

The appeal of Mr. Inam Ullah received today i.e on 12.08.2024 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent nos. 1 & 4 are un-necessary/improper parties, in light of the rules ibid and on the written-direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.

No. 557 /Inst./2024/KPST,

Dt. 12/8 /2024.

Amal Ullah
OFFICE ASISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Noor Muhammad Khattak Adv.
High Court at Peshawar.

R/sir,

Re-submitted after necessary completion.

[Signature]
16/8/24

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Case Title: Mam Ullah v/s Police Deptt CHECK LIST

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Whether appeal is within time?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Whether the enactment under which the appeal is filed mentioned?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Whether the enactment under which the appeal is filed is correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6	Whether affidavit is appended?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	Whether affidavit is duly attested by competent Oath Commissioner?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	Whether appeal/annexures are properly pagged?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10	Whether annexures are legible?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	Whether annexures are attested?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12	Whether copies of annexures are readable/clear?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13	Whether copy of appeal is delivered to AG/DAG?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15	Whether numbers of referred cases given are correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Whether appeal contains cutting/overwriting?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17	Whether list of books has been provided at the end of the appeal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18	Whether case relate to this court?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19	Whether requisite number of spare copies attached?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20	Whether complete spare copy is filed in separate file cover?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
21	Whether addresses of parties given are complete?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	Whether index filed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
23	Whether index is correct?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
24	Whether Security and Process Fee deposited? On	<input checked="" type="checkbox"/>	<input type="checkbox"/>
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On	<input checked="" type="checkbox"/>	<input type="checkbox"/>
26	Whether copies of comments/reply/rejoinder submitted? On	<input checked="" type="checkbox"/>	<input type="checkbox"/>
27	Whether copies of comments/reply/rejoinder provided to opposite party? On	<input checked="" type="checkbox"/>	<input type="checkbox"/>

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Noor M. Khattak

Signature: [Signature]
Dated: _____

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. 1217 /2024

INAM ULLAH

VERSUS

POLICE DEPTT:

INDEX

S NO	DOCUMENTS	ANNEX	PAGE
1.	Grounds of Service Appeal with affidavit	1-4
2.	Copy of Pay Roll for the month of Nov, 2023	A	5
3.	Copy of Naqal Mad Roznamcha dated 16/11/2022 of Police Lines Khyber	B	6
4.	Copy of order dated 06/01/2021	C	7
5.	Copy of order dated 16/11/2022	D	8
6.	Copy of order dated 28/03/2024	E	9-10
7.	Copy of departmental appeal	F	11
8.	Copy of enlistment order of Saeed Ullah, death order & Naqalmat No 20 Roznamcha dated 23/04/2019 of P.S Phandu	G-I	12-14
9.	Vakalat Nama		15

Dated: 05-08-2024

APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

1-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Khyber Pakhtukhwa
Service Tribunal

SERVICE APPEAL NO 1217 / 2024

Diary No. 14894

Dated 12-08-2024

Mr. Inamullah, Ex FC Belt No.117,
Police Department, HQ CCP Peshawar.....**APPELLANT**

VERSUS

- ✓ 1- The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2- The Capital City Police Officer Peshawar.
- 3- The Superintendent of Police , HQ CCP Peshawar.
- ✓ 4- The District Police Officer, Khyber.

..... **RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 25/03/2024, WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE HAS BEEN IMPOSED ON THE APPELLANT AND AGAINST INACTION OF THE RESPONDENTS ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal, the impugned order dated 25/03/2024 may very kindly be set aside and the appellant may kindly 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.

Filed to day

REGISTER/SHEWETH:

ON FACTS:

Brief facts giving rise to the present appeal are as under:

1. That after the demise of his brother namely Saeedullah during duty hours, the appellant being eligible in all respects was enlisted as Special Police Officer(SPO) and was later on regularized on 01-03-2020. Copy of pay roll for the month of November 2023 is attached as annexure..... **A**
2. That since enlistment the appellant had performed his duties to the entire satisfaction of his superiors and no complaint has ever noticed to the superiors against the appellant in his entire service

Re-submitted to -day and filed.

