پر
 اطلاع کی گئی ہے کہ اسے کوئی اطلاع نہیں
 دی گئی۔
(Signature)
 OHC/SSU
 18/2/21

E (12)

(1)

**ENQUIRY U/R 6(5) OF POLICE RULES 1975, AGAINST
RECRUIT CONSTABLE MUHAMMAD KAMAL NO. 6929.**

The enquiry in hand was referred to this office to ascertain the misconduct, committed by the subject accused Recruit Constable vide order of enquiry No. 263/E/PA, dated 16-11-2020.

Short facts are that accused Recruit Constable Muhammad Kamal No. 6929 while deputed for basic recruit training at PTC Hangu returned as unqualified & also absent from duty for 27-days without taking permission or leave. This amounts to gross misconduct on his part and is against the discipline of the force.

In this regard, summons was issued to RI, Police Lines and OSI, Police Lines but the said constable was found as untraced. However from the perusal of the Commandant PTC Hangu signal vide No. 1827-29/GC, dated 28-10-2020, it is found that Muhammad Kamal No. 6929 is on serial No. 11 who belongs to District Nowshehra (Photocopy attached).

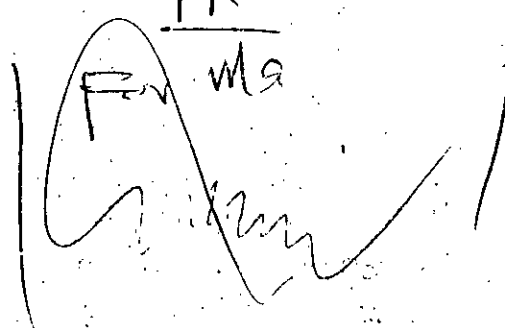
Keeping in view of the aforementioned record, the enquiry in hands is submitted for perusal and necessary orders, please.


22/01/2021
Deputy Superintendent of Police,
City Sub-Division, Peshawar.

Worthy Superintendent of Police,
Head Quarters, Peshawar.

No. 69 /E/St, dated Peshawar the 23/01/2021.

OSI
For report
PA

PA
MA




38
29/01/21

13

**OFFICE OF THE
SUPERINTENDENT OF POLICE,
HEADQUARTERS, PESHAWAR**

Phone No. 091-9210737

No. 661 /PA, Dt: 28/1 /2021

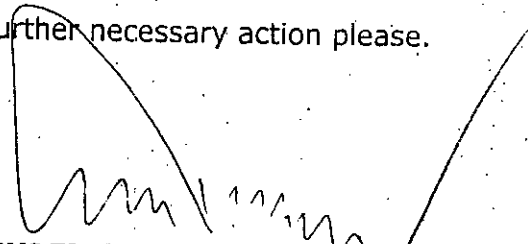
TO: The SP Admn,
Special Security Unit CPEC

Subject: DEPARTMENTAL ENQUIRY FILE AGAINST FC KAMAL NO.6629
OF CPEC

Memo:

The departmental enquiry proceedings against Constable Muhammad Kamal No.6929 of your unit while deputed for basic recruit course at PTC Hangu was returned as unqualified and also marked absent for 27-days vide Signal No.1827-27/GC dated 28.10.2020. Upon which, departmental enquiry was intimated and conducted by SDPO City-I against above named recruit constable.

Now, his departmental enquiry finding along with other related papers containing (11) Pages against Recruit Constable Muhammad Kamal No.6929 are sent herewith (in original) for further necessary action please.


**SUPERINTENDENT OF POLICE
HQRS: PESHAWAR**

F (14)

CHARGE SHEET U/R 6(1) (A) NWFP (NOW KHYBER PAKHTUNKHWA)
POLICE RULES 1975.

You Constable Kamal No. 6429 of SSU (CPEC), District CCP, Peshawar is hereby charged for committing the following Omission/Commissions.

Constable Kamal No. 6429, of SSU (CPEC), District CCP, Peshawar, being remained absented himself from lawful duty w.e.f 18.11.2020 till to date received CCP, Peshawar vide letter No.255/PA dated 01.01.2021 without taking any leave/permission from competent authority.

In this regard a show cause has been issued to you with the letter No.171 dated 13.01.2021, but you failed to submit your reply. Therefore, you are hereby issued with a charge sheet, and called upon to submit your written defence statement against the above charged before the enquiry officer.

