

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR
AT CAMP COURT D.I.KHAN

Service Appeal No. 1491/2020

Date of Institution ... 11.03.2020

Date of Decision ... 29.09.2022

Khalid Nouman S/O Abdur Rehman, Constable No. 8017/FRP, Dera Ismail Khan, R/O Basti Dhapa Wali, Tehsil & District Dera Ismail Khan.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs Department, Peshawar and four others.

... (Respondents)

MR. SAEED ULLAH MUGHAL,
Advocate

For appellant.

MR. MUHAMMAD ADEEL BUTT,
Additional Advocate General

For respondents.

MR. KALIM ARSHAD KHAN
MR. SALAH-UD-DIN

CHAIRMAN
MEMBER (JUDICIAL)

JUDGMENT:

SALAH-UD-DIN, MEMBER:- Precisely stated the facts surrounding the instant service appeal are that departmental action was taken against the appellant on the allegations of absence from duty and he was consequently removed from service vide order dated 06.05.2019 passed by Superintendent of Police FRP D.I.Khan Region, D.I.Khan. The departmental appeal as well as revision



petition filed by the appellant were also rejected, hence the instant service appeal.

2. Notices were issued to the respondents, who submitted their comments, wherein they denied the assertions made by the appellant in his appeal.

3. Learned counsel for the appellant has argued that absence of the appellant from duty was on account of his illness, which fact has not been considered by the competent Authority; that the appellant had taken plea of illness in his departmental appeal but the same was not probed into by the appellate Authority; that no show-cause, charge sheet as well as statement of allegations were issued to the appellant and he was not even provided any opportunity of personal hearing or self defence; that inquiry proceedings were conducted in violation of mandatory provisions of Police Rules, 1975, therefore, the impugned order of removal of the appellant from service is not sustainable in the eye of law. In the last he requested that the impugned orders may be set-aside and the appellant may be reinstated in service with all back benefits.

4. On the other hand, learned Additional Advocate General for the respondents has argued that the appellant had previously remained absent from duty on so many occasions and his total previous absence was for a period of 753 days; that the appellant was previously awarded several minor punishments as well as major punishment of removal from service on account of his absence from

duty, however his departmental appeal was allowed and he was reinstated in service; that after reinstatement in service, the appellant did not mend his ways and again remained absent from duty for a considerable long period without any leave or prior permission of the competent Authority, therefore, disciplinary action was taken against him in accordance with relevant rules; that a regular inquiry was conducted against the appellant by affording him opportunity of personal hearing as well as self defence; that the appellant in his reply to the charge sheet had not taken any plea of illness and had just taken a lame excuse that his absence was on account of certain domestic problems; that the appellant was a member of a disciplined force, however he was in the habit of remaining absent from duty without any leave or permission of the competent Authority, which amounted to misconduct; that the appellant has admitted his absence from duty and had not put forward any plausible reason for his absence, therefore, he has rightly been removed from service; that the departmental appeal of the appellant was time barred and he has also not filed his service appeal within the statutory period of 30 days, therefore, the same is liable to be dismissed on the ground of limitation alone.

5. Arguments have already been heard and record perused.

6. A perusal of the record would show that departmental action was taken against the appellant on account of his absence from duty.

Mr. Zahoor-ud-Din Khan DSP FRP D.I.Khan was appointed as inquiry officer for conducting inquiry in the matter. Show-cause

notices as well as charge sheet and statement of allegations were issued to the appellant, who personally received the same and had submitted replies to the show-cause notices/charge sheets issued to him. In his replies, the appellant has admitted that he remained absent from duty without any leave or permission of the competent Authority. The appellant has though alleged in his appeal that he had remained absent on account of illness, however in his replies to the show-cause notices/charge sheets, the appellant has not at all taken any plea of illness. It appears that the plea of illness of the appellant is an afterthought effort for creating justification for his willful absence from duty, therefore, the same is not worth consideration. Nothing is available on the record, which could show that the appellant had even bothered to submit any application to his high-ups for leave. The appellant being a member of a disciplined force, had remained absent from duty for considerable long period without any leave or permission of the competent Authority, which amounts to misconduct.


7. While going through the record, it has been observed that the appellant throughout his service had remained in the habit of remaining absent from duty without sanctioned leave or permission of the competent Authority. According to the record annexed by the respondent alongwith their comments, the appellant had previously too remained absent from duty for a total period of 753 days on various occasions. Besides, several minor punishments, major punishment of removal from service was also previously awarded to


the appellant vide O.B No. 215 dated 22.03.2018, however his departmental appeal was then allowed and the same was converted into minor punishment of stoppage of three annual increments without cumulative effect. The service history of the appellant is depicting a grim picture of his amenability towards service discipline, therefore, he is not entitled to any leniency in quantum of penalty awarded to him.

08. Consequent upon the above discussion, the appeal in hand being without any merit stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

29.09.2022


(KALIM ARSHAD KHAN)
CHAIRMAN
CAMP COURT D.I.KHAN

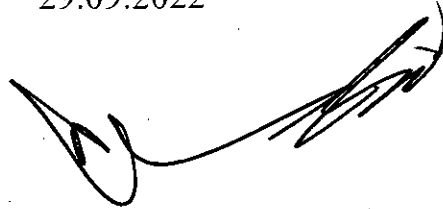

(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT D.I.KHAN

ORDER
29.09.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present. Arguments have already been heard and record perused.

Vide our detailed judgment of today, separately placed on file, the appeal in hand being without any merit stands dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
29.09.2022



(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan



(Salah-Ud-Din)
Member (Judicial)
Camp Court D.I.Khan

27th September, 2022

Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Additional Advocate for respondents present.

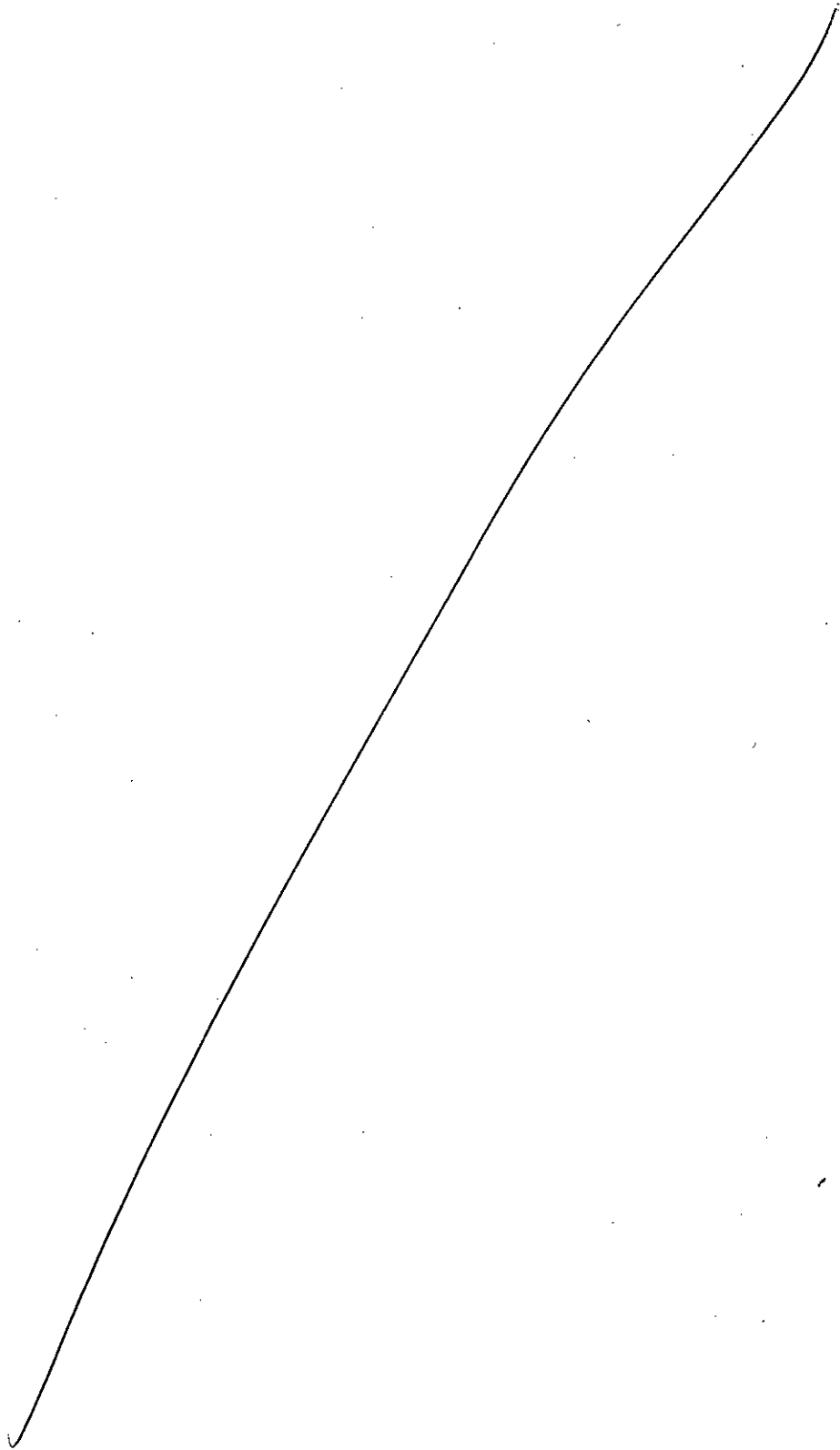
Arguments heard. To come up for consideration and order on 29.09.2022 before the D.B at Camp Court D.I.Khan.



(Salah Ud Din)
Member (Judicial)
Camp Court D.I.Khan



(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan



27.01.2022

Tour to Camp Court D.I.Khan has been cancelled. To come up for the same on 27.06.2022 before S.B.



Reader

27th June 2022

Appellant in person present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Zubair, Reader for respondents present.

Written reply/comments on behalf of the respondents have been submitted which is placed on file. A copy of the same is also handed over to the appellant. To come up for arguments on 25.07.2022 before B.B at camp court D.I.Khan.



(Kalim Arshad Khan)

Chairman

Camp Court D.I.Khan

25.7.22

Due to summer vacation the case is adjourned to 26-9-22 for the same.



26.09.2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant sought short adjournment on the ground that he has not gone through the brief of the instant appeal. Adjourned. To come up for arguments on 27.09.2022 before the D.B at Camp Court D.I.Khan.



(Salah-ud-Din)
Member (Judicial)
Camp Court D.I.Khan




(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

S.A No. 1491/2020

30.09.2021

Nemo for the appellant.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as his counsel and to come up for preliminary hearing before the S.B on 25.11.2021 at Camp Court D.I.Khan.

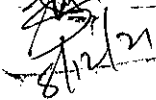

(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT D.I.KHAN


25.11.2021

Learned counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration, hence the appeal is admitted to regular hearing subject ^{to} all legal objections including the question of limitation. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 27.01.2022 before the S.B at Camp Court D.I.Khan.

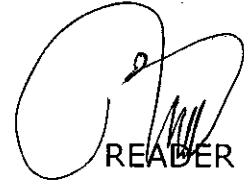
Appellant Deposited
Security & Process Fee


25/11/21


(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

29.10.2020


Since 30.10.2020 has been declared as public holiday on account of Eid Milad-ud-Nabi, therefore, to come up for the same on 24.11.2020 before S.B at Camp Court, D.I.Khan.



READER

24.11.2020


Appellant in person present and made a request for adjournment as his counsel is not available. Adjourned. To come for preliminary arguments on 26.01.2021 before S.B at Camp Court, D.I.Khan.



(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

26.01.2021

Due to Covid-19, case is adjourned to 24.02.2021 for the same as before




Reader.

24.02.2021

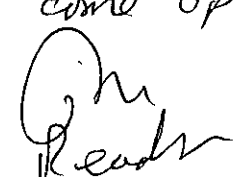
Counsel for appellant present.

He made a request for adjournment. Adjourned. To come up for preliminary hearing on 27.05.2021 before S.B at Camp Court D.I.Khan.



(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

Due to covid, 19 therefor to come up for the same on 30/9/21



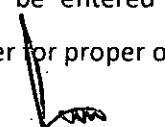


Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1491 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/03/2020	<p>The appeal of Mr. Khaled Noman received today by post through Mr. Saeed Ullah Mughal Advocate may be entered in the Institution Register and put up to the Learned Member for proper order please.</p> <p style="text-align: right;"> REGISTRAR 11/3/2020</p>
2-	14-9-20 25.09.2020	<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>25-9-2020</u></p> <p style="text-align: right;"> MEMBER</p> <p>Appellant with counsel present with a request for adjournment. Adjourned. To come up for preliminary hearing on 30.10.2020 before S.B at Camp Court, D.I.Khan.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J) Camp Court, D.I.Khan</p>

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

Service Appeal No. 1491/2020

Khalid Nouman(Appellant)


VERSUS

Govt. of KPK etc(Respondents)

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6	Copy of departmental appeal and order dated <i>19/07/2019</i> , show cause notice, reply of charge sheet, order sheet and final report - <i>order 23-8-2019</i>	"G, H, I, J, K & L"	25-35
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Your Humble Appellant


Khalid Nouman
Through Counsel

Dated: *02/03/2020*


SAEED ULLAH MUGHAL
Advocate High Court,
Dera Ismail Khan.

