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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR


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Muhammad Fayaz vs Police Department

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Muharir, Compilation


29/5/24
Incharge Judicial Branch

982. Mustafa Kamal Superintendent environment Dept Peshawar
 983. Muhammad Qureshi Superintendent C&W Dept Peshawar
 984. Jehanzeb Superintendent Home Dept Peshawar
 985. Muhammad Aslam s/o: Sher Bandi Khan Superintendent Governor House Dept Peshawar
 986. Sultan Shah Superintendent E & AD Dept Peshawar
 987. Nooreen Kayani Superintendent population Welfare Dept Peshawar
 988. Umar Gul Afridi Superintendent E & AD Dept Peshawar
 989. Shah Wali Khan s/o: Khoidad Khan Superintendent CM Secretariat Dept Peshawar
 990. Ghulam Mustafa Halder Superintendent Finance Dept Peshawar
 991. Abdul Qadeem Superintendent E & AD Dept Peshawar
 992. Ayan Shah Superintendent E & AD Dept Peshawar
 993. Zahir Shah s/o: Lal Muhammad Superintendent E & SE Dept Peshawar
 994. Fazli Ihsan s/o: Fazli Wahid Superintendent Finance Dept Peshawar
 995. Syed Obaidullah Shah Superintendent Environment Dept Peshawar
 996. Abdul Khaliq Superintendent CM Secretariat Dept Peshawar
 997. Abdul Latif s/o: Ibrahim Khan Superintendent Finance Dept Peshawar
 998. Ifthikhar s/o: Abdul rauf Superintendent Labour Dept Peshawar
 999. Badri Zaman Superintendent E & AD Dept Peshawar
 1000. Amjad Ali Superintendent Sport Dept Peshawar
 1001. Zelle Ali Haidari Superintendent Home Dept Peshawar
 1002. Zahidullah s/o: Naqibullah Khan Superintendent C&W Dept Peshawar
 1003. Asim Anwar Superintendent Finance Dept Peshawar
 1004. Manzoor Ahmad s/o: Sher Muhammad Superintendent ST&IT Dept Peshawar
 1005. Shah Faisal Khan Superintendent Mineral Dept Peshawar
 1006. Muhammad Yasir Superintendent KP Culture Tourism Dept Peshawar
 1007. Saeeda Khan Superintendent Food Dept Peshawar
 1008. Neelam Superintendent Finance Dept Peshawar
 1009. Burhan ud Din Superintendent EMA Dept Peshawar
 1010. Sidra Ahmad
 1011. Noor sher
 1012. Majid Hanan Lodhi Superintendent E & AD Dept Peshawar
 1013. Laeeq Ahmad Superintendent law E & AD Peshawar
 1014. Mustajabul Haq Superintendent Social Welfare Dept Peshawar
 1015. Farman Ali Superintendent Health Dept Peshawar
 1016. Wazir Muhammad Superintendent Finance Dept Peshawar
 1017. Zafarullah s/o: Arsala Superintendent Irrigation Dept Peshawar
 1018. Syed Farooq Shah Superintendent Admn Dpt Peshawar
 1019. Shakeel Ahmad Superintendent Finance Dept Peshawar
 1020. Farah Seyar Superintendent E & AD Dept Peshawar
 1021. Shaid Iqbal Superintendent Finance Dept Peshawar
 1022. Mohsin mushtaq Superintendent E & AD Dept Peshawar
 1023. Muhammad Noman Superintendent E & AD Dept Peshawar
 1024. Saman Zaman Superintendent Finance Dept Peshawar
 1025. Huma Bakhtiar Superintendent P & D Dept Peshawar
 1026. Muhammad Kaleem Jan
 1027. Usman Khan s/o: Aziz
 1028. Asmat Ullah s/o: Ayub Khan
 1029. Syed Sardar Badshah
 1030. Aamir Shahzad Khattak
 1031. Syed Muhammad Ihsan Superintendent mineral Dept Peshawar
 1032. Muhammad Sohail Superintendent Home Dept Peshawar
 1033. Sitwat Superintendent Energy & Power Dept Peshawar
 1034. Muhammad Saleem Superintendent energy & power Dept Peshawar
 1035. Muhammad Shafiq Superintendent Health Dept Peshawar
 1036. Ijaz Muhammad Superintendent Sport Dept Peshawar
 1037. Syed Akhtar Ali Shah Superintendent Finance Dept Peshawar
 1038. Adnan yousaf Muhammad Aqeel Superintendent Home Dept Peshawar
 1039. Adnan Shaukat Ali Khan
 1040. Asif Nabil Superintendent PSRA Dept Peshawar
 1041. Muhammad Aslam Superintendent Finance Dept Peshawar
 1042. Imran Saleem Superintendent Finance Dept Peshawar
 1043. Shah Jehan Superintendent Agriculture Dept Peshawar
 1044. Sartaj Khan Superintendent Relief Dept Peshawar
 1045. Sohbat Khan Superintendent E & SE Dept Peshawar
 1046. Flizza Hassan Saeed d/o: Hassan Saeed Ahmad Shah

Petitioners

Versus

1. Hanif ur Rahman, Assistant (BPS-16), Directorate of Prosecution Khyber Pakhtunkhwa.
2. Government of Khyber Pakhtunkhwa through its Chief Secretary at Civil Secretariat Peshawar and others.
3. Government of Khyber Pakhtunkhwa through Secretary Finance Department at civil secretariat Peshawar.
4. Secretary Administration and Establishment civil Secretariat Peshawar.

Secy (Litigation)
 of AP

Respondents Establishment Department

Arshad Khan

①

Service Appeal No.978/2019 filed "Muhammad Fayaz versus The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others", decided on 06.05.2024 by Division Bench comprising of Mr. Kalim Arshad Khan Chairman and Mr. Muhammad Akbar Khan, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Peshawar

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

BEFORE: **KALIM ARSHAD KHAN ... CHAIRMAN**
MUHAMMAD AKBAR KHAN ... MEMBER (Executive)

Service Appeal No.150/2019

Date of presentation of Appeal.....29.01.2019
Date of Hearing.....06.05.2024
Date of Decision.....06.05.2024

Mr. Muhammad Fayaz, Ex-Constable No.511, Police Lines,
District Swabi.....(*Appellant*)

Versus

1. **The Inspector General of Police**, Khyber Pakhtunkhwa, Peshawar.
2. **The Regional Police Officer**, Mardan.
3. **The District Police Officer**, District Swabi.....(*Respondents*)

Present:

Mr. Umar Farooq, Advocate.....For the appellant
Mr. Asif Masood Ali Shah, Deputy District Attorney.....For respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 15.01.2018 WHEREBY THE APPELLANT HAS BEEN DISMISSED FROM SERVICE AND AGAINST THE APPELLATE ORDER DATED 01.01.2019 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS.

JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: Brief facts of the case are that appellant was appointed as Constable in the Police Department and was serving as Constable; that he was convicted in FIRs No.53, 54 & 55 under Section 381-A/411 on different dates and was arrested accordingly; that he was acquitted in the mentioned FIRs on the basis compromise; that after acquittal, the appellant approached the department, where, he was handed over the impugned removal order dated 15.01.2018; that feeling aggrieved,

SCANNED
SKPST
Peshawar

Service Appeal No.978/2019 titled "Abdunnasir Fayaz versus The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others", decided on 06.05.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mr. Mohammad Akbar Khan, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

he filed departmental appeal, which was rejected vide order dated 01.01.2019, hence, the instant service appeal.

2. On receipt of the appeal and its admission to full hearing, the respondents were summoned. Respondents put appearance and contested the appeal by filing written reply raising therein numerous legal and factual objections. The defense setup was a total denial of the claim of the appellant.

3. We have heard learned counsel for the appellant and learned Deputy District Attorney for respondents.

4. The learned counsel for the appellant reiterated the facts and grounds detailed in the memo and grounds of the appeal while the learned Deputy District Attorney controverted the same by supporting the impugned order(s).

5. It is evident that it is the case of the appellant that he was penalized by the departmental authorities on the sole ground of his involvement in different criminal cases registered vide FIRs No.53, 54 & 55 in Police Station Utlā. He contended that he had been acquitted in the criminal cases, therefore, he ought to have been reinstated into service. Besides, involvement in the criminal cases, the appellant remained absent from duty w.e.f 05.11.2017 till passage of dismissal order. The first FIR was shown to have been registered against the appellant on 03.12.2017 and the appellant was absent prior thereto. The absence from 05.11.2017 to 03.12.2017 is admitted by the appellant but with the contention that he had fallen ill. There is, however, no application placed on file for obtaining medical leave nor such fact has been disclosed anywhere in the appeal. The appellate order

Service Appeal No.978/2019 titled "Muhammad Fayaz versus The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others", decided on 06.05.2024 by Division Bench comprising of Mr. Kalim Arshad Khan, Chairman, and Mr. Muhammad Akbar Khan, Member Executive, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

shows that during hearing of the departmental appeal, the Regional Police Officer, Mardan had summoned the Officer Incharge of the criminal cases alongwith the case files to ascertain the facts. The Officer Incharge had confirmed involvement of the appellant in stolen property cases and also disclosed that during investigation of the cases, the stolen property was recovered from the possession of the appellant, therefore, acquittal of the accused in a non-compoundable case of moral turpitude on the basis of concessional statement made by the complainant of the case, would of its own ^{not Q} absolve the appellant from the liabilities or disciplinary action initiated by the department, which could run separately and the outcome of the same, at times, is not interdependent as in the present case. True that the appellant might have been acquitted in the criminal case but on the basis of concessional statement of the complainant but recovery of the stolen property from him and repetition of the same offence seems to be one of the reason of departmental action besides admitted absence of the appellant.

