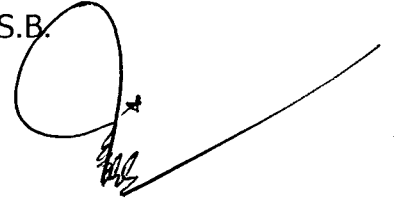


07.04.2022

Counsel for the appellant present.

Due to paucity of time, the case could not be heard. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for preliminary hearing on 28.04.2022 before S.B.



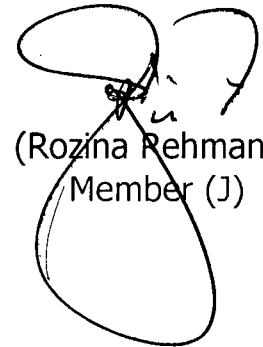
(MIAN MUHAMMAD)
MEMBER(E)

28.04.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments. To come up for reply/comments on 08.07.2022 before S.B.

Rs-600/-
Appellant admitted
Security & Process Fee
A. J. Rehman
28/4/22



(Rozina Rehman)
Member (J)

08.07.2022

Due to Public Holiday on account of Eid-UI-Adha case to come for the same on 13.09.2022.



Reader

The appeal of Mr. Waqas Ahmad S/O Sami Ullah, Ex-Constable 326/5540 of FRP HQrs, R/O Mathra District Peshawar received today i.e. on 08.02.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Address of respondent no 4 is incomplete which may be completed according to Khyber Pakhtunkhwa Service Rules, 1974.

No. 649 /S.T,

Dt. 10-3- /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Noman Ali Bukhari Adv. Pesh.

Respected Sir,
It is, submitted that, the Respondent No 4 may be deleted from the panel of Respondent being unnecessary. File re-submitted.
Received today 7/4/2022
7/4/2022

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2022

Waqas Ahmad

V/S

Police Deptt:

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S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	1-7
2.	Copy of appointment order	A	08-09
3.	Copy of medical documents	B	10-19
4.	Copy of charge sheet	C	20-21
5.	Copy of reply	D	22
6.	Copy of show cause notice	E	23
7.	Copy of impugned order	F	24
8.	Copy of departmental appeal	G	25
9.	Copy of rejection order	H	26
10.	Copy of 11-A petition	I	27-28
11.	Wakalat Nama	-----	29

APPELLANT

THROUGH:

[Signature]
SYED NOMAN ALI BUKHARI
(ADVOCATES, PESHAWAR)

[Signature]
UZMA SYED
Advocate High Court

(1)

BEFORE THE KHYBER PAKHTUNKWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. _____/2022

Waqas Ahmad Son of Sami Ullah

(Ex-Constable 326/5540 of FRP HQRs)

R/O Mathra District Peshawar **Appellant**

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. The Commandant Frontier Reserve Police (FRP), Khyber Pakhtunkhwa, Peshawar.
3. Deputy Commandant Frontier Reserve Police (FRP), Khyber Pakhtunkhwa, Peshawar.
4. DSP (FRP) Khyber Pakhtunkhwa, Peshawar
..... **Respondents**

APPEAL UNDER SECTION OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE ORDER DATED OF REMOVAL OF THE
APPELLANT FROM SERVICE BY RESPONDENT NO. 3
DATED 09.07.2020 AND AGAINST THE REJECTION
ORDER DATED 16.07.2021, WHERE BY THE
REPRESENTATION/DEPARTMENTAL APPEAL OF
THE APPELLANT MAY BE REJECTED FOR NO GOOD
GROUNDS AND AGAINST NOT DECIDING REVISION
PETITION UNDER 11-A OF THE APPELLANT WITHIN
STATUTORY PERIOD OF 90 DAYS.

PRAYER:

ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED
ORDER DATED 09.07.2020 PASSED BY THE
RESPONDENT NO, 3 AND THE REJECTION ORDER
DATED 16.07.2021 MAY KINDLY BE SET ASIDE AND
THE APPELLANT MAY PLEASED BE REINSTATED IN
TO SERVICE WITH ALL BACK AND CONSEQUENTIAL

(2)

**BENEFITS. ANY OTHER REMEDY, WHICH THIS
AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE
THAT, MAY ALSO, BE AWARDED IN FAVOUR OF
APPELLANT.**

Respectfully Sheweth:

1. That the appellant was appointed as constable in the Police Department (FRP) Peshawar (HCRRS). The appellant from the date of appointment performed his duties with full zeal and devotions and up to the entire satisfaction of his superiors **(Copy of the appointment order is attached as Annexure "A")**.
2. That due to illness of the mother of appellant, he submitted verbal request for leave but the request was not accepted therefore the appellant remained absent due to illness of his mother, so the absent of the appellant was not willful. **(Copy of Medical documents are attached as Annexure "B")**.
3. That the disciplinary proceedings initiated against the appellant and charge sheet and statement of allegations issued to the appellant and the appellant submitted reply of the allegations and denied the allegations specifically. **(Copy of Charge Sheet and statement of allegations and reply are attached as Annexure "C & D")**.
4. That show cause notice issued on 11.06.2020 without providing any inquiry report to the appellant along with show cause notice and reply submitted by the appellant denied the allegation and the reply of the show cause notice of the appellant has been turned down and the appellant has been dismissed vide order dated 09.07.2020 retrospectively. **(Copy Show Cause Notice , impugned order are attached as annexure "E & F")**.
5. That the appellant feeling aggrieved filed representation/departmental appeal, which was also rejected vide order dated 16.07.2021 for no good grounds. **Copy of the departmental appeal and rejection order are attached as annexure-G & H.**

6.

That the appellant feeling aggrieved filled 11-A revision petition under police rule 1975 to IGP KP Peshawar which was not responded with in statutory period of 90 days. Hence the present services appeal amongst other. **Copy of 11-A revision is attached as annexure- I.**

GROUND:

- A) That the impugned order of removal from service of appellant dated 09.07.2020 and 16.07.2021 is against law, facts, and justice and is liable to be set aside.
- B) That the appellant has not been dealt in accordance with law and rules.
- C) That the impugned order was retrospective order which was void in the eye of law and according to Superiors Court Judgment reported as 2002 SCMR, 1129 and 2006 PLC 221. And no limitation run against the void order.
- D) That the disciplinary proceedings initiated against the appellant, is not according to law and rules as laid down in service laws,
- E) That the inquiry has been conducted in according with law and the allegations leveled against the appellant have not been proved.
- F) That the appellant has been condemned unheard in violation of Article 10-A of the Constitution of Islamic republic of Pakistan and in violation of maxim "Audi Alterum Partum" and has not been treated according to law and rules. That according to reported judgment cited as **2019 CLC 1750** stated that Audi Alterum Partum" shall be read as part and parcel of the every statute. The same principle held in the Superior Court judgments cited as **2016 SCMR 943, 2010 SCMR 1554 and 2020 PLC(cs) 67.**
- G) That the appellant have not been treated in accordance with law hence the appellant right secured and guaranteed under the law are badly violated.

