

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

Service Appeal No.198/2024

Javed s/o Bajay Gul, Ex-Police Constable No. 3662
r/o Village Angoor Adda, Tehsil Birmal SWTD

...(Appellant)

Versus

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, Dera Ismail Khan.
3. District Police Officer, SWTD (Wana).

....(Respondents)

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DEPONENT

**BEFORE THE HONOURABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
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2. Regional Police Officer, Dera Ismail Khan.
3. District Police Officer, SWTD (Wana).(Respondents)

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS (1 to 3)

Respectfully sheweth,

Parawise Comments are submitted as under:-

PRELIMINARY OBJECTIONS

1. That the appellant has got no cause of action.
2. That the appeal is bad for misjoinder/non-joinder of necessary parties.
3. That the appeal is badly time barred.
4. That the appellant has not come with clean hands.
5. That the appellant is estopped due to his own conduct.
6. That the appellant has concealed the material facts from Honourable Tribunal.

REPLY ON FACTS

1. Pertains to record, needs no reply.
2. Pertains to record.
3. Pertains to record.
4. Incorrect. Infact the appellant while posted at Police Lines DIKhan as per DD No. 15 dated 02.01.2023 absented himself from lawful duties w.e.from 02.01.2023 to date of dismissal i.e.08.05.2023 without any leave or permission from the higher authorities. In this regard a Charge Sheet alongwith Statement of Allegation vide No. 195-196/SWTD dated 24.02.2023 issued and departmental enquiry was conducted by SDPO HQrs SWTD who stated in his finding that the appellant failed to appear before the enquiry officer and recommended him for punishment. A final show cause notice vide No. 11/SWTD, dated 25.04.2023 was issued and ample opportunities of defence were provided to the appellant, but he failed to prove his innocence. Hence, he was awarded major punishment of Dismissal from Service vide OB No. 689, dated 08.05.2023 in the light of Section 5(5) of Police Rules 1975 (Amended 2014).

“On receipt of the findings of the Inquiry Officer or where no such officer is appointed, on receipt of the explanation of the accused, if any, the authority shall determine whether the charge has been proved or not. In case the charge is proved the authority shall award one or more of major or minor punishments as deemed necessary”.

Copies of the charge sheet, Inquiry, Final Show Cause Notice and dismissal order are annexed as Annexure-A, B, C & D respectively.

5. Incorrect. There is no such clerical mistake has been caused, in police department a police official can be identified by his belt number. In fact, the appellant has not only been absent from lawful duties, rather has deliberately not joined the inquiry proceedings. Which shows his lack of interest in official duties and found misconduct, which is punishable under KP Police Rules 1975 (Amended 2014).
6. Correct to the extent that the departmental appeal of appellant was rejected by the Appellate Authority (Respondent No.2) on the following grounds: Copy Annex "E"
- I. According to DD No. 15 dated 02.01.2023 Police Lines SWTD, the appellant was absent from his lawful duties dated 02.01.2023 to date of dismissal i.e.08.05.2023 without any leave or permission/approval from the high ups.
 - II. DPO SWTD served the appellant with chage sheet. Enquiry into the matter was got conducted into through Mr. Nadir Khan SDPO HQrs SWTD who stated in hi finding that the appellant failed to appear before the enquiry officer and recommended for punishment.
 - III. DPO SWTD has awarded major punishment for Dismissal From Service vide office order No. 43, dated 08.05.2023 & OB No. 689, dated 08.05.2023.
 - IV. Perusal of the Service record of the applicant and comments received from DPO SW Lower the intent appeal is time barred.
 - V. Moreover, as per Section 11(1) KP Police Rules 1975 (as amended in 2014) the appeal of appellant not within of 30days, badly time barred.
"An accused who has been awarded penalty under these rules may within a thirty days from the date of communication of the order prefer and appeal to the appellate authority as provided in sub-rules (2)".
7. Incorrect. The revision petitioner of appellant was rejected by the Reviewing Authority (Respondent No.1) being time barred. (Copy Annex "F"). In view of above circumstance the appeal of appellant not maintainable on the following grounds.

REPLY ON GROUNDS

1. Incorrect. The appellant while posted at Police Lines DIKhan, as per DD No. 15 dated 02.01.2023 absented himself from lawful duties w.e.from 02.01.2023 to date of dismissal i.e.08.05.2023 without any leave or permission from the higher authorities. In this regard, a Charge Sheet alongwith Statement of Allegation vide No. 195-196/SWTD dated 24.02.2023 issued and departmental enquiry was conducted by SDPO HQrs SWTD who stated in his finding that the appellant failed to appear before the enquiry officer and recommended him for punishment. A final show cause notice vide No. 11/SWTD, dated 25.04.2023 was issued and ample opportunities of defence was provided to the appellant, but he failed to prove his innocence. Hence, he was awarded major punishment of Dismissal from Service vide OB No. 689, dated 08.05.2023 in the light of Section 5(5) of Police Rules 1975 (Amended 2014).
"On receipt of the findings of the Inquiry Officer or where no such officer is appointed, on receipt of the explanation of the accused, if any, the authority shall determine whether the charge has been proved or not. In case the charge is proved the authority shall award one or more of major or minor punishments as deemed necessary".
2. Incorrect. The allegation of misconduct was proved against him during the course of inquiry and the authority decides the misconduct or act of omission or commission referred to above should be dealt with in General Police Proceedings as per Section-5(3) and 5(3)(a), Police Rules 1975 (Amended 2014) below:

Section 5(3)(a) "The authority shall determine if in the light of facts of the case or in the interests of justice, a departmental inquiry, through an Inquiry Officer if necessary"

And as per Section 2(b)(iv) he was awarded major punishment in the light of Section 5(5) of Police Rules 1975 (Amended 2014).

Section 5(5) "On receipt of the findings of the Inquiry Officer or where no such officer is appointed, on receipt of the explanation of the accused, if any, the authority shall determine whether the charge has been proved or not. In case the charge is proved the authority shall award one or more of major or minor punishments as deemed necessary".

