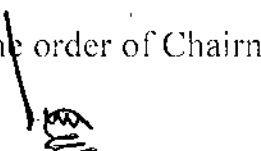


# FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ **102/2023**

S No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	10/1/2023	<p>The appeal of Mr. Zubair ur Rehman presented today by Mr. Hassan U.K. Afridi Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ . Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR,</p>

Before the Khyber Pakhtoon Khawa Service Tribunal, Peshawar

Service Appeal – No 102/2023

Zubair-Ur-Rehman

vs

IGP etc

Index

Sr No	Documents	Pages
1	Service Appeal	1-2
2	Affidavit	3
3	Addresses of the Parties	4
4	Service Card	5
5	Charge Sheet	6
6	Statement of allegation	7
7	Reply of Charge Sheet	8
8	Impugned Order 01-11-2022	9
9	Department Appeal 16-11-2022	10-15
10	Impugned Order dated 13-12-2022	16
11	Wakalat Nama	17

  
Hassan\_U.K\_Afridi

Advocate of Supreme Court

Peshawar High Court

Date: 09-01-2023

①

**Before the Khyber Pakhtoon Khawa Service Tribunal, Peshawar**

Service Appeal No 102/2023

Zubair-ur-Rehman S/o Habib-ur-Rehman (constable 4947 of FRP Kohat Range) R/o  
Shah poor, Kohat \_\_\_\_\_ **(Appellant)**

**VS**

- 1) Inspector General of Police (IGP), Khyber Pakhtoon Khawa, Peshawar.
- 2) Commandant Reserve Police, Khyber Pakhtoon khawa, Peshawar.
- 3) Superintendent of Police, FRP, Kohat Range Kohat.

**(Respondent)**

Appeal U/S 4 of the Khyber Pakhtoon Khawa Service Tribunal Act 1974, against the impugned order 01-11-2022 passed by the Respondent No 3, whereby the appeal filed by the appellant before Respondent No2, on 16-11-2022 dismissed on 13-12-2022, while both the impugned order as mentioned above are against law and are liable to be set-aside.

**Prayer In Appeal:-**

On Acceptance of this service appeal, the impugned order Passed by Respondent No.3, vide dated 01-11-2022 and impugned order passed by the respondent No 2, vide dated 13-12-2022, may kindly be set-aside and the appellant may Please be reinstated in service with all back benefits.

**Respectfully Shewith:-**

- 1) That the appellant was appointed as constable in the Police department in District Kohat on 02-06-2006.
- 2) That from the date by appointment the appellant performed his duties well and to the entire satisfaction of the superior.
- 3) That at sudden, the charge sheet and statement of allegation have been served to the appellant on 11-10-2021 as the appellant absented from duty on 12<sup>th</sup> Rabi-ul-Awal and further that the appellant quarreled with Moharrar and aimed his loaded Pistol at him.
- 4) That the appellant denied the said allegation and after conducting inquiry, the respondent no 2, awarded major Penalty to the appellant of compulsory sentiment from service with immediate effect, vide dated 01-11-2022.
- 5) That the appellant filed appeal before the respondent no 2, which has also been rejected vide dated 13-12-2022, hence this service appeal, on the following amongst the other grounds.

**Grounds:-**

- A) That the impugned order passed by the Respondent no 3, vide dated 01-11-2022 and impugned order passed by the respondent no 2, vide dated 13-12-2022, are against law and justice and are liable to be set-aside.
- B) That the appellant has not been dealt in accordance with law and rules.
- C) That the disciplinary Proceedings initiated against the appellant, is not accordance to law and rules as laid down in service laws.
- D) That the inquiry has not been conducted in accordance with law and the allegations leveled against the appellant have not been proved.
- E) That no appointunity of defense has been given to the appellant which is highly objectionable.
- F) That the inquiry Proceedings has been conducted in absence of appellant, and inquiry report has not been handed over to the appellant.
- G) That the allegations in the charge sheet have not been proved, in accordance with law.
- H) That no showcase notice has been issued to the appellant before awarding the major penalty.
- I) That the appellant is innocent and malafidely charged in the baseless allegations.
- J) That some other grounds may be adduced at the time of arguments.