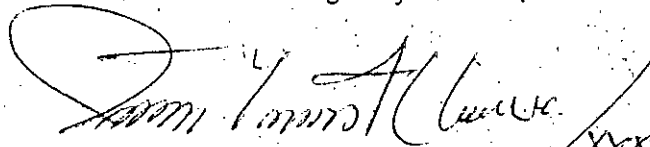
Your reply should reach to the inquiry officer within (07) days from date of receipt of this charge Sheet, failing with ex-part proceeding shall be initiated against you.

SUMMARY/STATEMENT OF ALLEGATION

Constable Kamal No. 6429, of SSU (CPEC), District CCP, Peshawar, being remained absented himself from lawful duty w.e.f 18.11.2020 till to date received CCP, Peshawar vide letter No.255/PA dated 01.01.2021 without taking any leave/permission from competent authority.

In this regard a show cause has been issued to you with the letter No.171 dated 13.01.2021, but you failed to submit your reply. Therefore, you are hereby issued with a charge sheet, and called upon to submit your written defence statement against the above charged before the enquiry officer.

Your reply should reach to the inquiry officer within (07) days from date of receipt of this charge Sheet, failing with Ex-part proceeding shall be initiated against you.


(AMIR MUHAMMAD KHAN KHADUKHEL)
SP Admin/HQrs, SSU (CPEC)
Khyber Pakhtunkhwa Peshawar

Received today
12-4-2021



0332-9268824

15

The Superintendent of Police

Admin HQRS. SSU (CPEC)

Khyber Pukhtunkhwa Peshawar

Subject: Reply to charge sheet no. dated Nil.

R/SIR,

With profound respect it is submitted that during the fateful period I was suffering from typhoid. That due to some grudges with our opponents in our village I along with other family members was out of our residence i.e why I could not inform the concerned authority in time about my sickness. that when my health was recovered, I am regularly attending my duties' I have daily taken treatment from a certified doctor, though some of the perceptions are misplaced from me, however, medical perceptions available with me ~~and~~ are attached hereby for your kind/sympathetic concentration.

That I am a poor person having no source of income and this job is my only source of income and my absence from duty is not deliberate.

It is humbly prayed that my charge sheet and other inquiry proceedings may kindly be filed without taking any further action. I should be careful in future.

Yours obediently



Muhammad kamal khan(6429)

13-4-21

SSU (CPEC)

انکوائری رپورٹ

جناب عالی!

بحوالہ مشمولہ کاغذات انکوائری برخلاف کانسٹیبل محمد کمال 6429 (CPEC) SSU ضلع پشاور معروض خدمت ہوں کہ کانسٹیبل مذکورہ بالا CCP پشاور کا بھرتی شدہ اور تعینات تھا۔ کہ کانسٹیبل مذکورہ کہ خلاف بحوالہ چھٹی نمبر PA-255 مورخہ 01-01-2021 دفتر جناب SP/HQrs صاحب پشاور سے نقلذات مد 55 غیر حاضری، مد 28 روز ناچھ 2021-03-17 حاضری موصول ہوئی اور ساتھ ہی درخواست تنخواہ بندش تحریر موصول ہوئی۔ جس پر OHC نے نوٹ شیٹ پٹ اپ کیا اور جناب SP ایڈمن صاحب نے تنخواہ بندش اور ڈیپارٹمنٹل ایکشن تحریر فرمایا۔ مزید جناب DIG صاحب اپریشن نے مذکورہ کو پے سٹاپ، سپینڈ اور ڈیپارٹمنٹل ایکشن آرڈر جاری کیا۔ جناب SP ایڈمن صاحب نے بحوالہ OB نمبر OHC-171 مورخہ 13-01-2021 کو شوکاز نوٹس جاری کیا۔ مورخہ 2021-02-16 کو بذریعہ سرکاری ٹیلی فون OHC نے بذات خود کانسٹیبل مذکورہ کے موبائل پر کئی بار رابطہ کیا لیکن کوئی جواب موصول نہیں ہوا۔ رابطہ نہ ہونے کی صورت میں کانسٹیبل مذکورہ کے بھائی کے فون نمبر 03139933096 جو کہ فرنیچر کالج میں کمپیوٹر ملازم ہے کو مطلع کیا گیا کہ کانسٹیبل مذکورہ کو مطلع کریں کہ اپنا شوکاز نوٹس وصول کریں۔ کانسٹیبل مورخہ 2021-01-21 کو آکر اپنا شوکاز نوٹس خود وصول کیا۔ مگر کانسٹیبل مذکورہ نے شوکاز نوٹس کا جواب ریکارڈ نہیں کرایا۔ مقررہ معیار کے بعد جناب SP/Admin صاحب نے چھٹی نمبر 33-932 مورخہ 2021-03-31 کو چارج شیٹ جاری کیا۔ اور من انسپکٹر فضل معبود خان کو انکوائری انسر مقرر کیا۔ کانسٹیبل مذکورہ کو مورخہ 2021-04-01 کو اسکے ذاتی موبائل نمبر 03329269924 پر مطلع کیا گیا کہ اپنا چارج شیٹ وصول کریں۔ کانسٹیبل مذکورہ نے مورخہ 2021-04-12 کو آکر اپنا چارج شیٹ خود وصول کیا اور مورخہ 2021-04-13 کو چارج شیٹ کا تحریری بیان ریکارڈ کرایا اور ساتھ ہی پرائیوٹ میڈیکل کاغذات پیش کئے۔ جناب SP/HQrs صاحب پشاور نے برخلاف کانسٹیبل مذکورہ بحوالہ چھٹی نمبر-661 PA موصول ہو کر تحریر ہے کہ کانسٹیبل مذکورہ بحوالہ OB نمبر HC-1827-29 ٹکمانڈنٹ PTC ہنگو نے 27 یوم غیر حاضری پر ان کو ایفائیڈ کر کے مورخہ 2020-11-13 کو ضلع واپس کیا تھا۔ جملہ کاغذات انکوائری کل (11) صفحات بمعہ کورنگ لیٹرف ہیراہ انکوائری ہذا ہے۔