3. Incorrect. Infact the petitioner remained absent from lawful duties without prior leave or permission in the regard a Judgment of Honourable Sindh High Court Bench at Sukkur is worthy consideration in which the Honourable Court order that:

The Hon'ble Supreme Court has time and again deprecated the grant of any indulgence to the employees who remained absent from duties without prior leave or permission and reference in this regard may be made to the cases reported as Deputy Inspector General of Police v Sarfraz Ahmed [2022 PLC (CS) 278], Secretary Elementary & Secondary Education v Noor ul Amin [2022 PLC (CS) 132]; National Bank of Pakistan v Zahoor Ahmed Mengal (2021 SCMR 144) and Federation of Pakistan v Mamoon Ahmed Malik (2020 SCMR 1154). (Copy Annex "G")

4. After observing all the codal formalities the orders were passed by the authorities in accordance with law/rules. Ample opportunities of defence were provided the appellant but he badly failed to prove his innocence.
5. Incorrect. The appellant absorbed in Police Department on year 2020 while in short spam of wilful absent from 02.01.2023 to date of dismissal i.e. 08.05.2023 (Total 126-days) without any leave or permission from the higher authorities. Which shows his gross misconduct punishable under the KP Police Rules 1975 (Amended 2014).
6. Incorrect. Infact the punishment proceedings will be of two kinds. i.e. (a) Summary Police Proceedings and (b) General Police Proceedings and the appellant was dealt with in General Police Proceedings as per Section-5(3) and 5(3)(a), Police Rules 1975 (Amended 2014) and as per Section 2(b)(iv) he was awarded major punishment in the light of Section 5(5) of Police Rules 1975 (Amended 2014). Moreover, the departmental appeal as well as Revision Petition was rejected by the authorities being time barred.
7. Incorrect. No such right of the appellant was ignored by the authorities, and after observing all the codal formalities the orders were passed by the respondents in accordance with law/rules.
8. Incorrect. The appeal of appellant is meritless and badly time barred.
9. Incorrect. The honourable Tribunal better that the Apex Supreme Court of Pakistan has time and again deprecated the grant of any indulgence to the employees who remained absent from duties without prior leave or permission and reference in this regard many verdict has been announced e.g:
- Deputy Inspector General of Police v Sarfraz Ahmed [2022 PLC (CS) 278],
 - Secretary Elementary & Secondary Education v Noor ul Amin [2022 PLC (CS) 132]; National Bank of Pakistan v Zahoor Ahmed Mengal (2021 SCMR 144)
 - Federation of Pakistan v Mamoon Ahmed Malik (2020 SCMR 1154)

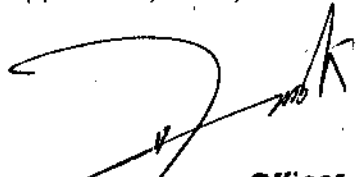
18. That respondents also seeks permission to raise further grounds at the time of arguments.


19. That respondents also seeks permission to raise further grounds at the time of arguments.

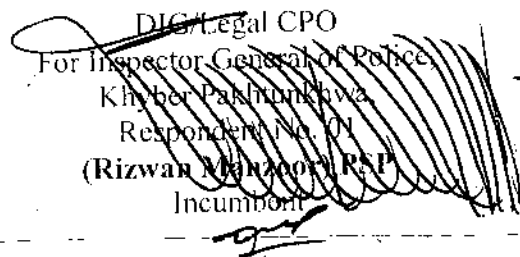
10. That respondents also seeks permission to raise further grounds at the time of arguments.

PRAYER

In view of above, it is prayed that on acceptance of these Parawise Comments, the instant appeal may kindly be dismissed, being meritless and time barred.


**District Police Officer,
South West Frontier Province**
(Respondent No.3)
Farman Ullah Khan
Incumbent


**Regional Police Officer,
Dera Ismail Khan**
(Respondent No.2)
NASIR MEHMOOD SATTI (PSP)
Incumbent


DIG/Legal CPO
For Inspector General of Police,
Khyber Pakhtunkhwa
Respondent No. 01
(Rizwan Manzoor PSP)
Incumbent

BEFORE THE HONOURABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR.

Service Appeal No.198/2024

Javed s/o Bajay Gul, Ex-Police Constable No. 3662
r/o Village Angoor Adda, Tehsil Birmal SWTD

...(Appellant)


Versus

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, Dera Ismail Khan.
3. District Police Officer, SWTD.

....(Respondents)

AFFIDAVIT ON BEHALF OF RESPONDENTS

I, respondent do hereby solemnly affirm and declare on oath that the contents of comments-written reply to Appeal are true & correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense have been struck off/cost.


District Police Officer,
South West Frontier Province
(Respondent No.3)
Farman Ullah Khan
Incumbent

ATTESTED

04 NOV 2024

BEFORE THE HONOURABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR.

Service Appeal No.198/2024

Javed s/o Bajay Gul, Ex-Police Constable No. 3662
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...(Appellant)


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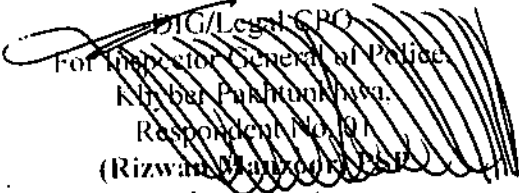
...(Respondents)

A U T H O R I T Y

Mr. Syed Asghar Ali Shah DSP/Inv: SWTD is hereby authorized to appear before the Service Tribunal Khyber Pakhtunkhwa, Peshawar on behalf of Respondents. He is also authorised to produce/ withdraw any application or documents in the interest of Respondents and the Police Department.


District Police Officer,
District Police Officer,
South Waziristan Lower
SWTD
(Respondent No.3)
Farman Ullah Khan
Incumbent


Regional Police Officer,
Dera Ismail Khan
(Respondent No.2)
NASIR MEHMOOD SATTI (PSP)
Incumbent


BIG/ Legal CPO
For Inspector General of Police
Khyber Pakhtunkhwa.
Respondent No. 01
(Rizwan Hattori) PSP
Incumbent



OFFICE OF THE
DISTRICT POLICE OFFICER,
SOUTH WAZIRISTAN TRIBAL DISTRICT.

A

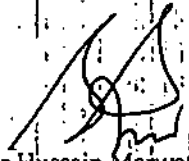
CHARGE SHEET

I Shabir Hussain Marwat District Police Officer, South Waziristan as
Competent Authority, hereby charged you Constable Javed No.3662 of SWTD Police as
follows:-

- i. As per D.D No.15 report dated 02.01.2023 Police Line (SWTD) You have been absented from 02.01.2023 to till date without prior permission/approval from the high ups.
- ii. Being a part of uniformed force your this act shows gross misconduct on your part.

By reason of the above, you appear to be guilty of misconduct under Police Disciplinary Rules, 1975 with amendments 2014 and have rendered yourself liable to all or any of the penalties specified in the Rules:-

- 2) You are, therefore required to submit your written defense within 7 days of the receipt of this Charge Sheet to the Enquiry Officer as the case may be.
- 3) Your written defense, if any, should reach to the Enquiry Officer within the specified period failing which it shall be presumed that you have no defense to put in and in that case, ex parte action will be taken against you.
- 4) You are also at liberty, if you wish to be heard in person.
- 5) Statement of allegation is enclosed.


Shabir Hussain Marwat
District Police Officer,
South Waziristan Tribal District.



SUMMARY OF ALLEGATIONS


1). I, Shabir Hussain Marwat, District Police Officer, South Waziristan Tribal District, am of the opinion that Constable Javed No.3662 of district SWTD has rendered himself liable to be proceeded against as he committed the following acts/omissions within the meaning of Police Disciplinary Rules, 1975 read with Amendments 2014.

STATEMENT OF ALLEGATIONS.