It is therefore humbly prayed that on acceptance of this service appeal, the impugned order Passed by Respondent No.3, vide dated 01-11-2022 and impugned order passed by the respondent No 2, vide dated 13-12-2022, may kindly be set-aside and the appellant may Please be reinstated in service with all back benefits.

Any other relief the humbly court may deem fit of the safe administration of justice.

  
Appellant

Through,

  
Hassan Ull Afridi

Advocate of Supreme Court

Of Pakistan

Before the Khyber Pakhtoon Khawa Service Tribunal, Peshawar

Service Appeal – No \_\_\_\_\_ 2023

Zubair-Ur-Rehman

vs

IGP etc

**Affidavit**

I, Zubair-ur-Rehman S/o Habib-ur-Rehman (constable 4947 of FRP Kohat Range)R/o Shah poor, Kohat ,do hereby affirm and declare on oath that the contents of the accompanying Service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court .

*[Signature]*  
Deponent

Identified by

*[Signature]*

Hassan\_U.K\_Afridi  
Advocate of Supreme Court  
Peshawar High Court



Before the Khyber Pakhtoon Khawa Service Tribunal, Peshawar

4

Service Appeal No \_\_\_\_/2023

Zubair-Ur-Rehman

vs

Govt of KPK

Addresses of The Parties

**Petitioner: \_**

Zubair-ur-Rehman S/o Habib-ur-Rehman (constable 4947 of FRP  
Kohat Range)R/o Shah poor, Kohat

Respondents :-

- 1) Inspector General of Police (IGP), Khyber Pakhtoon Khawa, m Peshawar.
- 2) Commandant Reserve Police, Khyber Pakhtoon khawa, Peshawar.
- 3) Superintend of Police, FRP, Kohat Range Kohat.

  
Hassan\_U.K\_Afridi

Advocate of Supreme Court

Peshawar High Court

Date:

KHYBER PAKHTUNKHWA POLICE

S. No: K10873



Name: ZUBAIR-UR-REHMAN

Designation: CONSTABLE

District: KOHAT

Issuing Authority  
GPO KOHAT

*Zubair*  
Card Holder

18

Handwritten scribble or signature.

5

Handwritten signature or scribble.

(Annex A)

No. 490 /PA/FRP

PA/245/101/2021/22

Dated 11/10/2021

(6)

CHARGE SHEET

1. I, Anwar Ullah Khan, SP FRP Kohat as competent authority am of the opinion that you Constable Z. Sar Ruman No. 4947, FRP have committed the following delinquencies as defined in Rule 2 (i) of Punjab Rules 1975

(a) That as reported by Munshir FRP District Lines Kohat vide OD No. 07 dated 03.10.2022 you were detailed for special duty in D. Khan for the duration of 12" Rabi-ul-Awal but you absented yourself from said duty.

(b) That as reported vide OD No. 08 dated 03.10.2022 Roznamcha District Lines Kohat you had absented from special duty come to Roznamcha for the duration of 12" Rabi-ul-Awal and absented your loaded pistol on 03.10.2022. You also showed unprofessional attitude towards your superior officers as defined in Rule 2 (i) of Punjab Rules 1975.

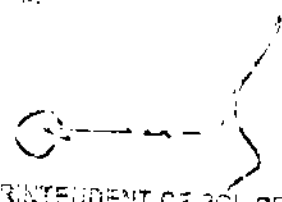
2. I am satisfied that you are guilty as a delinquent in the above specified delinquencies and you are liable to be punished accordingly.

3. I am satisfied that you are liable to be punished with the following punishment:-

(a) For the delinquency (a) and (b) you are liable to be punished with the following punishment:-  
You are liable to be punished with the following punishment:-  
I am satisfied that you have no defense to offer and in case, which to act in your favor against you.

