


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No. 902/2024**


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/06/2024	<p>The appeal of Mr. Haroon resubmitted today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 02.07.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> <b>REGISTRAR</b></p>

The appeal of Mr. Haroon received today i.e on 24.06.2024 is incomplete on the following score which is returned to the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Affidavit is not attested by the Oath Commissioner.
- 3- Check list is not attached with the appeal.
- 4- Annexures of the appeal are unattested.
- 5- Annexure-I of the appeal is illegible.
- 6- Four more copies/sets of the appeal along annexures i.e. complete in all respect may also be submitted with the appeal.

No. 257 /Inst./2024/KPST,

Dt. 25/6 /2024.

  
25/6/24  
OFFICE ASSISTANT  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Taimur Ali Khan Adv.  
High Court Peshawar.

Respected Sir,

- 1- Removed
  - 2- Removed
  - 3- Removed
  - 4- Removed
  - 5- Better copies of Annexure - I prepared
  - 6- Removed
- All office objections removed and resubmitted ✓
- Adv: Shauqir Anwar Farooq

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

SERVICE APPEAL NO. 902 /2024

Haroon

VS

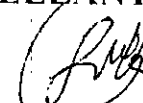
Police Deptt

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**APPELLANT**

THROUGH:

  
(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT  
Cell No.03339390916

&   
(SHAKIR ULLAH TORANI)  
ADVOCATE

①

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

SERVICE APPEAL NO. 902/2024

Khyber Pakhtunkhwa  
Service Tribunal

Diary

13726

Dated

24-06-2024

Haroon, Ex-Class-IV, (Langri),  
Elite Force, Peshawar.

(APPELLANT)

VERSUS

1. The Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
2. The Superintendent of Police, HQrs. Elite Force, Peshawar.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974  
AGAINST THE ORDER DATED 21.02.2024, WHEREBY  
THE APPELLANT HAS BEEN DISMISSED FROM THE  
SERVICE AND AGAINST NOT TAKING ACTION ON THE  
DEPARTMENTAL APPEAL OF THE APPELLANT  
WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE  
ORDER DATED 21.02.2024 MAY PLEASE BE SET ASIDE  
AND THE APPELLANT MAY KINDLY BE REINSTATED  
INTO SERVICE WITH ALL BACK AND  
CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY  
WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND  
APPROPRIATE THAT MAY ALSO BE AWARDED IN  
FAVOUR OF APPELLANT.

(2)

**RESPECTFULLY SHEWETH:**  
**FACTS**

1. That the appellant was appointed as Langri in Elite Police Training Centre Nowshera in the year 2016 after fulfilling all formalities by the respondent department and since his appointment the appellant was performing his duty with devotion and honesty whatsoever assigned to him and no complaint has been filed by his superiors regarding his performance.
2. That the appellant was regularly performing his duty with his best ability and capability and was given training in his field/cadre i.e langari by in the EPTC, Nowshera and on completion of his course/training the Principal of the EPTC Nowshera has granted commendation certificate to the appellant for successfully completion of course and clearly mentioned in recommendation certificate as **qualified. (Copy of commendation certificate is attached as Annexure-A)**
3. That the appellant being Langri along with the other officials were sent to Serena Hotel Peshawar for training in their respective vide letter dated 17.11.2023 and as the appellant was working as Langri in the department, therefore, the management of the Serena Hotel assigned training and duty of Langri to the appellant, which was successfully performed by the appellant. **(Copy of letter dated 17.11.2023 is attached as Annexure-B)**
4. That the appellant after completing his training in the Serena Hotel reported back to Police Lines, but he was transferred to D. Khan on departmental proceeding through an memo dated 31.01.2024 and also show cause notice served to him under Police Rules 1975 (amended 2014) on the same day in which following allegation was leveled against him that you have been enlisted as Langri in Elite Force, moreover, you were also departed to get experience by virtue of incapability in respective cadre but you did not take interest and returned without obtaining any training, which shows a gross misconduct on your part. The appellant submitted his reply to show cause notice in which clearly mentioned that he was enlisted as Langri in the department and was performing his duty with honesty and he has full command of cooking bread and on sending to Serena Hotel Peshawar for training, he has assigned the training and duty of Langri (cooking bread) and as Langri he can cook any kind of bread and is ready for test. **(Copies of memo dated 31.01.2024, show cause notice and reply to show cause are attached as Annexure-C, D & E)**
5. That charge sheet along with statement of allegations on above mentioned charge were issued to the appellant under Civil Servants (E&D) Rules, 2011. The appellant submitted his reply to the charge sheet and gave the same stance as given in show cause notice. **(Copies**