P-01

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

Service Appeal No. 1491/2020

Khyber Pakhtukhwa
Service Tribunal

Diary No. 1756

Dated 11/03/2020

Khalid Nouman S/o Abdur Rehman, Constable No. 8017/FRP, Dera Ismail Khan, resident of Basti Dhapa Wali, Tehsil & District Dera Ismail Khan.

.....(Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs Department, Peshawar.
2. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Inspector General of Police, Dera Ismail Khan.
4. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
5. Superintendent of Police (FRP), Dera Ismail Khan Range, Dikhan.

.....(Respondents)

**SERVICE APPEAL UNDER SECTION 4
OF KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT 1974 AGAINST THE
REMOVAL FROM SERVICE ORDER
DATED 06/05/2019 BY RESPONDENT
NO. 4 VIDE WHICH APPELLANT HAS
BEEN REMOVED FROM SERVICE.**

PRAYER:-

Filed to-day
[Signature]
Registrar
11/03/2020

**ON THE ACCEPTANCE OF INSTANT
APPEAL, THE ORDER DATED
06/05/2019 OF RESPONDENT NO. 4
MAY PLEASE BE SET ASIDE AND
APPELLANT MAY PLEASE BE
REINSTATED IN HIS SERVICE WITH
ALL BACK BENEFITS.**

Respectfully Sheweth:-

Brief facts giving rise to instant appeal are as under:-

- 1- That appellant is a law abiding citizen and permanently reside in District Dera Ismail Khan.
- 2- That appellant was appointed as a constable in FRP Dera Ismail Khan by the Khyber Pakhtunkhwa Government on 02/01/2010. Copy of service card is enclosed as **Annexure "A"**.
- 3- That during service performance of appellant, remained upto the mark.
- 4- That during service, appellant proved himself as dutiful and no complaint whatsoever was made against appellant from his highup.
- 5- That appellant was suffering from the illness of pain in his back bone and was unable to walk. Doctor conducted checkup of appellant and advised appellant to take long and complete bed rest and also forbade appellant to pick weight due to which appellant could not go on duty. Copies of medical certificates and charge sheet are enclosed as **Annexure "B & C"**.
- 6- That however appellant submitted his various leave application, during different times when appellant was unable to perform him duty due to pain in back bone, but applications for leave of appellant were not entertain by respondents without intimation to appellant. Photocopies of applications and statement of allegations are enclosed as **Annexure "D, & E"**.
- 7- That finally appellant received his removal from service order dated 06/05/2019 by respondent No. 4. Copy of order is enclosed as **Annexure "F"**.

8- That no show cause notice Under Rule 5(3)(b) KP Police Rules 1975 was served upon appellant and no opportunity of hearing was given to appellant he was not charge sheet and he was even no opportunity of reply was given to appellant, which is against law and justice. Appellant submitted departmental appeal to I.G and Commandant but all in vain and I was called not in order by room for appearance mentioned in impugned order, appellant condemned unheard. Copy of departmental appeal and order dated 06/05/2019, show cause notice, reply of charge sheet, order sheet and final report are enclosed as Annexure "G, H, I, J, K & L".

9- That the appellant feeling aggrieved from the impugned order of the respondents authority, hence the instant service appeal on the following grounds:-

GROUND:-

- a) That the impugned order is against law, facts and circumstances of the case as the appellant never remained absent from duties.
- b) That the impugned order is against principle of law and service rules and establishment Code.
- c) That the respondents authority never conducted inquiry against the appellants and the impugned order has been passed in slip shed manner and never sustainable in the eyes of law.
- d) That the appellant was never personally heard before passing the impugned order of dismissal of

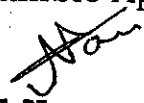
the appellant not codal formalities were fulfilled before issuing impugned order of removal.

e) That appellant belong to a poor family and has to look after and bear the education expenses of his school going children and appellant has to look after his old parents.

f) That the Counsel of the Appellant may very graciously be allowed to add further grounds during the course of arguments.

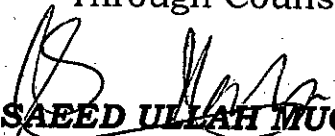
In wake of the submissions made above, it is humbly prayed that on the acceptance of instant appeal, the order dated 06/05/2019 regarding removal from service of appellant may please be set aside and appellant may please be reinstated in his service with all back benefits.

Your Humble Appellant



Khalid Nouman
Through Counsel

Dated: 02/03/2020



SAEED ULLAH MUGHAL
Advocate High Court,
Dera Ismail Khan.

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

Service Appeal No. _____/2020


Khalid Nouman(Appellant)

VERSUS

Govt. of KPK etc(Respondents)

AFFIDAVIT

I, **Khalid Nouman** S/o Abdur Rehman, Constable No. 8017/FRP, Dera Ismail Khan, resident of Basti Dhapa Wali, Tehsil & District Dera Ismail Khan, the appellant, do hereby solemnly affirm declared on oath that contents of the above **Appeal** are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal. Furthermore, the above said service appeal resubmit on the direction of registrar.


Advocate R.O.S.A.C.
Oath Commissioner
D.I.Khan. Adv


DEPONENT

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

C.M No. _____/2020

In Service Appeal No. _____/2020

Khalid Nouman(Appellant)

VERSUS

Govt. of KPK etc(Respondents)


**APPLICATION FOR CONDONATION OF
DELAY BY FILLING THE ABOVE TITLED
APPEAL.**

Respectfully Sheweth:

- 1). That the above titled appeal is filling today before this Honorable Tribunal.
- 2). That the Petitioner applied for attested copies to concerned officials, but the same not provided within time. Therefore, the officials copies of required documents was provided to petitioner on 28/02/2020, and on the same date the petitioner is filling the above titled appeal thus the delay may kindly be condoned, if any.
- 3). That this Honourable Court has got vast power to entertain the instant appeal.

It is therefore, humbly prayed the instant application may kindly be accepted.

Your Humble Appellant


Khalid Nouman
Through Counsel

Dated: 02/03/2020


SAHEB ULLAH MUGHAL
Advocate High Court,
Dera Ismail Khan.

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BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR.

C.M No. _____/2020

In Service Appeal No. _____/2020

Khalid Nouman(Appellant)

VERSUS

Govt. of KPK etc(Respondents)

AFFIDAVIT

I, **Khalid Nouman** S/o Abdur Rehman, Constable No. 8017/FRP, Dera Ismail Khan, resident of Basti Dhapa Wali, Tehsil & District Dera Ismail Khan, the appellant, do hereby solemnly affirm declared on oath that contents of the above **application** are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal.

[Handwritten Signature]

DEPONENT

[Handwritten Signature]
Advocate, P.O. & A.C,
Oath Commissioner
D.I. Khan

Annexure "B"

P= (9)

D.H.Q TEACHING HOSPITAL D.I.KHAN

Out Door Patients Department

Date 09/12/2018

Yearly No 28783

Name Ali Ali

Disease Diabetes

Rs 10/-

cf.
Pain
in back
person

- 1) B. UNIX 1000
- 2) B. Tintadgil 20
- 3) P. Caprol 2

Acute aphus
Bed Rest for 05 Days

Senior Medical Officer
D.H.Q Hospital Khan

[Signature]

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D.H.Q TEACHING HOSPITAL D.I.KHAN

Out Door Patient,s Department

Date 21/12/2018 Yearly No 101951

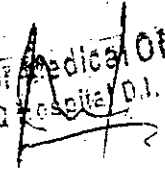
Name Jilani

Disease Abtush Rs 10/-

g/c
 Anti
 pain
 - Tumor
 - Bone
 - Joint

ke 2
 1) Dorsal
 2) B factor
 3) P...
 1 1/2

Advised a plus
Bed Rest for 10 days

Senior Medical Officer
 D.H.Q. Hospital D.I. Khan


~~Handwritten scribble~~
P-11

D.H.Q TEACHING HOSPITAL D.I.KHAN

Out Door Patient's Department

Date 14/01/2019 Yearly No 4211

Name Umera

Disease Amoebiasis Rs 10/-

cf. 1
Insured
1- B. Vitamin SA
2- Sp. Peptone
3- B. Jantar
Amoebiasis
By R + 07 Day

Senior Medical Officer
D.H.Q Hospital D.I. Khan

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D.H.Q TEACHING HOSPITAL D.I.KHAN

Out-Door Patient's Department

Date 28/01/2019 yearly No 3636

Name Umer No

Disease ADAMBER Spine Rs 10/-

1/2
 Anji
 2/2
 2/2
 3/2
 4/2
 5/2
 6/2
 7/2
 8/2
 9/2
 10/2
 11/2
 12/2

Senior Medical Officer
 D.H.Q Hospital D.I. Khan
 2

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D.H.Q TEACHING HOSPITAL D.I.KHAN

Out Door Patients Department

Date 28/02/2019

yearly No. 30 123

Name

Umer Ali

Disease

Admission

Rs 10/-

of 75 L
 Antipar AL
 = B. AVONIK 20
 1 + 10
 = B. D...
 = 90 capsules
 2 L

Advised to take Bed
 Rest for 45 Days

Senior Medical Officer
 D.H.Q Hospital, Khan

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D.H.Q TEACHING HOSPITAL D.I.KHAN

Out Door Patients Department

Date 28/04/2018

Yearly No 11.604

Name

Ullah

Disease

Diabetes

Rs 10/-

10
Acti
Pau

Te
B. K. Lodi 2

10
Pau

S. A. Lynt
B. J. N. D. B

St. P. K. H

Admission slip
Bed Re Ad

Senior Medical Officer
D.H.Q Hospital D.I. Khan

419-20 /FRP

Annexure "C"

P-15

dated: 07-03 /2019

CHARGE SHEET

I, Aman Ullah Khan, SP FRP DIKhan as competent authority, am of the opinion that you Constable Khalid Noman No.8017/FRP of FRP DIKhan Range have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.

II. According to daily diary reports vide mad No.46 dated 13.12.2018, No.42 dated 07.01.2019 of FRP HQrs: Peshawar, you remained absented yourself from Refresher Course with effect from 09.12.2018 to 13.12.2018, 21.12.2018 to 07.01.2019 total (21) day respectively, similarly according to daily diary reports vide mad No.16 dated 21.01.2019, No.27 dated 07.02.2019 of District Police Lines DIKhan, you remained absent from law full duties with effect from 14.01.2019 to 21.01.2019, 28.01.2019 to 07.02.2019 total (17) days, **total absence period comes (38) days** respectively without any leave or permission from the competent authority.. It is a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules 1975 and has rendered yourself liable to be proceeded against departmentally.

III. By reason of the above, you seem to be guilty as sufficient materials is placed before the undersigned; therefore it is decided to proceed against you in general police proceeding.

IV. You are; therefore, required to submit your written reply within 07 days of the receipt of this charges sheet to the Enquiry Officer.

V. Your written reply, if any, should reach the Enquiry Officer within specific period, failing which it shall be presumed that you have no defense to offer and in that case ex-parte action shall follow against you.

VI. Intimate as to whether you desire to be heard in person or not?

VII. A statement of allegation is enclosed.

[Handwritten signature]

11-3-19

[Handwritten signature]
(Aman Ullah Khan)
Superintendent of Police, FRP
DIKhan Range DIKhan

DSP. FRP. NO. 009

07-3-2019

گھنٹوں کا ٹیبلٹ FRP - KPIK لپٹاؤ

پروٹسٹ کر رہا ہے۔ مابٹ بیماریاں لکھ کر دیا
میں نے میڈیکل پورٹوں - کانسٹیبل 8017
FRP

دیکھ لیا

توڑ دیا۔ کانسٹیبل کے لئے لکھ کر دیا
پہلے کون سے نام لکھے۔ اور پھر کانسٹیبل کے لئے لکھ کر دیا
توڑ دیا۔ کانسٹیبل کے لئے لکھ کر دیا
لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
اور اسے لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
میں نے لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
دیکھ کر لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
دیکھ کر لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا

2۔ یہ پورے پورے لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
دیکھ کر لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
میں نے لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
دیکھ کر لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
دیکھ کر لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
دیکھ کر لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
دیکھ کر لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا
دیکھ کر لکھ کر دیا۔ کانسٹیبل کے لئے لکھ کر دیا

24-06-19

8017
FRP
0345-642-9999

خدمت صبا کونسل کے FRP کا کارڈ اور
P=17

عنوان = درخواست طراد وصول تقورات

فکے 1-6-P

صدا عالی :- سائل صبا ذیل طرفین کے ساتھ

1. سائل 1-6-P صاحب کونسل درخواست اصل
کی ملازمت رائی کی ہے۔ صبا 1-6-P اصل

فکے مورخہ 8-2019-23 کو صبا درخواست
2. یہ سائل کونساں تقورات فکے وصول نہیں ہوئی ہے

3. سائل صبا بالی سائل کون تقورات فکے جاری فرمائے
جائیں۔ درخواست تقورات صبا صبا کونسل کے
سائل انکا منگور

