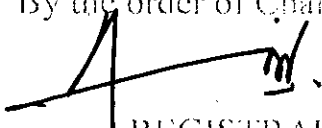


FORM OF ORDER SHEET

Court of

Appeal No.

2084/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/10/2023	<p>The appeal of Mr. Umar Khan resubmitted today by Uzma Syed Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Umar Khan Ex-Constable No. 5043 FRP Kohat Range received today i.e on 28.09.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal.
- ② Copy of revision petition mentioned in the memo of appeal is not attached with the appeal.
- 3- Annexure-A of the appeal is illegible which may be replaced by legible/better one.

No. 3331 /S.T.

Dt. 02/10 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Noman Ali Bukhari Adv.
High Court at Peshawar.

Respected Sir,

all objections removed & file resubmitted
of file
9/10/23

① Copy of charge sheet & reply is not available with appellant may be requisition from the dept. Show cause notice was not issued to appellant.

② Copy of Revision also not available with the appellant may be requisition from the dept. The order passed on same Revision is available on file.

file re-submitted
of file
9/10/23

Sir,

Objection 1 and 2 are still standing. The reply of the app learned counsel for the appellant submitted for an appropriate order, please.

A
10/10/23

Hon'ble Chairman

Objections
The appellant
must file requisite docs
sustain
shall do
WTI ⑦
11/8/23

3380
11/10/23

Respected Sir,

It is submitted that we filed Application through RTI Act for the Provision of do we have received only charge sheet & show cause and didn't provide inquiry report and revision pt. It is requested that the appeal may be put before P. H

UZMA
17-10-2023

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 2084 /2023

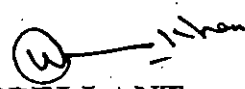
Umar Khan

V/S

Police Deptt:

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	-----	1-7
2.	Copy of impugned order	A	08
3.	Copy of appeal	B	09
4.	Copy of rejection order	C	10
5.	Copy of 11-A appeal	D	11
6.	Wakalat nama	----	12


APPELLANT
Umar Khan

THROUGH:


(UZMA SYED)
ADVOCATE HIGH COURT


(SYED NOMAN ALI BUKHARI)
ADVOCATE, HIGH COURT.

①

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 2084 /2023

Umar khan Ex-Constable No.5043
FRP Kohat Range.

.....(Appellant)

VERSUS

1. The Inspector General of Police, KP, Peshawar.
2. The Commandant FRP, KP, Peshawar.
3. The Deputy Commandant FRP, KP, Peshawar.

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE KP SERVICES TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 05/09/2022 WHEREBY THE APPELLANT WAS REMOVED FROM SERVICE ILLEGALLY WITHOUT LAWFUL AUTHORITY AND WITHOUT JURISDICTION AND AGAINST THE REJECTION ORDER DATED 07-11-2022 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED WITHOUT SHOWING ANY COGENT REASON AND ALSO AGAINST THE ORDER DATED 16/01/2023 WHEREBY THE APPEAL UNDER 11-A WAS REJECTED WITHOUT SHOWING ANY REASON.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 05/09/2022, 07/11/2022 AND 16/01/2023 MAY KINDLY 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 FAVOR OF APPELLANT.

(2)

