


FORM OF ORDER SHEET

Court of _____

Appeal No. 1460/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/09/2024	<p>The appeal of Mr. Khan Wada re-submitted today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 25.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Khan Wada received today i.e on 29.08.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- The authority whose order is challenged has not been made a necessary party.
- 2- Departmental appeal having no date be dated.

No. 748 /Inst./2024/KPST,

Dt. 12/9 /2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

~~H. Taimur Ali~~ Adv.
Taimur Ali
High Court at Peshawar.

Respected Sir,

- 1- Removed as the appellant made parties from the respondent.
- 2- Removed

Resubmitted after compliance.


16/9/2024.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 146 /2024

Khan Wada

VS


Police Department

INDEX

S.No.	Documents	Annexure	P. No.
1	Memo of Appeal	-----	02-05
2	Affidavit	-----	06
3	Copy of memo/letter dated 22.02.2020	A	07-08
4	Copies of charge sheet, memo/letter dated 27.06.2022 and order dated 21.07.2022	B,C&D	09-13
5	Copies of order dated 28.07.2022 and order dated 14.09.2022.	E&F	14-16
6	Copy of judgment dated 14.09.2023	G	17-21
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THROUGH:

APPELLANT


TAIMUR ALI KHAN
(ADVOCATE HIGH COURT)
Cell# 0333-9390916

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 1460 /2024

Khan Wada, Head Constable,
PP, Bannu Gate, Police Station, Cantt, Kohat

(APPELLANT)

VERSUS

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Regional Police Officer, Kohat Region, Kohat.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE IMPUGNED ACTION OF THE RESPONDENTS OF NOT PROMOTING THE APPELLANT TO THE RANK OF OFFICIATING ASSISTANT SUB INSPECTOR (BPS-09) WITH EFFECT FROM 21.07.2022, I.E THE DATE WHEN HIS COLLEAGUES AND JUNIORS WERE PROMOTED TO THE RANK OF OFFICIATING ASSISTANT SUB INSPECTOR (BPS-09) AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE RESPONDENTS MAY KINDLY BE DIRECTED TO CONSIDER THE APPELLANT FOR PROMOTION TO THE RANK OF OFFICIATING ASSISTANT SUB INSPECTOR (BPS-09) WITH EFFECT FROM 21.07.2022, I.E THE DATE WHEN HIS COLLEAGUES AND JUNIORS WERE PROMOTED TO THE RANK OF OFFICIATING ASSISTANT SUB INSPECTOR (BPS-09) WITH ALL BACK BENEFITS. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO, BE AWARDED IN FAVOUR OF APPELLANT.

ESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was appointed in the police department as Constable and after completing his due training and courses he was promoted the rank of Head Constable in the year 2016 and since his appointment the appellant is performing her duty with devotion and honesty, whatsoever, assigned to him and no complaint has been filed regarding his performance by his high ups.
2. That respondent No.2 through memo dated 22.02.2020 informed all the concerned authorities to provide service record, full service record on enclosed proforma completed in all aspects and no pending Departmental Enquiry Certificates in respect of IHCs (mentioned in the memo/letter) of your respective district/units in connection with their promotion to the rank of officiating ASIs in which the name of the appellant was also included. **(Copy of memo/letter dated 22.02.2020 is attached as Annexure-A)**
3. That the appellant while serving the said capacity, charge sheet was issued to him on 26.05.2022 on some baseless allegations and during the pendency of inquiry proceeding against the appellant, respondent No.2 through memo/letter dated 27.06.2022 informed all the concerned authorities to direct IHCs (mentioned in memo/letter) of your respective districts/units to appear in DPC meeting scheduled to be held on 29.06.2022 in connection with their promotion to the rank of Officiating ASIs in which the name of the appellant was also present and on the recommendation of that DPC 47 IHCs were promoted to the rank of Officiating ASIs vide order dated 21.07.2022, however, the name of the appellant was not present in the promotion order dated 21.07.2022. **(Copies of charge sheet, memo/letter dated 27.06.2022 and order dated 21.07.2022 are attached as Annexure-B,C&D)**
4. That without conducting proper and regular inquiry against the appellant to the dig out the reality about the allegations, the appellant was compulsorily retired from service vide order dated 28.07.2022 and his departmental appeal against the order dated 28.07.2022 was also rejected on 14.09.2022. **(Copies of order dated 28.07.2022 and order dated 14.09.2022 are attached as Annexure-E&F)**
5. That the appellant challenged the orders dated 28.07.2022 and 14.09.2022 in this Honorable Service Tribunal in service appeal No.1468/2022. The Honorable Service Tribunal heard and decided the appeal of the appellant on 14.09.2023. The Honorable Service Tribunal accepted the appeal of the appellant, set aside the orders dated 28.07.2022 and dated 14.09.2022 and reinstated the appellant

in service with all back benefits. (Copy of judgment dated 14.09.2023 is attached as Annexure-G)

6. That in the compliance of judgment dated 14.09.2023 of this Service Tribunal, the appellant was reinstated into service vide order dated 14.12.2023 and as the appellant was reinstated by this Service Tribunal with all back benefits and as such the appellant is entitle to be promoted to the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 i.e the date when his colleagues and juniors were promoted to the rank of officiating Assistant Sub Inspector (BPS-09), therefore, the appellant filed departmental appeal on 15.05.2024 for promotion to the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 i.e the date when his colleagues and juniors were promoted to the rank of officiating Assistant Sub Inspector (BPS-09) and the appellant was deprived from promotion, which was not respondent with in the statutory period of ninety days. (Copies of order dated 14.12.2023 and departmental appeal are attached as Annexure-H&I)
7. That the appellant has no other remedy except to file the instant appeal in this Honorable Service Tribunal for redressal of his grievance on the following grounds amongst others.