بلسلہ انکوائری معلوم ہوا کہ کانسٹیبل مذکورہ کو 27 یوم غیر حاضری پر کمانڈنٹ PTC ہنگو نے مورخہ 2020-11-13 کو ضلع واپس کیا تھا مورخہ 2020-11-18 تا 2021-03-17 تک غیر حاضر تھا چونکہ اب معلوم ہوا کہ مورخہ 2021-03-29 سے کانسٹیبل مذکورہ بدستور غیر حاضر ہے۔ LO محرر لائن کو تحریری پروانہ جاری کیا۔ پروانے کے پشت پر محرر سٹاف نے تحریر کیا ہے کہ کانسٹیبل مذکورہ کو بحوالہ مد 25 روز ناچھ 2021-03-29 سے بدستور غیر حاضر ہے۔ پروانہ واپس ارسال ہے۔ جولف انکوائری ہذا ہے۔ جو کہ محرر سٹاف کا ریکارڈ تصور ہے۔

PTC

خلاصہ بیان:

17

کانشیل محمد کمال 6429 (CPEC)SSU ضلع پشاور نے اپنے تحریری بیان میں وجہ غیر حاضری فیملی مسئلہ ظاہر کیا ہے۔ بیماری کی نسبت فاروقی دو خانہ کے کاغذات پیش کیے ہیں اور تحریر کیا ہے کہ ایک غریب گھرانے سے تعلق رکھتا ہے اور نوکری کرنے کی خواہش ظاہر کی ہے۔

رائے انکوائری افسر:

کی گئی انکوائری اور میسر شدہ ریکارڈ سے معلوم ہوا کہ ریکورڈ کانشیل محمد کمال 6429 ضلع پشاور محکمہ پولیس میں مورخہ 31-12-2019 کو (CPEC)SSU کا بھرتی شدہ ہے۔ جبکہ 4 مئی 2019ء زیر انکوائری غیر حاضر ہے۔ کانشیل مذکورہ نے جو بیان ریکارڈ کر دیا ہے میں بحیثیت انکوائری افسر اس کے اس بیان سے متفق نہیں ہوں۔ کیونکہ محکمہ پولیس ایک ڈسپلن فورس ہے اور قواعد اور ضوابط موجود ہے۔ مگر 4 مئی غیر حاضری، جبکہ PTC ہنگو سے 27 یوم غیر حاضری علیحدہ اور مورخہ 29-04-2021 سے پھر بدستور غیر حاضر ہے۔ کانشیل مذکورہ ایک عادی غیر حاضر باش ہے اور اس سے مستقبل کے ایک اچھے پولیس افسر بننے کی امید نہیں کی جاسکتی۔ اور محکمہ پولیس میں نوکری کرنے کا ارادہ نہیں رکھتا۔ اور کانشیل مذکورہ کو محکمہ پولیس سے علیحدہ کرنے کی سفارش کی جاتی ہے۔ مگر افسران بالا کا حکم افضل ہے انکوائری رپورٹ گزارش ہے۔

المذہب - 4 - 02
انکوائری افسر (CPEC)SSU

ہیڈ کوارٹر پشاور

Assesed Final SCN
[Signature]
vi / iv / XXI

H (18)