مورخہ 5-9-2019

ڈاکٹر عثمان ولد عبدالرحمن کاسٹریل 18017

FRP

ڈسٹرکٹ سیکریٹری

0345-6429999

درخواست برای وصول نفوذات حکم ۱-۶۱

صناب عالی: سائل خود بابت عرفین برسان

۱۱) که سائل در این باره حکم عالی ملازمه صناب
عزت قار ۱-۶۱ کوکزاری کنی - چونکه
صناب سید چکانی -

۱۲) سائل خود در این نفوذات صناب وصول نہیں ہوگی

خود بابت الیہا میں ہے کہ سائل کو نفوذات حکم ۱-۶۱
فاری فہرے حاصل - سائل الیہا تا زینت مشکورہ
۶ - نیز در نفوذات وصول داخل نہیں لاندگی

۰۳-۱۰-۲۰۱۹

فاری فہرے و دیگر عرفین کا رسید
۲۰۱۶
FRP
۰۳-۱۰-۲۰۱۹

عرفین کا رسید
۰۳۹۵-۶۹۲-۹۹۹۹

P-10
P-19
P-20
S.P. K.R.R. ضلع منٹون
15/10/2019

عنوان = درخواست برائے حصول تقویت

صنایعی: سائیکل موٹر کارخانہ منٹون ضلع منٹون

اس کی سائیکل موٹر کارخانہ کے لیے سائیکل موٹر کارخانہ منٹون ضلع منٹون
منٹون ضلع منٹون سائیکل موٹر کارخانہ کے لیے سائیکل موٹر کارخانہ منٹون ضلع منٹون
منٹون ضلع منٹون سائیکل موٹر کارخانہ کے لیے سائیکل موٹر کارخانہ منٹون ضلع منٹون

اس کی سائیکل موٹر کارخانہ کے لیے سائیکل موٹر کارخانہ منٹون ضلع منٹون
منٹون ضلع منٹون سائیکل موٹر کارخانہ کے لیے سائیکل موٹر کارخانہ منٹون ضلع منٹون

اس کی سائیکل موٹر کارخانہ کے لیے سائیکل موٹر کارخانہ منٹون ضلع منٹون
منٹون ضلع منٹون سائیکل موٹر کارخانہ کے لیے سائیکل موٹر کارخانہ منٹون ضلع منٹون

سید اوردینہ ارشد علیہ السلام سائیکل موٹر کارخانہ منٹون ضلع منٹون
منٹون ضلع منٹون سائیکل موٹر کارخانہ کے لیے سائیکل موٹر کارخانہ منٹون ضلع منٹون

تاریخ 2019-11-04

8017

ضلع منٹون سائیکل موٹر کارخانہ منٹون ضلع منٹون

1110000

Star

کثرت صا - P - FRP - صا لکھنؤ ڈیپارٹمنٹ
P-20

عنوان = درخواست برائے حصول تقویت
صنعتی ا. گ. پ.

① جناب عالی = عودیا زرہ ڈیپارٹمنٹ کے مسائل
نے عالی صلاحیت کی وسیلے P - G - P کو گزارے تھے۔
صفا فکم ہو چکا ہے۔

② سائل کو تقویت کا حال نہ معلوم ہے جسکی تیار
سائل نے صبا صاحبہ کے درخواست گزارے ہوئے ہیں
اور درخواست گزارے کے لئے گزارے ہوئے ہیں
سائل کو نا حال تقویت نہیں مل رہی ہے۔

اب جناب سے استفسار ہے کہ سائل کو تقویت
کاری فرمائی جائے گی یا نہیں
شکر ہے۔

5-12-2019

فالتحان ولد عبدالرحمن صاحب
8017

تذکرہ جناب S.P. - F.R.P. سہیل

20

P-18

P-21

عنوان = درخواست برائے تقویت خدمت
P.G.A. سہیل

جن عالی در گزارش حسب ذیل ہے

11

1. یہ مسائل نے بجلی کی خدمت سے P.G.A. سہیل

کیا درخواست کی ہے۔ جو کہ مندرجہ ذیل ہے۔

2. یہ مسائل تمام تقویت حاصل نہیں ہوئی ہیں

3. یہ مسائل قبل ازین درخواست برائے گزارش

کی ہے۔ جو ابھی تک مسائل کو تقویت نہیں مل سکی ہیں

4. مذکورہ گزارش ہے کہ حصول تقویت

کی درخواستیں منطوری طور پر جاری تقویت
کا یہ فریضہ ہے۔

08-d-2020

فائدہ نواز ملک عبدالرحمن کانسٹیبل
8017/2020
9999

Annexure "E"

P-22

DISCIPLINARY ACTION

Aman Ullah Khan, SP FRP DIKhan as competent authority, am of the opinion that you Constable Khalid Noman No.8017/FRP of FRP DIKhan Range of FRP have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.

STATEMENT OF ALLEGATION

1. According to daily diary reports vide mad No.46 dated 13.12.2018, No.42 dated 07.01.2019 of FRP HQrs: Peshawar, you remained absented yourself from Refresher Course with effect from 09.12.2018 to 13.12.2018, 21.12.2018 to 07.01.2019 total (21) day respectively, similarly according to daily diary reports vide mad No.16 dated 21.01.2019, No.27 dated 07.02.2019 of District Police Lines DIKhan, you remained absent from law full duties with effect from 14.01.2019 to 21.01.2019, 28.01.2019 to 07.02.2019 total (17) days, **total absence period comes (38) days** respectively without any leave or permission from the competent authority. It is a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules 1975 and has rendered yourself liable to be proceeded against departmentally.
2. For the purpose of scrutinize the conduct of said Constable with reference to the above allegation, Zahoor Ud Din Khan DSP/FRP DIKhan is appointed as Enquiry Officer.
3. The Enquiry Officer shall conduct proceeding in accordance with provision of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record it is finding and make with twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official.
4. The delinquent official shall join the proceeding on the date, time and place fixed by the officer.

[Handwritten signature]
[Handwritten signature]

011-3-19

[Handwritten signature]
(Aman Ullah Khan)
Superintendent of Police, FRP
DIKhan Range DIKhan
[Handwritten initials]

Annexure

F

P-23

POLICE DEPARTMENT

ORDER:-

My this order will dispose off departmental enquiry conducted against **Constable Khalid Noman No.8017/FRP** under Khyber Pakhtunkhwa Police Disciplinary Rules-1975 (Amended in 2014).

According to daily diary reports vide mad No.46 dated 13.12.2018, No.42 dated 07.01.2019 of FRP HQrs: Peshawar, he remained absented himself from Refresher Course with effect from 09.12.2018 to 13.12.2018, 21.12.2018 to 07.01.2019 total (21) day respectively, similarly according to daily diary reports vide mad No.16 dated 21.01.2019, No.27 dated 07.02.2019 of District Police Lines DIKhan, he remained absent from law full duties with effect from 14.01.2019 to 21.01.2019, 28.01.2019 to 07.02.2019 total (17) days, total absence period comes (38) days respectively, similarly according to daily diary report No.29 dated 08.02.2019 of FRP HQrs: Peshawar, he absented himself from Refresher Course with effect from 08.02.2019 to 24.03.2019 total (44) days total absence period comes (82) days, similarly according to daily diary report No.31 dated 08.04.2019 of Police Station Saddar DIKhan, he remained absent from law full duties with effect from 08.04.2019 to till date without any leave or permission from the competent authority.

On the basis of above he was served with show cause notices. He was required to submit his reply of said show cause notices within stipulated period but he failed to do so. He was issued Charge Sheet along with summary of allegation. Zahoor Ud Din DSP/FRP DIKhan Range was nominated as enquiry officer to unearth the actual facts. After completion of all formalities the enquiry officer submitted his findings report along with other supporting papers wherein the defaulter constable was found guilty of the charges leveled against him and recommended his absence period may treated as without pay. He was called in orderly room since 28.03.2019 but he does not appear before the undersigned.

From perusal of his service record it revealed that he was enlisted as Constable on 02.01.2010, during his service he remained absent from law full duties for (753) days, awarded minor punishment of confinement to quarter guard for 19 days, extra drill for 05 days, fine Rs.7000/- also removed from service and reinstated in service by the competent authority previously. His previous record shows that the defaulter Constable habitual absentee.

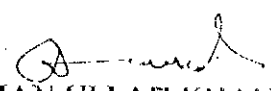
Keeping in view the facts stated above, I MR. AMAN ULLAH KHAN Superintendent of Police FRP D.I.Khan Range, D.I.Khan, in exercise of powers vested in me under Khyber Pakhtunkhwa Police Disciplinary Rules-1975 amended-2014 hereby taking ex parte action against **Constable Khalid Noman No.8017/FRP** awarded major punishment of **Removal from service** from the date of his absence i.e 09.12.2018. His absence period from 09.12.2018 to 13.12.2018, 21.12.2018 to 07.01.2019, 14.01.2019 to 21.01.2019, 28.01.2019 to 07.02.2019, 08.02.2019 to 24.03.2019 total (82) days, 08.04.2019 to till date is treated as without pay.

ORDER ANNOUNCED.

Dated 06-05/2019.

OB No. 338 /FRP

Dated 06/05/2019


(AMAN ULLAH KHAN)
Superintendent of Police,
FRP, DIKhan Range DIKhan.

Copy to:-

1. Pay Officer
2. SRC
3. OHC

P = 24

.....Better Copy.

Police Department

Order-

My this order will dispose off departmental enquiry conducted against Constable Khalid Noman No. 8017/FRP under Khyber Pakhtunkhwa Police Disciplinary Rules 1975 (Amended in 2014).

According to daily diary reports vide mad No. 46 dated 13/12/2018, No. 42 dated 07/01/2019 of FRP HQrs; Peshawar, he remained absented himself from refresher course with effect from 09/12/2018 to 13/12/2018, 21/12/2018 to 07/01/2019 total (21) day respectively, similarly according to daily diary reports vide Mad No. 16 dated 21/01/2019. No. 27 dated 07/02/2018 of District Police Lines DIKhan, he remained absent from law full duties with effect from 14/01/2019 to 21/01/2019, 28/01/2019 to 07/02/2019 total (17) days, total absence period comes (38) days respectively, similarly according to daily diary report No. 29 dated 08/02/2019 of FRP HQrs. Peshawar, he absented himself from Refresh Course with effect from 08/02/2019 to 24/03/2019 total (44) days total absent period comes (82) days, similarly according to daily diary report No. 31 dated 08/04/2019 of Police Station Saddar DIKhan, he remained absent from law full duties with effect from 08/04/2019 to till date without any leave or permission from the competent authority.

On the basis of above he was served with show cause notices. He was required to submit his reply of said show cause notices within stipulated period but he failed to do so. He was issued charge sheet along with summary of allegation. Zahoor Ud Din DSP/FRP DIKhan Range was nominated as enquiry officer to unearth the actual facts. After completion of all codal formalities the enquiry officer submitted his findings report along with other then papers wherein the defaulter constable was found guilty of the charges leveled against him and recommended his absence period may created as without pay. He was called in orderly room since 28/03/2019 but he does not appear before the undersigned.

From perusal of his service record it revealed that he was enlisted as Constable on 02/01/2010, during his service he remained absent from lawfull duties for (753) days. Awarded minor punishment of confinement to quarter guard for 19 days, extra drill for 05 days, fine Rs. 7000/- also removed from service and reinstated in service by the competent authority provision. His prevision record shows that the defaulter constable habitual absentee.

Keeping in view the facts stated above, I Mr. Aman Ullah Khan Superintendent of Police FRP DIKhan Range, DIKhan, in exercise of powers vested in on under Khyber Pakhtunkhwa Police Disciplinary Rules 1975 amended 2014 hereby taking ex parte action against Constable Khalid Noman No. 8017/FRP awarded major punishment removal from service from the date of his absence i.e 09/12/2018. His absence period from 19/12/2018 to 13/12/2018, 21/12/2018 to 07/01/2019, 14/01/2019 to 21/01/2019, 28/01/2019 to 07/02/2019, 08/02/2019 to 24/03/2019 total (82) days 08/04/2019 to till date is treated as within pay.

Order announced.

Dated 06/05/2019

OB No. 338/FRP

Dated 06/05/2019

Aman Ullah Khan
Superintendent of Police
FRP, DIKhan Range DIKhan.