3

of charge sheet along with statement of allegations and reply are attached as Annexure-F&G)

6. That inquiry was conducted against the appellant, but the appellant was never associated with the inquiry proceeding in order to defend himself, even the inquiry report was not provided to the appellant to the appellant along with final show cause notice, therefore the appellant filed an application to provide him the inquiry report on which inquiry report was provided to him and in the inquiry report the inquiry officer mentioned that the delinquent Class-IV (appellant) appeared before the undersigned in person and recorded his written statement and was also cross examined but it necessary to mention here that the appellant was never appeared before the inquiry officer rather reader of SP HQrs Mohsin handed over questionnaire to the appellant through Class-IV and directed the appellant to answer the questions. It is also necessary to mention here that in the inquiry report, the inquiry officer mentioned that the delinquent Class-IV Haroon (Langri) was examined in his cadre (Cooking). Cooking test was conducted through CDI Elite Force HQrs. He could not qualify and failed, but test has not been taken from the appellant by any official. **(Copies of application, inquiry report and questionnaire are attached as Annexure-H,I&J)**
7. That final show cause was issued to the appellant under Police Rules 1975. The appellant submitted his reply to the final show cause notice and gave the same stance as given to show cause notice and charge sheet. **(Copies of final show cause notice and reply are attached as Annexure-K&L)**
8. That on the basis of above baseless allegation and without conducting proper inquiry, the appellant was dismissed from service vide order dated 21.02.2024 under Police Rules 1975 (amended 2014) and in the dismissal order dated 21.02.2024 besides allegation mentioned in the charge sheet, it also was mentioned that similarly once again the delinquent Class-IV Haroon (Langri) was examined in his cadre (Cooking). Cooking test was conducted through CDI Elite Force HQrs but could not qualify and failed, but test has not taken from the appellant by any official. The appellant filed departmental on 06.03.2024 against the dismissal order dated 21.02.2024, which was not responded within the statutory period of ninety days. **(Copies of order dated 21.02.2024 and departmental appeal are attached as annexure-M&N)**
9. That the appellant now wants to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

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**GROUNDS:**

- A) That the orders dated 21.02.2024 and not taking action on the departmental appeal of the appellant within the statutory period of ninety days are against the law, rules, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) That in the inquiry proceeding, the appellant was never associated with the inquiry proceeding in order to defend himself, which is violation of law and rules and as such the impugned order is liable to be set aside on this ground alone.
- C) That in the inquiry report the inquiry officer mentioned that the delinquent Class-IV (appellant) appeared before the undersigned in person and recorded his written statement and was also cross examined, but the appellant was never appeared before the inquiry officer rather Reader of SP HQrs Namely, Mohsin handed over questionnaire to the appellant through Class-IV and directed the appellant to answer the questions and such conduct of the respondent department is against the law and rules and such the impugned order dated 21.02.2024 is liable to be set aside.
- D) That in the inquiry report as well as in the impugned dismissal order dated 21.02.2024, it was mentioned that Cooking test was conducted through CDI Elite Force HQrs from the delinquent Class-IV (appellant). He could not qualify the test and failed, but test has not been taken from the appellant by any official and the appellant was dismissed from service without any solid reason and proof to judge the efficiency in his field/cadre i.e Langari, and as such the impugned dismissal order dated 21.02.2024 is against the norms of justice and fair play.
- E) That the appellant was appointed as Langeri in the year 2016 after fulfilling all the codal formalities by the respondent department and served the department for about 08 years and in this respect recommendation certificate was also awarded for his good performance and after serving for about long period of 08 years, he was dismissed from service on the ground of incapability in respective cadre, which is against the norms of justice and fair play.
- F) That the appellant was enlisted as Langri in the department whose duty is to cook the bread and also was sent for training at Serena Hotel Peshawar in his cadre i.e Langari and Management of Serena Hotel also assigned the duty and training of Langri to the appellant, but in

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impugned order dated 21.02.2024 it was mentioned that the appellant was examined in his cadre (cooking), cooking test was conducted through CD/ Elite Force HQrs but could not qualify and failed, which means that the appellant has dismissed from service for no invalid reason and has been punished for no fault on his part as his duty was to cook the bread and not the meal.

