IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHWAR

Reshawar

Service Appeal No. 2427/2023

...Appellant

Raqeeb Khan, Ex-FC Elite Force

Versus

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VIAZ MUHAMMAD)

DSP Legal Elite Force, Peshawar

23.04-224 S-B Peshawari

BEFORE THE HOUNRABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWER

Raqeeb Khan Ex-FC / Elite Force	<u> </u>	Appellant	Khyber Pakhtuking
	Versus	•	Diary No. 11846
Addl: IGP Elite Force Khyber Pakhtunkhwa	a Peshawar and others		Dated 20-03 2024

.....Respondents

PARAWISE COMMENTS BY RESPONDENTS NO. 1 TO 3

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:-

- a) That the appellant has got no locus standi to file present appeal.
- b) That the appeal is bad for mis-joinder and non-joinder of necessary parties.
- c) That the appellant is estopped by his own conduct to file the instant appeal.
- d) That the appellant has not come to this Hon'ble Tribunal with clean hands.
- e) That the appellant has got no cause of action to file the present appeal.
- f) That the appellant is concealing real facts from this Hon'ble Tribunal.
- g) That the appeal is barred by law and limitation.

FACTS:

- 1) Pertains to record, needs no comments.
- 2) Pertains to record, however, every Police officer is under obligation to perform duties with honesty and fidelity.
- 3) Pertains to record, needs no comments.
- 4) Incorrect and baseless. Factual position is that a criminal case vide FIR No. 388/2022 u/s 395/337-A(1) 412/397 PPC was registered in PS Shehzad Town Islamabad. During the course of investigation, accused Ilyas s/o Zarab khan r/o Tarnab charsadda was arrested who during interrogation disclosed regarding the appellant being accomplice in the offence. Subsequently, arrested by the Police of the PS Shehzad Town Islamabad and the stolen property was also recovered from him. Apart from it Rs.10000/- received by appellant to be his share of the snatched amount was also recovered from his possession. The charge sheet coupled with statement of allegations (Annexures 'A' & 'B') issued to the appellant. Inspector Muhammad Nawaz Khan District Commander, Elite Force, Swabi was appointed as enquiry officer to scrutinize the conduct of the appellant. The enquiry officer after fulfillment of all codal formalities, conducted the enquiry and submitted findings (F/C) wherein, the appellant was found guilty of gross misconduct and he was recommended for major punishment. After receipt of enquiry findings, the appellant was served with Final Show Cause Notice (F/D) through Superintendent

District Jail Rawalpindi vide No. 771/EF dated 21.12.2022 to which the appellant badly failed to submitted his written reply. All this established that appellant had committed criminal offence and having criminal mind is not attribute of a member of the Police discipline Force. Police has such its prime responsibility to protect the life and property of the general public, activities of the appellant, however, are contrary to the duties of the Police, therefore he was awarded the major punishment of dismissal from service vide Order No 245-50/EF dated 20.03.2023 (F/E) by the competent authority which is in the accordance with law/rules.

- 5) Pertains to the record of the Hon'ble Court, however, there are authorities of the Apex Court according to which departmental and criminal proceeding are distinct in nature and both can run side by side. Criminal proceedings have no binding effect over departmental proceedings.
- 6) Correct to the extent that the appellant after his involvement in criminal offence was proceeded against departmentally as per law/ rules. Hence, the guilty of misconduct, he was dismissed from service by the competent authority as per law/ rules.
- 7) Correct to the extent of departmental appeal. However, same is liable to be dismissed being devoid of merits.
- 8) Irrelevant, needs no comments.
- 9) That the appellant has been treated in accordance with law/ rules being held guilty of gross misconduct. Therefore, the instant Service Appeal being devoid of merits is liable to be dismissed on the following Grounds.

