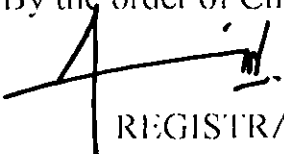


FORM OF ORDER SHEET

Court of _____

Appeal No. 2593/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	15/12/2023	<p>The appeal of Mr. Ajab Khan resubmitted today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshi is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

**SCANNED
KPST
Peshawar**

The appeal of Mr. Ajab Khan ex-constable police department Torgher received today i.e on 04.12.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1 ✓ Check list is not attached with the appeal.
- 2 ✓ Annexures of the appeal are unattested.
- 3 ✓ Appeal has not been flagged/ marked with annexures marks.
- 4 ✓ Affidavit has not got attested by the Oath Commissioner.
- 5 ✓ Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal.
- 6 ⑥ Copy of departmental appeal and revision petition mentioned in the memo of appeal are not attached with the appeal.
- 7 ✓ The documents that are to be provided must be readable/legible.
- 8 ✓ 5 more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3776 /S.T,

Dt. 05-12 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Taimur Ali Khan Adv.
High Court Peshawar.

Respected Sir.

1- Removed -

2- Removed -

3- Removed

4- Removed

5- Copies of charge sheet, Statement of allegations, Show cause notice, enquiry report all attached from page 10 to 14.

6- Copies of departmental appeal and revision petition are not present with the appellant which may be requisite from the department as dept is not ready to provide the same and as per Rule 6 the tribunal has power to name Resubmitted after 30 days of compliance.

7- Resubmitted

8- Removed

14/12/2023

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

SERVICE APPEAL NO. 2593 /2023

Ajab Khan

V/S

Police Department

**APPLICATION FOR FIXING THE INSTANT
APPEAL AT PRINCIPLE SEAT AT PESHAWAR.**

RESPECTFULLY SHEWETH:

1. That the appellant has filed the instant appeal in this Honorable Service Tribunal against the order dated 05.12.2022, whereby the appellant was dismissed from service, against the order dated 25.05.2023, whereby the departmental appeal of the appellant was rejected and against the order dated 09.08.2023, whereby the revision of the appellant was also rejected.
2. That instant appeal is in the jurisdiction of Camp Court Abbottabad of this Honorable Tribunal, but the appellant engaged counsel who is doing legal practice at Peshawar and the appellant also wants to peruse his case at principle seat at Peshawar.
3. That it will be convenient for the appellant as well as his counsel if the instant appeal is fix at principle seat at Peshawar.

It is therefore most humbly prayed that on the acceptance of this application, the instant appeal may kindly be fixed at principle seat at Peshawar of this Honorable Tribunal.

THROUGH: **APPELLANT**



**TAIMUR ALI KHAN
ADVOCATE HIGH COURT**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 2593 /2023

RECEIVED
APPEALS
SECTION
PESHAWAR

Ajab Khan

V/S

Police Department

INDEX

S.No.	Documents	Annexure	P. No.
1	Memo of Appeal	-----	01-03
2	Affidavit	-----	04
3	Copy of medical reports	A	05-08
4	Copy of dismissal order dated 05.12.2023, charge sheet, statement of allegations, inquiry report and show cause notice	B,CD&E	09-14
5	Copies of order dated 25.05.2023, application and order dated 09.08.2023	F,G&H	15-17
6	Vakalat Nama	-----	18

THROUGH:

APPELLANT



(TAIMUR ALI KHAN)

ADVOCATE HIGH COURT

Cell# 0333-9390916

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

SERVICE APPEAL NO. 2593 /2023

Khyber Pakhtunkhwa
Service Tribunal

Date: 01/11/23

Signature: [Signature]

Mr. Ajab Khan Ex-Constable No.52,
Police Post Taralla, District Toghhar.

