

13.09.2022

SCANNED  
KPST  
Peshawar

The worthy Chairman is on leave, therefore, the case is adjourned to 01.11.2022 for the same.



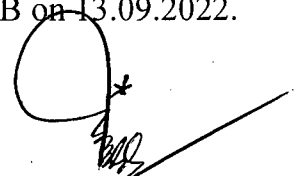
  
Reader

Form- A

# FORM OF ORDER SHEET

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

Case No.- 1082/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/07/2022	<p>The appeal of Mr. Zahirullah Khan presented today by Mr. Muhammad Irshad Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	4.7.22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>13.7.2022</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
	13.07.2022	<p>Mr. Muhammad Irshad Mohmand, Advocate for the appellant present. Preliminary arguments heard.</p> <p>Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 13.09.2022.</p> <p> (Mian Muhammad) Member (E)</p>

Rs-500/-  
Appellate Court Peshawar  
Security & Process Fee  
A. J. J. / 13/7/22

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No. 1082 / 2022

RECEIVED  
13/06/2022  
Khyber Pakhtunkhwa  
Service Tribunal Peshawar

Zahir Ullah Khan (Constable, Belt No 2967)

(Appellant)

Versus

Provincial Police Officer / IG Khyber Pakhtunkhwa & Others

(Respondent)

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2	Address of Parties		8
3	Copy of absorption order dated 23-07-2020	"A"	9-11
4	Copy of Medical Certificate regarding fitness for training And Mad No. 21 dated 30-11-2021 & Mad No. 8 Roznamsha dated 30-11-2021 and Training completion certificate	"B"	12-16
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Appellant:-Zahir Ullah Khan  
Through

Muhammad Irshad Mohmand  
Advocate High Court

Sulaman Ali  
Advocate

①

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_-P/2022

Zahir Ullah Khan (Constable, Belt No.2967) Police Line at Ghalanai,  
Mohmand Tribal District (Appellant)

**Versus**

1. Provincial Police Officer / IG Khyber Pakhtunkhwa Peshawar
2. Regional Police Officer, Mardan
3. District Police Officer Mohmand Tribal District (Respondents)

**APPEAL UNDER SECTION 4 OF THE KHYBER  
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974  
AGAINST THE APPELLATE ORDER DATED 13/06/2022 OF  
RESPONDENT NO.2 / REGIONAL POLICE OFFICER  
MARDAN WHEREBY THE DEPARTMENTAL APPEAL OF  
THE APPELLANT WAS DISMISSED AND THE INITIAL  
ORDER OF MAJOR PUNISHMENT OF DISMISSAL OF THE  
APPELLANT FROM SERVICE VIDE DATED 21/12/2021  
PASSED BY THE RESPONDENT NO.3 / DPO MOHMAND  
WAS MAINTAINED**

---

**PRAYER**

*On acceptance of this Service appeal, both the  
impugned Appellate order dated 13-06-2022 of  
Respondent No 2 as well as initial order dated  
21/12/2021 of Respondent No 3 respectively be set  
aside being illegal and against the law, and the  
Appellant be reinstated to his service along with all  
back benefits.*

2

Respectfully Sheweth:-

That the appellant submits as under;

1. That the Appellant was initially appointed as Khasadar Levy in the year 2009 and after the merger of FATA into Khyber Pakhtunkhwa / Settled Area, the Appellant was absorbed as constable into Police Service vide Order dated 23-07-2020 (**Copy of absorption order dated 23-07-2020 is attach as Annex "A"**).
2. That thereafter the appellant was selected for police training and in this respect medical certificate regarding physically fitness was also issued to the appellant vide dated 11-11-2021 and the appellant was sent to Police Training Center Shakas by the concerned Respondent vide Mad No 21 dated 30-11-2021 issued from Police line District Mohmand and the same was duly received at Shah Kas Training Center at Distt. Khyber vide Naqal Mad No 8 Roznamcha dated 30-11-2021 and the Appellant duly joined and completed his training. (**Copy of Medical Certificate regarding fitness for training And Mad No. 21 dated 30-11-2021 & Mad No. 8 Roznamsha dated 30-11-2021 and Training completion certificate are attach as Annex "B"**)
3. That as such the appellant was busy in completion of his training, as the same is already clear from the training certificate but surprisingly the Respondent No 3 awarded major punishment of Dismissal from service to the appellant on the allegation of non reporting for training vide impugned office order dated 21-12-2021 issued by the Respondent No 3 / DPO Mohmand without conducting any detail inquiry and without fulfilling the legal requirement, despite the fact that the Appellant was busy in his training and the impugned order

