


FORM OF ORDER SHEET

Court of _____

Appeal No. 1563/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/09/2024	<p>The appeal of Mr. Liaqat Ali received today by registered post through Muhammad Aslam Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on 21.10.2024. Counsel for the appellant has been informed telephonically.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

A- NO. 1563/2024

Liaqat Khat Head Constable No.682, District Police Haripur(Appellant)

VERSUS

1. District Police Officer, Haripur
2. Regional Police Officer, Hazara Region, Abbottabad.

..... (Respondents)

SERVICE APPEAL

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APPELLANT

THROUGH

(MUHAMMAD ASLAM TANOLI)
ADVOCATE HIGH COURT
ABBOTTABAD

Dated: 09-2024

①

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Appeal No.....15637/2024

Liaqat Khal Head Constable No.682, District Police Haripur(Appellant)

VERSUS

1. District Police Officer Haripur.
2. Regional Police Officer, Hazara Region, Abbottabad.

(Respondents)

**SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL ACT
1974 AGAINST ORDER DATED 14-06-2024 OF THE DISTRICT POLICE
OFFICER HARIPUR WHEREBY APPELLANT HAS BEEN AWARDED
PUNISHMENT OF 'FORFEITURE OF 02 YEARS APPROVED SERVICE' AND
ORDER DATED 22-08-2024 OF REGIONAL POLICE OFFICER HAZARA
REGION ABBOTTABAD WHEREBY APPELLANT'S DEPARTMENTAL
APPEAL FILED/REJECTED.**

**PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL BOTH THE
ORDERS DATED 14-06-2024 AND 22-08-2024 OF THE RESPONDENTS
MAY GRACIOUSLY BE SET ASIDE AND APPELLANT BE RESTORED HIS
FORFEITED 02(TWO) YEARS APPROVED SERVICE WITH GRANT OF ALL
CONSEQUENTIAL SERVICE BACK BENEFITS.**

Respectfully Sheweth:

1. That appellant while posted as MHC Police Station JIP (District Haripur) was served with a Show Cause Notice dated 30-05-2024 which was replied in detail explaining all facts of the matter and denying the allegations mentioned therein being incorrect and baseless. (Copies of Show Cause Notice and its reply are attached as Annexure-"A&B").

2. That the allegations against appellant as mentioned in the Show Cause Notice are that " ***It has been complained by Adil that there was land dispute between Akhtar Nawaz and the applicant but you did not cooperative with him in cross report vide case FIR No.188 dated 20-05-2024 u/s-506/337-AI PS TIP. This shows your lack of interest in the discharge of official duties which amounts to gross misconduct on your part in terms of KPK Police Efficiency & Discipline Rules 1975***".
3. That allegation as leveled in the SCN as well as in the punishment order dated 14-06-2024 is incorrect and baseless having no nexus with reality. Appellant has discharged his assigned duties with devotion and honesty. Appellant remained posted as MHC PS TIP Haripur for about only about 03 months. During his period there was not a single complaint against him from public as well as from departmental authorities.
4. That in fact there was a dispute over property between the parties i.e. Complainant Adil Khan etc and Dr. Akhtar Nawaz Khan etc. Dr. Akhtar Nawaz made his appearance in PS TIP and reported his injuries against Adil etc which was recorded vide Daily Dairy No. 26 dated 11-05-2024. Subsequently Adil Khan appeared and made a complaint against Dr. Akhtar Nawaz Khan etc which was also recorded vide daily dairy No. 27 dated 11-05-2024. Both the reports were handed over to Shoukat Zaman ASHO PS TIP for further legal proceedings. On 12-05-2024 Adil Khan Jadoon after getting Bail submitted