6. For what has been discussed above, this appeal has no merit and is dismissed. Costs shall follow the event. Consign.

7. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 6th day of May, 2024.*

KALIM ARSHAD KHAN

Chairman

MUHAMMAD AKBAR KHAN

Member (Executive)

SCANNED
BY
KPS
KPS

4
S.A #.150/2019

ORDER

- 6th May: 2024
1. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.
 2. Vide our detailed judgment of today placed on file, this appeal has no merit and is dismissed. Costs shall follow the event. Consign:
 3. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 6th day of May, 2024.*



(Muhammad Akbar Khan)
Member (E)



(Kalim Arshad Khan)
Chairman

Mutazem Shah
SCANNED
KPST
Peshawar


23.11.2023


Appellant alongwith his counsel present. Mr. Waqar Ahmad, S.I alongwith Mr. Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant seeks some time for preparation of arguments. Adjourned. To come up for arguments on 10.01.2024 before the D.B. Parcha Peshi given to the parties.

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Naeem Amin


(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)

10.01.2024 1. Learned counsel for the appellant present. Muhammad Jan learned District Attorney for the respondents present.

2. Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the case. Adjourned. To come up for arguments on 06.05.2024 before D.B. P.P given to the parties.

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*Kaleemullah



(Rashida Bano)
Member (J)

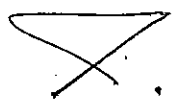

(Kalim Arshad Khan)
Chairman

15.05.2023

Junior of learned counsel for the appellant present.
Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant has proceeded to hospital due to emergency. Adjourned. To come up for arguments on 08.08.2023 before the D.B. Parcha Peshi given to the parties.


(Muhammad Akbar Khan)
Member (E)



(Salah-ud-Din)
Member (J)


Naeem Amin

08.08.2023

1. Learned counsel for the appellant present. Mr. Fazal Shah Mohmand. learned Additional Advocate General for the respondents present.

2. Learned counsel for the appellant is directed to submit on the next date detail regarding date of arrest, bail and the period during which he remained absconded. Adjourned. To come up for production of record as well as arguments on 23.11.2023 before D.B. P.P given to parties.


(Fareeha Paul)
Member (E)


(Rashida Bano)
Member (J)

*KaleemUllah

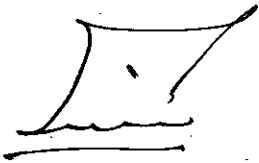
27th Feb. 2023

Learned counsel for the appellant present. Mr. Naseerud Din Shah, Assistant Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made further preparation for arguments. Adjourned. To come up for remaining arguments on 13.03.2023 before the D.B. P.P given to the parties.

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(Farzana Paul)
Member(E)



(Salah-ud-Din)
Member (J)

13th March, 2023

Appellant alongwith his counsel present. Mr. Muhammad Jan, Deputy District Attorney for the respondents present.

Learned counsel for the appellant seeks further time for preparation of arguments. Adjourned. To come up for arguments on 15.05.2023 before the D.B. Parcha Peshi given to the parties.

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Peshawar


(Salah-ud-Din)
Member (J)



(Kalim Arshad Khan)
Chairman


01st Dec. 2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan Painsdakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Last opportunity is granted. To come up for arguments on 15.02.2023 before the D.B.

SCANNED
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Peshawar



(Fareeha Paul)
Member (E)

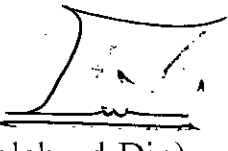

(Rozina Rehman)
Member(J)

15.02.2023

Learned counsel for the appellant present. Mr. Fazle Subhan, Head Constable alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Partial arguments heard. To come up for remaining arguments on 27.02.2023 before the D.B.


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

08.04.2022

Counsel for the appellant present Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Learned AAG seeks adjournment. Last chance is given. To come up for arguments on 12.07.2022 before D.B

(Mian Muhammad)
Member(E)

Chairman

12-7-2022

Due to Holidays of Eid Ul Azha
the case is adjourned to 26-10-2022

Reader

26.10.2022

Appellant in person present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that his counsel is not available today due to strike of lawyers.

Adjourned. To come up for arguments before the D.B on

01.12.2022.

(Mian Muhammad)
Member (E)

(Salah-ud-Din)
Member (J)

SCANNED
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Peshawar

29.07.2021

Appellant alongwith his counsel Mr. Noor Muhammad Khattak, Advocate present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not met preparation for arguments. Adjourned. To come up for the argument before the D.B on 30.09.2021.



(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

30.9.21

Due to non Availability of the concerned DB The case is adjourned to 05-01-2022



05.01.2022

Junior to counsel for the appellant present. Mr. Javed Ullah, Assistant Advocate General for respondents present.

Former made a request for adjournment as senior counsel for the appellant is not available today. Adjourned. To come up for arguments before the D.B on 08.04.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)



Chairman

09.11.2020

Appellant in person present. Zara Tajwar learned Deputy District Attorney alongwith Fazle Subhan H.C for respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 26.01.2021 for hearing before the D.B.



Chairman



(Atiq-ur-Rehman Wazir)

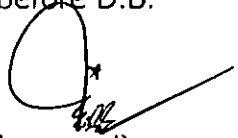
Member (E)

26.01.2021

Junior counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

A request for adjournment was made as issue involved in the instant case is pending before Larger Bench of this Tribunal. Adjourned. To come up for arguments on 13.04.2021 before D.B.



(Mian Muhammad)

Member (E)



(Rozina Rehman)

Member (J)

13.04.2021

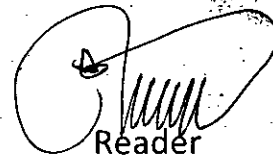
Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 29.07.2021 for the same as before.



READER

27.07.2020

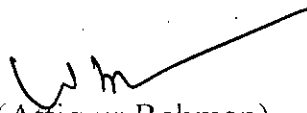
Due to COVID19, the case is adjourned to 01.09.2020 for the same as before.



Reader

01.09.2020

Mr. Usman Ghani learned District Attorney present for the respondents.

Afrasiyab Khan Wazir Advocate junior counsel present on behalf of appellant with a request for adjournment as his senior counsel is busy before Dar-ul-Qaza Swat. Request is acceded being genuine and case is adjourned to 09.11.2020 before D.B. Respondents be put to notice to make sure presence of representative not below Grade-17 on the next date fixed.


(Attiq ur Rehman)
Member (E)


(Rozina Rehman)
Member (J)

07.10.2019

Appellant in person and Addl. AG alongwith Muhammad Faheem, Inspector for the respondents present.

Representative of respondents has furnished written reply, which is placed on record. The appeal is assigned to D.B for arguments on 16.12.2019. The appellant may submit rejoinder, within a fortnight, if so advised.




Chairman

16.12.2019

Learned counsel for the appellant and Mr. Muhammad Jan learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 20.02.2020 before D.B.



Member



Member

20.02.2020

Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney present. Learned counsel for the appellant seeks adjournment. Adjourned To come up for arguments on 20.04.2020 before D.B.



Member



Member

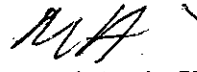
Due to Covid, 19. the case is adjourned. To come up for the same on 27-7-2020



Reader

20.06.2019


14
Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG for the respondents present. Written reply on behalf of respondents not submitted. Learned Additional AG requested for further adjournment. Adjourned to 02.08.2019 for written reply/comments before S.B.


(Muhammad Amin Khan Kundi)
Member

02.08.2019

Counsel for the appellant and Mr. Usman Ghani, District Attorney for respondents present. Written reply/comments on behalf of the respondents not submitted. Learned District Attorney requests for further time to submit written reply/comments.

Adjourned to 11.09.2019 before S.B.


(Ahmad Hassan)
Member

11.09.2019

Appellant in person present. Nemo for the respondents. Fresh notices be issued to the respondents by way of last chance for submission of written reply/comments on 07.10.2019 before S.B.


Chairman

13.03.2019

Counsel for the appellant Muhammad Fayaz present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Police Department. He was imposed major penalty of dismissal from service vide order dated 15.01.2018 on the allegation of absence being involved in criminal case. It was further contended that the appellant was acquitted by the court vide order dated 19.11.2018 therefore, the appellant filed departmental appeal on 12.12.2018 within one month after acquittal which was rejected on 01.03.2019 hence, the present service appeal. Learned counsel for the appellant further contended that neither proper inquiry was conducted nor any absence notice was issued to the appellant at his home address therefore, the impugned order is illegal and liable to be set-aside.

The contention raised by the learned counsel for the appellant needs 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, notice be issued to the respondents for written reply/comments for 29.04.2019 before S.B.

Appellant Deposited Security & Process Fee >

MA
(Muhammad Amin Khan Kundi)
Member

29.04.2019



Counsel for the appellant present. Addl: AG for respondents present. Written reply/comments not submitted. Requested for adjournment. Adjourned. Case to come up written reply/comments on 20.06.2019 before S.B.

AH
(Ahmad Hassan)
Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 150/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/1/2019	<p>The appeal of Mr. Muhammad Fayaz resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 31/1/19</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>13-3-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

17
The appeal of Mr. Muhammad Fayaz Ex-Constable no. 511 Police Line District Sawabi received today i.e. on 29.01.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be flagged.
- 2- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.

No. 187 /S.T,

Dt. 31-1- /2019.

Lawyer
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv.

Note:

Sir,

objection No. 1 has been removed and as to objection no. 2 charge sheet, statement of allegations, show cause notice has not been served on the appellant as well as enquiry has not been conducted in the matter. Hence re-submitted today dated 31/1/2019.

31/1/2019.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. 150 /2019

**SCANNED
KPST
Peshawar**

MUHAMMAD FAYAZ

VS

POLICE DEPARTMENT

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APPELLANT

THROUGH:


**NOOR MOHAMMAD KHATTAK
ADVOCATE**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

APPEAL NO. 150 /2019

Diary No. 127

Dated 29-1-2019

Mr. Muhammad Fayaz, Ex-Constable No. 511,
Police Lines, District Swabi.....

APPELLANT

VERSUS

- 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- The Regional Police Officer, Mardan.
- 3- The District Police Officer, District Swabi.