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was also not conveyed to the appellate. **(Copy of Impugned Orders dated 21-12-2021 issued by Respondent No 3 / DPO is attach as Annex "C")**.

4. That thereafter the appellant preferred departmental appeal against the dismissal order before the Respondent No.2 which was dismissed without adverting to other facts & grounds vide order dated 13/06/2022, it is pertinent to mention here that while deciding the appeal of the appellant, the appellate authority made observation regarding absentee from duty, but in the initial order, the allegation leveled against the appellant was of non reporting for training, **(Copy of Departmental Appeal & Appellate Order dated 13/06/2022 is attached as Annexure "D ")**
5. That the appellant being aggrieved from the impugned Appellate order as well as initial order respectively dated 13/06/2022 & 21/12/2021 prefer this Appeal before this Honorable Tribunal on the following grounds:-

**GROUND:**

- A. That both the impugned orders of Respondents No 2 & 3 respectively regarding the dismissal of Appellant from service is totally illegal, against the law and rules and similarly the appellate authority also failed to exercise its authority properly and legally in the matter of dismissal of Departmental Appeal of the Appellant.
- B. That from the available record it is clear that the Appellant was present in his training, but the Respondent issued the impugned order without conducting proper inquiry in case of the Appellant, what to speak of inquiry, even all the proceedings were carried out on the back of Appellant,

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therefore both the impugned orders of Respondents No.2 & 3 are in violation of law & rules.

- C. That the allegation leveled against the appellant by Respondent No 3 was regarding non reporting for training while deciding the appeal of the appellant, the appellate authority made some other observation of absentee from duty without adverting to the fact and record of the case, therefore the both the initial and appellate impugned order of Respondents are not based on any legal and properly proof, and liable to be set aside.
- D. That no information by the competent authority has been given to the Appellant by the Respondents regarding the inquiry, neither the inquiry officer has summoned the Appellant for appearance or asked the appellant to face the charge leveled against the appellant, therefore the alleged inquiry is an ex-parte and on the back of the appellant, therefore the same has no legal sanctity under the law.
- E. That after conducting the alleged inquiry & finding rendered by the inquiry officer no final show cause notice has been served on the appellant by the Respondents, which is also violation of law / justice and rules, therefore the impugned initial orders of respondents as well as appellate order are not sustainable.
- F. That the departmental appeal of the appellant was also dismissed by the appellate authority in disregard of law and record available on file and without calling and hearing of the appellant in his defense, therefore the impugned orders of appellate authority is also suffered from legal infirmity and amounts to condemned unheard the appellant which is against the natural justice.

5

- G. That the appellant has served the police department for sufficient time and in this period none of his superiors had ever made any complaint against the appellant, but the appellant had served the police force with great zeal and devotion, therefore the punishment imposed upon the appellant of dismissal from service is very much harsh and does not commensurate with the alleged charge of absentia, even the service rendered by the appellant is also mature for pension as the appellant before the absorption in police has served in Khasadar force from 2009.
- H. That according to the Report / letter submitted by the Director Police Training School Shakas, wherein it has been specifically mentioned that the appellant is under training, therefore all the allegations regarding the absence or non reporting for training are baseless and based on mala fide and having no cogent / authentic evidence.
- I. That it is also pertinent to mention here that the Police Force is an independent establishment and all the affairs of police force including disciplinary proceedings are regulated under the special law known as Police E & D Rules 1975 but the Respondent while dealing with the case of appellant, the Respondent dealt the case of appellant under the KPK E & Rules 2011, which is totally illegal and not relevant, and all the proceedings are illegal therefore not sustainable under the law.
- j. That under the law the appellant is entitled for each and every piece of evidence / order / documents and the respondents have no authority to refuse the appellant any documents as under Article 19-A of the Constitution the appellant has a right to information, which could not be



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refused but the Respondents with mala fide intention did not supplied the alleged inquiry as well as the alleged show cause notice and statement of allegations and other material relevant to the appellant's case, which further shows the mala fide intention of the Respondents.