(APPELLANT)

VERSUS

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad.
3. The District Police Officer, Toghhar.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 05.12.2022, WHEREBY THE APPELLANT WAS DISMISSED FROM SERVICE, AGAINST THE ORDER DATED 25.05.2023, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED AND AGAINST THE ORDER DATED 09.08.2023 RECEIVED BY THE APPELLANT ON 07.11.2023, WHEREBY THE REVISION OF THE APPELLANT WAS ALSO REJECTED.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDERS DATED 05.12.2022, 25.05.2023 AND 09.08.2023 MAY KINDLY BE SET ASIDE AND APPELLANT MAY BE REINSTATED INTO HIS SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY, WHICH THIS HONORABLE TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO, BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWTH:

FACTS:

1. That the appellant was appointed as Constable in the respondent department and since his appointed, the appellant has performed his duty with devotion and honesty, whatsoever assigned to him and no complaint has been filed against him regarding his performing.
2. That the appellant was seriously ill and the appellant has informed his superior about his illness and due to his illness, the appellant was compelled to remains absent from his duty. **(Copy of medical reports are attached as Annexure-A)**
3. That when the appellant was recovered he went to join his duty, but he was informed that he has been dismissed from service on 05.12.2022 and handed him his dismissal order dated 05.12.2022 along with charge sheet, statement of allegations, inquiry report and show cause notice. **(Copies of dismissal order dated 05.12.2022, charge, sheet Statement of allegations, inquiry report and show cause notice are attached as Annexure-B,C,D&E)**
4. The appellant being aggrieved from the order dated 05.12.2022 filed departmental appeal which was rejected on 25.05.2023, however the appellant did not keep the copy of departmental appeal, which may be requisite from the department, the appellant then filed revision which was also rejected on 09.08.2023 and the same order was received by the appellant on 07.11.2023 through an application dated 07.11.2023, however the appellant did not keep the copy of revision which may be requisite from the department. **(Copies of order dated 25.05.2023, application and order dated 09.08.2023 are attached as Annexure-F,G&H)**
5. That the appellant has no other remedy except to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

GROUND:

- A) That the impugned orders dated 05.12.2022, 25.05.2023 and 09.08.2023 are against the law, rules, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) That in the inquiry proceeding the appellant was never associated and whole action was taken against on the basis of ex-parte proceeding which is against the law and rules and as such the impugned order is liable to be set aside.

- C) That charge sheet along with statement of allegations were not communicated to the appellant before passing dismissal order and handed over to the appellant along with the dismissal order, which is violation of law and rules.
- D) That the appellant did not intentionally remain absent from his duty but due to his illness he was unable to perform his duty and was compelled to remain absent from his duty, therefore, needs to be treated with lenient view.
- E) That the penalty of dismissal from service imposed upon the appellant is very harsh, which is passed in violation of law and rule, therefore, the same is not sustainable in eyes of law and hence liable to be set aside.
- F) That the absence period of the appellant was already treated as leave without pay, therefore, there remain no ground to penalize the appellant on that absence and as such the impugned orders are liable to be set aside.
- G) That the appellant has not been treated in accordance with law and rules and has been condemned unheard throughout.
- H) That the appellant seeks permission of this Honorable Tribunal to advance other grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that that on the acceptance of this appeal, the orders dated 05.12.2022, 25.05.2023 and 09.08.2023 may kindly be set aside and appellant may be reinstated into his service with all back and consequential benefits. Any other remedy, which this Honorable Tribunal deems fit and appropriate that, may also, be awarded in favour of appellant.

عجاب خان
APPELLANT
Ajab Khan

THROUGH:


TAIMUR ALI KHAN
(ADVOCATE HIGH COURT)

4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2023

Ajab Khan

VS

Police Department

AFFIDAVIT

I, Ajab Khan Ex-Constable No.52, Police Post Taralla, District Toghar, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.

آجاب خان
DEPONENT

⑤

Medical No 2 Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME *[Handwritten Name]*

YEARLY NO

DATE *07/07/2017*

Rs. 10/-
OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO *51948*

DATE *04/07/2019*

DISEASE *[Handwritten Disease Name]*

DISPENSARY

[Handwritten notes]

[Handwritten notes]

[Handwritten notes]

[Handwritten notes]

[Handwritten signature and date 4/7/19]



AYUB TEACHING HOSPITAL, ABBOTABAD
Accident & Emergency Service Department

5

Book No.