- G) That the appellant has properly attended the training at Serena Hotel Peshawar arranged by the department and after completing his training he reported back to Police Lines, but he dismissed from service on baseless allegations of not taking interest and returned without obtaining any training, which means that the appellant was dismissed from service on baseless allegations without conducting regular to dig out the reality about the allegation, which is against the norms of justice and fair play.
- H) That the appellant was also discriminated as Deputy Commandant Elite Force directed respondent No.2 vide memo dated 31.01.2024 to initiate disciplinary proceeding against different officials, but no action has taken against them while the appellant was dismissed from service on baseless allegation which is clear violation of Article-25 of the Constitution of Pakistan.
- I) That the opportunity of personal hearing and personal defense was not provided to the appellant, which is against the spirit of Article 10-A of the Constitution.
- J) That the appellant has been condemned unheard and has not been treated according to law and rules and has been punished for no fault on his part and as such the impugned order dated 21.02.2024 is liable to be set aside.
- K) That the appellant is class-IV employee but he was proceeded under Police Rules 1975 (amended 2014), which is against the law and rules.
- L) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.



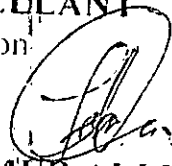
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It is, therefore, most humbly prayed that the acceptance of this appeal, the order dated 21.02.2024 may please be set aside and the appellant may kind be reinstated into service with all back and consequential benefits. Any other remedy which this Honorable Tribunal deems fit and appropriate that may also be awarded in favour of appellant.

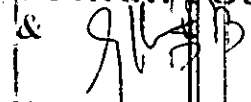


APPELLANT  
Haroon

THROUGH:



(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT



(SHAKIR ULLAH TORANI)  
ADVOCATE

②

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

SERVICE APPEAL NO. \_\_\_\_\_ /2024

Haroon

VS

Police Department

**AFFIDAVIT**

I, Ex-Class-IV, (Langri), Elite Force, Peshawar, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.

  
**DEPONENT**

(8)

Police Training Center  
Nowsheerabad  
Nowsheerabad

ELITE POLICE TRAINING CENTER

### Commendation Certificate Class III

This Certificate is Awarded to

SAJEEB KHAN LANGARI S/O NISAR

This Certificate is Awarded on successful completion of Cooking Course

Qualified

Signature

Elite Police Training Center  
Nowsheerabad

O.B. NO

DATE 23-06-2023

Elite Police Training Center, Nowshera



Commendation Certificate  
Class III

*This Certificate is Awarded to*

Mr. Haseem Khan Langri

S/O Nisar Khan

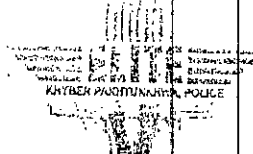
R/O District Peshawar

is hereby Granted Cash Reward of Rs. 1000/- & ee III certificate on  
Account of Good performance.

O.B. NO. 20

DATED 31/12/21

Senior Superintendent of Police,  
Admn./Security  
Elite Police Training Center, Nowshera



OFFICE OF THE SUPERINTENDENT OF POLICE,  
HEADQUARTERS, ELITE FORCE, PESHAWAR

B  
10

No. 10374/R.SP/HQr, EF,

Date: 17/11/2023

To, The Manager of Serena Hotel,  
Peshawar.

Subject: COOKING TRAINING

It is submitted that the following officials of Elite Force are sent to be trained in their respective cadres, please.

S.No.	Name	Designation	Posting
1.	FC Murad No. 231,	Cook	Elite HQrs Peshawar
2.	Tassawar Shah,	Cook	Elite HQrs Peshawar
3.	Haroon	Langar	Elite HQrs Peshawar
4.	Akhtar Munir	Cook	EPTC Nowshera
5.	Darvaish	Cook	EPTC Nowshera
6.	Himmat Khar	Cook	Banaru Region

(GHAN JEHAN DURRANI) PSP  
Superintendent of Police,  
HQrs, Elite Force, Peshawar.