GROUND:

- A) Incorrect, the competent authority after observance of all codal formalities passed order dated 20.03.20233 in accordance with law./ rules.
- B) Incorrect, proper departmental enquiry was conducted against the appellant. Charge sheet coupled with statement of allegations issued to the appellant and enquiry was entrusted to the district Commander, Elite Force Swabi. During the course of enquiry, the appellant was afforded an opportunity of personal hearing, however, the appellant badly failed to extend any cogent explanations in rebuttal of charges. Therefore, the enquiry officer after completion of all aspects held the appellant guilty and he was recommended for major punishment.
- C) Incorrect as already explained above that charge sheet coupled with statement of allegations to the appellant. Inspector Muhammad Nawaz Khan District Commander, Elite Force, Swabi was appointed as enquiry officer to scrutinize the conduct of the appellant. The enquiry officer after fulfillment of all codal formalities, conducted the enquiry and submitted findings wherein, the appellant was found guilty of gross misconduct and he was recommended for major punishment. After receipt of enquiry findings, the appellant was served with Final Show Cause Notice through Superintendent District Jail Rawalpindi vide No. 771/EF dated 21.12.2022 to which the appellant badly failed to submitted his written reply. All this established that appellant had committed

criminal offence and having criminal mind is not attribute of a member of the Police discipline Force. Police has such its prime responsibility to protect the life and property of the general public, activities of the appellant, however, are contrary to the duties of the Police, therefore he was awarded the major punishment of dismissal from service vide Order No 245-50/EF dated 20.03.2023 by the competent authority which is in the accordance with law/rules

- D) Incorrect as the appellant was fully associated with the inquiry proceedings as explained in the preceding Paras.
- E) Incorrect as already explained vide above Paras.
- **F)** As replied in above paras.
- H. Respondent department may also be allowed to raise additional grounds at the time of arguments.

It is, therefore humbly prayed that the appeal may kindly be dismissed with cost.

Superintendent of Police, RRF, Mardan Region, Mardan (Respondent No. 2) (MURAD KHAN) Incumbent

Deputy Commandant, Elite Force, Khyler Pakhtunkhwa, Peshawar (Respondent No. 3) (ABDUS SAMAD) PSP Incumbent

Additional Inspector General /Commandant Elite Force, Khyber Pakhtunkhwa, Peshawar (Respondent No. 1)

(MUHAMMAD WISAL FAKHAR SULTAN) PSP

Incumbent

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHWAR

AUTHORITY LETTER

I, Main Niaz Muhammad (DSP) Elite Force Khyber Pakhtunkhwa Peshawar) do hereby solemnly affirmed that the contents of these joint parawise comments on behalf of Respondents No. 1 to 3 are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Deputy Commandant
Elite Force, Khyler Pakhtunkhwa Peshawar
(Respondent No. 3)
(ABDUS SAMAD KHAN) PSP

Incumbent .

Superintendent of Police, RRF, Mardan Region, Mardan (Respondent No.2) (MURAD KHAN)

Incumbent

Additional Inspector General / Commandant
Elite Force Khyber Pakhtunkhwa,
Peshawar
(Respondent No. 1)
UHAMMAD WISAL FAKHAR SULTAN)

(MUHAMMAD WISAL FAKHAR SULTAN) PSP Incumbent

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHWAR

AFFIDAVIT

I, Abdus Samad Khan Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar responded No. 3) do hereby solemnly affirmed that the contents of these joint parawise comments on behalf of Respondents No. 1 to 3 are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense has been struck off.

Elite Force, Khyber Pakhtunkhwa
Peshawar
(Respondent No. 3)
(ABDUS SAMAD KHAN) PSP



D.No. 1848 Government of Khybord

Government of Khyber Pukhtunkhawa

Office of the Superintendent of Police Elite Force Mardan Region-1, Mardan.

Phone No. 0937-9230699 E-Mail Address: - spelitemardan@gmail.com

CHARGE SHEET.

- I, Muhammad Rauf, Superintendent of Police, Elite Force/RRF Mardan Region, as competent authority, hereby charge Constable Raqeeb No 3466, while posted at Elite Force Platoon No 20 District Charsadda (now under suspension Elite Headquarter Peshawar), as per attached Statement of Allegations.
- 1. By reasons of above, your appear to be guilty of misconduct under Police Rules. 1975 and have rendered yourself liable to all or any of the penalties specified in Police Rules. 1975.
- 2. You are therefore, required to submit your written defense within 07 days of the receipt of this Charge Sheet to the Enquiry Officer, as the case may be.
- 3. Your written defense if any should reach to the enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put—in and in that case an ex-parte action shall be taken against you.
 - 4. Intimate whether you desired to be heard in persons.

