

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 475/2015

Date of Institution ... 08.05.2015

Date of Decision ... 01.01.2018

Muhammad Ibrar Ex-Sub Inspector R/O P.O Nahaqi Daudzai District Peshawar.
... (Appellant)

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Chief Secretary Khyber
Pakhtunkhwa Civil Secretariat Peshawar and 2 others.
... (Respondents)

MR. YASIR SALEEM,
Advocate

--- For appellant.

MR. USMAN GHANI,
District Attorney

--- For respondents.

MR. AHMAD HASSAN,
MR. MUHAMMAD AMIN KHAN KUNDI

... MEMBER(Executive)
... MEMBER(Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER.- Arguments of the learned counsel for
the parties heard and record perused.

FACTS

2. The brief facts are that the appellant was appointed as Constable in 2004 and subsequently reached the rank of S.I. That 169 constables were recruited in FRP in 2013. The appellant as a member of the committee was assigned the task of receiving applications and scrutiny of the same including preparation of lists. As irregularities were committed in the recruitment process so departmental enquiry was conducted against the appellant and upon conclusion major penalty of compulsory retirement was imposed vide impugned order dated 09.01.2015

preferred departmental appeal on 12.01.2015 which was not responded, hence, the instant service appeal.

ARGUMENTS

3. Learned counsel for the appellant argued that disciplinary proceedings were initiated against the appellant being involved in illegal appointments in FRP and upon conclusion enquiry proceedings major penalty of compulsory retirement was imposed on him vide impugned order dated 09.01.2015. He preferred departmental appeal which was not responded within statutory period, hence, the instant service appeal. Enquiry was not conducted according to the procedure laid down in Police Rules 1975. Neither statement of witnesses were recorded nor opportunity was afforded to the appellant to cross examine the witnesses who had deposed against him. Opportunity of personal hearing was also denied to him in violation of rules. The appellant was member of the committee constituted by the respondents to carry out physical measurement, check age and documents of the applicants, who applied for the post of constable in FRP. The incharge of the committee must ensure that all rules are strictly followed in letter and spirit. It is clarified that Inspector Riaz Khan was the incharge of the enquiry committee and not the appellant. His role was confined only to enlistment while recruitment were made by the committee. It may not be out of place to mention here that recruitment committee notified vide order dated 05.08.2013 was mainly responsible for recruitment. The Provincial Police Officer vide order dated 20.08.2013 also approved the list of candidates recommended by the enquiry committee for appointment. Perusal of enquiry report would reveals that the enquiry committee failed to substantiate the charges leveled against the appellant in the charge sheet and statement of allegations

through solid evidence. Attention is invited to para-7 of the inquiry where the charge of destruction of record has been attributed to the appellant without any incriminating evidence. Conclusion drawn by the enquiry committee are generalized without support of documentary evidence. While serving show cause notice on the appellant copy of enquiry report was not provided which is not only a serious departure from the laid down procedure but countless judgments of the superior courts held it a serious irregularity in disciplinary proceedings. He also relied on judgment of this Tribunal dated 13.11.2015 passed in service appeal no. 1340/14, 1369/14 and 1370/2014 involving identical nature of cases/appeals. Appeal bearing no. 1055/15 was disposed of vide order dated 11.02.2016 and judgment dated 21.04.2016 in service appeal no. 872/2016 were also referred.

4. On the other hand learned Assistant Advocate General argued that all codal formalities were observed before passing the impugned order. He was treated according to law and rules, hence, there is no illegality in the said order.

CONCLUSION.

5. Careful perusal of record would reveal that enquiry was not conducted in mode and manner prescribed in the rules. Findings of the inquiry are based on surmises and conjectures which are not tenable in the eyes of law. Statements of witnesses were not recorded nor opportunity of cross examination was afforded to the appellant against those who had deposed against him. Opportunity of personal hearing was not afforded to the appellant though show cause notice was served on him but copy of enquiry report was not annexed with it which is a serious departure from the laid down procedure and tantamount to deficiency/lacuna in the disciplinary proceedings. Countless rulings of superior courts are available on this point and relief was given to the petitioners as prescribed

procedure was not adhered to. It is pertinent to point out that appellant being a subordinate member of a disciplined force could not afford to disagree with the directions of the seniors. He had a very limited role in recruitment and was subject to scrutiny by the superiors, who were ultimately responsible for appointments. The inquiry committee was required to have examined this important aspect of the case. Who compelled the superiors to blindly act upon the documents submitted by the subordinates? They were duty bound to scrutinize the same. Would it absolve them from their basic responsibility? It is just an attempt to provide safe passage to seniors and make subordinates scapegoat.

6. As a sequel to above, the appeal is accepted and the impugned order is set aside. The respondents are directed to conduct de-novo enquiry strictly in accordance with the rules within a period of 90 days from the receipt of this judgment. The issue of back benefits shall be subject to final outcome of the de-novo enquiry. Parties are left to bear their own costs. File be consigned to the record room.



(AHMAD HASSAN)
MEMBER


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

ANNOUNCED
01.01.2018

Order

01.01.2018

Counsel for the appellant and Mr. Usman Ghani, District Attorney for respondents present. Arguments heard and record perused.

Vide detailed judgment of today of this Tribunal placed on file, the appeal is accepted and the impugned order is set aside. The respondents are directed to conduct de-novo enquiry strictly in accordance with the rules within a period of 90 days from the receipt of this judgment. The issue of back benefits shall be subject to final outcome of the de-novo enquiry. Parties are left to bear their own costs. File be consigned to the record room.

Announced:
01.01.2018





(AHMAD HASSAN)
Member


(MUHAMMAD AMIN KHAN KUNDI)
Member

22.06.2017


Counsel for the appellant and Mr Kabir Ullah Khattak, Assistant AG for the respondents present. Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 21.08.2017 before D.B.


(Muhammad Amin Khan Kundi)
Member


(Gul Zeb Khan)
Member


21/8/2017

Appellant in person and Mr. Muhammad Adeel Butt, AAG for the respondents present. Due to non-availability of DB, case to come up for argument on 27/11/2017 before DB.


Reader

27.11.2017

Appellant in person and Addl: AG for respondents present. Due to general strike of the Bar arguments could not be heard. Adjourned. To come up for arguments on 01.01.2018 before D.B.


Member


Chairman

Order

01.01.2018

Counsel for the appellant and Mr. Usman Ghani, District Attorney for respondents present. Arguments heard and record perused.

Vide detailed judgment of today of this Tribunal placed on file, the appeal is accepted and the impugned order is set aside. The respondents are directed to conduct de-novo enquiry within a period of 90 days from the receipt of this judgment. The issue of back benefits shall be subject to final outcome of the de-novo enquiry. Parties are left to bear their own costs. File be consigned to the record room.

Announced:
01.01.2018

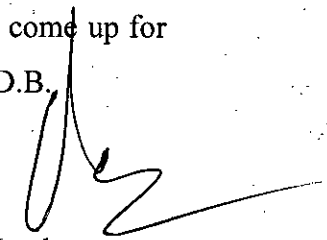
(AHMAD HASSAN)
Member

(MUHAMMAD AMIN KHAN KUNDI)
Member

04.07.2016


Counsel for the appellant and Mr. Muhammad Jan, GP for the respondents present. Learned counsel for the appellant requested for adjournment to file rejoinder. Request accepted. To come up for filing of rejoinder and arguments on 08.11.2016 before D.B.


Member


Member

08.11.2016


Counsel for the appellant and Mr. Ziaullah, GP for respondents present. Rejoinder submitted. To come up for arguments on 15.03.2017.


(MUHAMMAD AAMIR NAZIR)
MEMBER


(PIR BAKHSI SHAH)
MEMBER

15.03.2017

Appellant in person and Addl:AG for respondents present. Appellant requested for adjournment. Adjourned. To come up for arguments on 22.06.2017 before D.B.


(ASHFAQUE TAJ)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER


10.11.2015

Appellant in person and Mr. Ihsanullah, ASI (legal) alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 23.12.2015 before S.B.


Chairman

23.12.2015

Counsel for the appellant and Mr. Ihsanullah, Head Constable alongwith Addl: AG for respondents present. Comments submitted. The appeal is assigned to DB for rejoinder and final hearing on 06.04.2016.


Member

06.04.2016

Counsel for the appellant and Mr. Ziaullah, GP for respondents present. Rejoinder not submitted. Requested for further time for submission of rejoinder. To come up for rejoinder and arguments on

4-7-16


Member


Member

28.05.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was as ASI when 169 constables were recruited in FRP in the year 2013. That in the process of recruitment the appellant was one of the members of the committee to whom role of receiving applications and scrutiny of the same including preparation of list was assigned. That during the departmental enquiry the appointment of the said constables was found defective and the appellant being a member of the committee was also subjected to a subsequent departmental enquiry and vide impugned order dated 09.01.2015 he was compulsorily retired from service regarding which he preferred departmental appeal on 12.01.2015 which was not responded and hence the present service appeal on 08.05.2015.

Appellant Deposited
Security & Process Fee



That the appellant was having no role in appointment of constables and that he was wrongly subjected to enquiry and major penalty.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 28.08.2015 before S.B.


Chairman

28.08.2015

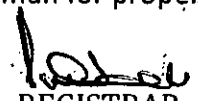

Agent of counsel for the appellant and Mr. Sahil Khan, H.C alongwith Assistant A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 10.11.2015 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 475 22015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	22.05.2015	<p style="text-align: center;">The appeal of Mr. Muhammad Ibrar resubmitted today by Mr. Sajjid Amin Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2		<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>28-5-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The joint appeal of Mr. Muhammad Ibrar Ex-Sub Inspector FRP received to-day i.e. on 08.05.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 5 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.
- 4- Annexures of the appeal may be attested.
- 5- copy of impugned order dated 9-1-2015 is illegible which may be replaced by legible/better one.
- 6- Wakalat nama is not attached with the appeal which may be placed on it.
- 7- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent in each appeal be submitted.


No. 695/S-1

Dt. 11/5/2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Ijaz Anwar Adv. Pesh.

Objections No 1 - Appeal signed by the Appellant
2 - Affidavit may be got attested by the Oath Commissioner
3 - Annexures serial wise in INDEX of Appeal
4 - Annex Appeal is attested by the Counsel
5 - Objection no 5 is erroneous Appeal
6 - Wakalat nama is attached to Appeal
7 - The copy of screen was placed on file


Ijaz Anwar

A

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 475 /2015

Muhammad Ibrar Ex Sub Inspector R/O P.O Nahaqi Daudzai
District Peshawar. **(Appellant)**

VERSUS

Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber
Pakhtunkhwa Civil Secretariat Peshawar and others.

(Respondents)

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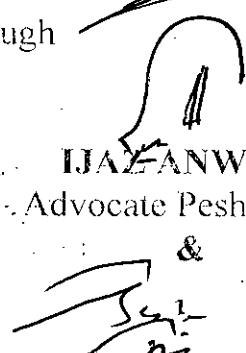
S. NO	Description of documents	Annexure	Page No
1	Memo of Appeal and Affidavit		1- 6
2	Copies of the Advertisement, orders dated 05.08.2013 and 22.07.2013, letter dated 10.08.2013, and waiting list.	A, B C & D	7- 26
3	Copy of order dated 25.8.2014.	E	27
4	Copy of charge sheet along with Statement of Allegations and reply to Charge Sheet.	F & G	28- 31
5	Copy of the Inquiry Report	H	32- 36
6	Copies of the Show Cause Notice and reply to the Show Cause Notice	I & J	37- 39
7	Copies of the order dated 09.01.2015	K	40
8	Copy of the Departmental Appeal.	L	41- 47
9	Vakalatnama		

Through


Applicant

IJAZ ANWAR

Advocate Peshawar


SAJID AMIN

Advocate Peshawar

1

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. 475 /2015

A.W.F. Province
Service Tribunal
Diary No. 467
Dated 08-5-2015

Muhammad Ibrar Ex-Sub Inspector R/O P.O Nahaqi Daudzai
District Peshawar.

(Appellant)

VERSUS

1. Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa Civil Secretariat Peshawar.
2. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
3. Commandant Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.

(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974, against the impugned order dated 09.01.2015 vide which the appellant was awarded major penalty of compulsory retirement, against which the departmental appeal dated 12.1.2015 has not been responded despite the lapse of 90 days statutory Period.

PRAYER IN APPEAL:

On acceptance of this appeal the impugned order dated 09.01.2015 of the learned Deputy Inspector General of police, Headquarters Khyber Pakhtunkhwa may graciously be set aside and the appellant may kindly be reinstated in service with full back wages and benefits.

Filed to-
Registrar
8/5/15.

Respectfully Submitted:

Re-submitted to-
and filed.

Registrar
22/5/15

1. That the appellant joined the service of the Police Department as Constable in year 2004 and then rose up to the post of Sub Inspector on account of his dedication, devotion and commitment to his job. He had 10 years unblemished service record at his credit.

2. That in the year 2013, recruitments of Constables were made in the Frontier Reserve Police, it is pertinent to mention here that those post against which appointments were made were duly advertised and committees were constituted for the purpose of selection of eligible candidates, the appellant was though no active in the process of appointments and he was only the member of one of the committees constituted for carrying out physical measurement and checking of Age /Documents of applicants for recruitment. *(Copies of the Advertisement, orders dated 05.08.2013 and 22.07.2013, letter dated 10.08.2013, and waiting list is attached as Annexure A, B , C & D)*
3. That in the year 2014 an inquiry was conducted against certain officials of the FRP, regarding irregularities in the recruitment of constables etc. initially the appellant was never associated at any stage with the inquiry so conducted, but strangely, he was placed under suspension on the basis of false and baseless allegations vide office order dated 25.8.2014. *(Copy of order dated 25.8.2014 is attached as annexure E).*
4. That thereafter a preliminary inquiry was conducted at the back of appellant in which neither any witness was examined nor the appellant was provided any opportunity of cross examination. But the inquiry committee on the basis of bald and naked evidence held the appellant guilty of charge of misconduct.
5. That the appellant was served with charge sheet along with statement of allegation. It was alleged that the appellant in conveyance with other officers facilitated the process of illegal recruitment of 378 candidates. It was further alleged that he also assisted in recruitment of 169 candidates appointed by un-notified committee and that he also processed the case regarding transfer of 37 constables to FRP Kohat for allotment of Constabulary numbers illegally. The appellant submitted reply and denied the allegations and also termed the same as fallacious, malicious and misconceived. He further added that he performed his duty justly, fairly and in accordance with law. He prayed that he may be exonerated of the charges leveled against him in the charge sheet. *(Copy of charge sheet along with statement of allegations and reply to Charge Sheet are attached as Annexure F & G)*
6. That the aforesaid reply was not found satisfactory and as such inquiry committee was constituted to probe into the allegations leveled against the appellant in the charge sheet. The appellant was summoned to appear before the committee and explain his position regarding the allegations. He participated in the inquiry, denied the allegations and reiterated the same facts and justification enumerated earlier but this statement of the appellant

was neither recorded nor was any witness examined in his presence. He was also not provided any chance of cross examination. The inquiry committee while recording its findings on surmises and conjunctures, held the appellant guilty of "irregularity and deviation from established rules and principles during the recruitment process in question is established beyond shadow of doubt. Muhammad Ibrar was the then OSI who acted in defiance of set rules and reportedly he was a central figure during the entire process. Having found guilty of malpractices, this inquiry committee recommends appropriate penalty admissible under the rules". **(Copy of the Inquiry Report is attached as Annexure H)**

7. That thereafter the appellant was served with show cause notice, though the copy of the inquiry report was not provide to the appellant along with the show cause notice. The appellant duly replied the show cause notice and refuted the allegations leveled as false and baseless. **(Copies of the Show Cause Notice and reply to the show cause notice is attached as Annexure I & J)**
8. That thereafter, the competent authority without applying his prudent mind and without considering the defence reply of the appellant, quite illegally awarded the appellant the major letter dated 10.08.2013 penalty of compulsory retirement from service vide order dated 9.1.2015. **(Copies of the order dated 09.01.2015, is attached as Annexure K)**
9. That the appellant submitted his departmental appeal dated 12.1.2015, however, it was not replied despite the lapse of 90 days, hence this appeal inter alia on the following grounds. **(Copy of the departmental appeal is attached as Annexure L).**
10. That the impugned order is illegal unlawful against the law hence liable to be set aside inter alia on the following grounds:

GROUND OF SERVICE APPEAL:

- A. That the appellant has not been treated in accordance with law hence his rights secured and gurantteed under the law are badly violated.
- B. That no proper procedure has been followed before awarding the major penalty to the appellant. He has not been properly associated with the inquiry proceedings nor any witness has been examined in his presence, moreover the appellant has not been given opportunity to cross examine those witnesses who may have deposed against him thus the whole proceedings are defective in te eye of law.

- C. That the appellant has not been allowed opportunity of personal hearing before the imposition of penalty upon him hence he has been condemned unheard.
- D. That no fair and impartial inquiry was constituted against the appellant in order to substantiate his guilt in respect of allegations leveled against him in the charge sheet. The inquiry committee neither examined any witness in the presence of appellant nor he was provided any chance of cross examination. Similarly, the statement of appellant was neither recorded nor his version in respect of charge was considered. Thus, the appellant has been condemned/penalized without being heard, contrary to the basic principle of natural justice known as "Audi Alteram Partem", therefore, the impugned order is against the legal norms of justice.
- E. That the inquiry committee examined all the fresh recruits/appointees in order to prove the allegations in respect of corruption against the appellant and co-accused. These witnesses have categorically admitted that they had not given any illegal gratification to any officer of the department in respect of their appointments despite the fact that they were thoroughly cross examined by the inquiry committee but nothing favorable could be elicited from their mouth in favor of the department against the appellant. It would be advantageous to reproduce herein the relevant portion of the said statement for facility of reference:-
- "This inquiry committee formerly recorded statement of recruits and none of them mentioned about bribing any police officer in getting appointment through this recruitment process"*
- F. That it is abundantly clear from the above statement that the stance of department in respect of corruption in the process of recruitment has been totally negated. But despite thereof, the inquiry committee has discarded this important piece of evidence without any cogent and valid reasons. Therefore, the impugned order passed on the basis of such findings is against the spirit of administration of justice.
- G. That the competent authority was bound under the law to examine the record of inquiry in its true perspective and in accordance with law and then to apply his independent mind to the merit of the case but he failed to do so and awarded major penalty of compulsory retirement from service to the appellant despite the fact that the allegations as contained in the charge sheet had not been proved in the so called inquiry, thus the impugned order has no sanctity under the law.

- H. That the duties of the appellant in the recruitment process was just to collect applications with documentary record from the candidates and make a list for high-Up i.e Recruitment Selection committee. He only made enlistment orders for selected candidates who were nominated/ selected by the Recruitment Selection Committee and forwarded them for further process.
- I. That the Charge of facilitating the illegal process of recruitment of 378 candidates in FRP Recruitment in the year 2013, is incorrect and baseless the appellant never facilitated anyone in the recruitment of candidates. The recruitment of 378 candidates without adopting procedure and schedule is totally incorrect and baseless. The recruitment of all these 378 candidates were made transparently after observing all codal formalities by the recruitment Selection Committee.
- J. That similarly the charge of pertaining to 169 candidates recruited by un-notified committee for the FRP HQRS. with connivance of the appellant is also baseless and self contradictory as it made clear that recruitment was made by a Recruitment Committee but the burden was put on the appellant, the appellant was having no link with the recruitment process except the duties explained in the above albeit he has been penalized.
- K. That the charge of transferring 37 constables without number to FRP Kohat where they allotted constabulary numbers is also incorrect and baseless. When the High-Ups signed and dispatched the Orders, the duty of the appellant was then just to receive those orders for OB and sent the copies to concerned for further necessary action.
- L. That the appellant has never committed any act or omission which could be termed as misconduct albeit he has been awarded the major penalty of compulsory of retirement from service. the appellant never violated any rule / procedure he performed his duties as assigned with zeal, devotion and sincerity.
- M. That the appellant was not provided the copy of the inquiry findings along with the show cause, which is mandatory in case of awarding major penalty. Therefore, the competent authority has blatantly violated the law laid down by august Supreme Court of Pakistan.
- N. That the competent authority has passed the impugned order in mechanical manner and the same is perfunctory as well as non speaking and also against the basic principle of administration of justice, therefore, the impugned order is not tenable under the law.