..... **RESPONDENTS**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED
ORDER DATED 15.01.2018 WHEREBY THE APPELLANT HAS
BEEN DISMISSED FROM SERVICE AND AGAINST THE
APPELLATE ORDER DATED 01.01.2019 WHEREBY THE
DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN
REJECTED ON NO GOOD GROUNDS**

PRAYER:

That on acceptance of this appeal the impugned orders dated 15.01.2018 and 01.01.2019 may very kindly be set aside and the appellant may be re-instated into service with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant was initially appointment as Constable No. 511 in the respondent Department and from the date of first appointment the appellant has performed his duty quite efficiently and up to the entire satisfaction of his superiors.
- 2- That during service the appellant was falsely involved in FIR's Nos.53, 54, 55 and 56 under section 381-A/411, on different dates in Police Station Utlā. That consequently the appellant was arrested by the local police. Copies of the FIR's are attached as annexure **A.**
- 3- That after facing trial in the above mentioned FIR's finally the appellant was acquitted in all the cases by the Concerned Judicial Magistrate, Swabi on the basis of compromise vide judgments dated 18.10.2018, 10.11.2018, 13.11.2018 and 19.11.2018. Copies of the compromise deeds and judgments/orders are attached as annexure..... **B & C.**

Re-submitted to -day
and filed.

Filed to-day
Registrar
29/1/19

Registered
5/1/19

4- That after acquittal when the appellant visited the concerned quarter for his arrival the appellant was handed over the impugned order dated 15.1.2018 whereby the appellant was dismissed from service. That the appellant filed Departmental appeal before the respondent No.1. That the same has been rejected by the concerned authority vide dated 01.01.2019 on no good grounds. Copies of the Impugned order, Departmental appeal and rejection order are attached as annexureD, E & F.

5- That appellant feeling aggrieved and having no other remedy filed the instant appeal on the following grounds amongst the others.

GROUND:

A- That the impugned orders dated 15.01.2018 and 01.01.2019 are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

B- That appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

C- That no charge sheet and statement of allegations has been issued to the appellant before issuing the impugned order dated 15.01.2018.

D- That no show cause notice has been served on the appellant before issuing the impugned order dated 15.01.2018.

E- That no chance of personal hearing/defense has been provided to the appellant and as such the appellant has been condemned unheard.

F- That no regular/fact finding inquiry has been conducted in the matter which is necessary as per law and Rules before taking any punitive action against the civil servant.

G- That the absence of the appellant is not willful but because of the criminal case, therefore under the principle of natural justice the appellant deserved to be re-instated into service with all back benefits.

H- That appellant seeks permission to advance other 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.

Dated: 28.01.2019

APPELLANT


MUHAMMAD FAYAZ

THROUGH:
NOOR MOHAMMAD KHATTAK


MIR ZAMAN SAFI
ADVOCATE

ATTESTED

Handwritten text in Urdu, likely a certificate or affidavit, mentioning dates and names. Includes phrases like "میں نے" (I have) and "دیکھا" (seen).

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4	...
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بیان سید واقف شاہ ولد شاہ نظر خان کنہ
گلباسنی، تحصیل ٹوپی، ضلع صوابی برصغیر۔

18.10.18

بیان کیا کہ میں نے ملزم محمد فیاض ولد حیدر خان کنہ اٹک ٹرون
ضلع صوابی کے خلاف مقدمہ عدالت بند 4 مورخہ 6.10.18 کو تھانہ اٹک
میں اپنے موٹر سائیکل کی سرٹیفیکیٹ کی رجسٹراری کی تھی مگر دو دن بعد مجھے
میرا موٹر سائیکل ہمارے گھر سے ایک کلو میٹر فاصلے پر سنسان جگہ پر روڑ
پر کھڑی تھی اور میں نے موٹر سائیکل کے مٹنے کی اطلاع پولیس کو دی
جو کہ پولیس نے ملزم سے برآمد ہوتا بیان کیا ہے میں عدالت حضور
نسلی کو تیار ہوں کہ ملزم کے قبضے سے مذکورہ موٹر سائیکل برآمد
ہوئی ہوگی اور نہ ہی میں نے ملزم کو چوری کرتے دیکھا ہے۔ ملزم
نے خانگی طور پر اپنی بے گناہی کی نسلی تھی کرائی ہے۔ میں ملزم
کے خلاف مقدمہ چلانا نہیں چاہتا ہوں اور اگر عدالت ملزم کو بائفرت
بری فرمائے تو مجھے کوئی اعتراض نہیں ہوگا۔ بیان حلفی بابت راجن نامہ
دستی و دستاویز EX PA - 4 - ایٹا توپی مارڈ میں کرتا ہو جسکی کاپی
EX PB ہے۔
(سزا خوردہ مستقیم کیا)

سید واقف شاہ ولد شاہ نظر خان

16202-6657223-3

سید واقف شاہ

JM - Swabi

18.10.18

ATTESTED

25/11/18

Magistrate Court Swabi

No of application

11817

Date of presentation of application

20/11/18

Date on which the copy prepared

20/11/18

Date on which the copy issued

20/11/18

Fee in Words

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Signature of Cepvist

20/11/18

1198
18-10-2018
دستور نامہ نظر کنہ گلباسنی ج ضلع صوابی

By Usman Akbar
Judicial Complex Swabi

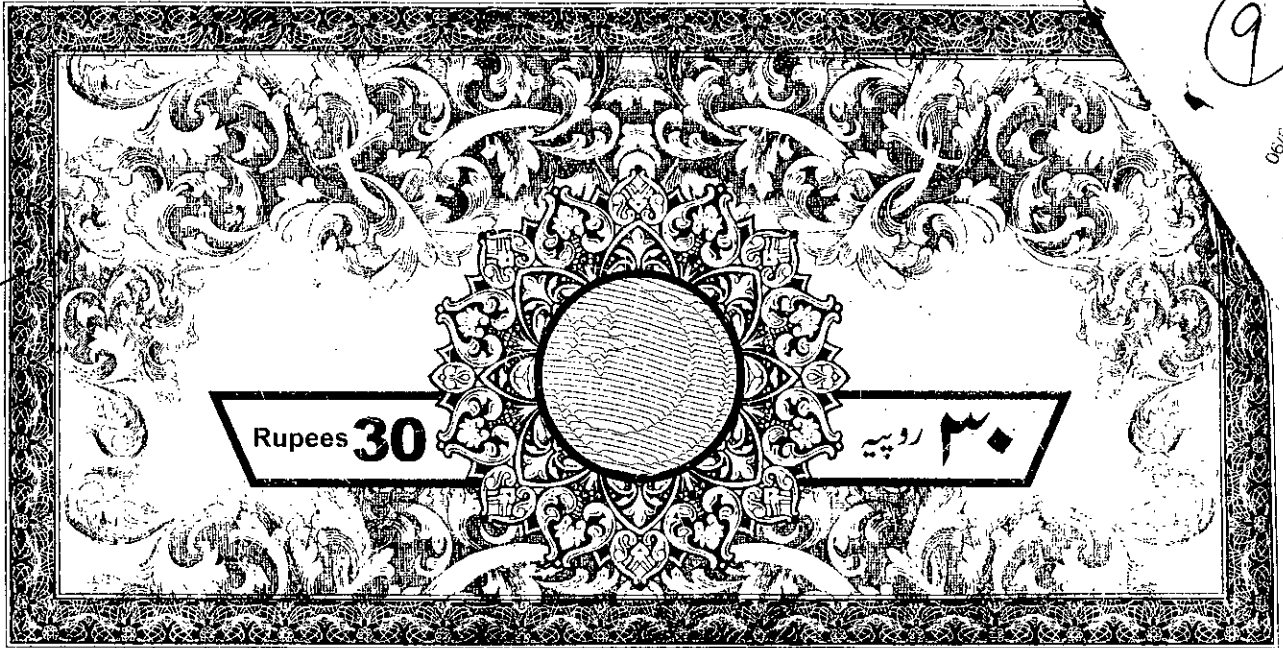
سید واقف شاہ

EX PA Copy
Magistrate Court Swabi

HEAD OFFICE
18/10/2018



9



لی عدالت فوجداری ہوابی

یوٹر خان و پیرہ

بنام

سرکار

تقاضا = آئندہ

381-A
PPC = جرم

معدت نمبر 53
03.12.17

EX PA
JM Swabi
2018

بیان حلقہ

مذکورہ مس عارف سعید ولد شادوس خان سکنہ آئندہ گدون، ضلع ہوابی کا یوں اور اقرار کرتا ہوں
کہ من مقررے بروئے FIR نمبر 53 مورخہ 3.12.17 مجرم 381-A PPC تقاضا آئندہ میں پہلے سے معلوم
افراد کے خلاف ایسی موٹر سائیکل کی سرقتی کی دعویداری کی تھی اور بعد ازاں مجھے موٹر سائیکل ملی جانے پر
موٹر سائیکل تقاضا لاکر پولیس نے مجھے موٹر سائیکل باضابطہ طور پر ملنے کیلئے ملازمان یوٹر خان اور فیاض
کے خلاف دعویداری لاکھا گیا۔ میں نے شک اور پولیس کے ملاح و مشورے سے ملازمان کے خلاف دعویداری
کی مگر اب ملازمان فیاض اور یوٹر خان نے مجھے اپنی بیگناہی کی تسلی کی ہے۔ میں ملازمان کے خلاف
مقدمہ چلانا نہیں چاہتا اگر عدالت حضور ملازمان کو بری فرمائے تو مجھے کوئی اعتراض نہیں۔

گواہ
شاہد خان ولد شیر حسن
سکنہ بیچ پیر، ضلع ہوابی

16203-0358873-7
المعد
عارف سعید ولد شادوس خان

گواہ
حافظ بہایت خان ولد
شادوس سکنہ آئندہ
گدون، ضلع ہوابی

Shahid
Khan

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Examiner Copying Branch
District & Sessions Judge, Swabi

برائے بیان صلیبی نمائند عارف سعید ولد شاہ رضا خان کینہ آئی ڈی ڈیون، ضلع ہیراپہ

10-11-2018

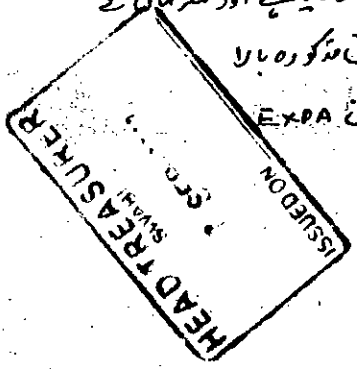
16203-0358873-7

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بیان عارف سعید ولد شاہ رضا خان کینہ آئی ڈی ڈیون برصغیر

