Form- A

FORM OF ORDER SHEET

Court of_____

1600/2022

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	Case	e No1609/2022			
S.No.	Date of order proceedings	Order or other proceedings with signature of judge			
1	2	3			
1-	11/11/2022	The appeal of Mr. Muslim Khan presented today by Mr. Saadullah Khan Marwat Advocate. It is fixed for			
	• • •	Mr. Saadullan Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on Notices be issued to appellant and his counsel for the date fixed. By the order of Chairman REGISTRAR.			
	• •				

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A. No. 1609 /2022

Muslim Khan

versus

CCPO & Others

5

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Through

Saadullah Khan Marwat Advocate 21-A, Nasir Mansion,

Appellant

Shoba Bazaar, Peshawar Ph: 0311-9266609

Dated 11-11-2022

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. 1609/2022

Muslim Khan

S/O Ghani-ur-Rehman

R/O Mayar Mardan,

Deputy Superintendent of Police,

Special Security Unit (SSU),

Versus

- Capital City Police Officer, Peshawar.
- 2. Provincial Police Officer, KP, Peshawar....

APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST OFFICE ORDER NO. 2154 DATED 20-09-2022 OF R. NO. 01 WHEREBY ADVERSE REMARKS AGAINST APPELLANT FOR THE PERIOD FROM 01-01-2021 TO 31-12-2021 WAS RECORDED I.E. NOT FIT FOR PROMOTION OR OFFICE ORDER NO. S/ 2682-83 / 22 DATED 08-11-2022 OF R. NO. 02 WHEREIN REPRESENTATION OF APPELLANT WAS FILED / REJECTED FOR NO LEGAL REASON:

Respectfully Sheweth;

1. That appellant was initially appointed as Constable in the year 1988 and was promoted to the rank of Head Constable in the year 1996. The said process was in-vogued when in the year 2003, he was further promoted to the rank of ASI, followed by further promotion ih the rank of Sub-Inspector in the year 2008. In the year 2011, appellant was promoted to the rank of Inspector and then on satisfactory performances of official duties, promoted to the rank of Deputy Superintendent of Police (DSP) in the year 2017.

- That finally appellant was posted to the post of DSP, LRH on 21-10-2021 as Incharge of the post for general checking of the vehicles as well as general public.
- 3. That at the same time, two different bodies, i.e. Police Personnel's and retired army personnel's was supervising LRH security but the personnel's of both the bodies have different criteria of checking. Numerous complaints of different types were recorded in Daily Dairies against the retired personnel's against the Army as their behavior was not per standard / mandate with patients and general public. Every dairy is self explanatory and requires worth consideration since 21-10-2021 till 18-03-2022. (Copies as annex "A")
- 4. That on 25-03-2022, DSP City-I Sub Division Peshawar wrote letter to Administrator LRH Peshawar about the lethargic behavior and attitude of Hazrat Khan who was right hand of the Director retired Brigadier for creating problems abusive language against police for taking action against him. He made quarrels with patients as well as general public which proof is available in shape of medical evidence. (Copies as annex "B")
- 5. That the said security guard namely Hazrat Khan made conspiracy with the Director of the hospital against appellant and then he made complaint to high-ups of the Police and as a result of the said complaint he was not only transferred from the hospital but R. No. 01 recorded adverse remarks against appellant for the period from 01-01-2021 to 31-12-2021, "not fit for promotion" vide order dated 20-09-2022. (Copy as annex "C")
 - Here it would be not out of place to mention that the said remarks of the year 2021 were not communicated to appellant well within time but after more than nine (09) months the same were communicated to him.
- 6. That on 03-10-2022, appellant submitted representation before R. No. 02 for expunction of the adverse remarks which was rejected / filed on 08-11-2022 without any reason and justification. (Copies as annex "D" & "E")

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Hence this appeal, Inter Alia, on the following grounds;