5. A statement of allegation of enclosed.

(MUHAWMAD RAUE) Superintendent of Police, Elite Force/RRF Mardan Region.

1 ingred

Government of Khyber Pukhtunkhawa

Office of the Superintendent of Police Elite Force Mardan Region-I, Mardan.

> Phone No. 0937-9230699 E-Mail Address: - spelitemardan@gmail.com

No 475 /EF

dated 25/08/2022

DISCIPLINARY ACTION.

I, Muhammad Rauf, Superintendent of Police. Elite Force/RRF Mardan Region, as competent authority, hereby charge Constable Raqeeb No 3466 has rendered himself liable to be proceed against as he committed the following acts/omission within the meaning of Police Rules, 1975.

STATEMENT OF ALLEGATIONS.

Whereas, Constable Raqueb No 3466, while posted at Elite Force Platoon No 20 District Charsadda (now under suspension Elite Headquarter Peshawar), has been charged in case vide FIR No 388 dated 09.06.2022 u/s 395 PPC PS Shahzad Town Islamabad.

For the purpose of scrutinizing the conduct of the said Officer with reference to the above allegations, the below enquiry Officer is herby appointed:

1) <u>Inspector Muhammad Nawaz Khan, District Commander Elite</u>
<u>Force/RRF Swabi.</u>

The Enquiry Officer shall in accordance with provision of the Police Rules 1975, provides reasonable opportunity of hearing to the accused Police Officer, record/submit his findings and make within (25 days of the receipt of this order/submit his findings and make within (25) days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused officer.

FC Rageeb No 3466 is directed to appear before the enquiry Officer

on the date, time and place fixed by the enquiry Officer.

(MUHAMMAD RAUF) Superintendent of Police,

Elite Force/RRF Mardan Region.

(6)

الكوائرى برخلاف كنسبيل رفيب نبر 3466 ياييك تورس بلانون نمير 20 عارسدة

PPC (397,412،337 A.1, 337 A.) عطان شتم ادثاون اسلام آباد ملوث ہوکر بحوالدارڈ رغمبری PPC (397,412،437 A.) در ال 2022-06 -22 معطل ہوا۔ قد کورہ کو جناب SP صاحب ابلیت فورس مردان نے چارج شیت نمبسری 475/EF

انگرائزی میں بنور دور 2022 و 90-30 کونسٹیبل رفیب نے جارج شیٹ جاری شدہ پر بیان دیا کہ اس کوروران تفیق بین مقد دریش اوٹ کیا جاچ کا ہے۔ اُسکے خلاف الزامات میں کوئی صدافت نہیں ہے۔ اپنی بے گنا ہی جلر ثابت کرونگا۔ جواب و بے تک و موری میں بیری کا بھا کے انتظام کرنا بیان کیا۔ (بیان ہمراہ لف ہے)۔

Muse

انگوائری ٹیں گنشتیل رقیب نمبر 3466 کے CDR کامطالعہ کیا جا کرمعلوم ہوا کہ بروز وقوعہ بوفت تقریبا 6:30 ہے

(جانانان المراه الفري) (CD) المراه الفري

بخوالي ليش نيس ين 704/EF موري 10.11.2022 جناب SP صاحب المين فورس سردان ريجي في مقد سيكي ياً من أدي أسلام آباد CIA عن طلب كي مجتول في البيتي بيا أكرس رافيات بين مقدمه كي تمام حالات كالنسلي الأركيا أربي رو منز سکنسٹیبلان بعدجسسانی ریمانڈ کل 13 ایوم چالان عدالت ہو کرجیل جانچکے ہیں۔ مذید ذکر کیا کہ دوران تفنیش ہردونوں نے داردات كرنے كا كاشاف كياہے۔ (پرائرس رپورٹ بھراه لف نے)