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application against Dr. Akhtar Nawaz Khan etc for raising his wall to the ground and of making illegal possession which was handed over to Shoukat Zaman ASHO vide order No. 434-SM/TIP. Then on 30-05-2024 Shoukat Zaman ASHO reported vide Daily Dairy No. 26 dated 11-05-2024 a case u/s-506-337AI had made out then an FIR No.188 dated 30-05-2024 u/s-506-337AI PPC at Police Station TIP was registered and handed to Shoukat Zaman ASHO for further proceeding. **(Copies of Daily Dairy No.26 dated 11-05-2024 and FIR No.188 dated 30-05-2024 are attached as Annexure-"C & C-1").**

5. That appellant being MHC recorded both the daily dairies and FIR No.188 dated 30-05-2024 and handed these over to Shoukat Zaman ASHO TIP for necessary proceedings. Appellant has done his duties according to law, rules and regulations and committed no fault on his part. All the facts of the case were immediately brought to notice of the seniors well in-time but still the appellant has been penalized without reason and justification.
6. That appellant being a MHC has done what he could do under the law. After recording daily dairies and FIR, he had handed these papers over well in time to the ASHO of the Police Station for further proceedings. Complaint of Adil Khan is based on false and fabricated allegations.
7. That no proper departmental inquiry was conducted. Neither Charge Sheet, nor inquiry report,

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if any, was issued to appellant. Even opportunity of personal hearing was not provided to him and he was awarded punishment of "forfeiture of two year of approved service" vide order dated 14-06-2024 in utter violation of law, departmental rules & regulations, facts and principle of natural justice. **(Copy of Order dated 14-06-2024 is attached as Annexure-"D").**

8. That appellant has rendered about 19 years service in the police department. He always performed his assigned duties with devotion, dedication and honesty to the entire satisfaction of his officers and never provided a chance of reprimand. On occasions appellant has been awarded with commendation certificates and cash rewarded by police high-ups for his tremendous services. Appellant has meritorious service record at his credit.
9. That appellant is totally innocent. He has discharged his duties with care and caution and committed no fault on his part. Complaint of Adil etc is totally incorrect and against the facts, Adil had tried to bring unnecessary pressure upon the appellant to get un-due favour. Therefore, the allegation as attributed to the appellant in the Show Cause Notice as well as punishment order are incorrect and against the facts.
10. That proper inquiry was not conducted. Charge Sheet was not issued. No witness was produced before the inquiry officer to depose against

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appellant. Copy of inquiry report, if any, was not provided to the appellant. Even opportunity of personal hearing was not provided. Appellant was condemned unheard in serious violation of departmental rules, regulation and principle of natural justice.

11. That appellant aggrieved of punishment order passed by the DPO Haripur filed a departmental appeal before the Regional Police Officer, Hazara Region, Abbottabad which was filed/rejected vide order dated 22-08-2024. **(Copies of departmental appeal and its rejection order dated 22-08-2024 are attached as Annexure-"E & F").**
12. Hence instant service appeal inter alia on the following as well as other grounds:

GROUND:-

- A) That both the orders dated 14-06-2024 and 22-08-2024 of the respondents are illegal, unlawful against the facts, departmental rules, regulations and principle of natural justice hence liable to be set aside.
- B) That proper inquiry was not conducted. No Charge Sheet was issued. No witness was produced before the inquiry officer to depose against appellant in his presence. Copy of inquiry report, if any, was not provided. Even opportunity of personal hearing was not afforded. Nothing adverse could be brought on record against appellant. Appellant was condemned unheard in serious violation of departmental rules, regulations and principle of natural justice.

- C) That respondents have not treated the appellant in accordance with law, departmental rules, regulations and policy on the subject and have acted in violation of Article-4 of the constitution of Islamic Republic of Pakistan 1973 and unlawfully issued the impugned orders which are unjust, unfair hence not sustainable in the eyes of law.
- D) That appellate authority has failed to abide by the law and even did not take into consideration the grounds adduced in the memo of appeal and has rejected the departmental appeal without any speaking order. Thus act of respondent is contrary to the law as laid down in the KPK Police Rules 1934 read with section 24-A of General Clauses Act 1897 and Article-10 of the Constitution of Islamic Republic of Pakistan 1973.
- E) That the allegations leveled against appellant are incorrect, false, fabricated and are the result of malafide. Appellant never involved himself in any such activity as alleged against him. He is innocent and there is nothing wrong on his part.
- F) That instant service appeal is well within time and this honorable Service Tribunal has got every jurisdiction to entertain and adjudicate upon the lis.