Registrar

12/8/24
Registrar
16/8/24

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL No 1217 / 2024

Mr. Inamullah, Ex FC Belt No.117,
Police Department, HQ CCP Peshawar.....**APPELLANT**

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 - 2- The Superintendent of Police, HQ CCP Peshawar.
- **RESPONDENTS**

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2. That since enlistment the appellant had performed his duties to the entire satisfaction of his superiors and no complaint has ever noticed to the superiors against the appellant in his entire service

career. Copies of Naqal Mad Roznamcha dated 16-11-2022 Police Lane Khyber are attached as annexure..... **B**


3. That the appellant in the first instance was transferred from Capital City Police Peshawar to DPO Khyber by the respondent No.2. Copy of Order dated 06-01-2021 is attached as Annexure..... **C**
4. That the appellant was subsequently transferred from Police Lane Khyber to PS Tirah Khyber by the respondent No.3. Copy of Order dated 16-11-2022 is attached as Annexure..... **D**
5. That the appellant while performing his duty as a result of an alleged unilateral inquiry on the charge of ghost/illegal employee was removed from service without conducting proper Departmental inquiry as per police E&D Rules, 1975. Copy of order dated 28-03-2024 is attached as annexure..... **E**
6. That feeling aggrieved from the impugned order dated 25/03/2024 the appellant preferred departmental appeal before the respondent No.2, however, no response was received despite lapse of statutory period of limitation Copy of the Departmental Appeal is attached as annexure..... **F**
7. That being aggrieved from the inaction of the respondents the appellant has no other option except to file the instant service appeal on the grounds inter-alia as under:

GROUND:

- A- That the impugned orders dated 25/03/2024 is 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 in accordance with law and rules by the respondent department 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 neither any charge sheet nor statement of allegations has been served on the appellant before issuance of the impugned order.
- D- That no personal hearing/defense was given to the appellant before imposing major penalty upon the appellant which is sheer violation of the rules and law on the subject.

- E- That the impugned order dated 25/03/2024 issued by the respondents in arbitrary and mala fide manner, therefore, the same is not tenable in the eye of law and liable to be struck down.
- F- That the treatment meted out to the appellant clearly based on discrimination and malafide and as such the respondents violated the principle of natural justice.
- G- That even otherwise the penalty imposed upon the appellant is very harsh by removing the appellant from service which does not commensurate with the facts and circumstances of the case of the appellant which is not maintainable in the eye of law.
- H- That the sacrifices rendered by the deceased brother of the appellant namely Saeedullah is a good ground for taking a lenient view by the respondents in respect of the appellant, hence, deserve reinstatement. Copies of enlistment order of Saeedullah, death order & Naqal mad 20 Roznamcha dated 23-04-2019 PS Phando are attached as annexure.....G,H & I.
- I- That no regular inquiry has been conducted by the respondents before issuance of the impugned office order dated 25.3.2024.
- J- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore, most humbly prayed that the Service appeal may kindly be accepted as prayed for.


APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

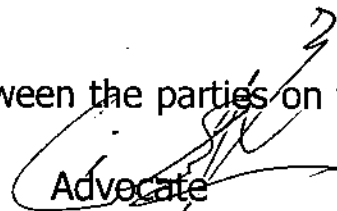
UMAR FAROOQ MOHMAND

WALEED ADNAN

KHANZAD GUL
ADVOCATES HIGH COURT

CERTIFICATE:

No such like appeal is pending or filed between the parties on the subject matter before this Honorable Tribunal.


Advocate

4-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

SERVICE APPEAL NO _____ / 2024

MR. INAMULLAH

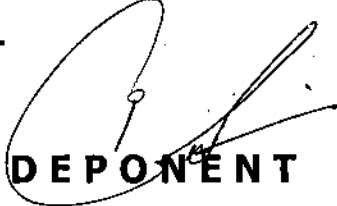
V/S

POLICE DEPTT:

AFFIDAVIT

I, Mr. Inamullah, Ex- FC Police Department, do hereby solemnly affirm and declare on oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble tribunal.