- iii. As per D.D No.15 report dated 02.01.2023 Police Line SWTD. You have been absented from 02.01.2023 to till date without prior permission/approval from the high ups.
- iv. Being a part of uniformed force this act shows gross misconduct on his part.

2). For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations, SDPO HQs Noor Khan is appointed as Enquiry Officer, to conduct enquiry under the Rules.

3). The Enquiry Officer shall, in accordance with the provision of the Police Disciplinary Rules, 1975 read with Amendments 2014 provide reasonable opportunity of hearing to the accused, record its findings and make within 15 days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused.


District Police Officer,
South Waziristan Tribal District

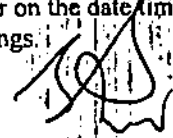
No. 195-196/SWTD

Dated

the 24.02.2023.

Copy of above is forwarded to the:-

1. Enquiry Officer of this district is directed to initiate departmental proceedings against the accused under the Police Disciplinary Rules, 1975 read with Amendments 2014.
2. Constable Javed No.3662 to appear before the Enquiry Officer on the date, time and place fixed by the Enquiry Officer for the purpose of enquiry proceedings.


Shabir Hussain Marwat
District Police Officer,
South Waziristan Tribal District.

Handwritten signature on the right margin: M. B. S.



OFFICE OF THE
DISTRICT POLICE OFFICER,
SOUTH WAZIRISTAN TRIBAL DISTRICT.

No. 71 /SWTD

Dated 25/04 /2023

FC Javed

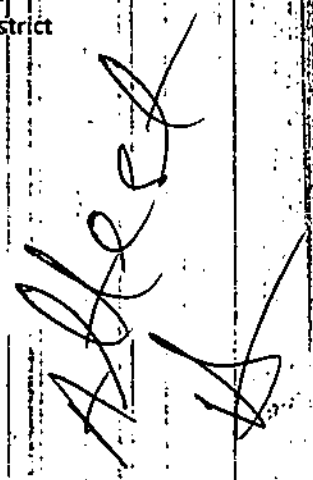
No.3662/SWTD

FINAL SHOW CAUSE NOTICE

1. WHEREAS, You FC Javed No.3662 of this district rendered yourself for disciplinary proceedings by committing gross misconduct and negligence in duty.
2. WHEREAS, You were charge sheeted vide this office No. 195-195/SWTD dated 24/02/2023 and proper departmental enquiry has been conducted against you by the Enquiry Officer and submit enquiry report that you did not receive charge sheet nor produced before the enquiry officer.
3. NOW THEREFORE, I SHABIR HUSSAIN MARWAT, District Police Officer South Waziristan, as competent authority have tentatively decided to impose upon you, any one or more penalties under Police Rules 1975 (amended in 2014).

You are therefore, issued Final Show Cause Notice to explain within seven (07) days of the receipt of the notice as to why the aforesaid penalty should not be imposed upon you. If your reply will not be received within stipulated period then it shall be presumed that you have no defence to offer and ex-parte action shall be taken against you and also intimate whether you wish to be heard in person or not.


District Police Officer
South Waziristan Tribal District





OFFICE OF THE
DISTRICT POLICE OFFICER,
SOUTH WAZIRISTAN TRIBAL DISTRICT.

No. 43 /ES, Dated: SWTD the 08.05 /2023.

OFFICE ORDER

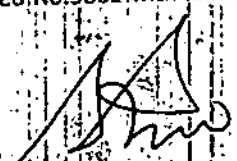
My this order will dispose of departmental enquiry against Constable Javed No.3662 of this District Police SWTD on the allegation that According to D.D No.15 dated 02.01.2023 of police Line SWTD you have been absented from lawful duty dated, 02.01.2023 without prior permission/approval from the high ups. This act is highly objectionable to gross misconduct on your part. For which he was properly charge Sheeted. The SDPO HQrs. Noor Khan SWTD was nominated as inquiry officer. The enquiry was conducted, the alleged official join the departmental enquiry intentionally. Subsequently, the enquiry officer has submitted finding report starting therein that during enquiry all possible resources are utilized to ensure the joining for Personnell hearing of alleged official but he failed to appear before me. The enquiry Officer recommended for punishment against the said official.

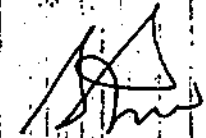
After the perusal finding report, and other relevant materials placed before me, MR. SHBIR HUSSAIN KHAN MARWAT DISTRICT POLICE OFFICER SWTD being competent Authority vested in me under Khyber Pkhtunkhwa Police Rules 1975, amended 2014 hereby awards to Major Punishment of Dismissal From Service to the defaulter Constable Javed No.3662 with immediate effect.

Order announced

Copy 44/46

- Copy of above is submitted to the:-
1. The Regional Police officer, Dera Ismail Khan Region.
 2. All Concerned.


Mr (Shabir Hussein Khan Marwat)
District Police Officer
SWTD


Mr (Shabir Hussein Khan Marwat)
District Police Officer
SWTD

Abdul

18



OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION

☉ 0966-9280291 Pbx # 9280290

No. 9505 /IS

dated 22.1.2023

01/12/2023

ORDER

1. This order disposes off departmental appeal filed by ~~Ex-Constable~~ Javed No. 3622 of District Police SWTD, against the order of Major Punishment of (Dismissal from Service), passed by the DPO SWTD, vide his office Order No. 43 dated 08.05.2023 & OB No. 689 dated 08.05.2023 on the following allegations:

2. "According to DD No. 18 dated 02.01.2023 of Police Line SWTD, he was absent from his lawful duty dated 02.01.2023 to illi date (date of Dismissal) without any leave or permission/approval from the high ups".


ii. DPO SWTD served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Nadir Khan SDPO HQ Dera SWTD who in his finding report, in which he stated that he failed to appear before him and recommended for Punishment.

3. DPO SWTD has awarded Major Punishment of "Dismissal from Service" vide his office Order No. 43 dated 08.05.2023 & OB No. 689 dated 08.05.2023.

4. Perusal of the service record of the applicant and comments received from DPO SWTD Lower the instant appeal is time barred.


5. Keeping in view the above, I, NASIR MEHMOOD SATTI, PSP, Regional Police Officer, Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11, clause-4 (a), of the Police Rules 1975, Amended 2014, do not intend to take a lenient view, therefore **REJECT** his appeal being time barred and uphold the order of Major Punishment of (Dismissal from Service), passed by District Police Officer SWTD vide his Order No. 43 dated 08.05.2023 & OB No. 689 dated 08.05.2023, with immediate effect.


6. Order Announced.


(NASIR MEHMOOD SATTI) PSP
Regional Police Officer
Dera Ismail Khan
30/11

No. 9506 /IS

Copy of above is sent to the DPO SW Lower with reference to his office letter No. 2471 dated 15.11.2023, (Encl: Service Roll & Fauji Missal).