- O. That the impugned order is suffering from legal infirmities and as such the same is bad in law.
- P. That the facts and grounds mentioned in the replies to the charge sheet, show cause notice and departmental appeal of the appellant may kindly be read as integral part of the instant service appeal.
- Q. That the appellant has at his credit a long and spotless service career at his credit the penalty awarded to him is too harsh and liable to be set aside.
- R. That the appellant is jobless since the imposition of illegal penalty of compulsory retirement from service.
- S. That the appellant seeks the permission of this Honourable Tribunal to rely on additional grounds at the hearing of this appeal.

It is, therefore, humbly prayed that on acceptance of this appeal the impugned order dated 09.01.2015 may be set aside and the appellant may kindly be reinstated in service with all consequential/back benefits.

Through

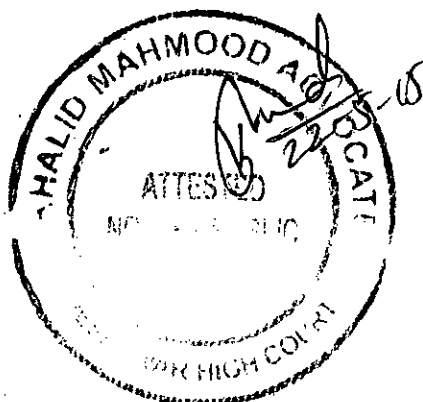
[Signature]
Appellant

IJAZ ANWAR
Advocate Peshawar

&
[Signature]
SAJID AMIN
Advocate Peshawar

AFFIDAVIT

I, **Muhammad Ibrar Ex Sub Inspector R/O P.O Nahaqi Daudzai District Peshawar** do hereby solemnly affirm and declare that the contents of the above appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.



[Signature]
Department

7



ANNEX 7-19

http://www.dailymashriq.com.pk

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

DAILY MASHRIQ PESHAWAR

پشاور

پاکستان

روزنامہ

سیّدناجی پیر شاہ

مشرق

پبلشنگ ہاؤس: 46-ایل

پشاور پبلشنگ ہاؤس، پشاور۔ فون: 3333333



46-ایل، پشاور۔ فون: 3333333

اشاعتی کاریراں

پاکستان میں پبلشنگ کاریراں کی تلاش کرنے والے لوگوں کے لیے ایک ایسی جگہ ہے جہاں ان کی معلومات اور ترقی کے مواقع فراہم کیے جاتے ہیں۔ اس جگہ پر پبلشنگ کاریراں کی تلاش کرنے والے لوگوں کو مختلف شعبوں میں کام کرنے کے مواقع فراہم کیے جاتے ہیں۔

پبلشنگ کاریراں کی تلاش کرنے والے لوگوں کو مختلف شعبوں میں کام کرنے کے مواقع فراہم کیے جاتے ہیں۔

پبلشنگ کاریراں کی تلاش کرنے والے لوگوں کو مختلف شعبوں میں کام کرنے کے مواقع فراہم کیے جاتے ہیں۔

(1) 2013-2014
(2) 2013-2014
(3) 2013-2014
(4) 2013-2014
(5) 2013-2014

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ORDER.

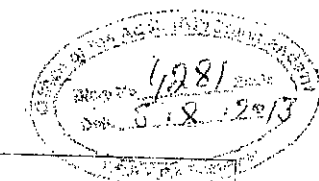
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Amended - B

In continuation of this office notification No.16982-88/E-II dated 16.07.2013, pertaining to constitution of committees for recruitment of constables in Khyber Pakhtunkhwa Police.

The composition of committees is hereby amended as under:-



S.No	Name of Regions	Recruitment Committee
1	Peshawar	1) Mr. Asif Zafar Cheema, DIG/Investigation HQrs: (Chairman) 2) Deputy Commandant FRP (Member) 3) DPO Concerned. (Secretary) 4) SP FRP Peshawar Range. (Member)
2	Mardan	1. Mr. Akhtar Hayat, DIG of Police. Chairman) 2. Mr. Masood Khalil, SSP. (Member) 3. DPO Concerned. (Secretary)
3	Hazara	1. Mr. Mubarak Zeb, DIG/E & I. Chairman) 2. Syed Fida Hussain Shah AIG/Establishment CPO (Member) 3. DPO concerned. (Secretary) 4. SP FRP Hazara Range Abbottabad (Member)
4	Malakand	1. Mr. Nisar Ahmad Tanoli DIG DCT. Chairman) 2. Mr Muhammad Quresh, AIG/F & P CPO. (Member) 3. DPO concerned. (Secretary) 4. SP FRP Malakand Range (Member)
5	Kohat	1. Mr. Azad Khan, DIG Bannu. Chairman) 2. DPO concerned. (Secretary) 3. SP FRP Kohat Range (Member)
6	Bannu	1. Mr. Muhammad Ali Baba Kheil DIG Mardan. Chairman) 2. Mr. Rab Nawaz Khan SP/HQrs Peshawar. (Member) 3. DPO concerned. (Secretary) 4. SP FRP Bannu Range (Member)
7	D.I.Khan	1. Mr. Idrees Khan DIG Investigation. Chairman) 2. DPO concerned. (Secretary). 3. SP FRP D.I Khan Range (Member)

(KHALID MASOOD)
Addl:IGP/Headquarters,
For Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar

No. 16982-88 /E-II, dated 5/8/2013.


Copy of above is forwarded to all concerned Officers for information and necessary action.

(9)

ORDER

The following Committee is constituted to carry out physical measurement and checking of Age/Documents of the applicants for recruitment as constable in FRP. The Incharge Committee must ensure that all rules are followed strictly in this regard and complete accuracy is ensured.

S. No	Name	Duties
1	Insp: Riaz Khan	Incharge
2	ASI Muhammad Ibrar	Naib Incharge
3	ASI Zahid Khan	Measurement
4	HC Ismail	
5	ASI Amjad	Checking of Age limit
6	ASI Zar Khan	
7	SI Mushtaq Khan	Measurement of Chest
8	HC Sheraz	


Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar

No.569-73/PA, dated Peshawar the 22 / 07 / 2013.

Copy of above is forwarded for information to:-

1. Addl: IGP/Commandant, FRP
2. DSP/FRP Hqrs:
3. Inspector Admin, FRP HQrs:
4. RI, FRP HQrs:
5. All concerned

10/07/13



From The Deputy Commandant
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar

To The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar

No. 595 /PA, dated Peshawar the 20 /08/2013.

Subject APPROVAL FOR APPOINTMENT

Memo:-

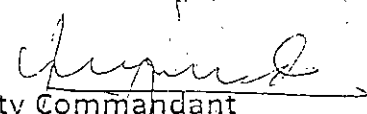
Several applications for recruitment as Constable received from different Ranges of FRP as per list attached.

All Candidates fulfill all codal formalities regarding Recruitment policy. They were present for Physical and written test at FRP Hqrs: Peshawar.

Being Candidate of different ranges instead of FRP Hqrs: and Peshawar Range, so far the Selection Committee was unable to enlist them as constable.

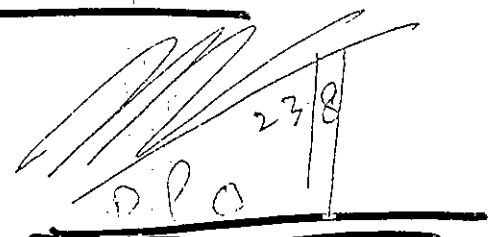
On perusal of vacancy position they can easily compensate.

It is therefore, requested that necessary approval for enlistment may be granted.


Deputy Commandant
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar

Continue transparency, merit must be observed through Committee.




D.P.O

(11) Annex: D

Waiting List Nominal Roll of FRP Hqrs. Peshawar Candidates of Different Ranges

Sr/No	Name	F/Name	District	Height	Chest	Physical	Written	Interview	Total Marks
1.	Kashif Jan	Tahir	Swat	5-8	33x34½	Passed	60	6	66
2.	Muhammad Suliman	Rozi Mand	Bunir	5-8	33x34½	Passed	60	6	66
3.	Muhammad Sajjad	Muhammad Ishaq	Peshawar	5-11½	33x34½	Passed	60	6	66
4.	Fahad Wali Shah	Inam	Lakki	5-7 ½	34x36	Passed	60	6	66
5.	Muhammad Asif	Per Muhammad	Lakki	5-8	33x34½	Passed	60	6	66
6.	Irfan Ullah	Azeem Khan	Bannu	5-9 ½	33x36½	Passed	60	6	66
7.	Hilal Khan	Jan Alam	Kohat	5-7 ¼	33x34½	Passed	60	5	65
8.	Zahir Uddin	Muhammad Ali	Chitral	5-7	35x37	Passed	60	5	65
9.	Atta ur Rahman	Gul Janan	DIK	5-11½	35x36	Passed	60	5	65
10.	Munsif Khan	Sultan Muhammad	Peshawar	5-8	33x34½	Passed	60	5	65
11.	Saif Irfan Uddin	Said Jamal Uddin	Chitral	5-7	33x34½	Passed	59	6	65
12.	Norman Riaz	Riaz Ahmad	Abbottabad	5-9 ½	33x34½	Passed	59	6	65
13.	Abid	Zaiwar Shah	Peshawar	5-8 ¾	35x36½	Passed	59	6	65
14.	Muhammad Kamran	Mushtaq	Peshawar	5-7 ¾	33x34½	Passed	59	6	65
15.	Qurban	Hakeem Baig	Chitral	5-7	36x37½	Passed	60	4	64
16.	Mohib ur Rahman	Noor Nawaz Khan	Bannu	5-8 ½	33x35	Passed	60	4	64
17.	Saif ur Rahman	Kabir Khan	DIK	5-8 ½	33x34½	Passed	60	4	64
18.	Naqeeb Uddin	Ghulam Muhiuddin	Chitral	5-7 ¾	33½x35½	Passed	59	5	64
19.	Mukhtiar Uddin	Shafi Uddin	Bannu	5-9	33x34½	Passed	59	5	64
20.	Zahir Ahmad	Mian Gul	Chitral	5-7	34x35½	Passed	59	5	64
21.	Shafiq Uddin	Khan Jan	Chitral	5-7 ½	33x34½	Passed	59	5	64
22.	Nadeem ul Hassan	Hayat Ali	Kohat	5-8 ½	34x36	Passed	59	5	64
23.	Fawab Khan	Mir Sawar	Bannu	5-7 ¼	35x37	Passed	59	5	64
24.	Hazrat Bilal	Ameer Muhammad	Peshawar	5-7 ¼	33x35	Passed	59	5	64
25.	Nigar Ali	Zaib Shah	Swat	5-8	33x34½	Passed	58	5	64
26.	Shahid Ahmad	Wazir Muhammad	Chitral	5-9 ½	33½x35½	Passed	58	5	64
27.	Anees ul Haq	Sher Azam	Dir	5-7 ½	34x35½	Passed	58	5	64
28.	Mujeeb ur Rahman	Mir Hakeem	Chitral	5-8	33x34½	Passed	58	5	64
29.	Khitab	Alfal	Bannu	5-9 ½	34x35	Passed	58	5	64
30.	Khan Zaman	Shadi Khan	Bannu	5-7	34x35½	Passed	58	5	64
31.	Bilal Ahmad	Muhammad Hashim	DIK	5-7 ¼	33x34½	Passed	58	5	64
32.	Sami ul Haq	Muhammad Latif	Chitral	5-9 ½	33x34½	Passed	58	5	64
33.	Arshid	Zubair	Bannu	5-7	35x37½	Passed	60	3	63
34.	Shah Fahad	Hussain Bacha	Peshawar	5-7 ¼	33x34½	Passed	59	4	63
35.	Muzamil Shah	Member Bustan	Shangla	5-7 ½	36x37½	Passed	59	4	63

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37.	Barkat Ullah	Ashraf Khel	Peshawar	5-9 1/2	35x37 1/2	Passed	59	1	63
38.	Hamid	Bakhti Muhammad	Swat	5-7	33x34 1/2	Passed	59	1	63
39.	Barkat Ullah	Alya Jan	Bannu Lakki	5-7	33x34 1/2	Passed	59	4	63
40.	Naeem Haider	Muzamil	Kohat	5-7 1/2	35x36	Passed	58	5	63
41.	Mir Alam	Kachkol	Peshawar	5-10 1/2	33x34 1/2	Passed	58	5	63
42.	Gul Hassan	Lal Hassan	Kohat	5-7	33x34 1/2	Passed	58	5	63
43.	Akhtar Hussain	Muhammad Zarin	MKD	5-11 1/2	33x34 1/2	Passed	58	5	63
44.	Ijaz Khan	Rasheed Khan	Bannu	5-7 1/2	34x36	Passed	58	5	63
45.	Tariq Muhammad	Shai Muhammad	Mardan	5-7 1/2	33x35	Passed	58	5	63
46.	Waqar Pervez	Shamshad	Swat	5-7 1/2	36x38	Passed	58	5	63
47.	Idress	Muhammad Khan	DIKhan	5-9 1/2	33x34 1/2	Passed	58	5	63
48.	Muhammad Noman	Muhammad Aslam	Peshawar	5-8	34x35	Passed	58	5	63
49.	Qayyum Ali	Saad Ullah Jan	Chitral	5-10 1/2	34x36	Passed	58	5	63
50.	Maqbool Ahmad	Ameer	Chitral	5-9 1/2	36x38	Passed	58	5	63
51.	Hassan Sardar	Khajid Khan	Mardan	5-11 1/2	34x36	Passed	58	5	63
52.	Sifat Ullah	Abdul Qayyum	DIK	5-7	36x38	Passed	58	5	63
53.	Abdur Rahman	Dada	Chitral	5-8	33x34 1/2	Passed	58	5	63
54.	Ilyas	Muhammad Ghilaf	Peshawar	5-11 1/2	33x35	Passed	58	5	63
55.	Rahmat Karim	Sher Ali	Chitral	5-7	33x34 1/2	Passed	58	5	63
56.	Farhat ullah	Ihsan Ullah	Peshawar	5-7 1/2	33x34 1/2	Passed	57	6	63
57.	Muhammad Alam	Gulafam	Bannu	5-11 1/2	34x35 1/2	Passed	57	6	63
58.	Aziz Uddin	Aziz ur Rahman	Chitral	5-11 1/2	34x36	Passed	57	6	63
59.	Mahboob Alam	Shahi Sultan	Shangla	5-9 1/2	38x40	Passed	57	6	63
60.	Nisar Muhammad	Khan Muhammad	Peshawar	5-9	34x35	Passed	57	6	63
61.	Muhammad Saqib	Muhammae Farooq	Karak	5-8 1/2	33x34 1/2	Passed	57	6	63
62.	Lal Bahadar	Islam Bahadar	Swabi	5-11	33x34 1/2	Passed	57	6	63
63.	Mubashir	Noor ul Hayat	Swabi	5-9 1/2	33x34 1/2	Passed	58	4	62
64.	Miraj Uddin	Sherin Jan	Chitral	5-9	33x34 1/2	Passed	58	4	62
65.	Wasi Ullah	Sher Dil	Bannu	5-7 1/2	34x36	Passed	58	4	62
66.	Younas	Naqceb Ullah	Bannu	5-7	33x35	Passed	58	4	62
67.	Ibrar Hussain	Fasal Diyan	Shangla	5-9	35x37	Passed	58	4	62
68.	Muhammad Tufail	Mir Baz	DIK	5-7 1/2	33x34 1/2	Passed	58	4	62
69.	Kaleem Ullah	Shah Nawaz	DIK	5-7 1/2	35x37	Passed	58	4	62
70.	Hadis Abbasi	Abdul Qayyum	Chitral	5-7	33x34 1/2	Passed	57	5	62
71.	Muhammad Asghar	Afsar Shah	Hazara	5-9	34x36	Passed	57	5	62
72.	Abdur Rahim	Yormast Kahn	Chitral	5-7	33x34 1/2	Passed	57	5	62
73.	Muhammad Ilyas	Amin Jan	Peshawar	5-7 1/2	33x34 1/2	Passed	57	5	62
73.	Muhammad Bilal	Muhammad Ayub	Peshawar	5-8	33x34 1/2	Passed	57	5	62

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74.	Janzeb	Gul Daraz	DIK	5-9 ½	33x35½	Passed	57	5	62
75.	Said Daraz	Sarfraz	MKE	5-7 ½	36x37½	Passed	57	5	62
76.	Muhammad Niaz	Mian Sherin	Swat	5-7	35x36	Passed	57	5	62
77.	Shahzeb Shah	Rifaqat Shah	Hazara	5-7 ½	33x34½	Passed	57	5	62
78.	Abdur Rahman	Yaqoob Khan	Bannu	5-7	34x35	Passed	57	5	62
79.	Muhammad Ayaz	Buzurg Khan	Chitral	5-7	33x35	Passed	57	5	62
80.	Javed Iqbal	Zafar Iqbal	DIK	5-8 ½	33x34½	Passed	57	5	62
81.	Amir Ali	Sahar Ali	Kohat	5-7 ¾	33x34½	Passed	57	5	62
82.	Asif Khan	Musam Khan	Peshawar	5-9 ¼	33x34½	Passed	57	5	62
83.	Muhammad Yousaf	Muhammad Iqbal	Peshawar	5-7	33x34½	Passed	57	5	62
84.	Rahim Shah	Bakht Rawan	Shangla	5-8 ½	33x34½	Passed	57	5	62
85.	Muhammad Nadeem	Muhammad Sohrab	Swat	5-9	33x34½	Passed	57	5	62
86.	Muhammad Junaid	Muhammad Usman	Bannu	5-7 ¾	33x34½	Passed	57	5	62
87.	Jibran Ahmad	Mukhtiar Ahmad	Peshawar	5-11¼	33x34½	Passed	57	5	62
88.	Muhammad Ayaz	Waris Khan	Peshawar	5-8	33x35	Passed	57	5	62
89.	Kashif	Zarin Khan	Kohat	5-11½	33x34½	Passed	57	5	62
90.	Dost Muhammad	Shams ur Rahman	Peshawar	5-7	33x35	Passed	57	5	62
91.	Ihsan Ullah	Ghulam Hassan	Peshawar	5-7 ½	34x36	Passed	57	5	62
92.	Arshid Khan	Deran Gul	Kohat	5-8	33x34½	Passed	57	5	62
93.	Asghar Hussain	Nazir Hussain	Hazara	5-7	34x36	Passed	57	5	62
94.	Irfan ullah	Musa Khan	DIK	5-9 ½	35x37	Passed	57	5	62
95.	Muhammad Farooq	Taza Gul	Peshawar	5-8	33x34½	Passed	56	6	62
96.	Irfan Ullah	Mumtaz	Bannu	5-7 ¼	33x34½	Passed	56	6	62
97.	Murad Ali	Adil	Swat	5-7	36x38	Passed	56	6	62
98.	Muhammad Sharif	Muhammad Gul	Swat	5-7 ½	35x37	Passed	56	6	62
99.	Imran Khan	Ameer Muhammad	Chitral	5-8 ½	33x34½	Passed	56	6	62
100.	Ahmad Nawaz	Khusru Nawaz	Peshawar	5-7	33x34½	Passed	56	6	62
101.	Ibad Ullah	Fazal Akbar	Chitral	5-7	33x34½	Passed	56	6	62
102.	Maqsood ur Rahman	Mir Gulab	Chitral	5-7	33x34½	Passed	56	6	62
103.	Muhammad Roman	Zahir Shah	Peshawar	5-9 ¼	33x34½	Passed	56	6	62
104.	Imtiaz Ahmad	Mir Fayat	Chitral	5-8 ½	33x35	Passed	56	6	62
105.	Wafeed Ullah	Raees Khan	Bannu	5-11½	33x34½	Passed	56	6	62
106.	Kamran	Zain ul Abidin	Peshawar	5-7 ¾	34x35	Passed	56	6	62
107.	Muhammad Bilal	Muhammad Arshid	Kohat	5-7	33x34½	Passed	56	6	62
108.	Mehmood Khan	Abdul Ghaffar	DIK	5-11½	33x34½	Passed	58	3	61
109.	Fakhruddin	Atlas Khan	Bannu Lakki	5-9 ½	33x35	Passed	57	4	61
110.	Nacem Uddin	Ameer Uddin	Chitral	6-0	35x36	Passed	57	4	61
111.	Saddam Hussain	Siraj	Swat	5-9	35x36	Passed	57	4	61