Copy for information to the:-

1. Principal EPTC, Nowshera
2. DSP/HQrs, Elite Force, Peshawar.
3. Office Superintendent, Elite Force, Peshawar.
4. Line officer, Elite Force, Peshawar.
5. OASI, Elite Force, Peshawar.
6. CDI, Elite Force, Peshawar.

Att: [Signature]

no 1556-6371

Dated: 31/07/2024

Subject: **DIRECTIONS OF ADDL IGP ELITE FORCE KHYBER PAKHTUNKHWA DURING HEARING OF COOK.**

S. No.	Name of Official	Decision.	Action by
1.	Shehreyar Cook	To be dismissed from service after issuing a Show Cause Notice	SP HQrs: Elite Force Peshawar
2.	Murad Cook	Should be transfer to Miransha to report today, Pay stop, Proceed departmentally	SP HQrs: Elite Force Peshawar
3.	Mahir Ex CDI	Pay stop for keeping unqualified cooks.	Deputy Commandant
4.	Sher Khan Line officer	To be suspended, Pay stop & issue Show Cause Notice.	Deputy Commandant EF / SP HQrs: Elite Force Peshawar
5.	Hamat Cook	Transfer to Chitral, take test in cooking, in case of not qualify should be dismissed.	SP HQrs: Elite Force Peshawar
6.	Akhtar Munir Cook	Take test in cooking and report, In case of not qualifying be dismissed.	SP HQrs: Elite Force Peshawar
7.	Haroon Cook	Transfer to D.I Khan today followed by dismissal after enquiry	Deputy Commandant EF / SP HQrs: Elite Force Peshawar
8.	Shamsul Wahab Cook	Transfer to Miransha, To be awarded major punishment on medical grounds	SP HQrs: Elite Force Peshawar
9.	Usman Sher Cook	Pay stop. Transfer to Miransha, to be awarded major punishment on medical grounds	SP HQrs: Elite Force Peshawar

(ABDUS SAMAD) PSP  
Deputy Commandant  
Elite Force Khyber Pakhtunkhwa Peshawar

Copy to the:-

1. Superintendent of Police, Elite Force, HQrs: Peshawar.
2. Regional Commander Elite Force Malakand Region.
3. SP NMDs Elite Force Khyber Pakhtunkhwa.
4. Accountant Elite Force, RRP Peshawar & EPIC Nowshera.
5. CDI Elite Force Peshawar



OFFICE OF THE SUPERINTENDENT OF POLICE,  
HQRS, ELITE FORCE PESHAWAR



12


SHOW CAUSE NOTICE

Under Rule 5 (3) (c) of Khyber Pakhtunkhwa Police Rules, 1975 (Amended 2014)

That you Class-IV Haroon (Langri) have rendered yourself liable to be proceeded against departmentally under Rule 5(3) of the Khyber Pakhtunkhwa Police Rules 1975 (Amended 2014) for the commission of misconduct and negligence in duty enumerated below -

*You have been enlisted as Langri in Elite Force, moreover, your wife also departed to get experience by virtue of incapability in respective cadre but you did not take interest and returned without obtaining any training, which shows a gross misconduct on your part.*

2. That by reason of above and sufficient material placed before the competent authority; it is decided to proceed against you in General Police Proceeding without aid of enquiry officer as contemplated in Rule 5(3)(c) of Police Rules 1975 (Amended 2014).
3. That the misconduct on your part is prejudicial to good order and service discipline.
4. That your retention in the Police force will amount to encouragement of anti social elements, inefficient and corrupt Police officers.
5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by imposing upon you one or more of the major punishments as provided in the rules.
6. You are, therefore, called upon to show cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 (Amended 2014) for the commission of misconduct mentioned above.
7. You should submit reply to the show cause notice within 03 days of its receipt failing which an ex-parte action shall be taken against you.
8. You are further directed to inform the undersigned that you wish to be heard in person or not.

  
SHABIR HUSSAIN SHAH  
Superintendent of Police  
HQrs, Elite Force, Peshawar.

No 357-58 /R,SP/HQrs. EF.

Date: 31/01/2024

This show cause notice served upon the delinquent Class-IV Haroon (Langri) through  
CDI Elite Force HQrs Peshawar.