Muhammad Ismail Alizai
Advocate High Court
Dera Ismail Khan


(NASIR MEHMOOD SATTI) PSP
Regional Police Officer
Dera Ismail Khan
20/11

A (19)

Office of the District Police Officer

To 2000

Date 04-01-2023

OFFICER IN CHARGE Lower
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

F



No. SI 2730 /23, dated Peshawar the 22 / 12 / 2023

To: The Regional Police Officer,
Dera Ismail Khan.

Subject: REVISION PETITION.

Memo

The Competent Authority has examined and filed the revision petition submitted by Ex IC Javed No. 3622 of District South Waziristan, against the punishment of dismissed from service awarded by DPO SWTD vide Order Enclst: No. 43, dated 08.05.2023 being time barred.

The applicant may please be informed accordingly.

*Mez 10.5.2023
Dt: 29-12-2023
P.P. S.W. Haver
For information please*

Afsar Jan
20/12/23

(AFSAR JAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

24/12

Attested
Muhammed Ismail Alizai,
Advocate High Court
Dera Ismail Khan.

Attested



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2024.01.12 11:29

Attesters\Letters A17.rtf

24761-6322752-7



IN THE HIGH COURT OF SINDH,
Bench at Sukkur

C. P. No. D – 1953 of 2018

(Gulshan Ali V/S P.O. Sindh & Others)

Hearing of Case

1. For orders on office objection
2. For hearing of Main Case.

Before:

Mr. Justice Muhammad Junaid Ghaffar
Mr. Justice Zulfiqar Ali Sangi

Date of Hearing: 22-02-2022
Date of Decision: 22-02-2022

Mr. Qurban Ali Kalwar, Advocate for the Petitioner.
Mr. Mehboob Ali Wassan, Assistant A.G.

ORDER

Muhammad Junaid Ghaffar, J. – Through this Constitutional Petition, the Petitioner has prayed for the following relief(s):

"i) That this Hon'ble Court may be pleased to direct the respondents to release the salary of petitioner for the period from November, 2017 to March, 2018, and from the month of September, 2018 to date.

ii). To direct the respondents to allow the petitioner to continue as Head Master Govt. Boys Primary School Shah Murad Jagirani taluka Kotdiji".

2. Notices were ordered and comments have been filed, wherein it is stated that the Petitioner continuously remained absent without prior intimation or grant of leave, whereas he was also issued a show-cause notice in this regard. It is further stated that he has remained absent for a total period of 789-days starting from 01.09.2018 to 29.10.2020.

3. While confronted, Counsel for the Petitioner has denied this stance of the Respondents. However, he has not been able to satisfactorily respond to this very specific allegation of petitioner's absence without leave. We in our constitutional jurisdiction cannot decide this factual aspect of the matter, whereas if the Petitioner has remained on duty then

he was supposed to place on record some convincing material including rejoinder affidavit to contradict the stance of the respondents. Nothing has been place on record; therefore, we cannot go into this factual dispute.

4. Even otherwise, the Hon'ble Supreme Court has time and again deprecated the grant of any indulgence to the employees who remained absent from duties without prior leave or permission and reference in this regard may be made to the cases reported as Deputy Inspector General of Police v Sarfraz Ahmed [2022 PLC (CS) 278], Secretary Elementary & Secondary Education v Noor ul Amin [2022 PLC (CS) 132]; National Bank of Pakistan v Zahoor Ahmed Mengal (2021 SCMR 144) and Federation of Pakistan v Mamoon Ahmed Malik (2020 SCMR 1154). Accordingly, this Petition being misconceived is hereby dismissed.

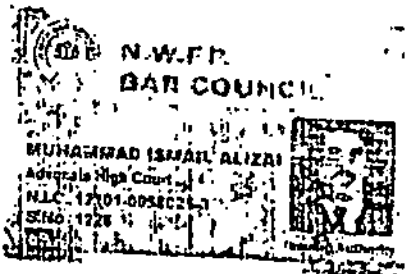
JUDGE

JUDGE

Ahmed

VAKALATNAMA

22



Advocate's Name: MUHAMMAD ISMAIL ALIZAI
Address: ALI KHAN SEWAD ALIZAI
City: D.I. KHAN
Phone No.: 031-227527
Fax No.: 031-227527
E-mail: alizai@peshawarbarcouncil.com
Website: www.peshawarbarcouncil.com

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

In Service Appeal Javed vs. PO-KP etc.

I/WE, Javed Appellant,

hereby appoint, Mr. Muhammad Ismail Alizai, Advocate High Court,
Advocate High Court, D.I. Khan,

in the above mentioned matter / case and authorize him/ them to do all or any of the following acts,
in my/ our name and on my/ our behalf, that is to say,

1. To appear, act and plead for me/ us in the above mentioned case in this Court/ tribunal in which the same may be tried or heard or any other proceedings what so ever, ancillary thereto, including appeal, revision etc; on payment of fees separately for each court by me / us,
2. To sign, verify, file, present or withdraw all/ any proceedings, petitions, appeals, cross objections and application for compromise or withdrawal, or for submission to arbitration of the said case or any other documents, as may be deemed necessary or advisable by him/ them and to conduct prosecution or defense of the said case at all its stages,
3. To undertake execution proceedings, deposit, draw and receive money, cheques, cash and grant receipts thereof and to do all other acts and things which may be conferred to be done for the progress and in the course of prosecution of the said case,
4. To appoint and instruct any other Advocate/ legal practitioner authorizing him to exercise the power and authority conferred upon the advocate whenever he/ they may think fit to do so and to sign Power of Attorney on our behalf,

I / we, the undersigned do hereby agree to ratify and confirm all acts done by the advocate or his authorized substitute in the matter as my / our own acts, as if done by me/ us to intents and purposes, and I / we undertake that I / we or my/ our duly authorized agent shall appear in the court on all hearings and will inform the advocate(s) for appearance when case is called and I/ we the undersigned agree hereby not to hold the advocate(s) or his/ their substitute responsible if the said case be proceeded ex-parte or dismissed in default in consequence of my/ our absence from court when it is called for hearing and for the result of the said case, the adjournment costs whenever ordered by the court shall be of the advocate(s) which he/ they may receive and retain himself/ themselves. I/ we the undersigned do hereby agree that in the event of the whole or part of the fees agreed by me/ us to be paid to the advocate(s), if remain unpaid, he/ they shall be entitled to withdraw from prosecution of the above said case until the same is paid and fee settled is only for the above said case and above court and I / we agree hereby that once fee is paid, I/ we shall not be entitled for refund of the same in any case whatsoever.

IN WITNESS WHEREOF, I / we do hereby set my/ our hand to these presents, the contents of which have been read / read over, explained fully and understood by me/ us on this... 25 Day of Jun 2024.

Accepted By: Muhammad Ismail Alizai,
Advocate High Court.