فَأَ مَنْهُ مَنْكُمْ مَكُوبِهِ مِنْ اللَّهِ الرِّي ہے پایا گیا کہ ہردوکنشیبلان بحوالہ مد 11روز نامچہ 2022-08-12 کو جار سدہ ہے نیبر جانس ۔ ۔۔۔اور توالہ مد80 رفز نامچہ 2022-08-17 کو حاضر آئیں (کل 05) یوم اور دو بارہ ایلیت ہُیڈ کوار ترہے ہر دونوں بحوالہ مد 26 َ ﴾ ي 2021-88-31 ت بدمتورغير حاضر ہے۔ بعنی اُوٹل غير حاضري کے تقريباً چار مہينے ہو چکے ہيں۔ (نقلومدات انسراہ لف ہے) انگوانزگی مین تمام کاغذات کامطالعه کرنے ، واقعات ، شناخت پریڈ ، CDR ، انکشاف جرم اور یَکْرَشْتیش سے نابت رہ آئے۔ معلم رقیب نمبر 3466 بلیٹ فورس پاکون نمبر 20 حیارسدہ واقعی اینے بھائی مسمی البیاس کے ماتھ جرم بیس اثر کیے۔ رہا ہے۔ اور تقرياً 04 مينے سے ذياده غرصات بدستورغير حاضر ہے۔لہذالنشيل مذكوره بالاكو"MIAJOR"مزادیت كی مقارش كی جاتی ہے۔

13 rough السبكيرة نشركت كما تذرا بأبيت بورس 19-12-2021

Reader issue Final Show gave notice.

> 医医红红皮属 20-12-2022

> > M.

Covernment of Kinyber Pukhtunkhawa

Office of the Superintendent of Police Elite Force Mardan,Region-I, Mardan.

Phone Ne 1937-9230699

E-Mail Address: - so itemardan/agmail.com

No 774 /El

FINAL SHOW CAUSE NOTICE.

Dated 21/12/2020

WHEREAS, You Constable Rageeb No 3466, while posted at Flite Force Planoon firmisfrier Charsadda were found guilty as under-

Being charged in case vide FIR No 388 dated 09.06.2022 u/s 395 PPC PS Shehzad Town Islamabad.

For the purpose of secutinizing your conduct, departmental enquiry was conducted through lisspector Sawaz Khan District Compander Elite Force/RRF Swabi. The enquiry capera reveilled that you were provided full-fledged exportanity to explain your position but you failed to pastally-volur innocence.

And whereas, I am satisfied the you had committed misconduct and as public of negligenee and carelessness, which stand proves and rendered you liable to be asympted punishment ander the Klipber Pakhtimkhwa Police Rules 1975 as amended 2014.

Now therefore, I. Winhamman Runt, Superintendent of Police Elite Porce RRS Martina Region, as Competent Authority has ientatively decided to impose upon you, any one or more penalties including the penalty of "dismi-Al from service" under Kule 5. Sub K do 5. Chares 258 B of the Khyber Pakhtunkhwa Police Rules 1975 as amended 2014.

You are, Therefore, required to submit reply of this Final Show Lause within services days of the receipt of this notice, as to why the situresaid penalty or any other through performan upon you, failing which it shall be presumed the, you have no defense to offer and an exepant, across half he tale in against you. Meanwhile you also caimate that whether you desire to be heard in

netset or effective

Superinvendent of Celue. Elite Force/RRF Warden Region.

Daide

1948 21-3-23 Commandent Elite Force

Government of Khyber Pukhtunkhawa

Office of the Superintendent of Police Elife Force Mardan Region-I, Mardan.

Phone No. 0937-9230699

E-Mail Address: - spelitemardan@gmail.com

ORDER

This order will dispose off the departmental enquiry under Police Rules 1975 against Constable Raqeeb No.3466, Elite Platoon No.20 District Charsadda, on the allegations that he while posted at Elite Platoon No.20 at District Charsadda, found involved in case FIR No.388 dated 09.06.2022 u/s 395/397/412/337A1/337FVPPC Police Station Shahzad Town Islamabad. The defaulter official was also placed under suspension vide this office order No.459-62/EF dated 22.08.2022.