GROUNDS

- a. That no complaint, whatsoever, of the parent department was made against appellant in performance of his official duties but it was another quarter on whose instance, such remarks were recorded in ACR.
- b. That Director of the hospital was a retired Brigadier and he deputed his own retired personnel's of the establishment for the purpose of security of the hospital but numerous incidents took place where visitors lodged complaints against them.
- c. That the said retired Brigadier made complaint to R. No. 02 to transfer appellant from hospital and a result, he was transferred on 22-04-2022 from the hospital to the office of R. No. 01.
- d. That on the said complaint, R. No. 01 recorded remarks:-
 - "Fitness for promotion...... Not fit for promotion". Which remarks were at the behest of others and not the concerned.
- e. That police personnel's has its own course of checking as against that of Armian's and due to none familiarity with civilians many problems were created, resulted into lodging of complaints against the personnel's of forces.
- f. That before recording the said remarks, neither any explanation was called for from appellant nor any warning or counseling was made but straight away recorded the adverse remarks for no legal reason.
- g. That the subject matter was pertaining to the year 2021 and it was the duty of the authority to convey the said ACRs within one month but after two years, the same were conveyed to appellant which has no legal value in the eyes of law.
- h. That the case against appellant was not dealt with as per the mandate of law, so the same are not only based on malafide rather on behalf of a retired personnel which has no legal value.

It is, therefore, most humbly prayed that on acceptance of the appeal, the impugned adverse remarks dated 20-09-2022 and 08-11-2022 of the respondents be not only set aside but the same be removed from personal dossier of appellant, with such other relief as may be deemed proper and just in circumstances of the case.

Moveli Il' Appellant

Through A "Il sh Khur Saadullah Khan Marwat

11 Arbab Salful Kamal

Amiad Nawa Advocates

的复数神秘

Dated: 11-11-2022

CERTIFICATE:

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

Advocate

AFFIDAVIT

I, Muslim Khan S/O Ghani-ur-Rehman, DSP (SSU) Peshawar (appellant), do hereby solemnly affirm and declare that contents of Service Appeal are true and correct to the best of my knowledge and belief.

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··*" . infonicial 3 ، ملاب نه jsaj · le la le d'hunge versie ili union العسيد في المالي المراج المراج المنا المناس المالي المراج المراج المراج المراج المراج المراج المراج المراج الم المحالية المرابي المرابي المرابي المحالية المحالية المحالية المعالية المعالية المعالية المحالية and 200 find a me all in the sure as the sure of the s 200 minor. 101 or 1 01 00 (0) (6 m p) (2 m) 101 11 1 5 6 m) 50 (2) 00 E 11. 75 120 13 or minge

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22- 3lin 8,0 جوک راز ملح ف در $\frac{1}{22} \frac{1}{22} \frac{1}{2} \frac{1}{2} \frac{1}{2} \frac{1}{2} \frac{1}{2} \frac{1}{2} \frac{1}{2} \frac{1}{2}$ الحرا حصر تع تر ١٦٦ كر من ورك ولي المرجون لسات مسرح بأري سرح ولما المرح بالري كم ورين رايل المل المروحير عزم الناس الرسم عون عالم قوري في الله المريحة أن كم الحليم المردوس فن لسلك ما توجد في المراح ولا سب في تبريح وسر س تقول جاج في المروس خفر المروس فاحد فر من vic المر لول مردس كارو و الحصام كو دركما ما تو من دورا. مرد ال خرون الم الان اور حوث الا مراج دخار ب ول ت حادف مر مرد ب مانیس کرنا شروع کر تے اور بردل می دھا دی وسره تر آب سراس نس رست من نام کس ورا بس ملی کو بی ن ورا تو در کون می هار ساقد في افراق دوند استال كما . من هر داخ والزن ن جمير قمل طاحف مركم فرا جري لو ورد الرائون الموران علم لع حوف عن نے ولی کے حلوف عن را علاقی با بس کی اور مرا علاق جادہ مراب بر کی مرتبی س ے کو ش کیا اور ہر تھوٹ نہ کے توعیم دو ترکار اصلات کا رو الی کیا۔ دور ال اصلا در الدر ناح ک اف إلى والا الحدوث سرار ما كماجة مس حذم الست مان مون مر كابر