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72.	Rahmat Jafil	Ali Rahmat	Chitral	5-9 1/2	33x34 1/2	Passed	56	4	61
73.	Iltaf Ahmad	Mahrab Khan	Chitral	5-10	33x34 1/2	Passed	56	4	61
114.	Abdur Rahman	Mir Wali	Chitral	5-7 3/4	36x37 1/2	Passed	56	4	61
115.	Ghyaz Uddin	Nizam Uddin	Chitral	6-1 1/2	35x37 1/2	Passed	56	4	61
116.	Farhan Shah	Khyber Shah	Hazara	5-8	33x35	Passed	56	5	61
117.	Mukhtiar Ahmad	Takbeer Shah	Chitral	5-9 1/2	35x36	Passed	56	5	61
118.	Muhammad Naem	Ibrahim	Peshawar	5-8	33x34 1/2	Passed	56	5	61
119.	Ijaz ul Haq	Mubarak Shah	Chitral	5-7	33x35 1/2	Passed	56	5	61
120.	Muhammad Zeeshan	Muhammad Ikram	DIK	5-11 1/2	33x34 1/2	Passed	56	5	61
121.	Wasim Ullah	Amin Ullah	Mardan	5-7 1/4	33x35	Passed	56	5	61
122.	Basit Ali	Sadiq Hussain	Hazara	5-9 1/2	33x34 1/2	Passed	56	5	61
123.	Hamaç	Jan Alam	Peshawar	5-8 3/4	34x35	Passed	56	5	61
124.	Said Daraz	Haji Faraz	Kohat	5-7 1/2	36x38	Passed	56	5	61
125.	Javed	Abdur Rahman	Bannu	5-9 1/2	34x36	Passed	56	5	61
126.	Adnan	Said Nawaz	Bannu	5-7	33x34 1/2	Passed	56	5	61
127.	Muhammad Ibrahim	Ubaid Ullah	DIK	5-9 1/2	33x34 1/2	Passed	56	5	61
128.	Asad ur Rahman	Haji Rahman	Chitral	5-11 1/2	35x37	Passed	56	5	61
129.	Ismail	Aziz	Bannu	5-7 1/2	33x34 1/2	Passed	56	5	61
130.	Asghar Khan	Nazar Muhammad	Peshawar	5-8	33x34 1/2	Passed	56	5	61
131.	Tariq Hussain	Dilawar Khan	Bannu	5-9 1/2	33x35	Passed	56	5	61
132.	Barkat Ullah	Gul Zuban	Bannu	5-7 3/4	34x35 1/2	Passed	56	5	61
133.	Iltaf ur Rahman	Gulzar Khan	Chitral	5-7 1/2	33x34 1/2	Passed	56	5	61
134.	Amar Ullah	Fayo Khan	Peshawar	6-0	33x35 1/2	Passed	56	5	61
135.	Gul Wali	Mir Kalan	Bannu Lakki	5-7	34x36	Passed	56	5	61
136.	Said Faizan	Said Abdul Rauf	Peshawar	5-8 1/2	34x36 1/2	Passed	56	5	61
137.	Muhammad Faizullah	M. Kifayatullah	Chitral	5-7 3/4	35x36	Passed	56	5	61
138.	Abdul Faraz	Mir Daraz	Bannu	5-7	34x35	Passed	56	5	61
139.	Sami Ullah	Buzurg Khan	Chitral	5-9 1/2	35x36	Passed	56	5	61
140.	Rahmat Alam	Sher Muhammad	Chitral	5-9	33x34 1/2	Passed	56	5	61
141.	Abdul Hameed	Abdul Majeed	Chitral	5-7 3/4	33x34 1/2	Passed	56	5	61
142.	Danish	Falak Niaz	Peshawar	5-8	33x34 1/2	Passed	56	5	61
143.	Nisar Khan	Feroz Khan	Chitral	5-7	34x35	Passed	56	5	61
144.	Shah Faisal	Ali	Mardan	5-9	35x36	Passed	56	5	61
145.	Sajid	Umar Daraz	Swabi	5-8 1/2	33x35	Passed	56	5	61
146.	Sarfar Uddin	Sarwar Uddin	Chitral	5-7 1/2	33x34 1/2	Passed	56	5	61
147.	Rafiq Ullah	Saleh	Bannu	5-9	33x34 1/2	Passed	56	5	61
148.	Inayat ur Rahman	Abdur Rauf	Peshawar	5-10	33x34 1/2	Passed	56	5	61
149.	Muhammad Tariq	Firzon Khan	Chitral	6-1 1/2	35x36	Passed	56	5	61

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	Salman	Fida	Swat	5-11	33x35	Passed	56	4	60
	Barkat Ullah	Gul Sufaid	Bannu	5-7	33x35	Passed	56	4	60
152.	Daud Khan	Shakir Khan		5-7 1/2	33x35	Passed	56	4	60
153.	Sami ul Haq	Mirza Wali Khan	Chitral	5-7	34x35	Passed	56	4	60
154.	Asmat Ullah	Sarzamin	Dir	5-8 1/2	33x35	Passed	56	4	60
155.	Fahad wali	Wali Shah	MKD	5-11 1/2	39-41	Passed	56	4	60
156.	Inayat Ullah	Bulbul Diyan	Chitral	5-8	33x35	Passed	56	4	60
157.	Adnan Khan	Mukhtiar Wahid		5-8	34x35	Passed	56	4	60
158.	Fahim Ali	Qaim Ali	Kohat	5-8 1/2	33x35	Passed	56	4	60
159.	Ajmal	Abdul Sattar	MKD	5-7 1/4	34x36	Passed	56	4	60
160.	Kashif Javed	Javed Akbar	Peshawar	5-7	34x35	Passed	56	4	60
161.	Ameer Ullah	Ghulam Hasrat		5-9	33x34	Passed	56	4	60
162.	Sher Alam	Sadbar Khan	Shangla	5-7 1/2	34x35	Passed	56	4	60
163.	Sifat Ullah	Farman Ullah	Bannu	5-7	36x38	Passed	56	4	60
164.	Muhamamad Bakhtiar	Atta Muhammad	Peshawar	5-9	33x35	Passed	56	4	60
165.	Zahid	Bil-Qiyas	Bannu	5-11 1/2	34x36	Passed	56	4	60
166.	Saddam	Fazal Rohar		5-11 1/4	33x34	Passed	56	4	60
167.	Mehmood Riaz	Fazal Ahid	Chitral	5-9 1/2	33x34	Passed	56	4	60
168.	Muhamamad Rizwan	Mukhtiar Ahmad	Peshawar	5-8	33x35	Passed	56	4	60

Chairman

(MUHAMMAD ASIF ZAFAR CHEEMA)
Deputy Inspector General of Police,
(Inv/HQrs), CPO,
Khyber Pakhtunkhwa, Peshawar

Member

(YOUNAS JAVED MIRZA)
Acting Deputy Commandant
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar

Member

(YOUNAS JAVED MIRZA)
Superintendent of Police, FRP,
Peshawar Range, Peshawar

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Waiting List Nominal Roll of FRP Hqrs: Peshawar Candidates of Different Ranges

Sl No.	Merit No.	Name	FName	District	Height	Chest	Physical	Written	Interview	Total Marks
1	169	Munir Ali	Im Sher	Shangla	5-9	34x36	Passed	55	4	59
2	170	Saddam	Lal Said	Malakand	5-11½	35x37	Passed	55	4	59
3	171	Tuqeer Nasir	Harq Shah	Swabi	5-8	33x34 ½	Passed	54	5	59
4	172	Tariq Ullah	Sard Ali Khan	Bannu	5-8	33x34 ½	Passed	54	5	59
5	173	Suliman	Jan Muhammad	Swabi	5-9 ½	33x34 ½	Passed	54	5	59
6	174	Mustafa Khan	Haq Nawaz Khan	Lakki	5-7	33x35	Passed	54	5	59
7	175	Zahid Ullah	Aziz ur Rahman	Bannu	5-11½	35x37	Passed	55	4	59
8	176	Javed Khan	Masti Khan	Bannu	5-8 ½	35x37	Passed	55	4	59
9	177	Sabz Ali	Anwar Baig	Shangla	5-11½	36x38	Passed	55	4	59
10	178	Arif Ullah	Ayub Khan	Bannu	5-10	33x34 ½	Passed	54	5	59
11	179	Aman Ullah	Sattar Khan	Bannu	5-7 ½	33x35	Passed	54	5	59
12	180	Lais Khan	Malkiyaz Khan	Karak	5-7 ½	35x36	Passed	54	5	59
13	181	Zarabat Khan	Shah Qiyaz Khan	Bannu	5-7 ½	34x36	Passed	55	4	59
14	182	Amir Ali	Nawab Khan	Swabi	5-7 ½	33x34 ½	Passed	54	5	59
15	183	Zahid	Muhammad Hussain	Abbottabad	5-7 ½	35x36	Passed	54	5	59
16	184	Ijaz Ahmad	Saad Ayaz	Bannu	5-8 ½	35x37	Passed	55	4	59
17	185	Aziz Ullah	Mashk-e-Alam	Lakki	5-8	35x37 ½	Passed	55	4	59
18	186	Muhammad Imtiaz	Bacha Mir	Lakki	5-8	35x37 ½	Passed	54	5	59
19	187	Farid Ullah	Gul Rabbani	Bannu	5-9 ½	33x34 ½	Passed	54	5	59
20	188	Sajid Ali	Libas Khan	Swabi	5-9 ½	33x34 ½	Passed	54	5	59
21	189	Muhammad Farooq	Sher Azam	MKD	5-9 ½	36x37 ½	Passed	55	4	59
22	190	Waheed Ullah	Said Karim Khan	Shangla	5-9 ½	36x37 ½	Passed	55	4	59
23	191	Tajdar Khan	Akbar Zaman	Bannu	5-10	33x34 ½	Passed	54	5	59
24	192	Aurangzeb	Ghazi Gul	Bannu	5-11½	36x38	Passed	54	5	59
25	193	Jehanzeb Khan	Abdul Waheed	Lakki	5-9 ½	34x36	Passed	54	5	59
26	194	Hazir Khan	Dirmand Khan	Shangla	5-11½	34x35	Passed	54	5	59
27	195	Asad Zaman	Wali Muhammad	Swabi	5-7	34x36	Passed	55	4	59
28	196	Hassan Baig	Adina Baig	Chitral	5-9	36x38	Passed	55	4	59
29	197	Imran Ullah	Faiz Ullah	DIK	6-1½	35x35	Passed	55	4	59
30	198	Iqar Ullah	Nasrullah Khan	Bannu	5-7 ½	33x34 ½	Passed	55	4	59
31	199	Muhammad Zohaib	Farooq Khan	Lakki	5-8	35x37 ½	Passed	54	5	59
32	200	Irfan Ullah	Hati Khan	Lakki	5-7 ½	33x35	Passed	54	5	59
33	201	Azmat Ullah	Muhammad Azam	Karak	5-8	35x37	Passed	54	5	59
34	202	Said Karim	Norin Zada	Shangla	5-7 ½	34x36	Passed	54	5	59

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		shahzad	Muhammad Sadiq	Malakand	5-10 1/2	33x34 1/2	Passed	54	5	59
	204	Fazal Rahman	Akbar Zaman	Lakki	5-7	33x35	Passed	55	4	59
37.	205	Zakir Ahmad	Wali Muhammad	Chitral	5-8	33x34 1/2	Passed	54	5	59
38.	206	Hazrat Umar	Said Umar Khan	Shangla	5-9	34x36	Passed	54	5	59
39.	207	Sami Ullah	Ajab Khan	Bannu	5-8 1/2	34x35 1/2	Passed	54	5	59
40.	208	Sana Ullah	Asmati Khan	Chitral	5-9 1/2	34x36	Passed	54	5	59
41.	209	Awais	Haleem Khan	Swabi	5-8 1/2	34x35 1/2	Passed	55	4	59
42.	210	Safer Ullah	Dilabaz Khan	Bannu	5-9	33x34 1/2	Passed	54	5	59
43.	211	Wajid Ullah	Rahim Khan	Karak	5-7	34x36	Passed	55	4	59
44.	212	Muhammad Suliman	Muhammad Yousaf	DIK	6-1 1/2	33x35	Passed	54	5	59
45.	213	Hussain Ahmad	Nadran Shah	Chitral	5-10 1/2	33x34 1/2	Passed	55	4	59
46.	214	Javed Khan	Hayat Ullah Khan	Bannu	5-9	36 1/2 x38	Passed	54	5	59
47.	215	Umar Bacha	Muhammad Jalil	Shangla	5-9	36x38	Passed	55	4	59
48.	216	Sher Azam	Sultan Afsar	Hari Pur	5-9 1/2	33x34 1/2	Passed	55	4	59
49.	217	Muhammad Sajid	Faiz Rahman	DIK	5-10 1/2	33x34 1/2	Passed	55	4	59
50.	218	Gul Hassan	Ghulam Hassan	MKD	5-9	33x34 1/2	Passed	54	5	59
51.	219	Zubair Khan	Sher Mastan	Shangla	5-8	33x34 1/2	Passed	54	5	59
52.	220	Aqil Faraz	Zakir Shah	Hari Pur	5-11 1/2	34x35	Passed	55	4	59
53.	221	Abbas Khan	Abdul Aziz	Swabi	5-9	36 1/2 x38	Passed	54	5	59
54.	222	Hafeez ur Rahman	Mir Rahman	Bannu	5-7	33x34 1/2	Passed	54	4	58
55.	223	Ikram Khan	Muhammad Sarwat	Malakand	5-7 1/2	36x37 1/2	Passed	54	4	58
56.	224	Irfan Ullah	Mumtaz Khan	Bannu	5-7	35x36	Passed	53	5	58
57.	225	Laiq Zaman	Wahid Zaman	Swabi	5-7 1/2	33x34 1/2	Passed	54	4	58
58.	226	Abdul Baseer	Jehangir Khan	Lakki	5-7 1/2	38 1/2 x40	Passed	54	4	58
59.	227	Shah Khalid	Gul Muhammad	Bannu	5-7	33x34 1/2	Passed	53	5	58
60.	228	Amin Ullah	Sami Ullah	Bannu	5-8 1/2	33x34 1/2	Passed	54	4	58
61.	229	Umair Ahmad	Rasheed Ahmad	DIKhan	5-10 1/2	34x36	Passed	54	4	58
62.	230	Naeem Ullah	Muhammad Noor	Bannu	5-8	33x34 1/2	Passed	53	5	58
63.	231	Mohsin Ali	Shah Zaman	Abbotabad	5-7 1/2	34x36	Passed	52	5	58
64.	232	Hayat Ullah	Chamni Khan	Shangla	5-8	33x34 1/2	Passed	54	4	58
65.	233	Umar Sadiq Khan	Aman Ullah	Bannu	5-8	34x36	Passed	54	4	58
66.	234	Muhammad Ali	Qabil Shah	Hari Pur	5-8	33x35	Passed	54	4	58
67.	235	Muhammad Jalal	Bacha Said	Malakand	5-7 1/2	33x34 1/2	Passed	53	5	58
68.	236	Akbar Khan	Kabil Sher	Swabi	5-11 1/2	34x36	Passed	54	4	58
69.	237	Fazal Hadi	Saif ul Haq	Shangla	5-7	33x34 1/2	Passed	54	4	58
70.	238	Muhammad Mustafa	Zari Gul Khan	Bannu	5-7 1/2	33x35	Passed	54	4	58
71.	239	Irfan Ullah	Abdul Ghaffar	Lakki	5-8	34 1/2 X36	Passed	53	5	58

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74.	241	Naveed Shah	Zakir Shah	Hari Pur	5-8 1/2	34x35	Passed	54	4	58
	241	Muhammad Shakeel	Mukaram Shah	Malakand	5-11 1/2	34x35	Passed	54	4	58
	242	Farukh Zeb	Gohar Zad	Bannu	5-8	35x36	Passed	54	4	58
75.	243	Qaid Ali	Sabir Khan	Swabi	5-7	33x34 1/2	Passed	54	4	58
76.	244	Izhar Ahmad Khan	Shahriyar Ali Khan	Lakki	5-9 1/2	33x34 1/2	Passed	54	4	58
77.	245	Sajid Ullah	Ubaid Ullah	Chitral	5-8 1/2	35x36 1/2	Passed	54	4	58
78.	246	Sadiq ur Rahman	Akbar Zaman	Lakki	5.7	34x35 1/2	Passed	54	4	58
79.	247	Arshid Hussain	Rahim Shah	Malakand	5-9 1/2	33x35 1/2	Passed	53	5	58
80.	248	Fazal Khuda	Noor Faraz Khan	Dir Lower	5-7	34x36	Passed	54	4	58
81.	249	Anwar Kamal	Hawaladar Khan	Lakki	5-9 1/2	33x34 1/2	Passed	54	4	58
82.	250	Ubaid ur Rahman	Ghulam Jan	DIK	5-7 1/2	33x35 1/2	Passed	54	4	58
83.	251	Salman Ghafar	Muhammad Ghafar	Chitral	5-8	33x35	Passed	53	5	58
84.	252	Waqar	Khan Afsar	Hari Pur	5-8 1/2	33x34 1/2	Passed	53	5	58
85.	253	Said Muhammad Khan	Said Muhammad Khan	Bunir	5-7 1/2	39x41	Passed	53	5	58
86.	254	Asmat Ullah Khan	Muhammad Bashir	Bannu	6.1	36 1/2 x38	Passed	54	4	58
87.	255	Muhammad Zahid	Noor Khan	Lakki	5-7	33x34 1/2	Passed	54	4	58
88.	256	Gul Imtiaz Khan	Muhammad Sardar	Bannu	5-11	33x34 1/2	Passed	53	5	58
89.	257	Muhammad Ali	Basher Ahmad	DIKhan	5.7	33x34 1/2	Passed	53	5	58
90.	258	Said Ayaz Khan	Rasool Ghulam	Lakki	5.7	33x34 1/2	Passed	53	5	58
91.	259	Mashkor Ullah	Sani Marjan	Bannu	5-8	34x35	Passed	54	4	58
92.	260	Muhammad Farhad	Khan Gul	Karak	5-8	35x37	Passed	54	4	58
93.	261	Maaz Ullah	Khan Badshah	Shangla	5-9	33x34 1/2	Passed	54	4	58
94.	262	Sohail Khan	Zarshad Khan	Swabi	5-7	35 1/2 X37	Passed	52	5	57
95.	263	Naeem Khan	Ayub Khan	Bannu	5-7 1/2	35 1/2 X37	Passed	52	5	57
96.	264	Saddam Khan	Fazal Khan	Haripur	5-9	33x34 1/2	Passed	52	5	57
97.	265	Inam Ullah	Saleem Khan	Lakki	5-9 1/2	33x34 1/2	Passed	52	5	57
98.	266	Muhammad Muntaz	Muhammad Ramzan	DIK	5-9	34x36	Passed	52	5	57
99.	267	Ibad Ali	Dilbar Khan	Swabi	5-10 1/2	34x36	Passed	52	5	57
100.	268	Shahin Iqbal	Muslim Khan	Karak	5-9 1/2	33x34 1/2	Passed	52	5	57
101.	269	Amjad Hussain	Fida Shah	Chitral	5-7 1/2	39x41	Passed	52	5	57
102.	270	Khanzada Khan	Gul Sarwar Khan	Bannu	6.1	35x37	Passed	52	5	57
103.	271	Momin Khan	Sarzamin Khan	Shangla	5.7	33x34 1/2	Passed	52	5	57
104.	272	Rashid Khan	Ahmad Ullah	Shangla	5.8	33x34 1/2	Passed	52	5	57
105.	273	Tawab Khan	Bala Amin Khan	Bannu	5 1/2	33x35	Passed	52	5	57
106.	274	Jan Alam	Mukhtiar	Shangla	5-7 1/2	33x34 1/2	Passed	52	5	57
107.	275	Zahid Ullah	Hassan Khan	Lakki	5-7	33x34 1/2	Passed	52	5	57
108.	276	Fida Hussain Shah	Said Nazeer Shah	Hari Pur	6.1	36 1/2 x38	Passed	53	4	57


