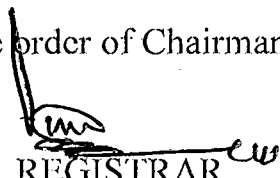


Form- A

FORM OF ORDER SHEET

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

Case No.- 1482 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/10/2022	<p>The appeal of Mr. Behroz Khan presented today by Mr. Rizwanullah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>17-10-22</u> Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 1482/2022

1. Behroz Khan, Reader to SP (Investigation) District Nowshera.

**APPELLANT**

**VERSUS**

1. The District Police officer, Nowshera and others.


**RESPONDENTS**

**I N D E X**

S.No	Particulars	Annexure	Pages #
1	Service Appeal	-	1-07
2	Affidavit	-	8
3	Copy of order dated 18-05-2015 passed by the Provincial Police officer	"A"	9
4	Copy of charge sheet alongwith statement of allegations	"B"	10, 11
5	Copy of daily diary dated 06-01-2014	"C"	12
6	Copy of order of award of minor penalty dated 10-06-2015	"D"	13
7	Copy of application dated 09-03-2022.	"E"	14
8	Copy of departmental appeal dated 10-03-2022	"F"	15
9	Copy of rejection order dated 30-06-2022	"G"	16, 17
10	Copy of revision petition dated 18-07-2022	"H"	18
11	Copy of rejection order dated 01-09-2022	"I"	19
12	Wakalatnama	-	-

Through

Dated: 13-10-2022

  
Appellant  
14/10

**Rizwanullah**  
M.A. LL.B  
Advocate High Court, Peshawar.

**BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 1482 /2022

1. Behroz Khan, Reader to SP (Investigation) District Nowshera.

**APPELLANT**

**VERSUS**

1. The District Police officer, Nowshera.
2. The Regional Police Officer, Mardan Region-I, Mardan.
3. The Provincial Police Officer, Government of Khyber Pakhtunkhwa.

**RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE  
KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE  
ORDER DATED 10-06-2015 PASSED BY  
THE DISTRICT POLICE OFFICER,  
NOWSHERA (RESPONDENT NO. 1)  
WHEREBY THE APPELLANT WAS  
AWARDED MINOR PENALTY OF  
STOPPAGE OF TWO INCREMENTS  
WITH CUMULATIVE EFFECT AGAINST  
WHICH A DEPARTMENTAL APPEAL  
WAS FILED WITH THE REGIONAL  
POLICE OFFICER (RESPONDENT NO. 2)  
ON 10-08-2022 BUT THE SAME  
WAS REJECTED ON 30-06-2022.**

THEREAFTER, A REVISION PETITION  
U/R 11-A OF THE KHYBER  
PAKHTUNKHWA POLICE RULES, 1975  
WAS FILED WITH THE PROVINCIAL  
POLICE OFFICER, KHYBER  
PAKHTUNKHWA (RESPONDENT NO. 3)  
ON 18-07-2022 BUT IT WAS ALSO  
REJECTED ON 01-09-2022.

**Prayer in Appeal**

By accepting this appeal, the impugned orders of the respondents dated 10-06-2015, 30-06-2022 and 01-09-2022 may very graciously be set aside and the disputed increments of the appellant may kindly be restored from the date of stoppage

Any other relief deemed appropriate in the circumstances of the case, not specifically asked for, may also be granted to the appellant.

**RESPECTFULLY SHEWETH,**

**Short facts giving rise to the present appeal are as under:-**

1. That the appellant was serving as Sub-Inspector (Investigation) Police Station, Pabbi, District Nowshera at the relevant time. He was performing his duty with great zeal, zest and devotion but strangely, disciplinary proceedings were initiated against him on the basis of order dated 18-05-2015 passed by the Provincial Police officer (respondent No. 3).

(Order of PPO is appended  
as Annex-A)

2. That the appellant was served with a charge sheet alongwith statement of allegations. He submitted reply, denied the allegations and also termed it as fallacious, malicious and misconceived. He further added that no inquiry under section 156(II) CrPC with regard to robbery of

a motorcycle, a Mobile set Model G-5 and cash amount of Rs. 40000/- from Abdul Aleem r/o Pabbi, vide daily diary No. 36 dated 06-01-2014 was re-entrusted to him and as such question of misplacement of file on his part does not arise. He prayed that he may kindly be exonerated of so-called allegations.