GROUNDS:

- A) That not promoting the appellant in the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 along with his colleagues and juniors and not deciding his departmental appeal within the statutory period of ninety days are against the law, rules principle of natural justice and fair play.
- B) That the appellant was eligible for promotion to the rank of officiating Assistant Sub Inspector (BPS-09) at the time of DPC scheduled on 29.06.2022 for promotion to the rank of Officiating ASIs and his name was also send to in that DPC for promotion to the rank of Officiating ASIs in the memo/letter dated 27.06.2022 and the basis of that DPC, 47 IHCs were promoted to the rank of Officiating ASIs vide order dated 21.07.2022, however, the appellant was not promoted in the promotion order dated 21.07.2022 along with his colleagues and juniors without giving any reason of not promoting in the order dated 21.07.2022, which is against the norms of justice and fair play.
- C) That the name of the appellant was sent to DPC scheduled on 29.06.2022 and at the time of promotion on 21.07.2022, the appellant was serving in the department, therefore, it was his legal to be promoted to the rank of officiating ASI along with his

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colleagues and juniors in the order dated 21.07.2022, but the respondent department not promoted the appellant in order dated 21.07.2022 without giving any reason.

- D) That if the appellant was not considered in the DPC and was not promoted to the rank of ASI on 21.07.2022 due to reason of pending inquiry against the him then the respondent department violated the Superior Courts judgments as per Superior Courts judgments no one can be deprived from his legal right of promotion due to pending inquiry against him.
- E) That if the appellant was not considered in DPC and was not promoted to the rank of officiating ASI on 21.07.2022 due to baseless allegations and pending inquiry against him and later on the appellant was compulsory retired from service on 28.07.2022 on that baseless allegations, but that dismissal order dated 28.07.2022 was set aside by this Honorable Service Tribunal in its judgment dated 14.09.2023 and the appellant was reinstated into his service with all back benefits, which means that there remain no ground to deprive the appellant from his legal right of promotion to the rank of officiating ASI (BPS-09) along with his colleagues and juniors who were promoted to the rank of officiating ASI (BPS-09) on 21.07.2022.
- F) That if the appellant was not considered in DPC and was not promoted to the rank of officiating ASI on 21.07.2022 due to baseless allegations and pending inquiry against him and later on the appellant was compulsory retired from service on 28.07.2022 on that baseless allegations, but that dismissal order dated 28.07.2022 was set aside by this Honorable Service Tribunal in its judgment dated 14.09.2023 and the appellant was reinstated into his service with all back benefits, which means that the appellant was in the same position as was before the penalty order dated 28.07.2022 and it is the legal right of the appellant to be promoted to the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 i.e the date when his colleagues and juniors were promoted to the rank of officiating Assistant Sub Inspector (BPS-09).
- G) That if the appellant was not promoted due to the reason of baseless allegations and pending inquiry against him and later on he was also compulsory retired from service on 28.07.2022 on that baseless allegations, but that dismissal order dated 28.07.2022 was set aside by this Honorable Service Tribunal in its judgment dated 14.09.2023 and the appellant was reinstated into his service with all back benefits and as per Apex Court judgment that when an official was dismissed/removed or compulsory retired from service and then reinstated into service after not proving allegations

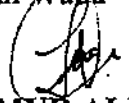
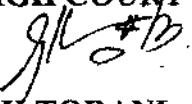
against him, then such official is entitle for all back benefits including promotion and as such the appellant is entitle to be promoted to the rank of officiating ASI w.e.f 21.07.2022 i.e the date when his colleagues and juniors were promoted.

- H) That not promoting the appellant to the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 along with his colleagues and juniors will effect his further promotion which will cause irreparable loss to the appellant in the shape of pension and other monetary benefits for no fault on his part.
- I) That the appellant has not been treated in accordance with law and rules and has been kept deprived from his legal right of promotion to the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 along with his colleagues and juniors.
- J) That the appellant seeks permission of this Honorable Tribunal to advance other grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that on the acceptance of this appeal, the respondents may kindly be directed to consider the appellant for promotion to the rank of Officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022, i.e the date when his colleagues and juniors were promoted to the rank of Officiating Assistant Sub Inspector (BPS-09) with all back benefits. any other remedy, which this Honorable Tribunal deems fit and appropriate that, may also, be awarded in favour of appellant

THROUGH:


APPELLANT
Khan Wada


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT
& 
SHAKIR ULLAH TORANI
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. _____/2024

Khan Wada

VS

Police Department

AFFIDAVIT

I, Khan Wada, Head Constable, PP, Bannu Gate, Police Station, Cantt, Kohat, (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

Phone No 9260112
Fax No 9260114

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- From: The Regional Police Officer,
Kohat Region, Kohat.
- To:
1. The Deputy Inspector General of Police,
CTD, Khyber Pakhtunkhwa,
Peshawar.
 2. The Deputy Inspector General of Police,
Motorway Police & NHMP,
Islamabad.
 3. The Commandant,
Police Training College, Hangu.
 4. The Deputy Inspector General of Police,
Special Branch, Khyber Pakhtunkhwa,
Peshawar.
 5. The District Police Officers, Kohat, Karak, Orakzai & Hangu.
 6. The Supdt: of Investigation wing, Kohat, Karak and Hangu.
 7. The Director,
Police Training School, Kohat

No. 1631-01 /EC. Dated Kohat the 29 /12 /2020.