10-11-2018

بیان کیا کہ میں نے بروئے FIR نمبر 53 مورخہ 03-12-2018 کو ایسی موٹر سائیکل کی سرچیدگی کا بر خلاف ملزمان نامعلوم و دعویہ اری کی تھی اور بعد ازاں مقامی پولیس کے مہلک و مشورے سے ملزم روپز خان ولد زلفی خان کینہ ساکنہ 09 اور ملزم محمد ضامن ولد محمد روز خان کینہ آئی ڈی ڈیون دعویہ اری کی تھی۔ ملزمان مذکورہ نے مجھے ایسا بیگناہی کی تسلی کی ہے۔ میں نے ملزمان کو فی سبیل اللہ معاف کر دیا ہے اور ملزمان کے خلاف مقدمہ چلانا نہیں چاہتا اگر عدالت حضور ملزمان مذکورہ بالا کو بری فرمائے تو مجھے کوئی اعتراض نہیں ہوگا۔ بیان صلیبی EXPA ہے جبکہ نقل قومی کارڈ EXPB ہے۔



عارف سعید ولد شاہ رضا خان
سلیقیت

16203-0358873-7

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من کردہ نسخہ کیا

No of application 11765 CJ/JM Swabi
Date of presentation of application 10-11-2018
Date on which copy prepared 18-11-18
Date on which copy delivered 18-11-18
Total Number of pages U/E 03
Signature of Copyist [Signature]

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EXAMINER
District & Sessions Judge, Swabi
Authorized Under Article 87 of
The Qanun-e-Shahadat Order 1984

FINE - ACCUITA OR NOI

16203-0405703-7

HEAD TREASURY
SWABI
7 SEP 2018
ISSUED ON

برائے بیان حلقہ سخیانہ فضل محمد ولد پیر زمان خان کئے سوکھیلیں، گدوں، تحصیل ٹوپی، ضلع صوابی یوق ملزمان روپنر خان، محمد فیاض

ASAMAT ALAM

بیان فضل محمد ولد پیر زمان خان کئے سوکھیلیں گدوں،
13.11.2018
تحصیل ٹوپی، ضلع صوابی برصفت :-

بروتے FIR 54 عرقہ 3¹²/₁₇ تھانہ آندہ ہیں۔
بیان کیا کہ میں نے اپنی موٹر سائیکل کی سرقتیگی کا برخلاف ملزم / ملزمان سے معلوم
دعویداری کی تھی اور بعد ازاں شک کی بناء پر ملزمان روپنر خان اور محمد فیاض کے خلاف
دعویداری کی تھی مگر اب ملزمان نے مجھ اپنی بے گناہی کی برخلاف تسلی کی ہے یہ میں وجہ
میں ملزمان کے خلاف مقدمہ چلانا نہیں چاہتا۔ اگر عدالت ملزمان کو بری
فرمائے تو میرے کوئی اعتراض نہیں ہوگا۔ بیان حلقہ بابت بے گناہی ملزمان EXPA
ہے جبکہ نقل قومی شناختی کارڈ EX PB ہے۔

من کردوست تسلیم کیا

فضل محمد ولد پیر زمان خان
مستغنیث

16203-0405703-7

Judicial Magistrate
Swabi

13-11-18

No of application 11764
Date of presentation of application 13.11.18
Date on which copy prepared 13.11.18
Date on which copy delivered 13.11.18
Total Number of pages U/E 05
Signature of Copyist

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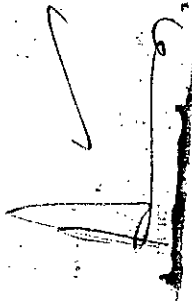
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District & Sessions Judge, Swabi
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The Qanun-e-Shahadat Order 1984

Examiner Copying Branch
District & Sessions Judge Swabi

اپنی حقیقت کو ثابت کرنے کے لیے درخواست (Applicant) کی طرف سے

19-11-18

16202-3704506-5



LEAD (RELEASED)
19 SEP 2018
ISSUED BY

بیان سامراجی و لاء ڈیپارٹمنٹ کے
19.11.2018

بیان کیا کہ میں نے بروئے کار PIR نمبر SS-17-08-17 کو
تعمیرات میں زبردستی 28.11.18 تک دعوہ جاری کی تھی مگر اب
ملزمان نے میری دستی کیس پر اور ملزمان نے اسے جے ٹی
سماج کو ثابت کر لیا ہے اس لیے اسے جوڑنا مناسب نہیں ہے
میں اب ملزمان کے خلاف مقدمہ چلانا نہیں چاہتا اور عدالت
محترمہ ملزمان کو بری قرار دے کر اسے اٹھائے گا۔ بیان حافی
بابت جے ٹی ملزمان EXPA ہے جس کے تحت 17.11.18 کی

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EXAMINER
Copying Department
Session Court Swabi

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Judicial Magistrate
Swabi

19-11-18

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No of application 12086
Date of presentation of application 27.11.18
Date on which the copy prepared 28.11.18
Date on which the copy issued 28.11.18
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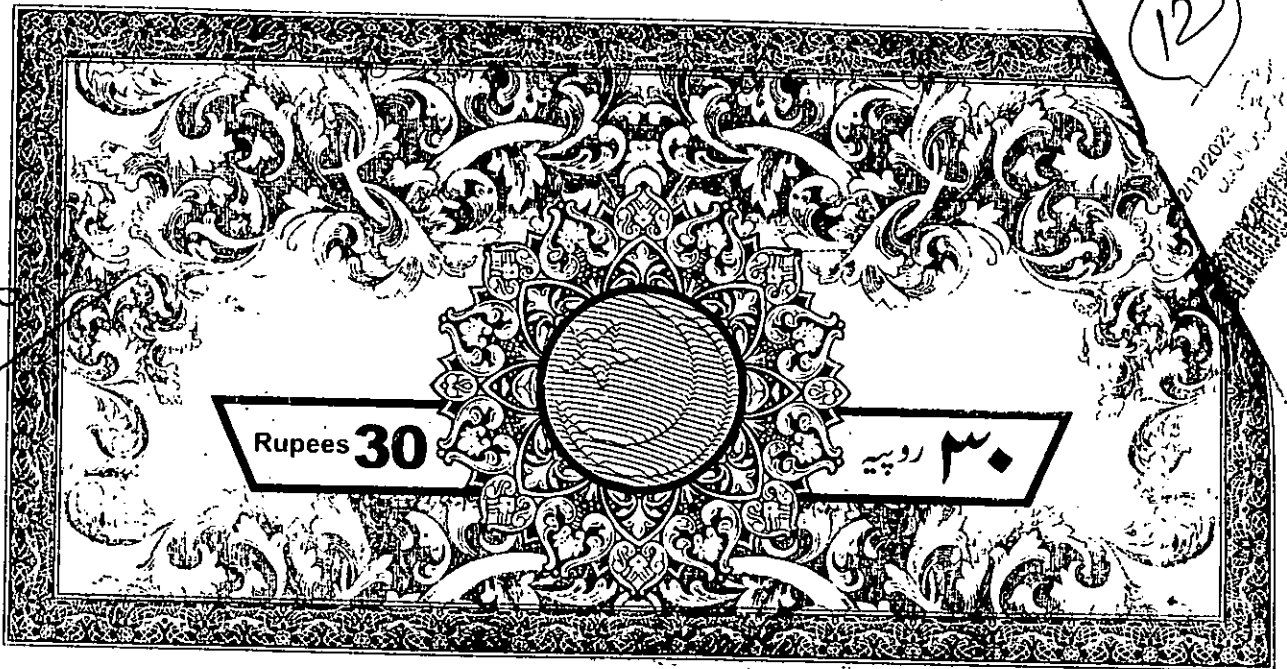
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28.11.18
Examined by [Signature] Deptt:
Session Court Swabi

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نہایت سزا

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لیدر صاحب جوڈیشل ٹریبیونل صاحب موہی

EX PA

SM-1 Swam

18.10.18

محمد میاں ولد محمد نور خان
تسہ اتلا تمہیں نوکری
کی حکام - (دیپانڈس)

مہل خان دہلوی صاحب
اتلا تمہیں نوکری منع موہی
(مستعفی)

تعداد 56 عوردم $\frac{12}{18}$ 18 جرم 381A PP.C تعاقب اتلا



بیان طلبی
مذکورہ سہیل خان ولد مہل دھن سنگھ اتلا تمہیں نوکری منع موہی
کیا گیا ہے۔ میں یہ بیانات تمہیں بلدیہ میں ملنا بیان کیا گیا ہے۔
میں نے ملزم باہر خدمت معافی پوسٹ کے لئے یہ دوپہاری
کی تمہارے قلم جو کہ سائل مذکورہ مبارک سے چھپا کر
کے فاصلہ پر تمہیں لکھا ہے۔ جو تمہیں سے پوسٹ معافی کی اطلاع
دی۔ اور ملزم سے کوئی برآمدگی میں ہوئی تھی۔ جبکہ
ملزم باہر سے کوئی سائل نہیں لائے۔ اور تمہارے نام سے کوئی لٹاہ میں
آئی ہوگی۔ صورت یہ ہے کہ معافی ملزم باہر کو برآمدگی
کو معافی ہوئی ہے۔ اس لئے میں نے یہ بیان تمہیں لکھا ہے۔
اس میں کوئی اور غلطی یا ترمیم نہ کی گئی ہے۔
بیان ملزم کے لئے دی گیا ہے۔

1620-5369202-3

مہل خان (مستعفی)

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Printer Copying Branch
Sessions Judge Swam