OFFICE OF THE SUPERINTENDENT OF POLICE,  
HQRS, ELITE FORCE PESHAWAR

CHARGE SHEET

I, Shabir Hussain Shah, Superintendent of Police HQrs, Elite Force, Khyber Pakhtunkhwa Peshawar as competent authority, hereby charge you Class IV Haroon (Langri) of Elite Force as follows:

1. *You have been enlisted as cook in Elite Force, moreover, you were also sent to get experience by virtue of incapability in respective cadre but you did not take interest and returned without obtaining any training, which shows a gross misconduct on your part.*

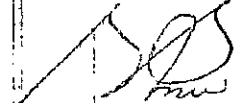
2. By reason of the above, you appear to be guilty of misconduct under the Civil Servants (Efficiency & Disciplinary) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in the said rules.

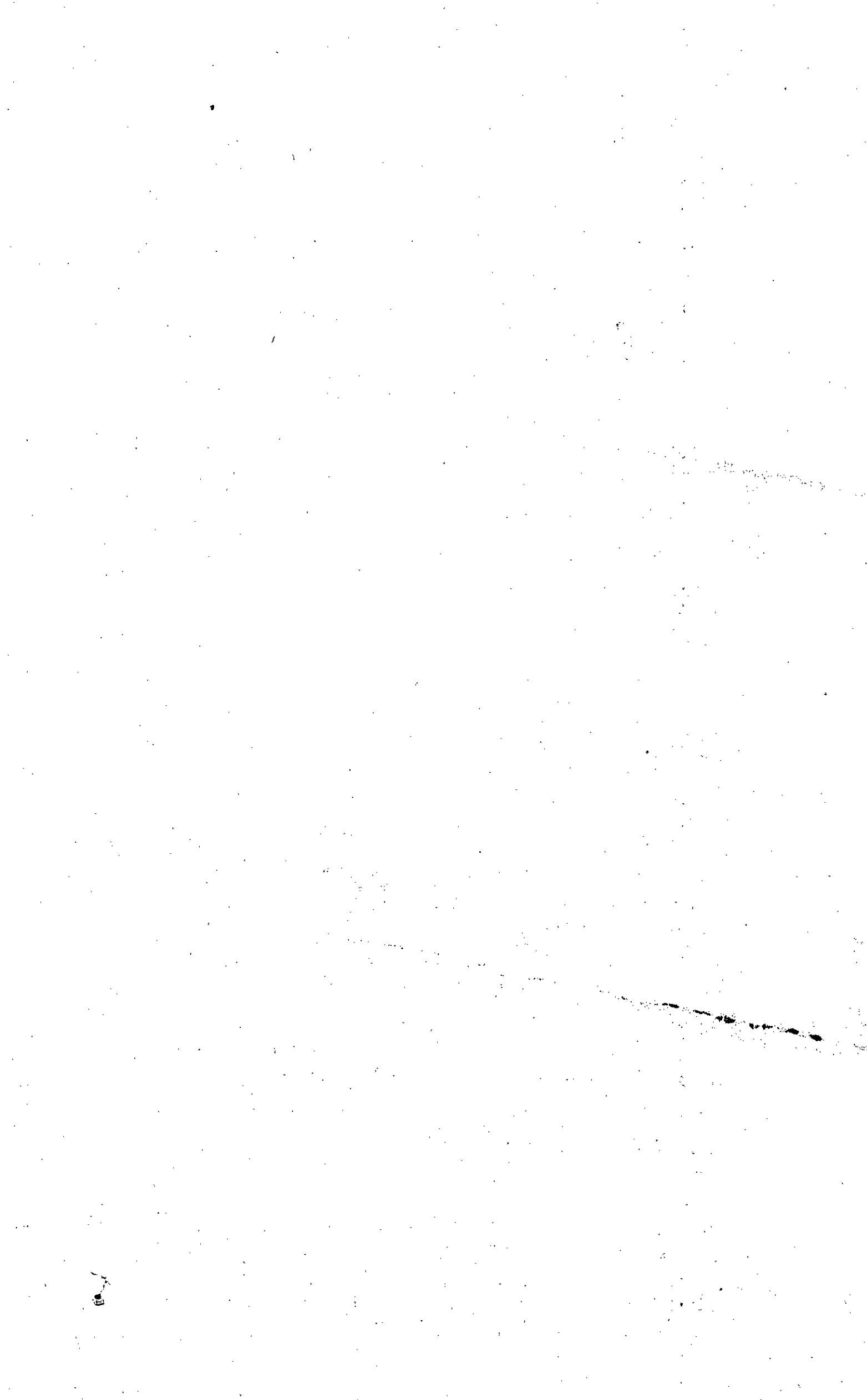
3. You are, therefore, directed to submit your defense within seven days of the receipt of this Charge Sheet to the Enquiry Officer.