Copy to;-

1. Pay Officer,
2. SRC
3. OHC

49 SD
5-8-2019

کمیونٹی ایسوسی ایشن کے لیے ایکشن پلان - KPK

رقم استناد کے لیے - ایس ایل برائے کالی - FRP - 8017

بیت بنیاد کے لیے رقم کی درخواست

کالی

گزارش - ایس ایل برائے کالی - FRP - 8017

بیت بنیاد کے لیے رقم کی درخواست کے لیے ایس ایل برائے کالی

بیت بنیاد کے لیے رقم کی درخواست کے لیے ایس ایل برائے کالی

بیت بنیاد کے لیے رقم کی درخواست کے لیے ایس ایل برائے کالی

بیت بنیاد کے لیے رقم کی درخواست کے لیے ایس ایل برائے کالی

بیت بنیاد کے لیے رقم کی درخواست کے لیے ایس ایل برائے کالی

بیت بنیاد کے لیے رقم کی درخواست کے لیے ایس ایل برائے کالی

بیت بنیاد کے لیے رقم کی درخواست کے لیے ایس ایل برائے کالی

بیت بنیاد کے لیے رقم کی درخواست کے لیے ایس ایل برائے کالی

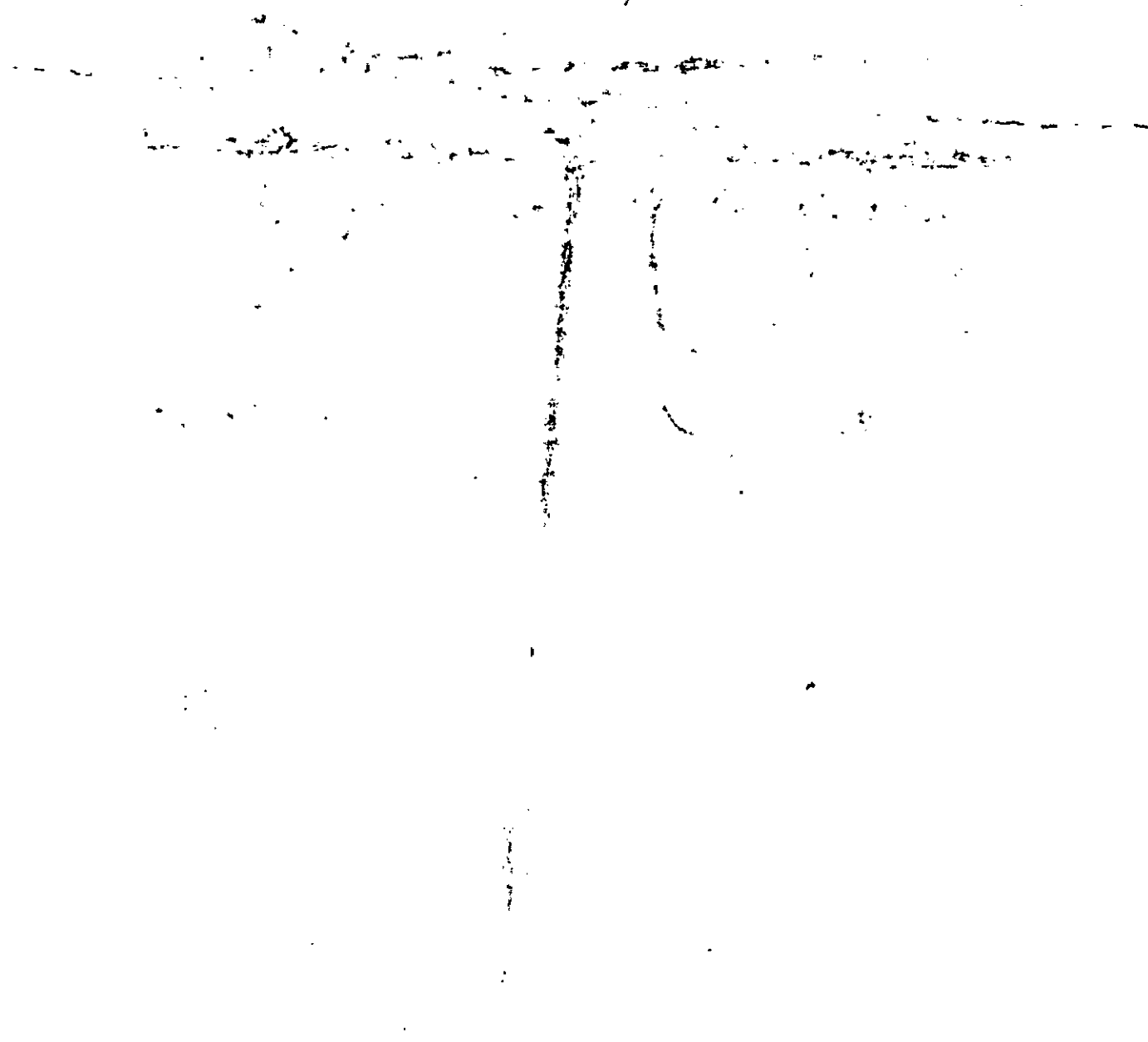
بیت بنیاد کے لیے رقم کی درخواست کے لیے ایس ایل برائے کالی

بیت بنیاد کے لیے رقم کی درخواست کے لیے ایس ایل برائے کالی

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P=26

اپیل برائے بحالی
بھخور جناب انسپکٹر جنرل آف پولیس، IGP، KPK، پشاور۔

درخواست برادر بحالی بر خاشگی کا نشیبل نمبر FRP/8017 ڈیرہ اسماعیل خان بابت
بیماری شدید تکلیف کمزور۔

جناب عالی!

گزارش ہے کہ سائل بطور کا نشیبل FRP/8017 ڈیرہ میں خدمات سرانجام دیتا رہا۔ سائل کو
اکثر و بیشتر کمزور کی تکلیف رہتی تھی۔ جس کی وجہ سے سائل چلنے پھرنے میں شدید تکلیف محسوس
کرتا تھا۔ جب سائل نے کمزور کی بابت مکمل چیک اپ کرایا تو ڈاکٹر نے سختی سے چلنے پھرنے
اور وزن اٹھانے سے روک دے اور سائل زیر علاج رہا۔ لیکن باوجود اس قدر شدید تکلیف کے بھی
سائل وقتاً فوقتاً حاضری دیتا رہا۔ میڈیکل رپورٹس لفب ہیں۔

یہ کہ سائل ایک فرض شناس اور ایماندار شخص ہے۔ سائل دائمی کمزور میں مبتلا رہا۔ سائل کو اسی وجہ
کے برخواست کر دیا گیا۔ سائل اپنے علاج معالجہ میں مصروف رہا۔ سائل نے عمدہ دیدہ دانستہ
حاضری میں کوئی کوتاہی یا سستی نہیں کی۔ اب سائل کی طبیعت میں کافی افادہ آچکا ہے۔ سائل کا
علاج معالجہ پر کافی خرچہ ہوا ہے۔ سائل گھر کا واحد کفیل ہے دیگر کوئی ذریعہ آمدنی نہیں ہے۔

3۔ یہ کہ سائل نے قبل ازیں ایک درخواست برائے بحالی کمانڈنٹ صاحب FRP/KPK کو
گزار لی لیکن کمانڈنٹ صاحب نے سائل کی درخواست کو مسترد کر دیا۔



4- یہ کہ سائل یقین دہانی دلاتا ہے کہ سائل آئندہ کوئی کوتاہی نہیں کریگا۔ سائل با امر مجبوری قاصر رہا۔
سائل دوبارہ بحالی کا مستحق و حقدار ہے۔

لہذا استدعا ہے کہ سائل کی تکلیف کمزور اور مجبوری پریشانی ایروڈگاری کو مد نظر رکھتے
ہوئے بحال فرمایا جاوے۔ سائل تازیت دعا گورہیگا۔ آپ کی عین نوازش ہوگی۔

خالد نعمان ولد عبد الرحمان کاشمیل 8017/FRP ڈیرہ اسماعیل خان۔

0345-642-9999

ORDER

Annexure 'A'

22-7-19
P-28

This order will dispose of the departmental appeal preferred by ex-constable Khalid Noman No. 8017 of FRP DI Khan Range, against the order of SP FRP DI Khan Range, DI Khan issued vide OB No. 338, dated 06.05.2019, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he remained absented himself from Refresher Course with effect from 09.12.2018 to 13.12.2018 and 21.12.2018 to 07.01.2019 for (21) days, and with effect from 14.01.2019 to 21.01.2019 and 28.01.2019 to 07.02.2019 total (17) days. Similarly he again absented from Refresher Course with effect from 08.02.2019 to 24.03.2019 for period of (44) days, and with effect from 08.04.2019 till the dated of his removal from service i.e 06.05.2019 for period of 28 days without any leave permission from the competent authority. (Thus his total absence period comes 110 days)

In this regard he was served with Show Cause Notice, but he failed to submit his reply. He was issued Charge Sheet alongwith Summary of Allegations and Zahoor Ud Din DSP FRP DI Khan was nominated as Enquiry Officer to conduct enquiry against him. After completion of the codal formalities the Enquiry Officer submitted his findings, wherein the defaulter official was found guilty of the charges leveled against him and therefore recommended that his absence period may be treated as leave without pay. He was called in orderly room since 28.03.2019, but he deliberately failed to appear before the competent authority.

From perusal of his service record it has been found that he was previously remained absent from duty for total period of (753) days, which he awarded minor punishment of confinement to quarter guard for 19 days, extra drill for 05 days, fine Rs. 7000/- also removed from service which later on reinstated in service and his removal order is converted into minor punishment of stoppage of 03 annual increments without cumulative effect vide order Endst; No. 9032/EC, dated 07.09.2018.

In the light of the above narrated facts and other material available on record, he was awarded major punishment of removal from service vide OB No. 338, dated 06.05.2019.

Feeling aggrieved against the impugned order of SP FRP DI Khan Range, DI Khan the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 17.07.2019.

P=29

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. 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. Besides, he cannot become a good Police Officer, his retention in service would further embolden the accused officer and impinge upon the adversely on the over all discipline and conduct of the force.

From perusal of relevant record, it has been found that the applicant was previously removed from service too, which he subsequently reinstated in service on departmental appeal.

Keeping in view the above facts, it is abundantly clear that he cannot be reformed given his aptitude for absence as evident from previous record. Thus 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, I, **Sajid Ali PSP** Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected being time barred and meritless.

Order Announced.

[Signature]
Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

No. 6206-07/EC, dated Peshawar the 19/07/2019.

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

- ✓ 1. SP FRP DI Khan Range, DI Khan. His service record alongwith D-file sent herewith.
- 2. Ex-constable Khalid Noman No. 8017 S/O Abdul Rehman, Police Station Canit, Village Dhapan Wali, Post Office Saeed Abad, District DI Khan.

[Signature]
dt 22-7-2019

OB-110 SJS
22-07-019

[Signature]
OB/SRE/OASi

For n/action

[Signature]
22-07-2019

[Signature]
22/07/19

[Signature]



Annexure I

P-30

By No. 983
Date 2-9-19

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

No. SI 3034

119, dated Peshawar the 23/08/2019

To The Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar

Office of the Addl. Commr. F.R.P. KPR Peshawar.
Diary No. 7233
Date 23-8-19

Subject: REVISION PETITION.

Memo:

The Competent Authority has examined and filed the revision petition submitted by
Ex-Constable Khalid Noman No. 3017 of FRP DIKhan against the punishment of reversion
service awarded by Superintendent of Police, FRP DIKhan vide OB No. 338, dated 16/08/19
one barred

The applicant may please be informed accordingly

Si/ Legal
to inform

[Signature]
16/8
(SYRWAJIS-UL-HASSAN)
Registrar,
For Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar

Office of Commandant FRP KP, Peshawar
No 7233 / SI copy dated Peshawar 27/08/2019

copy of notice is forwarded to the SP FRP DIK
Range DIK for information and n/action. The applicant
may be informed accordingly PV

RK PPS
by
02/09

[Signature]
SRE/OB/OASi/
For n/action

[Signature]
Commandant FRP KP, Peshawar

[Signature]
SP/FRP/
02/09/19

OB No 337
03.09.19

P=31

.....Better Copy.

Office of the
Inspector General of Police
Khyber Pakhtunkhwa
Central Police Office, Peshawar.

NO. S/3034/19 Dated Peshawar 23/08/2019.

To,

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

Memo;

The Competent Authority has examined and filed the revision petition submitted by Ex-Constable Khalid Noman No. 8017 of FRP DIKhan against the punishment of removal from service awarded by superintendent of Police, FRP DIKhan vide OB No. 338 dated 06/08/2019 and time barred.

The applicant may please be informed accordingly.

Syed Anis Ul Hassan
Registrar

For Inspector General of Police,
KPK.

Office of commandant FRP KP, Peshawar.
No. 7253 for legal Peshawar dated 27/08/2019

Copy of above is forwarded to the SP FRP DIKhan Range, DIK for information and N/action. The applicant may be informed accordingly.

SCRC/OB/OASI
For N/action.

Commandant FRP, KP, at Peshawar.
OB No. 687/
Dated 03/09/019

P-32

OFFICE OF THE SUPERINTENDENT OF POLICE FRP DIKHAN RANGE DIKHAN

SHOW CAUSE NOTICE

(Under Rule 5(3)(b) KP Police Rules 1975)

Annexure - "J"

- I) Whereas you Constable Khalid Noman No.8017/FRP of FRP, have rendered yourself liable to be proceeded under Rule 5(3) (b) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct.
 - a) according to daily diary reports vide mad No.46 dated 13.12.2018, No.42 dated 07.01.2019 of FRP HQrs: Peshawar, you remained absented yourself from Refresher Course with effect from 09.12.2018 to 13.12.2018, 21.12.2018 to 07.01.2019 total (21) day respectively, similarly according to daily diary reports vide mad No.16 dated 21.01.2019, No.27 dated 07.02.2019 of District Police Lines DIKhan, you remained absent from law full duties with effect from 14.01.2019 to 21.01.2019, 28.01.2019 to 07.02.2019 total (17) days, total absence period comes (38) days respectively without any leave or permission from the competent authority.
- II) That the misconduct on your part is prejudicial to good order of discipline in the Police Force.
- III) That by taking cognizance of the matte under enquiry the undersigned as competent authority under the said rule proposed stern action against you by awarding one or more of the punishments as provided in Rule 4 the receipt of the notice failing which an ex-part action shall be taken against you.
- IV) you are further directed to inform the undersigned as to whether you wish to be heard in person or not.