بیان گل خان ولد گل رحمان کتہ جبہ گدون، ضلع مہراپی برحلف۔

18.10.18

19-10-18
1199
جل خان برحق امان کی انکریسا نسخہ

Judicial Complex Swabi

بیان کیا کہ میں نے بروئے FIR نمبر 56 مورثہ 17.12.11 کو اپنی موٹر سائیکل کی سرقتیوں کا برخلاف ملزم فیاض وقوعہ کے 5/6 دن بعد پولیس کے مشورہ پر دعویداری کی تھی لیکن دو سرے ہی دن مجھے گاؤں نوگرام سے اطلاع ملی کہ میرا موٹر سائیکل جسہ شمیرا مان کے قریب کھڑا ہے جسکی اطلاع میں نے پولیس کو دی اور پولیس نے وہاں سے موٹر سائیکل قبضہ میں لیکر ملزم سے برآمد کرنا بیان کیا ہے۔ میں نے ملزم کو موٹر سائیکل چوری کرتے نہ دیکھا ہے اور نہ ہی موٹر سائیکل ملزم سے برآمد ہے۔ ملزم نے اس کے تباہی کا تسلی مجھے حلف پر دی ہے۔ میں ملزم کے خلاف مقدمہ چلانا نہیں چاہتا ہوں اور اگر عدالت حضور ملزم کو باعزت بری فرمائے تو مجھے اعتراض نہیں ہے۔ بیان حلفی بابت تسلی و بے گناہ ملزم EXDA ہے جسکے نقل قوی کارڈ EXPB ہے۔

گل خان ولد گل رحمان کتہ جبہ

16203-0369202-5

Roan AC



18/10/18

No of application 11766 جوان JM
Date of presentation of application 18.11.18
Date on which copy prepared 18.11.18
Date on which copy delivered 18.11.18
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District & Sessions Judge Swabi

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EXAMINER
District & Sessions Judge, Swabi
Authorized Jnc. Article 87 of
The Qanun-e-Shahadat Order 1984

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IN THE COURT OF MUHAMMAD IRFAN,

JUDICIAL MAGISTRATE, SWABI

The state vs Muhammad Fayaz

C-13

FIR # 56 dated 11.12.2017 u/s 381-A/411 PPC

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537/2

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17 3/18

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18



Present: The accused on alongwith counsel, complainant in person and SPP for the state.

Complainant tendered an affidavit of compromise, EXPA, whereby, he has effected a compromise with the accused facing trial and pardoned him. His statement after obtaining copy of his CNIC as EXPB to that effect is recorded, wherein, he while reiterating the compromise to be forthright and genuine has extended his no objection on the acquittal of the accused. Offence u/s 381-A/411 PPC is non compoundable in nature, but, if the parties had themselves voluntarily forgotten and forgiven the crime and had entered into an outside the court settlement, the same could be considered as ground for the acquittal of accused in the interest of justice and equity. Furthermore, when the complainant party also does not want to prosecute the matter any further, court could not compel it to do so. Therefore, by accepting the compromise the accused facing trial is acquitted on the basis of compromise from the charges leveled against him. Since, he is on bail. His bail bonds stand cancelled and sureties are discharged from liabilities of their bail bonds. Case property, if any, be dealt in accordance with law. Consigned.

Announced:
18.10.2018

Muhammad Irfan
Judicial Magistrate, Swabi

Attested to be true copy

Examiner Copying Branch
District & Sessions Judge Swabi

32
IN THE COURT OF MUHAMMAD IRFAN,

JUDICIAL MAGISTRATE, SWABI

The state vs Muhammad Fayaz

FIR # 04 dated 06.01.2018 u/s 381-A/411 PPC

Order # 08

18 October 2018

Present: The accused on alongwith counsel,
complainant in person and SPP for the state. PWs absent.

Complainant tendered an affidavit of compromise, EXPA, whereby, he has effected a compromise with the accused facing trial and pardoned him. His joint statement after obtaining copy of his CNIC as EXPB to that effect is recorded, wherein, he while reiterating the compromise to be forthright and genuine has extended his no objection on the acquittal of the accused. Offence u/s 381-A/411 PPC is non compoundable in nature, but, if the parties had themselves voluntarily forgotten and forgiven the crime and had entered into an outside the court settlement, the same could be considered as ground for the acquittal of accused in the interest of justice and equity. Furthermore, when the complainant party also does not want to prosecute the matter any further, court could not compel it to do so. Therefore, by accepting the compromise the accused facing trial is acquitted on the basis of compromise from the charges leveled against him. Since, he is on bail. His bail bonds stand cancelled and sureties are discharged from liabilities of their bail bonds. Case property, if any, be dealt in

accordance with law. Consigned.

Announced:

18.10.2018

Muhammad Irfan
Judicial Magistrate, Swabi

ATTESTED

Examined by
Sessions Court Swabi

20.10.18

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17 3/18

16 1/18

7062
18

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15

ملفوظ قلم، قلم رانہ نامہ بیان، نامہ خارج عدلیہ لڈاکی جی ایم ایف

سنگار نامہ ضابطی



Order # 10
10 November 2018

Present: Both the accused on bail alongwith counsel, complainant in person and SPP for the state.

Complainant tendered an affidavit of compromise, EXPA, whereby, he has effected a compromise with the accused facing trial and pardoned them. His statement recorded overleaf of compromise deed. Copy of his CNIC is EXPB. He while reiterating the compromise to be forthright and genuine has extended his no objection on the acquittal of the accused. Offence u/s 381-A/411 PPC is non compoundable in nature, but, if the parties had themselves voluntarily forgotten and forgiven the crime and had entered into an outside the court settlement, the same could be considered as ground for the acquittal of accused in the interest of justice and equity. Furthermore, when the complainant party also does not want to prosecute the matter any further, court could not compel it to do so. Therefore, by accepting the compromise the accused facing trial are acquitted on the basis of compromise from the charges leveled against them. Since, they are on bail. Their bail bonds stand cancelled and sureties are discharged from liabilities of their bail bonds. Case property, if any, be dealt in accordance with law. Consigned.

573/2

عدلیہ

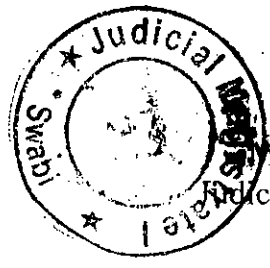
17/3/18

عدلیہ

10/11/18

7555/2018

Announced:
10.11.2018



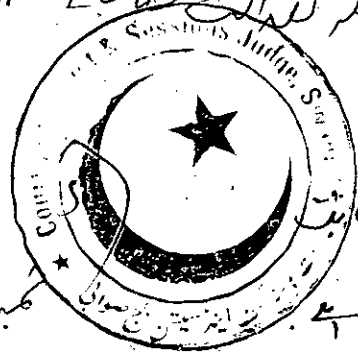
Muhammad Irfan
Judicial Magistrate, Swabi

Attested to be true copy

10/11/18
Examiner Copying Branch
District & Sessions Judge Swabi

16

صفحه نقل، فعل، فارم خارج، راجع ناصح بیان، فعل، للمالک ضابطہ - JM-1



عنوان: سرکار ضابطہ

SPP ما فزو۔ ملزمان نیماہن، رویت ما فزوہ ما فزوہ

10-11-18

بیانی ہیں کہ راجع نامہ ما بین نزدیکین ہو گیا ہے

574/2 مستقیم ما فزوہ ہے۔ نوٹس مستقیم مورفہ 10/11/18

17/3 ایسے جاری ہو۔ گواہ شعیب ای و سید بیار، ما فزوہ

18/3

13/11/18

Muhammad Irfan
Judicial Magistrate, Swabi

Order # 01
13 November 2018

Case was fixed for 10.01.2019, but, counsel for the accused submitted an early hearing application for the purpose mentioned therein, which is accepted and case file requisitioned and fixed for today.

Present: Accused Fayaz, Revez are on bail alongwith counsel, complainant namely Fazal Muhammad in person and SPP for the state. PWs absent.

Complainant tendered an affidavit of compromise, EXPA, whereby, he has effected a compromise with the accused facing trial and pardoned them in the name of ALLAH, the Almighty. His statement to that effect is recorded after obtaining copy of his CNIC as EXPB, wherein, he while reiterating the compromise to be forthright and genuine has extended his no objection on

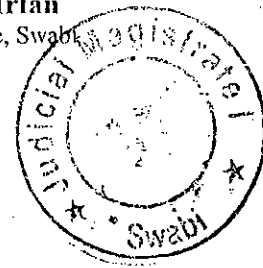
Attested to be true copy
Examiner Copying Branch
District & Sessions Judge Swabi

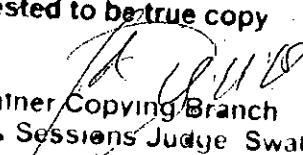
13/11/18

the acquittal of the accused facing trial. Offence u/s 381-A PPC is non compoundable in nature, but, if the parties had themselves voluntarily forgotten and forgiven the crime and had entered into an outside the court settlement, the same could be considered as ground for the acquittal of accused in the interest of justice and equity. Furthermore, when the complainant party also does not want to prosecute the matter any further, court could not compel it to do so. Therefore, by accepting the compromise the accused facing trial are acquitted on the basis of compromise from the charges leveled against them. Since, they are on bail, their bail bonds stand cancelled and sureties are absolved. Case property, if any, be dealt in accordance with law. Consigned.

Announced:
13.11.2018.

Muhammad Irfan
Judicial Magistrate, Swabi



Attested to be true copy

Examiner Copying Branch
District & Sessions Judge Swabi

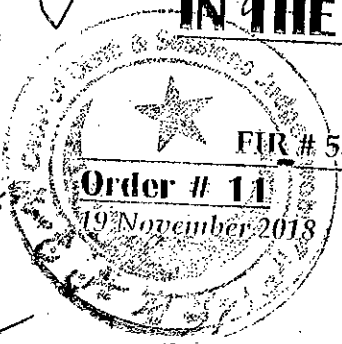
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2018

IN THE COURT OF MUHAMMAD IRFAN,

JUDICIAL MAGISTRATE, SWABI

The state vs Ravez Khan etc

FIR # 55 dated 03.12.2017 u/s 381-A/411 PPC PS Ulla

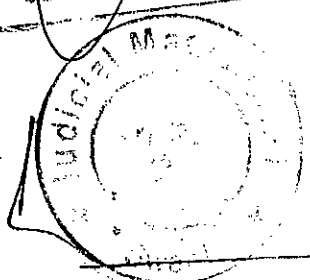


From perusal of the record, it found that the case was fixed for 10.01.2019, but, counsel for the accused submitted an early hearing application for the purpose mentioned therein, which is accepted, case file requisitioned and fixed for today.