Subject: - **DPC REGARDING PROMOTION AS OFFG: ASI.**

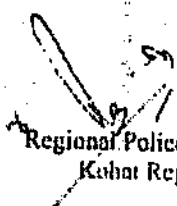
MEMO:

Please provide service record, full service particular on the enclosed proforma completed in all aspects and No pending Departmental Enquiry Certificates in respect of following IHCs of your respective districts / units in connection with their promotion to the next rank of Offg: ASIs:-

S.No.	Rank & Name	Present Posting
1.	IHC Sohail Kamal No. 186	Distt: Kohat
2.	IHC Shaheed-ur-Rehman No. 475	Distt: Karak
3.	IHC Fazal Subhan No. 124	Distt: Karak
4.	IHC Ghulam Shafiq 164	Distt: Karak
5.	IHC Jaffar Khan 445	Distt: Kohat
6.	IHC Haziq Ur Rehman 649/841	Distt: Karak
7.	IHC Muhammad Hanif 33	Distt: Hangu
8.	IHC Fazal Wahab 240	FRP Karak
9.	IHC Khan Wada 550	Distt: Kohat
10.	IHC Ayaz Ali 80	Distt: Kohat
11.	IHC Muhammad Naseer 248	Distt: Karak
12.	IHC Syed Naair Hussain 309	Investigation Hangu
13.	IHC Arab Ahmed 744/520	Distt: Kohat
14.	IHC Muhammad Farooq 235	Distt: Karak
15.	IHC Adil Hussain 322	Distt: Orakzai
16.	IHC Muhammad Ance 375	Distt: Karak
17.	IHC Miraj Muhammad Khan 326	Distt: Karak
18.	IHC Lal Majeed 790	Invest: Kohat
19.	IHC Rauf Khan 595/08	Distt: Kohat
20.	IHC Muhammad Hayat 870/222	Distt: Kohat
21.	IHC Eln Ud Din 136/1393	Distt: Kohat
22.	IHC Muhammad Iqbal 143	Distt: Kohat
23.	IHC Tanveer Ali 13	Investigation Hangu
24.	IHC Tolet Mehmood 18	PTS Kohat

26.	IHC Muhammad Ali Kazmi 1195	PTC Hangu
27.	IHC Aurangzeb 33/351	Distt: Kohat
28.	IHC Ihsan Ullah 159/412	Distt: Hangu
29.	IHC Asif Hussain 1125/651	Special Branch
30.	IHC Nighat Ali Shah 107/18	Invest: Kohat
31.	IHC Muhammad Arif Khan 302	Distt: Karak
32.	IHC Jan Muhammad 463	BDU
33.	IHC Muhammad Anwar 78	Distt: Hangu
34.	IHC Jehanzeb 1224	Distt: Kohat
35.	IHC Haider Abbas 260	Distt: Hangu
36.	IHC Muzhar Hussain 1095	Investigation Kohat
37.	IHC Asghar Hussain 331	Investigation Kohat
38.	IHC Naimat Ullah 758	Distt: Karak
39.	IHC Syed Mati Ullah Shah 366	PTC Hangu
40.	IHC Raziq Khan 264	Distt: Karak
41.	IHC Zarwali Khan 808	Distt: Kohat
42.	IHC Dilsoz Ahmed 20	CTD
43.	IHC Said Ullah 524	Distt: Kohat
44.	IHC Arab Jan 233	Invest: Kohat
45.	IHC Waseem Abbas 179	NHMP
46.	IHC Ghulam Ghufan 321	Distt: Hangu
47.	IHC Dilfaraz 181	Distt: Karak
48.	IHC Muhammad Imran 139	Invest: Kohat
49.	IHC Muhammad Shosib 845	Distt: Kohat
50.	IHC Muhammad Wajid 216	Distt: Karak
51.	IHC Muhammad Ilyas 196	Distt: Kohat
52.	IHC Eid Manoor 125	Distt: Hangu
53.	IHC Inayat Ullah 101	Distt: Kohat
54.	IHC Muhammad Suleman 781/22/826	Distt: Kohat
55.	IHC Syed Wajahat Hussain 296	CTD
56.	IHC Umar Farooq 16	Distt: Hangu
57.	IHC Mushtaq Ahmed 685	Distt: Karak
58.	IHC Badshah Hussain 362	Distt: Hangu
59.	IHC Muhammad Riaz 1207	Distt: Kohat
60.	IHC Shafi ur Rahman 783	Distt: Kohat
61.	IHC Shahbaz Khan 306	Distt: Hangu
62.	IHC Mazhar Abbas 1145	Distt: Kohat
63.	IHC Zaher ul Islam 25	Distt: Karak
64.	IHC Awalyas Khan 368	Distt: Karak
65.	IHC Javed Hussain 1208	Distt: Kohat
66.	IHC Toor Abbas Khan 131/428	CTD
67.	IHC Sajid Ullah 415	Distt: Karak
68.	IHC Basharat Ali 128/336	Distt: Hangu
69.	IHC Sami ur Rehman 1066	Distt: Kohat
70.	IHC Zafar Iqbal 205	Invest: Karak
71.	IHC Islam Nawaz 09	Distt: Karak
72.	IHC Ijaz Ahmed 92	Distt: Hangu
	IHC Syed Musarrat Hussain 323	Distt: Kohat

Note:- This Office may be informed, if any IHCs of your districts/ Units have died or embraced Shahadaat, Retired, reverted or dismissed from service, please.


Regional Police Officer,
Kohat Region



No 3333-34/PA

Office of the
District Police Officer,
Kohat

Dated 26-5/2022

CHARGE SHEET

I, **MUHAMMAD SULEMAN, DISTRICT POLICE OFFICER, KOHAT,** as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you **IHC Khanwada No. 550** rendered yourself liable to be proceeded against, as you have omitted the following act/omissions within the meaning of Rule 3 of the Police Rules 1975.

- i. ***That it has been reported vide daily diary report No. 08 dated 16.05.2022, Police station Jarma, that you were in possession of a case property motor car No. LXJ 417 / Lahore seized in case FIR No. 454 dated 29.09.2021 u/ss 419, 420, 471 PPC PS Jarma parked in Police station.***
- ii. ***That you illegally used the above vehicle for your personal used, while W/IGP Khyber Pakhtunkhwa, had already taken a serious notice of case property vehicles / seized vehicles in illegal usage, which was circulated to all concerned. Thus you willfully violated the lawful orders, misused your authority.***
- iii. ***That as per daily diary mentioned above you have further handed over the vehicle to one HC Musharaf of FRP (who changed number plate as LED No. 2056) and while trafficking narcotics in the said case property vehicle is arrested by Excise, control of narcotics department at Peshawar vide FIR No. 87 dated 14.05.2022 u/ss 9 D-KP CNSA PS Excise district Peshawar.***

2. By reasons of the above, you appear to be guilty of misconduct under Rule 3 of the Rules ibid and have rendered yourself liable to all or any of the penalties specified in the Rule 4 of the Rules ibid.