- K. That any other ground will be raised at the time of final arguments with the permission of the court.

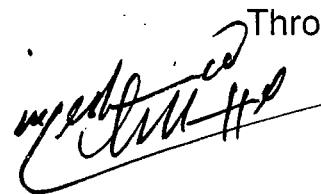
**Prayer:-**

It is, therefore humbly prayed that on acceptance of this Appeal both the impugned Appellate order dated 13-06-2022 of Respondent No. 2 and initial impugned order dated 21-12-2021 of Respondent No. 03, may kindly be set aside, being illegal, unlawful against the rules, and Appellant be reinstated into his service with all back benefits.

ذہیر اللہ خان

**Appellant:-**Zahir Ullah Khan

Through



Muhammad Irshad Mohmand

Advocate High Court



Sulaman Ali

Advocate

7

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_ -P/2022

Zahir Ullah Khan (Constable, Belt No.2967) (Appellant)

**Versus**

Provincial Police Officer / IG Khyber Pakhtunkhwa & Others  
(Respondent)

**AFFIDAVIT**

I, Zahir Ullah Khan (Constable, Belt No.2967) Police Line at Ghalanai, Mohmand Tribal District, do hereby solemnly affirm and declare on oath that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

DEPONENT

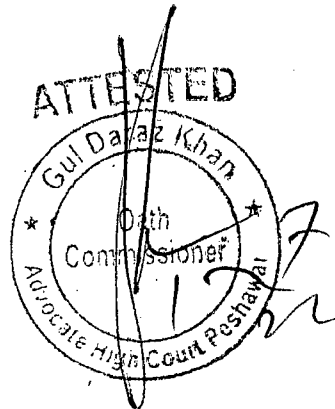
ذہر اہل خان

Identified by

*Muhammad Irshad Mohmand*

Muhammad Irshad Mohmand

Advocate High Court





**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_ -P/2022

Zahir Ullah Khan (Constable, Belt No 2967) (Appellant)

**Versus**

Provincial Police Officer / IG Khyber Pakhtunkhwa & Others

(Respondent)

**ADDRESSES OF PARTIES**

Zahir Ullah Khan (Constable, Belt No.2967) Police Line at Ghalanai,  
Mohmand Tribal District (Appellant)

**Versus**

1. Provincial Police Officer / IG Khyber Pakhtunkhwa Peshawar
2. Regional Police Officer, Mardan
3. District Police Officer Mohmand Tribal District at Ghalanai

(Respondents)

**Appellant:-Zahir Ullah Khan**

Through

Muhammad Irshad Mohmand  
Advocate High Court

Sulaman Ali  
Advocate

Office No. 86  
I.G.P. No. 52(2)

9

No. **2967** P.No-443236

District \_\_\_\_\_

# CHARACTER AND SERVICE ROLL OF

Amex "A"

Zahidullah s/o Nazir Khan

## CONTENTS

PARAS		PAGES
1-5	General particulars	1
6	Appointments, Promotions, Reduction, Discharges etc.	2
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16.	Leave, absence and breaks in service.	
17.	Record of posting of inspectors, Sub-Inspectors, Assistant Sub-Inspectors.	
18.	Statements of land held by Lower Sub-Ordinates Rules 14.23 (1).	
19.	Progress reports of Probationary Inspectors, Sub-Inspectors and Assistant Sub-Inspectors.	
20.	Medical History Sheet.	
21.	Leave Account of Constables and Head Constables.	
22.	Marking sheet in connection with promotions to the selection grade of Constables.	
23.	Health Certificate.	