Thumb Impression / Signature(s) of Executant(s)




2471-6322752-7

FORM OF ORDER SHEET

Court of _____

Appeal No. 198/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	26/01/2024	<p>The appeal of Mr. Javed presented today by him. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____.</p> <p>By the order of Chairman  REGISTRAR</p>

GOVERNMENT OF KHYBER PAKHTUNKHWA
POLICE DEPARTMENT SWTD

(2)



NAME
Javed
Rank
Constable



Roll No
3662

درخواست برائے: حصول گندہ سمرات ٹاشننگ کارڈ
درخواست کی تاریخ: ایگریگیشن
ٹاشننگ کارڈ نمبر: 21701-6322752-7
تاریخ: 17-01-2024
وقت: 01:21:03 pm
طریقہ ادائیگی: cash
درخواست نمبر: 2,500.00
سروس نمبر: 0.00

کل رقم ادائیگی: 2,500.00

سزز صارفین: نادرا سٹاف کے رویے کی شکایت کی صورت
میں مندرجہ ذیل ویب سائٹ پر رجسٹر کریں۔
<https://complaints.nadra.gov.pk>
اپنی درخواست کی موجودہ صورتحال جاننے کیلئے بینک آف
ڈی 8400 پر ایس ایم ایس کریں۔ اپنا 277 روپے +
ٹیکس مزید معلومات کیلئے ہیلپ لائن نمبر
1777 (051-111-786-100) پر رابطہ کریں

3

BEFORE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No: 198 /2024.

Muhammad Javed, Ex-PC No.3662.

Appellant.

Versus

Prov: Police Officer, Khyber Pakhtunkhwa, and others.

Respondents.

Service Appeal

I N D E X

<u>S.No.</u>	<u>Description of Documents</u>	<u>Annexure</u>	<u>Page(s)</u>
	Opening Sheet etc.	—	01
1.	Petition with Grounds of Appeal & affidavit.	—	02 — 06
2.	Application for condonation of delay.	—	07 — 28
3.	Copy of Order of DPO/SWTD, Wana	A	09 — 15
4.	Copy of Deptl: Appeal / order	B & C	16 — 18
5.	Copy of order of PPO/KP	D	— 19
6.	Vakalat-Nama	—	— 20

Dated: 25.01.2024.



(Muhammad Javed) Ex Constl; Appellant
Through Counsel

(Signature)
(Muhammad Ishaq Afizai)
Advocate High Court, Dikhan.

BEFORE SERVICE TRIBUNAL, KHY: PAKHTUNKHWA, PESHAWAR.

Service Appeal No: 198 /2024.

Javed s/o Bajcy Gul
 Ex-Police Constable No.3662,
 Office of DPO / South Waziristan Tribal District Wana.
 Presently, R/O Village Angoor Adda,
 Tehsil Birmal, District South Waziristan.
 Cell No. 0302-583-0995.

(Appellant)

Versus

1. (The Provincial Police Officer (IGP), Khyber Pakhtunkhwa,
Central Police Office, Peshawar.
2. Regional Police Officer, D.I.Khan Range, D.I.Khan.
3. DPO, South Waziristan Tribal District. Wana.

(Respondents)

434 of KPST Act 1974

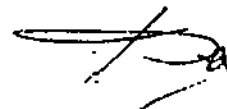
SERVICE APPEAL AGAINST (1) ORDER DTD 08.05.2023 WHEREBY THE APPELLANT IS AWARDED PUNISHMENT BY RESPDT: NO. 3 OF DISMISSAL FROM SERVICE (2) ORDER DTD. 01.12.2023 OF RESPONDENT NO.2 WHEREBY DEPARTMENTAL APPEAL WAS REJECTED AND FINALLY FROM ORDER DTD. 22.12.2023 (RECEIVED ON 04.01.2024 PASSED BY RESPONDENT NO.1.

Respectfully Sheweth: -

The appellant very humbly submits as under: -

BRIEF FACTS:

1. That the petitioner was inducted in Police Department as Constable and posted at South Waziristan Tribal District.
2. That the petitioner had since his induction in Police Department been serving under Respondent No.3 while Respondent No.2 is the appellate authority and Respondent No.1 commands overall authority in respect of the parties, thus all are necessary party to the lis.
3. That the appellant always striven hard to discharge and fulfill the duties and tasks assigned with due diligence and dedication. Service record of the appellant is otherwise unblemished, clean and devoid of any adverse marking since nothing of the sort had ever been conveyed to the appellant in this respect.
4. That during the year 2023, the appellant was subjected to departmental proceedings on allegation of being absent from duty w.e.f. 02.01.2023 and a Show Cause Notice was allegedly issued to the stated effect. The proceedings culminated in award of title mentioned punishment though the appellant having been denied due process had been provided no opportunity to attend proceedings and defend himself. Copy of order pertaining award of punishment is placed herewith at Annex A.



5. That as a matter of fact the appellant had never been absent but for some clerical mistake he was marked absent besides a large number of other employees thus causing err in handling of matter by the dealing hands. The appellant was never informed not conveyed any official communiqué about he being absent.
6. That on gaining knowledge of the award of punishment and aggrieved from the order of the departmental authority the appellant moved an appeal with respondent No.2 and thus seeking reinstatement in service which however, could not find favour with appellate authority and was dismissed / rejected vide order dated 01.12.2023 vide No.9505/EC. Copies of Departmental Appeal & Order passed thereon are placed as Annex; B & C, respectively. It is however, worth mentioning that the order on award of punishment i.e. Annex-A was never conveyed / communicated to the appellant and a copy thereof could only be obtained through personal source where after departmental appeal was preferred without delay on 14.09.2023 thus the departmental appeal was well within time frame of limitation yet knocked out by the appellate authority on technical ground.
7. That aggrieved of finding no justice from the authorities below, the appellant preferred a revision petition with the provincial Police Officer, (Resdt; No.1). The same, however, stood dismissed yet against the true facts and the statutory provisions. Copy of order passed by PPO/KP is placed at Annex-D. Hence, the instant appeal on the grounds, inter-alia, as under,

Grounds:

1. That the order passed by departmental authority i.e Respd: No.3, besides the orders passed by appellate authorities, as impugned hereby, are discriminatory, arbitrary in nature, legally and factually incorrect, ultra-vires, void ab-initio against the rights of the appellant and militates against the principles of natural justice thus are liable to be set-aside and nullified.
2. That the appellant is innocent and has been subjected to the penalty, most harsh in nature for no fault on his part. Respondent No.3 failed to regulate the departmental inquiry in accordance with the law & procedures prescribed for the purpose and as such erred at the very out set of the proceedings thus causing grave miscarriage of justice as well as prejudice to the appellant in making his defense.
3. That it is a matter of record that the appellant has been vexed in clear defiance of the law and principles laid by the superior courts as well as the Tribunals as could be gathered from the facts and circumstances of the case.
4. That the respondents while adjudicating in the matter of departmental proceedings and the departmental appeal besides revision petition, disposed off the entire matter in a slipshod manner through the orders impugned hereby and even failed to decide it in accordance with the principals of natural justice, thus the award of impugned punishment is patently unwarranted, illegal, ultra-vires, nullity in law and apparently motivated for extraneous reasons and thus is neither sustainable nor maintainable in law.
5. That the appellant has sufficient length of service rendered for the department. While adjudicating in the matter the departmental authorities utterly ignored not only the provisions of law on the point but the rights, too, of the appellant including fringe benefits and by imposing the penalty in defiance of law as aforesaid, deprived the entire family of the appellant of its only source of making the two ends meet.
6. That the order passed by respondent No.3 on holding of departmental proceedings including the order on award of punishment as well as the rejection of the departmental



appeal and revision petition, as impugned hereby, have infringed the rights and have caused grave miscarriage of justice to the appellant without any lawful excuse.