3. You are, therefore, required to submit your written statement within 07days of the receipt of this Charge Sheet to the enquiry officer.

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 ex-parte action shall be taken against you.

4. A statement of allegation is enclosed.

**DISTRICT POLICE OFFICER,
KOHAT**

Kohat Region, Kohat

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موجودہ دستاویز
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06/06

- To -
- 1) ✓ The Deputy Inspector General of Police
CTD, Khyber Pakhtunkhwa, Peshawar
 - 2) ✓ The Deputy Inspector General of Police
Special Branch, Khyber Pakhtunkhwa, Peshawar
 - 3) ✓ The Commandant,
Police Training College, Hangu.
 - 4) ✓ The District Police Officers,
Kohat, Karak, Hangu & Kurram.
 - 5) The Superintendent of Police,
Investigation, Kohat & Hangu
 - 6) The Superintendent of Police,
FRP Kohat Range, Kohat

No. 2250 S.C. EC. Dated Kohat the 27/06/2022.

Subject - DEPARTMENTAL PROMOTION COMMITTEE.

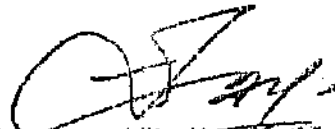
MEMO

Please direct the following IHCs of your respective districts / units to appear in DPC meeting scheduled to be held on 29.06.2022 (Wednesday) in connection with their promotion to the rank of Offg: ASIs:-

S.No	Name Rank & Number	Place of Posting
1	IHC Abdul Hameed No. 1104	Kohat district
2	IHC Abdul Jabar No. 120	CTD/Kohat district
3	IHC Khan Gul No. 1349	Karak district
4	IHC Chiragh Shah No. 759	Invest: Kohat
5	IHC Fazal Subhan No. 124	Karak district
6	IHC Muhammad Rafique No. 24	Kohat district
7	IHC Muhammad Rauf No. 557	Kohat district
8	IHC Kamran Hussain No. 420	Hangu district
9	IHC Qamar Zaman No. 52	PTC Hangu
10	IHC Shahid Saleem No. 146	Hangu district
11	IHC Javed Iqbal No. 445	Kohat district
12	IHC Sami Ullah No. 309	Hangu district
13	IHC Saleem Raza No. 1081	Kohat district
14	IHC Sabir Khan No. 22 / 132	Kohat district
15	IHC Nawab Ali No. 388-41	CTD Kohat
16	IHC Shahid Ali 308	Hangu district
17	IHC Obaid Ullah 289	Kohat district
18	IHC Tasawar Shah 343 / 862	S.B/Kohat district
19	IHC Qasid Ali 292 / 1115	Invest: Hangu
20	IHC Safi Ullah 26	Karak district
21	IHC Abdul Humid 17 / 604	Kohat district
22	IHC Khaliq Nawaz 935	Kohat district
23	IHC Mumir Hussain 224	Hangu district
24	IHC Irfan 51	Invest: Kohat
25	IHC Muhammad Sharif 1203	Kohat district
26	IHC Habib ur Rehman 114	Kohat district
27	IHC Ahmad Rehman 303	Hangu district

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28	IHC Gul Akbar 341	Hangu district
29	IHC Muhammad Yasin 456	CTD /Kohat
30	IHC Muhammad Muslim 170	SPL FRP/Kohat distt
31	IHC Ghulam Mustafa 978	CTD/Kohat district
32	IHC Aziz Ahmed 977	Karak district
33	IHC Syed Nadeem Shah 887	Kohat district
34	IHC Syed Altab Haider 310	Kurram district
35	IHC Sarwar Abbas 179	Hangu District
36	IHC Javed Younis 641/62	Kohat District
37	IHC Syed Irshad Hussain 68	Invest: Hangu
38	IHC Amil Badshah 789	Karak district
39	IHC Noor Moeen 493	Kohat district
40	IHC Asmat Ullah 814	Kohat district
41	IHC Jaffar Khan 445	Kohat district
42	IHC Fazal Wahab 240	Karak district
43	IHC Sahib Noor 103	Kohat district
44	IHC Muhammad Khan 315	Kohat district
45	IHC Nasrullah Khan 704	Kohat district
46	IHC Ghulam Farid 517	Karak district
47	IHC Khan Wada 550	Kohat district
48	IHC Wahid Noor 294	Hangu district
49	IHC Sohail Ahmed 478/627	CTD / Kohat district
50	Adhoc ASI Hakim Shah 284/IHC	Kohat district
51	IHC Abdur Razaq 802	Invest: Karak
52	IHC Sargand Ali 208	Hangu district
53	IHC Syed Zahir Shah 05	Hangu district


 Regional Police Officer.
 Kohat Region

ORDER.