FINAL SHOW CAUSE NOTICE

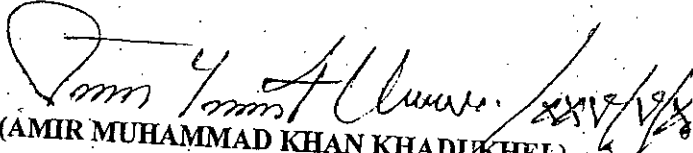
(Under Rule 5 (3) K.P.K Police Rules, 1975)

I Superintendent of Police Admin & HQrs. SSU (CPEC), Peshawar, as Competent Authority hereby serve upon you **Constable Kamal No. 6429** of SSU (CPEC) CCP Peshawar.

That consequent upon the completion of the Inquiry conducted against you by Enquiry Officer Inspector Fazle Mabood Khan of SSU (CPEC) for which you were given full opportunity of hearing. Ongoing to the findings/recommendations of the inquiry officer the material available on record and other connected papers. I am satisfied that you have committed the following acts/omissions per police rules 1975.

While Posted at SSU (CPEC) CCP Peshawar you were remained absent from your lawful duty w.e.f. 18.11.2020 upto 17.03.2021 (119 days) and once again from 29.03.2021 till date (119 + 58 = 177 days up till now), without taking any leave or prior permission from the competent authority received vide SP Hqrs. CCP Peshawar letter No. 255/PA, dated 01.01.2021.


- 1) Therefore I, Superintendent of Police Admin & HQrs. SSU (CPEC), Peshawar, as Competent Authority have tentatively decided to impose upon you major/minor penalty including dismissal from the service under police rules.
- 2) You are therefore, required to show cause & explain your position as to why penalty should not be imposed upon you.
- 3) If no reply to Show Cause Notice is received within the (15) fifteen days of its receipt, it shall be presumed that you have no defense to put in and consequently ex-parte action shall be taken against you.


(AMIR MUHAMMAD KHAN KHADUKHEL)

SP Admin & HQrs. SSU (CPEC)
Khyber Pakhtunkhwa
Peshawar


No. 1799 OHC/HQrs. dated Peshawar the 26/05/2021

Copy of the above is forwarded for information to the worthy DIG Ops/SSU (CPEC), Khyber Pakhtunkhwa Peshawar.

Received  23-6-21

Discharged from service for the period of absence treated as without pay, the acctt. SSU Hqrs. must reckon and recover the amount of paid during the absence.

6429 کمال


12/8/21

I 19



OFFICE OF THE
SPECIAL SECURITY UNIT (CPEC)
KHYBER PAKHTUNKHWA POLICE,
PESHAWAR

Ph: 091-9211067 Fax 091-9213165, Email: ssu.cpec@gmnl.com

No. 3043-48 HQs/SSU/ dated Peshawar the 06/08/2021

ORDER

This office order will dispose the formal departmental enquiry against Recruit Constable Muhammad Kamal No. 6429 of Special Security Unit (CPEC), CCP Peshawar.

Brief facts of the case are that the Recruit Constable Muhammad Kamal No. 6429 absented himself from his lawful duty w.e.f (i) 18.11.2020 till to date received vide SP HQs CCP Peshawar letter No. 255/PA, dated 01.01.2021.

In this regard, a Note Sheet was presented before DIG Ops and SSU (CPEC), where he passed the remarks pay stopped, suspended and for departmentally inquiry. The accused Constable placed under suspension, pay stopped and issued SCN vide this office order No. 172-76/2020/CCP dated 13.01.2021, which was received by the Constable himself. He was summoned again and again but he did not feel bother to submit his reply. An enquiry file consisting 11 pages received from SP HQs CCP Peshawar vide letter No. 661/PA, dated 28.01.2021, where the constable had repatriated to his home from PTC Hangu for 27 days absence without taking any prior permission or leave from competent authority, requesting for further necessary action. Therefore, he was issued with a Charge Sheet vide his office order No. 932-33, dated 31.03.2021 and Fazle Mabood Khan was nominated as Enquiry Officer. During the course of inquiry it was reported that he made his arrival vide DD report No. 28 dated 17.03.2021 and absented himself once again w.e.f. 29.03.2021 till to date vide DD report No. 2 received from LO CCP Peshawar. Charge Sheet was received by the constable himself on date 12.04.2021 and submitted his reply on dated 13.04.2021 of his illness and produced 06 medical prescriptions from a private Herbal doctor. The constable was enquired thoroughly by the EO and made some cross questions and after proper proceedings the EO submitted his findings report that the accused constable remained absented for 27 days from PTC Hangu, 03 months and 29 days from CCP lines and absented once again w.e.f. 29.03.2021 till to date and recommended him for discharge from service for his deliberately absence because the accused Constable could not submit any cogent reason, therefore he was issued with a final Show Cause Notice vide this office order No. 1799/2020/CCP, dated 26.05.2021, served upon him on 23.06.2021, summoned for statement time and again but he did not take any part in the enquiry proceeding.