**(Charge sheet alongwith statement of allegations and daily diary are appended as Annex-B & C respectively)**

3. The above reply was not found satisfactory and as such, Nazir Khan Deputy Superintendent of Police, Nowshera Cantt. was appointed as enquiry officer to conduct departmental enquiry and dig out the truth. He finalized the enquiry in utter violation of law and recommended the appellant for minor punishment of stoppage of 02 increments with cumulative effect on account of showing his slackness towards official duties. However, appellant was not provided copy of enquiry report in order to rebut the same.

4. That the competent Authority (respondent No. 1) agreed with the findings of the enquiry officer and awarded minor penalty to the appellant as proposed above.

**(Order of impugned order is appended as Annex-D)**

5. That the Competent Authority (respondent No. 1) was under statutory obligation to have sent a copy of said order to the appellant in order to seek legal remedy against it but neither the above order was provided nor endorsed to him rather kept secret from him notwithstanding the fact that he repeatedly requested the Authority to inform him about the fate of his case.

6. That the appellant visited the general branch of Superintendent of Police office in connection with some work on 05-03-2022 and one

Asad Khan clerk informed him that the Competent Authority (respondent No. 1) awarded him minor penalty of stoppage of 02 increments. He then submitted an application to respondent No. 1 for providing the impugned order and only then, he was given attested copy of the same on 09-03-2022.

(Copy of application is appended as Annex-E)

7. That the appellant felt aggrieved by the said order, filed a departmental appeal with the respondent No. 2 on 10-03-2022 but the same was rejected on 30-06-2022. He then filed revision petition under rule 11(A) of the Khyber Pakhtunkhwa Police Rules, 1975 with the respondent No. 3 on 18-07-2022 which also met the same fate on 01-09-2022. However, no endorsement was made in respect of appellant and as such, he received the said order on 15-09-2022.

(Copy of departmental appeal, rejection order, revision petition and its rejection order are appended as Annex- F, G, H & I respectively)

8. That the appellant now files this appeal before this Hon'ble Tribunal inter-alia on the following grounds within the statutory period of law.

### **GROUND OF APPEAL**

- A. That the respondents have not treated appellant in accordance with law, rules and policy on the subject and acted in violation of **Article 4 of the Constitution of Islamic Republic of Pakistan, 1973**. Therefore, the impugned order is not sustainable in the eye of law.
- B. That the inquiry was not conducted in a manner prescribed by law as neither any witness was examined in the presence of appellant nor he was provided any chance of cross-examination. Similarly, he was also not provided any opportunity to produce his defence in support of his version. The above defect in enquiry proceeding is sufficient to declare entire process as sham and distrustful. Right of fair trial is a

fundamental right by dint of which a person is entitled to a fair trial and due process of law. The appellant has been deprived of his indispensable fundamental right of fair trial as enshrined in **Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973**. Besides, the PPO (respondent No. 3) was not competent under Rule-5(4) read with Schedule-I of Khyber Pakhtunkhwa Police Rules, 1975 (amended 2014) to constitute enquiry against appellant, placed him under suspension and also directed the respondent No. 1 to serve him with a show cause notice. It was further directed him to finalize the proceedings by 28-05-2015 vide order dated 18-05-2015 and the DPO/SSP/SP, one of them alone was competent to exercise such power under the said law. It is well settled law that when initial order or act relating to initiation of proceeding is illegal and without lawful authority then all subsequent proceedings and actions taken thereon would fall on the ground automatically. Reliance can be placed on the judgment of august Supreme Court of Pakistan reported in **2009-SCMR-339**. The relevant citation is reproduced as under:-

**2009-SCMR-page-339**

**Citation-c**

**----When initial order or act relating of initiation of proceedings was contrary to law and illegal, then all subsequent proceedings and actions taken thereon would have no basis and would fall.**

Thus, the entire process from the top to bottom is against the spirit of administration of justice. Hence, the impugned orders are not tenable under the law.