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- H) That the appellant have never committed any act or omission with bad or malafide intentions which could be termed as misconduct, albeit the appellant was dismissed from the service. Which is violation of reported judgment cited as 1997 PLC cs 564.
- I) That the impugned order was not passed accordance with law which was void in the eye of law and according to Superiors Court Judgment reported as 2007 SCMR 834, and 2015 SCMR 795.
- J) That inquiry report was not provided to the appellant with show cause notice which was also violation of law and rules, so the impugned order was passed in violation of law and rules and norms of justice. The same principle held in the Superior Court judgments cited as 1981 PLD SC 176 and 1987 SCMR 1562.
- K) That no proper regular inquiry was conducted, if any but the appellant not associated with the inquiry. Neither the statement recorded in presence of appellant nor was the chance of cross examination provided to the appellant which is violation of law and rules, which were totally ignored before imposing punishment which is illegal and against the law, rules and natural justice. The same principle held in the Superior Court judgments cited as 2010 SCMR 1554, 2016 SCMR 108, 2009 PLC (cs) 19, 2008 SCMR 1369, 2009 SCMR 412, 2007 PLC cs 247 and 2008 PLC cs 1107.
- L) That the opportunity of personal hearing and personal defense was not provided to the appellant which was violation of Rule. The same principle held in the Superior Court judgments cited as 2006 SCMR 1641.
- M) That mother of appellant was ill during those days and medical documents was produced during inquiry, but the enquiry office did not consider such position of the appellant.
- N) That the absent of the appellant was not intentionally but due to illness of mother. So the penalty imposed upon the appellant was so harsh.

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- O) That, because the allegation have not been proved but still in punishment has been awarded, is very much harsh and against the fundamental right embodied in the constitution.
- P) That any other ground may be added at the time of argument with the permission of this Hon'able Tribunal.

It is therefore, humbly requested that the appeal of the appellatant may be accepted as prayed for.

Handwritten signature
APPELLANT
MUHAMMAD WAQAS

THROUGH:

Handwritten signature
(SYED NOMAN ALI BUKHARI)
ADVOCATE, HIGH COURT

Handwritten signature
UZMA SYED
Advocate High Court

6

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2022

Waqas Ahmad

V/S

Police Deptt:

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in this Tribunal, except the present one.


DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE.
3. Any other case law as per need.


(SYED NOMAN ALI BUKHARI)

ADVOCATE HIGH COURT

24

 **BEFORE THE KHYBER PAKHTUNKWA SERVICE TRIBUNAL**
PESHAWAR

Service Appeal No. _____/2022

Waqas Ahmad Son of Sami Ullah

..... appellant

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others

..... Respondents

AFFIDAVIT

I, Waqas Ahmad S/o Sami Ullah R/o Mathra District Peshawar do hereby affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Court.


DEPONENT

ENLISTEMENT ORDER

A

08



The following Candidates have qualified physical and written test for recruitment as Constable in Police Department through National Testing Services (NTS) Islamabad. After Psychological evaluation and Physical Measurement they are hereby appointed as recruit Constables in CCP, Peshawar with immediate effect from over all merit list according to Date of Birth as per instruction vide W/PPO letter No.4513-43/E-IV, dated 17.07.2014 and letter No.5730-63/E-IV, dated 26.08.2014 subject to the Medical fitness and local verification.

Their services are purely on temporary basis, and liable for termination at any time without any notice.

Over All Merit	NTS	Name	Father Name	Address	Local PS
1.	1	Sayad 2381	Riaz Khan	Budni	Chamkani
2.	2	Jamil Hussain 5417	Zamir Gul ✓	Mera Urmur Miana Shagai Urmur Payan	Urmur
3.	3	Muhammad Ajmal 3981	Karim Khan	Kanday Payan Sango	Sarband
4.	4	Mian Waseem Ullah 1574	Mian Aman Ullah	Ghari Mingan Musa Zai	Badaber
5.	8	Sikander Khan 5150	Ghani Ur Rehman	Mian Gujar	Daudzai
6.	7	Zia Ur Rehman 4432	Shams Ur Rehman	Qambar Khel Urmur Payan	Urmur
7.	9	Qamar Abbas 1571	Imdad Khan ✓	Warsak Road Dohri Kalay	Daudzai
8.	6	Muhammad Awais Khan 5494	Sikander Khan	Kowa Sawan	Khazana
9.	12	Haider Ali 1321	Muhammad Ali	Dalazak	Chamkani
10.	16	Imad Khan 1158	Lal Rahman	Chagar Matti	Mathra
11.	14	Abzar Muhammad 2097	Abdul Muhammad	Wazir Qela	Daudzai
12.	18	Ameer Shah 3607	Behramand ✓	Gulbela	Khazana
13.	10	Hussain Ahmed 1992	Said Muhammad ✓	Nasapa Bala	Chamkani
14.	20	Faheer Ullah 5944	Gul Sharaf	Moh: Sheikhan Muhammad Dalazak Road	Chamkani
15.	11	Shiraz Khan 3926	Mir Said	Gulozai	Chamkani
16.	19	Muhammad Aakif 1225	Muhammad Shah	Moh: Umar Khel Village Mussa Zai	Badaber
17.	17	Salman Khan 227	Essa Khan	Nasir Ghari Mera Kachori	Chamkani
18.	13	Akhter Mehmood 4536	Rozamin	Mohallah Toti Khel	Badaber
19.	22	Hazrat Bilal 5614	Darwaish Gul	Gulbela Kochian	Daudzai
20.	15	Izhar Ullah 4327	Hawas Khan	Moh: Ittefaq Abad Surizai Bala	Badaber
21.	23	Irshad Ullah 3741	Zafir Ullah	Moh: Sheikhan Mussa Zai	Badaber
22.	29	Inam Ullah 4745	Khan Wali	Garhi Sadu	Mathra
23.	30	Rafaqat Ullah Jan 3109	Abdul Jabar Khan	Mussa Zai	Badaber
24.	26	Tauseef Ahmad 5621	Muhammad Ikhtiar	Mussa Zai	Daudzai
25.	28	Rehman Gul 3511	Ahmad Jan ✓	Kochian Gulbela	Badaber
26.	27	Sadiq Ali 5499	Taj Muhammad Khan	Mera Balarr Zai	Daudzai
27.	25	Humayun Khan 3095	Abdul Majeed	Kochian Gulbela	Sarband
28.	24	Haider Ali Shah 1049	Farhadi Shah ✓	Sango	Mathra
29.	31	Shamshad Alam 5344	Alam Khan	Village Peer Kalay Chagar Matti	Chamkani
30.	33	Jawad Alam 1749	Jan Muhammad	Moh: Rerra Jagra	Chamkani
31.	32	Kaleem Ullah 3968	Jan Muhammad	Shagi Bala	Daudzai
32.	34	Bilal 5423	Shamsher Khan	Daman Afghani	Daudzai
33.	36	Alta Ullah 5892	Akram Khan	Toheed Colony	Phandu.
34.	41	Muhammad Asghar 2182	Bahar Luqman ✓	Farhan Colony Carsadda Road	Faqirabad
35.	40	Fazli Jehan 1376	Daulat Khan ✓	Daman Afghani Nahaqi	Daudzai
36.	38	Ayaz Muhammad 4267	Shah Jehan	Moh: Habibzai Adezai	Mattani
37.	35	Sawab Gul 1388	Taj Muhammad	Kharaka	Daudzai
38.	45	Khaista Rahman 3883	Shashti Gul	Moh: Bami Khel Mussa Zai	Badaber
39.	47	Zakir Hussain 5130	Malik Ur Rahman	Mohallah Ma Ma Khel	Badaber
40.	44	Abdur Rehman 4549	Fida Muhammad	Moh: Bachi Korona Safid Sang	Nasir Bagh
41.	46	Meer Alam 2423	Mukaram Khan ✓	Garangi Bala Chagar Matti	Mathra
42.	37	Junaid Afridi 2986	Saeed Ullah ✓	Ring Road Latif Abad Street No.16	Faqirabad
43.	48	Sheraz Khan 592	Rehmat Khan	Mathra	Mathra
44.	43	Aezaz Ullah 1002	Hashim Ali Khan	Tuda	Khazana
45.	51	Syed Noman Shah 5359	Inayat Ullah Khan	Moh: Khan baba	AMJ Shah
46.	39	Shahzeb Khan 3757	Syed Feroz Shah	Sardar Colony St: No. 12	Faqirabad
47.	50	Waqar Ahmad 2932	Mansood Khan	Khandak Kot Najeeb Ullah	Badaber
48.	42	Alamzeb 2207	Zahoor Ahmad	Kankola	Khazana
49.	52	Kashif Khan 2693	Mohammad Yousaf ✓	House No. 284 St: No.02 New Kakshal Wazir Bagh Road	AMJ Shah
50.	55	Shor Khan 5637	Ezat Khan	Daha Bahadar Moh: Marozai	Badaber
			Mirawas Khan ✓	Kohat Road Mattani Aza Khel Mohallah Tawas Khel	Mattani