4. Your written defense, if any, should reach 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 ex-parte action shall be taken against you.

5. You are directed to intimate whether you desire to be heard in person.

6. A statement of allegation is enclosed.

  
SHABIR HUSSAIN SHAH  
Superintendent of Police,  
HQrs Elite Force, Peshawar



OFFICE OF THE SUPERINTENDENT OF POLICE,  
HQRS, ELITE FORCE PESHAWAR

SUMMARY OF ALLEGATIONS

I, Shabir Hussain Shah, Superintendent of Police HQrs, Elite Force, Khyber Pakhtunkhwa Peshawar as competent authority in the opinion that Class IV Haroon (Langri) has rendered himself liable to be proceeded against departmentally as he has committed the following acts and omissions within the meaning of Civil Servants (Efficiency & Disciplinary) Rules, 2011.

SUMMARY OF ALLEGATIONS

1. He has been enlisted as cook in Elite Force, moreover, he was also sent to get experience by virtue of incapability in respective cadre but he does not take interest and returned without obtaining any training, which shows a gross misconduct on your part.

2. For the purpose of scrutinizing the conduct of the said delinquent Class-IV with reference to the above allegations Mr. Ijaz Abazai DSP/HQrs, Elite Force Peshawar is appointed as Enquiry Officer.

3. The Enquiry Officer shall, in accordance with the provision of the said Ordinance shall provide reasonable opportunity of hearing to the delinquent Class-IV record statements etc and submit findings within (25 days) after the receipt of this order.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the enquiry officer.

SHABIR HUSSAIN SHAH  
Superintendent of Police,  
HQrs Elite Force, Peshawar.

No. 389-93 R/SP/HQrs/EF,

dated Peshawar the 02/02/2024.

Copies to the:-

5. Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
6. Accountant, of Elite Force, Khyber Pakhtunkhwa Peshawar.
7. OASI/SRC/FMC, Elite Force, Khyber Pakhtunkhwa Peshawar.
8. This Charge Sheet and Summary of Allegations to be served upon the delinquent Class IV Haroon (Langri) through reader to DSP/HQrs, Elite Force, Peshawar.

SHABIR HUSSAIN SHAH  
Superintendent of Police,  
HQrs Elite Force, Peshawar.

03119685700  
12

11/13/13

Handwritten notes in a cursive script, likely Hebrew or Arabic, filling the main body of the page. The text is organized into several columns by vertical lines.

16

11/13/13

9/21 (1)  
5 2/3

12/1/2024

Handwritten notes in Hindi, possibly starting with 'आज का दिन' (Today's day).

12/06/2024

12/06/2024

Handwritten notes in Hindi, possibly starting with 'आज का दिन' (Today's day).

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Handwritten notes in Hindi, possibly starting with 'आज का दिन' (Today's day).

11/17

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OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE,  
HEADQUARTERS, ELITE FORCE, PESHAWAR

Date: 12/02/2024

No: [unclear]  
To: [unclear]  
[unclear]

Subject: DEPARTMENTAL ENQUIRY AGAINST CLASS-III HADDON (LANGER)

Kindly refer to [unclear] dated Peshawar, (10)  
12/02/2024

In pursuance of [unclear] assigned has completed  
enquiry in the above cited [unclear]

ALLEGATIONS:

That the delinquent [unclear] existed at [unclear]  
in [unclear] moreover [unclear] by virtue of incapacity in  
respect to cadre but he did not [unclear] without obtaining any [unclear],  
which shows a gross misconduct in the part

PROCEEDINGS:

In this regard Superintendent of Police, HQrs, Peshawar issued [unclear]  
Charge Sheet & Summary of Allegations and Deputy Superintendent of Police  
Headquarters, Elite Force was appointed as enquiry officer

Charge Sheet & Summary of Allegations was served upon the delinquent  
on [unclear] 2024, in reply to Charge Sheet & Summary of Allegations the  
delinquent [unclear] from the undersigned in person and received [unclear]  
[unclear]

Better Copy (13)

OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE  
HEADQUARTERS, ELITE FORCE PESHAWAR

No 18/R/DSP-EF/HQrs

Dated 13/02/2024

To

The Superintendent of Police  
HQRs Elite Force Peshawar

Subject: DEPARTMENTAL ENQUIRY AGAINST CLASS-IV HAROON  
(LANGRI)

Kindly refer to your office Endst No. 389/93/EF dated Peshawar the  
02.02.2024.