V. Intimate us to whether you desire to be heard in person or not?

VI. A statement of allegation is enclosed

  
SUPERINTENDENT OF POLICE, SRP  
KOHAT RANGE, KOHAT



(Annex B)

PA/CH Sheet-2021-22

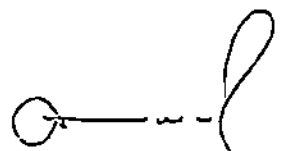
7

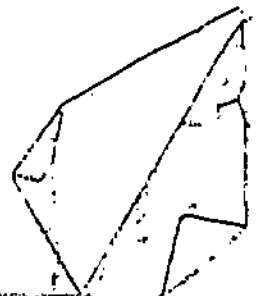
DISCIPLINARY ACTION

I, Aman Ullah Khan, SP FRP Kohat as competent authority, am of the opinion that you Constable Zubair Rehman No. 4947/FRP. have committed the following acts/omission as defined in Rule 2 (i.) of Police Rules 1975.

STATEMENT OF ALLEGATION

- a). That as reported by Muharrar FRP District Lines Kohat vide DD No. 07 dated 08.10.2022, you were detailed for special duty in D.I Khan for the occasion of 12<sup>th</sup> Rabi Ul Awal but you absented yourself from said duty.
- (b). That as reported vide DD No. 09 dated 08.10.2022 Roznamcha District Lines Kohat, you after absence from special duty came to Roznamcha for arrival report and quarreled with Muharrar and aimed your loaded pistol on him. Your this act shows very undisciplined and unprofessional attitude. Thus you have committed a gross "Misconduct" as defined in Rule 2 (i.) of Police Rules 1975.
2. For the purpose of scrutinize the conduct of said Constable with reference to the above allegations, SI Asif Hayat, E.O FRP Kohat is appointed as enquiry officer.
3. The inquiry 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

  
SUPERINTENDENT OF POLICE, FRP  
KOHAT RANGE, KOHAT



Annex (۱۰)  
بکثور بناب میں پی سب نیٹ آرڈر کوکس اور کورٹ



عنوان: جواب چارج شیٹ

جناب عالی!

مخولہ چارج شیٹ نمبری PA/FRP 402 مورخہ 10-10-2022 اور اس میں حسب ذیل فرامی فرم ہے۔

۱۔ یہ کہ سائل نے دست ڈیوٹی کرتے ہوئے کسی بھی طرح سے یہ ثابت نہیں کیا ہے کہ وہ کسی ذیل کے متعلق کوئی سارا موصوفہ نہ ہو۔

۲۔ یہ کہ بعد ازاں رپورٹ نمبر 7 مورخہ 10-10-2022 میں اس کے بارے میں کوئی رپورٹ کوئی فرامی فرم ہے۔  
۳۔ یہ کہ کوئی رپورٹ درج کرنے سے پہلے اس کے بارے میں کوئی رپورٹ کوئی فرامی فرم ہے۔  
۴۔ یہ کہ طرف درج رپورٹ کوئی فرامی فرم ہے۔  
۵۔ یہ کہ طرف درج رپورٹ کوئی فرامی فرم ہے۔

بہذا استدعا ہے کہ میرے خلاف جو فرامی فرم چارج شیٹ پر مزید کارروائی اور فرامی فرم کے بارے میں فرامی فرم فرمایا جائے۔

مورخہ 10-10-2022

*Talib*

آپ کا بندہ

کاٹھیک ڈیپوٹن نمبر 4017، 12 فروری 2022

مشینڈ اسٹریٹ، نئی دہلی

**ORDER**

(9)

My this order is issued in Kohat Range, Kohat, under duty conducted against accused suspended Constable Zahir ul Rehman No. 487 of Kohat Range, Kohat, Punjab Police Ordinance Rules 187/5 (Amended in 2014).

Being suspended from duty since 11.10.2022, he is not available for duty, hence in Roznamah FRP Constable Kohat No. 14, dated 11.10.2022, it is mentioned that he is not available for duty. A proper departmental enquiry was conducted against him and report dated 11.10.2022, vide E.O. FRP Kohat No. 464 dated 11.10.2022, is submitted to the authority. After completion of the enquiry, the enquiry officer submitted the following facts:-

His service record is not clean and he is not available for duty as per record as per 02.06.2008. He got 16 bad entries. He is not available for duty for 85 days, where the 21 days of absence period have been treated as leave. He has gone through various departmental enquiries for indiscipline & irregularities which are recorded from his service record.