**C.** That similarly the subsequent enquiry was also conducted in utter violation of law and same irregularities and illegalities pointed hereinabove were blatantly re-committed.

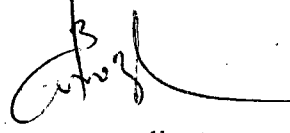
- D.** That the Competent Authority (respondent No. 1) was under statutory obligation to have considered the case of appellant in its true perspective and also in accordance with law besides, to see whether the regular inquiry was conducted in consonance with law and that the allegations thereof were proved against the appellant without any shadow of doubt or otherwise. However, he has overlooked this important aspect of the case without any cogent and valid reasons and awarded penalty of stoppage of 02 increments with cumulative effect to appellant for indefinite period in utter violation of law. Thus, the impugned orders are liable to be set aside on this count alone.
- E.** That the appellate Authority as well as Revisional authority (respondent No. 2 and 3) were under statutory obligation to have applied his independent mind to the merit of the case by taking notice about the illegality and lapses committed by the inquiry officers as well as by the Competent Authority as enumerated in earlier paras. Nevertheless, they failed to do so and rejected the departmental appeal and revision petition without any cogent reasons. Therefore, the impugned orders are bad in law
- F.** That the impugned orders are against law, facts of the case and norms of natural justice. Therefore, the same are not warranted under the law.
- G.** That the respondents have passed the impugned orders in mechanical manner and the same are perfunctory as well as non-speaking and also against the basic principle of administration of justice. Thus, the impugned orders are bad in law.
- H.** That the appellant would like to seek the permission of this Hon'ble Tribunal to advance some more grounds at the time of arguments.

In view of the above narrated facts and grounds, it is, therefore, humbly prayed that the impugned orders of the respondents dated



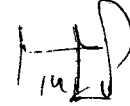
10-06-2015, 30-06-2022 and 01-09-2022 may very graciously be set aside and the disputed increments of appellant may kindly be restored from the date of stoppage.

Any other relief deemed proper and just in the circumstances of the case, may also be granted.



Appellant

Through



**Rizwanullah**  
M.A. LL.B

**Advocate High Court, Peshawar.**

Dated: 13-10-2022

**BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

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

1. Behroz Khan, Reader to SP (Investigation) District Nowshera.

**APPELLANT**

**VERSUS**

1. The District Police officer, Nowshera.

**RESPONDENTS**

**AFFIDAVIT**

I, Behroz Khan. Reader to SP (Investigation) District Nowshera., do hereby solemnly affirm and declare that the contents of the accompanied Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

*[Handwritten signature]*  
10/1/2022

*[Handwritten signature]*  
**DEPONENT**

Annex - A

9

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

No. 227/PA, AIG/E dated 19/05/2015

The District Police Officer,  
Nowshera

Suspension of SI Behrooz Khan and SI Israr Khan

Enclosed please find herewith an enquiry report conducted through inquiry, Khyber Pakhtunkhwa Peshawar. Upon perusal the IGP has passed the following remarks which are reproduced as under:-

- Both Sis Behrooz Khan and Israr Khan are placed under suspension.
- Competent authority to issue the SCN and finalize the proceedings by 28.5.2015.

It is therefore, requested that departmental action may be initiated against the defaulter officers as recommended in the findings report. Outcome of the enquiry may be intimated to this office.

Dy No: 1925

P.A. D.P.O. NSR

dt 19-5-15

Encis: -

(SYED RIDA HASSAN SHAH)  
AIG/Establishment  
For Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.

Even Enclst No. & Date

Copy to the:-

- Regional Police Officer, Mardan Region Mardan.
- PSO to IGP, Khyber Pakhtunkhwa, Peshawar.

Attested  
By  
Appellant

**CHARGE SHEET**

1. I, **Rabnawaz Khan**, District Police Officer, Nowshera, as competent authority, hereby charge **SI Behroz Khan** as per Statement of Allegations enclosed.
2. By reasons of above, you appear to be guilty of misconduct under Police Rules, 1975 and have rendered yourself liable to all or any of the penalties specified in Police Rules, 1975.
3. You are, therefore, required to submit your written defense within **07 days** of the receipt of this Charge Sheet to the Enquiry Officer, as the case may be.
4. 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 in that case ex-parte action shall follow against you.
5. Intimate whether you desire to be heard in person.