Present: Both the accused on bail alongwith counsel, complainant in person and SPP for the state.

Complainant tendered an affidavit of compromise, EXPA, whereby, he has effected a compromise with the accused facing trial and pardoned them. His statement recorded overleaf of compromise deed. Copy of his CNIC is EXPB. He while reiterating the compromise to be forthright and genuine has extended his no objection on the acquittal of the accused. Offence u/s 381-A/411 PPC is non compoundable in nature, but, if the parties had themselves voluntarily forgotten and forgiven the crime and had entered into an outside the court settlement, the same could be considered as ground for the acquittal of accused in the interest of justice and equity. Furthermore, when the complainant also does not want to prosecute the matter any further, court could not compel it to do so.

ATTESTED
28/11/18
Sessions Court Swabi



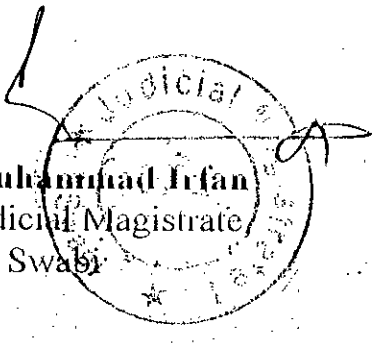
19/11/18

Swabi do hereby char
Rayez Khan s/o
C with PS.

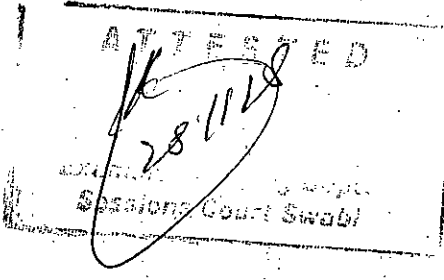
Therefore, by accepting the compromise the accused facing trial are acquitted on the basis of compromise from the charges leveled against them. Since, they are on bail. Their bail bonds stand cancelled and sureties are discharged from liabilities of their bail bonds. Case property, if any, be dealt in accordance with law. Consigned.

Announced:
19.11.2018

Muhammad Irfan
Judicial Magistrate
Swabi



ATTESTED
28/11/18
Sessions Court Swabi



36

D-18

511



OFFICE OF THE DISTRICT POLICE OFFICER, SWABI

ORDER

Constable Fayyaz Belt No. 511, while posted to Police Lines Swabi absented himself from duty with effect from 05.11.2017 till date without any leave or prior permission of the competent authority and meanwhile, he has also involved himself in case vide FIR No. 53 Dated 03.12.2017 U/s 381-A PPC PS Utlā, FIR No. 54 Dated 03.12.2017 U/s 381-A/411 PC PS Utlā, FIR No. 55 Date 08.12.2017 U/s 381-A/411 PPC PS Utlā and FIR No. 56 Dated 08.12.2017 U/s 381-A/411 PPC PS Utlā, which is highly against the discipline and amounts to gross misconduct.

In this connection, he was issued a Show Cause Notice vide this office Endst: No. 279/PSO, Dated 04.12.2017. He was directed time and again to receive his Show Cause Notice but he did not bother to receive, as such he was served with Charge Sheet and Summary of allegations vide this office Endst: No. 42/PSO. Dated 11.12.2017 and SDPO Razzar was appointed as Enquiry Officer. The officer conducted proper departmental enquiry, collected evidence and recorded statements of all concerned. The Enquiry Officer submitted his findings wherein he found Constable Fayyaz Belt No. 511 guilty for the misconduct and recommended him for major punishment. The undersigned perused the enquiry papers, findings and by agreeing with the Enquiry Officer issued him Final Show Cause Notice vide this office Endst: No. 01/PSO, Dated 01.01.2018 and as per rules, he was bound to receive his Final Show Cause but neither he attended the office nor joined back his duty which means that he has nothing to offer in his defense and hence, deserves the ex-parte action on the aforementioned grounds.

Certified to be true Copy.

Therefore, I, **Sohail Khalid, PSP**, District Police Officer, Swabi, in exercise of the powers vested in me under Rules 5(3) of the Khyber Pakhtunkhwa Police Rules 1975, hereby award Constable Fayyaz Belt No. 511 Major punishment of **Dismissal** from service from the date of his absence i.e. 05.11.2017.

Order announced:
On 11.01.2018

O.B No. 48
Dated 15 / 1 / 2018

District Police Officer,
S W A B I

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI.

No. 52-56 PSO, dated Swabi, the 15 / 01 / 2018.

Copies to the:-

1. DSP, II QRs, Swabi.
2. Pay Officer.
3. Establishment Clerk.
4. Fauji Missal Clerk.
5. Official Concerned.

ATTESTED

District Police Officer, Swabi.

ATTESTED

3
16/1/18

ARRESTED

کتابخانه ملی افغانستان

ساز

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12

دولت افغانستان
وزارت فرهنگ و ارشاد اسلامی
کتابخانه ملی افغانستان
کتاب: ...
نویسنده: ...
تاریخ: ...

کتابخانه ملی افغانستان
کتاب: ...
نویسنده: ...
تاریخ: ...

ساز

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کتابخانه ملی افغانستان



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.

No. S/ 09 /18, dated Peshawar the 01/10/2018.

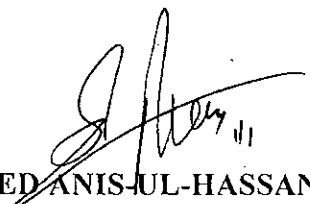
To : The Regional Police Officer,
Mardan Region, Mardan.

Subject: REVISION PETITION.

Memo :

The competent Authority has examined and filed the appeal submitted by Ex-Constable Fayaz No.511 of Swabi District Police against the punishment of dismissal from service awarded by District Police Officer, Swabi vide order No.52-56/PSO, dated 15.01.2018 being badly time barred.

The applicant may please be informed accordingly.


(SYED ANIS-UL-HASSAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

ATTESTED


21/10

VAKALATNAMA

SCANNED
KPSI
Peshawar
Peshawar

Before the Khyber Pakhtunkhwa Service Tribunal

No. _____/2019

Muhammad Fayaz

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Police Department

(RESPONDENT)
(DEFENDANT)

I/We *Muhammad Fayaz*

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** 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 cost. 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.

Dated. _____/_____/2019

[Signature]

CLIENT

[Signature]

ACCEPTED

NOOR MOHAMMAD KHATTAK

SHAHZULLAH KHAN YOUSAFZAI

[Signature]

**MIR ZAMAN SAFI
ADVOCATES**

OFFICE:
Room No.1, Upper Floor,
Islamia Club Building, Khyber Bazar,
Peshawar City.
Phone: 091-2211391.

40
①
THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR.

Service Appeal No. 150/2019.

Muhammad Fayaz Ex-Constable No. 511.....

SCANNED
KPST
Peshawar
Appellant

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
& 02 Others..... Respondents.

WRITTEN REPLY ON BEHALF OF RESPONDENTS.

1. **Preliminary Objections.**

1. That the appellant has got no Cause of action and locus standi to file the present appeal.
2. That the appeal is bad due to misjoinder and nonjoinder of necessary parties.
3. That the appeal is time barred.
4. That the appellant has not come to the Tribunal with clean hands.
5. That this Hon'ble Tribunal has got no jurisdiction to entertain the present appeal.
6. That the instant appeal is not maintainable in its present form.
7. That the appellant concealed the material facts from this Hon'ble Tribunal.
8. That the appellant has been estopped by his own conduct to file the appeal.

2. **REPLY ON FACTS.**

1. Para No. 01 of appeal to the extent of appointment of appellant as Constable is correct, however appellant at initial stage of his service proved himself an inefficient Police official. Appellant while undergoing recruit course had stolen an amount of Rs. 4995/- from various recruits and upon search stolen amount Rs. 4800/- and one stolen camera was recovered and proper FIR against him was registered, resultantly discharge from service (**Copy of discharge is annexed as Annexure A & B**).
2. Para No. 02 of appeal to the extent of falsely involvement in FIRs is incorrect. Appellant during service involved himself in the offences of moral turpitude and arrested in such cases.
3. Para No. 03 of appeal to the extent of acquittal of appellant is correct, however appellant patch up the matter and enter into the compromise with complainant

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②

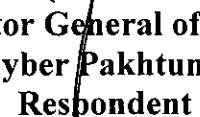
party on the basis of such compromise trial Court acquit him on technical ground whereas compromise amounts to admission of guilt.

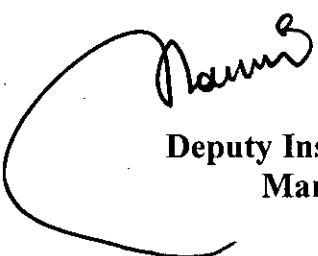
4. Para No. 04 of appeal to the extent of dismissal is correct, however such order was passed after proper departmental enquiry. Appellant filed departmental appeal which was rejected by the respondent No. 2 vide order dated 13.03.2018. Appellant also filed review petition before respondent No. 1, which was rejected being time barred.
5. Appellant has got no cause of action to file the instant appeal which is badly time barred and groundless.

GROUNDS.

- A. Incorrect. The orders of respondents dated 15.01.2018, 13.03.2018 and 01.01.2019 are quite legal in accordance with law/rules.
- B. Incorrect. Appellant was treated in accordance with law/rules.
- C. Incorrect. After proper departmental enquiry appellant was found guilty and dismissed from service through speaking order.
- D. Incorrect. Reply already given vide para above.
- E. Incorrect. Proper opportunity of defence was provided to appellant, but he failed to prove himself innocent.
- F. Incorrect. Reply already give vide paras above.
- G. Incorrect. Appellant being member of force, suppose to protect life and property of public, but he himself snatched the property of public and brings bad name to the institution.
- H. That respondents also seek permission of this Hon'ble Tribunal to advance further grounds/proofs at the time of argument.

It is therefore humbly prayed that the instant appeal may very kindly be dismissed.