On the recommendation of Departmental Promotion Committee, in its meeting held in Region Police Office Kohat on 29.06.2022, the following senior most eligible HCs on list 'D' of this Region, are hereby approved for promotion as Offg: Asstt: Sub-Inspectors (SPS-11) against the existing vacancies of Kohat Region with immediate effect -

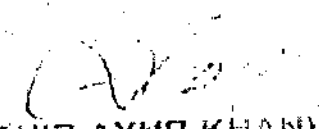
S. No.	Rank, Name & No. of official	Posting
1	IHC Abdul Jabar No. 120	CTD
2	IHC Chiragh Shah No. 759	Invest: Kohat
3	IHC Muhammad Rafique No. 24	Hangu district
4	IHC Muhammad Rauf No. 557	Kohat district
5	IHC Kamran Hussain No. 420	Hangu district
6	IHC Qamar Zaman No. 52	Hangu district
7	IHC Shahid Saleem No. 146/323	Kohat district
8	IHC Javed Iqbal No. 445	Kohat district
9	IHC Sami Ullah No. 309/57	Hangu district
10	IHC Saleem Raza No. 1081	Invest: Kohat
11	IHC Sabir Khan No. 22 / 132	Kohat district
12	IHC Nawab Ali No. 355/41	Hangu district
13	IHC Shahid Ali 308	Hangu district
14	IHC Obaid Ullah 289	Kohat district
15	IHC Tasawar Shah 343 / 862	Special Branch
16	IHC Qasid Ali 292 / 1115	invest: Hangu
17	IHC Safi Ullah 26	Karak district
18	IHC Abdul Hamid 17 / 604 / 916	Kohat district
19	IHC Khaliq Nawaz 935	Kohat district
20	IHC Munir Hussain 224	Hangu district
21	IHC Irfan 51	Invest: Kohat
22	IHC Muhammad Sharif 1203	Kohat district
23	IHC Habib ur Rehman 114	Kohat district
24	IHC Ahmad Rehman 303	Hangu district
25	IHC Gul Akbar 341	Hangu district
26	IHC Muhammad Yasin 456	CTD
27	IHC Muhammad Muslim 170	FRP
28	IHC Ghulam Mustafa 978	CTD
29	IHC Aziz Ahmed 977	Karak district
30	IHC Syed Nadeem Shah 887	Special Branch
31	IHC Syed Aftab Haider 310	Kurram district
32	IHC Sarwar Abbas 179	Hangu district
33	IHC Javed Younas 641/62	Kohat district
34	IHC Syed Irshad Hussain 68	Invest: Hangu
35	IHC Amil Badshah 789	Karak district
36	IHC Noor Moeen 493	Karak district
37	IHC Asmat Ullah 814	Kohat district
38	IHC Sahib Noor 103	SB
39	IHC Muhammad Khan 315	Kohat district

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41	IHC Nasirullah Khan 701	Kohat district
42	IHC Ghulam Farid 51	Kohat district
43	IHC Wajid Noor 294	Hangu district
44	IHC Sohail Ahmed 478	C.I.D.
45	Adhoc ASI Hakim Shah 284	Kohat district
46	IHC Abdur Razaq 302	Law Branch
47	IHC Sargand Ali 208	Hangu district
48	IHC Syed Zahir Shah 05	Hangu district

Their promotion will take effect from the date they actually assume the charge of next higher post and their posting order shall be raised separately.

Necessary gazette notification may be issued accordingly.

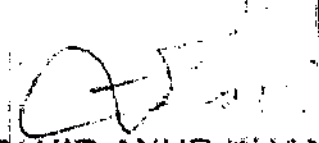

 (TAHIR AYUB KHAN) PSP
 Regional Police Officer,
 Kohat Region.

OFFICE OF THE REGIONAL POLICE OFFICER, KOHAT REGION

No. 10851-63/EC dated Kohat the 2 107 /2022

Copy of above is submitted for favour of information to -

1. The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. The Deputy Inspector General of Police, CTD, KP Peshawar.
3. The Commandant, Police Training College, Hangu.
4. The Commandant, Frontier Reserve Police, KP, Peshawar.
5. The Deputy Inspector General of Police, Special Branch, KP, Peshawar.
6. All Heads of Police Offices, Kohat Region.
7. Confidential Clerk, Region Office, Kohat


 (TAHIR AYUB KHAN) PSP
 Regional Police Officer,
 Kohat Region
 2/7/22



E

14

OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT
Tel: 0922-9260116 Fax 9260125

ORDER

This order will dispose of departmental enquiry initiated against IHC Khanwada No. 550 (herein after called accused) under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendments 2014).

2. In essence, the local Police of Police station Jarma had seized a motor car No. LXJ 417 – Lahore in case FIR No. 454 dated 29.09.2021 u/ss 419, 420, 471 PPC and safe parked in PS as, case property.
3. As report vide DD No. 08 dated 16.05.2022, the said motor car / case property is illegally taken away by accused and handed over to one FRP official named Musharaf. The later replaced the original number plate of the vehicle with No. LED – 2056, and arrested by Excise department Peshawar, while he (Musharaf) was trafficking a huge quantity of charas in the said case property vehicle. Therefore, a case FIR No. 87 dated 14.05.2022 u/ss 9 D CNSA PS Excise, Peshawar is registered against Musharaf with seizing of the said motor car.
4. For the above, the accused is served with charge sheet alongwith statement of allegations and a regular enquiry is initiated in aid of inquiry officer under the rules ibid.
5. In reply to charge sheet, accused stated that he is in possession of case property while he was posted as Moharir PS Jarma and the car was in his use. On conclusion, the enquiry officer has established the charges leveled against accused, held him guilty and recommended for major punishment.
6. In pursuance of enquiry report, final show cause notice is issued / served upon the accused and in reply he again admitted illegal taken away and misuse of case property.
7. In order to legitimate defense, the accused is heard in O.R held on 15.07.2022, wherein he stated the above and again admitted misuse of his authority and grave misconduct.
8. I have gone through the record, which indicates that time and again strict directions have been issued to all concerned for safe custody of all kind of case properties in respective police stations and no one is allowed for personal use of case property. Despite, clear directions by high-ups, the accused willfully violated the lawful orders of his seniors, misused his authority which amounts to his grave misconduct and established against him. Besides, above in these circumstances, involvement and joining hands of accused with arrested accused Musharaf in trafficking of narcotics can not be ruled out.