S. No. 43

Patient : 0023285623

Ajab Khan

33 Year(Male

Father / Husband: MR JAHANGIR

Date: 06-JULY-2022 25-14-24

NIC #:

Receipt # K04231298886422144

Invoice # : K044233941255

Amount: 10

29 140/20
207 6882.
-1007 90.700

Wider
Blow up
Success/operation
459 1000

Lab. Valtad's Hlow }
for manifest injury }
for Spasmodic }
for group }
for group }

At: Complete Band Res
for 11 cases the patient
has chronic renal disease

Approved
Level of
Signature
15/14/2022

70



AYUB TEACHING HOSPITAL, ABBOTTABAD

Book No.

S. No. 103

Patient : 0024

Ajab Khan

33 Year(Male

Father / Husband. MR JAHANGIR

Date: 16-SEP-2022

NIC #:

Temp: 99. F°
BP: 135/95
WT: 68kg.
Pulse: 74 BPM

Inf - Provera 10
A 312

Epival 10
State
15/11

cell

Edema -
fever -
Excess
expressed.

Adv.
CT Scan
Schistosomiasis
S. urea

Inf. Epival 500 mg
Inf. Logins 100 mg
Inf. Spasmodin-400 mg
Inf. Bixin-1500 mg
Sof. Nootropyl - 1500 mg
175 mg

The patient is
Suffering from Acute Renal
Failure and Depression.
Advised Complete Bed
Rest for one month.
The Metabolism is Low.

Medication
16/9/22



AYUB TEACHING HOSPITAL, ABBOTTABAD

Book No.

S. No. 254

Patient : 00547

Ajab Khan

33 Year (Male

Father / Husband. MR JAHANGIR

Date: 23-NOV-2022

NIC #:

Handwritten notes on the left side of the page, including '115/110', 'Blood test', and 'cure?'.

Handwritten note: 'This patient'

Handwritten notes on the right side of the page, including 'if we could', 'performed in the', 'AS per', 'Brest', 'Spinal', 'Tumor', and 'Bio'.

Handwritten note: 'Completion of Level 1 and 2'.

Handwritten note: 'Smoking Dad'.

Handwritten notes: 'Alo. Complete', 'Bad Rest', 'Tumor', 'Chlorophyll'.

Handwritten notes: 'This', 'Spinal', 'Tumor'.

The patient has to take complete Bed Rest for one Month as the Level of urea DMS is high. Case report prepared - Dep: Urology

Handwritten signature and stamp area.

ORDER

B-2-B-9

This order will dispose of the departmental enquiry initiated against Constable Ajab Khan No.52 while at PP Taralla as Driver who absented himself from his official duties with 13.07.2022 to till date without any leave or permission of the competent authority.

He was charge sheeted for the allegations mentioned above by the undersigned vide Memo No.478-79/PA dated 08.08.2022 and enquiry was entrusted to Hayat Khan SDPO, Circle Jodiah. He after conducting detailed enquiry into the allegations recommended him for major punishment in his report as he has been proved guilty for the allegations mentioned in the Charge sheet and statement of allegations. He was served with Final Show Cause Notice vide No.644/PA dated 06.10.2022, in response to which he failed to submit his written explanation and also not appeared in OR to prove him innocent.

After going through enquiry file, his long absence mentioned above and in the light of recommendation of Enquiry Officer, I, Syed Mukhtar Shah, District Police Officer, Torghar, being competent authority in exercise of power under the relevant provision of KPK Police Rules, 1975 (with amendment 2014) am constrained to award him major punishment. Therefore, Constable Ajab Khan No.52 is hereby awarded major punishment of "Dismissal from Service" with immediate effect as ex-party. His period of absence from 13.07.2022 to till date is treated as leave without pay.

Order announced in his absence

District Police Officer,
Torghar

OB No. 285
Dated: 13-11-2022

Copy of above is submitted for favour of information and necessary action to the:

- 1. Ppy Officer, Torghar.
- 2. SRC Torghar.

District Police Officer,
Torghar

This order will be dispose of the departmental inquiry initiated against Constable Ajab Khan No. 52 while as Driver who absented himself from his officials duties w.e.f 13.07.2022 to till date without any leave permission of the Competent Authority.