2013 ماع دوم من علوماً ال أو الم كنادر الم ما علي أو 1835 كم مكان كالم فرهو 312-9971580 ز» حرفت تي فور بر ص Car حال مرقدوس ونس دروس سوس الدعم ملاق م دعله المخ الا من ابن الد فول ما ي سف المر حرج حوت مان جوم انسب ديني فينان اللية كارون جلي الدر المع المرين د في المحرق سال الورد د في المحرق سال لور درج كادتها ليس ك في فعلى كالاللام الاللام كالفت ورب في والم ما ما لي كو حاصية قدن النوط مربع الجدي المسالة ما جرم الم جرم الفراك لوم و الفروم ل الله موے بھی ترک ولی وہ رہ ہے جا میں تعریب المرز المرز المرز المرز المراز کا ولی جا المرک کا رول ہے لیے لیے لیے الم

183 31-19 Ro بر المحلم $= \frac{1}{2} \frac$ والسي تر رور ال كشت حيران الم و السي الم المعان الله اللي الله حرك في در الم المن موسو (شري فقل المرام في المراحي من من المراحم ولا رامير جان معرف US petulo par in uz an in proprieto أخارى ندار توسي المولى في المرك في المرك فور من تساف الأكما قياجر مرتب من فران الراب الراب من الماني الماني الحلي الماني الماني في المرابي في المرابي في المرابي في المرابي في الم ر المراجع المراج المراج المراجع WEIN الورد درج في ع حود مرديت دين برص حالي المردين إلى الاسم اجتماركم عالي C/W) 322 1 فى فال حود عمر عن الطواني تحضير المو لموك ولو را معلق الجور الحر فالدر الح مرك أور او المالا 3-20 ار HRU - يال الطعير فرير v طرير فوت من الما ما يمقاً. الحرب درج در ماج من -

בוייזוטו: פוייזוטו: DSP Chy معروض خدمت الول - كما LRH پشادر على بر التويت سيكور في كارة حشريت خان جو ك نهایت بداخلاق اور بد زیابی مخض ایب بروروان کمی نام کمایت اوالی جنگوی کر تا اور مخله بولیس، آدمی و غیر وف خاف نازید زبان استعال کر تاب ور اکثر اوقات مرکاری ملازمان کے ساتھ لڑوتی جنگڑے بھی کر تاب حضرت خان ک اس المدام كى وجدت LRH بشاور جو كمداريك فهايت المم اداروب في طان من بدنام ورب قل التفح ظلاف تلاد بذاش بتكايات موجود سيت يتولقت دديني أستستانتها أستدعائي كم جعيرت خالات كالمتواني كرك قمام انسانول يرادهم كرب اللااي بركردار شخص كياوجه LRH كالتمله بدنام ودار Car SHO PS KRS 18-3-022 Ginherotec DSP (15)



OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE, CITY-I SUB-DIVISION, PESHAWAR.



25-3-22

___/Steno, dated Peshawar the $\frac{25}{2}$ /2022.

To: The Administrator, Lady Reading Hospital, Peshawar.

No.

Subject: IMMORAL/ABUSIVE BEHAVIOR/ATTITUDE OF SECURITY GUARD HAZRAT KHAN AT LRH, PESHAWAR.

Memo:

It has been reported **(report attached)** by SHO PS Khan Raziq Shaheed that Hazrat Khan who is performing his duties as security guard at Lady Reading Hospital, Peshawar. His attitude and behavior with the general public are not good. He also uses abusive language against the Police and the Pakistan Army, which create a lot of problems and also effect the reputation of Lady Reading Hospital. Many complaints have been received from the general public which have been entered in the Daily Diary vide DD No. 9, dated 18-03-2022, No. 08, dated 22-02-2022 and. No. 08, dated 17-03-2022, PP Khyber Bazar.

It is, therefore, requested that take action against him.

Deputy Superintendent of Police, City-I Sub-Division, Peshawar.

No.1069-70 /St,

Copy of the above is forwarded for information to the:-

Deputy Superintendent of Police, LRH, Peshawar.