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
Respondent No. 1)


Deputy Inspector General of Police,
Mardan Region-I Mardan
(Respondent No. 2)


District Police Officer Swabi,
(Respondent No. 3)

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42

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

Service Appeal No. 150/2019.


Muhammad Fayaz Ex-Constable No. 511..... Appellant

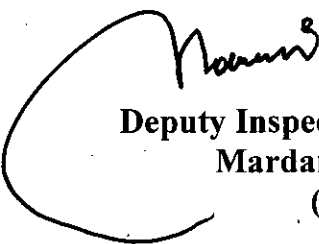
VERSUS

**1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
& 02 Others..... Respondents.**

AFFIDAVIT:-

We the respondent No. 1 to 3 do hereby solemnly affirm and declare on oath that the contents of the written reply are correct/true to the best of our knowledge / belief and nothing has been concealed from the honorable Tribunal.


**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
Respondent No. 1)**


**Deputy Inspector General of Police,
Mardan Region-I Mardan
(Respondent No. 2)**


**District Police Officer Swabi,
(Respondent No. 3)**

A^r (4) 93
Better Copy

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI

ORDER.

Recruit Constable Muhammad Fayaz No. 1245 while undergoing recruit course at PTC Hangu involved himself in case FIR No. 726 dated 18.09.2012 u/s 380/411 PPC Police station City District Hangu, which is highly against the discipline and amounts to gross mis-conduct.

Therefore, I, Abdur Rashid, District Police Officer, Swabi, in exercise of the powers vested in me under Police Rules 1975, hereby award Recruit Constable Muhammad Fayaz No. 1245, Major Punishment of discharge from service under Police Rules 12-21 with immediate effect.

OB No. 1116

Dated 17.10. /2012.

-sd-

(Abdur Rashid)

District Police Officer, Swabi.

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI.

No. 1690-94 /PA, dated Swabi, the 17/10 /2012.

Copies to the:-

1. Deputy Inspector General of Police, Mardan Region-I, Mardan for favour of information w/r to his Dairy No. 3303 dated 05.10.2012
2. Pay Officer.
3. Establishment Clerk.
4. Fauji Missal Clerk.
5. Official concerned.

AHedid
Fatima
hp. Legat
Swabi

(5)

Annexure - A

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(1245)

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI.

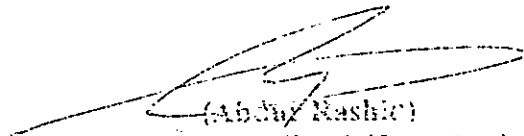
ORDER.

Recruit Constable Muhammad Fayaz No.1245, while undergoing recruit course at PTC Hangu involved himself in case FIR No.726 dated 18.09.2012 u/s 363/411 PFC-Police Station City District Hangu, which is highly against the discipline and amounts to gross mis-conduct.

Therefore, I, Abdur Rashid, District Police Officer, Swabi, in exercise of the powers vested in me under Police Rules 1975, hereby award Recruit Constable Muhammad Fayaz N. 1245, Major Punishment of discharge from service under Police Rules 12-21 with immediate effect.

C.S. No. 1116

Dated 17-10/2012.


(Abdur Rashid)
District Police Officer, Swabi.

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI.

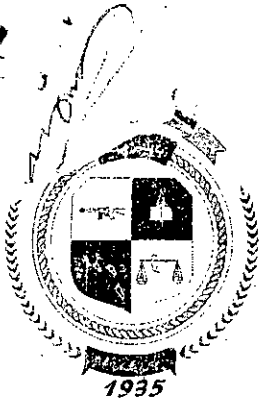
No. 1116/P.A. dated Swabi, the 17/10/2012.

Copies to the -

1. Deputy Inspector General of Police, Mardan Region-I, Mardan for receipt of information with his Office Entry No. 1316 dated 06.10.2012.
2. Pay Officer.
3. Establishment Clerk.
4. Head Missal Clerk.
5. Official concerned.

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[Handwritten notes]



'B'

A/E

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Ph # 0925-621886

Fax # 0925-623236

OFFICE OF THE COMMANDANT POLICE TRAINING COLLEGE HANGU



To: The District Police Officer, Swabi.

No. 2538 EC, Dated Hangu the 18.10/2012.

Subject:- CASE FIRE NO. 726 DATED 18.09.2012 U/S 380/411PPC PS HANGU

Memo:

Junior Recruit Muhammad Fayyaz No. 1245 of your District had stolen an amount of Rs. 4995/- from various recruits. On search, a sum of Rs. 4800/- with a Camera was recovered from him. To this effect, proper case had been registered against him. He was sent to the Jail. His bail application has now been admitted on 26.09.2012.

He is unable to be retained in the PTC, therefore he is returned to the District as unqualified vide OB No. 841 dated 15.10.2012. He is recommended to be discharged from service under Police Rule No. 12-21. Enquiry papers with photocopy of FIR are also enclosed herewith please.

[Signature]
Commandant,
Police Training College, Hangu.

No. EC, Dated Hangu the /2012.

Copy to Addl. Inspector General of Police Operations & Training,

Khyber Pakhtunkhwa, Peshawar for information please.

Commandant,
Police Training College, Hangu.

*OTAs
for Swabi*

249
کاپی کے ساتھ
فائرنگ کی رپورٹ کی فائل کی کاپی میں
فائل نمبر 116/17/12
OB No 116/17/12
12-21
266

46

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 2908¹⁰ /ST

Dated 09/10/2020

SCANNED
KPST
Peshawar


To

1. The Inspector General of Police,
Government of Khyber Pakhtunkhwa,
Peshawar.
2. Regional Police Officer,
Government of Khyber Pakhtunkhwa,
Mardan.
3. District Police Officer,
Government of Khyber Pakhtunkhwa,
Swabi.

SUBJECT: - ORDER IN APPEAL NO. 150/2019 MR. MUHAMMAD FAYAZ.

I am directed to forward herewith a certified copy of order dated 01.09.2020 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

FINAL SHOW CAUSE NOTICE

Whereas, you Constable Fayyaz Belt No. 511, while posted to Police Lines Swabi absented yourself from duty with effect from 05.11.2017 till date without any leave/prior permission of the competent authority and thereby involved yourself in cases vide FIR No. 53 Dated 03.12.2017 U/s 381-A PS Utla, FIR No. 54 Dated 03.12.2017 U/s 381-A/411 PPC PS Utla, FIR No. 55 Dated 08.12.2017 U/s 381-A/411 PPC PS Utla and FIR No. 56 Dated 11.12.2017 U/s 381-A/411 PPC PS Utla, which is highly against the discipline and amounts to gross misconduct.

In this connection, you were charge sheeted and served with summary of allegation and DSP, Razzar was appointed to conduct proper departmental enquiry. The enquiry officer held enquiry and submitted his findings wherein, he held you Constable Fayyaz 511 guilty for the misconduct and thereby initiated ex-parte action against you with recommendation for major punishment.

Therefore, it is proposed to impose Major/Minor penalty including dismissal as envisaged under Rules 4(b) of the Khyber Pakhtunkhwa Police

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OFFICE OF THE DISTRICT POLICE OFFICER, SWABI

ORDER

SCANNED
KPS,
Peshawar


Constable Fayyaz Belt No. 511, while posted to Police Lines Swabi absented himself from duty with effect from 05.11.2017 till date without any leave or prior permission of the competent authority and meanwhile, he has also involved himself in case vide FIR No. 53 Dated 03.12.2017 U/s 381-A PPC PS Utla, FIR No. 54 Dated 03.12.2017 U/s 381-A/411 PC PS Utla, FIR No. 55 Date 08.12.2017 U/s 381-A/411 PPC PS Utla and FIR No. 56 Dated 08.12.2017 U/s 381-A/411 PPC PS Utla, which is highly against the discipline and amounts to gross misconduct.

In this connection, he was issued a Show Cause Notice vide this office Endst: No. 279/PSO, Dated 04.12.2017. He was directed time and again to receive his Show Cause Notice but he did not bother to receive. As such he was served with Charge Sheet and Summary of allegations vide this office Endst: No. 42/PSO, Dated 11.12.2017 and SDPO Razzar was appointed as Enquiry Officer. The officer conducted proper departmental enquiry, collected evidence and recorded statements of all concerned. The Enquiry Officer submitted his findings wherein he found Constable Fayyaz Belt No. 511 guilty for the misconduct and recommended him for major punishment. The undersigned perused the enquiry papers, findings and by agreeing with the Enquiry Officer issued him Final Show Cause Notice vide this office Endst: No. 01/PSO, Dated 01.01.2018 and as per rules, he was bound to receive his Final Show Cause but neither he attended the office nor joined back his duty, which means that he has nothing to offer in his defense and hence, deserves the ex-parte action on the aforementioned grounds.

Therefore, I, **Sohail Khalid, PSP**, District Police Officer, Swabi, in exercise of the powers vested in me under Rules 5(3) of the Khyber Pakhtunkhwa Police Rules 1975, hereby award Constable Fayyaz Belt No. 511 Major punishment of **Dismissal** from service from the date of his absence i.e. 05.11.2017.

Order announced:
On 11.01.2018.

O.B No. 48
Dated 15 / 1 / 2018.

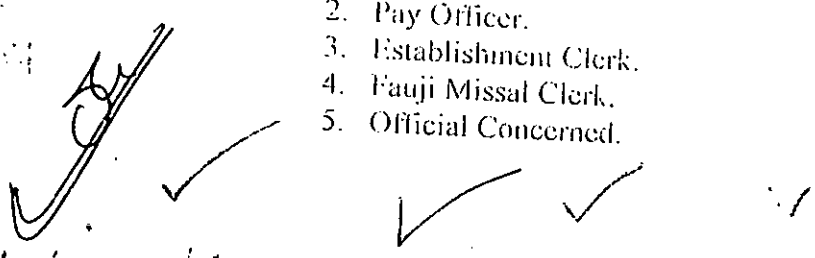

District Police Officer,
SWABI.

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI

No. 52-56/PSO, dated Swabi, the 15 / 01 / 2018.

Copies to the: -

- 1. DSP, H.Q.Rs, Swabi.
- 2. Pay Officer.
- 3. Establishment Clerk.
- 4. Fauji Missal Clerk.
- 5. Official Concerned.