2654
1191/14

4807 → 5990

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51	45	Zia Ur Rehman 2367	Shams Ur Rehman	Ghalji Kander Khel	Mathra
52	54	Sadaqat Ali 5982	Liaqat Ali	Badshah Khel	badaber
53	58	Syed Shoab Shah	Syed Noorani Shah	Budni	Chamkani
54	60	Amjad Khan 5466	Yar Afzal ✓	Madeena Colony St: No. 05 Dora Road	Banamari
55	59	Abbas Ali Shah 1708	Shah Said Badshah	Choha Gojer	Chamkani
56	61	Zuhaib Khan 2764	Nisar Ahmed	Mohallah Ibrahim Khel Bahadar Kalay	Banamari
57	56	Sapna Gul 4790	Sahib Gul	Mian Gujar	Daudzai
58	63	Muhammad Arif 5574	Hikmat Khan	Kankola	Khazana
59	53	Waqif Ullah Khan 5624	Mukarem Khan	Ghari Sobat Khan	Khazana
60	68	Javed Khan 4398	Nasir Khan ✓	Moh: Ibrahim Khel Surizai Bala	Sarband
61	65	Imran Ullah 2672	Fazl Ullah		Badaber
62	64	Muhammad Hammad 3045	Sulernan Shah	Sheikh Muhammadi	Badaber
63	69	Waheed Gul	Nazar Gul	Phandu Road Shaheed Abad	Phandu
64	77	Muhammad Waseem	Jan Muhammad	Saeed Abad	Faqirabad
65	73	Waqas Ahmad 5990	Samiullah Khan	Haji Zal	Mathra
66	70	Shahnawaz Khan 2616	Gulnawaz ✓	Shali Bala	Regi
67	62	Abdur Rahman Khan	Shakir Khan 4807	Kaddi Ashab Baba	Mathra
68	76	Nawaz Khan 1442	Zarmast ✓	Azakhel Mamokhel Kohat Road	Mattani
69	71	Naeem Ullah 5989	Mujahid Khan	Budni	Chamkani
70	85	Amjad Afridi 5890	Bahadar Khan	Mera Mashogagar	Badaber
71	83	Muhammad Zeeshan Tariq 1101	Muhammad Tariq	Mian Gujar	Daudzai
72	81	Ijaz Ahmed 1438	Akhtar Mir ✓	Malakander Mohallah Nasir Bagh road Faisal Town	Nasirbagh
73	80	Rameez Ahmad 5977	Ashfaq Ahmad	G.T Road Chughal Pura	Chamkani
74	82	Sadiq Hussain	Pakistani	Family Quarter Police Lines	East Cantt
75	87	Mohammad Bilal 2408	Fazal-E-Esubhan ✓	Inayat Khel Ahmad Khel	Badaber
76	88	Zardad 6000	Zarsaid	Meher Gul Kalay Mera Kichory Tarnab form	Chamkani
77	79	Muhammad Bilal 2786	Gul Rehman	Moh: Aftizal	Regi
78	90	Muhammad Shoab Khan 5994	Atlas Khan	Dalazak Road Gulozai Merakzei	Chamkani
79	96	Aurangzeb Gul 5991	Haji Gul	Wapaga Peshawar	Chamkani
80	92	Imdad Hussain 5454	Yar Hussain	Sharkera Passani	Mattani
81	75	Syed Muzafar Ali Shah 5996	Syed Noor Ali Shah	Muhamamdai	Chamkani
82	97	Zahoor Khan 5995	Akhtar Munir	Khazana Bala	Khanzana
83	95	Siraj Gul 5993	Alif Gul	Gara Tajick Maini Korona	Mathra
84	93	Nabi Amin 3845	Nazar Muhammad	Village Ghari Hamza Nahaqa	Daudzai
85	101	Abdul Qadir	Hastam Khan	Warsak Colony Village Ghari Sherdad	Mathra
86	102	Noor Ur Rehman 2328	Gulistan Khan ✓	Dalazak Road Gulozai	Chamkani
87	100	Rizwan Ullah 1442	Sadaqat Hussain ✓	Fatu Abdur Rhaima Dalazak Road	Chamkani
88	99	Hazrat Bilal 2336	Ali Sayed ✓	Sardar Colony Charsadda Road	Faqirabad
89	89	Zarshad Hussain 5992	Fazal Hussain	Mussazai Mohallah Gul Abad	Badaber
90	104	Sajjad Shah 5997	Ismail Shah	Surizai Payan	Badaber
91	103	Faisal Khan 5997	Madad Khan	Shakar Pura Nahaqai	Daudzai
92	106	Salman Zeb 2223	Amir Zeb	Passani Bala	Mattani
93	98	Badi Uz Zaman 5998	Gul Zaman	Safaid Sang Patwar Payan	Mathra
94	113	Muhammad Tariq 2187	Gul Khan	H. No. 02 Nahaqai Nami Road	Daudzai
95	117	Naeem Gul 2662	Nazeer Gul	Ghari Rehman Nahaqai	Daudzai
96	107	Saddique Ullah 2716	Mumtaz Khan	Shahali Bala	Daudzai
97	110	Arif Ur Rehman 6009	Razi Rahman	Moh: Yasin Khel Urmar Bala	Urmar
98	108	Muhammad Shabir Khan 6007	Abdul Jalil Khan	Kandar Khel	Mathra
99	112	Muhammad Naveed	Sabar Khan 6006	Safaid Sang	Regi
100	115	Rashid Ali 6003	Ihsan Ul Haq	Mian Gujar	Daudzai
101	116	Basit Ali 6002	Waris Khan	Buda Kander Khel	Mathra
102	124	Muhammad Fawad	Ahmad Khan 6003	Moh: Balo Khel Payan Maramzai	Badaber
103	122	Atif Jan 6007	Noor Zaman	Karari Gulbela	Daudzai
104	121	Ibrar Hussain 6005	Omer Gul	Nana zai Kagawala Kohat Road	Badaber
105	125	Kamal Khan 6001	Fazal E Karam	Buda Kandar Khel	Mathra
106	126	Anees Ur Rehman	Muhammad Akram	Pajjagi Road Terai Bala	Mathra
107	120	Hidayat Ullah 1652	Raheem Ullah	Nasibagh Road Juma Khan Kalay Watan Bagh	Nasirbagh
108	130	Niaz Gul 4302	Khalil Ur Rehman	Bela neko Khan	Chamkani
109	118	Tahir Shahzad 3662	Muzaffar Khan	Dalazak Road Wadpagga	Chamkani
110	133	Rooh Ullah Jan 4611	Namdar Khan	Gulozai Dalazak Road	Chamkani
111	134	Ijaz Ahmad 2648	Tawas Khan	Khado Khel Village Adezai	Mattani
112	128	Hidayat Ullah 5729	Mushran	Bakhshi Pull	Khazana