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		Imor Khan	Poshad Khan	Swabi	5-11	33x34 1/2	Passed	52	5	57
110.	277	Mohsin Raza	Sajjad Hussain	DIK	5-7 1/2	34x35 1/2	Passed	53	4	57
111.	278	Muhammad Ali	Ghaffar Ali	Bannu	5-7	34x35 1/2	Passed	53	4	57
112.	279	Asif Khan	Ali Sher	Shangla	5-7	34x36	Passed	52	5	57
113.	280	Inayat Ullah	Hayat Ullah Khan	Bannu	5-7 1/2	33x34 1/2	Passed	52	5	57
114.	281	Muhammad Israr	Mir Wali	Bannu	5-8	33x34 1/2	Passed	53	4	57
115.	282	Salmat Khan	Sher Bahadar	Bannu	5-9	34x36	Passed	53	4	57
116.	283	Said Hanif Shah	Sher Zada	Shangla	5-7 1/2	34x35 1/2	Passed	52	5	57
117.	284	Khalid Usman	Bismillah Jan	Karak	5-7	34x36	Passed	53	4	57
118.	285	Noman Khan	Meher Ban Khan	Bannu	5-7 1/2	37x39	Passed	52	5	57
119.	286	Shakir Ullah	Naqeb Ullah	Bannu	5-11	33x34 1/2	Passed	53	4	57
120.	287	Habib Ullah	Ghulam Rasool	Bannu	5-8	36x38	Passed	52	5	57
121.	288	Abdul Haseeb	Abdul Matin	Chitral	5-8	36x38	Passed	52	5	57
122.	289	Abdul Haseeb	Abdul Matin	Bannu	5-7	34x36	Passed	52	5	57
123.	290	Naimat Ullah	Feroz Khan	Bannu	5-7	34x36	Passed	52	5	57
124.	291	Rahmat Ullah	Kabir Khan	Lakki	5-8 1/2	34x35	Passed	52	5	57
125.	292	Rahmat Ullah	Kabir Khan	Lakki	5-8 1/2	35x36 1/2	Passed	52	5	57
126.	293	Akbar Zaman	Abdullah	Lakki	5-8 1/2	34x36	Passed	53	4	57
127.	294	Wasim Abbas	Saleem Raza	DIK	5-8	34x36	Passed	53	4	57
128.	295	Hikmat Ullah Shah	Qamar A. Shah	Bannu	5-7 1/2	33 1/2	Passed	53	4	57
129.	296	Muhammad Haroon	Muhammad Ayub	DIKhan	5-7 1/2	34x36	Passed	52	5	57
130.	297	Asif Iqbal	Muhammad Iqbal	DIK	5-7	34x35	Passed	53	4	57
131.	298	Fayyaz Ahmad	Sher Muhammad	DIK	5-7	34x36	Passed	53	4	57
132.	299	Hassan Shah	Javed Hassan Shah	Kohat	5-8 1/2	34x35	Passed	53	4	57
133.	300	Nizam Shah	Yaqoob Shah	Hari Pur	5-11	33x34 1/2	Passed	52	5	57
134.	301	Izat Khan	Yousaf Khan	Lakki	5-7 1/2	34 1/2 X36	Passed	53	4	57
135.	302	Mushtaq Ahmad	Sher Ahmad	Bannu	5-8 1/2	34x35	Passed	52	5	57
136.	303	Muhammad Wasim	Muhammad Ashraf	Hari Pur	5-9 1/2	33x35 1/2	Passed	52	5	57
137.	304	Zaheer Ahmad	Basher Ahmad	Hari Pur	5-8	34x35	Passed	52	5	57
138.	305	Mushtaq	Sultan	Karak	5-8	33x35	Passed	53	4	57
139.	306	Rafi Ullah	Zakir Ullah	Malakand	5-8	34 1/2 X36	Passed	53	4	57
140.	307	Meraz Khan	Geraz Khan	Bannu	5-7	34x36	Passed	52	5	57
141.	308	Khaliq ur Rahman	Mehrab Nabi	Chitral	5-7	34x35	Passed	52	5	57
142.	309	Hamayyun Khan	Babar Khan	Lakki	5-7	34x35	Passed	53	4	57
143.	310	Gul Raqyaz	M. Sarwar	Bannu	5-7	34x36	Passed	53	4	57
144.	311	Irshad Ali	Saleem Khan	Shangla	5-7	34x36	Passed	52	5	57
145.	312	Ikram Ullah	Ghulam Hassan	Lakki	5-8 1/2	34x36	Passed	52	5	57
146.	313	Noman Khan	Fakhar Zaman	Bannu	5-7 1/2	34x36	Passed	53	4	57
147.	314	Sadeel Khan	Barkat Khan	Bannu	5-7	33x34 1/2	Passed	52	5	57
148.	315	Raja Zahid Hussain	Raja Salabat Khan	Hari Pur	5-8 1/2	34x35	Passed	53	4	57

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145.	315	Sifat Ullah	Mir Saddy Khan	Lakki	5-11 ½	35 ½ X37	Passed	53	4	57
146.	316	Arshid Khan	Habib ur Rahman	Bannu	5-7	33x34 ½	Passed	52	5	57
149.	317	Haji Nawab	Shahi Nawab	Shangla	5-10	33x34 ½	Passed	52	5	57
150.	318	Nadeem	Muhammad Gul	Malakand	5-7 ½	35 ½ X37	Passed	52	5	57
151.	319	Abdullah Shah	Hamayyun Khan	Dir Lower	5-9	33x34 ½	Passed	52	5	57
152.	320	Aqal Badshah	Tajmin Khan	Shangla	5-8 ¼	36x37 ½	Passed	52	4	56
153.	321	Usman Ali	Noorhani Gul	Shangla	5-7 ½	34x36	Passed	52	4	56
154.	322	Khalid Khan	Mir Shah Jehan	Bannu	5-7	33x34 ½	Passed	53	3	56
155.	323	Mehran Khan	Fazal Amin	Swabi	5-11	33x34 ½	Passed	52	4	56
156.	324	Zahoor Khan	Sultan Muhammad	Swabi	5-7	33X35	Passed	52	4	56
157.	325	Abdullah	Abdul Wadood	Swabi	5-9	34X36	Passed	52	4	56
158.	326	Shakir Ullah	Kamin Gul	Nowshera	5-7	33x35	Passed	53	3	56
159.	327	Hussain Ahmad	Zar Muhammad	Nowshera	5-10	33x35	Passed	53	3	56
160.	328	Daud Khan	Akhtar Gulab	Malakand	5-8	33x35	Passed	53	3	56
161.	329	Muhammad Zakria	Ghulam Qadir	Swabi	5-8	33x35	Passed	53	3	56
162.	330	Shahir	Muhammad Israr	Swabi	5-10	34x36	Passed	53	3	56
163.	331	Muhammad Job Ullah	Badi Uzaman	Nowshera	5-7	34x35	Passed	53	3	56
164.	332	Imtiaz Ahmad	Muhammad Israr	Nowshera	5-7	33x35	Passed	53	3	56
165.	333	Liaqat Ali	Zarghun Shah	Mardan	5-7 ½	33x34 ½	Passed	53	3	56
166.	334	Izhar Zada	Sher Zada	Nowshera	5-8	35x37	Passed	53	3	56
167.	335	Najeeb Ullah	Ihsan Uddin	Charsadda	5-8	33x36	Passed	53	3	56
168.	336	Sajid Khan	Mir Rahman	Nowshera	5-9	35x35	Passed	53	3	56
169.	337	Ayaz Ullah	Fazal Nawab	Nowshera	5-9	33x34 ½	Passed	53	3	56
170.	338	Ahmad Jan	Wilayat Khan	Peshawar	5-8	33x34 ½	Passed	53	3	56
171.	339	Saddam Hussain	Taj Muhammad	Charsadda	5-8	33x35	Passed	53	3	56
172.	340	Sana Ullah	Norouz Khan	Lakki	5-9	33x34 ½	Passed	53	3	56
173.	341	Ihsan Ullah	Nasir Khan	Nowshera	5-8	33x35	Passed	53	3	56
174.	342	Nawab Khan	Abdur Rasheed	Nowshera	5-9	39x41	Passed	53	3	56
175.	343	Murad Khan	Shah Khel Khan	Nowshera	5-10	33x35	Passed	53	3	56
176.	344	Muhammad Ishag	Janat Gul	Nowshera	5-8	33x36	Passed	53	3	56
177.	345	Shafiq Ahmad	Gul Ihtiar	Charsadda	5-9	34x35	Passed	53	3	56
178.	346	Adil Khan	Bahram Khan	Charsadda	5-11	33x35	Passed	53	3	56
179.	347	Habib ur Rahman	Zar Muhammad	Nowshera	5-8	34x36	Passed	53	3	56
180.	348	Shahid Ali	Sir Zamin Khan	Nowshera	5-8	38x40	Passed	53	3	56
181.	349	Muhammad Irfan	Badshah Mir	Mardan	5-7	33x35	Passed	53	3	56
182.	350	Faqeer Ullah	Muhammad Shafi	Bannu	5-11	33x35	Passed	53	3	56
183.	351	Khursheed Afzal	Mir Afzal Shah	Bannu	5-9	34x36	Passed	53	3	56

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184.	352	Mehran Alam	Aziz Ullah	Swabi	5-9	34x36	Passed	53	3	56
185.	353	shah Asad	Afsar Jan	Nowshera	5-8	32x34	Passed	53	3	56
186.	354	Tuseef Bacha	Khyal Bacha	Nowshera	5-8	34x36	Passed	53	3	56
187.	355	Hazrat Umar	Abdul Ahad	Mardan	5-11	36x37	Passed	53	3	56
188.	356	Airaz Ali	Said Khan	Nowshera	5-10	34x36	Passed	53	3	56
189.	357	Muhammad Waqas	Muhammad Shafiq	Nowshera	5-7	33x35	Passed	53	3	56
190.	358	Hamid Shah	Zawar Shah	Hari Pur	5-10	33x35	Passed	53	3	56
191.	359	Saeed ur Rahman	Said ur Rahman	Mardan	5-7	33x35	Passed	52	4	56
192.	360	Mathi Ullah	Abdul Manan	DIKhan	5-11	35x37	Passed	52	4	56
193.	361	Mukhtiar Ahmad	Nisar Ahmad	Mardan	5-8	33x35	Passed	52	4	56
194.	362	Sajid Hayat	Umar Hayat	Nowshera	5-9	39x41	Passed	52	4	56
195.	363	Naimat Ullah	Gul Taj	Nowshera	5-7	33x35	Passed	52	4	56
196.	364	Muhammad Izaz	Ilyas Khan	Hari Pur	5-8	33x34½	Passed	52	4	56
197.	365	Anwar Kamal	Najeeb Shah	Bannu	5-10	34x36	Passed	52	4	56
198.	366	Ubaid ur Rahman	Pashmeen Khan	Nowshera	5-9	35x37	Passed	52	4	56
199.	367	Noor Zada	Noor Afzal	Nowshera	5-10	33x35	Passed	52	4	56
200.	368	Bilal Khan	Sher Zaman	Nowshera	5-7½	38x40	Passed	52	4	56
201.	369	Aurangzeb	Ghumber Shah	Mardan	5-8	34x36	Passed	52	4	56
202.	370	Muhammad Shafiq	Umar Din	Nowshera	5-9	36x38	Passed	52	4	56
203.	371	Kifayat Ullah	Fazle Rabi	Nowshera	5-7	34x35½	Passed	52	4	56
204.	372	Naseer Khan	Shaz Khan	Nowshera	5-8	34x35	Passed	52	4	56
205.	373	Adil Khan	Chinar Gul	Nowshera	5-8	34x35	Passed	52	4	56
206.	374	Ghulam Ullah	Zar Dali	Bannu	5-8	33x35	Passed	52	4	56
207.	375	Wisal Bacha	Muhammad Ibrahim	Charsadda	5-8	34x36	Passed	52	4	56
208.	376	Bahadar Salim	Salim Khan	Nowshera	5-8	33x35	Passed	52	4	56
209.	377	Gharib Shah	Zaiwar Shah	Charsadda	5-9	35x37	Passed	52	4	56
210.	378	Nisar Khan	Hazrat Ali	Malakand	5-7½	38x40	Passed	52	4	56
211.	379	Tuseef ur Rahman	Pazeer ur Rahman	Nowshera	5-11	33x34½	Passed	52	4	56
212.	380	Habib Noor	Muhammad Aslam	Nowshera	5-9	34x36	Passed	52	4	56
213.	381	Abdul Ghaffar	Ajmal Khan	Nowshera	5-9	36x38	Passed	52	4	56
214.	382	Sher Alam	Zahir Muhammad	Nowshera	5-7	33x35	Passed	52	4	56
215.	383	Zeeshan Khan	Zain Khan	Nowshera	5-7	33x34½	Passed	52	4	56
216.	384	Shahriyar	Jan Muhammad	Nowshera	5-8	33x35	Passed	52	4	56
217.	385	Naseem Ullah	Feroz Khan	Nowshera	5-8	33x36	Passed	52	4	56
218.	386	Raza Gul	Muhammad Riaz	Nowshera	5-8	33x34½	Passed	52	4	56
219.	387	Younas Khan	Mumtaz	Peshawar	5-8	35x37	Passed	52	4	56
220.	388	Arif Hayat	Hizar Hayat	Nowshera	5-8	33x35	Passed	52	4	56

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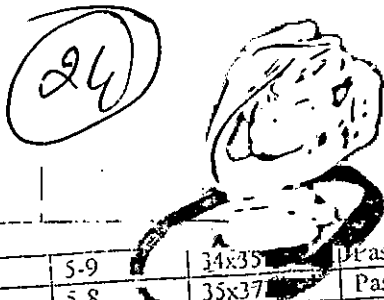
		Ibrahim	Muhammad Rasan	Nowshera	5-7	33x34½	Passed	52	4	56
		Zeesahn Safdar	Safdar Shah	Hari Pur	5-9	34x36	Passed	52	4	56
222.	390	Zahir Ali	Muzafar Khan	Nowshera	5-8	33x34½	Passed	52	4	56
223.	391	Junaid Saced	Said ur Rahman	Nowshera	5-7	33x34½	Passed	52	4	56
224.	392	Kamran Khan	Hayat Khan	Nowshera	5-7 ½	36x40	Passed	52	4	56
225.	393	Imran	Azmat	Charsadda	5-8½	33x35	Passed	52	4	56
226.	394	Nisar Ahmad	Sher Zar Khan	Nowshera	6-0	34x36	Passed	52	4	56
227.	395	Kaleem Ullah	Sabih Ullah	Nowshera	5-10	33x35	Passed	52	4	56
228.	396	Gul Rahman	Abdur Rahman	DIKhan	5-8	33x35	Passed	52	4	56
229.	397	Jan Alam	Fazle Qadeem	Nowshera	5-8	33x36	Passed	52	4	56
230.	398	Muhammad Junaid	Zulgarnain	Nowshera	5-7 ½	33x34½	Passed	51	5	56
231.	399	Muhammad Tair Khan	Jan Bahadar	Lakki	6-0	34x36	Passed	51	5	56
232.	400	Zahid	Ameer Hussain	Nowshera	5-7	33x35	Passed	51	5	56
233.	401	Shahzad Nabi	Abdul Qayyum	Nowshera	5-7	35x37	Passed	51	5	56
234.	402	Asif Raza	Missal Khan	Peshawar	5-8	34x35	Passed	51	5	56
235.	403	Hayat Ullah	Ali Sher	Nowshera	5-7 ½	36x40	Passed	51	5	56
236.	404	Falak Zeb	Shah	Nowshera	5-8	33x35	Passed	52	3	55
237.	405	Rawail Khan	Jamroz Khan	Charsadda	5-9	34x36	Passed	52	3	55
238.	406	Muhammad Istiaq	Mir Muhammad	Swabi	5-8	34x36	Passed	52	3	55
239.	407	Rehmat Khan	Khyal Mar Khan	Peshawar	5-8	33x34 ½	Passed	52	3	55
240.	408	Anwar Muhammad	Dost Muhammad	Nowshera	5-7	33x35	Passed	52	3	55
241.	409	Khalid Shah	Gharib Shah	Hari Pur	5-7	33x35	Passed	52	3	55
242.	410	Adil Khan	Abdul Qadir	Peshawar	5-7	33x35	Passed	52	3	55
243.	411	Muhammad Ibrahim	Hidayat Khan	Nowshera	6-0	34x36	Passed	52	3	55
244.	412	Wasim Ullah	Amin Ullah	Mardan	5-9	34x36	Passed	52	3	55
245.	413	Sami Ullah	Nasrullah	Nowshera	5-7 ½	33x35½	Passed	52	3	55
246.	414	Irfan Ullah	Shamas Khan	Nowshera	5-10	33x35	Passed	52	3	55
247.	415	Naveed Ali	Abdur Rahim	Malakand	5-10	33x35	Passed	52	3	55
248.	416	Junaid Khan	Zafar Khan	Peshawar	5-8	34x35	Passed	52	3	55
249.	417	Wali Ullah Khan	Aman Ullah Khan	Nowshera	5-8	33x35	Passed	52	3	55
250.	418	Bakht ali	Janan	Nowshera	5-7	33x35	Passed	52	3	55
251.	419	Bacha Khan	Munir Darast Khan	Bunir	5-8	34x36	Passed	52	3	55
252.	420	Fazal Zaman	Naheed Zaman	Nowshera	5-7	33x34½	Passed	52	3	55
253.	421	Nadeem Jan	Muhammad Qayyum	Charsadda	5-11	33x34½	Passed	52	3	55
254.	422	Adil Khan	Nawab Shah	Charsadda	5-7	33x35	Passed	52	3	55
255.	423	Subhan Ullah	Muzafar Khan	Charsadda	5-7	33x35	Passed	52	3	55
256.	424	Nadeem Zafar	Safdar Ali	DIKhan	5-9	34x36	Passed	52	3	55
257.	425									