He was involved in Case FR No. 254 dated 25.03.2010, SPS 13AC PS City Kohat, for which he was suspended vide DPO Kohat OB No. 119 dated 06.04.2010.

He has also been removed from service by the DPO Kohat vide OB No. 464 dated 04.04.2014 for being involved indulged with bad character woman using alcohol and made sexual fring drink while on duty. For which he was also suspended vide DPO Kohat OB No. 283 dated 01.04.2013.

He was indulged in illegal activities during vehicle checking/misbehavior with passengers particularly with ladies were not polite. He was awarded punishment of forfeiture of two years approved service by the DPO Kohat vide OB No. 1285 dated 22.11.2016.

Moreover, after reviewing the criminal service record and finding report of enquiry officer it is bright fact that he is not suitable for the service and is not fit for duty and the officer is not recommending his trend.

Therefore, in the light of finding report submitted by enquiry officer and his irregular service record, I, Aman Ullah Khan, SP, FRP Kohat Range, Kohat, in exercise of powers vested in me under Rule 5(5) of Khyber Pakhtunkhwa Police Rules-1876 (Amended in 2014), award him the proper punishment of "compulsory retirement" from service with immediate effect.

OB No. 713

Dated 01-11-2022

\_\_\_\_\_  
Superintendent of Police, FRP,  
Kohat Range, Kohat.

**OFFICE OF THE SUPERINTENDENT OF POLICE, FRP, KOHAT RANGE, KOHAT**

NO 538-39 DATED KOHAT THE 01-11-2022

- Copy to
- 1. The Commandant, FRP, Kohat Range, Kohat for information & copy
- 2. Pay Office, Kohat
- 3. Reader, Kohat
- 4. CPO, Kohat Range, Kohat
- 5. SRC, Kohat

\_\_\_\_\_  
Superintendent of Police, FRP,  
Kohat Range, Kohat

10

THE COMMANDANT FRONTIER RESERVE POLICE KHYBER  
PAKHTUNKHWA PESHAWAR

APPEAL UNDER RULE 11 OF THE POLICE RUE 1975  
(AMENDED 2014) AGAINST ORDER OF THE  
WORTHY SUPERINTENDENT OF POLICE FRP  
KOHAT RANGE KOHAT DATED 01-11-2022 VIDE  
WHICH THE APPELLANT HAS AWARDED MAJOR  
PUNISHMENT OF COMPULSORY RETIREMENT  
FROM SERVICE WITH IMMEDIATE EFFECT  
WITHOUT ANY LAWFUL JUSTIFICATION.

Respected Sir,

With great respect and veneration, the appellant may kindly be allowed to submit the following for your kind & sympathetic consideration.

FACTS OF THE CASE:

1. That the appellant is a bonafide resident of Kohat and joined the Police Department as constable in the year 2006 at the Kohat strength.
2. That the appellant after qualifying the basic recruit course started his official functions / performance with great enthusiasm, courage and vigor.
3. That the appellant during his service, always preferred to discharge his official functions strictly in accordance with law, rules and merits.
4. That due to the above qualities coupled with his straight forwardness, the honourable officers always posed confidence in the appellant and used to assign him (the appellant) sensitive assignments which he did / fulfilled successfully.

11

5. That in the FRP too the appellant continued his meritorious services and earned confidence of his worthy senior officers.
6. That while performing his duty, unfortunately under the sheer misunderstanding charge sheet and statement of allegations were served upon the appellant.
7. That the worthy competent authority of the FRP Kohat Range Kohat alleged that vide DD No. 07 dated 08-10-2022 the appellant was detailed for special duty in DI Khan for the occasion of 12<sup>th</sup> Rabi-ul-Awal but the appellant absented himself from the duty and secondly vide DD No. 09 dated 08-10-2022, after absence from special duty, the appellant came to Roznamcha for entering his arrival report and quarreled with Muharrir and aimed his loaded pistol at him. (copies of the charge sheet and statement of allegations are enclosed as annexure "A & B")
8. That the appellant accordingly replied the charge sheet on 18-10-2022 wherein he denied receipt of information regarding special duty and quarreling and aiming loaded pistol at Muharrir. (copy of reply is enclosed as annexure "C")
9. That thereafter, the appellant was awarded Major Punishment of compulsory retirement from service dated 01-11-2022. (copy of the order enclosed as annexure "D")
10. That the impugned order does not fulfill the legal requirements of law, justice and fair play therefore, it is open to be called in question.
11. That aggrieved from the order, the appellant very respectfully submits grounds of appeal which may kindly be considered in the great interest of law and justice.