- . Superintendent of Police, City, Peshawar.
- 31

Deputy Superintendent of Police, City-I Sub-Division, Peshawar.

11 12-4-22 **NCY DEPARTMENT** LADY READING H MEDICAL TEACHING I K02220923371 PESHAWAR, KHYBER PA HWA 12-APR-22 19:19:53 NURNA : KO200022245915 Name : Muhammad Shahab Age: 28 Year(: Gentari Male District : Pestroway Father / Hisband Name : USMAN GUL 92786 Visit Type : Acute Emergenc Department : EMERGENCY Serial No. Charater: KAMRAN JOHN PEMERGENCY RX Complaints: HX enf Allagric Physical Assault. Bruiscein Ri Cellp. (Modizier Side) NO Other obions wound Findings: N. a Complais B Iclean No Loc (Fits Norrity Jas. Fonglex - P 10 - 171 \mathbb{C} Quelson -> p , C D = ----Investigations: Krany RA Cage ور المحرفة 107 Dyil, aprolic spin Diagnosis: Next Visit: Consultant Name: Signature: DSP-SECURIT

12 12-4-22 27-ما بخ مت مقدم 22 ه الرت مده مر الما رج رفت رام من والم من حرار الموت ~ 19.30 ب 2 و فوس میں تعلی لیے میں الملا کے و مرمت فتلبصرية ماسم مكانه عام جمع في شبع و لرحما ن م م و وسال فر / مرمند ب الاس منا) باری مهما می وی ارز از می جا مسیم می جند می می می می و از از می در مارد از مرد با می او می در مارد از مارد از مرد با می او می در مارد از مارد المخار فالم المالة المرقم من وا حراج 16 is lung ر کر Juli 2 i, d cille up محمد من من مارز سم نکال دری وی می از از من سم نکال دری وی می از از من ~ in the 25.16/ ويتر فقر ساي تى زر Enel فى جساك م 1 in on our and ع الاسان م , 15 m En Ci cilini C. 56 Jula of alfinin to pri thet 12 2022 **DSP-SECURIT** LRH-Peshawa

}3 33 Book # 100LADY READING HOSPITAL .34 Page # MTI PESHAWAR USINCI GUI Age 28 US Sex (M) Cast Oct Mro Shahats Occupation 12. Apailed Son of 19:19 P. Name No. -__Date of examination___ Lachken Kay Name of relative/friend_ Residence. Particulars of injuries or symptoms, in case of poisoning HX EL Allaques Physical Assaud 12. April 202 No other other would -12:19 Po Date and hour of arrival No. and date of Police docket فا در مذار 6 No. and date of constable Cyls: Bhs Date of admission_____ if admitted Date of discharge Date and hour of report sent to police Orray Rolling /PD , OMLOPRANC / EPL te Jurther refere - ter nationlar court of despatch of articles sold alvina avidana -le nesition The ۵۱٬۰۰۱ م Altested Co ·L^{qH}· 1. Nature of injuries 14122 The kind of weapon used poison suspected in the or dangarous) (Shuuto, arlev 30 min DSP-SECURITY LRH-Peshawa TOI in Private case Pold to the in Police Case Examining Madical Office A fee of Rs. No fee received Modical Officer. b Impression of Private Party Signature of Thu or Smils 1ch Examining Medical Offic 20. _of_ Date _ MLC-MRD/LRH/001

14 12-4-22 33 919162 go (3 28 /00 2142-6/ilu Vie 212 m 26 Cmin (= w) ? 51,05 los λο'ριg 12-4-2022 1.0 (Unil) $\frac{1}{8}$ Athenty