2321

4791

5935

OB # 2654
01/109/2014

vide order # 11483-87/051
11/11/2014

B

(15)



Dr. Mian Mukhtar-ul-Haq Azeemi

MBFS, FCPS PSYCH, CCST (UK) FRCP (UK)
Consultant Psychiatrist

اکٹرمیاں مختار الحق عظیمی
بی اے ایف سی ایس پی ایس سی او ایس سی (انگلینڈ)
بی آئی پی (انگلینڈ)
ہر امراض نفسیات، ذہنی دوائی، اعصاب، جنسیات
شیات، مرگی، سردرد، کیس

بسمہ تعالیٰ

Name W/O Samiullah Date 18/1/21 ID _____

Forgetfulness

دار سائیکھ

① 500mg memril 10mg
 7-8 1/2 tableting
 بر
 7-8 1/2 tableting
 بر
 10 1 + 1
 10
 OLAN 5mg
 2-3 1/2
 1 tableting

Not Valid for Medicolegal Purpose

تعطیل بروز ہفتہ الوار

آئینہ ماہ بند
2021

دوبارہ معائنہ:

فون: 0345-9075836

نمبر لینے کے لئے ایک دن پہلے سہ پہر 3 بجے تا شام 7 بجے تک رابطہ کریں۔

کلینک: آٹا سٹرو، سیتال، اکٹر انہر B-12 ڈگری گارڈن پشاور

LT. Col

Dr. Adeem Ashraf

MBBS (Pb), FCPS (Pak),
Classified Medical Specialist, OJT (UK)
Specialist in Critical Care
CMH, Peshawar
Cell: 0321-5310226



11



لیفٹننٹ کرنل

ڈاکٹر ندیم اشرف

ایم بی بی ایس (پنجاب)، ایف سی پی ایس (پاک)
کلاسفائیڈ میڈیکل سپیشلسٹ، اوسجے ٹی انگلینڈ
ماہر امراض جگر، معدہ، شوگر، بلڈ پریشر

ماہر امتحانی نگہداشت

سی ایم ایچ (پشاور)

Name: W/3 Samiullah

Age: 60 Date: 12-3-16

BP = 150/90
normal

Myalgia cheer

Tam. Feldene flash 20

۲۰ - ۱۰۰ - ۲۰ - ۱۰۰

Tam. MIVAT (2mg)

۲ - ۱۰۰ - ۲۰ - ۱۰۰

Tam. INDOMET (40mg)

۲۰ - ۱۰۰ - ۲۰ - ۱۰۰

Tam. LOROTANIL (3mg)

۲۰ - ۱۰۰ - ۲۰ - ۱۰۰

Tam. CAPSICAM - ۱۰۰

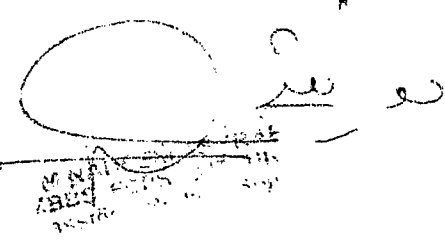
۲۰ - ۱۰۰ - ۲۰ - ۱۰۰

CAP. DOXIVUM

۲۰ - ۱۰۰ - ۲۰ - ۱۰۰

Sym. METILIVAM

۲۰ - ۱۰۰ - ۲۰ - ۱۰۰



12



ساکنان سسر
ڈاکٹر میاں مختار الحق عظیمی
ایم بی بی ایس، ایف سی پی، سی سی ٹی (یو کی) فر سی پی (یو کی)
ایف سی پی (ایس ایم سی)
ایف سی پی (ایس ایم سی)
ایف سی پی (ایس ایم سی)

Dr. Mian Mukhtar-ul-Haq Azeemi
MBBS, FCPS PSYCH, CCST (UK) FRCP (UK)
Consultant Psychiatrist

Name W/O [unclear] Date 24/12/21

Pshwar

Memorandum
Olanzapine

Oral Memantine Long
[unclear]
[unclear]
Oral Olanzapine
[unclear]

حالیہ کسٹڈ
24 دسمبر 2021
[unclear]

24
[unclear]
3 ماہ

[unclear]

Not Valid for Medicolegal Purpose

تعطیل بروز ہفتہ - اتوار

فون: 0345-9075836
نمبر لینے کے لیے ایک دن پہلے سہ پہر 3 بجے تا شام 7 بجے تک رابطہ کریں

کلینک آبا سین ہسپتال کمرہ نمبر B-12 ڈگری گارڈن پشاور

Dr. Musharaf Khan

M.B.B.S, M.P.H.
Public Health Specialist



13



ڈاکٹر مشرف خان

بی۔ بی۔ ایس، ایم۔ پی۔ ایچ

پبلک ہیلتھ سپیشلسٹ

NOT VALID FOR COURT

Name:

W/o Samia Ullah

Add:

Age:

Sex:

Date:

13/4/0



Clinical Record

Rx

to Memoral

10/5
1

Cap. Trimetabol

11 - 11 - 11

Cap. Brainix / Aclin

1 + 1

()

J

CONTACT: 0321-9030558
0300-5952407

کلینک: شیخ محمدی پشاور

14



Dr. Mian Mukhtar-ul-Haq Azeemi
MBBS, FCPS PSYCH, CCST (UK) FRCP (UK)
Consultant Psychiatrist

سائز کا ٹرسٹ
ڈاکٹر میاں مختار الحق اعظمی
ایف بی بی ایس، ایف سی پی ایس، سی سی ایس پی (انگلینڈ)
ایف آر سی پی (انگلینڈ)
ماہر امراض نفسیات، ذہنی، دماغی، اعصاب، جنسیات
نشیات، مرگی، سر درد، گیس

بسمہ تعالیٰ

Name Fajira Bafum Date 2 16 21 I.D.