In pursuance of your kind directives the undersigned has completed  
enquiry in the above cited case its stepwise detail a given below.

ALLEGATIONS

That the delinquent Class-IV Haroon (Langri) has been enlisted as  
Langri in Elite Force moreover he was also  
sent to get by virtue of disciplinary in respective cadre but he did not take  
interest and returned without obtaining any training which shows a gross  
misconduct on his part.

PROCEEDINGS

In this regard Superintendent of Police, HQRs Peshawar Issued him  
Charge Sheet & Summary of Allegations and Deputy Superintendent of Police  
Headquarters Elite Force was appointed as enquiry officer.

Charge Sheet & Summary of Allegations was served upon the delinquent  
Class IV on 02.02.2024 in reply to Charge Sheet and summary of Allegations  
the delinquent Class IV appeared before the undersigned in person and  
recorded the written statement and was also cross examined (Enclosed).

122 ABAYA

THE DEPARTMENT OF THE ARMY  
WASHINGTON, D. C. 20315  
OFFICE OF THE ADJUTANT GENERAL  
ATTENTION: THE ADJUTANT GENERAL  
OFFICE OF THE ADJUTANT GENERAL  
ATTENTION: THE ADJUTANT GENERAL

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ATTENTION: THE ADJUTANT GENERAL

THE DEPARTMENT OF THE ARMY  
WASHINGTON, D. C. 20315  
OFFICE OF THE ADJUTANT GENERAL  
ATTENTION: THE ADJUTANT GENERAL  
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ATTENTION: THE ADJUTANT GENERAL

(61)



Better Copy: - (12)

## FINDINGS

Keeping in view all the circumstances it has been reflected that the delinquent Class-IV (Langri) was examined in his cadre (Cooking) test was conducted through CDI Elite Force HQRs. He could not qualify and failed. Moreover upon perusal vide order No. 6789/OASI/EF dated 18.05.2023 he was sent to EPTC Nowshera as well as vide orders No. 1037-43/R/SP/HQRs EP dated 17.11.2023 the delinquent class-iv was also sent to hotels (Sheraz Romaq & Serene) for obtaining training in his respective cadre (Cooking) but he did not take interest and returned without getting experience and just passing his time.

## CONCLUSION RECOMMENDATION

Having gone through the all materials placed on record as under:

Show Cause Notice

Reply to show cause notice

Statement of CDI

Statement of the delinquent Class-IV

The undersigned has reached to conclusion that the delinquent Class-IV Haroon (Langri) does not take interest to perform his duty as cook and despite of training he could not cook and not even tried to take interest in cooking. Therefore the charges leveled him in Charge Sheet are stand proved.

IJAZ ABAZAI

Deputy Superintendent of Police

HQRs Elite Force Peshawar

13/11/2010

13/11/2010

Handwritten notes in Urdu script, organized into columns by vertical lines. The text is dense and appears to be a record or a list of items.

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OFFICE OF THE SUPERINTENDENT OF POLICE,  
HQRS, ELITE FORCE PESHAWAR



FINAL SHOW CAUSE NOTICE

KQ2

I, Shabir Hussain Shah, Superintendent of Police HQrs, Elite Force, Peshawar, as competent authority, under Khyber Pakhtunkhwa Police Disciplinary rules, 1975 (Amendment 2014) do hereby serve upon you Class-IV Haroon (Langri) of Elite Force as follow:

That you have been enlisted as Langri in Elite Force, moreover, you were also sent to get experience by virtue of incapability in respective cadre but you did not take interest and returned without obtaining any training, which shows a gross misconduct on your part.