O, Julit By صل شراحر 18 00 13 is 18 he kΩ. راد و الم مراج الم الم وقت 35 17 مرد بي 12 مرد المراج الع مراح الع مراح الم مراح الم الم مرتب الم الم مرتب الال بادى منظر 173 مى عامد تسط مى موجود تى تدارى دورال مكر فى مازر الى مارد عنون الما من ور الى كمات وتكرم بى علم اور مردائر حفرت مى موجود مقارك شخص مى شهما ب ولدعوان ظرر ب مقبل محر رسم رور مور مران روز بران كما تم تخص بالاع من او المسيد مردي ك كوسيس ورا حما عرا روت در ان ی وه سلومی ی انہوں شارا کر صر والدام میڈ سل 2° وار سل کر کر در سل ک اوركافى سېرسى جالت مىن بى كىكىن ئالاكى رى دىلار بى دىن دىن بې تەتقى دورىجى مەررى كىس ھوڑ مس مقس مرمد محصي لامت كليون مع فردكوب كما حسكى وحد مصصر حب ع مس ستد مد ورد سورا س دور محص محدی المل در دش س دس دوران حس دی دان تو ترد در در در در س السخص كومس فرض ركما من ترمي من ترمي من ترميري مرد الم دي جادي كذر اس الم ماري قالوى فالوى فالور محيد في في طالة حسبي من عشقل ولافي ران في الما تروي المما الولسي عما در الدرس السرى من ومن وفن عمل می جان مرض فظهر ان کوئ کم مدارک خالونی مسلم میں کسی تر باقتر مرک ور الم وم م فرد م فرد م فراون كر مراج من كر سك ماد مكر راج د الم الم من ف الد كم مقرون است متربد رسی شخص کو زرکوب کرنا شروع کی شخص متا شری رس خراندی معاقمه جا خوان مع سراران تو تقمد صرر سراین خریدی زاند کو سیسی کن جانے کا لور ص حسب میں حمور رمی تمکن صب حما محا روانی عمل من لایی واقع رس کر میں در ای واقع رس کر مغری سی واقع ف مشیل من روز وی شیخ مر روسا می روز ان معر مرون کا ساتور شانی ماری اور جوار ب مراس في كرفيرون والم مروت 22 رور الحري -22 مراه رور الحري مرد المراحي مرد المراحي مرد المراحي مرد الم

ادر انگر شری صحبی عراد ای الور شیس الرو خران ما مراد می از این مرابع از می مرابع ا اور وتكرش ي صحبى عراصان العرب الما روانش افسرال بالاك خدمت من السلال كى طابى من حاليال and of Attested بعد: **** Smonplen DSP-SECURIT LRH-Peshawar 12-04-022

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12-4-22 EMERGENCY DEPARTMENT ADY READING HOSPITAL MEDICAL TEACHING NAME SUM PROM: 20 PESHAWAR, KHYBER PAKWEWHKHWA02220923313 18:34:55 Invoice Date: 12-APR-22 Name : Shah Oasand : K0200022245885 District : Peshawar Age: 50 Year(# Serial No. 80229 Aller: Male Husband Name : MISAL KHAN (106) APPLY BUSIAS bolow Lever ment · EMERGENC The Acole Emerg Complaints Pari hi Rf Had my. T.T. I im SI Thank ho l Findings: Tas Ton flex + 105 Dayun 12 BP-140/80-5 Investigations: Qalseen - (Taris Taris فی روز ایر O مراح With the Tresterner 1 4/101 phr Diagnosis: DSP-SECURIT LRH-Peshawe Signature: Consultant Name: Next Visit: _ ELETER PLATER SID WEITELEHAWWWWIIIHEOVAILS

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12-4-22 EMERGENCY DEPARTMENT ADY READING HOSPITAL MEDICAL TEACHING AND UT PEDA: 20 PESHAWAR, KHYBER PAKHEHMKHWAK02220923313 18:34:55 Invoice Date: 12-APR-22 Name : Shah Oasand HO: K0200022245885 District : Peshawar Age: 50 Year(s Serial No. 80229 Husband Name : MISAL KHAN Dopartment · EMERGENCY wente Emergeni Counter : EMERGENCY 16) Apply plyles below lence Complaints. Paul Wi RFH -a Č my. T. T. I mist 1 vane A-SD Findings: Tas Towfler -14 Mars Dayen F. BP-140/8 Investigations: Rallien 1125 USBAR BAR 2 U O ~ 17 A/21 0 **Diagnosis:** DSP-SECHE LRH-Peshawa Signature Next Visit: Consultan# Name: Electro 22012400 ារចេះនាទេសារបារាដែរ-៤០ាអារាភ **E**