- 7. That while ignoring the rights of the appellant guaranteed by the constitution, the departmental authorities / respondents utterly failed to adopt a proper course & follow due procedure hence erred in disposal of the matter in accordance with the law and rules. The impugned order passed by Respondent No.3 and rejection of departmental appeal and revision by Respondents No.2 and 1, respectively, on mere technicality thus lack in legal sanction and therefore, both orders are liable to be set aside in the interest of justice.
- 8. That the petition of appeal / appellant is duly supported by law and rules formulated thereunder, besides the affirmation / affidavit annexed hereto.
- 9. That this Hon'ble Tribunal is competent and has ample powers to adjudge the matter under reference/appeal.
- 10. That the counsel for the appellant may very graciously be allowed to add to the grounds during the course of arguments, if need be.

Prayer:

In view of the fore mentioned submissions, it is very humbly requested that the impugned order dated 08.05.2023 passed by DPO/SWTD, besides the order dated 01.12.2023 of Respondent No.2 and order dated 22.12.2023 (received on 04.01.2024) may, on being declared as illegal, arbitrary, discriminatory, void ab-initio, ineffective and inoperable against the appellant, be very graciously set aside and the appellant may in consequence thereof be very kindly reinstated in service with allowance of all back benefits. Grant of any other relief including costs, as may be deemed appropriate by the Hon'ble Tribunal is solicited, too.

Dated: 25.01.2024

Humble Appellant,



(Muhammad Javed) Ex; Constl./Appellant,

Through Counsel.

(Signature)
(Muhammad Ismail Alizai)
Advocate High Court.

AFFIDAVIT:

Dated: 25.01.2024.

I, Muhammad Javed, the appellant, hereby solemnly affirm and declare on oath that contents of the petition are true and correct to the best of my knowledge, belief and per the official records. Also, that nothing is willfully kept or concealed from this Hon'ble Tribunal.



Deponent.

CNIC# 21701-6322752-7

(Signature)
Attested
25/1/24

(2)

BEFORE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

CMA No.

In: Service Appeal No. _____ /2024.

Muhammad Javed, Ex-PC No.3662.

Appellant.

Versus:

Provl: Police Officer, Khyber Pakhtunkhwa, and others.

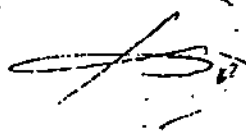
Respondents.

Service Appeal

Application Seeking Condonation of Delay.

Respectfully Stated:-

1. That the petitioner has moved a service appeal before this Hon'ble Tribunal impugning the order of his dismissal and final order thereon, contents whereof may kindly be read in conjuncture with the instant application.
2. That it was due to circumstances beyond control of the petitioner / appellant, primarily because of the acts & omissions on part of respondents, that the petition of Departmental Appeal could not be filed earlier as explained in main petition of appeal, for which the petitioner / appellant cannot be held responsible.
3. That the petitioner / appellant has a good, prima-facie case to his credit and is in genuine expectation of its success on merit.
4. That the Apex Court of the country has time and again pronounced that a case cannot be dismissed on technical grounds, including delay if the relief sought is justified in law and on facts.
5. That this Hon'ble Tribunal has ample powers to condone delay, if any, for the advancement of and in larger interest of justice.



②

Prayer:-

It is therefore, humbly requested that the application under review may kindly be accepted and delay, if any in filing of the appeal may kindly be condoned in the interest of justice.

Humble Petitioner,

Dated. 25.01.2024



(Muhammad Javed)
Ex-PC No.3662/SWT District.

AFFIDAVIT:

I, Muhammad Javed, the appellant, hereby solemnly affirm and declare on oath that contents of the petition are true and correct to the best of my knowledge, belief and per the official records. Also, that nothing is willfully kept or concealed from this Hon'ble Tribunal.

Dated: 25.01.2024.

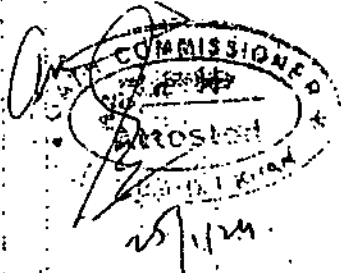


Deponent. CNV/21701-6322752-

Mugh Counsel

M. Ishaq

Muhammad Ismail Akza
Advocate-High Court
Dera Ismail Khan



(9)

"A"

OFFICE OF THE
DISTRICT POLICE OFFICER,
SOUTH WAZIRISTAN TRIBAL DISTRICT.


CHARGE SHEET


I Shabir Hussain Marwat District Police Officer, South Waziristan as
Competent Authority, hereby charged you Constable Javed No.3662 of SWTD Police as
follows:-

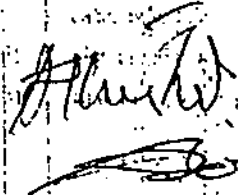
- i. As per D.D No.15 report dated 02.01.2023 Police Line SWTD. You have
been absented from 02.01.2023 to till date without prior permission/approval
from the high ups.
- ii. Being a part of uniformed force your this act shows gross misconduct on
your part.

By reason of the above, you appear to be guilty of misconduct under Police
Disciplinary Rules, 1975 with amendments 2014 and have rendered yourself liable to all or any
of the penalties specified in the Rules:-

- 2) You are, therefore required to submit your written defense within 7 days of the receipt of
this Charge Sheet to the Enquiry Officer as the case may be.
- 3) Your written defense, if any, should reach to the Enquiry Officer within the specified
period failing which it shall be presumed that you have no defense to put in and in that
case, ex parte action will be taken against you.
- 4) You are also at liberty, if you wish to be heard in person.
- 5) Statement of allegation is enclosed.


Shabir Hussain Marwat
District Police Officer,
South Waziristan Tribal District.




Muhammad Ismail Alizai
Advocate High Court
Dera Ismail Khan

Muhammad Ismail Alizai
Advocate High Court
Dera Ismail Khan

Muhammad Ismail Alizai
Advocate High Court
Dera Ismail Khan

SUMMARY OF ALLEGATIONS

1). I, Shabir Hussain Marwat, District Police Officer, South Waziristan Tribal District, am of the opinion that Constable Javed No.3662 of district SWTD has rendered himself liable to be proceeded against as he committed the following acts/omissions within the meaning of Police Disciplinary Rules, 1975 read with Amendments 2014.