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant has joined the police department as constable in the year 2007 and since appointment appellant work with full zeal and zest.
2. That During the entire service, the appellant has not given an iota of chance of complaint to his high-ups but unfortunately, the appellant was charge sheeted on the ground of absentia the appellant properly replied to the charge sheet and rebutted the allegation that the appellant never remained absent.. but the reply of the appellant was not considered.
3. That ex-Partee inquiry was conducted against the appellant so the appellant remains condemned unheard which means that the inquiry officer made his mind to remove the appellant.
4. That on the basis of that findings, without issuing final show cause notice and also not providing of inquiry report to the appellant the competent authority (Deputy commandant) awarded the impugned punishment vide order dated 05-09-2022 without using independent mind, without personal hearing and show cause notice which means that the competent authority made his mind to remove the appellant which is discriminatory, against the law and justice. **Copy of impugned order is attached as annexure-A.**
5. That the appellant feeling aggrieved filed departmental appeal against the impugned order which was rejected without showing any cogent reason vide order dated 07.11.2022. **Copy of departmental appeal and rejection order is attached as annexure-B & C.**
6. That the appellant feeling aggrieved filed 11-A revision petition under police rule 1975 to IGP KP Peshawar but the copy of the same was not available with the appellant may be requisition from the department. Which was also rejected vide order dated 16/01/2023 never communicated to the appellant but appellant received the same on 29/8/2023. Hence the present appeal on the following grounds amongst other. **Copy of 11-A order is attached as annexure-D.**

GROUND:

- A. That the appellant the impugned order dated 05/09/2022, 07/11/2022 and 16/01/2023 are against the law, norms of justices and without lawful authority. Hence liable to be set-aside.
- B. That the inquiry report and show cause was also not provided to the appellant, which is clear violation of Superior Court judgment. That principal is also held in the appeal of the **Waleed Mehmood vs Police Deptt and Zeeshan vs police**, so the impugned order was passed in violation of law and rules and norms of justice. The same principle held in the Superior Court judgments cited as 1981 PLD SC 176 and 1987 SCMR 1562, without which all the proceedings is nullity in the eyes of law. Reliance was placed on **2018 PLC (CS) 997 and 2019 SCMR 640**.
- C. That no proper inquiry was conducted. Neither any documents or report was provided to appellant for examination nor any statement of witnesses recorded in the presence of appellant. Even a chance of cross examination was also not provided to the appellant which is violation of norms of justice.
- D. That the appellant has been condemned unheard in violation of Article 10-A of the Constitution of Islamic republic of Pakistan and in violation of maxim "Audi Alterum Partum" and has not been treated according to law and rules. That according to reported judgment cited as **2019 CLC 1750** stated that Audi Alterum Partum" shall be read as part and parcel of the every statute. The same principle held in the Superior Court judgments cited as 2016 SCMR 943, 2010 SCMR 1554 and 2020 PLC(cs) 67, where in clearly stated that the penalty awarded in violation of maxim "Audi Alterum Partum" is not sustainable in the eye of law.
- E. That vide impugned order dated 05-09-2022, the penalty of removal from service was imposed on the appellant under Police Rules 1975 without using independent mind. The appellant feeling aggrieved filed departmental appeal, which was also rejected on dated 0711/2022 for no good ground and without applying independent mind. Which practice is quite incorrect and

turned down by the apex court in a latest judgment contained in 2020 PLC (CS) 1291.

- F. That the attitude and conduct of the Department shows that they were bent upon to remove the appellant at any cost.
- G. That there is no chance of self-defense was provide to the appellant and according to Supreme Court judgment mere on the basis of allegation no one should be punished.
- H. That it is the maxim of the law (audi alteram peltrum) that no one should be unheard, and the impugned order is also passed in violation of article of 10-A OF the constitution of Pakistan which told us about the fair trial which was the fundamental right of the appellant but denied to the appellant. So the impugned order is not tenable in the eye of law.
- I. That the appellant was deprived of his inalienable right of personal hearing and opportunity to cross examine witnesses. The opportunity of offering proper defense was snatched from the appellant. The Hon'able Service Tribunal has been consistently following this yardstick almost in all cases, so departure from the set pattern and that too without any cogent reason in the present case would cause irreparable damage to the appellant at the cost of substantial justice. Such inquiry proceeding could not be termed as fair, just and reasonable, as the respondents badly failed to prove charges. Such practice has already been disapproved by the apex court contained in its judgments PLD 1989 SC 335, 1996 SCMR 802, 2018 PLC (CS)997 and 2019 SCMR 640.
- J. That the impugned order is against the articles 2A , 4, and 25 , of the constitution of Pakistan 1973.
- K. The appellant have never committed any act or omission with bad or malafide intentions which could be termed as misconduct, albeit the appellant was dismissed from the service. Which is violation of reported judgment cited as 1997 PLC cs 564.
- L. That the appellant was required to give an opportunity of showing cause of the proposed action which was to be taken by the competent authority but this opportunity was not afforded to the appellant which is mandatory under police rules and other laid down rules. Thus, the appellant was condemned as unheard