2.2 EMERGENCY DEPARTMENT LADY READING HOSPITAL MEDICAL TEACHING IAIS TITU PEDA: 20 PESHAWAR, KHYBER PAKWEWHKHWAC02220923313 18:34:55 Invoice Date: 12-APR-22 Name : Shah Oasand District : Peshawar Age: 50 Year(: •.der: Male Serial No. 80229 Set Husband Name : MISAL KHAN Acute Counter : EMERGENCY (106) APPly BUSLAS below N lence Complaints! Pati hi Rf Hall mj.T.T.Ims ASD Findings: Tas Tovofler (+ Nas Daujen 29 BP-140/80 Investigations: Ralsaniel and Trees فی روز ان O ما ۵ 1101 **Diagnosis:** DSP-SECT LRH-Peshawar Next Visit: tant Name: Signature เอารัตกอะอีนแห่งออ VERSIGENOWARD

Bills, Gilder Dong $(1_{0}, b_{1}, c_{2}, c_{3}, c_{1}, c_{1},$ · Ula Lo $\frac{1}{22}$ in the weather of the second of the weather of the بر الم الحار جرال المار المراب المار المس عمالي وما لي في and the adaministic is the adamin alle and الى معران منكرانى تختر بالمح في تنز دار جا في سے دارى مى ن ب فرسمان الحق مسلمان و بری فر می اس شخص في ولين في ولين في الم الماني - محبوبر مان سي فارز) كم الرو $-\frac{1}{2} \frac{1}{2} \frac{1$ Av 21 22 Cud Mice So Ciero 200 (v) colyber 1) 2 مصلاق محد مرازين عارزي و شما برن مر سرال خوارش ملاق Unit sall and the sall and she HUN DSP-SECMENTY Star 6:28 pm LRH-Pesherran have 6:28 pm

- 6785, 611 de 1 ver Jons بر) مهر 1 Jug Lie $\frac{C_{2}}{2} \int 12 \frac{6^{5}}{22} + \frac{1}{22} \frac{1}{22} + \frac{1}{$ in in the second of the second مربعاتا- در الرجون ورال الرزيج بالراسي عالي من ف الى مول مركول من خو مر شرد ما و سرد از مى مى ن شخص بالم المح الم المحالي - محدير مان سر مارزى كوراز $-\frac{1}{2} - \frac{1}{2} - \frac{1$ Mille Culy mice For Sur is in it is in the second of the former in the second of the s معلق محرب فارت ی رستی مرت می جرد ان می خوانس کالا U. j. b. i jog . W. a. Fir i ver U. 12-04-22-11 W/W/ 12-04-22-11 Plan elucion Edución of 12/2/2 elucion Comt -0345 612/660\$ 17/01-1530764-3 DSP(Secution Truic gacharge MLC Take DSP(Secution Truic gacharge MLC Take DSP(Secution Truic gacharge MLC Take DSP-SEATORIEN 250 PM DSP-SEATORIEN EN 612/4/22 MAL



OFFICE OF THE GENERAL OF POLICE, KHYBER PAKHTUNKHWA CENTRAL POLICE OFFICE, PESHAWAR. Phone: 091-9210927 Email: sceretbranchepo9@gemail.com

No. S/ <u>2154</u> /22, dated Peshawar the <u>2019</u>/2022

To :

The Capital City Police Officer, Peshawar

Subject:-

PER / COMMUNICATION OF ADVERSE REMARKS

Memo:

In the Performance Evaluation Report on the working of DSP Mr. Muslim Khan for the period from 01.01.2021 to 31.12.2021, it has been mentioned that:-

REMARKS OF COUNTERSIGNING OFFICER (CCPO PESHAWAR)

PART-IV

7.