Adil

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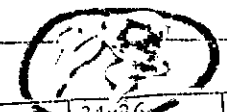
		Muhammad Jamil	Muhammad Khan	Hari Pur	5-7	33x35	Passed	52	3	55
		Shah Faisal	Noor Bahdar	Peshawar	5-11	33x34 1/2	Passed	52	3	55
		Wajid Ali	Basher Gul	Nowshera	5-8	34x36	Passed	52	3	55
259.	427	Imdad Ullah	Afzal Khan	Nowshera	5-9	34x36	Passed	52	3	55
260.	428	Ayaz Khan	Riaz Khan	Charsadda	5-10	34x36	Passed	52	3	55
261.	429	Ikram Ullah	Fazal Nabi	Peshawar	5-9	33x35	Passed	52	3	55
262.	430	Izaz Ali	Kifayat Ullah	MKD	5-7 1/2	33x34 1/2	Passed	52	3	55
263.	431	Haji Rahman	Haji Gul	Nowshera	5-9	38x40	Passed	52	3	55
264.	432	Abdul Basit	Dana Khan	Chitral	5-8	33x34 1/2	Passed	52	3	55
265.	433	Inayat Ullah	Tehsin Ullah	Nowshera	5-8	34x36	Passed	52	3	55
266.	434	Zakria	Gul Pazer	Nowshera	5-7	33x35	Passed	52	3	55
267.	435	Wajid Ullah	Aman Ullah	Peshawar	5-9	35x37	Passed	52	3	55
268.	436	Ali Ahmar	Taj Uddin	Nowshera	5-7 1/2	35x37	Passed	52	3	55
269.	437	Shah Fahad	Nusrat Umar	Nowshera	5-10	38x40	Passed	52	3	55
270.	438	Niaz Mir Khan	Mamraiz Khan	Nowshera	5-9	34x35	Passed	52	3	55
271.	439	Nabi Amin	Lawang Khan	Nowshera	5-11	33x34 1/2	Passed	52	3	55
272.	440	Amran Khan	Muhammad Sadiq	Bannu	5-10	34x36	Passed	52	3	55
273.	441	Mubashir	Wali Raiunan	Nowshera	5-7	35x38	Passed	52	3	55
274.	442	Najeeb Ullah	Noord Ali Khan	Nowshera	5-8	34x36	Passed	52	3	55
275.	443	Muhammad Sohail	Sardar Khan	Nowshera	5-7	33x34 1/2	Passed	52	3	55
276.	444	Arif Khan	Asmat Ullah	Peshawar	5-8	34x36	Passed	52	3	55
277.	445	Muhammad Farooq	Amin Ullah	Nowshera	5-9 1/2	33x35 1/2	Passed	51	4	55
278.	446	Jamil Gul	Bakhtiar Gul	Nowshera	5-7 1/2	33x35	Passed	51	4	55
279.	447	Inayat Ali Shah	Naimat Shah	Nowshera	5-7	34x36	Passed	51	4	55
280.	448	Ahmad Babar	Munir Ahmad	Nowshera	5-9	34x35	Passed	51	4	55
281.	449	Shah Zeb	Maseqam Khan	Nowshera	5-7	34x36	Passed	51	4	55
282.	450	Ayat Ullah	Mallok Shah	Nowshera	5-9	39x41	Passed	51	4	55
283.	451	Muhammad Salnan	Himayat Ullah	Nowshera	5-9	34x36	Passed	51	4	55
284.	452	Atta Ullah	Mukaram Khan	Nowshera	5-7 1/2	34x35 1/2	Passed	51	4	55
285.	453	Shafi Ullah	Amin Said	Nowshera	5-8	34x36	Passed	51	4	55
286.	454	Zareed Gul	Yad Gul	Nowshera	5-7	34x35	Passed	51	4	55
287.	455	Muhammad Tuqeer	Sakhi Jan	DIKhan	5-7	34x35	Passed	51	4	55
288.	456	Gul Nabi	Ghulam Murtaza	Nowshera	5-7 1/2	34x36	Passed	51	4	55
289.	457	Monees Khan	Qadeem Khan	Nowshera	5-7	33x35	Passed	51	4	55
290.	458	Ali Raza	Asghar Khan	Nowshera	5-9	34x36	Passed	51	4	55
291.	459	Waqas Ahmad	Inwan Uddin	Mardan	5-11 1/2	33x34 1/2	Passed	51	4	55
292.	460	Daud Khan	Karam Khan	Mardan	5-7 1/2	38x40	Passed	51	4	55
293.	461									
294.	462									



						34x35	Passed	51	4	55
		Multan Khan	Charsadda	5-9						
		Essa Khan	DIKhan	5-8		35x37	Passed	51	4	55
		Najeeb Ullah	Malakand	5-9 1/2		35x36 1/2	Passed	51	4	55
296.	464	Saif ur Rahman	Lal Nawab	5-7		33x35	Passed	51	4	55
297.	465	Zafar Iqbal.	Muhaminad Ali	5-8		33x35	Passed	51	4	55
298.	466	Abdul Ali	Inayat Khan	5-7		33x35	Passed	51	4	55
299.	467	Ali Sohail	Mir Faraz	5-8		34x36	Passed	51	4	55
300.	468	Irfan Ullah	Habib Nawaz	5-8		35x37	Passed	51	4	55
301.	469	Hazrat Ali	Muhammad Riaz	5-9		34x36	Passed	51	4	55
302.	470	Muhammad Shah Faisal	Muhammad Azam	6-0		38x40	Passed	51	4	55
303.	471	Haroon ur Rashed	Masrab Gul	5-7		38x40	Passed	51	3	54
304.	472	Tahir ali	Sajid Ali	5-9		34x36	Passed	51	3	54
305.	473	Rehmat Ali	Muhammad Amin	5-8		33x34 1/2	Passed	51	3	54
306.	474	Salman	Amir Shah	5-9		39x41	Passed	51	3	54
307.	475	Atta Ullah Shah	Farooq Siyar	5-8		34x36	Passed	51	3	54
308.	476	Abdullah	Munawar Khan	5-9		34x36	Passed	51	3	54
309.	477	Nafid Ullah	Zari Dad	5-7		33x35	Passed	51	3	54
310.	478	Asif Karim	Mir Relunan	5-10 1/2		36x38	Passed	51	3	54
311.	479	Mujahid Khan	Muhammad Zaman	5-8		33x36	Passed	51	3	54
312.	480	Zeeshan	Abdul Latif	5-8		34x36	Passed	51	3	54
313.	481	Muhammad Saced	Saif ur Rahman	5-7 1/2		36x40	Passed	51	3	54
314.	482	Zia ur Rahman	Muhammad Nawaz	5-7 1/2		36x40	Passed	51	3	54
315.	483	Farooq Nawaz	Sher Khan	5-8		33x34 1/2	Passed	51	3	54
316.	484	Tajdar	Inayat Khan	5-7		33x35	Passed	51	3	54
317.	485	Shah Fahad	Wali Khan	5-7 1/2		38x40	Passed	51	3	54
318.	486	Junaid Khan	Yar. Muhammad	5-10		34x36	Passed	50	4	54
319.	487	Sohail Khan	Fareed Khan	5-8 1/2		34x36	Passed	50	4	54
320.	488	Amanat Khan	Sharif Ali	5-11 1/2		35x36	Passed	50	4	54
321.	489	Nawab Ali	Abdul Qadcer	5-8		33x34 1/2	Passed	50	4	54
322.	490	Kamran Ullah	Ameer Dad	5-7		34x35	Passed	50	4	54
323.	491	Asad	Muhamunad Zahir	5-8		33x35	Passed	50	4	54
324.	492	Muhammad Faiq	Nasrullah	5-7		33x35	Passed	50	4	54
325.	493	Muhammad Amjad	Itibar Shah	5-8		33x34 1/2	Passed	50	4	54
326.	494	Saif Ullah	Siraj Gul	5-8		33x34 1/2	Passed	50	4	54
327.	495	Jawad Khan	Ziarat Gul	5-9		35x37	Passed	50	4	54
328.	496	Zawar Ali	Abdul Rauf	5-8		34x36	Passed	50	4	54
329.	497	Nageeb Ullah	Rozi Shah	6-0		34x36	Passed	50	4	54
330.	498	Anwar Zada	Wali Khan							
331.	499	Idalat Khan								

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332.	500	Asad Ullah	Ghufran Ullah	Nowshera	5-9	34x36	Passed	50	4	54
333.	501	Shoukat Khan	Mumtaz Khan	Nowshera	5-10	34x36	Passed	50	4	54
334.	502	Ijaz Ullah	Zufran Gul	Nowshera	5-11	33x34½	Passed	50	4	54
335.	503	Muhammad Haroon	Aslam Khan	Nowshera	5-7	35x37	Passed	50	4	54
336.	504	Shafi Muhammad	Khyai Muhammad	Nowshera	5-8	33x35	Passed	50	4	54
337.	505	Nisar Khan	Aslam Khan	Peshawar	5-9	35x37	Passed	50	4	54
338.	506	Muhammad Ijaz	Rohan Zeb	Charsadda	5-11½	35x36	Passed	50	4	54
339.	507	Fawad ul Haq	Faiz Ullah Khan	Bannu	5-7	33x35	Passed	49	4	53
340.	508	Muhammad Shoaib	Muhammad Din	Nowshera	5-8 ½	33x35	Passed	49	4	53
341.	509	Said Rahim Shah	Said Ibrahim Shah	Chitral	5-11½	36x38	Passed	49	4	53
342.	510	Sana Ullah	Fazal Amin	Nowshera	5-8	33x34½	Passed	49	4	53
343.	511	Adnan	Shanis ul-Qamar	Nowshera	5-7	34x35	Passed	49	4	53
344.	512	Zakir	Abdur Rashid	Nowshera	5-9 ½	34x36	Passed	49	4	53
345.	513	Mubashir Ahmad	Shah Jehan	Swabi	5-8 ½	36x38	Passed	49	4	53
346.	514	Sohail Ahmad Shah	Rehman Shah	Nowshera	5-7	34x36	Passed	49	4	53
347.	515	Ghafoor	Abdul Jabbar	Charsadda	5-9 ½	36x38	Passed	49	4	53
348.	516	Shakir Ullah	Yousaf Khan	Nowshera	5-7	33x34½	Passed	49	4	53
349.	517	Shahin Shah Durani	Muhammad Saeed	Nowshera	5-9 ½	33x35	Passed	49	4	53
350.	518	Nasir Ayub	Hidayat Ullah	Swabi	5-7 ½	33x34½	Passed	49	4	53
351.	519	Zakir Muhammad	Raz Muhammad	Nowshera	5-8	33x34½	Passed	49	4	53
352.	520	Masaud Shah	Yousaf Khan	Mardan	5-8 ½	34x35½	Passed	49	4	53
353.	521	Naveed Khan	Basher Khan	Peshawar	5-7 ½	34x36	Passed	49	4	53
354.	522	Miraj Khan	Gul Haider Khan	Mardan	5-7 ½	38x40	Passed	49	4	53
355.	523	Atif	Abdur Rashed	Nowshera	5-9	34x35	Passed	49	4	53
356.	524	Shahab Ali	Niaz Ali	Charsadda	5-7	33x34½	Passed	49	4	53
357.	525	Muhammad Ali	Muhammad Saleem	Swabi	5-7 ½	33x34½	Passed	49	4	53
358.	526	Tahir Jan	Shah Qiaz Khan	Swabi	5-8 ½	33x34½	Passed	49	4	53
359.	527	Alamzeb	Aurangzeb	Bannu	5-7 ½	33x34½	Passed	49	4	53
360.	528	Sher Ali	Ali Bahadar	Nowshera	5-7 ½	34x36	Passed	49	4	53
361.	529	Rameez Ahmad	Riaz Ahmad	Shangla	5-8	33x35	Passed	49	4	53
362.	530	Suliman Khalid	Bakht Rahim	Charsadda	5-9 ½	35x37	Passed	49	4	53
363.	531	Mukaram Shah	Mian Noor Shah	Shangla	5-7 ½	33x34½	Passed	49	4	53
364.	532	Ishaq	Faqir Hussain	Charsadda	5-8	35x37	Passed	49	4	53
365.	533	Khalid Khan	Naqash Dad	Peshawar	5-9 ½	33x34½	Passed	49	4	53
366.	534	Said Adil Shah	Zafar Ali Shah	Mardan	5-7	34x36	Passed	49	4	53
367.	535	Jawad Ali	Haider Ali	Charsadda	5-7 ½	33x34½	Passed	49	4	53
368.	536	Waqar Khan	Dilawar Jan	Charsadda	5-9 ½	33x34½	Passed	49	4	53

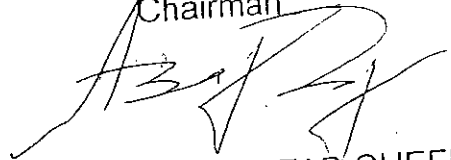
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370.	537	Muhammad Zia	Alamzeb Khan	Malakand	5-7	33x34½	Passed	49	4	53
	538	Wilayat Shah	Muhabat Shah	Charsadda	5-7 ¼	33x35½	Passed	49	4	53
371.	539	Muhammad Amir	Muhammad Younas	Charsadda	5-7 ½	36x37½	Passed	49	4	53
372.	540	Saif Ullah	Hazrat Ullah	Charsadda	5-9 ½	35x36	Passed	49	4	53
373.	541	Muhammad Ijaz	Jan Muhammad	Nowshera	5-7	33x34½	Passed	49	4	53
374.	542	Aqib Javed	Rahim Khan	Peshawar	5-7	33x34½	Passed	49	4	53
375.	543	Adil Muhammad	Dawar Muhammad	Swabi	5-7 ¼	34x36	Passed	49	4	53
376.	544	Mian Mustafa Jamal	Wahid Jamal	Swabi	5-10¼	35x38	Passed	49	4	53
377.	545	Shakeel Ahmad	Zahir Ullah Khan	Nowshera	5-7	34x36	Passed	49	4	53
378.	546	Salman Khan	Irshad Khan	Mardan	5-11½	33x34½	Passed	49	4	53
379.	547	Mihad Ullah	Mughal Khan	Charsadda	5-7 ½	34x36	Passed	49	4	53
380.	548	Yasin	Fazal Rabi	Nowshera	5-7 ¼	33x35½	Passed	49	4	53

Chairman



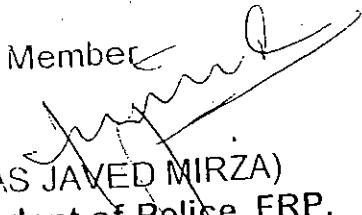
(MUHAMMAD ASIF ZAFAR CHEEMA)
Deputy Inspector General of Police,
(Inv/HQrs), CPO,
Khyber Pakhtunkhwa, Peshawar

Member



(YOUNAS JAVED MIRZA)
Acting Deputy Commandant
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar

Member



(YOUNAS JAVED MIRZA)
Superintendent of Police, FRP,
Peshawar Range, Peshawar



793
29-8-14



ANNEX - E



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

27

ORDER.

Departmental Enquiry into the allegations of Corruption in FRP recruitment during August 2013, was conducted through a committee constituted vide this office order No. 1357-61/PPO, dated 14.02.2014 against the officials of FRP.

Regional Police Officer Mardan chairman of the committee submitted the Enquiry report vide his office Memo: No. 2126/PA, dated 13.08.2014, upon which the W/IGP Khyber Pakhtunkhwa Peshawar recorded the following remarks:-

"Please proceed accordingly and produce the Departmental proceeding by 20.03.2014".

The Enquiry Committee in his report recommended ASI Zar Khan for exoneration and stated that ASI Muhammad Ibrar was posted as OASI FRP at that time when the recruitment in FRP was made.

ASI Muhammad Ibrar the then OASI FRP is hereby place under suspension and also closed to CPO Peshawar for Departmental proceeding.

A committee of the following Officers is constituted to hold a proper Departmental Enquiry in to the allegations and to submit the report within Week.

- a. DIG Muhammad Saeed, RPO/Mardan Region-I, Mardan.
- b. SSP Muhammad Ali DPO/Abbottabad.

EC:

(Handwritten signature)

(MUBARAK ZEB) PSP
DIG/HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

(Handwritten signature)
Addl IGP/Commandant
28/08/2014

No. 1674-78/E-III. Dated Peshawar, the 25/8/2014.

- 1. Copy of above is forwarded to the Addl: IGP/HQrs: Khyber Pakhtunkhwa Peshawar.
- 2. Copy of above is forwarded to the SP/IGP PR for information and to Addl: IGP/Commandant FRP Khyber Pakhtunkhwa Peshawar.
- 3. Regional Police Officer Mardan Region Mardan. Duplicate copy of Charge Sheet/statement of Allegations are enclosed for delivery upon the defaulter ASI. His signature may be obtained on duplicate copy and returned to this office.
- 4. District Police Officer Abbottabad.
- 5. IJG/Establishment CPO Peshawar.

(Handwritten signature)
28/08/2014
For Addl: IGP/Comdant
29-8-2014

(Handwritten signature)
Ri/Actt/SRC/OAS
For 2/19

✓ ANSWER:- F

CHARGE SHEET

(28)

I, Mubarak Zeb, Deputy Inspector General of Police, Headquarter, Khyber Pakhtunkhwa, Peshawar as Competent Authority, hereby charge you ASI Muhammad Ibrar the then OASI FRP as follows:-

- a. That you in connivance with your officer facilitated the illegal process of recruitment of 378 candidates in FRP recruitment 2013,
- b. That you also assisted in recruitment of 169 candidates recruited by un-notified committee and,
- c. That with your ulterior motive also processed transfer of 37 Constables to FRP/Kohat for allotment of Constabulary Numbers.

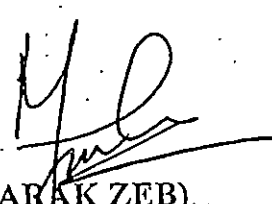
By reason of the above, you appear to be guilty of misconduct under the Khyber Pakhtunkhwa Police Rules 1975 amended in 2014 Para 6 (b) and have rendered yourself liable to all or any of the penalties specified in the said Rules.

You are therefore, directed to submit your written defense within seven (07) days of the receipt of this Charge Sheet to the Enquiry Officer/Committee.

Your written defense, if any, should reaches the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

You are directed to intimate whether you desire to be heard in person or otherwise.

A statement of allegation is enclosed.


(MUBARAK ZEB)
DIG/HQrs:
For Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar. 17/12

(29)

DISCIPLINARY ACTION

I, Mubarak Zeb, Deputy Inspector General of Police, Headquarters Khyber Pakhtunkhwa Peshawar being Competent Authority, am of the opinion that ASI Muhammad Ibrar the then OASI FRP, have rendered himself liable to be proceeded against, as he has committed the following acts of omissions/commissions within the meaning of the Khyber Pakhtunkhwa Police Rules 1975 amended in 2014 Para 6 (b) Sub Para v.

STATEMENT OF ALLEGATIONS

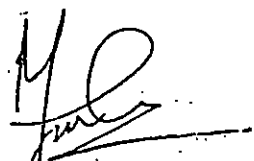
- a. That he in connivance with your officer facilitated the illegal process of recruitment of 378 candidates in FRP recruitment 2013,
- b. That he also assisted in recruitment of 169 candidates recruited by un-notified committee and,
- c. That with your ulterior motive also processed transfer of 37 Constables to FRP/Kohat for allotment of Constabulary Numbers.

The said act of negligence depicts height of inefficiency, disobedience, indiscipline attitude and lack of professionalism which amounts to grave misconduct on his part warranting stern disciplinary action against him.

For the purpose of scrutinizing the conduct of the said officer with reference to the above allegations, as Inquiry Officer/Committee consisting of the following Officer (s) of Khyber Pakhtunkhwa Police Rules 1975, amended in 2014 Para 6 (b) Sub Para v.