1. Ongoing through the finding and recommendation of the enquiry officer, the material placed on record, I am satisfied that you have committed the omission/commission specified in Police Rules and charges leveled against you have been established beyond any doubt.

2. As a result therefore, I, Shabir Hussain Shah, Superintendent of Police HQrs, Elite Force, Peshawar as competent authority have tentatively decided to impose major penalty upon you, under Police Rules of the said ordinance.

3. You are, therefore, directed to show cause as to why the aforesaid penalty should not be imposed upon you, also intimate whether you desire to be heard in person.

4. If no replay to this notice is received within stipulated time of its delivery in normal course of circumstances, it shall be presumed that you have no defence to put in and in that case an ex- parte action shall be taken against you.

SHABIR HUSSAIN SHAH  
Superintendent of Police,  
HQrs, Elite Force, Peshawar.

No 461-62 /R.SP/HQrs, EF,

Date: 13/02/2024

This final show cause notice served upon the delinquent Class-IV Haroon (Langri) through reader to DSP HQrs, Elite Force, Peshawar and report this office.

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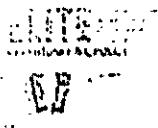
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OFFICE OF THE SUPERINTENDENT OF POLICE,  
HQRS, ELITE FORCE PESHAWAR



M/23

No. 51521/R, SP/HQr, EF,

22-02-24

date 21/02/24

ORDER

This order will dispose of the departmental enquiry against the delinquent Class-IV Haroon (Langri). That he was enlisted as Langri in Elite Force, moreover, he was also sent to get experience by virtue of incapability in respective cadre but he did not take interest and returned without obtaining any training.

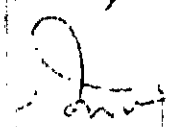
Similarly once again the delinquent Class-IV Haroon (Langri) was examined in his cadre (Cooking), cooking test was conducted through CDI Elite Force HQrs but could not qualify and failed.

In this regard Charge Sheet and Summary of Allegations vide No.389-93/R/SP/HQrs/EF dated: 02.02.2024 was issued him and Mr. Ijaz Abazai, Deputy Superintendent of Police, HQrs, Elite Force, Peshawar, was appointed as enquiry officer. Enquiry officer found him guilty during the course of enquiry.

Similarly, the delinquent Langri was issued vide final Show Cause Notice No. 461-62/R, SP/HQrs, EF, dated: 13.02.2024. Responding to Final Show Cause Notice he submitted his written reply in OR but could not satisfy the undersigned.

Therefore I, Mr. Shabir Hussain Shah, Superintendent of Police, HQrs, Elite Force, Peshawar, being a competent authority in view of the above facts and recommendation of enquiry officer, major punishment "dismissal from service" is hereby awarded upon the delinquent Class-IV Haroon (Langri) under Police Rules 1975 (Amended 2014)

Order announced!

  
SHABIR MUSSAIN SHAH  
Superintendent of Police,  
HQrs, Elite Force, Peshawar.

Copy of the above is forwarded for information to the:

1. Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Superintendent of Police, HQrs, Elite Force, Peshawar.
3. Accountant, of Elite Force, Khyber Pakhtunkhwa Peshawar.
4. PA to Additional Inspector General of Police, Elite Force, Khyber Pakhtunkhwa, Peshawar,
5. Incharge Kot Elite Force, HQrs: Peshawar,
6. SRC /OASI Elite Force Khyber Pakhtunkhwa, Peshawar.
7. FMC Elite Force Khyber Pakhtunkhwa, Peshawar along with (19 Pages).

Contract No. 0311-9685700

U.S. Army Corps of Engineers  
Contract No. 0311-9685700

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D.Nr. 1369  
6/3/2024

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**VAKALAT NAMA**

NO. \_\_\_\_\_/2024

IN THE COURT OF Khyber Pakhtunkhwa Service Tribunal Pesh  
Haroon

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS


Police Deptt. (Respondent)  
(Defendant)

I/We, Haroon


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

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

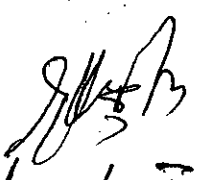
Dated \_\_\_\_\_/2024

  
\_\_\_\_\_  
(CLIENT)

ACCEPTED

  
**TAIMUR ALI KHAN**  
Advocate High Court

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

  
Adv: Shaker Ullah Torani