Received By [Signature]
Dated 21/2 / 2019

(AMAN ULLAH KHAN)
Superintendent of Police, FRP
DIKhan Range DIKhan

79-101-85577-304-5
مذکورہ کیس فرپ کے لئے
ساتھ خود درج کروا گیا ہے

سوال : جواب : 15 ج 14 ج 13 ج

بھیجا گیا ہے
 15 ج 14 ج 13 ج
 مختلف سوالوں پر مختلف
 میں آمل (38) رقم غیر ملکی کا التزام ہے۔ اس کے 3 ادا
 سوالوں خلاف ہوں کہ میں سوال کے لئے جو رقم کو سوالوں میں
 پر غیر ملکی ہوگی ہے۔ میں سوال کے جان کو رقم غیر ملکی
 نہیں کی ہے۔ بلکہ رقم میں کچھ ایسے سوالوں کے خلاف
 ہے یہ غیر ملکی ہوگی ہے۔ سوالوں میں غیر ملکی
 میں رقم بہت پر کٹیاں ہوں۔

سوال : میں مار صفائی دی ہے اس لئے کہ
 غیر ملکی نہیں کروں گا

الف

خالد اعجاز
25-3-18

DSP FRP
D.I. Khan

XXXX

سوال : آگے کیا ایسی صورت ہے کہ اب (38) رقم غیر ملکی کے
 جواب : جی ہاں کہہ سکتے ہیں کہ یہ صورت ہے جس سے
 مختلف صورتوں میں غیر ملکی ہوگی ہے اور

DSP FRP
D.I. Khan

سوال : کیا اب یہ صورتیں ہیں کہ ایسے صورتوں سے
 جواب : جی ہاں یہ صورتیں ہیں جو کہ یہ صورتیں
 ہیں

اردو میں لکھی گئی ہے

8017
FRP

حاصلہ کاروائی	تاریخ (31)	No
<p>اس روز انوائری کا خدشہ ہے۔ 419-20-FRP 07-3-19</p> <p>پرنٹڈ کمیشن خالہ کھان 8017 FRP</p> <p>مطالعہ انوائری سے پتا چلا کہ مذکورہ کمیشن ڈائریکشن کے پاس ہے۔</p> <p>7-2/19 اور 21-1/19 (21) اور 13-12/18 تا 17-1/19 (17) تک 38 = 17 + 21</p> <p>ڈیوٹی سے غیر حاضر ہو گیا ہے۔ خدشہ ہے کہ انوائری کے پاس کاروائی سے متعلقہ کاروائی طلب کی جا رہی ہے۔</p> <p>DSP FRP D.I.Khan</p>	<p>07-3-19</p>	<p>1</p>
<p>اس روز انوائری کے پاس اس کے بارے میں کوئی اطلاع نہیں ہے۔</p> <p>DSP FRP D.I.Khan</p>	<p>11-3-19</p>	<p>2</p>
<p>اس روز انوائری کے پاس اس کے بارے میں کوئی اطلاع نہیں ہے۔</p> <p>DSP FRP D.I.Khan</p>	<p>25-3-19</p>	<p>3</p>
<p>اس روز انوائری کے پاس اس کے بارے میں کوئی اطلاع نہیں ہے۔</p> <p>DSP FRP D.I.Khan</p>	<p>26-3-19</p>	<p>4</p>

حاصل ہو رہا ہے

DSP جنرل

جانسی ا

FRP-DIK

والدہ کی طرف سے جاری شدہ فرم نمبر 419-20-FRP کی تاریخ 07-3-19

مختلف کمیشن خالہ نعمان 8017 FRP DIK کی تفہیم انوائسری کو

یوں ہے۔ مطلقہ انوائسری سے یہاں کہہ کہ کمیشن مذکورہ مختلف

تاریخوں میں کل (38) نومبر کسی اجازت کے انوائسری

سے منسب ہو گا ہے

انڈین سٹیٹ کنسٹرکشن فوڈرہ کو طلب کیا جا رہا ہے جاری شدہ

مذکورہ تو فرم انوائسری سے جس کا فرم نمبر مذکورہ ہے فرم نمبر 25/3/18

کو ہے۔ ہمارے اس سولڈ فرم کی گئی ہے

مذکورہ کنسٹرکشن فرم (38) نومبر منسب کی کتاب ہے

گو فرم سولڈ فرم ہے

کنسٹرکشن فوڈرہ مذکورہ انوائسری انوائسری کے متعلق

کوئی معقول وجہ بیان نہیں کر سکتا ہے

نفاذ منسب منسب کو بلا توجہ کرنے کی سفارش

کی جاتی ہے۔ یہ حکم جاری ہے۔ معروف ماہرین کو

— — —

طیور الہ آباد

DSP FRP DIK

26-3-2019

Advocate's Identity Card

S/No. 36



وکالت نامہ

N.-W.F.P. BAR COUNCIL
Peshawar.
Phone: 252245

Secretary

کورٹ نمبر

Before the Honorable Services Tribunal ^{محکمہ سروسز} ^{پشاور}

Appellant مخائب

Khalid Noman نام Govt of W.P.R

دعویٰ یا جرم

Appeal تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا درخواستوں میں اپنی طرف سے واسطے پیروی وجود ہی برائے پیشگی یا تصفیہ مقدمہ مقام Saeed Ullah Mughal Advocate کیلئے

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشگی پر خود بذریعہ اختیار ماس روز بروعدالت حاضر ہونا اور ہر وقت ہاؤس کے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دینا، بیکر حاضر عدالت کروں گا، اگر پیشگی پر مقرر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی بنیاد پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسنے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پشوری کے علاوہ کسی جگہ یا پشوری کے اوقات سے پہلے یا پشور یا برورد تعطیل ہر روز کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پشوری کے علاوہ کسی جگہ یا پشوری کے اوقات سے پہلے یا پشور یا برورد تعطیل ہر روز کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر پشوری کے علاوہ اور جگہ سماعت ہونے یا برورد تعطیل یا پشوری کے اوقات کے آگے پیشگی ہونے پر مقرر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ نہ ادا کرنے یا عتقاندہ واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پروا مصلحت صاحب موصوف مصلحت کروہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو مرضی دعویٰ یا جواب دعویٰ یا درخواست اجراء کے ذمہ نظر ثانی اپیل مگرانی اور ہم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر حکم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر حکم کے بیان دینے اور اس پر غاشی یا راضی نامہ و فیصلہ بر ملک کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشگی مقدمہ مذکورہ ہیرن از پشوری صدر پشوری مقدمہ مذکورہ نظر ثانی اپیل مگرانی و ہر آمدگی مقدمہ یا منسوخی ڈگری کی طرف یا درخواست حکم استغاثی یا ترقی یا گرفتاری عمل از فیصلہ اجراء کے ذمہ بھی صاحب موصوف کو بشرط ادا کی طبعہ عین ہر روزی کا اختیار ہوگا اور تمام ساختہ پروا مصلحت صاحب موصوف کو ذمہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا مگرانی یا دیگر معاملہ مقدمہ مذکورہ کی دوسرے وکیل یا ہر سزا کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری نہیں تاریخ پیشگی سے پہلے ادا کر دوں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی ہر روزی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی حکم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

2020 Mar 20

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد _____

Handwritten signature and notes on the left side of the document.

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BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service appeal No.1491/2020

Khalid Nouman Son of Abdur Rehman (Ex-Constable No.8017/FRP DIK) r/o Basti Dhapa
Wali, Tehsil & District Dera Ismail Khan.....Appellant

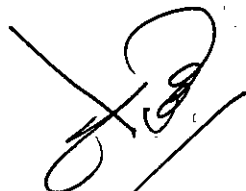
VERSUS

Inspector General of Police Khyber Pakhtunkhwa Peshawar & others.....(Respondents)

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Dated: 27/06/2022


Deponent
Mehmood Nawaz

NIC No. 11201-0369959-1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1491/2020.

Khalid Nouman Son of Abdur Rehman (Ex-constable No. 8017/FRP DIK) r/o Basti Dhapa Wali, Tehsil & District Dera Ismail KhanAppellant.

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others..... Respondents

PARAWISE REPLY BY RESPONDENTS.

RESPECTFULLY SHEWETH.

PRELIMINARY OBJECTIONS

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has no cause of action to file the instant appeal.
4. That the appellant has not come to this Honorable Tribunal with clean hands.
5. That the appellant is estopped due to his own conduct to file the instant Service Appeal.
6. That the appellant is trying to conceal the material facts from this Honorable Tribunal.

FACTS:-

1. Para No. 01 is pertain to the appellant record, needs no comments.
2. Correct to the extent that the appellant was initially appointed as constable as admitted but however, subsequently he was found an inefficient police officer.
3. Incorrect. The appellant was found a habitual absentee as pre his previous record and in this regard his service roll is full of bed entries. (Copies attached herewith as annexure "A").
4. Incorrect. The appellant previously remained absent from lawful duty for total period of (753) days, which he was awarded different punishment i.e confinement to quarter guard for 19 days, extra drill for 05 days, fine Rs. 7000/- also removed from service which later on reinstated in service on departmental appeal and his removal order is converted into minor punishment of stoppage of 03 annual increments without cumulative effect vide order Endst; No: 9032/EC, dated 07.09.2018. (Copy attached herewith as annexure "B").
5. Incorrect. The appellant remained absent from Refresher Course with effect from 09.12.2018 to 13.12.2018 and 21.12.2018 to 07.01.2019 for (21) days, and with effect from 14.01.2019 to 21.01.2019 and 28.01.2019 to 07.02.2019 total (17) days. Similarly he again absented from Refresher Course with effect from 08.02.2019 to 24.03.2019 for period of (44) days, and with effect from 08.04.2019 till the dated of his removal from service i.e 06.05.2019 for period of 28 days, (Thus his total absence period comes 110 days) without any leave or prior permission of the competent authority. The plea taken by the appellant regarding his illness is a propounded story and he supposed to have taken this plea before the enquiry officer during the course of enquiry.

6. Incorrect. The appellant failed to submit any leave application or medical certificates before the competent authority.
7. Incorrect. On the allegations of willful absence the appellant was proceeded against proper departmentally and after fulfillment of all codal formalities required as per law/rules the appellant was awarded major punishment of removal from service by the competent authority.
8. Incorrect. The allegations are false and baseless. The appellant was served with proper Show Cause Notice, but he failed to submit his reply. Later on he was issued Charge Sheet alongwith Summary of Allegations and Zahoor Ud Din DSP FRP DI Khan was nominated as Enquiry Officer to conduct enquiry against him. Moreover, the appellant was summoned and heard in person in Orderly Room held on 17.07.2019, but he failed to present any justification before the competent authority regarding his prolongs absence. (Copies of Charge Sheet & Show Cause Notice are attached herewith as annexure "C" & "D").
9. Incorrect. The appellant has no cause of action to file the instant appeal and he wrongly arrayed the respondents in unsound appeal.

GROUND:-

- a. Incorrect. The orders passed by the respondents in the case of appellant are legally justified and in accordance with law / rules as the same were passed after fulfillment of all codal formalities required as per law / rules. Moreover, the allegations of willful absence leveled against the appellant were fully established by the enquiry officer during the course of enquiry.
- b. Incorrect. On the allegations of willful absence the appellant was proceeded against proper departmentally and after fulfillment of all codal formalities required as per law/rules, the appellant was awarded major punishment of removal from service by the competent authority. Thus the impugned order passed by the competent authority against the appellant is legally justified and in accordance with law/rules.
- c. Incorrect. As the appellant was willfully remained absent from lawful duty without any prior permission or any leave from the competent authority. He was dealt with proper enquiry and after fulfillment of all codal formalities he was awarded major punishment of removal from service, as per law/rules, which commensurate with the gravity of his gross misconduct.
- d. Incorrect. The appellant was absolutely treated in accordance with law/rules within the meaning of Article 4 of the constitution by giving him sufficient and proper opportunities at every level of defense and that the entire proceedings were carried out in accordance with existing laws and rules. Thus all legal formalities have been fulfilled by the competent authority before the passing of impugned order.

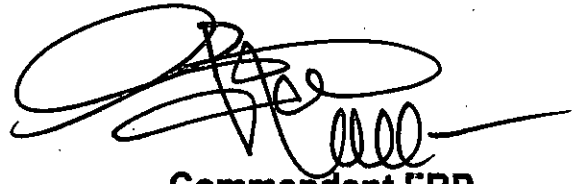
- e. incorrect. The appellant was deliberately remained absent from his lawful duty without any leave or prior permission of the competent authority to which he was proceeded against proper departmentally as per law/rules, otherwise the respondents have no grudges with the appellant or with his family.
- f. The respondents may also be permitted to raise additional grounds at the time of arguments.