Therefore, keeping in view the above facts, recommendation of the EO, the Superintendent of Police Admin and HQs SSU (CPEC) in exercise of the powers vested in me under police rule 197 (amended 2014) hereby awarded him a major punishment of "Discharge him from Service" with immediate effect. The period he remained absent treated as without pay and the accountant must reckon and recover the amount if paid during the absence.

Order announced.

(AMIR MUHAMMAD KHAN KHATTAK)
SP Admin & HQs, SSU (CPEC)
Khyber Pakhtunkhwa, Peshawar

Copy for information to the:

1. Superintendent of Police, Peshawar

J 20



OFFICE OF THE
INSPECTOR GENERAL OF

KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. 1234
Dated Peshawar the 01/08/2022



To: Commandant
Special Security Unit (SSU)
Khyber Pakhtunkhwa, Peshawar

REVISION PETITION

Reference is made to your office Memo No. 4549-31-13-110-SSU dated

The Competent Authority has examined and filed the revision petition
submitted by Dy. IC, Mohammad Kamal No. 6429 of CP-C Unit against the punishment of
a charge from service awarded by SP, Adina & HQ: SSU (CP-C), Khyber Pakhtunkhwa,
Peshawar vide order No. 1011-13-110-SSU dated 06-08-2021, being true and

The applicant may please be informed accordingly

(INDOR AFGHAN)

Registrar
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

[Handwritten signatures and notes, including 'e.A.S.' and 'and report...']

ORIGINAL

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

Service Appeal No. 1285/2022

Muhammad Kamal Khan.Appellant.

Versus

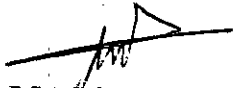
Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar etc

.....Respondents.

INDEX

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1.	Para-wise comments		1-3
2.	Affidavit		4
3.	Authority Letter		5
4.	Copy of order dated 13.01.2021	A	6
5.	Copy of charge sheet dated 31.03.2020	B	7
6.	Copy of order dated 06.08.2021	C	8
7.	Copy of order on revision petition	D	9

Respondents through


MASOOD KHAN
SI/LEGAL: SSU/CPEC,
PESHAWAR.
CNIC: 17101-0392555-1
MOBILE: 0314-9823269

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

Service Appeal No. 1285/ 2022

Muhammad Kamal Khan (Appellant)

VERSUS

Inspector General of Police Khyber Pakhtunkhwa, Peshawar etc
.....(Respondents)

REPLY BY RESPONDENTS NO. 1 TO 4

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:-

- a) That the appeal is not based on facts.
- b) That the appeal is not maintainable in the present form.
- c) That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
- d) That the appeal is barred by law & limitation.
- e) That the appellant is stopped to file the instant Service Appeal by his own conduct.
- f) That the appellant has not come to this Honorable Tribunal with clean hands.
- g) That the appellant has got no cause of action and locus standi to file the instant Service Appeal.

FACTS:-

1. Pertains to service record of the appellant hence no comments.
2. Incorrect. The appellant deliberately absented himself from lawful duty without taking any permission from his superiors which showed his lack of interest while performing official duty. Further added that appellant was under probation so he did not follow the discipline of Police Force.
3. Incorrect. The appellant placed under suspension and served with Show Cause notice vide this office Letter No. 172-76/OHC/HQrs dated 13.01.2021, (Annexure "A") which was received by the appellant himself. He was summoned time and again but he did not feel bother to submit his reply.

4. Incorrect. The appellant was served with charge sheet vide office Letter No. 932-33 dated 31.03.2020 (Annexure "B") and Fazle Mabood Khan was appointed as Enquiry Officer. During the course of enquiry it was reported that he made his arrival vide DD report No. 28 dated 17.03.2021 and absented himself once again w.e.f 29.03.2021. The appellant collected charge sheet by his own and submitted his reply on 13.04.2021, the appellant also produced 06 medical prescriptions from a private Herbal Doctor. The appellant was enquired thoroughly by the Enquiry Officer and made cross questions and after proper proceedings the Enquiry Officer submitted his findings report wherein the appellant was found guilty of misconduct. Further added that the appellant badly failed to provide any plausible reason in his self defense. After fulfillment of all codal formalities he was discharge from service vide order dated 06.08.2021. (Copy of order is enclosed as Annexure "C").
5. Incorrect. The revision petition of the appellant was rejected being badly time barred vide order dated 01.08.2022 (Annexure "D"). It is worth to add here that when appeal before departmental authority is time barred, service appeal before the Service Tribunal is incompetent. Reliance has already been placed on 2017 SCMR 965, 2006 SCMR 453, 2007 SCMR 513, 2011 SCMR 1429 & 2021 SCMR 144. Furthermore, the instant service appeal is not maintainable on the following Grounds.