#### GROUNDS OF APPEAL.

- A) That the impugned order of compulsory retirement from service is not in accordance with law, facts and evidence on record.
- B) That as far as absence from special duty for the occasion of 12<sup>th</sup> Rabi-ul-Awal at DI Khan is concerned, the appellant very respectfully submits that in fact Muharrir FRP Kohat Region Kohat had failed to inform the appellant in time either directly or on phone or through incharge officer of the appellant about the said special duty.
- C) That failure in informing the appellant undoubtedly amounts to negligence and misconduct on the part of Muharrir FRP Kohat Region Kohat, however, in order to cover up his own

negligence and to present himself as law abiding official before senior officers, Muharrir FRP Kohat Division Kohat malafidely marked the appellant as absent from duty vide Daily Dairy No. 07 dated 08-10-2022.

- D) That the actual facts reveal that the Muharrir FRP very technically twisted them against the appellant which ultimately resulted in major punishment of compulsory retirement to the appellant from service.
- E) That on 08-10-2022 when the appellant came to know about his unjustified absence from duty he went to the Roznamcha office for reporting his arrival in the Daily Dairy. When the appellant told the Muharrir that his absence from special duty was unjustified and requested him to enter his arrival in the Daily Dairy, he flatly refused to do so and the Muharrir FRP Kohat Region Kohat went a step forward by abusing and insulting the appellant.
- F) That when the appellant insisted for reporting his arrival, because the appellant was having no fault at his part, the Muharrir FRP Kohat Region Kohat introduced another false version. He planted an unlicenced pistol against the appellant and vide DD No. 09 dated 08-10-2022 had falsely claimed that the appellant had aimed his loaded pistol at the muharrir.
- G) That the allegation of aiming loaded pistol at Muharrir by the appellant is absolutely false and without any foundation because had the appellant been in possession of any unlicenced weapon, then Muharrir being already opposed to the appellant could easily register case U/S 15AA and another case U/S 506 PPC there and then but non registration of cases against the appellant reflect that neither the appellant was in possession of pistol nor the appellant aimed loaded pistol at the Muharrir FRP Kohat Region Kohat.
- H) That falsehood of the allegation can be gauged from fact that:
  - i. Nobody has been cited as witness of the alleged possession of pistol and allegedly aiming the same at the Muharrir FRP.
  - ii. It is very easy for police to identify weapon but in this case Muharrir has been failed to point bore of the pistol and make of the pistol. Furthermore, he has not mentioned that whether pistol was with or without number.

- 13
- I) That though charge sheet was served upon the appellant and in reply the appellant denied the allegation of conveying information to the appellant and also denied the charge of quarrel or aiming pistol at Muharrir FRP but unfortunately statement of the appellant was not considered by the worthy authority nor in rebuttal any thing has been mentioned in the impugned order. (copy of reply to the charge sheet is enclosed)
  - J) That the enquiry was conducted at the back of the appellant because neither he was associated with the enquiry proceedings nor the appellant was provided any opportunity to cross examine witnesses.
  - K) That the alleged pistol was also not produced during the enquiry proceedings.
  - L) That the pistol alleged to be in possession of the appellant and aiming at the person of Muharrir is planted and false and concocted one.
  - M) That being member of the law enforcing agency having more or less sixteen years service in the police department, the appellant cannot imagine to insult his seniors. Whatever adverse has been alleged that is absolutely false, unfounded, concocted and fabricated story.
  - N) That considerable portion of the impugned order consists of the past alleged omissions and commission of the appellant. Mentioning such instances in the impugned order is unnecessary because it requires that the impugned order shall confine itself with the charge sheet, enquiry and proof / disproof of the charges. The competent authority unfortunately instead of throwing light on facts of the enquiry, unjustifiably concentrated on the part incidents pertaining to the appellant.
  - O) That though the past incidents mentioned by the competent authority in the impugned order was unnecessary because punishment cannot be based on the past incidents, however, in order to make the record straight it is pertinent to mention that as far as involvement of the appellant in an offence U/S 13A O P.S City Kohat, the appellant was acquitted by the court. (copy of the decision of the court is annexed)

As far as the appellant's removal from service by the worthy DPO Kohat vide OB No. 464 dated 04-04-2014 is concerned, the order was challenged by the appellant through an appeal which was accepted by the police high up and the impugned

order passed by the DPO Kohat was set aside and the appellant was reinstated in service.