*Sdc*  
District Police Officer,  
Nowshera

Attested  
*[Signature]*  
Appellant

Attested  
*[Signature]*

*[Faint stamp]*

(11)

**DISCIPLINARY ACTION**

I, Rabnawaz Khan, District Police Officer, Nowshera as competent authority am of the opinion that SI Behroz Khan has rendered himself liable to be proceeded against as he committed the following acts/omissions within the meaning of Police Rules, 1975.

**STATEMENT OF ALLEGATIONS**

Whereas, SI Behroz Khan that he while posted at PS Pabbi now under suspension at Police Lines, Nowshera, as per report of SDPO Pabbi vide his office letter No. 297/St dated 31.03.2015 that he (SI Behroz Khan) has initiated an enquiry vide DD No. 36 dated 06.02.2014 u/s 156 (ii) Cr. PC with regard to robbery of a Motorcycle, a Mobile set Model G-5 and cash amount of Rs;40000/- from Abdul Akram r/o Pabbi and handed over the enquiry to SI Israr Khan on 14.03.2014 upon his transfer. It is worth to mention here that the said enquiry was entrusted to him on 25.05.2014 upon the transfer of SI Israr Khan which is missing, which amounts to grave misconduct on his part and rendered him liable for punishment under Khyber Pakhtunkhwa Police Rules, 1975.

For the purpose of scrutinizing the conduct of the said accused official with reference to above allegations, Mr. Nazir Khan, SDPO Cantt, Nowshera is hereby nominated as Enquiry Officer.

The Enquiry Officer shall in accordance with the provision of Police Rules, 1975, provide reasonable opportunity of hearing to the defaulter official, record his findings and make immediate recommendations as to punish or other appropriate action against the defaulter official.

SI Behroz Khan is directed to appear before the Enquiry Officer on the date, time and place fixed by the Enquiry Officer.

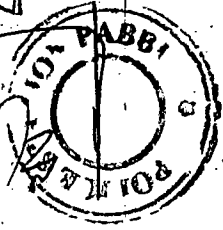
*Sd/-*  
District Police Officer,  
Nowshera

No. 124 /PA,  
Dated 06/04 /2015

*Attested*  
*[Signature]*  
Appellant

*Attested*  
*[Signature]*  
[Stamp]

MHC - No. Pathn  
4-10-2012



Handwritten text in Kannada script, oriented vertically. The text appears to be a detailed report or a list of items, possibly related to health or family welfare, given the context of the stamp. It includes various names, dates, and possibly numerical data points.

Handwritten text at the bottom of the page, including a date '6/11/14' and other illegible characters.

**POLICE DEPARTMENT****NOWSHERA DISTRICT****PUNISHMENT ORDER**

This order will be disposed of as a departmental enquiry under Police Rules-1975, initiated against SI Behroz Khan, under the allegations that he while posted at Police Station Pabbi, (now under suspension Police Lines, Nowshera), as per report of DSP Pabbi vide his office letter No. 297/S dt: 31.03.2015, he (SI Behroz Khan) has initiated an enquiry vide DD No. 36 dated 06.02.2014 u/s 156 (ii) Cr. PC with regard to robbery of a Motorcycle, a Mobile set Model G-5 and cash amount of Rs: 40,000/- from Abdul Aleem r/o Pabbi and handed-over the enquiry to SI Israr Khan on 14.03.2014 on the eve of his transfer.

It is worth mentioning here that the said enquiry was re-entrusted to SI Behroz Khan on 25.05.2014 upon the transfer of SI Israr Khan, which is missing, indicating negligence, inefficiency & mala fide intention on his part.

To ascertain facts, he was proceeded against departmentally through Mr. Nazir Khan DSP Cantt: Nowshera, who after fulfilling all necessary formalities, submitted his finding report to this office vide his office endorsement No. 346/St: dated 28.05.2015, concluding that although the applicant/complainant did not want any further action on his application, however, recommended the delinquent officer for minor punishment of stoppage of 02 annual increments with cumulative effect on account of showing his slackness towards official duties.