DEPONENT

S#:1 khyber

KA¹¹ -5-

P Sec:001 Month:November 2023
KH4037 -District Police Officer Kh
DISTRICT POLICE OFFICER K

Pers #: 00699858 Buckle:
Name: INAM ULLAH
CONSTABLE
CNIC No.1730109905667
GPF Interest Applied
07 Active Temporary

NTN:
GPF #:
Old #:

KH4037 -

PAYS AND ALLOWANCES:
0001-Basic Pay
1001-House Rent Allowance 45%
1210-Convey Allowance 2005
1300-Medical Allowance
1528-Unattractive Area Allow
1547-Ration Allowance
1567-Washing Allowance
1646-Constabulary R Allowance
1902-Special Incentive Allowance

18,130.00
2,384.00
1,932.00
1,500.00
1,000.00
1,000.00
150.00
300.00
775.00

Gross Pay and Allowances 43,646.00

DEDUCTIONS:

GPF Balance 39,451.00
3530-Police wel:Fud BS-1 to 18
4004-R. Benefits & Death Comp:

Subrc: 1,500.00
363.00
450.00

Total Deductions

2,313.00

41,333.00

D.O.B
02.03.1992

LFP Quota:
NATIONAL BANK OF PAKIBB DALAZAK CHOWK RI
4321815398

10 Years 06 Months 025 Days

khyber

A

S#:2 P Sec:001 Month:November 2023
KH4037 -District Police Officer
DISTRICT POLICE OFFICER P

Pers #: 00699858 Buckle:
Name: INAM ULLAH
CONSTABLE
CNIC No.1730109905667
GPF Interest Applied
07 Active Temporary

NTN:
GPF #:
Old #:

KH4037 -

PAYS AND ALLOWANCES:
2168-Fixed Daily Allowance
2314-Risk Allow Police - 2021
2378-Adhoc Relief All 2023 35%

2,730.00
7,400.00
6,345.00

Gross Pay and Allowances 43,646.00

43,646.00

DEDUCTIONS:

GPF Balance 39,451.00

Subrc:

Total Deductions

2,313.00

41,333.00

D.O.B
02.03.1992

LFP Quota:
NATIONAL BANK OF PAKIBB DALAZAK CHOWK
4321815398

10 Years 06 Months 025 Days

ATTENDED

*1 year back history
20 year
CONFIDENTIAL
OFFICE*

B

یوٹیس لائن

ب- 7B
تعلیق نمبر

نقل کروڑوں کا 16/11/08

مر 22 جولائی 2008ء کو وقت 16/11/08ء کو
اللہ/اللہ 117 آئی ڈی کے نام پر 13614
میلنگ ڈاکو /
میلنگ ڈاکو 13614 کے نام پر یوٹیس لائن کے
پر 13614 کے نام پر یوٹیس لائن کے

ATTESTED

مہاراجہ
یوٹیس لائن



08

ATTACHED

- 1. DPO Khyber.
- 2. PU CCP Peshawar.
- 3. FM CCP Peshawar.

action to the:-

Copy of the above is forwarded for information and necessary

1/2021

No 10951-5/0ASI

1/2021

3729

FOR CAPITAL CITY POLICE OFFICER
PESHAWAR

Constable Inam Ullah No. 117 is hereby transferred from Capital City Police Peshawar to DPO Khyber with immediate effect.

ORDER

OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR



1. C
- 7

OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR.

ORDER

Constable Inam Ullah No 1127 is hereby transferred from Capital City Police Peshawar to DPO Khyber with immediate effect.

For Capital City Police Officer
Peshawar.

OB No 3729/2021

No 10954-56/OASI

Dated Peshawar 01/06/2021

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

1. DPO Khyber
2. PO CP Peshawar
3. FM CCP Peshawar.

ATTESTER

OFFICE OF
THE DISTRICT POLICE OFFICER
KHYBER



"D"

-8-

ORDER

No. 7921 /OHC-Khyber. The following transfer/pastings are hereby ordered with immediate effect.

S.	NAME & RANK	FROM	TO
1.	HC Shakir Ullah No.148	Police Lines Khyber	PS Tirah (Under Suspension)
2.	FC Shahid Nawaz No.308	Police Lines Khyber	PS Tirah (Under Suspension)
3.	FC Inam Ullah No.2362	Police Lines Khyber	PS Tirah (Under Suspension)
4.	FC Fazal Ahmad No.255	Police Lines Khyber	PS Tirah (Under Suspension)
5.	FC Muhammad Ali No.1872	Police Lines Khyber	PS Tirah (Under Suspension)
6.	FC Sahib Majeed No.1833	PS Tirah	Police Lines Khyber
7.	FC Altaf Khan No.2233	PS Tirah	Police Lines Khyber
8.	FC Saif Ullah No.3208	PS Tirah	Bara Bazar Security
9.	FC Ilyas No.962	Police Lines Khyber	Inv : Wing Khyber
10.	HC Arshad Khan No.172	Police Lines Khyber	PS Bara
11.	FC Abdul Samad No.112	Police Lines Khyber	Asst : I/C Court Security Bara
12.	FC Niamat Gul No.793	PS Landi Kotal	Police Lines khyber
13.	FC Ismail No.3270	Police Lines Khyber	PS Ali Masjid
14.	FC Qanta Gul No.1199	Police Lines Khyber	PS BZK
15.	FC Inamullah No.P/117	Police Lines Khyber	Gunner SP Investigation Khyber