Agree and of th the provi years from

Date \_\_\_\_\_

5. R  
Left

RESTRICTED

(10)

CHARACTER AND SERVICE ROLL OF

CONSTABULARY NO. ( ) in DISTRICT  
 CONSTABULARY NO. ( ) in DISTRICT  
 CONSTABULARY NO. ( ) in DISTRICT






1	Name	Father's Name	Tribe or Caste	Village or Town	Post and Telegraph Office	Police Station	District	Province	Date of Birth	Height	Chest Measurement	Date of Enrolment	Age on Enrolment	Distinctive Marks
	Zahir Ullah	Nasir Khan		Ambar 107K Chambati	E K K S Bawal	L. Mohamad	Mohamad	1971	1985	5.6	34-31	27/7/20	35	None
2.	Verification Roll No.		Dated		Received back and attached to the Fauji Misal									
3.	Government Service prior to present employment, which is approved for pension service,													
	Service or Department	Rank or Grade	Pay of last appointment	From	To	Period								
						Years	Month	Days						
4.	Cause of and character on discharge from above service.			Reference to orders approving above service for pension service in the Police Department.										

Agreement. — I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that section and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline and conduct are governed have been explained to me. I agree to serve faithfully under the provisions of the said Police Act and to obey all lawful orders issued to me by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have received a certificate of appointment issued under section 8 of the Police Act (V of 1861).

Date \_\_\_\_\_

Signature \_\_\_\_\_  
 District Police Office  
 Islamabad


5. Rolled Impression of fingers and thumb of left hand.

Left Little	Left Ring	Left Middle	Left Index	Left Thumb
				

ATTESTED

11

6. CHARACTER ROLL OF APPOINTMENTS, PROMOTIONS, REDUCTIONS, DISCHARGES, ETC. (Continued)

1 Appointment, promoted, suspended, reduced, discharged, dismissed, resigned or died.	2 To what grade and pay appointed, promoted or reduced.	3 Date	4 No. of District Order	5 Full Signature of Superintendent of Police
<p style="text-align: center;"><u>Absorption order</u></p> <p>Absorbed as Constable B.P.S 07 in Police</p> <p>Under notification no 50(Police) H.D./S.M.Y 2019</p> <p>Merged area 1035/1046 dated 23-07-2020</p> <p>and has pay fix 10990 P.M.W.E from 23-07-2020</p> <p style="text-align: center;">             District Police Officer,            Meerut         </p>				

CHARACT

N

9. NA

Wife: fa


Father: 0

Mother: 0

Brother: 0

Sister: 02

7. TRANSFERS BEYOND THE DISTRICT

1 Date	2 From	3 To	4 Authority for transfer
<p style="text-align: center;">  </p>			

Note: - Under

(12)

Annex "B"

**OFFICE OF THE MEDICAL SUPERINTENDENT**  
**DHO HOSPITAL GHALLANAI**  
**MOHMAND DISTRICT.**

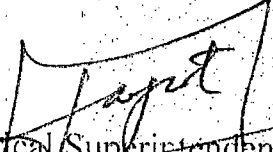
**MEDICAL /PHYSICALLY FITNESS CERTIFICATE**


No 105 /MS

Dated 11 /11/2021.

It is certified that I have examined Mr. Zahir ullah Khan S/O Mr. Nazar khan on dated 10/11/2021 bearing CNIC No. 21407-3309976-5

and found him medically & physically fit.

  
Medical Superintendent  
DHO Hospital Ghallanai.  
D.H.O Hospital Ghallanai  
Mohmand Tribal Distt



پولیس لائن


13

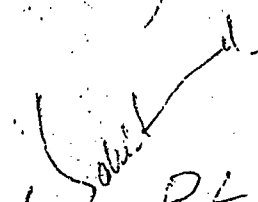
درآمد روایتی سپریم کورٹ آف ایسیا وقت 15-35 کے مورف 13-11 سے پیش کیا گیا ہے۔