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15

9. Therefore, in view of above, I reached to the conclusion that the charges leveled against accused have been established beyond any shadow of doubt. In addition, accused caused embarrassing situation to the entire department and his retention in a disciplined department is not warranted under the rules and accused deserves for an exemplary punishment. His service record is also in different. However, in view of his length of service, I, Muhammad Suleman, District Police Officer, Kohat in exercise of the powers conferred upon me, punishment of **compulsory retirement from service** under rule 4 (b) (ii) of the rules ibid is imposed on accused IHC Khanwada No. 550 with immediate effect. Kit etc issued to accused be collected.

Announced
15.07.2022

(MUHAMMAD SULEMAN) PSP
DISTRICT POLICE OFFICER,
KOHAT

OB No. 221

Date 27-7-2022

No 8482-84 IPA dated Kohat the 28-07-2022.

Copy of above is submitted for favor of information to the:-

1. Regional Police Officer, Kohat, please
2. Reader/SRC/OHC/Pay officer for necessary action.

(MUHAMMAD SULEMAN) PSP
DISTRICT POLICE OFFICER,
KOHAT

POLICE DEPTT:

F

(16)

KOHAT REGION

ORDER.

This order will dispose of a departmental appeal, moved by the Ex-IHC Khan Wada No. 550 of district Kohat against the punishment order, passed by DPO Kohat vide OB No. 221, dated 27.07.2022 whereby he was awarded major punishment of compulsory retirement from service on the allegations of misusing case property i.e. Motorcar and its further delivering to one Musharaf (FRP official) before attending course at Nowshera. The said official while trafficking huge quantity of Chars in aforesaid Motorcar was caught red-handed by the Excise & Narcotics Control Department Peshawar.

He preferred appeal to the undersigned, upon which comments were obtained from DPO Kohat and his service record was perused. He was also heard in person in Orderly Room held in this office on 13.09.2022. During hearing the appellant did not advance any plausible explanation in his defense to prove his innocence.


I have gone through the available record which indicates that the allegations leveled against the appellant have been proved and the same have also been established by the E.O in his findings. Despite of issuing clear cut directives by the high ups not to use case property for personal use but the appellant violated the law / rules and thus tantamount to gross professional misconduct which has earned bad name for whole of the department. Therefore, in exercise of the powers conferred upon the undersigned, his appeal being devoid of merits is hereby rejected.

Order Announced
13.09.2022


(TAHIR AYUB KHAN) PSP
Region Police Officer,
Kohat Region.

No. 134608 /EC, dated Kohat the 14/09 2022.

Copy to District Police Officer, Kohat for information and necessary action w/r to his office Letter No. 7943/LB, dated 29.08.2022. His Service Record is returned herewith.


(TAHIR AYUB KHAN) PSP
Region Police Officer,
Kohat Region.

G

17

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.



Service Appeal No. 1468/2022

Date of Institution ... 12.10.2022

Date of Decision... 14.09.2023

Ex-Head Constable, Khanwada No.550, Police Force, Kohat ... (Appellant)

VERSUS

The Regional Police Officer, Kohat Region, Kohat and 01 other. ... (Respondents)

MR. ASHRAF ALI KHATTAK, Advocate --- For appellant.

MR. ASIF MASOOD ALI SHAH, Deputy District Attorney --- For respondents.

SALAH-UD-DIN --- MEMBER (JUDICIAL)
FAREEHA PAUL --- MEMBER (EXECUTIVE)

JUDGMENT:

SALAH-UD-DIN, MEMBER:- Precise facts giving rise to filing of the instant appeal are that departmental action was taken against the appellant on the allegations reproduced as below:-

"i. That it has been reported vide daily diary report No. 08 dated 16.05.2022, Police station Jarma, that you were in possession of a case property motor car No. LXI 417/ Lahore seized in case FIR No. 454 dated 29.09.2021 u/ss 419, 420, 471 PPC PS Jarma parked in Police station.

ii. That you illegally used the above vehicle for your personal use, while W/IGP Khyber Pakhtunkhwa had already taken a serious notice of case property

[Handwritten signature]

ATTESTED
[Signature]
Khyber Pakhtunkhwa
Services Tribunal
Peshawar

vehicles /seized vehicles in illegal usage, which was circulated to all concerned. Thus you willfully violated the lawful orders, misused your authority.

iii. That as per daily diary mentioned above you have further handed over the vehicle to one HC Musharaf of FRP (who changed number plate as LED No. 2056) and while trafficking narcotics in the said case property vehicle is arrested by Excise, control of narcotics department at Peshawar vide FIR No. 87 dated 14.05.2022 u/s 9 D-KP CNSA PS Excise district Peshawar."

2. On conclusion of the inquiry, the appellant was awarded major punishment of compulsory retirement from service vide order bearing O.B No. 221 dated 27.07.2022. The departmental appeal of the appellant was rejected by Regional Police Officer Kohat Region vide order dated 13.09.2022, hence the instant service appeal.

3. On receipt of the appeal and its admission to regular hearing, respondents were summoned, who put appearance through their representative and contested the appeal by way of filing written reply raising therein numerous legal and factual objections.

4. Learned counsel for the appellant has contended that the appellant was on Elite Tactical Course at Elite Police Training Centre, Nowshera with effect from 14-03-2022 to 22-05-2022 and was neither in possession of the concerned motorcar nor had he handed over the same to Musharaf, who was arrested in case FIR No. 87 dated 14.05.2022 u/s 9 D-KP CNSA PS Excise District Peshawar, that Dildar

HC was serving as Muharar in Police Station Jarra during the relevant

ATTESTED

MAJESTER
 CIVIL SUPPLEMENTARY
 COURT PESHAWAR

days, while the appellant was on training, therefore, he could not be saddled with responsibility of misusing of the concerned motorcar; that the inquiry proceedings were conducted in a slipshod manner and the appellant was not provided any opportunity of personal hearing or self defence; that no one was examined as witness during the inquiry in support of the allegations leveled against the appellant but even then the inquiry officer had wrongly and illegal given findings that the allegations against the appellant were proved; that the impugned orders may be set-aside and the appellant may be reinstated in service with all back benefits.