DB - NO: 1394

Date 16/11/2022

IMRAN KHAN (PSP)
DISTRICT POLICE OFFICER
KHYBER

No. 7922-25 /OHC-Khyber dated 16/11/2022.

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

1. SP/Investigation Khyber
2. DSP HQrs Khyber
3. Concerned SHO/Moharar for immediate departure/arrival
4. RI/Lines Officer, Khyber

ATTESTED



OFFICE OF THE
SUPERINTENDENT OF POLICE
HEADQUARTERS CCP PESHAWAR
Phone No. 091-9210737.

-9- "E"
Different case
from ghost one.

ORDER

A scrutiny was conducted to investigate the presence of certain police officials on duty, as their salaries were being regularly disbursed despite suspicions of being ghost/illegal employees. In this regards an enquiry against FC Inam Ullah Belt No. 117 in compliance to order vide N0.2914/PA dated 21-11-2023 was conducted and a committee was constituted under the supervision of the SSP Coordination , comprising the following members:

Mr. Tauheed Khan	DSP Investigation
Mr. Inam Ullah	DSP Legal
Mr.Naveed	Assistant Pay Branch

2. The committee was tasked with scrutinizing the duty status of many Officials including Inam Ullah Belt No. 117.
3. The committee initiated the process by drafting letter to the concerned bank, requesting account statement and account opening form of the salary holder. The purpose of obtaining this information was to cross-verify the presence of the mentioned individual on duty against the salary disbursement.
4. During the inquiry process, attempts were made to contact Mr. Inam Ullah Cell No. 0310-9513620 (CNIC No.17301-09905667) using the provided contact number.
5. The delinquent constable was called who appeared and submitted his statement wherein he contended that after the death of his brother Saeed Ullah, who was an SPO in Police department, he had preferred application to Police department for the post of Constable, where a Sub Inspector level OASI, whom he recognized by face, directed him to report in pay branch, his enlistment order will be issued soon. In Pay Branch, he joined his service with Haji Shahid and Wajid Khan. Then he was transferred to District Khyber vide OB No.3729, dated 06.01.2021. OASI CCP handed over him DD report of departure over which he reported at Police Lines Khyber and then he was posted by OASI Khyber in Account Office with Ali Raza. He was allotted belt No.117 and his salary was started on personal number 699858 from District Khyber. He opened his account No.4321815398 in National Bank, Dalazak Chowk, Ring Road, Branch code 232268. He further contended that while he was posted at Record Branch, Khyber, he was called to Police Lines Khyber for enquiry proceedings but he did not join enquiry proceedings on time due to illness of his father.
6. The accused Constable also produced his pay slip over which he had received his salaries. He also produced his bank statement commencing from 01.01.2021 to 30.11.2023, which shows that total amounts worth 1118220/- were received to the defaulter Constable so far. He also produced his ATM and service card.
7. OB No.3729/2021 of the enlistment order of the constable Inam Ullah was also verified from Order Book Clerk, the OB Clerk reported that OB No.3729/2021 did not find on the record. So, it is proved that the enlistment order issued vide OB ipid is totally fake and bogus.
8. The enquiry revealed that initially brother of Inam Ullah was recruited as an SPO in the year 2010, and was later on died due to heart attack in the year 2016/17. After a threadbare verification through OASI CCP and CRC office, it came to surface that the belt number 117 allegedly allotted to Constable Inam Ullah was found belt number of Constable Abdur Rehman placed on record whereas no Service Book of Constable Inam Ullah found on the record.