STATEMENT OF ALLEGATIONS.

- iii. As per D.D No.15 report dated 02.01.2023 Police Line SWTD: You have been absented from 02.01.2023 to till date without prior permission/approval from the high ups.
- iv. Being a part of uniformed force this act shows gross misconduct on his part.

2). For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations, SDPO HQs Noor Khan is appointed as Enquiry Officer, to conduct enquiry under the Rules.

3). The Enquiry Officer shall, in accordance with the provision of the Police Disciplinary Rules, 1975 read with Amendments 2014 provide reasonable opportunity of hearing to the accused, record its findings and make within 15 days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused.

District Police Officer,
South Waziristan Tribal District.

No. 195-196 /SWTD

Dated

the 21/02/2023.

Copy of above is forwarded to the:-

- 1. Enquiry Officer of this district is directed to initiate departmental proceedings against the accused under the Police Disciplinary Rules, 1975 read with Amendments 2014.
- 2. Constable Javed No.3662 to appear before the Enquiry Officer on the date time and place fixed by the Enquiry Officer for the purpose of enquiry proceedings.

Shabir Hussain Marwat
District Police Officer,
South Waziristan Tribal District.

Muhammad Ismail Aitza
Advocate High Court
Dera Ismail Khan

Muhammad Ismail Aitza
Advocate High Court
Dera Ismail Khan

Muhammad Ismail Aitza
Dera Ismail Khan
2023

اردنیٹر / DSP / سرکاری / نوٹس / SWAD

ذیل ملازمتوں کے لیے نوٹس جاری کیا گیا ہے جو کہ وہ ایسی جارج سٹیٹ کی کامی دہن کے لیے سے دوسری کر کے جوا - جارج سٹیٹ ایئر سٹیٹ کیوں کر کے دوسری کر کے پیش کریں ضروری ہے

ردیف	نام ملازم	نمبر	نام ملازم	نمبر
1	سید ابراہیم	3860	عزت علی	3694
2	سید ابراہیم	3141	عزت علی	3493
3	سید ابراہیم	4008	عزت علی	3661
4	سید ابراہیم	319	عزت علی	3674
5	سید ابراہیم	411	عزت علی	3662
6	سید ابراہیم	1032	عزت علی	1989
7	سید ابراہیم	687	عزت علی	2364
8	سید ابراہیم	328	عزت علی	3738
9	سید ابراہیم	1073	عزت علی	3781
10	سید ابراہیم	4512	عزت علی	3860
11	سید ابراہیم	1078	عزت علی	3421
12	سید ابراہیم	377	عزت علی	3743
13	سید ابراہیم	345	عزت علی	3774
14	سید ابراہیم	1019	عزت علی	3712
15	سید ابراہیم	1077	عزت علی	3794
16	سید ابراہیم	1207	عزت علی	3804
17	سید ابراہیم	1986	عزت علی	3804
18	سید ابراہیم	1940	عزت علی	3804
19	سید ابراہیم	1617	عزت علی	3804
20	سید ابراہیم	1853	عزت علی	3804
21	سید ابراہیم	3413	عزت علی	3804
22	سید ابراہیم	3395	عزت علی	3804
23	سید ابراہیم	3383	عزت علی	3804
24	سید ابراہیم	3346	عزت علی	3804
25	سید ابراہیم	3263	عزت علی	3804
26	سید ابراہیم	3242	عزت علی	3804
27	سید ابراہیم	3222	عزت علی	3804
28	سید ابراہیم	3151	عزت علی	3804
29	سید ابراہیم	2503	عزت علی	3804
30	سید ابراہیم	2796	عزت علی	3804
31	سید ابراہیم	2838	عزت علی	3804
32	سید ابراہیم	3101	عزت علی	3804
33	سید ابراہیم	3019	عزت علی	3804

Muhammad Ismail Nizami
Advocate High Court
Dera Ismail Khan

(Handwritten signature)

Muhammad Ismail Alizai
 Advocate High Court
 Dera Ismail Khan

جوائب DSP/HQ

جوائب 40% پولیس لائن ایڈمنسٹریشن، آل قاضیات ایڈمنسٹریشن
 ذیل درجہ ذیل پولیس کو مطلع کریں کہ وہ اپنی چارج شیٹ کی کاپی اپنے چارج
 عتاق ٹانگ سے حاصل کر کے مندرجہ ذیل ایڈمنسٹریشن چارج شیٹ لاکر پیش کریں
 ایک مرتبہ پورے جوائب آئیڈر پر رجسٹر کر کے وسیع طور پر کیا گیا ہے۔ چند ایڈمنسٹریشن کے
 علاوہ بنایا گیا ہے۔ ایڈمنسٹریشن کے چارج شیٹ وصول نہیں کیا ہے۔ بصورت دیگر
 پندرہ کارڈوں کی عمل میں لائی جا رہی ہے۔

جوائب	پلاٹوں	جوائب	لائسنس ٹانگ	پولیس لائن ٹانگ
زاہد اللہ 3104 بریلی	I-P 2586 حسن یار	نیک رحمان 3380 جالیز	3674 - سید عیوب	3860 - سید عیوب
رحمت اللہ 2377 بلوچ	13-P 3740 قتل عثمان	آرمیٹ علی 3146	3662 - جاوید	4038 - جاوید
محمد اکبر 3801 سرارہ	6 P 3808 بنت اللہ	عثمان اللہ 3559 قلعین	1989 - عالی عثمان	319 - ذبیح اللہ
شیر اللہ 4317	7 P 2457 جن ناز خان لرحا	عظیم خان 4552 لرحا	3664 - شرف	491 - شیر اللہ
عقلمند 4030 تیارہ	14 P 3750 ارمیٹ علی	ساجد الدین 4256 سرورہ	3738 - عبدالنور	687 - احسان اللہ
راہیم اللہ 3950 مکتب	14 P 3629 افتاب	ذین القادری 4 مکتب	3731 - محمد شمیم	338 - امیر اللہ
احمد علی 4001	14 P 3793 افضل	اسحاق علی 4552 سرورہ	3421 - عارف نواز	1073 - محمد عثمان
عثمان 3936	16 P 3813 لقب اللہ		3743 - واعظ اللہ	4512 - زراخت اللہ
محمد زاہد 3207	16 P 3237 عابد اللہ		3774 - سید اللہ	377 - محمد زاہد
نور افضل 4444	15 P 3194 محمد رفیع		3792 - ارباب	1174 - ایمان ذبیح
اسد اللہ 2493 قلعین	5 P 2687 عبد الرحمن		3794 - نیاز اللہ	1099 - اہلسنت خان
ذکر اللہ 3589 چنگدلی	5 P 2619 عابد اللہ		3804 - شریان	1209 - شاہنجر
نذیر اللہ 334 سرورہ	5 P 3040 صنعت اللہ		3840 - ذاکر اللہ	1986 - سید شعل
محمد زاہد 6 مکتب	6 P 2039 خان بادشاہ		3840 - ذاکر اللہ	1617 - ملک اللہ
فضل 4019 مکتب	3736 نور احمد		4014 - ذین اللہ	1853 - احسان اللہ
محمد زاہد 4429 لرحا	5 P 2596 محمد عثمان		2487 - عبدالرحیم	3413 - اسحاق خان
محمد زاہد 1158 سرورہ	4 P 3051 فضل الرحمن		4013 - افتاب احمد	3395 - محمد شرف
سید احمد 4050 قلعین	4 P 2682 اللہ نور		3991 - شاہ فیصل	3383 - شیا ننگر خان
فضل الرحمان 3457 سرورہ	11 P 3443 محمد رشاد		3938 - فواد خان	3346 - واہد اللہ
محمد حسین 2364 سرورہ	8 P 3013 محمد وارث		3935 - علی عثمان	3263 - اتیب رحمان
ذکر اللہ 1752	7 P 3222 سید بادشاہ		3953 - عباس خان	3242 - ذریب اللہ
	10 P 3058 کریم اللہ		3902 - وزیر	3124 - نور کلام خان
	9 P 3573 سید علی		4021 - علی شرف	3151 - رباب خان
	9 P 3570 انجمن احمد		4053 - ارشد اللہ	2503 - نور دین
	8 P 3490 اعجاز		2796 - محمد حسین	2838 - محمد زاہد
			4043 - محمد شفیق	3101 - حاجت اللہ
			4013 - نیاز احمد	3019 - عزیز اللہ
			2787 - عزیز اللہ	3493 - حسن شاہ
			2047 - محمد دین	3661 - حضرت محمد
			3193 - محمد خان	4322 - انار گل