He was charge sheeted for the allegations mentioned above by the undersigned vide Memo No. 478/PA dated 04.08.2022 and enquiry was entrusted to Hayat Khan SDPO, Circle Judbah. He after conducting enquiry into the allegations recommended him for major punishment in his report as he has been proved guilty for the allegation mentioned in the Charge Sheet and statement of allegations. He was served with Final Show Cause Notice vide No. 644/PA, dated 06.10.2022. In response to which he failed to submit his written explanation and also not appeared in OR to prove him innocent.

After going though enquiry file, his long absence mentioned above and in the light of recommendation of Enquiry Officer, I, Syed Mukhtar Shah, District Police Officer, Torghar, being competent authority in exercise of power under the relevant provision of KPK Police Rules, 1975 (with amendment 2014) am constrained to award him major punishment . Therefore, Constable Ajab Khan No. 52, is hereby awarded major punishment of "Dismiss of service" with immediate effect as ex-party. His period of absence from 13.07.2022 to till date is treated as leave without pay.

Order announced in his absence.

District Police Officer
Torghar

OB No. 285
Dated 25.12.2022

Copy of above is submitted for favour of information and necessary action to the:

1. Pay Officer.
2. SRC Torghar

Distract Police Officer
Torghar

C. 10

CHARGE SHEET

I, Mr. Syed Mukhtar Shah, District Police Officer, Torghar as competent authority hereby charge FC Ajab No.52 while posted as Driver PP Taralla for the allegation explained in the attached statement of allegations.


You appear to be guilty of misconduct under Khyber Pakhtunkhwa, Police Rules, 1975 (with amendment 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.

You are therefore directed to submit your written defence within (07) Seven days on receipt of the charge sheet to the Enquiry officer.

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

Intimate whether you desire to be heard in person or otherwise.

Summary of allegation is also enclosed.


District Police Officer,
Torghar

(11)

DISCIPLINARY ACTION

I. Mr. Syed Mukhtar Shah, District Police Officer, Torghar as competent authority of the opinion that FC Ajab No.52 while posted as Driver PP Taralla has rendered himself liable to be proceeded against departmentally as you committed the following act/omission within the meaning under the Khyber Pakhtunkhwa, Police Rules, 1975 (with amendment 2014).

SUMMARY OF ALLEGATION

As per report of MHC PP Taralla vide DD No.10 dated 13.07.2022, you have absented yourself from your official duty without any leave or permission of the competent authority w.e.f 13.07.202 to till date which shows gross misconduct on your part.

For the purpose of scrutinizing the conduct with reference to the above allegation.

Mr. Hayat Khan SDPO, Judbah is deputed as Enquiry Officer.

The Enquiry Officer shall in accordance under the provision of this above mentioned rules, provide reasonable opportunity of hearing to the accused, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or take other appropriate action against the accused.

The accused shall appear in the departmental proceedings on the date, time and place fixed by the Enquiry Officer/Committee.

District Police Officer,
Torghar

No. 478.79 /PA, dated Torghar the 04.08/2022

FC Ajab No.52 while posted as Driver PP Taralla, with the direction to submit his written statement to the Enquiry Officer, the receipt of the charge sheet/statement of allegations and also to appear before Enquiry Officer on the date, time and place fixed for purpose of departmental proceedings.