ATTESTED

9. Based on the evidence gathered, it is concluded by the enquiry committee that Inam Ullah No.117 is a fake/illegal/ghost employee. He was recruited vide OB No.3729/2021, which was found bogus/fake which shows that he initially recruited fraudulently and illegally without fulfilling any lawful procedure prescribed for recruitment of Constables. He never undergo any basic/recruit training. No Service Book etc of Inam Ullah No.117 found anywhere on record. Inam Ullah is unlawfully receiving salaries from the government exchequer. It was confirmed by the enquiry committee from the above that Inam Ullah No.117 is a fake/illegal/ghost employee.
10. Hence, in exercise of the powers mentioned in Section 4(1)(b)(iii) of Khyber Pakhtunkhwa Police Rules 1975 (amended 2014), Inam Ullah Personnel Number 699858 ghost/illegal employee is hereby removed from Police record. He is also liable to be proceeded against under Sections 110 & 115 of the Khyber Pakhtunkhwa Police Act, 2017 (Khyber Pakhtunkhwa Act No. II of 2017) and other relevant provisions of the Pakistan Penal Code.


SUPERINTENDENT OF POLICE
HQRS, CCP PESHAWAR.

No. 2874

Dated Peshawar the 25/03 2024.

OB No. 849

Dated: 28 103 2024.

Copies to:-

1. The Dy: Inspector General of Police, HQrs: Khyber Pakhtunkhwa at CPO Peshawar.
2. The Capital City Police Officer, Peshawar
3. The Senior Superintendent of Police, Operations, Peshawar
4. The Senior Superintendent of Police, Coordination, Peshawar
5. The District Police Officer, Khyber
6. The Pay Officer, EC-II, OASI, CRC & FMC
7. Inam Ullah s/o Saif Uddin r/o City Railway Station House No. 08 Street No. 08 Mohallah Gharibabad No. 02 Peshawar.

ATTACHED

Before the Capital City Police Officer, Peshawar

Subject:- Appeal against the Order dated 25-03-2024, of the Superintendent of Police, Head Quarters, Peshawar, whereby the appellant has been removed from service.


4F-11-
Dated 23/4/2024

3020

Respectfully Submitted:-

That the appellant was enlisted as Special Police Officer (SPO) after the death of his brother namely Saeed Ullah who was serving as Special Police Officer (SPO) and later on Regularized w.e.f from 01-03-2020 along with others and since enlistment the appellant performed his duties with honesty and full Devotion to the entire satisfaction of his high ups. The appellant was transferred to District Khyber on 06-01-2021, where he regularly performed his duties and in the month of October, 2023 fact finding inquiry was initiated and the appellant along with others were brought to police Lines at about 10.00 P.M on leave days, i.e Saturday and Sunday where he was forced to sign a blank paper and was also directed to deposit his Service Book, Service Card, Check Book and ATM Card etc. which are still not returned to the appellant despite repeated requests. The salary of the appellant was subsequently stopped, after the mentioned preliminary inquiry on the allegations of ghost/illegal/Fake employees vide order dated 06-12-2023, and then the appellant was **removed from Police Record** vide Order dated 25-03-2024, which order is illegal and void ab-initio. The appellant was duly enlisted as (SPO) and later on regularized and he duly performed his duties. Thus the impugned order is not tenable. The appellant was not heard and ex-parte action has been issued against him in violation of the principles of natural justice. No Charge Sheet and Show Causes Notice were issued to the appellant nor was any regular inquiry conducted in the matter. There is no omission or commission on part of the appellant and the appellant could not be punished for the fault of others if any. Strangely the alleged Masterminds have been transferred only and no action has been taken against them, hence the impugned order smacks malice.

It is therefore requested that on acceptance of this appeal impugned Order dated 25-03-2024 may kindly be set aside and the appellant may kindly be ordered to be reinstated in service with all back benefits.


Inam Ullah, Ex Constable,
No.117, Capital City Police, Peshawar
R/O Ghareeb Abad Dalazak Road
Peshawar
Cell # 0310-9513620

Dated: 22/04/2024

ATT/STED

ENLISTMENT ORDER

In the light of Govt. of NWFP Home & TAS Department Peshawar order No. 2017-11/JHD/5-8/KC-09 dated 12.02.2010 & Finance Department letter No. 1/1/50-III/70/2009-2010 dated 04.02.2010, the following candidates are hereby appointed as Special Police Officers, on fixed pay of Rs.10000/- Per month w.e.f 25.04.2013. For PS Faqirabad subject to the medical fitness and final verification. The post shall automatically stand abolished on expiry of their contract period. The Services of these Special Police Officers can be terminated any time without assigning any reason.