To the ascertain real facts, the delinquent officer was proceeded against departmentally though Inspector Nawaz Khan District Commander Elite Force Swabi vide this office charge sheet and statements of allegations No.475/EF dated 25.08.2022, the enquiry officer after fulfillment of all legal and codal formalities submitted his finding report wherein he held responsible the delinquent officer for misconduct and recommended him "Major Punishment".

In this connection, he was issued Final Show Cause Notice through Superintendent Jail Rawalpindi vide this office No.770/EF dated 21.12.2022, to which the delinquent officer (Under Custody), has failed to submitted his reply, which clearly shows that he has nothing to offer in his defense.

Keeping in view the above circumstances and the exercise of powers vested to me under the Khyber Pakhtunkhwa Police Rules 1975 as amended 2014. I Muhammad Rauf Superintendent of Police Elite Force Mardan Region, being the competent authority hereby award Major Punishment of "Dismissal from service" to Constable Raqueb No.3466, Elite Platoon

No.20 District Charsadda with immediate effect.

(MUHAMMAD RAUF)
Superintendent of Police,
Elite Force/RRF Mardan Region.

No 245-50 /EF.

Date: スローノゆ3 /2023.

Copy is forwarded for information and necessary action to:-

1. The Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.

2. PSO to Addl: IGP Commandant Elite Force, Khyber Pakhtunkhwa. Peshawar.

3. Accountant Elite Force, Khyber Pakhtunkhwa, Peshawar.

4. *OASI/SRC Elite Force, Khyber Pakhtunkhwa, Peshawar.

5. FMC Elite Force, Khyber Pakhtunkhwa, Peshawar along with complete Original departmental enquiry file Encls: (31) Pages.

6- constabil Rageeb No. 3466

May)

j:

يوليم، قارم أمير 24-5 (1)

03075

ابتدائی اطلای ربورث نسبت برم 6 عل دست اعدازی بولیس دبورث شره زر دفد 154 مجومه شایط توسدادی

عرق برت دار : <u>108-06-2022 09:30 PM</u>

ST-6/9/2022-2035 : الله على: الملام أباد الل في أمر: 384/2/2022

يخالدنيك فيم (31). 00-06-2022 09:05 PM اً . عرق ووقت رايورت

2 - ۲۱ و سكونت اطفاره وبشوه مستنفيت

3 المخفر كيفيت جرم (مند دفعه) وبال وكر بكم محوميل ب



502-ID

جاست وتوند وفاصل فخاند سبراؤد م

Mumtaz Balg

كاروال حللة الليش الر الليال ورق كرا على مك وقي عداد أو الل كا وجد يوال كل

<u> آمف اقال دلد بمبائر خان، چه زاش ش تحميل و شن املاء آيان</u> <u> 16102-2328323-5: في نجر: 16103-3340091978</u>

سروقه 4 عدد موباكل قول كل مايكن 105000 150000 نظ كيش 22 سد ATM كارة ا CAP رجستر يش كاراً . 2 مردا مل فافتي كارد ، اسلم الانجسس، امن الطبي اساد. كل المين -آعدار() - ثبت - 255000

عمر وقير باطل على إفاصل قريب 1/2 كلو معر بجاب الله الا قالة

حسب آنه تريري در واست تقديد دري وجسر موا

اللي فيان <u>تمير:</u>

(ابتدال المال في ورج كري)