Fitness for Promotion...... Not yet fit for promotion

PART-V

COUNTERSIGNING OFFICER EVALUATION

DSP Muslim Khan had a very average performance. He was reported against by the head of Khyber Teaching Hospital and subsequently did not show any improvement while posted in Lady Reading Hospital. Moreover, he took any responsibility assigned to him very casually.

The above adverse remarks may please be conveyed to the officer concerned in order that he may remedy the defects. Representation if made should be sent not later than one month from the date of receipt of this communication.

The ack: as token of the receipt of this memo: may be obtained from him on the attached duplicate copy of this communication and returned to this office for placing in his Character Roll Dossier.

1:12012 filling WorksLetters

(DR! XH), PSP A'HÌD ULL

AIG/Establishment, For Inspector General of Police, Khyber Pakhtunkhwa, Peshawar

20-9-22

Special Security Unit (CPEC) Khyber Pakhtunkhwa, Peshawar.

20 109/ 2022

No. 987 JAS, dated Peshawar the

Subject: PER/COMMUNICATION OF ADVERSE REMARKS.

Enclosed please find herewith adverse remarks in PER of the then DSP/Security LRH:, Peshawar Muslim Khan now posted in (CPEC) for the period from 01.01.2021 to 31.12.2021.

23

The adverse remarks may please be deliver upon him and duplicate copy of the same may please be return to this office duly signed by the DSP concerned for onward submission to CPO.

FOR CAPITAL CITY POLICE OFFICER, PESHAWAR

NU. /AS,

Memo:

Copy of above is forwarded to Supdt:Secret CPO for information to his letter No.S/ 2151/22, dated 20.09.2022.

FOR CAPITAL CITY POLICE OFFICER, PESHAWAR

3-10-22

The Inspector General of Police Khyber Pakhtunkhwa, Peshawar.

Subject:

Adverse remarks of the countersigning officer (CCPO Peshawar) against order No.S/2154/22 dated 20.09.2022 of my honour whereby the same was recorded as not yet fit for promotion in the ACR.

Respected Sir,

2)

3)

4)

6)

- That appellant has in his credit 34 years unblemished service wherever he was posted, he performed his duty upto the standard.
 - That finally appellant was posted as Security Incharge in the office of CCPO, Peshawar but due to general threats to hospitals, he was deputed to LRH Peshawar on 23.11.2020 for security measures.
 - That Director of the hospital was a retired Brigadier and he deputed his own personnels for the purpose but many incidents took place where the visitors lodged complaints against the personnels.
 - That the said Brigadier made complaint to PPO to transfer appellant from the hospital and as a result, he was transferred on 22.04.2022 from the hospital to the office of CCPO, Peshawar.

5) That on the said complaint, your honour wrote remarks:-

"Fitness for promotion ----- not yet fit for promotion" vide letter dated 20.09.2022.

That as stated earlier, police department has its own course of checking, while the Army has his own one and due to not familiarity with civilians, many problems were created resulting into lodging of numerous complaints by the civilians against the retied personnels of forces.

- 7) That anyhow, neither any explanation was called for from appellant, nor any warning or counseling was made to him and straightaway recorded the aforesaid adverse remarks in the ACR.
 - That the matter was pertaining to the year 2021. It was the duty of the authority to convey the said ACR within one months but after two years, the same was conveyed to appellant which has no legal value in the eyes of law.
- 9) That the matter was not dealt with as per the mandate of law. So the same is not only based on malafide rather on behalf of retired personnels. So is of no legal effect.

It is, therefore, most humbly requested that the impugned adverse remarks dated 20.09.2022 of my honour be set aside and appellant be let to perform his official duties to the best of abilities. The same be removed from his personal dozier and obliged.

Thanking you Sir,

Almin 20:

Muslim Khan s/o Ghani-ur-Rehman DSP (SSU) Balakot. Cell: 0301-8980968 0315-9966157

Dated: 03.10.2022

8)

OFFICE OF THE INSPECTOR GENERAL OF POLICE, HYBER PAKHTUNKHWA CEN RAL POLICE OFFICE, PESHAWAR. Phone: 091-921092 Email: secretbranchepo9@gnuil.com

No. S/ 2682 - 83 /22, Dated Peshawar the 8 / 11 /2022.