- i. MR. MUHAMMAD SAIED - RPO Mardan
- ii. MR. MUHAMMAD ALI KHAN - DPO Abbottabad

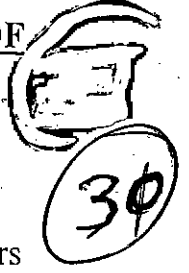
The Inquiry Committee/officer (s) shall, in accordance with the provision of the said Rules, provide reasonable opportunity of hearing to the accused officer, record and submit its finding within 10 days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused officer.


(MUBARAK ZEB)
DIG/HQrs;
For Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.

17/11

Subject: REPLY TO THE CHARGE SHEET AND SUMMARY OF ALLEGATION SERVED UPON ME.

ANNEX:- G



R/Sir,

In response to the Charge Sheet issued by DIG Headquarters for Provincial Police Officer Khyber Pakhtunkhwa, Peshawar and delivered to me with the following allegations:-

1. That you in connivance with your officer facilitated the illegal process of recruitment of 378 candidates in FRP Recruitment 2013.
2. That you also assisted in recruitment of 169 candidates recruited by un-notified committee.
3. That with your ulterior motive also processed transfer of 37 Constables to FRP Kohat for allotment of Constabulary Numbers.

R/Sir,

I was served as OSI FRP Hqrs: during the recruitment 2013 in FRP. My duties in recruitment was just to collect applications with documentary record from the candidates and make a list for high-ups i.e. Recruitment Selection Committee. After the singed merit orders by the Recruitment Selection Committee I make Enlistment Orders for selected candidates which were nominated by the Recruitment Selection Committee. When all the formalities done well and Deputy Commandant signed the enlistment orders I sent them for further process. I served my duties with justice, fairly and in accordance with law and all the charges leveled against me are totally baseless.

Parawise reply is as under:-

1. The Charge is denied incorrect. I did not facilitate anyone in the recruitment of candidates. The recruitment of 378 candidates without adopting procedure and schedule is totally incorrect and baseless. The

27/10/2014

recruitment of all these 378 constables were made transparently after observing all codal formalities by the Recruitment Selection Committee.

2. The second Charge pertaining to 169 candidates recruited by un-notified committee for the FRP hqrs: with my connivance is baseless and self contradictory as it made clear that recruitment was made by a Recruitment Selection Committee but the burden put on me and I have no link with the recruitment process instead of above explain duties.

3. I have also charge sheeted for transferring 37 constables without number to FRP Kohat where they allotted constabulary numbers is also incorrect and denied. When the High-ups singed and dispatched the Orders then my duties was just to received these orders for OB and sent the copies to concerned for further necessary action.

R/Sir.

My these duties is no violation of rules, my fault is that I obey the written orders of the high-ups. However I have the rights to cross examine complainants, witnesses during the enquiry and hope that I will be given the chance of personal hearing and may very kindly be exonerated of the charges being baseless and unfounded.

(Muhammad Ibrar)
Sub Inspector
Ex-OSI FRP Hqrs:

27/10/2014

Received.

7/11/14
PA

27/10/14

ANNEX H

CONFIDENTIAL

Report of the Inquiry Committee

1. Introduction

An Inquiry Committee was constituted by the Provincial Police Officer Khyber Pakhtunkhwa vide his Order No. 763-69/SE-I dated 09-04-2014 read with Order no. 1062-68 dated 16/4/2014 to investigate into allegations of corruption in FRP recruitment. The committee submitted its Detailed Inquiry report vide **DIG Mardan letter No. 2119/PA, dated 11.08.2014** wherein it recommended to exonerate ASI Zar Khan who was posted as OSI in December 2013 and recommended disciplinary action against ASI Muhammad Ibrar, hence this instant inquiry.

2. Background

The Provincial Police Officer, Khyber Pakhtunkhwa received numerous complaints about allegations of corruption and irregularity in the recruitment process of constables in Frontier Reserve Police. A fact finding inquiry committee was constituted comprising of Additional Inspector General (Investigations) and Regional Police Officer, Kohat that submitted its recommendations on 2nd April 2014 wherein it recommended action against the following officers:


1. Mr. Younas Javed (Former Deputy Commandant FRP)
2. Shakil Ahmad (Former R.I, FRP HQrs)
3. Zar Khan ASI (Former OS.I FRP)
4. Amin Khan S.I (Reader to Deputy Commandant FRP)
5. Hashmat Ali Zaidi (Former SP FRP Kohat)
6. Noor Muhammad SI/PC (Former OSI FRP Kohat)

The fact finding inquiry committee also observed in their report the following observations:

- The advertisement published by AIG(E) was cancelled and another advertisement was published by Deputy Commandant for no obvious reason except that applications from candidates were invited in SP/FRP range instead of respective DPO offices.





- 
- No committee was constituted for recruitment in FRP HQs Peshawar.
 - Answer papers for candidates when requisitioned by fact finding inquiry were responded to as destroyed.

This inquiry report for officers mentioned at Sr: No. 01 to 06 has been sent to PPO Khyber Pakhtunkhwa vide **DIG Mardan letter No. 2119/PA, dated 11.08.2014.**

3. Constitution of Formal Inquiry Committee

The Inspector General desired that formal enquiry is conducted into the charges and thus this inquiry committee was tasked to probe into the Charges attributed to ASI Muhammad Ibrar during the recruitment process in FRP, KP.

4. Charges

This Inquiry committee was tasked to probe into the charge as below.


ASI Muhammad Ibrar (Former OSI FRP Peshawar)

"That you in connivance with your officer facilitated the illegal process of recruitment of 378 candidates; That you also assisted in recruitment of 169 candidates recruited by un-notified committee and That with your ulterior motive also transfer 37 constables to FRP/Kohat for allotment of Constabulary numbers"

Reply to above charges by ASI Muhammad Ibrar is in negative and he has stated that he has acted in judicious manner and as per orders of his seniors.

5. Inquiry Committee's observations on the whole case:

The general observations of the Committee that go to the heart of the entire case are in respect of the following two matters:

- 
- I. The Recruitment Committee of FRP HQs Peshawar was a ***Coram non judice*** as it carried out its proceedings without a Secretary and a single officer assumed the role of two Members which tantamount to defeat the very essence and cause for which recruitment committees were constituted i.e. ensuring transparency.
 - II. The recruitment was carried out by FRP HQs Peshawar in contravention to the Provincial Police Officer's Instructions circulated vide Order No. 19702-9/E-II dated 13 August 2013 i.e. "*Instructions for recruitment in Khyber Pakhtunkhwa Police*" thus the enlistment stated as Charges by Recruitment Committee is



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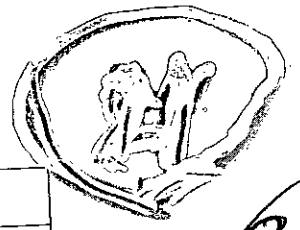
carried out in complete defiance of the said Instructions cannot be considered as authorized and legitimate.

6. Facts of the Case

1. Applications were invited for enrollment in FRP as per schedule:
 - Submission of applications in SP/FRP Range office: 23-31 July 2013.
 - Physical test: 15-16 August 2013
 - Written Test: 17 August 2013
 - Interview: 19-20 August 2013
2. The Recruitment committee for Peshawar comprising of DIG/Investigations, HQrs: as Chairman and Mr. Younas Javeed Mirza represented as member -I in the capacity of Deputy Commandant FRP, Peshawar and as member-II in the capacity of SP, FRP Peshawar Range, and carried out the proceedings **without a Secretary.**
3. Member of the above recruitment committee (Mr. Younas Javed) inordinately exceeding his mandated task and sent a letter Number 595/PA dated 20 August 2013 to the then PPO for entertaining applications of candidates falling outside the mandate of Peshawar recruitment committee, stating that 'many candidates of other districts were present for physical and written tests but being candidates of other districts, the selection committee was unable to enlist them'.
4. The above quoted letter produced on record reflects the directives of the then PPO as: **"Continue transparency, merit must be observed through committee"**. It is pertinent to mention that instant letter was sent to PPO on 20 August 2013 (the last date for interviews).
5. On the basis of above, the Recruitment Committee prepared two lists with 380 candidates and 168 candidates as 'Waiting list, Nominal roll of FRP Hqrs: Peshawar Candidates of Different Ranges'.
6. Following orders for enlistment of constables were made at dates mentioned against each.

Order Number	Dated	Serial Number corresponding to above lists.
414-45/OSI	30/8/2013	01-90

422-24/OSI	02/09/2013	91-168
508-10/OSI	18/9/2013	340-380
574-78 / OSI	27/9/2013	01 to 157
579-83/OSI	2/10/2013	158-257
613-17/OSI	28/10/2013	258-339



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7. Detailed assessment of the facts inquired.

- It is beyond understanding of this committee, as to how candidates ineligible on the basis of Domicile and not entitled to be examined at Peshawar were measured physically and tested in written exam.
- This committee also fails to comprehend the need for destruction of record including written papers where clear order in the form of "Instructions for recruitment in Khyber Pakhtunkhwa Police" issued by Provincial Police Officer's vide Order No. 19702-9/E-II dated 13 August 2013 states in para 2(c) 'written papers are to be preserved for a period of one year'. These instructions were circulated well in advance of recruitment process and when these instructions were in place, a need for destruction of papers would make things doubtful and dubious. After having seen the state of affairs on the basis of which proceedings started, and subsequent unavailability of record, nothing is left to be discussed as the above conduct of the then recruitment committee speaks for itself and needs no further deliberation. Therefore, by no stretch of imagination, it can be held that the process was a transparent one
- In response to confirmation about availability of the then PPO's approval as relied upon by Mr. Younas Javed, Registrar CPO vide his letter No. 3538/E-IV replied that original file/ record of the I.G's approval for appointment of constables of other districts and destruction of answer papers is not available on record.
- The Registrar CPO has stated that **no record found in respect of approval granted by the PPO**, which renders this recruitment as unauthorized and reply of Deputy Commandant is unsatisfactory and evasive.
- This inquiry committee formerly recorded statements of recruits and none of them mentioned about bribing any police officer in getting appointed through this

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recruitment process and remained tightlipped. During their cross questioning, the candidates gave shaky and inaccurate responses about the place where they were tested, duration of written paper and the office where they submitted their documents. This hints at the fact that they did not go through standard recruitment process and were appointed through back door channels. In instant case, irregularity and corruption seems obvious.

8. Conclusion

This inquiry committee is of the view that irregularity and deviation from established rules and principles during the recruitment process in question is established beyond shadow of doubt. ASI Muhammad Ibrar was the then OSI who acted in defiance of set rules and reportedly he was a central figure during the entire process. Having found guilty of malpractices, this inquiry committee recommends appropriate penalty admissible under the rules.

Certified that this Inquiry consists of seven (05) pages and each page bears initials of the undersigned members of Inquiry committee.

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ANNEX: I



FINAL SHOW CAUSE NOTICE

1. WHEREAS, you Muhammad Ibrar, Assistant Sub Inspector, while posted as OASI FRP HQrs: committed gross misconduct as defined in Khyber Pakhtunkhwa Police Rules 1975 amended in 2014 Para 6 (b), resultantly you were Charge Sheeted and served with the statement of allegations, Mr. Muhammad Saeed, RPO/Mardan and Mr. Muhammad Ali Khan, DPO/Abbottabad were appointed to conduct enquiry.

2. WHEREAS, the Enquiry Officers finalized the Enquiry proceedings, giving you full opportunities of defence i.e personal hearing as well as cross examination was recorded in your presence besides audience of relevant record. Consequent upon the completion of Enquiry proceeding, the Enquiry Officers held you guilty of the charges leveled against you as per Charge Sheet. A copy of the finding is enclosed.

3. AND WHEREAS, on going through the finding and recommendation of Inquiry Officers, the material placed on record and other connected papers including your defence before the said Enquiry Officers, I am satisfied that you have committed gross misconduct and are guilty of the charges leveled against you as per statement of allegations handed over to you on 21.10.2014 and signature as token of its receipt is placed on record, which stands proved and recommended to be awarded appropriate punishment under the said rules.

4. NOW THEREFORE, I. MUBARAK ZEB, Deputy Inspector General of Police, Headquarters, Khyber Pakhtunkhwa, Peshawar, as Competent Authority have tentatively decided to impose upon you, any one or more penalties including the penalty of "Dismissal from Service" under Khyber Pakhtunkhwa Police rules 1975 amended in 2014.

You are therefore, required to Show Cause within seven days of the receipt of this Notice, as to why the aforesaid penalty should not be imposed upon you, failing which it shall be presumed that you have no defence to offer and exparte action shall be taken against you. Meanwhile also intimate whether you desire to be heard in person or otherwise.

(MUBARAK ZEB)
DIG/HQrs:
For Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar

No 3/4293/14
dn 08.12.14

MUHAMMAD IBRAR,
Assistant Sub Inspector,
(the then OASI FRP HQrs:)

Subject: REPLY OF FINAL SHOW CAUSE SERVED UPON ME.

R/Sir,

In response to the first Charge Sheet issued by DIG Headquarters for Provincial Police Officer Khyber Pakhtunkhwa, Peshawar and delivered with the following allegations:-

1. That you in connivance with your officer facilitated the illegal process of recruitment of 378 candidates in FRP Recruitment 2013.
2. That you also assisted in recruitment of 169 candidates recruited by un-notified committee.
3. That with your ulterior motive also processed transfer of 37 Constables to FRP Kohat for allotment of Constabulary Numbers.

R/Sir,

I was served as OSI FRP Hqrs: during the recruitment 2013 in FRP. My duties in recruitment was just to collect applications with documentary record from the candidates and make a list for high-ups i.e. Recruitment Selection Committee. After the signed merit orders by the Recruitment Selection Committee I make Enlistment Orders for selected candidates which were nominated by the Recruitment Selection Committee. When all the formalities done well and Deputy Commandant signed the enlistment orders I sent them for further process. I served my duties with justice, fairly and in accordance with law and all the charges leveled against me are totally baseless.

My Parawise replies were as under:-

1. The Charge is denied incorrect. I did not facilitate anyone in the recruitment of candidates. The recruitment of 378 candidates without adopting procedure and schedule is totally incorrect and baseless. The

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*Received today
on 12/12/14*

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12/12

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recruitment of all these 378 constables were made transparently after observing all codal formalities by the Recruitment Selection Committee.

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2. The second Charge pertaining to 169 candidates recruited by un-notified committee for the FRP hqrs: with my connivance is baseless and self contradictory as it made clear that recruitment was made by a Recruitment Selection Committee but the burden put on me and I have no link with the recruitment process instead of above explain duties.

3. I have also charge sheeted for transferring 37 constables without number to FRP Kohat where they allotted constabulary numbers is also incorrect and denied. When the High-ups signed and dispatched the Orders then my duties was just to received these orders for OB and sent the copies to concerned for further necessary action.

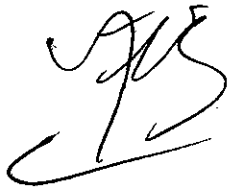
R/Sir.

First of all the enquiry officer i.e DIG Mardan neither give me any opportunity i.e to heard me, cross examined me in my defence. Moreover, I have claimed for irregularities and deviation from established rules and principal during the recruitment but sir my these duties is no violation of rules and I have neither deviation from rules and principal because my fault is just to obey the written orders of the high-ups. The enquiry conducted by the DIG Mardan is un-justice and one sided.

However I have the rights to cross examine complainants, witnesses during the enquiry and hope that I will be given the chance of personal hearing and may very kindly be exonerated of the charges being baseless and unfounded.



(Muhammad Ibrar)
Sub Inspector
Ex-OSI FRP Hqrs:





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

No. S/ 158-72 /15, Dated Peshawar the 09/01/2015

ORDER

This is an order on the departmental enquiry against Assistant-Sub-Inspector Muhammad Ibrar (now under suspension), while posted as OSI/FRP HQrs: Peshawar have made the following misconduct:-

- That he in connivance with his officer facilitated the illegal process of recruitment of 378 candidates in FRP recruitment 2013.
- That he also assisted in recruitment of 169 candidates recruited by un-notified committee and,
- That with his ulterior motive also processed transfer of 37 Constables to FRP/Kohat for allotment of Constabulary Numbers.

On the above allegations he was charge sheeted and a Final Show Cause Notice as defined in Khyber Pakhtunkhwa Police Rules 1975 amended in 2014 Para 6 (b) was issued. Reply to the Final Show Cause Notice was submitted by the defaulter officer was perused and found un-satisfactory. The inquiry committee is of the view that irregularity and deviation from established rules and principles during the recruitment process in question is established beyond shadow of doubt. ASI Muhammad Ibrar was the then OSI who acted in defiance of set rules and reportedly he was a central figure during the entire process. Having found guilty of malpractices, the inquiry committee recommends appropriate penalty admissible under the rules. He was found guilty and his involvements in FRP recruitment during August, 2013 against the officials of FRP proved against him. Furthermore I have also gone through the report of inquiry committee, who has very categorically mentioned about his involvement in the recruitment process. Retention of such like bad elements in the Police Force will definitely affect the moral of Khyber Pakhtunkhwa Police. He was also heard in person

In view of the above serious allegations I, Mubarak Zeb, Deputy Inspector General of Police, Headquarters, Khyber Pakhtunkhwa (Competent Authority), in agreement with the findings of the Enquiry Committee hold the officer guilty of misconduct as the charges have been proved against him, and under the Khyber Pakhtunkhwa Police rules 1975 vide Rules 5(5), I hereby impose major penalty of Compulsory Retirement on ASI Muhammad Ibrar (under suspension) from service with immediate effect.

Order announced.

(MUBARAK ZEB)

DIG/HQrs:

For Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar

Copy of the above is forwarded to the:

1. All Additional Inspectors General of Police Khyber Pakhtunkhwa.
2. The Capital City Police Officer, Peshawar.
3. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
4. The DIG/Headquarters Khyber Pakhtunkhwa.
5. AIG/Establishment CPO Peshawar.
6. PSO to IGP, CPO Peshawar.
7. PRO to IGP, CPO Peshawar.
8. Registrar CPO.
9. Office Supdt: E-III, CPO Peshawar.
10. Accountant CPO Peshawar.

To

The Worthy Provincial Police Officer,
Government of Khyber Pakhtunkhwa,
Peshawar

Subject:- **DEPARTMENTAL APPEAL AGAINST THE ORDER NO.S/158-72/15 DATED 09-01-2015 PASSED BY THE LEARNED DIG/HQRS: KHYBER PAKHTUNKHWA. WHEREBY THE APPELLANT WAS AWARDED MAJOR PENALTY OF COMPULSORY RETIREMENT FROM SERVICE.**

PRAYER IN APPEAL

By accepting the appeal the impugned order No.S/158-72/15, dated 09-01-2015 passed by the learned Deputy Inspector General of Police, Headquarters Khyber Pakhtunkhwa Peshawar, may very graciously be set aside and the appellant may kindly be reinstated in service with full back wages and benefits.

RESPECTED SIR,

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

1. That the appellant joined the service of Police Department as Constable in the year 2004 and then rose up to the post of Sub Inspector on account of his dedication, devotion and commitment to his job. He had 10 years unblemished service record to his credit.
2. That the appellant was performing his duty with great zeal, zest and devotion. But strangely, he was placed under suspension on the basis of following false and baseless allegations vide officer order dated 25-08-2014 (Copy Annex-A)



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ANNEX 2 L




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3. That thereafter, "Preliminary Inquiry" was conducted at the back of appellant in which neither any witness was examined nor the appellant was provided any opportunity of cross-examination. But the inquiry Committee on the basis of bald and naked evidence held the appellant guilty of charge of misconduct.