5
-12-

S#	OAS I NO	NAME	FATHER NAME	ADDRESS	POST
1.	11	Taimur Jalal	Humayun Ali	Afghan colony eshrafia	Faqirabad
2.	18	Muhammed Sharif	Latif Khan	Mohallah Sardar Colony	Faqirabad
3.	149	Imtiaz Hussain	Nazir Hussain	Faqir Abad Bl 2 dalazak road	Faqirabad
4.	363	Asghar Ali	Muhammad Younas	Afghan colony	Faqirabad
5.	489	Zar Jan	Sajda Jan	Faqirabad No.02	Faqirabad
6.	666	Muhammed Nawab	Jehanzaib	Deen Bahar Colony	Faqirabad
7.	740	Zahid Khan	Jehanzeb Khan	Qazi Kaizy	Faqirabad
8.	857	Farman Shah	Rehman Shah	Qazi Abad	Faqirabad
9.	860	Siraj Ud din	Rehman ud Din	Mohallah Afghan Colony	Faqirabad
10.	909	Nasir Khan	Qamar Khan	Ashrafia Colony	Faqirabad
11.	1006	Sakhtiar	Shakir Ullah	Ashrafia Colony	Faqirabad
12.	1182	Sulif Ullah	Milan Khel Khan	Esaher Abad Main Road	Faqirabad
13.	1415	Mohib Ullah 1332	Starf Khan	Yousaf Abad Dalazak Road	Faqirabad
14.	1677	Abdul Hameed Khan	S. Arif	Patang Chook	Faqirabad
15.	1760	Ishaq Ahmad	Wali Muhammad	Ashrafia Colony Qazi abad	Faqirabad
16.	1766	Feroed Knari	Kabzi Khan	Mohallah Qazi Abad	Faqirabad
17.	1778	Wajid Reza	Raza Khan	Iliaq Street	Faqirabad
18.	1834	Iftikhar Ahmad	Muhammad Sardar	Mashnagar Street eshrafia colony	Faqirabad
19.	1912	Yasir Ali	Wasil Khan	Dalazak Road Qazi Kaizy	Faqirabad
20.	1978	Gul Zaman	Muhammad Rasool	D. Bahar Colony	Faqirabad
21.	2549	Wajid Ali	Gul Muhammad	Supply Gate S# 8 Mohallah Gashab Abad No.02	Faqirabad
1332	2575	Saeed uliah	Salf ud Din		

O.E No: 1634
Date: 7-5-2013

SUPERINTENDENT OF POLICE
CITY PESHAWAR
/2013.

NO. _____ /OSI, dated Peshawar th:

Copy to the :-

1. Superintendent of Police, City, Peshawar.
2. ASP/Faqirabad/SHO Faqirabad.
3. Pay Officer
4. CAC/FMC

ATTESTED

ENLISTMENT ORDER

In light of Govt: of NWFP Home & TAS Department Peshawar Order No SO(P)-II/HC/5-8/KC-09 dated 12/028/2010 & Finance Department letter No 7/1/BO-111/FD/2009-2010 dated 04/02/2010 the following candidates are hereby appointed as Special Police Officer, on the fixed pay of Rs. 10000/- per month w.e.f. 25/04/2013 for OS Faqir Abad subject to the medical fitness and verification. The post shall automatically stand abolished on expiry of their contract period. The services of these special police officers can be terminated any time without assigning any reason.