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by violating the due process of law at every stage of the inquiry proceedings.

M. That according to Federal Shariat court Judgment cited as *PLD 1989 FSC 39* the show cause notice is must before taking any adverse action, non-issuance of show cause notice is against the injunction of Islam. Hence the impugned order is liable to be set-aside.

N. That the show cause is the demand of natural justice and also necessary for fair trial and also necessary in light of injunction of Quran and Sunnah but show cause was not given to the appellant. So, fair trail denied to the appellant which is also violation of Article 10-A of the constitution. Further it is added that according to reported judgment cited as *1997 PLD page 617* stated that every action against natural justice treated to be void and unlawful. Hence impugned order is liable to be set-aside. The natural justice should be considered as part and parcel of every statute according to superior court judgment cited as *2017 PLD 173 and 1990 PLC cs 727.*

O. 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
Umar Khan

THROUGH:



(UZMA SYED)
ADVOCATE HIGH COURT

(SYED NOMAN ALI BUKHARI)
ADVOCATE, HIGH COURT.

6

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL NO. _____/2023

Umar 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 Police rules 1975.
3. Any other case law as per need.


APPELLANT
Umar Khan

THROUGH:


(UZMA SYED)
ADVOCATE HIGH COURT


(SYED NOMAN ALI BUKHARI)
ADVOCATE, HIGH COURT.

2

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

S.A NO. _____/2023

Umar Khan


V/S

Police Deptt:

AFFIDAVIT

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

DEPONENT


Umar Khan

CLV-0117777

FORM NO. 9214-1

8

R

1157
7-9-22

ORDER

This order will dispose of the Departmental Inquiry initiated against Constable Umar Khan No. 5043 of F.R.P. Kohat Range on the score of the following grounds

Brief facts of the case are that Constable Umar Khan No. 5043 of F.R.P. Kohat Range deliberately absented himself from lawful duty w.e.f 10.08.2022 till date.

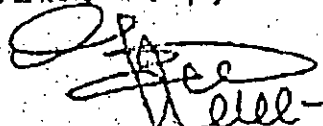
In this regard proper departmental inquiry was initiated against him. He was issued Charge Sheet / Statement of allegations and O.A.S.I. F.R.P. HQs Peshawar was nominated as Inquiry Officer. The Inquiry Officer after conducting proper departmental inquiry submitted his findings, wherein he recommended for taking ex-parte action against the accused official.

Upon findings of Inquiry Officer, the accused official was issued Final Show Cause Notice, to which he failed to submit reply within the stipulated period. He was given full opportunity of personal hearing in the Orderly Room of the undersigned on 26.08.2022 but he failed to appear for personal hearing.

Keeping in view the recommendations of the Inquiry Officer and other available record, it has come crystal clear that the defaulter official i.e Constable Umar Khan No. 5043 is not interested in his duties.

Therefore, in exercise of powers conferred upon me under the Khyber Pakhtunkhwa, Police Rules 1975, amended 2014, I, Jehan Zeh Khan Barki P.S.P, Deputy Commandant F.R.P, Khyber Pakhtunkhwa Peshawar being competent authority, have tentatively decided to award Major punishment of Removal from Service to Constable Umar Khan No. 5043 of F.R.P. Kohat Range with immediate effect. However, his absence as well as intervening period is treated as leave without pay.

Order Announced.