① Sub: Epival 50mg

① + ①

— 2 1 2 2

② Sub: OLAN 5mg

① + ①

— 2 1 2 2

③ Sub: Memril 10mg

① + ①

— 2 1 2 2

لازمًا جان

④ ماہ بند
2021

دوبارہ معائنہ:

Not Valid for Medicolegal Purpose

تعطیل بروز ہفتہ - اتوار

فون: 0345-9075836

Brig.

Dr. Kamran Aziz

MBBS, FCPS (Medicine)

Classified Medical Specialist

Associate Professor of Medicine

Head of Department (Medicine)

C.M.H Peshawar

Speciality: Internal Medicine Gastroenterology

& Hepatology

Office: 091-20136111



15

پیشوا
ڈاکٹر کامران عزیز
پی ایچ ایس، ایف سی پی ایس (میڈیسن)
کلاسفائیڈ میڈیکل اسپیشلسٹ
اسٹنٹ پروفیسر آف میڈیسن
یڈ آف ڈیپارٹمنٹ (میڈیسن)
سی ایم ایچ، پشاور
ہر امراض: میڈیسن، معدہ و جگر

Bajina Begum

Patient's Name:

Age:

60

Date:

21.11.15

Shoulder pain

BP 145/90

Hand

Soft song

۱/۲ گولی ہر ۵ دن ہر
اگونی ہر ۶ ماہ

Tab Decalc Plus

۱م ۱م ۱م ۱م

Dr. Indsop 200000 10

~~۱/۲ گولی ہر ۵ دن ہر~~

~~۱/۲ گولی ہر ۶ ماہ~~

Nubersol Forte

۱م ۱م ۱م ۱م

[Signature]
21/11/15

(16)



ٹینٹ کرل

اکٹر ندیم اشرف

آئی بی ایس (پنجاب)، ایف سی پی ایس (پاک)

اسٹیفانیڈ میڈیکل سپیشلسٹ، او جے ٹی انگلینڈ

ہر امراض جگر، معدہ، شوگر، بلڈ پریشر

برائجنائی گھمبداشت

ایم ایچ (پشاور)



Lt. Col

Dr. Nadeem Ashraf

MBBS (Pb), FCPS (Pak),

Classified Medical Specialist, OJT (UK)

Specialist in Critical Cares

CMH, Peshawar

Cell: 0321-5310226

Name: Safina Begum Age: 60 Date: 12-3-16

BIP = 150/90
mmHg

Myalgia chest

Tam. Feldene flash 20

مے سی وی سی 20

Tam. MOVAT (2mg)

مے سی وی سی 2

Tam. INDOMET (40mg)

مے سی وی سی 40

Tam. LEXOTANIL (3mg)

مے سی وی سی 3

Tam. CAPLAM - 50

مے سی وی سی 50

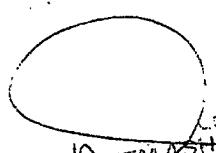
Syr. METILINAM

CAP. DOXIVAM

مے سی وی سی 2

مے سی وی سی 2

CXR H



M. NADEEM ASHRAF
MBBS FCPS OJT UK
Classified Medical Specialist

Assistant Professor

Dr. Noor Faraz

MBBS(KMC)
FCPS(Psychiatry)
ICAP (USA)

Department of Psychiatry
Khyber Medical University (KMU)
Peshawar.
DHQ Hospital KDA
Ex-Registrar Khyber Teaching Hospital
Peshawar.



17



شہنت پروفیسر
ڈاکٹر نور فراز

ایم بی بی ایس (کے ایم بی ایس)
ایف سی پی (سائیکیاٹری)
آئی سی اے پی (ایم ایس)

ماہیگا ٹرسٹ، سائیکوٹراپیسٹ، ایڈکشن کونسلر
شعبہ امراض دماغ و نفسیات
خیبر میڈیکل یونیورسٹی (کے ایم یو) پشاور
ڈی ایچ کیو ہسپتال کے ڈی ایس
سابقہ رجسٹرار شیر پاور ہسپتال پشاور

ماہیگا ٹرسٹ، سائیکوٹراپیسٹ، ایڈکشن کونسلر

اوقات کار: روزانہ 9 بجے سے 5 بجے تک

Name

Miss Safura Bibi

Age

70y

Sex

F

Date

18-11-20

Clinical Record

wf, 70y

Box

Cap. Olanco. 15/25 mg. ✓

Tab. Epinal 5mg.

Tab. Neurost 25mg.

Tab. Wellbutrin

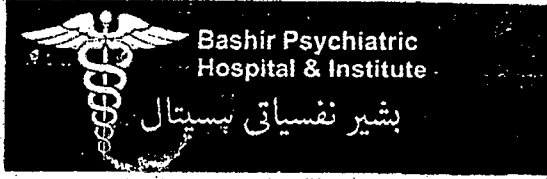
Syr. Cestamil. 100mg.

Not Valid for Medico Legal Purpose

Assistant Professor
Dr. Mohammad Noor Faraz
MBBS, FCPS
KMU, Peshawar

0347-9733311
0332-2002653

کلینک: روم نمبر 409 چوتھی منزل اکبر میڈیکل سنٹر رام داس چوک ڈگری گارڈن پشاور



۲۹

Dr. Bashir Ahmad

Assoc. Professor

Psychiatry Department Khyber Teaching Hospital Peshawar
MBBS, DPM, FCPS, CCST-England
Specialist Associate, Royal College of Psychiatrists England
Certified Medical Educationist, Oxford University England
Cognitive Behaviour Therapist, King's College London University
Ex Consultant Milton Keynes Hospital NHS England
PMDC Reg: 4996-N
GMC UK Reg No: 6104862

Dr. Ajmal Shah

MBBS - FCPS - I
Medical Officer

S.M. Alam Shah

Senior Social Medical Officer Name *Sajida* BEGUM () W/O HAJI NAJIB ULLAH Age 55 FEMALE
International Certified Addiction Professional (ICAP)
Address: PESHAWAR M. Status MARRIED Visit # 1
Incharge - Drug Abuse Treatment Center, KTH Peshawar.
BP: 120/80 Temp: Weight: 65kg Date Thursday, 24-Oct-2019
HCC Reg No: 05578

Complaint : C/O, forgetfulness, increased and irrelevant talks, singing songs and naats, passing comments on people, forgets things, generalized body aches and pains, restlessness, irritability, extensively investigated and treated with no response, taking multiple painkillers and even 2-3 injectables (voltral/ voren) for pain on daily basis for last 4 months. O/E: constantly talking, restless. Past hx: lamectomy done in 2016.