Regarding the forfeiture of two years approved service of the appellant, suffice it to say that same is minor punishment and it has no adverse or negative impact on the services of the appellant.

Thus in view of the above facts mentioning the past punishment which subsequently set aside is of no use and such practice cannot strengthen the case against the appellant.

P) That by conducting enquiry against the appellant, pre-requisites of law, justice and fair play have not been fulfilled. It is pertinent to mention here that the Constitution of Pakistan 1973~~73~~ Article 10-A, has envisaged that fair, independent and transparent enquiry / trial shall be carried out against a defaulter. The said article of the Constitution has given fundamental right to the accused / defaulter that proceedings against him will be conducted strictly on merits but in the present case by conducting one side and unilateral enquiry, the concerned have violated fundamental right of the appellant. Hence the enquiry and the impugned order of compulsory retirement of the appellant from service has lost its validity and legal force. In light of these facts, the impugned order deserves to be set aside and the appellant be reinstated in service.

Q) That the entire enquiry coupled with the impugned order are one sided, unilateral, harsh and does not commensurate with the charge leveled against the appellant.

R) That at the conclusion of the enquiry, neither enquiry report nor copy of the final show cause notice were served upon the appellant. Delivery / service of such documents upon the appellant prior to imposition of punishment was pre-requisite because the appellant has been deprived of his important defence before the worthy competent authority. Such omission on the part of the worthy competent authority has caused great miscarriage of justice and prejudice to the appellant. Thus the punishment has become legally defective and thus the same is not sustainable under the circumstances elaborated above.

S) That the appellant has got 16 years of police service to his credit which fact was not taken into consideration and with the single stroke of pen, the appellant has been deprived from bread and butter, which is not justified under the law, rules and principles of justice / fair play.

14



15

- T) That the appellant has a large family. His children have no other source of income. If the punishment remains intact, it is likely that for no sin on their part or the appellant, they will land in starvation and financial crisis and in this way Allah forbid, the appellant may sustain irreparable loss.
- U) That the impugned order is inconsistent, ambiguous, uncertain, contradictory and not in accordance with law, facts and evidence on record, hence it is liable to be set aside.
- V) That if deemed proper, the appellant may be heard in person.

Prayer:

In view of the above facts and submission, the impugned order being inconsistent, contradictory, unilateral, one sided, fanciful, arbitrary in nature and not in accordance with law, facts and evidence on record, may kindly be set aside in the great interest of law and justice. The appellant may kindly be re-instated in service from the date of the punishment order with all back benefits. The appellant and his family will pray for your long life and prosperity for this act of kindness.

Yours Obediently,

Zubair  
Ex. Contable 16.11.2022  
Zubair-ur-Rehman  
No. 4947/ FRP Kohat  
R/o Shahpur Kohat  
Cell: 0334-9524121

constable Zubair Ur Rehman No. 4947 of FRP Kohat Range, against the order of SP FRP Kohat Range, Kohat, issued vide OB No. 713, dated 01.11.2022, wherein he was awarded major punishment of compulsory retirement from service. The applicant was proceeded against on the allegations that he absented from special duty and subsequently came to Roznamcha office of FRP at District Line Kohat and quarreled with Muharrar and aimed his loaded unlicensed pistol at him.

16

In this regard, a departmental enquiry was conducted against him as he was issued Charge Sheet vide No. 490/PA, dated 11.10.2022 and Enquiry Officer was nominated to conduct proper enquiry against him. After completion of enquiry, the Enquiry Officer submitted his finding report, wherein he found him guilty of the charges leveled against him and recommended for major punishment.