5. On the other hand, learned Deputy District Attorney for the respondents had contended that the motorcar in question was taken into possession as case property in case FIR No. 454 dated 29.09.2021 u/s 419,420,471 PPC PS but the same was handed over by the appellant to one Musharaf, who was arrested for smuggling of Narcotics in the same; that a regular inquiry was conducted in the matter by providing opportunity of personal hearing as well as self defence to the appellant; that the allegations against the appellant were stood proved in a proper inquiry, therefore, he has rightly been awarded the punishment of compulsory retirement from service.

6. Arguments have already been heard and record perused.

7. The motorcar bearing registration No. LXJ 417 Lahore was case property of case FIR No. 454 dated 29.09.2021 under sections 419/420/471 PPC registered in Police Station Jarra. It was on 14.05.2022 that the said motorcar was intercepted by officials of Police

ATTESTED

419/420/471
PPC
14.05.2022

Station Excise District Peshawar and Charas weighing 12000/- gram was recovered from the same. The motorcar was allegedly being driven by one Musharaf Khan S/O Azad Gul resident of Said Ali Banda Karak, who was arrested. On receipt of information regarding taking into possession of the motorcar bearing registration No.LXJ 417 Lahore, by officials of Police Station Excise District Peshawar, Dildar IHC Police Station Jarra entered the same in daily diary No. 08 dated 16.05.2022, wherein it was mentioned that the motorcar in question was handed over to the appellant. In view of contents of Daily Diary No. 08 dated 16.05.2022 of Police Station Jarra, disciplinary action was taken against the appellant, which concluded into compulsory retirement of the appellant from service.

8. It is evident from the record that during the relevant days, the appellant was not serving as Muharrar in Police Station Jarra rather he was admittedly on training in Elite Police Training Centre Nowshera with effect from 14.03.2022 till 22.05.2022. Dildar IHC was serving as Muharrar in Police Station Jarra during the relevant days and it was he, who recorded in daily diary No. 08 dated 16.05.2022 that he had handed over the motorcar in question to the appellant. Except bare entry in daily diary regarding handing over the motorcar in question to the appellant, no oral or documentary evidence was procured by the inquiry officer in support of the allegations of handing over the motorcar in question to the appellant. The inquiry officer even did not bother to examine Dildar IHC, whose status was that of a complainant in the matter in question. Even otherwise too, Dildar IHC was not

ATTACHED

ADMITTED
 16/05/2022
 16/05/2022
 16/05/2022

clothed with any legal Authority for handing over the motorcar in question to the appellant and for the sake of arguments, if his assertion is admitted as correct then he was also liable to have been proceeded against for unlawfully handing over the motorcar in question to the appellant. While scanning the record, we have observed that the motorcar in question was case property but the same was not dealt with in accordance with the rules prescribed in Police Rules, 1934. The concerned SHO, who was Incharge of Police Station had also not bothered to observe the relevant rules of Police Rules, 1934 regarding the motorcar in question, which was a case property. The inquiry officer had conducted the inquiry in a slipshod manner and had not even afforded an opportunity to the appellant to record statement in his self defense.

9. In view of the above discussion, the impugned orders are set-aside and the appellant is reinstated in service with all back benefits. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
14.09.2023

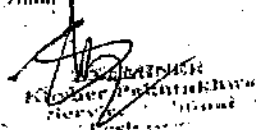


(SALAH-UD-DIN)
MEMBER (JUDICIAL)



(FAREEHA PAUL)
MEMBER (EXECUTIVE)

*Naamul Amin
ATTESTED



Date of Processing 14-9-23
 Number of page 5
 Copying 25/-
 Urgent 25/-
 Total
 Name
 Date of 09/10/23
 Date of 09/10/23

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POLICE DEPARTMENT

DISTRICT KOHAT

ORDER

In compliance with the judgment dated 14.09.2023, passed by Khyber Pakhtunkhwa Service Tribunal Peshawar in service appeal No. 1468/2022 and consequent upon approval by the competent authority vide CPO letter No. 7072/ Legal dated 06.12.2023, Ex-Head Constable Khan Wada No. 550 is hereby reinstated into service conditionally and provisionally subject to outcome of CPLA. The issue of back benefits is also subject to outcome of CPLA lodged by the Police Department in the Apex court.

H //

OB NO. 1068 /SRC
dated 14-12-2023

DISTRICT POLICE OFFICER,
KOHAT

OFFICE OF THE DISTRICT POLICE OFFICER KOHAT

8059-62/SRC, dated Kohat the 15/12/2023.

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- Copy for necessary action to the: -
- DSP Legal Kohat with the direction to pursue the case / objection petition to the extent of back benefits as directed by AIG Legal CPO Peshawar vide letter quoted above.
- Reader / Pay Officer / OHC.
- Appellant for information.

23

I

To
The Worthy Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar

CamScanner

SUBJECT: DEPARTMENTAL APPEAL FOR PROMOTION TO THE RANK OF OFFICIATING ASSISTANT SUB INSPECTOR (BPS-09) WITH EFFECT FROM 21.07.2022 IS THE DATE ON WHICH THE BATCHMATES AND JUNIORS WERE PROMOTED TO THE RANK OF OFFICIATING ASSISTANT SUB INSPECTOR (BPS-09)