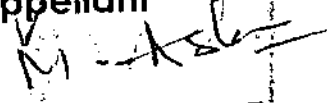
PRAYER:

It is, therefore, humbly prayed that on acceptance of instant service appeal both the orders dated 14-06-2024 and 22-08-2024 of the respondents may graciously be set aside and appellant be restored his forfeited 02 years approved service with grant of all consequential service back benefits. Any other relief which in the

(7)

circumstances of the case this honorable Tribunal deems fit may also be granted.

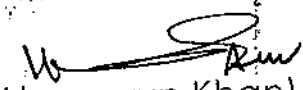
Appellant



Through

(Muhammad Aslam Tanoli)
Advocate High Court
Abbottabad

And



(Hamayun Khan)
Advocate High Court
Abbottabad

Dated: -09-2024

VERIFICATION

It is verified that contents of instant service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Dated: -09-2024

Appellant



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BEFORE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Liaqat Khan Head Constable No.682, District Police Haripur (Appellant)

VERSUS

- 1. District Police Officer, Haripur
- 2. Regional Police Officer, Hazara Region, Abbottabad.

..... (Respondents)

SERVICE APPEAL

AFFIDAVIT

I, Liaqat Khan, appellant do hereby solemnly declare and affirm on oath that contents of instant service appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honorable Tribunal.

Dated: -09-2024

[Handwritten Signature]

Deponent/Appellant

Identified By:

M. Aslam Tanoli 14/9/24

(Muhammad Aslam Tanoli)
Advocate High Court
ABBOTTABAD

Dated: -09-2024

[Handwritten Signature]

Appellant

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BEFORE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Liaqat Khat Head Constable No.682, District Police Haripur(Appellant)

VERSUS

1. District Police Officer, Haripur
2. Regional Police Officer, Hazara Region, Abbottabad.

..... (Respondents)

SERVICE APPEAL

CERTIFICATE

It is certified that no such appeal prior to this one on the subject has ever been filed in this Honorable Service Tribunal or any other court.

Dated: -09-2021


Appellant

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Annex - 'A'



DISTRICT POLICE OFFICER
HARIPUR

☎ 0995-920100/01, 📠: 0995614714, ✉: dpoharipur1@gmail.com

No. 203 /PS

dated Haripur the 30 /05/2024

SHOW CAUSE NOTICE

That you FC Liaquat Khan No.682 while posted as MHC PS TIP have rendered yourself liable to be proceeded under Rules 5 (3) of the Khyber Pakhtunkhwa, Police Efficiency & Discipline Rules 1975 (Amended 2014) for the following misconduct:-

"It has been complained by Adil that there was land dispute between Akhtar Nawaz and the applicant but you did not cooperative with him in cross report vide case FIR No.188 dated 20.05.2024 w/s 506/337/AF PS TIP. This shows your lack of interest in the discharge of official duties, which amounts to gross misconduct on your part in terms of KPK Police Efficiency & Discipline Rules 1975" (amended 2014)".

1. That by reason of above, sufficient material is placed before the undersigned; therefore, it is decided to proceed against your in general Police proceedings without aid of enquiry officer.
2. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
3. That your retention in the Police force will amount to encourage inefficient and unbecoming of good Police Officers.
4. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the rules.
5. Your, therefore called upon to show cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa, Police Efficiency & Discipline Rules 1975 (Amended 2014) for the misconduct referred above.
6. You should submit a reply to this show cause notice within 07 days of the receipt of this notice, failing which an ex-parte action shall be taken against you.
7. You are further directed to inform the undersigned whether you wish to be heard in person or not.