<u>ORDER</u>

This order pertains to the representation preferred by DSP Muslim Khan of CCP Peshawar for the expunction of Adverse Remarks contained in his ACR for the period from 01.01.2021 to 31.12.2021 recorded by the countersigning officer. Comments were also obtained.

After going through the relevant record, comments and material on ground the Adverse Remarks recorded in his ACR for the period from 01.01.2021 to 31.12.2021 are maintained and his representation is hereby filed/rejected.

Sd/-Addl: IGP/HQrs: For Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

8-11-22

Endst: No. & date even.

Copy of above is forwarded for information and necessary action, to the CCPO Peshawar w/r to his memo: No. 1095/AS, dated 24.10.2022. Necessary entry into this effect may also be made in his Duplicate Character Roll Dossier. The applicant may also please be informed accordingly.

2. Supdt: "E-I" Branch, CPO.

(IRFAN ULLAH KHAN). PSI AIGAPstabhshment, For Inspector Opperat of Police. Khyber Pakhtunkhwa, Peshawa

<u>OFFICE OF THE CAPITAL CLIPPELLICE OFFICER PESHAWAR</u>
No. 1113 /AS, dated Peshawar the 8/11/2022.
Copy of above is sent for information and necessary action t
tha:-
1. Commandant, Special Security Unit,(CPEC),Khyber/Pakhtunkhwa,Peshawar.
OR CABIAL CITY POLICE OFFICER,
FLONAWAR K-141

ليت المرين ومن مسمون مرين المرين والمرين المور المرين الموري مسمون المرين المرين المرين المرين المرين in the interest with the server of the serve متن يسمن جيمنوان بالامين ابنى طرف واسط يبرجري وحضاب دمي وكل كاردا كما متعلقة أن مقام لبتادير مسيس المستحد أيأس حان سرويت الثوكيط بإني كورط كروتس مقرر كرم إفرار كماجا سير رما ح تموضح مقدمة كم كم كارواتي كاكارل اينة يار سجيمًا يُسبر في ل صاحب كوكرية دايني الدوتغرز نالت و^{لا}يعها يرتكف مين توار د اي اورا د بال د مونى اور بعد وز داري كريم اجرا و اور د موركى جرك وروبيه اور برموى اور در در در در د م و من تقارین ا در اس میر مشتخط کرایز کا اخانیار تر این استر معترض عدم میروی یا داگری مکبط فیریا ایل کی برآن گی مرتب می تقارین ا در اس میر می مشتر منا اخانیار تر ایک از اخانیار تر می از می میروی یا داگری مکبط فیریا ایل کی برآن گی اور سرمنی استر داد مرسبته این تکران در نظرایی و مبردی مرسنه کا اختیار برسطا ا در به سورت هرور بنه مقدم مذکر ر یے من یا بندی من داری سے داریں اور دس یا مشار قانون کو اپنی برام یا اپنی بجائے کھڑر کا است ارتباع کر کھڑا۔ سیے من یا بندیوں کاردائی سے دارینا اور دس یا مشار قانون کو سپنی بجرام یا اپنی بجائے کھڑر کا است ارتباع ا ورصاحه بمقرر شده شر كوجن و بن جمله مذكورة بالا الفته بالات عاصل مول شير الوراس كالمساخسة بيرف من متفاور قبول مبيئه ما و دوران مقدمه ب حويض جبه ديم عانه الهوا دميند بير مسبب مي ما اس مستحق و^ريل ^{هرا و} سر مرضوف مبدل سے تسیر لبغایا دخرسید کی وصولی کر نے کامیں اختیار کر کا اگر کو کی قاریح باشتی مقام مردرہ بر مرد با مدس المر الو الدوكيل حاصب با بند نه المرل من كه ببروى مدكور كركي -لمنا وكالت نامه دكمه دماكه سدرسي . المرقوم - 11 - 11 المتر الم - int Mont- Re. الجد لواز الأويب ا