S. No	QASI No	Name	Father Nam	Address	
1)	11	Taimur Jalal	Humayun Ali	Afghan Colony	Faqir Abad
2)	18	Muhammad Sharif	Latif Khan	Mohallah Sardar Colony	Faqir Abad
3)	149	Imtiaz Hussian	Nazir Hussian	Faqir Abad	Faqir Abad
4)	363	Asghar Ali	Muhammad Younas	Afghan Coloy	Faqir Abad
5)	489	Zar Jan	Sajda Jan	Faqir Abad	Faqir Abad
6)	555	Muhammad Nawab	Jehanzeb	Deen Bahar Colony	Faqir Abad
7)	740	Zahid Khan	Jehanzeb Khan	Qazi Kalaly	Faqir Abad
8)	857	Farman Shah	Rahman Shah	Qazi Abad	Faqir Abad
9)	880	Siraj Ud Din	Rehman Ud Din	Mohallah Faqir Abad	Faqir Abad
10)	909	Nasir Khan	Qamar Khan	Afghan Colony	Faqir Abad
11)	1006	Bakhtiar	Shakir Ullah	Afghan Colony	Faqir Abad
12)	1182	Saif Ullah	Mian Khel Kan	Bashir Abad	Faqir Abad
13)	1416	Mohib Ullah	Stori Khan	Itehad Road	Faqir Abad
14)	1677	Abdul Hameed Khan	S. Arif	Yousaf Abad	Faqir Abad
15)	1760	Ishaq Ahmad	Wali Muhammad	Patang Chowk	Faqir Abad
16)	1766	Fareed Khan	Kabal Khan	Ashrafia Colony	Faqir Abad
17)	1778	Wajid Raza	Raza Khan	Mohallah Qazi Abad	Faqir Abad
18)	1834	Iftikhar Ahmad	Muhammad Sardar	Itefat Street	Faqir Abad
19)	1912	Yasir Ali	Wasil Khan	Hashtnagri	Faqir Abad
20)	1978	Gul Zaman	Muhammad Rasool	Dalazak Road	Faqir Abad
21)	2549	Wajid Ali	Gul Muhammad	Deen Barh Colony	Faqir Abad
22)	2575	Saeed Ullah	Saif Ud Din	Supply Gate St# 8	Faqir Abad

ATTESTED

"H"

920
22/04/19

-13-

ORDER

As per report of MASI PS Phandu vide D.D. No. 07 dated 17.04.2019, that SPO Saeed Ullah No.1342 of PS Phandu has died due to his natural death on 16.04.2019.

Therefore, his name is hereby struck off from Police record with effect from 16.04.2019.

[Signature]
SUPERINTENDENT OF POLICE,
HQRS: PESHAWAR.

OB NO. 1370

DATED. 18-4-2019.

No. S/SL-88 /OASI. dated Peshawar the 19 / 4 /2019.

Copy to the: -

- 1. Superintendent of Police City, Peshawar.
- 2. ASI, Gulbahaar/SHO PS-Phandu
- 3. Asst. Dir. Crim. J. Section CCP Peshawar.
- 4. Pev Officer/CRC/FMC
- 5. Machine Clothing Godown.

35/2019 (1370)
23/04/19
eff

SHO Phandu
For info. & action.

[Signature]
Asst. Gulbahaar
22-04-2019.

ATTESTED

Better Copy

Page No 13

Order

As per report of MASI PS Phandu vide D.D No 07 dated 17/04/2019 the SPO Saeed Ullah No 1342 of PS Phandu has died due to his natural death on 16/04/2019.

Therefore, his name is hereby struck off form the police record with effect from 16/04/2019

Superintendent of Police
HQRS Peshawar

ATTESTED

114

تعمیر 20 روز یا کچھ 23/19

مقامہ تعمیر

20 روزوں کے عمل میں 23/19 اور 23/19 کے وقت نہ صرف ڈالنے کے لیے
 آڈر کے بارے میں وضاحت کے لیے موصول ہوئی ہیں۔
 سعید اللہ 1342 تمام تصدیقوں کو موصول ہونے کے وقت موصول ہونے کو نام 03
 570
 1370
 18.4.19
 یہ لاہور میں تعمیرات کے لیے مقررہ ہے۔

تعمیرات کے لیے

17/11/19

23-4-19



23-4-19

TESTED

-15-

VAKALATNAMA
BEFORE THE KHYBER PAKHYUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No 12024

Inam ullah

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Police Deptt

(RESPONDENT)
(DEFENDANT)

I/We Inam ullah

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme 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 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. / / 202


CLIENT

ACCEPTED

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**


WALEED ADNAN

UMAR FAROOQ MOHMAND


MAHMOOD JAN

&


**ABID ALI SHAH
ADVOCATES**


OFFICE:

Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)

FORM OF ORDER SHEET

Court of _____

Appeal No. 1217/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/08/2024	<p>The appeal of Mr. Inamullah resubmitted today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 20.08.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>