Received by _____
Dated: /05/2024

District Police Officer,
Haripur

Attested

11-5-2011

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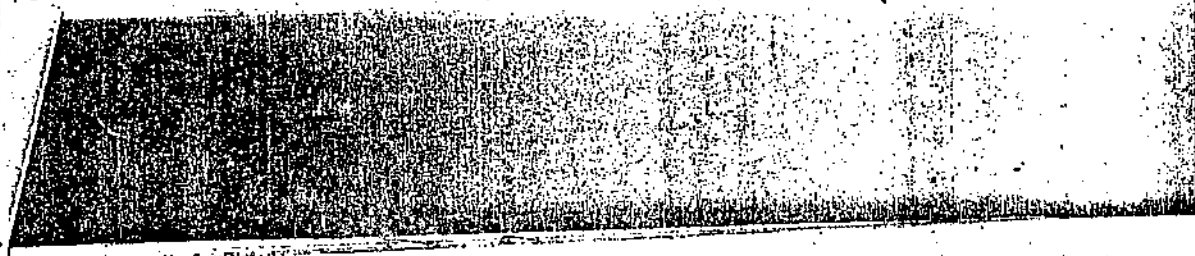
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Main body of handwritten text, likely a list or report, written in a cursive script.

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Vertical handwritten text on the left side of the page, possibly a list or index.

Large handwritten signature or name, possibly 'Atwood', written in a cursive script.

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506/337A5

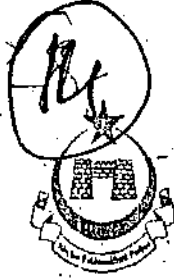
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Annex D

**DISTRICT POLICE OFFICER
HARIPUR**

☎ 0995-920100/01, 📠: 0995614714, ✉: dpoharipur1@gmail.com

ORDER

HC Liaquat Khan No.682, while posted as MHC PS TIP, it was complained by Adil that there was land dispute between Akhtar Nawaz and the applicant but delinquent official did not cooperative with him in cross report vide case FIR No.188 dated 20.05.2024 u/s 506/337/ AI PS TIP. This shows his lack of interest in the discharge of official duties, which amounts to misconduct on his part in terms of the KPK Police Efficiency & Discipline Rules 1975 (amended 2014).

Consequently, delinquent official was served with the SCN vide this office issue No.203/PS dated 30.05.2024, he was also called in OR and heard in person but he could not give any plausible justification in his defense. Therefore, he is awarded minor Punishment of "Forfeiture of Two Years Approved Service" with immediate effect.

OB No. 450
Dated 14-6-2024

Suleman Zaffar. (PSP)
District Police Officer,
Haripur

Attested

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82
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Annex-E

BEFORE THE REGIONAL POLICE OFFICER HAZARA REGION
ABBOTTABAD

(Departmental Appeal by HC Uzaqat Khan No. 882, District Police Haripur)

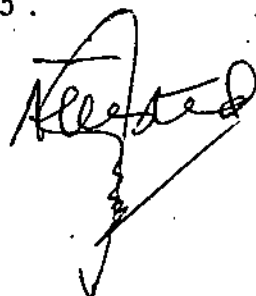
DEPARTMENTAL APPEAL AGAINST ORDER OB NO. 450 DATED 14-06-2024 PASSED BY THE DISTRICT POLICE OFFICER HARIPUR WHEREBY APPELLANT HAS BEEN AWARDED WITH PUNISHMENT OF "FORFEITURE OF TWO (02) APPROVED SERVICE".

PRAYER: ON ACCEPTANCE OF INSTANT DEPARTMENTAL APPEAL ORDER DATED 14-06-2024 MAY KINDLY BE SET ASIDE AND APPELLANT BE RESTORED HIS TWO (02) YEARS FORFEITED APPROVED SERVICE FROM THE DATE OF ITS FORFEITURE WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.