49



Government of Khyber Pakhtunkhwa.
Office of the Superintendent of Police,
Investigation, Swabi.

Phone No. 0938-280266, Fax No. 0938-280268.

To: - The District Police Officer,
Swabi.

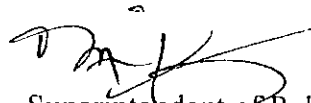
No. 10450 /GB dated Swabi, the 14 / 12 2017.

- Subject:
- (1) CASE FIR NO. 53 DATED 03.12.2017 U/S 381-A/411 PPC PS UTLA DISTRICT SWABI.
 - (2) CASE FIR NO. 54 DATED 03.12.2017 U/S 381-A PPC PS UTLA DISTRICT SWABI.
 - (3) CASE FIR NO. 55 DATED 08.12.2017 U/S 381-A/411 PPC PS UTLA DISTRICT SWABI.
 - (4) CASE FIR NO. 56 DATED 11.12.2017 U/S 381-A/411 PPC PS UTLA DISTRICT SWABI.

Memo:

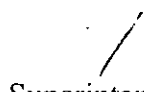
Accused Muhammad Fayaz S/o Jamrooz Khan r/o Lohar Serai Utlra District Swabi has been charged in the subject cases. Reportedly, the aforesaid accused is serving as Constable No. 511 under your kind control and is posted at Police Lines Swabi.

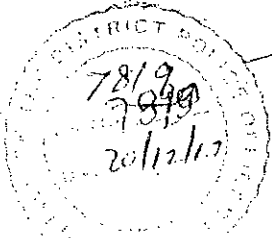
It is, therefore, requested that the aforesaid accused may please be proceeded against departmentally under intimation to this office.


Superintendent of Police,
Investigation, Swabi.

No. 10451 /GB,

Copy to OII PS Utlra for information w/r dated 12.12.2017.


Superintendent of Police,
Investigation, Swabi.

Pso
For ma.

7819
7819
20/12/17

50

From: The Sub Divisional Police Officer,
Circle Razzar, Kernal Sher Kelli.

To: The District Police Officer,
Swabi.

No. 747 /S, dated Razzar the 29/12/2017.

Subject: DEPARTMENTAL ENQUIRY AGAINST CONSTABLE FAYAZ NO. 511.

Memo:

In compliance with your office letter No.42/CC/PSO dated: 11.12.2017 on subject noted above.

SUMMARY OF ALLEGATIONS:-

It is alleged that Constable Fayaz No. 511, while posted at Police line Swabi absented himself from duty with effect from 05.11.2017 till date without any leave/prior permission of the competent authority. In this regard, the delinquent was issued a show cause notice vide DPO office No. 279/PSO, dated: 04.12.2017 but he neither received the show case notice nor join back his duty and meanwhile, he has also involved himself in case vide FIR No.55 dated: 03.12.2017 U/s 381A, and FIR No. 56 dated: 05.12.2017 U/s 381A PS Utlā, which speaks of his inefficiency and amounts to gross misconduct. Hence summary of allegations.

PROCEEDINGS:-

Constable Fayaz No. 511/FC posted at Police line Swabi was called for so many times to appear before the following dates to record his statement in connection with his departmental enquiry.

S#	Memo No.	Date of issue	Date of appearance
1.	673	12.12.2017	15.12.2017
2.	680	15.12.2017	18.12.2017
3.	687	20.12.2017	21.12.2017
4.	712	21.12.2017	22.12.2017

Constable Fazal No. 511 was failed to attend the office, due to which Ex-part action was also initiated against him vide this office Memo. No.714/S, Dated 22.12.2017. All the relevant contents are attached herewith.

Recommendation:

Therefore, Constable Fayaz No.511/FC is hereby strongly recommended for Major punishment, please.

Enclosed: (18 -Pages)

Sub Divisional Police officer,
Circle Razzar, Kernal Sher Kelli.

PSO
ISSUE FSCM,
[Signature]

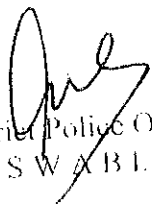
DPO Swabi
11/10

SUMMARY OF ALLEGATIONS

51

It is alleged that Constable Fayyaz Belt No. 511, while posted to Police Lines Swabi absented himself from duty with effect from 05.11.2017 till date without any leave/prior permission of the competent authority. In this regard, the delinquent was issued a Show Cause Notice vide this office No. 279/PSO, Dated 04.12.2017 but he neither received the Show Cause Notice nor join back his duty and meanwhile, he has also involved himself in case vide FIR No. 55 Dated 03.12.2017 U/s 381-A & FIR No. 56 Dated 05.12.2017 U/s 381-A PS Ulla, which speaks of his inefficiency and amounts to gross misconduct. Hence, summary of allegations and charge sheet issued against him.

MR. SHAH MUMTAZ KHAN, SDPO RAZZAR is appointed to conduct proper departmental enquiry against him.


District Police Officer,
S W A B I.


No. 42 /CC/PSO,
Dated. 11 / 12 /2017

Whereas I am satisfied that formal enquiry as contemplated by Khyber Pakhtunkhwa Police Rules 1975 is necessary and expedient.

And whereas I am of the view that the allegations if established would call for Major/Minor penalty as defined in Rules 4(b) a & b of the aforesaid Rules.

Now therefore as required by Rules 6(1) of the aforesaid Rules I Mr. **Sohail Khalid, PSP**, District Police Officer, Swabi charge you Constable Fayyaz Belt No. 511 on the basis of statement of allegations attached to this charge sheet.

In case your reply is not received within seven days without sufficient cause it will be presumed that you have no defence to offer and ex parte action will be taken against you.


District Police Officer.
S W A B I.

55

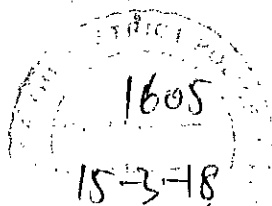
ORDER.

This order will dispose-off the appeal preferred by **Ex- Constable Fayaz No. 511** of Swabi District Police against the order of District Police Officer, Swabi, whereby he was awarded Major punishment of dismissal from service vide District Police Officer, Swabi OB No: 48 dated 15.01.2018.

Brief facts of the case are that, the appellant while posted at Police Lines, Swabi absented himself from duty with effect from 05.11.2017 till the date of his dismissal without any leave or prior permission of the competent authority and meanwhile, he was also involved himself in case vide FIR No. 53 dated 03.12.2017 u/s 381-A PPC PS Utla, FIR No. 54 dated 03.12.2017 u/s 381-A/411 PC PS Utla, FIR No. 55 dated 08.12.2017 u/s 381-A/411 PPC PS Utla and FIR No. 56 dated 08.12.2017 u/s 381-A/411 PPC PS Utla which is highly against the discipline and amounts to gross misconduct. In this connection he was issued a Show Cause Notice. He was directed time and again to receive his Show Cause Notice but he did not bother to receive, as such he was served with Charge Sheet and summary of allegations and SDPO Razzar was appointed as Enquiry Officer. The Enquiry Officer conducted proper departmental enquiry, collected evidence and recorded statements of all concerned. The Enquiry Officer submitted his findings wherein he found the alleged Constable guilty for the misconduct and recommend him for Major Punishment. The District Police Officer, Swabi perused the enquiry papers, findings and by agreeing with the Enquiry Officer issued him Final Show Cause Notice and as per rules, he was bound to receive his Final Show Cause Notice but neither he attended the office nor collected Final Show Cause Notice, which means that he has nothing to offer in his defence and hence, deserves the ex-parte action on the aforementioned grounds. Therefore he was dismissed from service from the date of absence i.e 05.11.2017.

On his appeal for re-instatement in service, he was called in Orderly Room held in this office on **07.03.2018**, and heard him in person, but he did not produce substantial proof/evidence in his defence. So, Officer Incharge of the cases alongwith case file was called to ascertain the real fact. The Officer Incharge confirmed his involvement in the stolen property cases and disclosed that during the investigation of the case the stolen property was recovered from possession of the appellant. Therefore being involved in a heinous crime against humanity, involvement in such like shameful acts, his retention in Police Service shall certainly affect the dignity and image of Police Force as well as his colleagues. The appellant has no right for retention in Police Department, besides the appellant was also discharged from service earlier on 17.10.2012. **The appeal is rejected.**

ORDER ANNOUNCED.



(Muhammad Alam Shinwari)PSP
Regional Police Officer,
Mardan

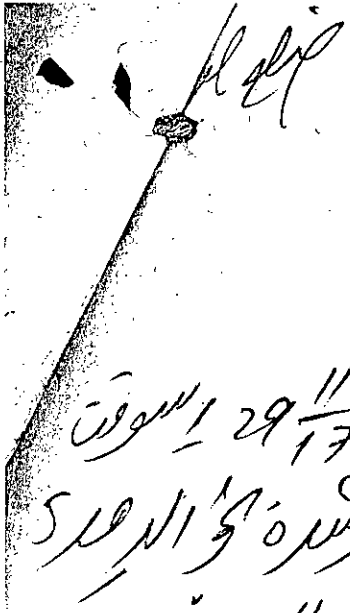
OB/EC
No. 1504 /ES, Dated Mardan the 13/03 /2017.

Copy to District Police Officer, Swabi for information and necessary action w/r to his office
Memo: No. 57/Insp: Legal dated 28.02.2018. The Service Record is returned herewith.

DP Swabi (*****)
14/3

لويس لادن

نقل عدد 17 افرنا 3 29 17 17 17



عدد 17 افرنا 3 29 17 17 17
وقت 10:00 في يوم 29 17 17
نقل من 5 11
او 29 17 17 17 17
من 17 17 17 17 17

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29-11-17

mm PL Swabi

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فصل

تاریخ روز 30 11 17

السنه

6 گنہار خان کے طرف سے لاؤٹ 20.00 روپے

30.11.17

بیت

گنہار خان کے قریب قلعہ کے دروازے کے پاس

سے 5 روپے کی رقم وصول ہوئی

کل رقم 20 روپے ہے جس میں سے 15 روپے

فصل

تعمیرات کے لئے

[Signature]

5/5

Forwarded

with

Colswick

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