His service record was perused, which revealed that he was enrolled as constable on 02.06.2006. His was previously remained absent from duty on different occasion for long period of 85 days to which he was awarded different punishments. Besides, the delinquent constable has been proceeded against various departmental enquiries for his indiscipline & illegal activities as evident from his service record. In this regard there are 13 bad entries with no good entries in his credit.

- i. He was involved in case FIR No. 254, dated 25.03.2010 U/S 13AO PS City Kohat. For which he was suspended vide DPO Kohat OB No. 119, dated 08.04.2010.
- ii. He has also removed from service by the DPO Kohat vide his OB No. 464, dated 04.04.2014 for being involved indulged with bad character woman using alcohol and made aerial firing drunk while on duty. For which he was also suspended vide DPO Kohat OB No. 288, dated 01.04.2013.
- iii. He was indulged in illegal activities during vehicle checking misbehavior with passengers particularly with ladies were not polite. He was awarded punishment of forfeiture of two years approved service by the DPO Kohat vide OB No. 1269, dated 22.11.2018.



Keeping in view the above narrated facts and other material available on record, he was awarded major punishment of compulsory retired from service vide OB No. 713, dated 01.11.2022.

Feeling aggrieved against the impugned order of SP FRP Kohat Range, Kohat, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 09.12.2022.

During the course of personal hearing, the applicant failed to present any justification regarding to his innocence. Perusal of enquiry file reveals that the allegations were fully established against him during the course of enquiry. Thus the applicant has been found an irresponsible and indiscipline person in utter disregard the discipline of the force. 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, Commandant FRP, Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

Order Announced.

OHE/SRC  
File inactive

Superintendent of Police  
FRP Kohat Range,  
Kohat  
19/12/22

Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar.

No/0235-36/Sl Legal, dated Peshawar the 13/12/2022.

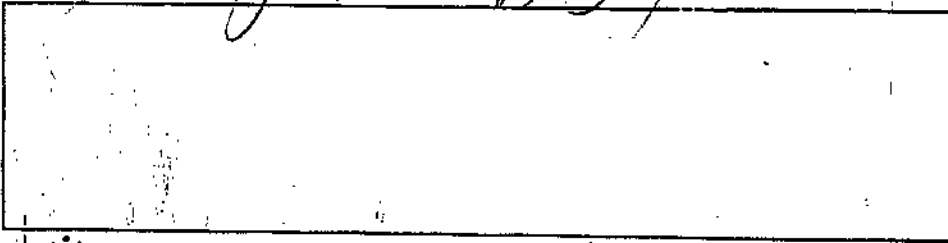
Copy of above is forwarded for information and necessary action to

the:-

1. SP FRP Kohat Range, Kohat. His service record alongwith D file sent herewith.
2. Ex-constable Zubair Ur Rehman No. 4947 FRP Kohat Range, S/o Habib Ur Rehman R/o Village Mir Bash Khel, Police Station Saddar, District Kohat.

بعد التخصیر طبعی طور پر اس کی فرم مندرجہ ذیل (مشاور)

کورٹ فیس



Wells

سے منجانب

نام انی جی ڈی

زیر اہم

مقدمہ  
مقدمہ  
دعویٰ  
نہم

### باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جوابدہی کل کاروائی متعلقہ آں مقام کے لیے لکھی۔ یوں کہ۔ اگر فرم کے رٹرن کے ساتھ ایک رسٹورٹ کی فرم مقرر کر کے اقرار کیا جاتا ہے کہ، صاحب موصوف کو مقدمہ کی کل کاروائی کا اختیار ہوگا۔ نیز وکیل صاحب کو کرنے پر رضی نامہ و تقرر ثالث و فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجرا اور وصولی چیک در روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرا اس پر منظور کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرفہ یا اپیل کی برآمدگی اور منسوخی و نیز دائر کرنے اپیل نگرانی، نظر ثانی، پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزو کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ پر ذرا متصور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا اس کے مستحق کیا صاحب موصوف ہوں گے نیز بقایا خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقدمہ دورہ پر ہو یا حد سے باہر ہو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند رہے۔

المترجم

Accepted

کے لیے منظور ہے

مقام

Wells