DSP HQ
 Dist: SWTD
 31-3-23

Muhammad Ismail Alizai
 Advocate High Court
 Dera Ismail Khan

(NASIR MUHAMMUD BATTI) PSP
 Regional Police Officer
 Dera Ismail Khan

کچھ روز قبل Rps سہ ماہی ڈاک

عنوان: درخواست طہر اور نوکری پر بحال

مذہب: عالی

گزارش واپس فروری بحسب کنسل ڈاک کی ورنہ پولیس لائن میں ڈیوٹی
 سربراہان کے راجہ راجہ فروری کو بحوالہ نہ کیا عرض 20/02/23 کو پولیس لائن
 میں ٹانگ سے غیر حاضر آیا گیا تھا (Communication) قسم نہ ہوتے 3
 سے فروری کو بائٹ غیر بائٹ (اطلاع لیں ملی ہے اس دوران
 فروری کو (Dismiss) کیا گیا ہے عرض ہیک فروری غیر آدھی
 ہے تھوہ پر گنریٹوی افراد بائٹ ہیکل ہورائے تا ہے محض بائٹ ہورائے
 نوکری پر بحال کیا جائے آئندہ کئی ڈیوٹی کا پاسز ہونے کا

Arrest

العارہ

14/02/23 عرض

3662 مسائل کنسل جاوہر



0302-5830995
- 0303-9296723

Alizai
 Muhammad Ismail Alizai
 Advocate High Court
 Dera Ismail Khan

شناختی کارڈ نمبر
 21701-6328752-7

17




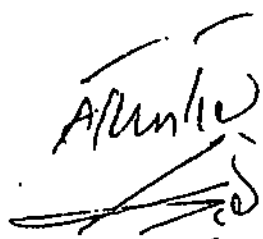
OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION

No. 1150/RS DI Khan the Dated 18/09/2023
To The District Police Officer,
SW Upper, Lower

Subject: APPLICATION
Memorandum

An application preferred by Ex-Constable Javed No 3662, is sent herewith for comments, with the directions to return the same to this office alongwith complete service documents, of the appellant within 05-days to proceed further into the matter, please.


Regional Police Officer,
Dera Ismail Khan
1578


Muhammad Usail Aizai
Advocate High Court
Dera Ismail Khan





Advocate High Court
Dera Ismail Khan

محفوظ رہنا آئی جی ہا۔ غیر مستوفرا

۵۹

عنوان درخاست ہمداد نوری پر عالی!

خواب عالی!

تذکرہ میں ہے کہ فدوی بحیثیت کنسٹیبل Swat واما پولیس لائن میں
ڈیوٹی سے ریٹائر ہوا۔ فدوی کو مجرم صدر ۱۵ فورس ۵۲/۵۱ کو پولیس
لائن Swat پر کام ٹانڈ سے غیر حاضر کیا گیا تھا۔ کمیونٹیشن سسٹم
پر سونے کی وجہ سے فدوی کمر بابت غیر حاضری اطلاع نہیں مل سکی
اس دوران فدوی کو ڈس مین کیا گیا ہے۔ عرض صدیقہ فدوی اپنی
غریب ادوی ہے۔ تنخواہ پر گریجویٹ انفرمیشن ٹورنٹو ہے
صبر بانی زیار نوری پر بحال کیا جائے۔ اشدہ سے ڈیوٹی کا مابعد حکم

الگارسی

سائیکالائٹس ہارنر 3662

۵۸۳۰۹۹۵-۵۳۰۲

۹۲۹۶۷۲۳-۵۳۰۳

۲۱۷۵۱-۶۳۲۲۷۵۲-۷

Attest

12



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

No. 2109 /Legal SAC dated the 17/05/2024

To: The District Police Officer,
South Waziristan.

Subject: SERVICE APPEAL NO. 198/2024 JAVED VS IGP KP

Memo:-

Please refer to your office letter No. 1301 dated 15.05.2024 on the subject noted above.

2. The Para-wise comments in the subject service appeal received to CPO for favor of signature of W/IGP Khyber Pakhtunkhwa are hereby returned with remarks that the comments are insufficient, reply to each para may be explained with supporting annexures and resubmit the same for further necessary action, please.

Encl: complete file of your office

DSP/LEGAL

For Assistant Inspector General of Police,
Legal, Khyber Pakhtunkhwa, Peshawar
17.05.2024



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

No. 2681 /Legal SAC dated the 01/07/2024

To: The District Police Officer,
South Waziristan.

Subject: SERVICE APPEAL NO. 198/2024 JAVED VS IGP KP

Memo:-
Please refer to your office letter No. 1187 dated 28.06.2024 on the subject noted above.

2. The Para-wise comments in the subject service appeal received to CPO for favor of signature of W/IGP Khyber Pakhtunkhwa are hereby returned with remarks that Para No. 5 of comments is having grammatical mistakes, the same may be corrected and resubmit the same for further necessary action, please.

Encl: complete file of your office

SP/LEGAL

For Assistant Inspector General of Police,
Legal, Khyber Pakhtunkhwa, Peshawar

01.07.2024