خا عالی

خواجہ مسعود انوار امیری از اراک کانٹینٹ مجیب خان بی بی صاحبہ
چوٹی ٹرائل نسبت غیر جاری صورت حال خدمت اور خانم مذکورہ کانٹینٹ ڈسٹرکٹ
13/7 13/10 چوٹی ٹرائل سے غیر جاری اور مذکورہ مختلف غیر جاری کی یادداشت
میں چارٹ شدہ جاری کی یادداشت انوار امیری صاحبہ نام ماریٹا کانٹینٹ مذکورہ بلڈ کو
لوڈھیہ چوٹی ٹرائل جواب مختلف اوقات میں پرانے جاری کی یادداشت اور من سیکر
رہیں نے بذریعہ فون رابطہ کیا مگر مذکورہ نے آنے اور جواب دہا کرنے کی زحمت نہ
کرتی بلکہ آخر مذکورہ مختلف جاری چارٹ شدہ بلڈ کانٹینٹ چوٹی ٹرائل چوٹی
مذکورہ DFCC نے چارٹ شدہ کی تبدیلی کانٹینٹ مجیب خان بی بی پر ذاتی کردار
مذکورہ مجیب خان ایک شہری بیان ہے چارٹ شدہ کے بارے میں DFCC بیان
بیان ہے مذکورہ مجیب خان بی بی کانٹینٹ کا چوٹی ٹرائل یا نشان نشانیت نہیں
حرف انوار امیری نے اسے مطابق بیان مجیب خان بی بی کو عبداللہ لہری کی رضایت
پر گرفتار کیا اور دھماکوں میں زخمی ہونا سے پہلے چوٹی ٹرائل کا آنا اور اس کے
میں شہرہ درد کا آنا اور اسے کاندھ پر مسلح کر دینا اور اسے جمع کیا اور
شہرہ لہری کے جیسے مذکورہ بلڈ کانٹینٹ نے عدالت میں چارٹ شدہ کی تبدیلی
نہیں کی اور اسے اور نہ چوٹی ٹرائل یا DFCC یا دیگر کسی سند اور شہادت
میں لگا سکا جس سے مذکورہ کا چوٹی ٹرائل یا نشان نشانیت اور چوٹی ٹرائل
میں زخمی ہوا تھا شہرہ لہری نے اسے اور چوٹی ٹرائل یا نشان نشانیت اور چوٹی ٹرائل
DFCC نے چارٹ شدہ کی تبدیلی چوٹی ٹرائل نے بھی اپنا شہری بیان مختلف لہری
حرف انوار امیری نے اسے اور شہرہ لہری نے اسے اور شہرہ لہری نے اسے اور
بیان دلید لہری اور چوٹی ٹرائل یا نشان نشانیت اور چوٹی ٹرائل یا نشان نشانیت اور

(2)

مذکورہ مجب خان 55 ناٹال بد ٹوٹا یہ جان ہے اور سی طر مذکورہ کانسیا
 کا سالہ رکارد سے Re ضلع لکڑی سے حاصل کر کے انٹرویو مذات ہے
 چونکہ انٹرویو کافی پرنا پورہ ہے اور مذکورہ کانسیا میں ناٹال جانہ نہ آیا ہے
 جس سے یہ عیار کھینچ مذکورہ جان جو جو وغیرہ جانہ جواب اور اپنی
 بیماری کا بیہوش بنا لیا اور بیہوش سازی کرتا ہے اور مذکورہ واقعہ بیمار
 کو تیار بنا کر لے گیا اور خود آ کر اس پر سیدھی لگا کر تیار
 مذکورہ کانسیا میں اس کا

خانی
 مذکورہ باہر کانسیا میں حالت و خجرات اور انٹرویو سے کہتے ہیں
 یا جانے کہ خود جو کچھ کہے ہیں ان میں فرار ہے اور وہ سینکڑوں
 نام رکھے ہیں خاطر مذکورہ Major Punishment کے نام سے قاتل
 کیا گیا ہے دیگر خانی کا حکم انضام کا اور صدر حالات میں انٹرویو اور سرت
 ہو کر عیار خانی کے حکم اور اس کے خانی کے اور طر مذکورہ

E (14)

OFFICE OF THE DISTRICT POLICE OFFICER, TORGHAR

No. 6244 /PA dated, Torghar the 6 /10 /2022.

FINAL SHOW CAUSE NOTICE.

(Unit Rule (3) KPK Police Rules, 1975 Amendments in 2014)

1. That You Constable Ajab No.52 while posted at Driver PP Taralla rendered yourself liable to be proceed under Rule 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct:

i. You while posted at Driver PP Taralla absented yourself from your official duties without any leave or permission by the competent authority w.e.f 13.07.2022 to till date. A charge sheet and summary of allegations was served upon you vide No.478-79/PA dated 04.08.2022 and enquiry was entrusted to SDPO, Circle Judbah who suggested/recommended for Major punishment in his enquiry report. Hence, this final showcase notice is issued to you, if you have any evidence in support of your defense otherwise ex-parte action will be taken against you.

ii, During proper departmental enquiry the allegations have been proved against you.