Respected Sir,

With most reverence the following few lines are submitted for your kind consideration and favorable orders:-

1. That appellant while posted as MHC Police Station TIP (District Haripur) was issued with a Show Cause Notice dated 30-05-2024 which was replied in detail explaining all facts of the matter and denying the allegations mentioned therein being incorrect and baseless. (Copies of Show Cause Notice and its reply are attached as "A&B").
2. That the allegations against appellant as mentioned in the Show Cause Notice are that "It has been complained by Adil that there was land dispute between Akhtar Nawaz and the applicant but you did not cooperative with him in cross report vide case FIR No.188 dated 20-05-2024 u/s-506/337-AI PS TIP. This shows your lack of interest in the discharge of official duties which amounts to gross misconduct on your part in terms of KPK Police Efficiency & Discipline Rules 1975".



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3. That allegation as leveled in the SCN as well as in the punishment order dated 14-06-2024 is incorrect and baseless having no nexus with reality. Appellant has discharged his assigned duties with devotion and honesty. Appellant remained posted as MHC PS TIP Haripur for about only about 03 months. During this period there was not a single complaint against him from public.

4. That in fact there was a dispute over property between the parties comprising on Complainant Adil Khan etc and Dr. Akhtar Nawaz Khan etc. Dr. Akhtar Nawaz made his appearance in PS TIP and reported his injuries against Adil etc which was recorded vide Daily Dairy No. 26 dated 11-05-2025. Subsequently Adil Khan appeared and made a complaint against Dr. Akhtar Nawaz Khan etc which was recorded vide daily dairy No. 27 dated 11-05-2024. Both the reports were handed over to Shoukat Zaman ASHO PS TIP for further proceedings. On 12-05-2024 Adil Khan Jadoon after getting Bail u/s-107/151 submitted application against Dr. Akhtar Nawaz Khan etc for raising wall to the ground and of making illegal possession which was handed over to Shoukat Zaman ASHO vide order No. 434-SM/TIP. Then on 30-05-2024 Shoukat Zaman ASHO reported that in Daily Dairy No. 26 dated 11-05-2024 a case u/s-506-337AI had made out then FIR No.188 dated 30-05-2024 u/s-506-337AI PPC Police Station TIP was registered and handed to Shoukat Zaman ASHO for further

Attested

(B)

proceeding. (Copy of FIR No.188 dated 30-05-2024 is attached as "C").

5. That appellant being MHC recorded both the daily dairies and FIR No.188 dated 30-05-2024 and handed over to Shoukat Zaman ASHO TIP for necessary proceedings. Appellant has done his duties according to law, rules and regulations and committed no fault on his part. All the facts of the case were immediately brought to notice of the officers' well in-time but still I have been penalized without reason and rhyme.
6. That appellant being a MHC has done what he could do under the law. After recording daily dairies and FIR, he has handed these papers well in time to the ASHO of the Police Station for further proceedings. Complaint of Adil Khan is based on false and fabricated allegations.
7. That no proper departmental inquiry was conducted. Neither Charge Sheet, nor inquiry report, if any, was issued to appellant. Even opportunity of personal hearing was not provided to appellant and he was awarded punishment of "forfeiture of two year of approved service" vide order dated 14-06-2024 in serious violation of law, departmental rules & regulations, facts and principle of natural justice. (Order dated 14-06-2024 is attached as "D").
8. That appellant has rendered about 19 years service in the police department. He always performed his

Accepted

4. (18)

assigned duties with devotion, dedication and honesty to the entire satisfaction of his officers and never provided a chance of reprimand. On occasion appellant has been awarded with commendation certificates and cash rewarded by police high-ups for his tremendous services. Appellant has meritorious service record at his credit.

9. That appellant is totally innocent. He has discharged his duties with care and caution and committed no fault on his part. Complaint of Adil etc is totally incorrect and against the facts, Adil tried to bring unnecessary pressure upon the appellant to get undue favour. Therefore, the allegations as attributed to the appellant in the Show Cause Notice as well as punishment order are incorrect and against the facts which are vehemently denied.