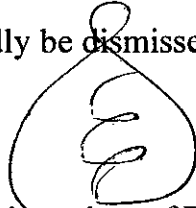
GROUND:-

- A. Incorrect. The orders passed by the Competent Authority and Appellate Authority are quite legally justified therefore no need to be set aside.
- B. Incorrect. The orders passed by the respondents are maintainable in accordance with law/ rules.
- C. Incorrect. The departmental proceedings were conducted in accordance with Law.
- D. Incorrect. As already explained in Para No. 4 of Facts.
- E. Incorrect. The appellant has been treated in accordance with law/ rules.
- F. Incorrect and misleading. The departmental appeal was rejected on cogent reasons and under the mode of competency.
- G. Incorrect. As already explained above in Para No. 4 of Facts.

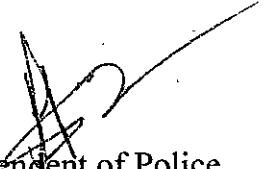
- H. Incorrect. As already explained above. The appellant has been treated in accordance with law/ rules.
- I. Incorrect and misleading. The appellant badly failed to prove his innocence during departmental proceedings.
- J. The orders passed by the authorities are quite in accordance with law/ rules.
- K. The respondents may also be allowed to raise additional Grounds at the time of hearing of the instant service appeal.

PRAYER:-

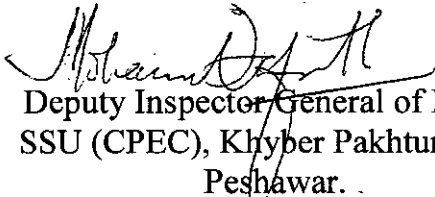
Keeping in view the above stated facts and rules it is therefore humbly prayed that the appeal is not maintainable being devoid of merits hence, may kindly be dismissed with costs, please.



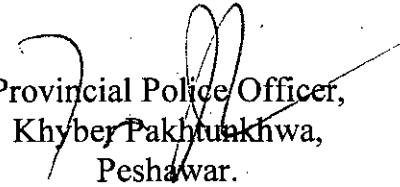
Superintendent of Police,
HQrs: Peshawar.
(Respondent No. 4)



Superintendent of Police,
Admn, SSU (CPEC), Khyber
Pakhtunkhwa, Peshawar.
(Respondent No. 3)



Deputy Inspector General of Police,
SSU (CPEC), Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 2)



Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 1)

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

Service Appeal No. 1285/2022

Provincial Police Officer, Khyber Pakhtunkhwa,
Peshawar..... (Petitioner)

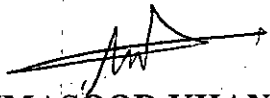
VERSUS

Muhammad Kamal Khan.....(Respondents)

AFFIDAVIT

I, Masood Khan SI/Legal, SSU/CPEC do hereby solemnly affirm on oath that the contents of writ petition on behalf of Inspector General of Police, Khyber Pakhtunkhwa, Peshawar are correct to the best my knowledge and belief. Nothing has been concealed from this Honorable Court.

DEPONENT


(MASOOD KHAN)
SI/ Legal,
SSU/CPEC, PESHAWAR.
17101-0392555-1
0314-9823269

AUTHORITY LETTER

Mr. Masood Khan SI/Legal, SSU/CPEC, Peshawar Focal Person is authorized to pursue the cases pertaining to SSU/CPEC, Peshawar in Honorable Khyber Pakhtunkhwa, Service Tribunal, Peshawar submission of Para-wise comments/ reply in Honorable Tribunal on behalf of undersigned, please.