2. That by reason of above as sufficient material is placed before the undersigned therefore is decided to proceed against you in general Police proceedings without aid of enquiry officer.

3. That the misconduct on your part is prejudicial to good order of discipline in the Police Force.

4. That your retention in the police force will amount to encourage inefficient and unbecoming of good Police Officer.

5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more kind of the punishments as provided in the rules.

6. You are, therefore, called upon to Final Show Cause Notice as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rule, 1975 for the misconduct referred to above.

7. You should submit reply to this Final Show Cause Notice within 07 days of the receipt of the notice failing which an ex-parte action shall be taken against you.

8. You are further directed to inform the undersigned that you wish to be heard in person or not.

8. Ground of action is also enclosed with this Final Show Cause Notice.


District Police Officer,
Torghar

Received by _____
Dated, ___/___/2022



OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

☎ 0992-9310021-22

☎ 0992-9310023

✉ r.rpohazara@gmail.com

NO: 10182 /E DATED 25/05/2023

ORDER

This order will dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex- Constable Ajab Khan No. 52 of District Torghar against the punishment of "*Dismissal from service*" awarded by District Police Officer Torghar vide OB No. 285, dated 05-12-2022.

Brief facts leading to the punishment are that the appellant while posted at Police Station Taralla as a driver has absented from duty w.e.f 13-07-2022 to 05-12-2022 (04 months & 22 days) without any leave or permission.

After receiving his appeal, comments of District Police Officer, Torghar were sought and examined/perused. The undersigned called the appellant in OR on 23-05-2023 and heard him in person, where he has been given reasonable opportunity to defend himself against the charges, however he failed to advance any justification in his defense. Thus, the disciplinary action taken by the competent authority seems genuine and the appeal is liable to be dismissed. Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 (amended 2014) the instant appeal is hereby *filed/rejected* with immediate effect. Appeal is also time barred.

TAHIR AYUB KHAN (PSP)
Regional Police Officer,
Hazara Region, Abbottabad.

Copy forwarded to DPO, Torghar for information and necessary action w/r to his office Memo: No. 2735/PI, dated 03-03-2023. Service record alongwith Fauji missal containing enquiry file of the appellant is returned herewith for record.

جناب عالی IG صاحب خیبر پختونخوا پشاور

16
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درخواست ہے کہ 05-12-2022 کو اپنے محکمہ پولیس سے مجھے DISMISS کیا تھا۔ جس کے خلاف میں نے

RPO صاحب کو اپیل کی تھی لیکن انہوں نے 25-05-2023 خارج کیا اس کے بعد میں نے IG صاحب کو

درخواست دی تھی۔ اگر اس پر کوئی کارروائی ہو چکی ہوں۔ تو اس کی ایک کاپی مجھے مہیا کریں۔

العرض عجب خان

عجب خان کاشمیل نمبر 52 ضلع تورغر

7-11-2023



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

No. S/ 2032 /23, dated Peshawar the 09/08/2023.

To : The Regional Police Officer,
Hazara at Abbottabad.

Subject: REVISION PETITION.

Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-FC Ajab Khan No. 52 of District Torghar, against the punishment of dismissal from service awarded by DPO Torghar vide OB No. 285, dated 05.12.2022 being badly time barred.

The applicant may please be informed accordingly.

Afsar Jan
9/8/23
(AFSAR JAN)

Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

JP, 7-11-2023

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SCANNED
K.P.S.
Peshawar

VAKALAT NAMA

NO. _____/2023

IN THE COURT OF KP Service Tribunal, Peshawar

Ajab Khan (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Police Department (Respondent)
(Defendant)

I/We, Ajab Khan

Do hereby appoint and constitute **TAIMUR ALI KHAN, ADVOCATE HIGH COURT**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2023

آجان خان
(CLIENT)

ACCEPTED

Taimur Ali Khan
TAIMUR ALI KHAN
Advocate High Court

BC-10-4240
CNIC: 17101-7395544-5
Cell No. 03339390916