(JEHANZEB KHAN BARKI) PSP
Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.

No. 1530-31 Peshawar dt. 05/09/2022.

Copy of above is forwarded:-

For information to the:-

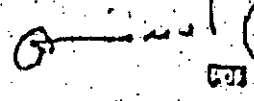
Worthy Commandant, F.R.P, Khyber Pakhtunkhwa Peshawar.

For necessary action to the:-

Superintendent of Police, F.R.P, Kohat Range. (Complete Inquiry File 07 pages are enclosed).

OHC/FRP O/PA

For n/a action



Superintendent of Police,
F.R.P. Kohat Range
Kohat

15/9/22

Better Copy

8

ORDER

This order will dispose off the Departmental Inquiry initiated against Constable Umar Khan No. 5043 of F.R.P Kohat Range on the score of the following grounds:-

Brief facts of the case are that Constable Umar Khan No. 5043 of F.R.P Kohat Range deliberately absented himself from lawful duty w.e.f 10.05.2022 till date.

In this regard proper department inquiry was initiated against him. He was issued Charge Sheet/Statement of allegations and O.A.S.I F.R.P HQrs Peshawar was nominated as Inquiry Officer. The Inquiry Officer conducting proper departmental inquiry submitted his findings, whererin he recommended for taking ex-parte action against the accused officials.

Upon findings of Inquiry Officer, the accused official was issued Final Show Cause Notice, to which he failed to submit reply within the stipulated period. He was given full opportunity of personal hearing in the Orderly Room of the undersigned on 20.08.2022 but he failed to appear for personal hearing.

Keeping in view the recommendations of the Inquiry Officer and other available record, it has come crystal clear that the defaulter officials i.e Constable Umar Khan No. 5043 is not interested in his duties.

Therefore, in exercise of powers conferred upon me under the Khyber Pakhtunkhwa, Police Rules 1975, amendment 2014, Jehan Zeb Khan Barki P.S.P Deputy Commandant F.R.P Khyber Pakhtunkhwa Peshawar being competent authority have tentatively decided to award major punishment of Removal from Service to Constable Umar Khan No. 5043 of F.R.P Range with immediate effect. However, his absence as well as intervening period is treated as leave without pay.

Order announced.

(JEHANZEB KHAN BARKI) PSP
Deputy Commandant,
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar

No: 1530-31/PA Dated Peshawar the 05/09/2022.

Copy of above is forwarded

For information to the:-

Worthy Commandant, F.R.P Khyber Pakhtunkhwa Peshawar.

For necessary action to the:-

Superintendent of Police F.R.P Kohat Range (Complete Inquiry File pages are enclosed).

گزشتہ سے اس سلسلے میں ۲۰۰۰ سے زائد مسائل اور سوالات
 لکھنے ہوئے ہیں۔ اس سلسلے میں ڈیوٹی نیا ہیڈ ایجنڈا جاری ہے۔ جس میں اس سلسلے
 کے لیے اس سلسلے کے ذریعہ نیا ہیڈ ایجنڈا جاری کیا گیا ہے۔ اس دوران مسائل دیکھ کر اس
 کے لیے منتخب ہوا مسائل کے ذریعہ لکھنے کو جس میں اس میں ۱۰۰۰ سے زائد مسائل
 اور دیکھ کر اس کے ذریعہ اس سلسلے میں اس سلسلے کے لیے اس سلسلے کے لیے اس سلسلے کے لیے
 سے لکھنے کے لیے اس سلسلے کے لیے اس سلسلے کے لیے اس سلسلے کے لیے اس سلسلے کے لیے
 اور اس میں ڈیوٹی جاری ہے۔ اس دوران اس سلسلے کے لیے اس سلسلے کے لیے اس سلسلے کے لیے
 میں صرف ۱۰۰ سے زائد مسائل جاری ہیں۔ اس سلسلے کے لیے اس سلسلے کے لیے اس سلسلے کے لیے
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C-10