**MUHAMMAD ZAFAR ALI KHAN
COMMANDANT,
SSU/CPEC, PESHAWAR.**



S 10

OFFICE OF THE
SPECIAL SECURITY UNIT (CPEC)
KHYBER PAKHTUNKHWA POLICE,
PESHAWAR

Ph: 091-9211067 Fax 091-9213165, Email: ssu.cpec@gmail.com

No. 172-76 /OHC/HQrs. dated Peshawar the 13 / 01 / 2021

ORDER

Constable Kamal No. 6429 of SSU (CPEC), CCP Peshawar absented himself from his lawful duty w.c.f 18.11.2020 till date without taking any leave or permission from competent authority, received vide SP Hqrs. CCP Peshawar letter No. 255/PA dated 01.01.2021. Therefore, he is placed under suspension, pay stopped & direct him to collect his SCN from this office.

Amir Muhammad Khan Khadukhel
(AMIR MUHAMMAD KHAN KHADUKHEL)

SP Admin & HQrs. SSU (CPEC)
For Deputy Inspector General, of Police,
Operations & SSU (CPEC)
Khyber Pakhtunkhwa

Copy for information to the:

1. Worthy DIG Ops & SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
2. SP Hqrs. CCP Peshawar.
3. Accountant HQrs. SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
4. RI HQrs: SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
5. SRC HQrs. SSU (CPEC), Khyber Pakhtunkhwa Peshawar.

41
13 01 2021

**ORDER OF INQUIRY AGAINST CONSTABLE KAMAL NO. 6429 CONTAINED
UNDER SUB, RULE 4, OF RULE 5 OF NWFP (NOW KHYBER PAKHTUNKHWA)
(E&D) RULES 1975.**

It has been made to appear before me that accused Constable Kamal No. 6429 is primes-face guilty of the following charges to be dealt with under General Police proceedings contained u/r 5(4) of NWFP Rules (E&D) 1975.

Constable Kamal No. 6429, of SSU (CPEC), District CCP, Peshawar, being remained absented himself from lawful duty w.e.f 18.11.2020 till to date received CCP, Peshawar vide letter No.255/PA dated 01.01.2021 without taking any leave/permission from competent authority.

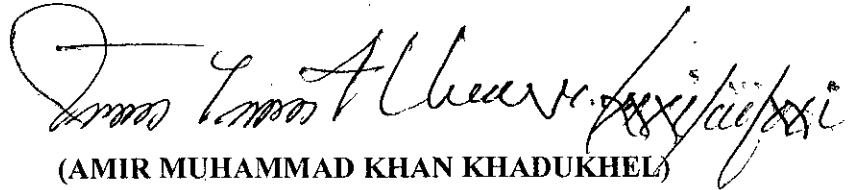
In this regard a show cause has been issued to you with the letter No.171 dated 13.01.2021, but you failed to submit your reply. Therefore, you are hereby issued with a charge sheet, and called upon to submit your written defence statement against the above charged before the enquiry officer.

The act of accused official falls within the ambit of misconduct within the meaning of rules 2 (iii) rules 1975 and is liable to be proceeded with under the General police proceedings, contained in Police Rules 1975.

From the above charge, I am convinced that the said official has ceased to become efficient and it accused of gross misconduct therefore, I Superintendent of Police Special Security Unit (CPEC) HQrs. Peshawar being authorized officer within the meaning of 2(ii) of the said rules nominate Inquiry Officer. Inspector Fazle Mabood Khan to inquiry into the charge, levelled against him.

The Inquiry officer after completing all inquiry proceedings, shall forward the verdict/Findings to the undersigned within due dated period of 10-days contained U/S 6 (5) of the rules.

Charge sheet and summary of allegations against the accused officer, are being issued separately, reply where of shall be submitted before the enquiry officer within the period of 07.days from date of receipt.



(AMIR MUHAMMAD KHAN KHADUKHEL)

SP Admin/HQrs, SSU (CPEC)

Khyber Pakhtunkhwa Peshawar

No. 932-33 /HQrs/SSU dated Peshawar the 31/03 /2020.

Enquiry Officer. INSPECTOR FAZLE MABOOD KHAN

OFFICE OF THE
SPECIAL SECURITY UNIT (CPEC)
KHYBER PAKHTUNKHWA POLICE,
PESHAWAR

Ph: 091-9211067 Fax 091-9213165, Email: ssu.cpec@gmail.com

3043-48 HQrs/SSU/

dated Peshawar the 06/08 /2021

ORDER


This office order will dispose the formal departmental enquiry against Recruit Constable Muhammad Kamal No. 6429 of Special Security Unit (CPEC), CCP Peshawar.

Brief facts of the case are that the Recruit Constable Muhammad Kamal No. 6429³¹¹ absented himself from his lawful duty w.e.f (i) 18.11.2020 till to date received vide SP HQrs: CCP Peshawar letter No. 255/PA, dated 01.01.2021.