PRAYERS:-

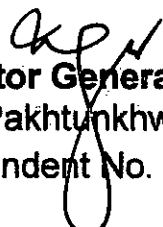
Keeping in view the above facts and circumstances, it is most humbly prayed that the instant service appeal being not maintainable may kindly be dismissed with costs please.



**Superintendent of Police FRP,
DI Khan Range, DI Khan
(Respondent No. 05)**



**Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 03 & 04)**



**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01 & 02)**

"A-1"

(B)

(14)

Serial No.

15. CENSURES AND PUNISHMENTS.

Charges: Absent from duty w.e. from 15 $\frac{7}{12}$ To 31 $\frac{8}{12}$

Total (46 days)

Punishment: confinement to 7 days Quarter Guard Absent Period is treated as leave w/o pay vide this office OB NO. 997 dt-24-10-2012

Charges: Absent from duty w.e. from 04 $\frac{02}{013}$ To 21 $\frac{02}{013}$

Total (17 days)

Punishment: confinement to Quarter Guard for (7 days) Absence Period is treated as w/o vide this office OB NO. 195/RRP dt: 01-04-013

Charges: Absent from duty w.e. from 26 $\frac{12}{014}$ To 03 $\frac{01}{015}$

Total (08 days)

Punishment: confinement to Quarter Guard for (2 days) Absence Period is treated as w/o pay vide this office OB NO. 378/RRP dt: 21-04-2015

Charges: Absent from duty w.e. from 29 $\frac{06}{2015}$ To 06 $\frac{07}{2015}$

Total (07 days)

Punishment: confinement to Quarter Guard for (3 day) Absence Period treated as leave vide this office OB NO. 777/RRP dt: 05-08-2015

Charges: Absent from duty w.e. from 24 $\frac{07}{2015}$ To 29 $\frac{09}{2015}$

Total (65 days)

Punishment: Awarded minor Punishment fine RS = 5000/- Absence Period is treated as w/o pay vide this office OB NO. 1038/RRP dt: 27-10-2015

SP/RRP
bik

Serial No.

15. CENSURES AND PUNISHMENTS - contd.

Charges: Absent from duty w.e from 25¹⁰/₀₅ To 11¹¹/₂₀₁₅

Total (23 days)

Punishment: Awarded minor Punishment Fine Rs: 2000/- Absence Period is treated as w/o pay vide this office OB NO-1128/FRP dt: 23-11-2015

SP/FRP
Dik

Charges: Absent from duty w.e from 03⁰³/₀₆ To 20⁰³/₀₆

Total (17 days)

Punishment: Awarded 10s (05 days) Extraordinary Absence Period is treated as E/leave vide this office OB NO-397/FRP dt: 15-04-2016

ORDER

Charges: Absent from duty w.e from 11⁰²/₂₀₁₇ to 30⁰⁵/₂₀₁₇, 10⁰⁷/₂₀₁₇ to 20⁰⁷/₂₀₁₇, 21⁰⁷/₂₀₁₇ to 23¹⁰/₂₀₁₇ and 16¹¹/₂₀₁₇ to till date.

Punishment: Awarded him major punishment of Removal from Service from the date of absence i.e 11⁰²/₂₀₁₇ to 30⁰⁵/₂₀₁₇, 10⁰⁷/₂₀₁₇ to 20⁰⁷/₂₀₁₇, 21⁰⁷/₂₀₁₇ to 23¹⁰/₂₀₁₇ and 16¹¹/₂₀₁₇ to till date. Absence Period is treated as without pay vide this office OB NO-215/FRP dt: 22⁰³/₂₀₁₈

- ORDER -

Re-Instated in service from the date of Removal from Service. Major punishment converted into minor punishment of stoppage of 03 annual increments without cumulative effect. He will not claim the back benefits of absence/interim period vide comdt. FRP & behaviour order dt: 03.02.18 dt: 7-9-2018 dy no 996 Com. February no. 8017/FRP

Pay fixed Rs. 14040/-
10-4-18

SP/FRP
Dik

Serial No.

15. CENSURES AND PUNISHMENTS - contd.

ORDER

on his Remstatement Service vide letter No. 9232/EC dt: 07⁰¹/₂₀₁₈ and on his arrival in FRP Police Line Dikhan vide daily diary report no. 05 dt: 11-09-2018 of FRP Police Line Dikhan is hereby allotted Constabulary no. 8017/FRP Dikhan and posted in Platoon no. 166 Distt Police Line Dikhan with immediate effect vide this office letter no. 1788-90/FRP dt: 13-09-2018

SP/FRP
Dik

ORDER

Charges: Absent from duty w-e from 09¹²/₂₀₁₈ to 13¹²/₂₀₁₈, 21¹²/₂₀₁₈ to 07⁰¹/₂₀₁₉, 14⁰¹/₂₀₁₉ to 21⁰¹/₂₀₁₉, 28⁰¹/₂₀₁₉ to 07⁰²/₂₀₁₉, 08⁰²/₂₀₁₉ to 24⁰³/₂₀₁₉ total (82) days, 08⁰⁴/₂₀₁₉ to till date.

Punishment: Awarded major punishment of Removal from Service from the date of his absence i-e 09¹²/₂₀₁₈. His absence period from 09¹²/₂₀₁₈ to 13¹²/₂₀₁₈, 21¹²/₂₀₁₈ to 07⁰¹/₂₀₁₉, 14⁰¹/₂₀₁₉ to 21⁰¹/₂₀₁₉, 28⁰¹/₂₀₁₉ to 07⁰²/₂₀₁₉, 08⁰²/₂₀₁₉ to 24⁰³/₂₀₁₉ total = (82) days 08⁰⁴/₂₀₁₉ to till date is treated as w/o pay. vide this office order no. 338/FRP dt: 05-05-2019 (order copy Attached)

ORDER

Appeal for Re-instate in Service is Dik Rejected vide Commandant FRP KPK Pesh. order no. 6206-07/EC dt: 19⁰⁷/₂₀₁₉ vide this office order no. 575/FRP dt: 22-07-2019 (order copy Attached)

SP/FRP
Dik

Serial No.

15. CENSURES AND PUNISHMENTS - conold

Teal 56
07/11/18 Drawn PS-20214/- on a/c
of pay & Allow-ef 11⁰⁹/₁₈ to
30⁰⁹/₁₈

Handwritten initials and scribbles
2011/11/18

ORDER

Appeal for Re-instate in Service is Rejected
and filed vide CGP KPK Peshawar letter No:
S/3034/19 dt: 23⁰⁸/₂₀₁₉ & vide Comrdt FRP Peshawar
KPK letter No: 7253/SI legal dt: 27⁰⁸/₂₀₁₉ vide
this office Dyno: 983/FRP dt: 02-09-2019 & Dyno: 687/FRP
dt: 03-09-2019
(order copy attached)

Handwritten signature/initials
SP/FRP

"A" (3)

(17)

LEAVE, ABSENCE AND BREAKS IN SERVICE

All periods not counting " approved service " to be entered in red ink.

1		2			3	4
DATE		EXTENT			No. of District Order	description of leave i.e privilege, hospital, sick leave, or furlough, or of absence, or forfeiture of approved service. All entries to be initialed, by Superintendent of Police.
From	To	Years	Months	Days		
19 ⁶ / ₁₀	To 5 ⁶ / ₁₀			45 days	OB-NO 609/FRP dt=21-6-10	Leave with cut pay SP/FRP
16 ⁸ / ₂₀₁₀	To 17 ⁸ / ₂₀₁₀			1 day	OB, NO, 834/FRP dt, 6-9-2010	Leave w/o pay SP/FRP
15 ⁹ / ₂₀₁₀	To 20 ⁹ / ₂₀₁₀			5 days	OB, NO, 1013/FRP dt, 24-11, 2010	Leave w/o pay D.I.K. SP/FRP
23 ¹⁰ / ₂₀₁₀	To 11 ¹² / ₂₀₁₀			48 days	OB No. 60 2-2-2011.	Medical Leave on full pay SP/FRP
16 ¹⁰ / ₁₁	To 20 ¹⁰ / ₁₁			5 days	OB, NO. 21 dt-5-1-12	Leave w/o pay SP/FRP
15 ⁷ / ₁₂	To 31 ⁸ / ₁₂			46 days	OB, NO. 977/FRP dt-24-10-12	Leave w/o pay D.I.K. SP/FRP
04 ⁰² / ₀₃	To 21 ⁰² / ₀₃			17 days	OB NO. 195/FRP dt: 01-04-03	w/o pay SP/FRP
17 ⁰³ / ₀₃	To 28 ⁰³ / ₀₃			11 days	OB NO. 327/FRP dt-11-06-03	w/o pay SP/FRP
23 ⁰⁷ / ₀₃	To 27 ⁰⁷ / ₀₃			5 days	OB NO. 541/FRP dt: 03-09-03	w/o pay SP/FRP
17 ¹⁰ / ₀₃	To 19 ¹⁰ / ₀₃			2 days	OB NO. 653/FRP dt=31-10-2013	w/o pay SP/FRP
04 ¹⁰ / ₀₃	To 06 ¹⁰ / ₀₃			2 days	OB NO. 15/FRP dt: 06-01-04	w/o pay SP/FRP
22 ¹¹ / ₀₃	To 30 ⁰³ / ₀₄			9 days	OB NO. 345/FRP dt: 14-01-04	w/o pay SP/FRP
				98 days	OB NO. 345/FRP dt: 14-01-04	w/o pay SP/FRP
02 ⁰⁷ / ₀₄	To 06 ⁰⁷ / ₀₄			30 days	OB NO. 345/FRP dt: 14-01-04	E/leave on full pay SP/FRP
01 ⁰⁹ / ₀₄	To 07 ⁰⁹ / ₀₄			4 days	OB NO. 676/FRP dt: 10-07-04	w/o pay SP/FRP
08 ⁰¹ / ₀₅	To 09 ⁰¹ / ₀₅			8 days	OB NO. 892/FRP dt=25-09-04	w/o pay SP/FRP
06 ⁰³ / ₀₅	To 08 ⁰³ / ₀₅			1 day	OB NO. 104/FRP dt=30-01-05	w/o pay SP/FRP
				2 days	OB NO. 241/FRP dt=19-03-2014	w/o pay SP/FRP
				249 days		

22 $\frac{03}{015}$ To 30 $\frac{03}{015}$ - (8) days OB NO. 336/FRP w/o Pay SP/FRP _{DIR}
 dt = 09-04-015

31 $\frac{03}{015}$ To 02 $\frac{04}{015}$ - (2) days OB NO. 354/FRP w/o Pay SP/FRP _{DIR}
 dt = 14-04-015

26 $\frac{12}{014}$ To 03 $\frac{01}{015}$ - (8) days OB NO. 378/FRP w/o Pay SP/FRP _{DIR}
 dt = 21-04-2015

30 $\frac{04}{2015}$ To 14 $\frac{05}{2015}$ - (14) days OB NO. 519/FRP w/o Pay SP/FRP _{DIR}
 dt = 24-06-2015

11 $\frac{11}{2014}$ To 27 $\frac{11}{2014}$ - (16) days OB NO. 638/FRP w/o Pay SP/FRP _{DIR}
 dt = 29-06-2015

21 $\frac{06}{2015}$ To 24 $\frac{06}{2015}$ - (3) days OB NO. 679/FRP w/o Pay SP/FRP _{DIR}
 dt = 13-07-2015

22 $\frac{07}{2015}$ To 24 $\frac{07}{2015}$ - (2) days OB NO. 811/FRP w/o Pay SP/FRP _{DIR}
 dt = 22-08-2015

24 $\frac{07}{2015}$ To 29 $\frac{09}{2015}$ - (65) days OB NO. 1038/FRP with out Pay SP/FRP _{DIR}
 dt = 27-10-2015

25 $\frac{10}{2015}$ To 17 $\frac{11}{2015}$ - (23) days OB NO. 1128/FRP with out Pay SP/FRP _{DIR}
 dt = 23-11-2015

08 $\frac{03}{2016}$ To 06 $\frac{05}{2016}$ - (60) days OB NO. 253/FRP E/Leave on full pay _{DIR}
 dt = 08-03-2016

03 $\frac{03}{016}$ To 20 $\frac{03}{016}$ - (17) days OB NO. 397/FRP E/Leave on full pay _{DIR}
 dt = 15-04-2016

Leave Reconsider/Revised (45) days
 OB NO. 489/FRP
 dt = 12-05-2016
 SP/FRP _{DIR}

03 $\frac{02}{017}$ To 06 $\frac{02}{017}$ - (3) days OB NO. 191/FRP w/o Pay SP/FRP _{DIR}
 dt = 27-2-017

25 $\frac{07}{2017}$ To 25 $\frac{08}{017}$ - (30) days OB NO. 585/FRP w/o Pay SP/FRP _{DIR}
 dt = 03-08-2017

11 $\frac{2}{2017}$ To 30 $\frac{5}{2017}$
 10 $\frac{7}{2017}$ To 20 $\frac{7}{2017}$
 11 $\frac{7}{017}$ To 23 $\frac{10}{017}$
 16 $\frac{11}{017}$ To 22 $\frac{3}{018}$
 09 $\frac{12}{2018}$ To 13 $\frac{12}{2018}$
 21 $\frac{12}{2018}$ To 07 $\frac{01}{2019}$
 14 $\frac{01}{2019}$ To 21 $\frac{01}{2019}$
 28 $\frac{01}{2019}$ To 07 $\frac{02}{2019}$
 08 $\frac{02}{2019}$ To 24 $\frac{05}{2019}$
 08 $\frac{02}{2019}$ To 06 $\frac{05}{2019}$

330 days OB NO. 315 w/o Pay SP/FRP _{DIR}
 dt = 22-3-018

(11) days OB NO. 338/FRP w/o Pay SP/FRP _{DIR}
 dt = 06-05-2019

"B" (4)

ORDER 7

This order will dispose of the departmental appeal preferred by constable Khalid Noman No. 8238/8017 of FRP DI Khan Range, wherein he was removed from service on 22.03.2018. The applicant was proceeded against on the allegations, that according to Daily Dairy report No. 22, dated 11.02.2017, of Police Station Kirri Khaisor DI Khan, he remained absent from lawful duties with effect from 11.02.2017 to 30.05.2017 for the period of 112 days and again with effect from 10.07.2017 to 20.07.2017, 21.07.2017 to 23.10.2017 total 102 days. Hence his total absence period comes 214 days, without any leave/permission of the Competent Authority.