محمد 1384، درخشاں 1560، دیباڑھان 1147، شاہ 1347، محمد 1506  
 عبدالرحمن 1861، محمد علی 2224، کوایت 2429، ناصر اللہ 2767، محمد 1506  
 محمد 2456، علی 1159، ساحر 2598، اسمان اللہ 2519، محمد 1867  
 محمد 175، شمس الزمان 2495، بوسید 278، سجاد علی 2174  
 ربیوار 2502، افتخار 2316، سراج 2957، عبدالرحمن 2342، طارق 1637، محمد 1506  
 حسن علی 1560، عبدالرحمن 1699، منصور 3043، سجاد علی 916، صالح اللہ 1506  
 محمد 2057، گل جاوید 2678، عابد اللہ 2564، عبدالرحمن 2178، سجاد علی 1506  
 نقل امین 1364، املی خان 2006، واجد علی 1423، محمد 2586، محمد 1506  
 بالاصحابانہ تین ماہ ٹریننگ سکول سرگودھا سے FTR سے پیش کیا گیا ہے۔  
 نینس اللہ شاہ کے ٹریننگ سکول سرگودھا سے پیش کیا گیا ہے۔

sir forwarded

ذیل کے افسران کے پاس

MHC P.L.O.M  


  
 LO-PL-M

RECEIVED



لتکلہ و لوز نا پیر 30/11/21

نیل

(14)

84 آرمڈ ریکروٹ فوسل خان 20 : وقت 18:00 صبح 30/11/21 درجہ اولیہ ریکروٹ ایئر ایئر 767  
تین ماہ ٹریننگ کیلئے مقرر ہیں انجنیئرمنٹ بیک کے ریکروٹ کر کے انجنیئر  
ہو جائیں گے۔

نقل بمطابق اصل ہے

PTs Shaka  
13-02-22

ریکروٹ ٹریننگ ایئر ایئر (2016) آرمڈ فو

30/11/21 کو 30/11/21 کو

9097/179  
19-11-21  
PTs Shaka

اردو ہفت روزہ نیا چتر شتالین  
ریکروٹ ٹریننگ ایئر ایئر

PTs Shaka

13/02/22

HARRAR  
Training School  
Gujranwala

TESTED



# POLICE TRAINING SCHOOL

## SHAKAS KHYBER

Reg: No B-212

**COURSE COMPLETION CERTIFICATE**  
Police Training (Newly Absorbed Strength Ex-NMDs)

ATTESTED


(15)

*This is to certified that*

Mr. Zahir Ullah Khan S/O Nagar Khan District Mohmand

**HAS PARTICIPATED AND SUCCESSFULLY COMPLETED**  
**THREE MONTHS BASIC POLICE TRAINING**

From 29<sup>th</sup> Nov - 2021 to 28<sup>th</sup> Feb - 2022

  
Director Police Training School  
Shakas Khyber

235  
1548

(16)

# POLICE TRAINING SCHOOL SHAKAS KHYBER

## PERFORMANCE REPORT


Starting Date : 29-11-2021      Ending Date : 28-02-2022  
 Name : Zahir Ullah Khan      F/Name : Nazar Khan  
 School Course : Recruit Course      Belt No : 2967  
 Education : Nil      District : Mohmand  
 Computer No : B-212      Merit : 86

Subjects	Marks Allotted	Total Marks	Subjects	Marks Allotted	Total Marks	Remarks
Paper - 1		50	Parade	22	50	<b>Declared Passed</b>
			PT	15	30	
Paper - 2		50	Anti-Riot/UA.	18	30	
			Naka Bandi	17	30	
Total		100	Raid	25	30	
			Sniper Fire	70	100	
			Assault Fire	115	130	
			DPA	48	80	
			<b>Total</b>	<b>330</b>	<b>480</b>	
<b>G. Total</b>		<b>330/480</b>	<b>Overall percentage is: 68.75</b>			

Leave availed: 02 Days    Medical/Rest: Nil    Absent: Nil    Punishment: Nil    Reward: Nil

Remarks: Good

Checked and found correct.