Investigations:

Provisional Diagnosis:-
Hypomania F30.0

سیریل	ادویات	مدت	استعمال	✓
1	Tab: Epival 250mg	جاری	کھانے کے بعد 1 + 1	✓
2	Tab. Espidone 2mg <i>veprolone 2mg</i>	جاری	ایک گولی رات کو	✓
3	Syp: Ceremine	<i>1 + 1</i>	1 + 1	✓
4	Syp. Tresorix Forte		کھانے سے پہلے 2 + 2 + 2	✓

دوبارہ معائنہ: 25-11-2019
1 ماہ

ضروری نوٹ:- آئندہ معائنے تک دوائی کا استعمال مسلسل جاری رکھیں
دوبارہ معائنے کے لیے ایٹ ہونے کی صورت میں نشان (✓) دوائی دوائی جاری رکھیں

NOT VALID FOR COURT

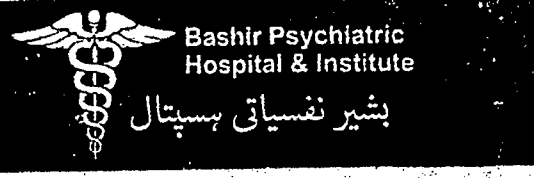
چھٹی بروز ہفتہ، اتوار

اوقات کار
3 تا 8 بجے شام

ایسوسی ایٹ پروفیسر
ڈاکٹر بشیر احمد

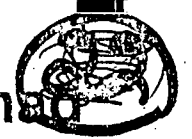
پتہ: آبدرہ چوک نزد PEF کالج یونیورسٹی ٹاؤن پشاور

ہوائی نمبرز پر رابطہ ضروری ہے۔ 0348-8078115 - 0304-6300738 - 091-2601160



19

Dr. Bashir Ahmad



Assoc. Professor

Psychiatry Department Khyber Teaching Hospital Peshawar
 MBBS, DPM, FCPS, CCST-England
 Specialist Associate, Royal College of Psychiatrists England
 Certified Medical Educationist, Oxford University England
 Cognitive Behaviour Therapist, King's College London University
 Ex Consultant Milton Keynes Hospital NHS England
 PMDC Reg: 4996-N
 GMC UK Reg No: 6104862

Dr. Ajmal Shah

MBBS - FCPS - I
 Medical Officer

S.M. Alam Shah

Senior Social Worker Office Name *Safwan* BEGUM () W/O HAJI NAJIB ULLAH Age 55 FEMALE
 International Certified Addiction Professional (ICAP)
 Address: PESHAWAR M. Status MARRIED Visit # 1
 Incharge - Drug Abuse Treatment Center, KTH Peshawar.
 BP: 120/80 Temp: : Weight: 65kg Date Thursday, 24-Oct-2019

Complaint : C/O, forgetfulness, increased and irrelevant talks, singing songs and naats; passing comments on people, forgets things, generalized body aches and pains, restlessness, irritability, extensively investigated and treated with no response, taking multiple painkillers and even 2-3 injectables (voltral/ voren) for pain on daily basis for last 4 months. O/E: constantly talking, restless. Past hx: lamectomy done in 2016.

Investigations:

Provisional Diagnosis:-
 Hypomania F30.0

سیریل	ادویات	مدت	استعمال
1	Tab: Epival 250mg	جاری	کھانے کے بعد 1 + 1
2	Tab.Espidone 2mg <i>vepinalone 2mg</i>	جاری	ایک گولی رات کو
3	Syp: Ceremine	<i>Handwritten</i>	1 + 1
4	Syp. Tresorix Forte		کھانے سے پہلے 2 + 2 + 2

25-11-2019 دوبارہ معائنہ:
 1 ماہ

دردی ٹوٹ کر آئندہ معائنے تک دوائی کا استعمال مسلسل جاری رکھیں
 بارہ معائنے کے لیے ایٹ ہونے کی صورت میں نشان (M) دوائی جاری رکھیں

NOT VALID FOR COURT

چھٹی بروز ہفتہ، اتوار

اوقات کار
 3 بجے شام تا 8 بجے

سی ایٹ پروفیسر
 کٹر بشیر احمد

پتہ: آبدارہ چوک نزد PEF کالج یونیورسٹی ٹاؤن پشاور

کے کیلئے آنے سے پہلے ان نمبرز پر رابطہ ضروری ہے۔ 0348-8078115 - 0304-6300738 - 091-2601160

ORDER.

C

20



UNDER SUB-SECTION-3 & SECTION 5 POLICE RULES, 1975

I, Deputy Commandant FRP, Khyber Pakhtunkhwa Peshawar as Competent Authority Charge Constable Waqas No.326 of FRP HQrs: is prima facie guilty of the following acts to be dealt with u/ 5 (3) of Police Rules, 1975.

While posted at FRP HQrs: Peshawar absented himself from duty w.e from 2.01.2020 till date without taking any leave/permission of the competent authority.

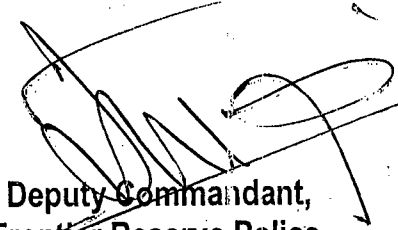
The act of delinquent Official falls within the ambit of gross misconduct and is liable to be proceeded under Police Rule 1975.

For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations. I, Deputy Commandant FRP, Khyber Pakhtunkhwa, being authorized officer hereby nominate enquiry officer as below to enquire into the charges within the meaning of 2(iii) under Police Rules 1975.

DSP Rafiullah /FRP

The enquiry officer after completing all enquiry proceedings should submit findings to the undersigned within stipulated period of (10) days per u/s 6(5) of the Rules.

Charge Sheet and Statement of Allegations are issued against the accused officer separately. Reply should be submitted before the Enquiry officer within the period of (07) days from the date of receipt.


Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.

No. 345 /PA, dated Peshawar the 04 / 03 /2020.

Encl: Papers (03) in Original.

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CHARGE SHEET U/S 6(1) (A) POLICE RULES 1975

You Charge Constable Waqas No.326 of FRP HQrs: Peshawar is hereby charged for committing the following omission/commissions.

While posted at FRP HQrs: Peshawar absented himself from duty w.e from 2.01.2020 till date without taking any leave/permission of the competent authority.

You are hereby called upon to submit your written defense against the above charges before the enquiry officer.

Your reply should reach the Enquiry Officer within seven (7) days from date of receipt of this Charge Sheet, failing which ex-parte action shall be taken against you.

Summary of allegations is enclosed herewith.