The undersigned is agreed with the recommendations of enquiry officer by awarding Minor Punishment of stoppage of two annual increments with cumulative effect to SI Behroz Khan with immediate effect, in exercise of the powers vested to me under Police Rules, 1975.

OB 795  
Dated 10/6 /2015.

-sd-

**(RABNAWAZ KHAN)**  
District Police Officer,  
Nowshera

No. 2555-64 /PA, dated Nowshera, the 10/6 /2015.  
Copy for information to the:-

1. Deputy Inspector General of Police, Enquiry & Inspections, Khyber Pakhtunkhwa, Peshawar w/r to his office letter No. 508/E&I, dated 05.03.2015, please.
2. Deputy Inspector General of Police, Mardan Region-I, Mardan.
3. DSP Hqrs: Nowshera.
4. Pay Officer.
5. E.C.
6. FMC with relevant papers (52 sheets).

Attested  
*[Signature]*  
Appellant

Annex - E (14)

جناب عالی!

گزارش ہے کہ بحوالہ OB نمبر 795 مورخہ 10.06.2015 دفتر جناب DPO صاحب نوشہرہ  
سائل سے 2 سالانہ اینکریمنٹ With Cumulative سٹاپ کئے گئے ہیں۔ جس کا سائل کوہ خان  
میں نہ تھا جو کہ اب اعمال نامہ چیک کرنے پر سائل کو معلوم ہوا۔  
بذریعہ درخواست استدعا ہے کہ سائل کو متذکرہ بالا آرڈر نمبر 795 مورخہ 10.06.2015 کا ایک  
قطعہ نقل دی جائے تاکہ افسران بالا صاحبان کو سزا معافی کی اپیل دائر کر سکیں۔

نوٹش ہوگی۔

الحاضر  
تاریخ فرمان SI بہروز خان متعینہ نوشی گیشن وننگ نوشہرہ  
07-03-2022  
452/م

Six  
forwarded  
DSP Investigation HQrs  
Nowshera

No. 1186 / R  
07-03-2022

Allah  
Hajrat



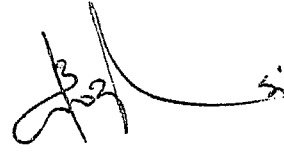
جناب عالی!

گزارش ہے کہ بحوالہ OB نمبر 795 مورخہ 10.06.2015 دفتر جناب DPO صاحب نوشہرہ،  
سائل سے 2 سالانہ اینٹکریمینٹ With Cumulative سٹاپ کئے گئے ہیں۔ جس کا سائل کو تاحال  
علم نہ تھا جو کہ اب اعمال نامہ چیک کرنے پر سائل کو معلوم ہوا۔

بذریعہ درخواست استدعا ہے کہ سائل کو اینٹکریمینٹ واپس بحال کرنے کا حکم فرما کر مشکور و ممنون  
فرمائیں۔

نوازش ہوگی۔

الرقوم 10.03.2022



العارض

تابع فرمان SI بہروز خان P-402 متعینہ انوسٹی گیشن ونگ نوشہرہ

ST/ F. W. D. P. O. P. L.

ST/ 916/ WSR  
+ 3/2/22

Attested  
Appellant

ORDER.