  
 In-charge Secrecy  
 Issue Date: 02-03-2022

Errors and omissions are accepted

**ATTESTED**

  
 Director  
 Police Training School



OFFICE OF THE  
DISTRICT POLICE OFFICER  
MOHMAND TRIBAL DISTRICT GHALLANAI

Email: dpomohmand@gmail.com  
Ph: 0924-290179 Fax: 0924-290056

(17)

Annex "C"

**ORDER:**

This order will dispose-off the inquiry proceeding against **FC Zahir Ullah N 2967** with the allegations that he was time and again directed via district control room to report at respective training center for basic training. But he turned deaf ear to the orders and failed to report at the training center. Moreover, the delinquent official reluctant to appear before the inquiry officer in connection with inquiry.

To scrutinize the conduct of the delinquent official, he was issued charge sheet together with statement of allegation & inquiry was entrusted to Mr. **Ayaz Khan** (DSP Upper) vide this office letter No.1088-1091/PA. The inquiry officer after fulfilling all legal and codal formalities, the alleged constable was found at fault however, recommended for **Major Punishment**.

Based on the above **I Salah-ud-Din Kundi, District Police Officer, Mohmand** being the competent authority and exercise of power vested in me under the Khyber Pakhtunkhwa, Government Servant (Efficiency & Discipline) rules 2011, hereby awarded him **Major Punishment of Dismissal from the service with immediate effect**.

District Police Officer  
Mohmand Tribal District

OB No. 1029

Dated: 21/12/2021

No. 3346 49/PA, dated Mohmand the: 21/12/2021

**Copy forwarded to the:**

- Regional Police Officer, Mardan for favor of kind information please.
- HC/EC/FMC
- Pay Officer

ATTESTED

**ATTACHED**

17-2-22  
DPO/204

10-02-22

RPO/Mohmand

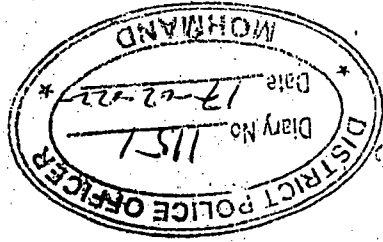
my

for comment

g/l logod

0300-5046699 - 0300

EC/PO Mohmand  
For Comments



(H/L)

10-02-2022

2967/2011/11-11-11

11-02-22

110-1215/ES

Handwritten text in Urdu script, appearing to be a list or report of names and details, possibly related to a recruitment or administrative process. The text is somewhat faint and difficult to read in many places.

Annex "D"

(18)

11/2/22

536

(19)

ORDER.

This order will dispose-off the departmental appeal preferred by Ex-Constable Zahir Ullah No. 2967 of Mohmand District against the order of District Police Officer, Mohmand, whereby he was awarded major punishment of dismissal from service vide OB: No. 1029 dated 21.12.2021 by the District Police Officer, Mohmand. The appellant was proceeded against departmentally on the allegations that he was selected for basic recruit course and in this regard he was time and again directed via District Control Room to report at respective training Centre for basic recruit training. But he turned a deaf ear to the orders and failed to report at the training center.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and Mr. Ayaz Khan Sub Divisional Police Officer, SDPO Upper Mohmand was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities submitted his findings wherein he reported that the defaulter Officer was contacted time and again to appear before the enquiry Officer, but he failed and remained absent, which showed that he was no more interested in Police Service. He recommended the delinquent Officer for ex-parte action.

Therefore, after perusal of enquiry papers and recommendations of the enquiry Officers the delinquent Officer was awarded major punishment of dismissal from service by the District Police Officer, Mohmand vide his office OB: No. 1029 21.12.2021.

Feeling aggrieved from the order of District Police Officer, Mohmand, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 21.04.2022.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt. As the appellant has bitterly failed to produce any cogent reason to justify his absence because the appellant got absorbed in Police Département on 23.07.2020 and due to non performance of duties his salary was stopped and enquiry was initiated on 24.06.2021. Moreover, it also came to light that the appellant was recruited against Shaheed quota did not perform duty but was regularly receiving the monthly salaries. Even after merger when he was absorbed in Khyber Pakhtunkhwa Police he did not bother to perform duty for a single day and remained absent up till 14.09.2021. An enquiry was started but he did not bother to

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join enquiry proceedings for the reasons that he had no cogent justification to produce in his defense. Hence, the absence period i.e. 01 year, 02 months & 01 day clearly depicts the casual and lethargic attitude towards his official duties as the very conduct of appellant is unbecoming of a disciplined Police Officer. Moreover, the appeal in hand is time barred by 21 days. Hence, order passed by the competent authority does not warrant any interference.