Deputy Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar

4/6/2020
2/1/20

17/1/20

پہنچا گیا ہے۔ (Received)

موب 0545-9737772

فیکس 17301-1244419-1

Received

سابقہ آوازوں (29) کا اصل پر 326/HRZ
صاحب عالی

بجی الرطاج سٹو کری آف ایلین فارم
صاحب ڈیٹیکٹنگ خاص طور پر درمات سے ملے۔ جن سے
کا چھوٹا بھائی علامہ صاحب کو ٹولنے پر ایک ہی وقت میں سہو کر
لینے کا عادی بن گیا ہے۔ اور جن سے اس نے اپنے گھر کا
دوا دے لیں ہیں۔ اور پھر کے علاج پر دوسرے دوا سے
میں نے کئی عرصہ پر ہے۔ اور یہ کئی عرصہ سے علامہ
کو سکر اوٹہ ڈرلج معاش میں ہے۔ جس کے علاج
معالجہ پر جن سے اس کا بہت زیادہ وقت اور لیسٹ
ہوا۔ جس کے سے جن سے اس نے دنیا پر لیا ہے
عینہ ہوا۔ درج بالا کے مسئلہ میں اس سے
جن سے اس کو عورتوں سے - 01-02-03 کا عرصہ 4/6/14

عمر کا پھر ہوا
لہذا ان صاحبوں سے بہت زیادہ روایت ہذا البتہ
ہے۔ کہ جن سے اس نے کئی بار کئی بار کئی بار کئی بار
وقت بیکار کرنے اور اتوار سے ملنے کرنے اور جن سے
کہ کئی عرصہ سے اس کے احکامات صادر فرما کر
ملا کر ہے۔

اللہ تعالیٰ سے دعا ہے کہ
اللہ تعالیٰ سے دعا ہے کہ
326/HRZ
Mob: 0345-9737772

E

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FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

I, Deputy Commandant, FRP, KPK as competent authority do hereby serve you Constable Waqas No.326 of FRP/HQrs, Peshawar.

(1) i- That consequent upon the completion of enquiry conducted against you by DSP FRP HQrs: Peshawar for which you were given full opportunity of hearing, but you failed to submit reply in response to the Charge sheet/statement of allegation and recommend you for Ex-parte action.

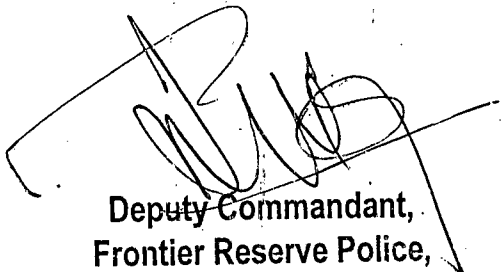
ii- On going through the findings/recommendations of the Enquiry Officers, the material available on record and other connected papers I, am satisfied that you have committed the following acts/omissions per Police Rules 1975.

You Constable Waqas No.326 of FRP HQrs: Peshawar absented yourself from duty with effect from 02.01.2020 to 04.06.2020 for the total period of (05) months and 02 days without any leave/permission of the competent authority. In this connection an enquiry was entrusted to DSP FRP HQrs: Peshawar, who after enquiry recommend you for Ex-parte action.

(2) Therefore, I, Deputy Commandant, FRP, KPK as competent authority has tentatively decided to impose upon you Major/Minor penalty including dismissal from service under the said Rules.

(3) You are, therefore, required to Show Cause as to why not the aforesaid penalty should not be imposed upon you.

(4) If no reply to this Final Show Cause Notice is received within fifteen days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and consequently ex-parte action shall be taken against you.


Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.

No. 804

/PA, Dated 11-06-2020

P 697
9-7-20

O.R.D.E.R.

F

24

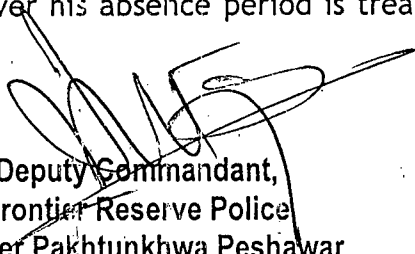
~~Handwritten scribble~~

This order will dispose off the Departmental Enquiry against Constable Waqas No. 326/5540 of FRP/HQrs: Peshawar.

Brief facts of the case are that Constable Waqas No. 326 of FRP HQrs: Peshawar, now drawing his pay from FRP Kohat Range, absented himself from duty with effect from 02.01.2020 to 04.06.2020 for a total period 05 months and 02 days without any leave/permission of the Competent Authority. In this regard, formal departmental proceedings were initiated and he was issued Charge Sheet alongwith Statement of allegations and DSP FRP HQrs Peshawar was nominated as Enquiry Officer. After enquiry, the Inquiry Officer submitted his findings, wherein he reported that Charge Sheet/Statement of allegation were duly served upon him, but he badly failed to submit reply within in stipulated period. At the end the Enquiry Officer has recommended the above named constable for Major Punishment. Upon the finding of Enquiry Officer, he was issued Final Show Cause Notice, but his reply was found not satisfactory. He was called in Orderly Room to justify his prolong absence, but could not produce any cogent reason in his defence.

In view the aforementioned facts, recommendations of the Enquiry Officer and other material available on record it has come crystal clear that the said Constable has deliberately absented himself from duty for a long period/time. From perusal of his past record it has been found that previously he remained absent from lawful duty for a period of 226 days on different times to which he was punished accordingly. Being a member of the discipline force, he does not take interest in his official duty. He is not fit for Police Active duty and there is no likelihood of become his good Police Officer in future.

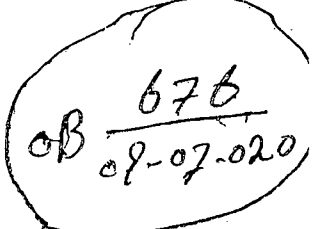
Keeping in view the findings narrated above, I, Malik Muhammad Tariq, PSP, Deputy Commandant FRP Khyber Pakhtunkhwa Peshawar being a competent authority is hereby awarded Major punishment of Removal from service to Constable Waqas No. 326/5540 of FRP HQrs: Peshawar under Police Rules 1975 amended 2014 with effect from 02.01.2020. However his absence period is treated as absence without pay.


Deputy Commandant,
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar

No. 1024-29 /PA dated Peshawar, the 09 / 07 - /2020.

Copy to the:-

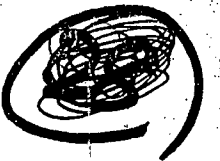
1. Worthy Commandant, FRP Khyber Pakhtunkhwa Peshawar for information please.
2. SP FRP Kohat Range Kohat.
3. Accountant /FRP/HQrs: Peshawar.
4. SRC/OASI/FRP HQrs: Peshawar.
5. FMC/ FRP/HQrs: Peshawar with original Enquiry file.


OB 676
08-07-20

ڈیپارٹمنٹل اپیل

G

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بخدمت جناب کمانڈنٹ ایف آر پی خیبر پختونخوا پشاور

درخواست بمراد منسوخی آرڈر ڈیپٹی کمانڈنٹ ایف آر پی

No. 10/24/29 PA Dated Peshawar To 09/07/2020

جناب عالی!