In this regard he was served with Show Cause Notice. He was required to submit the reply within stipulated period, but he failed to do so. He was issued Charge Sheet alongwith Statement of Allegations, and Line Officer Shakir Ullah of FRP DI Khan was appointed as Enquiry Officer to conduct enquiry against him. After completion of all codal formalities the Enquiry Officer submitted his findings, wherein the applicant was found guilty of the charges leveled against him.

Upon the finding of Enquiry Officer he was issued Final Show Cause Notice on 01.08.2017, but he failed to submit his reply. He was called in Orderly Room for personal hearing on various dates but he did not appear before the competent authority.

In the light of recommendation of the enquiry officer and other material available on record, he was awarded major punishment of removal from service vide OB No. 215, dated 22.03.2018.

Feeling aggrieved against the impugned order of SP FRP DIK Range, DIK the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 28.08.2018.

During the course of personal hearing, the applicant contended that he was not remained absent from duty willfully, but due to some domestic problems. He further contended that he belongs to a poor family and a sole bread earner for his whole family and promised that he will not repeat the same practice in future.

Based on the findings narrated above, I, Tahir Ayub Khan PSP Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, taking a lenient view, he is hereby reinstated in service from the date of removal from service. The major punishment of removal from service is hereby converted into minor punishment of stoppage of 03 annual increments without cumulative effect. However, he shall not claim the back benefits of absence/intervening period.

Order Announced.

[Signature]
Commandant

Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

No. 9032 /EC, dated Peshawar the 07/09/2018.

Copy of above is forwarded for information and necessary action to the SP FRP DIK Range, DIK. His service record alongwith D File sent herewith.

Copy Missal
Received

[Signature]
10-09-18
10-09-2018

otte/ob/see/ps
for action

OB # 599
10-09-2018

[Signature]
SP/PRD/US
10/09/18

"C-5"

No. 18 / FRP

Dated 12/02 / 2019

OFFICE OF THE SUPERINTENDENT OF POLICE FRP DIKHAN RANGE DIKHAN

SHOW CAUSE NOTICE

(Under Rule 5(3)(b) KP Police Rules 1975)

- I) Whereas you Constable Khalid Noman No.8017/FRP of FRP have rendered yourself liable to be proceeded under Rule 5(3) (b) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct.
- a) according to daily diary reports vide mad No.46 dated 13.12.2018, No.42 dated 07.01.2019 of FRP HQrs: Peshawar, you remained absented yourself from Refresher Course with effect from 09.12.2018 to 13.12.2018, 21.12.2018 to 07.01.2019 total (21) day respectively, similarly according to daily diary reports vide mad No.16 dated 21.01.2019, No.27 dated 07.02.2019 of District Police Lines DIKhan, you remained absent from law full duties with effect from 14.01.2019 to 21.01.2019, 28.01.2019 to 07.02.2019 total (17) days, total absence period comes (38) days respectively without any leave or permission from the competent authority. 7
- II) That the misconduct on your part is prejudicial to good order of discipline in the Police Force.
- III) That by taking cognizance of the matte under enquiry the undersigned as competent authority under the said rule proposed stern action against you by awarding one or more of the punishments as provided in Rule 4 the receipt of the notice failing which an ex-part action shall be taken against you.
- IV) you are further directed to inform the undersigned as to whether you wish to be heard in person or not.

Received By [Signature]
Dated 21/2 / 2019

(AMAN ULLAH KHAN)
Superintendent of Police, FRP
DIKhan Range DIKhan

12101-85577301-5
مدلوله کنیل 2 فرپ 2019
ساته خورد ویرل یا به

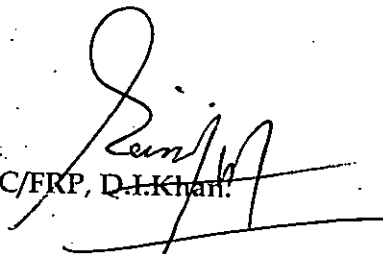
C-6

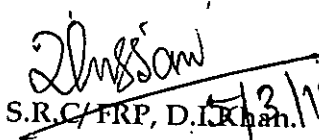
REFERENCE ATTACHED.

Constable Khalid Noman No.8017/FRP was served with Show Cause Notice on 21.02.2019 for the misconduct that according to daily diary reports vide mad No.46 dated 13.12.2018, No.42 dated 07.01.2019 of FRP HQrs: Peshawar, he remained absented himself from Refresher Course with effect from 09.12.2018 to 13.12.2018, 21.12.2018 to 07.01.2019 total (21) day respectively, similarly according to daily diary reports vide mad No.16 dated 21.01.2019, No.27 dated 07.02.2019 of District Police Lines DIKhan, he remained absent from law full duties with effect from 14.01.2019 to 21.01.2019, 28.01.2019 to 07.02.2019 total (17) days, total absence period comes (38) days respectively without any leave or permission from the competent authority.

He was required to submit his reply of said Show Cause Notice with in stipulated period of 07 days but he failed to do so.

Submitted for kind perusal and further order please.


H.C/FRP, D.I.Khan

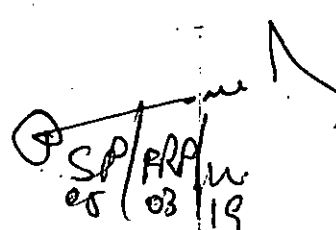

S.R.C/FRP, D.I.Khan. 5/3/19

W/SP/FRP, D.I.Khan Range.

S R c

Issue charge sheet &
statement of allagation ASP/Zahoor
Khan nominated as Enquiry Officer.

بھرتی : 02/01/2010
سابقہ غیر جانبداری : (753) ایوم
دیگر سفٹرائیش : (19) ایوم کو آڈٹنگ
(5) ایوم ونگسٹر اوڈرن
RS=7000/- جرمانہ
ایک مرتبہ مہروں سے برخاست ہو کر
دوبارہ اپیل کرنے پر بحال ہوا ہے۔


P.S.P/FRP/w
05/03/19

کتاب الہدایہ (FRP) ۲۰۱۹

C-7

No. 28 /FRP

Dated 05/03 /2019

OFFICE OF THE SUPERINTENDENT OF POLICE FRP DIKHAN RANGE DIKHAN

SHOW CAUSE NOTICE

(Under Rule 5(3)(b) KP Police Rules 1975)

I) Whereas you Constable Khalid Noman No.8017/FRP of FRP have rendered yourself liable to be proceeded under Rule 5(3) (b) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct.

a) according to daily diary report No.29 dated 08.02.2019 of FRP HQrs: Peshawar, you absented yourself from Refresher Course with effect from 08.02.2019 to till date without any leave or permission from the competent authority.

II) That the misconduct on your part is prejudicial to good order of discipline in the Police Force.

III) That by taking cognizance of the matte under enquiry the undersigned as competent authority under the said rule proposed stern action against you by awarding one or more of the punishments as provided in Rule4 the receipt of the notice failing which an ex-part action shall be taken against you.

IV) you are further directed to inform the undersigned as to whether you wish to be heard in person or not.

Received By [Signature]
Dated 15/3 /2019

[Signature]
(AMAN ULLAH KHAN)
Superintendent of Police, FRP
DIKhan Range DIKhan

0345-6929999
12101-8557739-5

فرد کوڑہ کینٹل نے شاہ عالم آباد
پورب پر فوری وصول کیا جا

3
5
[Handwritten marks]

"C"-8

No. 47/FRP

Dated 25/04/2019

OFFICE OF THE SUPERINTENDENT OF POLICE FRP DIKHAN RANGE DIKHAN
SHOW CAUSE NOTICE

(Under Rule 5(3)(b) KP Police Rules 1975)

- I) Whereas you Constable Khalid Noman No.8017/FRP of FRP have rendered yourself liable to be proceeded under Rule 5(3) (b) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct.
 - a) according to daily diary report No.27 dated 07.02.2019 of District Police Lines DIKhan, you remained absent from law full duties with effect from 28.01.2019 to 07.02.2019 total (10) days, similarly according to daily diary report No.31 dated 08.04.2019 of Police Station Saddar DIKhan, you remained absent from law full duties with effect from 08.04.2019 to till date without any leave or permission from the competent authority.
- II) That the misconduct on your part is prejudicial to good order of discipline in the Police Force.
- III) That by taking cognizance of the matte under enquiry the undersigned as competent authority under the said rule proposed stern action against you by awarding one or more of the punishments as provided in Rule4 the receipt of the notice failing which an ex-part action shall be taken against you.
- IV) you are further directed to inform the undersigned as to whether you wish to be heard in person or not.

Received By: [Signature]

Dated 26/4/2019

[Signature]
(AMAN ULLAH KHAN)
Superintendent of Police, FRP
DIKhan Range DIKhan

1810 8557739
03456429999
ذیل کیلئے ڈیپٹی سب ڈیوٹی
خود وصول کیا ہے

"C-9"

REFERENCE ATTACHED.

Constable Khalid Noman No.8017/FRP was proceeded against departmentally on the charges that according to daily diary reports vide mad No.46 dated 13.12.2018, No.42 dated 07.01.2019 of FRP HQrs: Peshawar, he remained absented himself from Refresher Course with effect from 09.12.2018 to 13.12.2018, 21.12.2018 to 07.01.2019 total (21) day respectively, similarly according to daily diary reports vide mad No.16 dated 21.01.2019, No.27 dated 07.02.2019 of District Police Lines DIKhan, he remained absent from law full duties with effect from 14.01.2019 to 21.01.2019, 28.01.2019 to 07.02.2019 total (17) days, total absence period comes (38) days respectively, similarly according to daily diary report No.29 dated 08.02.2019 of FRP HQrs: Peshawar, he absented himself from Refresher Course with effect from 08.02.2019 to 24.03.2019 total (44) days total absence period comes (82) days, similarly according to daily diary report No.31 dated 08.04.2019 of Police Station Saddar DIKhan, he remained absent from law full duties with effect from 08.04.2019 to till date without any leave or permission from the competent authority.

Zahoor Ud Din DSP/FRP DIKhan Range was nominated as enquiry officer, now the finding report of enquiry officer received vides F/A, which is submitted for kind perusal and further order please.

[Handwritten Signature]
Head
03/08/19

[Handwritten Signature]
S.R.e/FRP, D.I.Khan.

W/S.P/FRP, D.I.Khan.

Order

Remove from Service
from the date of absence.

Absence Period Treated as
without Pay.

[Handwritten Signature]
3/5/019

تقریبی : 02 01 / 2010

سابقہ غیر جانبداری : (753) یوم
دیگر سزائیں : 17 یوم کو اڑ گاڈ
05 یوم دیگر سزائیں
R=7000/- بر ماہ
دیکھ سہ سروس سے برخاست ہو کر
دوبارہ اہل کرنے میں بحال ہوا ہے

"D" 10

No. 419-20 /FRP

dated: 07-03 /2019

CHARGE SHEET

- I. I, Aman Ullah Khan, SP FRP DIKhan as competent authority, am of the opinion that you Constable Khalid Noman No.8017/FRP of FRP DIKhan Range have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.
- II. According to daily diary reports vide mad No.46 dated 13.12.2018, No.42 dated 07.01.2019 of FRP HQrs: Peshawar, you remained absented yourself from Refresher Course with effect from 09.12.2018 to 13.12.2018, 21.12.2018 to 07.01.2019 total (21) day respectively, similarly according to daily diary reports vide mad No.16 dated 21.01.2019, No.27 dated 07.02.2019 of District Police Lines DIKhan, you remained absent from law full duties with effect from 14.01.2019 to 21.01.2019, 28.01.2019 to 07.02.2019 total (17) days, **total absence period comes (38) days** respectively without any leave or permission from the competent authority.. It is a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules 1975 and has rendered yourself liable to be proceeded against departmentally.
- III. By reason of the above, you seem to be guilty as sufficient materials is placed before the undersigned; therefore it is decided to proceed against you in general police proceeding.
- IV. You are; therefore, required to submit your written reply within 07 days of the receipt of this charges sheet to the Enquiry Officer.
- V. Your written reply, if any, should reach the Enquiry Officer within specific period, failing which it shall be presumed that you have no defense to offer and in that case-ex-parte action shall follow against you.
- VI. Intimate as to whether you desire to be heard in person or not?
- VII. A statement of allegation is enclosed.