4. That the appellant was served with Charge Sheet alongwith Statement of allegation. It was alleged that the appellant in conveyance with other officers facilitated the process of illegal recruitment of 378 candidates. It was further alleged that he also assisted in recruitment of 169 candidates appointed by un-notified Committee and that he also processed the case regarding transfer of 37 Constables to FRP Kohat for allotment of Constabulary Numbers illegally. The appellant submitted reply and denied the allegations and also termed the same as fallacious, malicious and misconceived. He further added that the performed his duty justly, fairly and in accordance with law. He prayed that he may be exonerated of the charges leveled against him in the charge sheet **(Copies of Charge Sheet alongwith statement of allegations & reply are appended as B to D)**

5. That the aforesaid reply was not found satisfactory and as such inquiry Committee was constituted to probe into the allegations leveled against the appellant in the charge sheet. The appellant was summoned to appear before the committee and explain his position regarding the allegations. He participated in the inquiry, denied the allegations and reiterated the same facts and justification enumerated earlier but this statement of the

(43) 

appellant was neither recorded nor any witness was examined in his presence. He was also not provided any chance of cross-examination. The Inquiry Committee held the appellant guilty of **“irregularity and deviation from established rules and principles during the recruitment process in question is established beyond shadow of doubt. Muhammad Ibrar was the then OSI who acted in defiance of set rules and reportedly he was a central figure during the entire process. Having found guilty of malpractices, this inquiry committee recommends appropriate penalty admissible under the rules”**.

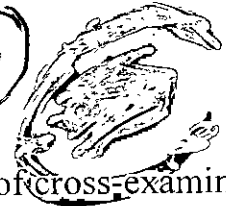
6. That thereafter, the appellant was neither service with a show cause notice nor he was provided any opportunity of personal hearing being the requirement of law. But he was straightaway awarded major penalty of compulsory retirement from service illegally by an order dated 09-01-2015 passed by DIG Hqrs: KPK, Peshawar.
7. That the appellant now assails the impugned order before the Hon'ble Appellant Authority inter-alia on the following grounds.

GROUND OF APPEAL

- A That no fair and impartial inquiry was constituted against the appellant in order to substantiate his guilt in respect of allegations leveled against him in the charge sheet. The Inquiry Committee neither examined any witness in the presence of



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appellant nor he was provided any chance of ~~cross~~ examination.

Similarly, the statement of appellant was neither recorded nor his version in respect of charge was considered. Thus, the appellant has been condemned/penalized without being heard, contrary to the basic principle of natural justice known as "**Audi Alteram Partem**". Therefore, the impugned order is against the legal norms of justice.

B That the Inquiry Committee examined all the fresh recruits/appointees in order to prove the allegations in respect of corruption against the appellant and co-accused. These witnesses have categorically admitted that they had not given any illegal gratification to any officer of the department in respect of their appointments despite the fact that they were thoroughly cross-examined by the Inquiry Committee but nothing favorable could be elicited from their mouth in favour of the department against the appellant. It would be advantageous to reproduce herein the relevant portion of the said statement for facility of reference:-

"This inquiry committee formerly recorded statement of recruits and none of them mentioned about bribing any police officer in getting appointed through this recruitment process".

Thus, it is abundantly clear from the above statement that the stance of department in respect of corruption in the process of recruitment has been totally negated. But despite thereof, the Inquiry Committee has discarded this important piece of evidence without any cogent and valid reasons. Therefore, the

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impugned order passed on the basis of such findings is against the spirit of administration of justice.

C That the Competent Authority was bound under the law to examine the record of inquiry in its true perspective and in accordance with law and then to apply his independent mind to the merit of the case but he failed to do so and awarded major penalty of compulsory retirement from service to the appellant despite the fact that the allegations as contained in the charge sheet had not been proved in the so-called inquiry. Thus the impugned order has no sanctity under the law.

D That the appellant was not served with a show cause notice to explain his position in respect of allegations as well as inquiry findings and awarding of major penalty. Therefore, the Competent Authority has blatantly violated the law laid down by **August Supreme Court of Pakistan reported in 2009-SCMR-605 (citation-e)**. The relevant citation is reproduced as under:-

(C) Civil Service:

----Misconduct, charge of----

Employee's right to show cause notice before passing of termination order against him by competent authority-----

Therefore the impugned order is liable to be set aside on this score alone.

E That the appellant was also not provided any opportunity of personal hearing before imposition of Major Penalty of compulsory retirement from service being the requirement of law as laid down by the **August Supreme Court of Pakistan**



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in case reported in 2006-SCMR-1641 (Citation-C). the relevant citation is mentioned below:-

(C) Government Servants (Efficiency and Discipline) Rules, 1971---

-----Rr.4(b), 5 & 6---Inquiry proceedings-----

Major penalty, imposition of ---Personal hearing to civil servant, opportunity of ----scope----such opportunity must be afforded by the authority competent to impose major penalty or his delegate.

It is well settled law thus the decision of August Supreme Court of Pakistan is binding on each and every organ of the state by virtue of Article 189 & 190 of the **Constitution of Islamic Republic of Pakistan**. Reliance can be placed on the judgment reported in 2010 PLC (C.S) 804 (Citation-b). The relevant citation is as under:-

(b) Constitution of Pakistan (1973)-----

-----Arts.189 & 190 -----Judgment of Supreme Court is binding on each and every organ of the state by virtue of Arts. 189 and 190 of the **Constitution**.

But despite thereof, the Competent Authority has failed to honor the said dictum of August Supreme Court of Pakistan.

F That the Competent Authority has passed the impugned order in mechanical manner and the same is perfunctory as well as non-speaking and also against the basic principle of administration of justice. Therefore, the impugned order is not tenable under the law.

G That the impugned order is based on conjectures and surmises. Hence the same is against the legal norms of justice.

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H That the impugned order is suffering from legal infirmities and as such the same is bad in law.

In view of the above narrated facts and grounds, it is, therefore, humbly prayed that the impugned order No. S/158-72/15 dated 09-01-2015 passed by the learned DIG/Hqrs: Khyber Pakhtunkhwa, Peshawar may very graciously be set aside and the appellant may kindly be reinstated in service with full back wages and benefits.

Your's Obediently,

Dated 12-01-2015

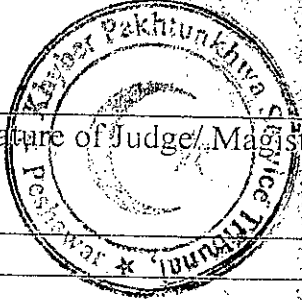
Muhammad Ibrar
Ex-Sub Inspector
R/O
PO Nahaqi, Daudzai
District Peshawar

Received
Boi. Del

13/1/15

9:00 PM

03059078214

Sr. No.	Date of order/ proceedings	Order or other proceedings with signature of Judge/Magistrate
1	2	3
	13.11.2015	<div data-bbox="1125 236 1428 537" style="text-align: right;">  </div> <p style="text-align: center;">KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.</p> <p>1. Service Appeal No. 1340/2014, Shakeel Ahmad, (Mr. Muhammad Asif Yousafzai, & Mr. Rizwanullah, Advocates)</p> <p>2. Service Appeal No. 1369/2014, Amin Khan, (Mr. Rizwanullah, Advocate)</p> <p>3. Service Appeal No. 1370/2014, Noor Muhammad (Mr. Rizwanullah, Advocate) Versus the Provincial Police Officer, KPK, Peshawar etc. (Mr. Usman Ghani Marwat, Sr.G.P).</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p><u>PIR BAKHSH SHAH, MEMBER.-</u> Appellants with their respective counsel (M/S. Muhammad Asif Yousafzai & Rizwanullah, Advocates), Mr. Usman Ghani, Senior Government Pleader with Falak Nawaz, DSP (Legal) for the respondents present.</p> <p>2. In August, 2013 a number of Constables were recruited in the FRP, Khyber Pakhtunkhwa Police. At the relevant time appellant Shakeel Ahmad was Inspector in FRP whereas appellant Amin Khan, Sub Inspector was a Reader to Deputy Commandant FRP namely Younis Javed Mirza. Charges against these appellants Shakeel Ahmad and Amin Khan as per the charge sheets are as follows:-</p> <ol style="list-style-type: none"> 1. That you in connivance with your officer facilitated the illegal process of recruitment of 378 candidates. 2. That you also assisted in recruitment of 169 candidates recruited by un-notified committee and

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

3. That with your ulterior motive also processed transfer of 37 Constables to FRP/Kohat for allotment of Constabulary Numbers.

3. Appellant Noor Muhammad was also Sub Inspector who was working as OSI FRP, Kohat with Mr. Hashmat Ali Zaidi who was Acting Superintendent of Police. The following charges were leveled against appellant per charge sheet on record:-

1. That you in connivance with your officer facilitated the illegal process of recruitment of 28 candidates in FRP recruitment, 2013.
2. That you deliberately knowingly assisted the officer in above recruitment which was made after the committee recruitment and
3. That with your connivance candidate having domicile of other districts were also recruited.

4. After a fact finding enquiry, followed by issuance of charge sheet and statement of allegations, a regular departmental enquiry was conducted by a committee comprising of the following officers:-

1. Mr. Muhammad Saeed, PSP Regional Police Officer; Mardan.
2. Mr. Muhammad Ali, PSP, DPO Abbottabad and
3. Mr. Abdur Rashid, DPO Bannu.

According to the department, the process of recruitment were illegal and irregular mainly for the following reasons:-

1. That one of the Members of selection committee namely Younis Javed Mirza performed in his dual capacity as S.P and Deputy Commandant, FRP which committee was without Secretary.
2. That recruitment was meant for the entire province for

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 Khayber Pakhtunkhwa
 Service Tribunal
 Peshawar

which purpose, separate selection committees were constituted for separate regions, however, the selection committees for Peshawar also enlisted a lot of constables for other regions.

3. That while committing irregularities in advertisements, schedule etc. the concerned personnel also failed to produce record to the enquiry committee.

Consequently, appellant Amin Khan and Noor Muhammad were compulsorily retired from service vide impugned orders dated 19.08.2014 against which orders their departmental appeals also proved unsuccessful which were rejected by the Provincial Police Officer vide his order dated 03.2.2015. Similarly, appellant Shakeel Ahmad was also compulsorily retired by Addl. I.G of Police (Headquarters) vide his order dated 21.08.2014 and his departmental appeal was also disposed of (rejected) by the same office converting his appeal into review petition. Hence above separate appeals of the appellants before this Tribunal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 which are proposed to be decided by this single judgment. We propose, to dispose off all the appeals by this single judgment.

5. Arguments heard and record perused.

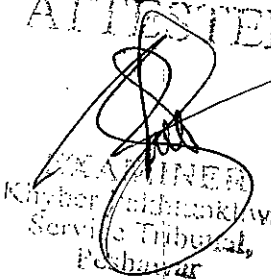
6. The learned counsel for the appellants submitted that the appellants were neither members of the selection committee nor competent to constitute the selection committees and further that none of the appellants is a signatory on the merit list or the appointment orders of the recruitees, therefore, they have been

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unlawfully and illegally proceeded against and punished. That they were punished in order to make them escape goat for the defaulting officers at the helm of affairs. It was further submitted that the appellants were not let to cross examine the witnesses, nor served with show cause notice nor given opportunity of personal hearing and thus they were deprived of their right of defence. It was next submitted that findings of the enquiry committee is based on no evidence but based on surmises & conjectures recommended penalty on baseless grounds that the appellants were corrupt, ill reputed, lived a life style beyond their ostensible means which allegations are not subject matter of the charge sheet and thus findings of the committee are totally unlawful, unfounded and wrong. It was also submitted for appellant Shakeel Ahmad that his appeal was wrongly converted into review petition and decided by the same office who had imposed penalty in his original order, thus he was deprived of his right of appeal. To conclude the arguments for the appellants, the learned counsel submitted that the impugned orders are not maintainable in the eyes of law. In the course of arguments, learned counsel for the appellants also assisted the Tribunal to go through the material on record, particularly reports of the fact finding and regular enquiries and also referred to the following decisions of the august Superior Courts:-

1. 1989-SCMR-1690,
2. 1997-SCMR-343,
3. 2004-PLC(C.S)957,
4. 2006-SCMR-1641,
5. 2009-SCMR-605, and
6. 2009-PLC(C.S)161.

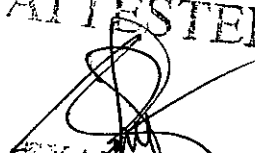
ATTESTED

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Peshawar

It was summed up that as the impugned orders are unlawful, therefore, the same may be set aside and the appellants may be reinstated into service with all back benefits.

7. These appeals were resisted by learned Senior Government Pleader (Mr. Usman Ghani) who stated that the process of irregular and illegal recruitment of so many constables established on record which recruitment processes were associated and facilitated by the appellants with the concerned officers for their ulterior motives and extraneous considerations and as both enquiry reports are based on facts and evidence, hence the enquiry committee has rightly recommended appellants for imposition of major penalty. He further submitted that full opportunity of defence and personal hearing was given to the appellants and as the appellants were punished after due process of law and after observing all the codal formalities, therefore, the appeals may be dismissed.

8. That irregularity and illegality was committed in the process of selection and recruitment of the constables is evident from record particularly report of the fact finding enquiry. The appellants were nominated for disciplinary proceedings in that report.

9. The appellant Shakeel Ahmad was Inspector in FRP, appellant Amin Khan as Reader to the Deputy Commandant, both subordinate to the Deputy Commandant Younis Javed

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Mirza whereas appellant Noor Muhammad as OSI was working with Acting S.P Hashmat Ali Zaidi. Charge sheet and statement of allegations to appellants Amin Khan and Noor Muhammad were issued by the D.I.G of Police (Headquarters), Khyber Pakhtunkhwa, Peshawar. Their statement of allegations are also available on their respective appeals according to which regular enquiry committee constituted against them, comprised of M/S D.I.G Muhammad Saeed Wazir, Regional Police Officer, Mardan, SSP Muhammad Ali, District Police Officer, Abbottabad and S.P Abdul Rashid, Deputy Commandant, FRP. There is no statement of allegations in case of appellant Shakeel Ahmad before us as to who was the enquiry committee against him. However, enquiry report submitted against all appellants has been submitted by the committee headed by Mr. Muhammad Saeed, RPO, Mardan signed alongwith only Muhammad Ali, District Police Officer, Abbottabad. This report was not signed by the third Member Abdul Rashid. For change in the enquiry committee there is no order on record. We have thoroughly gone through the report of the fact finding enquiry in which there is nothing to show as to how, where and when appellants rendered unlawful assistance and facilitated and connived with the concerned officers hence we are unable to conclude that sans, their official duty with the concerned officers, they also rendered any illegal assistance. To make the point further clear, we would like to reproduce the very discussion and findings of the regular enquiry regarding the appellants one by one, to show that no evidence was collected

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by this committee also.

About Inspector Shakeel:-

Inspector Shakeel was serving as Reserve Inspector during the period that the instant recruitment in FRP, Headquarters took place. He is charged in proceedings which are reproduced in Section-4 of this report. He has denied the allegations and charges leveled against him. A probe was made through different sources regarding his role in recruitment and his general reputation and conduct while serving in FRP. It has transpired that Inspector Shakeel in the capacity of R.I, FRP, Headquarters was very influential and he was a central figure in the irregularities committed during the instant recruitment. Further reliance is made on the statement of Mr. Younis Javed as stated in part 7 of this report. He has a reputation of a corrupt officer who allegedly lives beyond his ostensible means. It has also been learnt through reliable sources that he has amassed wealth and assets. However, the same was not probed into as it was beyond the mandate of this Inquiry Committee. Moreover, this entire scandal revolves around his name. On condition of anonymity the committee was told by many sources of his involvement in corrupt practices in the recruitment process. He is recommended for major punishment.

About Amin Khan, S.I

Amin Khan, S.I was serving as Reader to Deputy Commandant FRP. During discreet probe it was revealed that he has been the dealing hand and collected money from candidates. He is recommended for major punishment.

About Noor Muhammad SI/PC

He was serving as OSI FRP, Kohat. The charges leveled against him could not be proved. However, it is pertinent to mention that he enjoys the reputation of a corrupt officer who allegedly is living much beyond his ostensible means. During discreet probe it was revealed that he has made fortunes in former recruitments but since it is not in the mandate of this inquiry committee to investigate about the assets and property of these officers, hence the same was not probed into. He is recommended for major punishment.

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10. Undoubtedly, this report has also not collected evidence against the appellants and has relied upon their

information through discreet enquiry, indirect perception of ill reputation of corruption and living a life beyond their ostensible means which are also not subject of the charge sheet against them. A focused perusal of the regular enquiry would show that the same is like more a fact finding enquiry than a regular enquiry against the appellants. The report of the regular enquiry convey as if it did not focus on the charge sheets framed against the appellants and has uttered contradictory stances when statement of Younis Javed Mirza against Inspector Shakeel Ahmad was found wrong but later on relied upon.

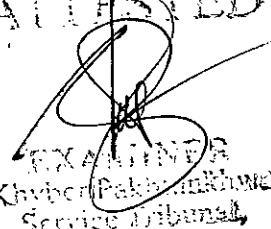
11. The above discussion in view, this cannot be denied that appellants Shakeel Ahmad and Amin Khan were in the subordination of Younis Javed Mirza, Deputy Commandant FRP, who has signed the merit list of the candidates and has also signed on the appointment letters, so is the case of appellant Noor Muhammad who was subordinate to Hashmat Ali Zaidi. Being subordinate to Younis Javed Mirza, and Hashmat Ali Zaidi, the appellants were legally bound to render all legal and official assistance to their bosses. None of the committees whether fact finding or the regular, has taken pains to bifurcate the lawful & official assistance of the appellant from their unlawful and malafide corrupt assistance, hence this Tribunal is unable to draw a distinctive line between the two in the process of these selections/recruitments. Consequently, the Tribunal is constrained to observe that for the lack of solid evidentiary materials on record, we cannot infer that the

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assistance rendered by the appellants was unlawful, irregular, prompted by malafide and extraneous consideration. In our view, the CPO should have constituted a regular enquiry under the headship of a non police authority with the professional assistance of the police officers.

12. Perusal of the original impugned order shows that no opportunity of final show cause notice or personal hearing has been provided to the appellants. Similarly the impugned order of the appellate authority dated 3.2.2015 shows that he concluded that the appellants are corrupt and lived a life beyond their known means of substance and has further held that the same is established on record. We are afraid that the Tribunal cannot agree with this findings of the appellate authority as we have already stated in this judgment that no evidence of corruption of the appellant has been collected by the enquiry committee and further that the same was not the charges in the charge sheet against the appellants. It was also pointed out during the course of arguments that Younis Javed Mirza has been only demoted to the rank of DSP. The appellants, have, on the other hand, been compulsorily retired. Similarly, Hashmat Ali Zaidi was found innocent like appellant Noor Muhammad who was also found innocent and exonerated by the committee but he was also awarded punishment by the competent authority.

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13. In the light of the foregoing entire discussion, the Tribunal has no option but to hold that the impugned orders

cannot be maintained and liable to be set aside. Though irregularities and illegalities were committed in the process of selection/recruitments is established by the two enquiry committees cited above of the constables but who did it, how and for what reason and what role was played by appellants in this whole game, we may observe that to sift grain from chaff the department may embark upon denovo proceedings against appellants which should be concluded within a period of 45 days after receipt of this judgment. Back benefits shall be subject to the outcome of the proceedings denovo. Needless to mention that the impugned orders are set aside and appellants are reinstated into service to face proceedings denovo. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
13.11.2015.