معروض خدمت ہوں کہ من ساکل سال 2014 کا بھرتی شدہ ہے۔ ساکل مورخہ 02-01-2020 تا 04-06-2020 تک 5 ماہ اور 02 یوم بوجہ گھریلو مجبوری غیر حاضر ہوا۔ ساکل کی مجبوری یہ تھی کہ من ساکل کی والدہ صاحبہ پر فالج کا ٹیک ہوا تھا اور شدید بیمار تھی۔ چونکہ ساکل گھر کا واحد کفیل ہے اور ہسپتال کی بھاگ دور، والدہ صاحبہ کی تیمارداری اور گھر کی تمام تر ذمہ داریاں ساکل کے ذمہ ہے اس وجہ سے ساکل ان آیام میں غیر حاضر رہا۔ بدیں وجہ ڈیپٹی کمانڈنٹ نے ساکل کو مورخہ 09-07-2020 کو سروس سے Removal کا آرڈر جاری کیا اور ساکل کو نوکری سے برخاست کر دیا۔ (میڈیکل کاغذات ہمراہ لف ہے)۔

لہذا آپ صاحبان سے بذریعہ درخواست استدعا ہے کہ ساکل ایک غریب گھرانے سے تعلق رکھتا ہے اور اس تنخواہ کے علاوہ ساکل کا کوئی دوسرا ذریعہ آمدن نہیں ہے اور بمشکل گھر کا گزارا ہو رہا ہے۔ لہذا من ساکل کی مجبوری کو مد نظر رکھ کر ساکل کو دوبارہ نوکری پر بحال کرنے کا حکم صادر فرما کر مشکور فرمائیں۔ ساکل عمر بھر دعا گو رہے گا۔

نوٹ Removal: آرڈر کی کاپی ہمراہ لف ہے۔

العبد:
وقاص احمد ولد سید اللہ خان

شناختی کارڈ نمبر: 17301-1244419-1

مورخہ 15 اگست 2021

فون نمبر: 0315-9737772

ORDER

E (26)



This order will dispose of the departmental appeal preferred by ex-constable Waqas Ahmad No. 326/5540 of FRP HQrs; against the order of competent authority, wherein he was awarded major punishment of removal from service on 09.07.2020.

Brief facts of the case are that the delinquent ex-constable was enlisted in police department on 01.09.2014. He remained absent from duty with effect from 02.01.2020 to 04.06.2020 for total period of (05 months and 02 days) without any leave or prior permission of the competent authority.

In this regard formal departmental proceedings were initiated against him as he was issued Charge Sheet alongwith Summary of Allegations and DSP FRP HQrs; Peshawar was nominated as Enquiry Officer to conduct proper enquiry against him. The Enquiry Officer submitted his findings, wherein he reported that Charge Sheet alongwith Summary of Allegations were duly served upon him, but he badly failed to submit reply within stipulated period. At the end the Enquiry Officer has recommended him for major punishment.

Upon the findings of Enquiry Officer, he was issued Final Show Cause Notice, to which he replied, but his reply was found unsatisfactory. He was called in orderly room to justify his prolong absence, but he could not produce any cogent reason in his defence.

From the perusal of his service record, it has been found that he was enlisted in police department on 01.09.2014 and previously he was remained absent from duty for a total period of (226) days on different occasions for which he was awarded various kinds of punishments, but failed to mend his ways.

Keeping in view the recommendation of Enquiry officer and other material available on record, he was removed from service vide Order Endst; No. 1024-29/PA, dated 09.07.2020.

Feeling aggrieved against the impugned order, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 06.07.2021.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. From perusal of enquiry file it has been found that the allegations were fully established against the applicant. It is settled proposition of law that the law helps the diligent and not indolent. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force and his reinstatement may impinge upon the over all moral and affect adversely the discipline of the force. Thus the instant appeal preferred by the applicant without any substance and there doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, and exercise of power, delegated to the undersigned vide office order No. 341-45/PA, dated 13.03.2019, being the competent authority, finds no substance in the appeal, therefore, the same is rejected and filed being meritless and badly time barred.

Order Announced.

checked by constable
" 11/21
Dy: Commandant
For Commandant FRP
Khyber Pakhtunkhwa, Peshawar

No. 5750-52/SI Legal, dated Peshawar the 16/10/2021.

Copy of above is forwarded for information and necessary action to the:-

1. SRC FRP HQrs; Peshawar. His service roll sent herewith.
2. Incharge Fauji Missal FRP HQrs; Peshawar. Fauji Missal alongwith D-file sent herewith.
3. Ex-constable Waqas Ahmad 326/5540 of FRP HQrs S/o Sami Ullah R/o Village

F

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To

The Commandant Frontier Reserve Police, (FRP)
Khyber Pakhtunkhwa Peshawar.

Subject

**MERCY PETITION
TO SIT ASIDE IMPUGNED ORDER.
No. 1624-29/PA dated 09.07.2020.**

Office of the Addl: IGP/Commandant
F.R.P. KPK Peshawar

Entry No. 8804 Encil 3

Date 24 / 11 / 20 21

R/Sir,

It is humbly request to your kind goodself that I have submitted the following few lines for your kind sympathetic consideration.

1. I was enlisted as R/constable in F.R.P Establishment on 1.9.2014 and was sent for basis recruit course at Police Training School, qualified with good position.
2. After qualifying the relevant prescribed course I, performed my duty very honestly with the entire satisfaction of my superior officer and there was no complaints an any conduct against me.
3. I am a young man trained Police Constable of 24/25 years of age with good physical health.
4. I was posted in F.R.P, HQrs, attached to FRP Kohat for purpose of pay.
5. During my service my real brother namely Kashif addicted in Narcotic etc smoker, due to his joining with bad characters persons in the society which brings very bad impression on my old age father and mother.
6. I am only one source of income to look after my family members for medical treatment.
7. In the meanwhile my mother seriously ill by heart attack, admitted for medical treatment. I requested for leave but no response given to my request, in matter of facts I in emergency reached to the hospital for medical.
8. I was marked absent and an enquiry to this effect anticipated against me.
The enquiry offier not given to me a chance for personal hearing as well as chance for self defense therefore I was removal from service on the recommendation of E.O for major punishment vide letter NO. 1024-29/PA dated 9.7.2020.
9. I preferred appeal for Re-instatement in service on 15 June 2021, but no due attention given to my appeal, rejected vide letter No. 5750-52/SI/Legal dated 16.7.21.
10. I am Graduate (B.A) highly qualified trained Constable having good moral character healthy with good physical and medical fit young boy.
11. I am only income source of my family. On removal from service become jobless seems no way to passed life in the present highly rates and to look after my old aged mother/father.
12. Moreover, during t he course of enquiry I was not given any chance for self defense and appear of self hearing before the competent authority. Neither given any chance for future nor my services taken into considerations.

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13. I have long service creditable having dues of E. leave etc on my service records.

14. In the circumstances as stated above I humbly submit the appeal to your kind goodself, to treat it sympathetically, provide me a chance to be careful in future and may kindly be re-instated in service, Counted my absences in the kind dues.

I shall be highly appreciated for your acts of kindness.

Waqas Ahmad

Waqas Ahmad
24/11

Waqas Ahmad
20/11/11

Your's Obediently,

Waqas Ahmad
Belt No. (previous)
326/5540
of FRP HQrs Peshawar
0345-9737772
0315-9737772