[Signature]
11-3-19

[Signature]
(Aman Ullah Khan)
Superintendent of Police, FRP
DIKhan Range DIKha

DSP. FRP. No: 009
07-3-2019

"D-11"

DISCIPLINARY ACTION

I, Aman Ullah Khan, SP FRP DIKhan as competent authority, am of the opinion that you Constable Khalid Noman No.8017/FRP of FRP DIKhan Range of FRP have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.

STATEMENT OF ALLEGATION

1. According to daily diary reports vide mad No.46 dated 13.12.2018, No.42 dated 07.01.2019 of FRP HQrs: Peshawar, you remained absented yourself from Refresher Course with effect from 09.12.2018 to 13.12.2018, 21.12.2018 to 07.01.2019 total (21) day respectively, similarly according to daily diary reports vide mad No.16 dated 21.01.2019, No.27 dated 07.02.2019 of District Police Lines DIKhan, you remained absent from law full duties with effect from 14.01.2019 to 21.01.2019, 28.01.2019 to 07.02.2019 total (17) days, **total absence period comes (38) days** respectively without any leave or permission from the competent authority. It is a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules 1975 and has rendered yourself liable to be proceeded against departmentally.
2. For the purpose of scrutinize the conduct of said Constable with reference to the above allegation, Zahoor Ud Din Khan DSP/FRP DIKhan is appointed as Enquiry Officer.
3. The Enquiry Officer shall conduct proceeding in accordance with provision of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record it is finding and make with twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official.
4. The delinquent official shall join the proceeding on the date, time and place fixed by the officer.

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011-3-19

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(Aman Ullah Khan)
Superintendent of Police, FRP
DIKhan Range DIKhan
DW 713

سوال : جواب چارج ٹیٹ

صاف پائی : 51 چارج ٹیٹ قرواں ہوں کہ میں سائل پر مختلف نارٹوں

میں کل (38) نوم عمر پھری کا التزام ہے ۔ سہ 31

قرواں خدمت ہوں کہ میں سائل نے خود کو جو سائل ہوں

پر عمر پھری ہوگی ہے ۔ میں سائل نے جان لو کہ عمر پھری

میں کی ہے ۔ بلکہ گو میں کہ اسے سائل ہے جنکی

وہ سے عمر پھری ہوگی ہے ۔ سائل ایک عمر پھری ہے

میں نے سائل پر کشتیاں ہوں

سائل کو میں نام دعائی دی 25-3-19

عمر پھری میں گرونگ

الو

خالد لنگان

25-3-19

XXXX

DSP FRP
D.I. Khan

سوال : آئی کیا ایسی صورت تھی کہ ان (38) نوم عمر پھری کے

جواب : جی میں کہ جو صورت تھی کہ میں نے

مختلف نارٹوں میں عمر پھری ہوگی ہے

DSP FRP
D.I. Khan

سوال : کہ ان بنا سٹیف میں کہ ایسے صورت ہے

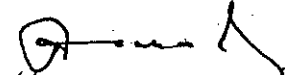
جواب : جی میں یہ وہی تھی کہ میں نے بنا دیا

No 519 /FRP

dated: 26/03/2019

CHARGE SHEET

- I. I, Aman Ullah Khan, SP FRP DIKhan as competent authority, am of the opinion that you Constable Khalid Noman No.8017/FRP of FRP DIKhan Range have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.
- II. According to daily diary report No.29 dated 08.02.2019 of FRP HQrs: Peshawar, you absented yourself from Refresher Course with effect from 08.02.2019 to till date without any leave or permission from the competent authority. It is a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules 1975 and has rendered yourself liable to be proceeded against departmentally.
- III. By reason of the above, you seem to be guilty as sufficient materials is placed before the undersigned; therefore it is decided to proceed against you in general police proceeding.
- IV. You are; therefore, required to submit your written reply within 07 days of the receipt of this charges sheet to the Enquiry Officer.
- V. Your written reply, if any, should reach the Enquiry Officer within specific period, failing which it shall be presumed that you have no defense to offer and in that case ex-parte action shall follow against you.
- VI. Intimate as to whether you desire to be heard in person or not?
- VII. A statement of allegation is enclosed.


(Aman Ullah Khan)

Superintendent of Police, FRP
DIKhan Range DIKha

 ال

کتاب الکریم (FRP)

"D-14"

DISCIPLINARY ACTION

I, Aman Ullah Khan, SP FRP DIKhan as competent authority, am of the opinion that you Constable Khalid Noman No.8017/FRP of FRP DIKhan Range of FRP have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.

STATEMENT OF ALLEGATION

1. According to daily diary report No.29 dated 08.02.2019 of FRP HQrs: Peshawar, you absented yourself from Refresher Course with effect from 08.02.2019 to, till date without any leave or permission from the competent authority. It is a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules 1975 and has rendered yourself liable to be proceeded against departmentally.
2. For the purpose of scrutinize the conduct of said Constable with reference to the above allegation, Zahoor Ud Din Khan DSP/FRP DIKhan is appointed as Enquiry Officer.
3. The Enquiry Officer shall conduct proceeding in accordance with provision of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record it is finding and make with twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official.
4. The delinquent official shall join the proceeding on the date, time and place fixed by the officer.

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(Aman Ullah Khan)
Superintendent of Police, FRP
DIKhan Range DIKhan
26/3

FRP No:
27-3-19

معاون 3 اب شہو کار نوٹس لم جلا 2 سٹ

ضابطہ 1
5 دنہ لٹو کار شہو کار نوٹس کے 3 اب معاون قذت میں

کہ فرسٹ سیرالڈرام ہے جس میں فرقہ $\frac{2}{19}$ سے لڈرام شہو کار نوٹس
شہو کار سے بہر شہو کار ضابطہ 1 ہوں

کہہ کیفیت کچھ لوں ہے کہ سائل لڈرام شہو کار نوٹس شہو کار
میں تاہم گو سے اصطلاح ملنے پر خود گو رانا ترا

سائل نے گو شہو کار صلاحت کی وجہ سے ضابطہ 1 کی ہے فرقہ
سائل کی بہت سخت جسوریا تھا - صلاحت کچھ اچھے

ہوئے پر سائل نے فرقہ $\frac{3}{19}$ 223 شہو کار اور انہی ضابطہ 1
کی ہے ان میں اسی شہو کار نوٹس 166 میں ضابطہ 1 کر رہا ہوں
اور ڈوٹی سہرا انجام دے رہا ہوں

سائل اپنے عہدہ بند ہے سائل کے حال پر لڈرام فرسٹ
سائل کی ضابطہ 1 کو صاف گناہ ہے سائل نے لڈرام کوئی
ضابطہ 1 نہیں کر رہا

Attest

2-2

سائل 1
ڈسپلینس خالد عثمان 2017
1980

DSP FBR
O.I. Khan
04-4-19

04-4-19

ٹائٹل رپورٹ

ڈیڑر فٹنر DSP

جائے جالی

FRP-DIK

FRP/DIK
کوالٹیشن کو اجازت شدہ نمبر FRP-20-419-20، 07-3-19

مختلف کمیشن خالوں کے لیے دیے گئے تفصیلات انٹرویو کے دوران

یوں ہے۔ مطالبہ انٹرویو سے یہاں کہہ دیا گیا کہ کمیشن مذکورہ مختلف

تاریخوں میں کل (38) نومبر کے لیے لازمی کے انٹرویو کے لیے

اندیشہ بہت کمیشن مذکورہ کو طلب کیا جا رہا ہے۔ اجازت شدہ
مذکورہ تفصیلات کے لیے جس کا جواب مذکورہ نمبر 25-3-19

مذکورہ کمیشن میں (38) نومبر کے لیے لازمی کے لیے
گفتگو حالات بیان کرتا ہے

کمیشن مذکورہ بہ دوران انٹرویو میں غیر فائبر کے متعلق
کوئی معقول وجہ بیان نہیں کر سکتا ہے

نفاذ میں غیر فائبر کو بلا تشریح کرنے کی سفارش
کی جاتی ہے۔ یہ حکم جہاں جہاں معروف ماہرین کو

طیروز
DSE, FRP, DIK
26-3-2019

سورس سوالات روح معانی انگریزی امیر

سوال 1: آپ کیساور سے قدر $8\frac{2}{19}$ تا $22\frac{3}{19}$ میں (42) رقم
عزیز صاحب ہوں ہوں ہوں

DSP FRP
D.I.Khan

13- جی میں گویا جو مسئلہ تھا حکم سے تھے حضور عزیز صاحب
ہونا تھا، الف
2019-4-4

سوال 2: اگر آپ کا گویا جو مسئلہ تھا تو آپ امیر ان تالی کو
بھی کیسے پیش کیوں نہ ہوتے ہوں

DSP FRP
D.I.Khan

13- جی میں کیساور میں تو مجھے اچانک گویا آنا ہوا
پر لٹا تھا - حکم سے میں بھی کیسے پیش
ہو سکا، الف
2019-4-4

سوال 3: کیا ایسی کئی تھی - ما حالات تھے کہ آپ (42) رقم مسلسل
عزیز صاحب ہوں ہوں

DSP FRP
D.I.Khan

13- جی میں حضور اور
ما حالات تھے کہ آپ

سوال 4: وہی آپ نے انگریزی سورس حکم کیا ہوں

DSP FRP
D.I.Khan

13- جی حکم کر کے ما قاعدہ فکر پس کر کے وائس آنا ہوں
الف
2019-4-4

از دفتر DSP جا عالی

FRP Dik

والد شہزادہ طارق شاہ 519-PRP طارق شاہ ایس ایس ٹی
26-3-19

التیاری Dik بر خلاف کنسٹبل خالد اعجاز
Dik 8017 PRP کے انوائس وصول ہو چکی ہے۔ طالبہ انوائس سے یہ ثابت کیا کہ
کنسٹبل مذکورہ انوائس کورس سے فرس $\frac{2}{19}$ تا $\frac{3}{19}$ 22 تک
کل (42) روز غیر حاضر ہو چکا ہے

انڈس سلسلہ میں کنسٹبل مذکورہ کو طلب کیا جا رہا ہے
واریٹ ٹیسٹ تقسیم کی گئی ہے جس کا مذکورہ نے اپنا ٹیسٹ
دیا ہے۔ وہ ساتھ ساتھ اس پر کورس فرس کی گئی ہے
کنسٹبل مذکورہ نے اپنی غیر حاضری کی بات اپنے گویوں
حالات کی وجہ سے غیر حاضری بیان کرتا ہے

کنسٹبل مذکورہ اپنی (42) یوم کی بات بیان کرتا ہے کہ
میں فرس $\frac{2}{19}$ کو سٹارڈ انوائس کورس سے غیر حاضر ہوا ہے
وہ بعد از پبلش فرس $\frac{2}{19}$ تا $\frac{3}{19}$ 22 کو سٹارڈ سے روانہ کیا گیا جو کہ
صرف 24 فرس $\frac{3}{19}$ کو لائن PRP میں طغری کر چکا ہے۔

مذکورہ نے اپنی غیر حاضری کی بات گویوں معقول و
بیان نہیں کر سکتا ہے

بعداً مذکورہ کی سرحد غیر حاضری کو بلا سزا کرنے
کی سفارش کی جاتی ہے۔ تاہم اس پر 55 افسرین مقرر ہوئے

"F" 19

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service appeal No.1491/2020

Khalid Noman Son of **AbdurRehman** (Ex: Constable No.8017/FRP) r/o Basti Dhapanwali Tehsil & District DI Khan.....Appellant


VERSUS

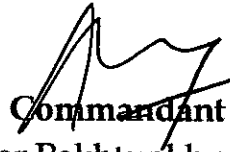
Inspector General of Police Khyber Pakhtunkhwa Peshawar & others.....(Respondents)

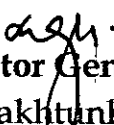
AUTHORITY LETTER

Respectfully Sheweth:-

We respondents No.01 to 05 do hereby solemnly authorize Mr. Mahmood Nawaz DSP FRP DI Khan Range to attend the Honorable Tribunal and submit affidavit/Para-wise comments required for the defense of above Service Appeal on our behalf.


Superintendent of Police FRP,
DI Khan Range, DI Khan.
(Respondent No.05)


Commandant FRP,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No.03 & 04)


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No.01 & 02)

"G" - 20

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service appeal No.1491/2020

Khalid Noman Son of AbdurRehman (Ex: Constable No.8017/FRP) r/o Basti Dhapanwali
Tehsil & District DI Khan.....Appellant

VERSUS

Inspector General of Police Khyber Pakhtunkhwa Peshawar & others.....(Respondents)

AFFIDAVIT

We respondents No.01 to 05 hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments is correct to the best of our knowledge and belief that nothing has been concealed from this Honorable Court.

21/01/22
Oath Commissioner
A/c & RO
ATTESTED
Dera Ismail Khan

Deponent

Mehmood Nawaz

NIC No. 11201-0369959-1