This order will dispose-off the departmental appeal preferred by Sub Inspector Behroz Khan No. 402/P of Investigation Wing, Nowshera against the order of District Police Officer, Nowshera, whereby he was awarded minor punishment of stoppage of two annual increments with cumulative effect vide OB No. 795 dated 10.06.2015. The appellant was proceeded against departmentally on the allegations that he while posted at Police Station, Pabbi, as per report of the then Sub Divisional Police Officer (SDPO) Pabbi, District Nowshera vide his office letter No-297/S dated 31.03.2015, he (Sub Inspector Behroz Khan) has initiated an enquiry vide daily diary No. 36 dated 06.02.2014 u/s 156(2) Cr.P.C with regard to robbery of a motorcycle, a mobile set model G-5 and cash amount Rs: 40,000/- from Abdul Aleem r/o Pabbi and handed over the enquiry to Sub Inspector Israr Khan on 14.03.2014 on the eve of his transfer. It is worth mentioning here that the said enquiry was re-entrusted to Sub Inspector Behroz Khan on 25.05.2014 upon the transfer of Sub Inspector Israr Khan, which was missing, indicating negligence, inefficiency and mala-fide intention on his part.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and the then Sub Divisional Police Officer, (SDPO) Cantt., Nowshera was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities, submitted his findings, concluding therein that although the applicant/complainant did not want any further action on his application, however, recommended the delinquent Officer for minor punishment of stoppage of two annual increments with cumulative effect on account of showing his slackness towards official duties. Therefore, the then District Police Officer, Nowshera after perusal of the enquiry file agreed with the recommendations and awarded the delinquent Officer minor punishment of stoppage of two annual increments with cumulative effect vide OB: No. 795 dated 10.06.2015.

Feeling aggrieved from the order of the then District Police Officer, Nowshera, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 22.06.2022.

From the perusal of the enquiry file and service record of the appellant, it has been found that the allegations leveled against the appellant have been proved beyond any shadow of doubt. He could not present any cogent justification for his innocence. It is worthwhile that the appellant approached this forum with the delay of 06 years, 09 months and 04 days without advancing any cogent reason, hence, badly time

Attested  
for  
Appellant

barred. Therefore, order passed by the competent authority does not warrant any interference.

Based on 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 bereft of any substance as well as badly time barred for 06 years, 09 months and 04 days.

Order Announced.

  
Regional Police Officer,  
Mardan.

No. 4034 /ES, Dated Mardan the 30/06 /2022.

- 1. Copy forwarded for information and necessary action to the:-  
District Police Officer, Nowshera w/r to his office Memo: No. 1317/PA date 06.06.2022. His Service Record is returned herewith.
- 2. ✓ Superintendent of Police Investigation, Nowshera w/r to his office Memo No. 1236/PA dated 10.03.2022.

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

Attested  
by  
Appellant

بھنور جناب انسپکٹر جنرل آف پولیس خیبر پختونخواہ، پشاور

جناب عالی!

انتہائی ادب و احترام کے ساتھ گزارش ہے کہ بحوالہ OB نمبر 795 مورخہ 10.06.2015 دفتر جناب DPO صاحب نوشہرہ، سائل سے 2 سالانہ اینٹریکٹیشنٹ With Cumulative effect سٹاپ کئے گئے ہیں۔ جس کا سائل کو تا حال علم نہ تھا جو کہ اب اعمال نامہ دیکھنے پر سائل کو معلوم ہوا۔ اندریں سلسلہ سائل نے جناب ریجنل پولیس آفیسر صاحب مردان کو محکمانہ اپیل پیش کر کے جو صاحب موصوف نے بحوالہ آرڈر نمبر 4534/ES مورخہ 30.06.2022 کی اپیل مسترد فرمانے کے احکامات جاری فرمائے ہیں۔

بذریعہ درخواست استدعا ہے کہ سائل کی سزا کو معاف فرمانے اور سائل کے سالانہ اینٹریکٹیشن بحال فرمانے کے احکامات جاری فرما کر سائل اور سائل کے اہلخانہ کو مشکور و ممنون فرمائیں۔ سائل آپ جناب کی اقبال بلندی کے لئے تا عمر دعا گو رہے گا۔

الرقوم 18.07.2022

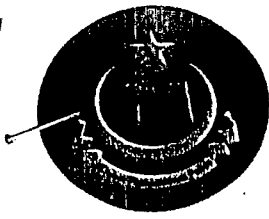
العارض  
تالیع فرمان SI بہروز خان P-402 متعینہ انوشی کیشن ونگ نوشہرہ

PA/EC  
For m/a.

Attested  
Appellant.

18/7/22

Answer - f (19)



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar.

No. S/ 1978

/22, dated Peshawar the 01/09/2022.

To : The Regional Police Officer,  
Mardan.