ORDER

This order will dispose of the departmental appeal preferred by Ex-constable Umar Khan No. 5043 of FRP Kohat Range; against the order of Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar, issued vide Order Endst; No. 1530-31/PA, dated 05.09.2022; wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he was selected for refresher course at FRP HQs; and after completion of such course he made his departure without prior permission of the competent authority and also failed to pay the costs of Mess dues. Thus he was transferred to FRP HQs; but he failed to report his arrival at his new place of posting and remained absented himself from lawful duty with effect from 10.05.2022 till the date of his removal from service i.e 05.09.2022 for total period of 03 months 25 days, without any leave or prior permission of the competent authority.

In this regard, proper departmental proceedings were initiated against him as he was issued Charge Sheet alongwith Statement of Allegations and OASI FRP HQs; Peshawar was nominated as Enquiry Officer to conduct proper enquiry against him. After completion of enquiry, the Enquiry Officer submitted his finding report, wherein he recommended that ex-parte action may be taken against the above named accused official.

Upon the findings of Enquiry Officer, he was issued Final Show Cause Notice, to which he failed to submit reply within stipulated period. He was called for personal hearing in orderly room on 26.08.2022, but he failed to appear before the competent authority.


Keeping in view the above narrated facts and other material available on record, he was awarded major punishment of removal from service vide Order Endst; No. 1530-31/PA, dated 05.09.2022.

Feeling aggrieved against the impugned order of Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 01.11.2022.

During the course of personal hearing, the applicant failed to present any justification regarding to his proiong absence. From perusal of enquiry file it has been found that the allegations of willful absence were fully established against him by the Enquiry Officer during the course of enquiry. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force. Therefore any leniency or complacency would further embolden the accused officer and impinge upon adversely on the overall discipline and conduct of the force. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, I, Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

Order Announced.


Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

No 9022-23 ISI Legal, dated Peshawar the 07/11/2022.

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

1. SP FRP Kohat Range, Kohat. His Service record alongwith D-file sent herewith.
2. Ex-constable Umar Khan No. 5043 S/o Selawar Khan R/o Village Tapi, Police Station Sadar, District Kohat.



D-11

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

No. S/ 85 /23, dated Peshawar the 16 / 01 /2023.

To : The Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.

Subject: REVISION PETITION.

Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-FC Umar Khan No.5043 of FRP Kohat Range against the punishment of dismissal from service awarded by Deputy Commandant Khyber Pakhtunkhwa Peshawar vide order Endst: No. 1530-31/PA, dated 05.09.2022 being time barred.

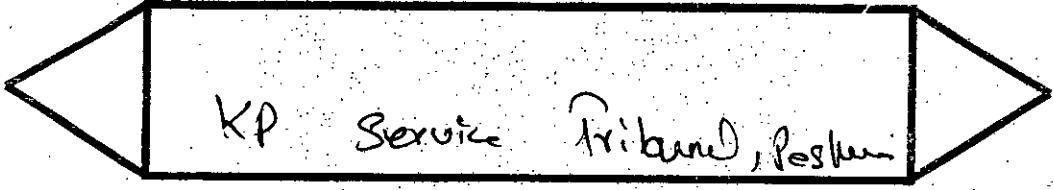
The applicant may please be informed accordingly

[Signature]
13/11/23
(AFSAR JAN)
Registrar.

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

Recd. by [Signature] on 29/1/23

بعدالت



مورخہ	عمیر خاں	2۰۰۰ منجانب
مقدمہ	بنام	بنام
دعویٰ	لوہیس ڈی سی ایم	لوہیس ڈی سی ایم
جرم		

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام پشاور کیلئے عظمیٰ سید و سید نعمان علی بخاری

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے قیقر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے

اور اس کا ساختہ پرداختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے

سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔

کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

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المرقوم

العبد گ ۵۵ العبد

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