Keeping in view the above, I, Yaseen Farooq, PSP Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit as well as time barred by 21 days.

Order Announced.

  
Regional Police Officer,  
Mardan.

No. 1/168 /ES, Dated Mardan the 13 /06 /2022.

Copy forwarded to District Police Officer, Mohmand for information and necessary action w/r to his office Memo: No. 572/Legal dated 25.03.2022. His Service Record is returned herewith.

(\*\*\*\*\*)



OFFICE OF THE  
DIRECTOR PTS SHAKAS  
DISTRICT KHYBER



21

Dated. 17 /02/2022.

No. 68 /PA

To. The District Police Officer,  
Mohmand.

Annex "E"

Subject:- INFORMATION AND ARRIVAL REPORT.


Memo:

It is stated that recruit Constable Sultan Shah Belt no. 2969 and Zahir Ullah Belt no. 2967 are currently under training in this institute.

It is pertinent to mention here that afore-mention recruits are dismissed from service vide District Police Officer Mohmand order No. 3346-49/PA Dated. 21-12-2021 and order no.3397/PA dated. 21-12-2021.

They made their arrival in this institute vide DD No. 08 dated 30-11-2021 (copy enclosed), and made their departure from District Mohmand vide DD No. 21 dated. 30-11-2021 Police Line District Mohmand.

Complied for the favor of information and further necessary action, please.

  
Director  
Police Training School,  
Shakas (Khyber)

ATTESTED



بخدمت جناب D.P.O صاحب قلعہ پربت

(22)

درخواست برائے بحالی تنخواہ

بلیٹ 2967

پر سنل 443236

جناب عالی!

گزارش ہے کہ درخواست دہندہ پولیس فورس میں ملازم ہے اور  
درخواست دہندہ کے بھائی سستی رحمت اللہ جون دوران سروس  
مقام پینچہ تحصیل یکے غنڈہ میں 2009ء میں شدت پسند طالبان کے  
حملے میں شہید ہو چکے۔ حکومت نے شہید کے اہل و عیال کے لئے  
سستی ظاہر اللہ ولد نظر خان کے نام حاصدار منظور کیا۔ جس پر درخواست  
دہندہ ایسا ندری و دیانہ سداون سے ڈیوٹی انجام دے رہے ہیں۔  
مگر درخواست دہندہ کے گزشتہ جون، جولائی اور اگست 2021ء  
کے تنخواہ بند ہیں اور سال کوئی نہیں ملا ہے۔

لہذا آپ صاحبان سے استدعا ہے کہ درخواست دہندہ کو گزشتہ  
جون، جولائی اور اگست کی تنخواہیں دینے کے احکامات  
صاف در فہر ما کر مشور فرمادیں۔

العا کس  
مورخہ = 17 ستمبر 2021ء  
ہر کاتبہ در ظاہر اللہ خان ولد نظر خان سپاہی پولیس فورس  
قلعہ پربت

بلیٹ 2967  
پر سنل 443236

TESTED

ASIM KHAN  
DISTRICT  
Petition Value



**DISTRICT POLICE OFFICER,  
MOHMAND TRIBAL DISTRICT AT HQ GHALLANAI**

Email: [dpomohmand@gmail.com](mailto:dpomohmand@gmail.com)  
Ph: 0924-290179 Fax: 0924-290056

23


No. 1288 /Acctt:  
Dated. 23/09/2021.

To: The Manager  
UBL. Ekkaghund

Subject: **RELEASE OF PAY.**

**Memo:**

In pursuance this office letter No.1288/Acctt: dated 23/06/2021 and Letter No.1254 dated 17.06.2021, pay of FC Zahir Ullah No.2967, having, Account No.269224346 branch code 1013 is hereby released under Police Rules 1975.