Respectfully Submitted: -

1. That the appellant was appointed in the police department as Constable and after completing his due training and courses he was promoted the rank of Head Constable in the year 2016 and since his appointment the appellant is performing her duty with devotion and honesty, whatsoever, assigned to him and no complaint has been filed regarding his performance by his high ups.
2. That the appellant while serving the said capacity, charge sheet was issued to him on 26.05.2022 on some baseless allegations and during the pendency of inquiry proceeding against the appellant, Departmental Promotion Committee meeting was scheduled to be held on 29.06.2022 for promotion to the rank of Officiating ASIs. The name of batchmates and juniors to the appellant were sent to DPC scheduled on 29.06.2022 for promotion to the rank of Officiating ASIs through memo dated 27.06.2022, however, the name of the appellant was not included in the memo dated 27.06.2022 due to pending inquiry against him and on the recommendation of DPC, batchmates and juniors to the appellant were promoted to the rank of officiating ASI vide order dated 21.07.2022.
3. That without conducting proper and regular inquiry against the appellant to the dig out the reality about the allegations, the appellant was compulsory retired from service vide order dated 28.07.2022 and his departmental appeal against the order dated 28.07.2022 was also rejected on 14.09.2022.
4. That the appellant challenged the orders dated 28.07.2022 and 14.09.2022 in the Khyber Pakhtunkhwa Service Tribunal in service appeal No.1468/2022. The Khyber Pakhtunkhwa Service Tribunal heard and decided the appeal of the appellant on 14.09.2023. The Khyber Pakhtunkhwa Service Tribunal accepted the appeal of the

appellant, set aside the orders dated 28.07.2022 and dated 14.09.2023 and reinstated the appellant in service with all back benefits.

That in the compliance of judgment dated 14.09.2023 of Khyber Pakhtunkhwa Service Tribunal, the appellant was reinstated into service vide order dated 14.12.2023 and as the appellant was reinstated by Khyber Pakhtunkhwa Service Tribunal with all back benefits and as such the appellant is entitle to be promoted to the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 i.e. the date when his batchmates and juniors were promoted to the rank of officiating Assistant Sub Inspector (BPS-09), therefore, the appellant wants to file this departmental appeal to promote him to the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 along with his batchmates and juniors on the following grounds

POINTS:

- A) That not promoting the appellant in the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 along with his batchmates and juniors is against the law, rules principle of natural justice and fair play.
- B) That the appellant was eligible for promotion to the rank of officiating Assistant Sub Inspector (BPS-09) at the time of DPC scheduled on 20.06.2022 for promotion to the rank of ASIs, but his name was not included in that DPC due to pending inquiry against him on baseless allegations and on the basis of that DPC his batchmates and juniors were promoted to the rank of officiating ASI (BPS-09) on 21.07.2022 and the appellant was then compulsory retired from service on 28.07.2022 on that baseless allegation which was set aside by the Khyber Pakhtunkhwa Service Tribunal in its judgment dated 14.09.2023 and the appellant was reinstated into his service with all back benefits, which shows that there remain no ground to deprive the appellant from his legal right of promotion to the rank of officiating ASI (BPS-09) along with his batchmates and juniors who were promoted on 21.07.2022.
- C) That the appellant was compulsory retired from service on 28.07.2022 on baseless allegations, which was set aside by the Khyber Pakhtunkhwa Service Tribunal in its judgment dated 14.09.2023 and the appellant was reinstated into his service with all back benefits which means that the appellant was in the same position as was before the penalty order dated 28.07.2022 and it is the legal right of the appellant to be promoted to the rank of officiating Assistant Sub Inspector (BPS-09) with effect from

21.07.2022 is the date when his batchmates and juniors were promoted to the rank of officiating Sub Inspector (BPS-09)

- D) That the appellant was not considered in the DPC hold on 29.06.2022 for promotion to the rank of officiating ASI (BPS-09) due to pending inquiry against him on baseless allegations and on the basis of that DPC his batchmates and juniors were promoted to the rank of officiating ASI (BPS-09) on 21.07.2022 and later on he was compulsory retired from service on 28.07.2022 on that baseless allegation which was set aside by the Khyber Pakhtunkhwa Service Tribunal in its judgment dated 14.09.2023 and the appellant was reinstated into his service with all back benefits and as such the appellant could not be deprived from his legal right of promotion to the rank of officiating ASI (BPS-09) along with his batchmates and juniors.
- E) That many officials who were juniors to the appellant were promoted to the rank of ASI in the order dated 21.07.2022 and if the appellant was not departmentally proceeded on baseless allegations, he would be promoted to the rank of ASI along with his batchmate and juniors in the order dated 21.07.2022.
- F) That the appellant was eligible for promotion to the rank of officiating Assistant Sub Inspector (BPS-09) on 21.07.2022, but he was not ignored from promotion due to pending inquiry against him on baseless allegations and later on he was compulsory retired from service on 28.07.2022 on that baseless allegation which was set aside by the Khyber Pakhtunkhwa Service Tribunal in its judgment dated 14.09.2023 and the appellant was reinstated into his service with all back benefits and as per superior court judgments that when an official was dismissed/removed or compulsory retired from service and then reinstated into service after not proving allegations against him, then such official is entitle for all back benefits including promotion and as such the appellant is entitle for legal right of promotion from the date when his batchmates and juniors were promoted.
- G) That not promoting the appellant to the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 along with his batchmates and juniors will effect his further promotion which will cause irreparable loss to the appellant in the shape of pension and other monetary benefits for no fault on his part.
- H) That the appellant has not been treated in accordance with law and rules and has been kept deprived from his legal right of promotion to the rank of officiating Assistant Sub Inspector (BPS-09) with effect from 21.07.2022 along with his batchmates and juniors.

Khan Wadn, Head Constable
Police Station Cantt Kohat
PP Bannu Gate

15/08/24
[Signature]

Yours obediently

Dated

It is therefore, most humbly requested that on the acceptance of this departmental report, the applicant may kindly be promoted to the rank of officiating Assistant Sub Inspector (MPS-09) with effect from 21.07.2022, i.e. the date when his batchmates and juniors were promoted to the rank of officiating Assistant Sub Inspector (MPS-09) with all back and consequential benefits on the basis of above submission.

(96)

VAKALAT NAMA

NO. _____/2024

IN THE COURT OF K.P. Service Tribunal Peshawar

Khan Wada

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Police department


(Respondent)
(Defendant)

I/We, Khan Wada

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: 17101-7395344-5
Cell No. 03339390916