پخدمت جناب SHO صاحب تماند شنزاد جون اسلام آیاد درخواست عرز و الدمائ مقدم / FIR مثالث طرمان جناب دائل اصائل حسب ذیل عرض دسال ہے اسے کہ سائل پاکسٹان فرسنگ کوشل اصلام 03465082402 آباد شن بنور کیو در برد آرام 81-888 می طاومت کرج به اور آن این ۱۵/06/22 یوف تقریباً 9:30PM رات ساکل اینچه کر داخ بادی ۱۵۲۰ تی تجریها اور باش کی اسلام آباد می حوجو: آنا اور میرست ساتھ میرا پومیا ارسالان اور اسکا دوست سواز مین سرود سے 2۔ کہ کہ ای انٹار میں 60 اشاص طبیان مسلم بلٹی فیروسی میرسے تحریص تھی آنے اور آنے ساتھ ای میرانام بے پیا ا کہ آئیب آئیف فٹک ٹل اور شاختہ ہوسف پر ساکن سنے 92 عدد موہائل فون NOKIA اور S-21 اور پرس جمن شیریا 70 بڑادر دوپ شاخی کاوڑ الحدا کیونگ کاکسٹس واغی ویمٹس 63 عدد ۱۹۱۸ مثال ستے زبروی برور اسلی تھیں سلے 3۔ یہ کہ طرفان سے میں اور اورمالان و ساز کو سکوائی فیپ سے باتھ پاول سے باتھ دیا اور میھے زبروی تھیسٹ کر کرے میں الے اور نیجے اواق بكول سے اور پستول كے بت سے برنا شروع كردية ان ش سے ايك طرح / فض فے پستول كا بدل مرس سے ير مجى بدا جك دومرس فريان نے ميراس بادہ كو ويرد كى مرزدا جم سے بادہ اور كاد بي کَ اَلْهُ کَ اُوْت کَل اور چیرسے پر شدید زخم آستے ہے۔ یہ کہ شرمان جاتے ہوئے اپنے ساتھ 12 عدد سیل جین میں اوسان اسد ولد اسفر جان کی تمام اسل تعلی اساد موجود بھی اور اوسان اور ساز کے سوبائل فیز کی دروس تین کر لیٹے ساتھ کے گئے ان آلم طرائ کو سامنے آنے ہے شاہدت کر مکا ہوں 3۔ ہے کہ ان آلم طریان نے میرسے گھر زود کی دا گی ہے کہ او سال اسد اور مناز کو قبل سبه جاء ش رکھ کر شدید تشدہ کا نشانہ بتایا اور زخمی کی اور میرے گھر سے کچی مالان جمل میں موبائل فوز Samaling A31,NOKIA,SAMSUNG A21S,SAMSUNG 921 اور نقل آریا سل RE70.000 روپے (آمف تک ہے) اور سل RE35,000 روپے (اور مال جید ہے) اور معال جی کا در کا اور ATh کار کی تیروسی کی کرنے کے یہ کہ زکورہ بالا بها کر چی سیل 334873303421122032 142611133،03421122032 18 کی کہ دجہ منا د حال بی میں پاکستان فرسک کو نس نے کھومت پاکستان اور مدالمت مالیہ لادور بالل كردے كے عم ير مخلف حالى اور GHOST كالجو كے طاقب تاوى كاروائى ترون كر ركى ہے اور جمل على كالجو كے الكان كے خالف FIA كو كري ورفوائش عج كرواد كيوں جو ا سائل ان تمام معاملات کا فرکل پرس ب اور ویروی کر تاب اس کے علاوو سائل کی کمی ویکر فض سے کوئی وائل و هن و تدارت فیس ہے۔ سائل کو قول ایکن ہے کہ سے وقوم جمل ترسیف کالجز کے مالگان كى مال ياز اور مريرى عن محروليا كيا ب طروان ك طاف قانوني كاروائي على شي الأن جائ اور سائل كو الصاف فراجم كيا جائے ۔جناب كي فواتو ، بوكي العارض و سخط بحروف القريري مائل أسحف البال دلد كيا كر قال كت إسل من تحصيل و على اسلام آباد شاخى كارو أبير 1610223283235 رتبل فير 08.05.22 كادون كالديك الله من عامري تقايد تحريري دو تواست تَرْنَ کَ جَرْ ترف بِرَف وَرَحْ بِالا بولَى مَعْمُون ورتحوامت و حالات واقعات سند مروست جرم 395 من بالى جاكرد الإراب الله كا بجرم لذكور مرحب اول جناب SHO ساحب علاق قائد عَن الإرا جنو اطلاعً بابت الدوائ مقدمه بذا وي جارى به عرز يعد محلي مرائدة أول علاجهاتها المران مجاز ارسال كرس عن مسروف تعيش مول .

SI Mumtez Beig 09-06-2022