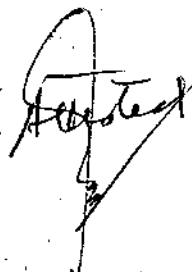
10. That if the appellant is provided with a chance of personal hearing, he will really prove himself as innocent by explaining all the facts of the matter.

In view of the aforementioned facts it is earnestly requested that order dated 14-06-2024 of the District Police Officer, Haripur may kindly be set aside and the appellant be restored his forfeited 02 (two) years approved service from the date of its forfeiture with all consequential service back benefits. Appellant shall pray for your good health and long life.

Yours Obedient Servant

(HC Liaqat Khan No. 682)
District Police Haripur

Dated: 25-07-2024





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Annex F

OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

☎ 0992-9310021-22

☎ 0992-9310023

✉ r.pohazara@gmail.com

NO: 4460 /PA DATED: 22/08/2024

ORDER

This order will dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by HC Liaqat Khan No. 682 of district Haripur against the order of punishment i.e. forfeiture of two years approved service awarded by DPO, Haripur vide OB No. 450 dated 14-06-2024.

"Brief facts leading to the punishment are that the appellant while posted as MHC PS TIP, it was complained by Adil that there was land dispute between Akhtar Nawaz and the applicant but delinquent official did not cooperate with him in cross report vide case FIR No. 188 dated 20-05-2024 u/s/506/337/ AI PS TIP. This shows his lack of interest in the discharge of official duties."

The appellant was issued show cause notice and heard in person. However, he failed to advance any cogent justification in his defense. Consequently, DPO Haripur awarded him minor punishment of forfeiture of two years approved service. Hence, the appellant submitted this present appeal.

After receiving his appeal, comments of DPO, Haripur were sought and examined/perused. The undersigned called the appellant in Orderly Room and heard him in person and provided him reasonable opportunity to defend the charges leveled against him. However, he failed to advance any convincing justification in his defense. Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 the instant appeal is hereby *rejected/filed* with immediate effect.

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

No. 4461 /PA, dated Abbottabad the 22-8-2024.

Cc.

District Police Officer, Haripur for information and necessary action with reference to his office Memo No. 4852 dated 12-08-2024. Fuji missal containing enquiry file of the appellant are returned herewith for office record.



وکالت نامہ

بعدالت جناب پیسٹر کنوینشنل ایڈووکیٹس اور پیسٹر بیرونی لینڈس
منجانب ایس ایم ڈیٹ

میا قتیح خان
ڈی آئی جی / (RPo) لہذا روٹن وکس
دعویٰ یا جرم سرسین زینیل باعث تحریر آنکہ

مندرجہ بالا عنوان میں اپنی طرف سے بیرونی وجود ہی مقام
کدر ایس ایم کنوینشنل ایڈووکیٹس اور پیسٹر بیرونی لینڈس
رو برو عدالت حاضر ہوتا ہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی
پیشی پر مظہر حاضر نہ ہوا۔ اور حاضری کی وجہ سے کسی وجہ پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ
ہونگے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ یا کچہری کے مقرر اوقات سے پہلے یا بروز
تعطیل بیرونی کرنے کے مجاز نہ ہونگے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ سماعت ہونے یا بروز کچہری کے اوقات
کے آگیا یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے رابطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے
بھی صاحب موصوف ذمہ دار نہ ہونگے۔ مجھے کل ساختہ پرواختہ صاحب مثل کردہ ذات خود منظور و قبول ہوگا اور صاحب
موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق
کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور واپس کرنے
کا ہر قسم کا بیان دینے اور سپرد و نمائندگی و رضی نامہ و فیصلہ بر خلاف کرنے اقبال و عوے کا اختیار ہوگا۔ اور بصورت اپیل و
برآمدگی مقدمہ یا منسوخی ڈگری یا کٹرفر درخواست حکم انٹائی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو
بشرط ادائیگی علیحدہ بیرونی مختار نامہ کرنا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر
کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہونگے جیسے صاحب
موصوف کو۔ پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ
کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ سند ہے مضمون
مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

Accepted by
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