In this regard, a Note Sheet was presented before DIG Ops and SSU (CPEC), where he passed the remarks pay stopped, suspended and for departmentally inquiry. The accused Constable placed under suspension, pay stopped and issued SCN vide this office order No. 172-76/OHC/HQrs dated 13.01.2021, which was received by the Constable himself. He was summoned again and again but he did not feel bother to submit his reply. An enquiry file consisting 11 pages received from SP HQr CCP Peshawar vide letter No. 661/PA, dated 28.01.2021, (where the constable had repatriated unqualified from PTC Hangu for 27 days absence without taking any prior permission or leave from competent authority, requesting for further necessary action. Therefore, he was issued with a Charge Sheet vide this office order No. 932-33, dated 31.03.2021 and Fazle Mabood Khan was nominated as Enquiry Officer. During the course of inquiry it was reported that he made his arrival vide DD report No. 28 dated 17.03.2021 and absented himself once again w.e.f. 29.03.2021 till to date vide DD report No. 2 received from LO CCP Peshawar. Charge Sheet was received by the constable himself on date 12.04.2021 and submitted his reply on dated 13.04.2021 of his illness and produced 06 medical prescriptions from a private Herbal doctor. The constable was enquired thoroughly by the EO and made some cross questions and after proper proceedings the EO submitted his findings report that the accused constable remained absented for 27 days from PTC Hangu, 03 months and 29 days from CCP Lines and absented once again w.e.f. 29.03.2021 till to date and recommended him for discharge from service for his deliberately absence because the accused Constable could not submit any cogent reason, therefore he was issued with a final Show Cause Notice vide this office order No. 1799/OHC/HQrs, dated 26.05.2021, served upon him on 23.06.2021, summoned for statement time and again but he did not take any part in the enquiry proceeding.

Therefore, keeping in view the above facts, recommendation of the EO, I, Superintendent of Police Admin and HQrs SSU (CPEC) in exercise of the powers vested in me under police rule 197 (amended 2014) hereby awarded him a major punishment of "Discharge him from Service" with immediate effect. The period he remained absent treated as without pay and the accountant must reckon and recover the amount if paid during the absence.

Order announced.


(AMIR MUHAMMAD KHAN KHADUKHEL)
SP Admin & HQrs. SSU (CPEC)
Khyber Pakhtunkhwa, Peshawar

Copy for information to the:

1. Worthy DIG Ops & SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
2. SP HQrs CCP Peshawar.
3. Accountant HQrs. SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
4. RI/LO/OHC HQrs. SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
5. SRC SSU (CPEC), Khyber Pakhtunkhwa Peshawar.

OB No. 418

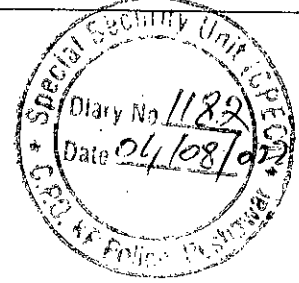
Dated 06/08/2021

OFFICE OF THE
INSPECTOR GENERAL OF

KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. S/ 1684 /22, dated Peshawar the 01/08/2022.

To : The Commandant,
Special Security Unit (CPEC),
Khyber Pakhtunkhwa, Peshawar.



Subject:- REVISION PETITION.

Memo:

Please refer to your office Memo: No. 4549-51/EC/HQrs/SSU, dated 20.07.2022.

The Competent Authority has examined and filed the revision petition submitted by Ex-FC Muhammad Kamal No. 6429 of CPEC Unit against the punishment of discharge from service awarded by SP/Admin & HQrs: SSU (CPEC), Khyber Pakhtunkhwa, Peshawar vide order No. 3043-48/HQrs/SSU, dated 06.08.2021, being time barred.

The applicant may please be informed accordingly.

(NOOR AFGHAN)

Registrar,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

SP/Admin:

OAsi
for further action
and report please

04/08/2022
Commandant SSU

SP/A
04/08/22

VAKALATNAMA

NO. _____/20

IN THE COURT OF KP SERVICE TRIBUNAL PESHAWAR

Muhammad Kamal Khan

Appellant
Petitioner
Plaintiff

VERSUS

Police Deptt

Respondent (s)
Defendants (s)

I/WE Muhammad kamal Khan (Appellant)

do hereby appoint and constitute the SYED NOMAN ALI BUKHARI Advocate High Court for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE _____/20



(CLIENT)

ACCEPTED



SYED NOMAN ALI BUKHARI
ADVOCATE HIGH COURT

CELL NO: 0306-5109438