2278  
02/9/22

Subject: MERCY PETITION.

Memo:

Please refer to your office Memo: No. 5000/ES, dated 27.07.2022.

The Competent Authority has examined and filed the revision petition submitted by Sub-Inspector Behroz Khan No. P/402 of Investigation Wing, Nowshera against the punishment of stoppage of two annual increments with cumulative effect awarded by District Police Officer, Nowshera vide OB No. 795, dated 10.06.2015, being badly time barred.

The applicant may please be informed accordingly.

EC  
PPS  
1/9

AA 31/08  
(AFSAR JAN)  
Registrar,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

EC / SP / M / DSR

For information

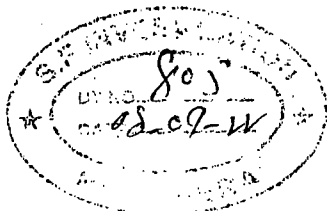
No: 5902/ES  
Date 02/9/22

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FR No Mardan  
01.09.2022

Attached  
By  
Appellant

top / m  
For n. action  
DPONS  
209/2022

No. 1904/PA  
dt 05/09/2022  
EC/PA  
FR N/action



SP / M / DSR  
8/9/2022

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 @vmail.com  
 address@vmail.com

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 2022  
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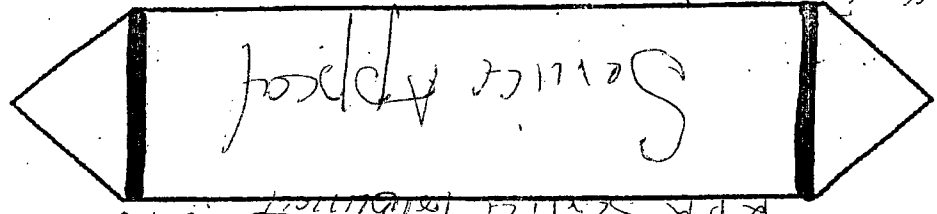
مقدمہ میں عرض کیا گیا ہے کہ اس کی وجہ سے اس کی کارکردگی متاثر ہو رہی ہے۔  
 اس کی وجہ سے اس کی کارکردگی متاثر ہو رہی ہے۔  
 اس کی وجہ سے اس کی کارکردگی متاثر ہو رہی ہے۔  
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 اس کی وجہ سے اس کی کارکردگی متاثر ہو رہی ہے۔

Appreciate  
 [Signature]

پپو & میٹس  
 VS

Behroz Khan

مقدمہ  
 ذیلی  
 قسم



Before the Honble Chairman  
 KPK Service Tribunal  
 خیرا

B-C 09050  
@vmail.com

03005945043  
advocate@vmail.com

Fashawat only  
عزیز

11/10  
10 October 2013  
التاریخ

محترم سربراہ،  
پروٹوکول نمبر 100/2013  
کیس نمبر 100/2013  
میں سزا دینی کی درخواست  
کیس نمبر 100/2013  
میں سزا دینی کی درخواست  
کیس نمبر 100/2013  
میں سزا دینی کی درخواست  
کیس نمبر 100/2013  
میں سزا دینی کی درخواست

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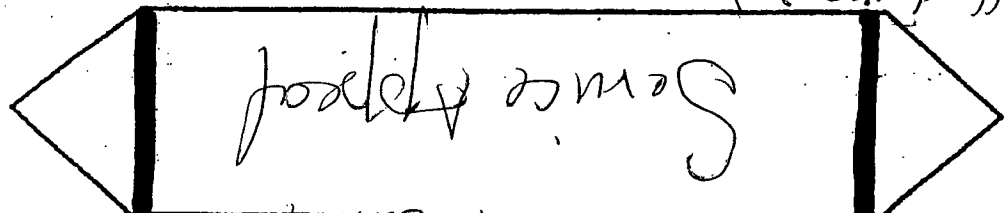
2013/10/11  
H. H. H.

PPo & others vs

Behroz Khan

(Appellant vs Respondent)

نمبر  
تاریخ  
مقام  
مقام



Before the Honble Chairman  
KPK Service Tribunal  
بجانب