  
District Police Officer  
o/c Mohmand

ATTESTED

14/09/2021

24

Handwritten notes at top right.

سیل محمد ASI/40 مورخ 14/9/2021 وقت 15:20

29/9/2021  
Handwritten notes at top right.

اس وقت کیپٹل کا پورا شدہ 2961 جو کہ فینر III میں بطور کیپٹل  
حتم ہو چکا ہے۔ مذکورہ کیپٹل بیمہ کی کارڈ پر سہ ماہی حساب آئے  
جسکی سالانہ دورہ پورا ہو گیا ہے۔ اس کی توجیہ طلب کی جا رہی ہے  
آئندہ سال کے دوران اس کی توجیہ طلب کی جا رہی ہے۔

علاجیاتی  
نقل علاجی اور  
AH - ussain  
MHC  
Police line  
D-1-1

Stip - wounded

20 Police line  
Dist - 1

14/09/2021  
جسکی سالانہ دورہ پورا ہو گیا ہے۔ اس کی توجیہ طلب کی جا رہی ہے  
آئندہ سال کے دوران اس کی توجیہ طلب کی جا رہی ہے۔

ATTESTED  
DSP (H.G.)  
20/09/2021

Order  
Pay released and  
post him on record.  
20/9



ایڈوکیٹ: *[Handwritten Signature]*

بار کونسل/ایسوسی ایشن نمبر: be-12-3483

رابطہ نمبر: 0300-5917744

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: *[Handwritten Signature]* K.P.K

<p>مخانب: <i>[Handwritten Signature]</i></p> <p>طایم اللہ خان</p> <p>PHAWAR BAR ASSOCIATION KHYBER PAKHTOONKHA</p>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی کارروائی متعلقہ  
آن مقام *[Handwritten Signature]* کے *[Handwritten Signature]* کے *[Handwritten Signature]* کے *[Handwritten Signature]* کے *[Handwritten Signature]* کے  
کر کے قرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کاسک اختیار ہوگا، نیز وکیل صاحب کو  
راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
دائرہ کر کے اپیل مگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
مقرر شدہ کو کوئی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ پر داخیز منظور و قبول ہوگا  
دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
باہر ہو تو وکیل صاحب یا ہمدرد ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے

*[Handwritten Signature]*

PHAWAR BAR ASSOCIATION  
KHYBER PAKHTOONKHA

المرقوم:

طایم اللہ خان

0300-5917744

نوٹ: اس وکالت نامہ کی کوئی کاپی ناقابل قبول ہوگی۔

طایم اللہ خان

**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.B  
PESHAWAR.

No.

APPEAL No. 1082 of 20 22

Regd Zahir ulloh Khan  
Appellant/Petitioner

Versus

Provincial Police Officer KPK Peshawar  
RESPONDENT(S)

Respondent No. 2  
Notice to Appellant/Petitioner Regional Police Officer  
Mardan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13/9/2022 at 9:am

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

copy of Appeal  
is Attached

for Reply

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR. S.B

No.

APPEAL No. 1082 of 20 22

Zahirullah

Appellant/Petitioner

Versus

Provincial Police Officer KPK Peshawar.

RESPONDENT(S)

Respondent No. 1

Notice to ~~Appellant/Petitioner~~

Provincial Police Officer KPK Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13/9/2022 at 9:00 am.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

copy of Appeal is Attached for Reply

[Signature]  
Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

[Signature]  
9-9-2022

**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.B  
PESHAWAR.

No.

APPEAL No. 1082 of 20 22

*Repd*

*Zahir Allah Khan*

**Appellant/Petitioner**

**Versus**

*provincial police officer KPN Peshawar*

**RESPONDENT(S)**

*Respondent no. 3*

**Notice to Appellant/Petitioner**

*Distt. Police Officer  
Mohmand Tribal District.*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13/9/2022 at 9:00.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

*copy of Appeal  
is Attached*

*for Reply*

*[Signature]*

**Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.**