*ed/- Pir Bakhtsh Shah,
Member*

*ed/- Abdul Latif,
Member*

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 04-07-16
 Number of Words 9000
 Copying Fee 22
 Urgent 2
 Total 24
 Name of Copyist [Signature]
 Date of Completion of 04-07-16
 Date of Delivery of 04-07-16

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

Service Appeal No. 1055/2015



W.P. Provincial
Service Tribunal
Diary No. 1070
Date 14-9-15

Younas Javed S/o Mirza Ahmad Khan
R/o House No.163, Street No.9, Sector E-3,
Phase-I, Peshawar
D.S.P, C.P.O PeshawarPetitioner

VERSUS

- 1) Provincial Police Officer KPK. (CENTRAL POLICE OFFICE SAHIBZADA ABDUL QAYYUM ROAD PESHAWAR CANTT)
- 2) Govt. of KPK through Secretary Home Civil Secretariat & Secretariat, Peshawar.
- 3) Chief Minister KPK as competent Authority Chief Minister Secretariat, Peshawar.

.....Respondents

Filed to-day
14/9/15

*Appeal u/s 4 of Service Tribunal Act
against order dated 28.05.2015
whereby Petitioner is reduced to
lower grade which is illegal against
law and facts whereas departmental
appeal/review Petition dated
05.06.2015 is un-responded even after
lapse of 90 days*

Re-submitted
11/10/15

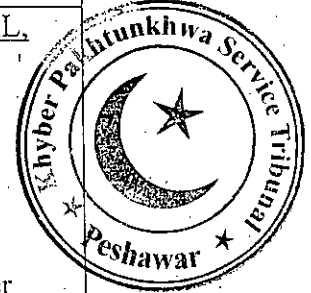
PRAYER:

*On acceptance of this appeal order
dated 28.05.2015 passed by
respondent No.3 may please be set
aside and Petitioner may please be
restored to his original position with
all back benefits. Any other relief
deemed fit may also be graciously
granted.*


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Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	11.02.2016	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>PESHAWAR.</u></p> <p style="text-align: center;">APPEAL NO.1055/2015</p> <p style="text-align: center;">(Younas Javed-vs- Provincial Police Officer Khyber Pakhtunkhwa, Peshawar and others).</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER:</u></p> <p>Appellant with counsel (Mr. Khalid Rehman, Advocate) and Mr. Falak Nawaz, DSP (Legal) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.</p> <p>2. On calling in of this appeal, Learned counsel for the appellant at the outset, stated that this appeal is identical with the decided appeal of Inspector Shakeel Ahmad bearing appeal No. 1340/2014 decided on 13.11.2015 which was remitted by this Tribunal to the respondent-department for <i>de-novo</i> enquiry and that the instant appeal may also be remitted to the respondent-department for <i>de-novo</i> enquiry on the same terms in accordance with law and rules and for which purpose the impugned order may be set aside. This statement was not rebutted by learned AAG who agreed with learned counsel for the appellant by stating that he has no</p>



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objection if the appeal is remitted. Since the said contention of the learned counsel for the appellant was not resisted, therefore, this case is also remitted to the respondent-department on the same terms of appeal of Shakeel Ahmad for *de-novo* enquiry by strictly adhering to the policy contained in the circular of Establishment department bearing No. SOR-V(E&AD)Inst:/08 dated Peshawar the 16th April, 2009. Needless to mention that in the meanwhile the impugned order dated 28.05.2014 stands set aside. Appeal is disposed of accordingly. Parties are left to bear their own costs. File be consigned to the record.

Announced

11.02.2016

Sd/- Pir Bakhtish Shah,
Member

Certified to be true copy
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Sd/- Abdul Latif,
Member

Date of Presentation of Application 22-06-17
Number of Words 1200
Copying Fee 8-
Urgent 2-
Total 10-
Name of Copyist [Signature]
Date of Completion of Copy 22-6-17
Date of Delivery of Copy 22-6-17

SERVICE APPEAL NO.1055/2015 YOUNAS JAVED VS PROVINCIAL POLICE OFFICER KHYBER PAKHTUNKHWA AND OTHERS.

A meeting of the Scrutiny Committee on the above titled subject was held on 08-04-2016 under the Chairmanship of Secretary Law Department in order to determine the suitability / Fitness of the subject cases for filing of appeal / CPLA in the upper forum or otherwise.

2. Following attended the meeting:-

1. Mr. Rab Nawaz Khan
Additional Advocate General
2. Mr. Qamar Ali
Deputy Secretary (Judl)
Home & T.As Department
3. Mr. Falak Nawaz
DSP (Legal)
CPO Peshawar
4. Mr. Shakeel Asghar
Deputy Solicitor
Law Department

3. When the subject case was placed before the S: Committee for discussion, in continuation of the previous meeting dated 01-04-2016 and in response to the queries of the Scrutiny Committee as raised in the previous meeting, the representative of Police Department submitted that no appeal has been filed in similar nature connected cases of accused appellants who were involved with the petitioner / appellant rather the Administrative Department implemented the judgment in letter and spirit and on further query of Scrutiny Committee regarding the reasons of discrimination with the subject appellant the representative failed to pin point the differentia between the two cases who were charge sheeted jointly which was not responded properly and the Scrutiny Committee also observed that the Services Tribunal rightly remanded the case for denovo inquiry by strictly adhering the policy contained in the circular of the Establishment Department bearing N.SOR-V(E&AD)Inst:/08 dated 16-04-2009.

4. Hence, in view of above statement it was decided with consensus and declared the subject case was an unfit case for filing of appeal / CPLA in the upper forum and advised the Administrative Department to implement the judgment in letter and spirit.


(Shakeel Asghar)
Deputy Solicitor

CHARGE SHEET

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I, Pervez Khattak, Chief Minister, Khyber Pakhtunkhwa Peshawar as competent authority, hereby charge you, Younis Javed Mirza Superintendent of Police (BS-18), as follows:

That you, while posted as Deputy Commandant/FRP committed the following irregularities:

- i. That while posted as Deputy Commandant/FRP have recruited 378 candidates without adopting prescribed procedure and schedule;
- ii. That 169 candidates were recruited by un-notified Committee for the FRP/HQs: covering all Regions with your connivance.
- iii. That you have also transferred 37 Constables without number to FRP Kohat where they were allotted Constabulary numbers and
- iv. That all you did it without complying the directions of Police High-ups and with ulterior motives.

2. By reasons of the above, you appear to be guilty of misconduct under rule-3 of the Khyber Pakhtunkhwa Government, Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rule 4 of the rules ibid.

3. You are, therefore, required to submit your written defence within seven days of the receipt of this Charge Sheet to the Inquiry officer /inquiry committee, as the case may be.

4. Your written defence, if any, should reach the inquiry officer/inquiry committee, within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-party action shall be taken against you.

5. Intimate whether you desire to be heard in person.

6. A statement of allegations is enclosed.

Pervez Khattak
(PERVEZ KHATTAK)
CHIEF MINISTER,
KHYBER PAKHTUNKHWA.

09.07.2014

1751

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DISCIPLINARY ACTION

I, Pervez Khattak, Chief Minister, Khyber Pakhtunkhwa Peshawar as competent authority, am of the opinion that Younis Javed Mirza Superintendent of Police (BS-18), has rendered himself liable to be proceeded against, as he committed the following acts / omissions, within the meaning of rule 3 of the Khyber Pakhtunkhwa Government, Servants (Efficiency and Discipline) Rules, 2011.

STATEMENT OF ALLEGATIONS

- i. That while posted as Deputy Commandant/FRP have recruited 378 candidates without adopting prescribed procedure and schedule;
- ii. That 169 candidates were recruited by un-notified Committee for the FRP/HQrs: covering all Regions with your connivance.
- iii. That he have also transferred 37 Constables without number to FRP/Kohat where they were allotted Constabulary numbers and
- iv. That all he did it without complying the directions of Police High-ups and with ulterior motives.

2. For the purpose of inquiry against the said accused with reference to the above allegations, an inquiry officer / inquiry committee, consisting of the following, is constituted under rule 10(1)(a) of the rules ibid:

- i. Mr. Muhammad Saeed. DIG Mardan.
- ii. Mr. Muhammad Ali DPO Attd.
- iii. Mr. Abdur Rasheed Dy. Com: FRP.

3. The inquiry officer / inquiry committee shall, in accordance with the provisions of the rules ibid, provide reasonable opportunity of hearing to the accused, record its findings and make, within thirty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer / inquiry committee.

Pervez Khattak
(PERVEZ KHATTAK)
CHIEF MINISTER,
KHYBER PAKHTUNKHWA.
09.07.14.



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

No. 950/Legal dated Peshawar, the 31st /2016.

To: - The Section Officer (Courts),
Government of Khyber Pakhtunkhwa,
Home & TAs Department Peshawar.

Subject:- JUDGMENT - APPEAL No. 1055/2015 YOUNAS JAVED -VS-
PROVINCIAL POLICE OFFICER, KHYBER PAKHTUNKHWA,
PESHAWAR & OTHERS.

Memo:-

In continuation of this office memo No. 560/legal dated 11.03.2016,
on the subject noted above.

On 01.04.2016, a meeting of the scrutiny committee headed by
Secretary to Government of Khyber Pakhtunkhwa, Law, and Parliamentary Affairs
Department Peshawar was held which unanimously agreed conduct of de-novo
enquiry proceedings against Younus Javid Mirza DSP instead of lodging CPLA
before Supreme Court of Pakistan against the judgment of Service Tribunal passed
in the subject cited Service Appeal.

A penalty of reduction in rank was imposed on Younus Javid Mirza
with the approval of competent authority i.e. Honorable Chief Minister Khyber
Pakhtunkhwa, Peshawar vide Notification No. SO (Com/Enq)/HD/2.4/Pol/2014
dated 28.05.2015 therefore, the case needs to be submitted before the competent
authority for de-novo enquiry proceedings.

Facts leading to the present enquiry proceedings are as follows:-

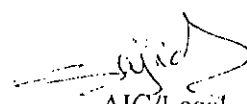
- 1) Younus Javid Mirza DSP the then Deputy Commandant FRP (BPS-
18) was placed under suspension by Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar as he was allegedly involved in
illegal recruitment of constables in FRP. Initially facts finding enquiry
was conducted and the enquiry committee recommended that Younus
Javid Mirza with active connivance of his subordinates recruited 378
candidates as constables without adopting prescribed procedure and
scheduled. He also recruited 169 candidates through un-notified
committee and transferred 37 constables to Kohat without allotting
them constabulary numbers. Over and above he was held responsible

urgent
Placed on file pl2.

SA
SOE 19/4/16

- for not complying with the directions of Police high ups and he did all these illegalities and irregularities with ulterior motives. (Copy of preliminary enquiry report is enclosed).
- 2) On conclusion of preliminary enquiry Honorable Chief Minister issued charge sheet based on above allegations to Younus Javid Mirza and enquiry committee comprising DIG Mardan and DPO Abbottabad was constituted for scrutinizing his conduct with reference to the charges leveled against him. (Copy of charge sheet and statement of allegations are enclosed).
 - 3) The enquiry committee conducted detailed enquiry and accused officer was found guilty of the charges. Final show cause notice was issued to the accused officer and accordingly the above penalty was imposed on him. Copy of the enquiry report is enclosed.
 - 4) Accused officer filed review petition and comments were submitted to your office vide this office memo No. 5526/Legal dated 15.12.2014. Copy enclosed.
 - 5) He filed Service Appeal cited as subject and the case was remanded to the department for de-novo enquiry in terms of order passed in service appeals of colleague officers.
 - 6) The case of Younus Javid Mirza is not identical with the colleague officers as he is the principal accused officer. His subordinates were charge sheeted for assisting him in illegal recruitment.

It is therefore, requested that the matter may please be taken up with the competent authority for de-novo enquiry proceedings.


AIG/Legal,
For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar

POWER OF ATTORNEY

In the Court of KPK Session Tribunal Peshawar
Muhammed Usman

} For
} Plaintiff
} Appellant
} Petitioner
} Complainant

VERSUS

Govt of KPK and others

} Defendant
} Respondent
} Accused
}

Appeal/Revision/Suit/Application/Petition/Case No. _____ of _____
Fixed for _____

I/We, the undersigned, do hereby nominate and appoint

IJAZ ANWAR ADVOCATE, SUPREME COURT OF PAKISTAN

and Sajid Anwar Akhmed my true and lawful attorney, for me in my same and on my behalf to appear at Peshawar to appear, plead, act and answer in the above Court or any Court to which the business is transferred in the above matter and is agreed to sign and file petitions. An appeal, statements, accounts, exhibits. Compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply for and receive all documents or copies of documents, depositions etc, and to apply for and issue summons and other writs or subpoena and to apply for and get issued and arrest, attachment or other executions, warrants or order and to conduct any proceeding that may arise there out; and to apply for and receive payment of any or all sums or submit for the above matter to arbitration, and to employ any other Legal Practitioner authorizing him to exercise the power and authorizes hereby conferred on the Advocate wherever he may think fit to do so, any other lawyer may be appointed by my said counsel to conduct the case who shall have the same powers.

AND to all acts legally necessary to manage and conduct the said case in all respects, whether herein specified or not, as may be proper and expedient.

AND I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of this power or of the usual practice in such matter.

PROVIDED always, that I/we undertake at time of calling of the case by the Court/my authorized agent shall inform the Advocate and make him appear in Court, if the case may be dismissed in default, if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us

IN WITNESS whereof I/we have hereto signed at _____
the _____ day to _____ the year _____
Executant/Executants _____
Accepted subject to the terms regarding fee _____

Accepted
3/4/20
A
Sajid Anwar
Adv

Ijaz Anwar

Advocate High Courts & Supreme Court of Pakistan

ADVOCATES, LEGAL ADVISORS, SERVICE & LABOUR LAW CONSULTANT
FR-379, Fourth Floor, Bilqis Plaza, Saddar Road, Peshawar Cantt
Ph: 011-5272150 Mobile: 0333-9107223

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR.

Service Appeal No. 475/2015

Muhammad Ibrar.....(Appellant)

Versus

Government of KPK through Chief Secretary, Khyber Pakhtunkhwa,
Peshawar and others(Respondents)

Subject:- COMMENTS ON BEHALF OF RESPONDENTS

Respectfully Sheweth!

Preliminary Objections:-

- a) The appeal has not been based on facts.
- b) The appeal is not maintainable in the present form.
- c) The appeal is bad for non-joinder and mis-joinder of necessary parties.
- d) The appellant is estopped by his own conduct to file the appeal.
- e) The appeal is barred by law and limitation.
- f) The appellant has not come to the Honorable Tribunal with clean hands.

FACTS:-

1. Correct to the extent that appellant was recruited as constable in Police department and he earned promotion to next ranks on his own turn. He was found guilty of gross misconduct therefore he was compulsorily retired from service vide impugned order.
2. Incorrect, according to the facts finding and regular enquiry reports 378 candidates were directly recruited by FRP head- quarters without observing prescribed procedure and merit policy while 169 candidates were recruited by un-notified committee against the recruitment policy. The appointments were made against the merit policy and laid down procedure and criteria of recruitment. Appellant while posted as OASI FRP facilitated the above illegal enlistment in

FRP. Copy of the facts finding and regular enquiry is enclosed as Annexure-A & B.

3. Incorrect, during course of enquiry initiated against the officers of FRP, it came to light that at the time of illegal recruitment in FRP Zar Khan ASI was not posted as OASI of FRP while Appellant was posted as OASI, therefore, Zar Khan ASI was exonerated while appellant was indicted on charges of facilitating illegal process of recruitment of 378 candidates in FRP in the year 2013 and also recruiting 169 candidates by un-notified committee. Copy of the order is enclosed as Annexure-C.
4. Incorrect, it is stated that facts finding enquiry was conducted into the complaints received to the respondents with regard to recruitment made in FRP against merit and prescribed procedure. All codal formalities were observed during the departmental proceeding initiated against the appellant. The enquiry committee detected commission of gross irregularities in the recruitment. Copy of the facts finding enquiry is already enclosed as Annexure-A & B.
5. Correct to the extent that charge sheet based on allegations of facilitating illegal process of recruitment of 378 candidates, recruitment of 169 candidates by un-notified committee and transfer of 37 constables to FRP Kohat with ulterior motive was issued to appellant and his reply in response to the charge sheet was found unsatisfactory. Regular enquiry was conducted wherein the appellant was found guilty. Therefore, the impugned order was passed.
6. Incorrect, the reply submitted by appellant in response to the charge sheet was found unsatisfactory and eventually impugned order based on the finding report of regular enquiry was passed. The enquiry committee constituted for scrutinizing the conduct of appellant with reference to the charges leveled against him conducted fair and transparent enquiry and submitted finding report based on facts.

7. Incorrect, final show cause notice along with copy of enquiry report was issued to appellant and reply in response to the final show cause notice was found unsatisfactory. Appellant has annexed copy of enquiry report with the appeal which negates his contention of non delivery of copy of finding report to him. He was also heard in person before passing the impugned order.
8. Incorrect, the order was based on the enquiry report and was passed after observing all the legal, procedural, and codal formalities.
9. Incorrect, the departmental appeal of appellant was rejected vide order dated 06.05.2015 and appellant was also heard in person by the review board before rejection of his departmental appeal. Copy of the order is enclosed as Annexure-D.
10. Incorrect, the impugned orders are just, legal and have been passed in accordance with law. The impugned orders are worth retention and the grounds advanced by the appellant are not tenable.

GROUND:-

- A. Incorrect, appellant was treated in accordance with law and rules. Fair opportunity of defense was provided to appellant. Facts finding enquiry followed by regular enquiries were conducted before passing the impugned orders.
- B. Incorrect, the enquiry committee constituted for scrutinizing the conduct of appellant with reference to the charges leveled against him conducted fair and transparent enquiry. The finding report of the enquiry committee proves the impartiality and transparency exhibited by the enquiry committee.
- C. Incorrect, appellant was heard by the enquiry committee as well as the authority as evident from the impugned order. He was also heard by departmental appellate review board. Therefore, appellant has wrongly contended that he was not heard in person.

- D. Incorrect, this Para is mere repetition of Para B of the grounds of appeal. Furthermore, regular enquiry was conducted and proper chance of defense was provided to appellant.
- E. Incorrect, the alleged witnesses were beneficiaries of irregular recruitment therefore, they avoided charging the appellant.
- F. Incorrect, appellant while posted as OASI FRP facilitated process of illegal appointment in the FRP.
- G. Incorrect, the impugned order was passed after evaluating finding report of enquiry committee and examination of the record.
- H. Incorrect, appellant was posted as OASI FRP during the period when illegal appointments were made in the FRP. He despite explicit knowledge mala-fidely processed the recruitment process of 378 candidates and 169 candidate recruited by un-notified committee.
- I. Incorrect, 378 candidates were illegally appointed and the 169 candidates were appointed by un-notified committee as evident from the enquiry report. Appellant facilitated the process of illegal appointment.
- J. Incorrect, in addition to appellant other officers were also held responsible for making illegal recruitment.
- K. Incorrect, the 37 constable were transfer to FRP with ulterior motive of creating vacancies for illegal appointments.
- L. Incorrect, appellant was posted as OASI and was charged with processing recruitment files and he processed the recruitment of candidates against the laid down procedure and merit policy.
- M. Incorrect, appellant has annexed the enquiry report with the appeal meaning there by that he had received the copy of enquiry report.
- N. Incorrect, detailed speaking order was passed on the basis of finding of enquiry committee and in the same vein speaking order was passed on the departmental

appeal of appellant. Appellant was heard in person by the authority as well as the appellate review board.

- O. Incorrect, the impugned orders are well speaking. Furthermore, appellant has not explained the legal infirmities contained in the impugned orders.
- P. Incorrect, the order of competent authority and appellate authority may also be read as integral part of the comments wherein the replies of appellant were rejected.
- Q. Incorrect, long service is no defense of commission of gross mis-conduct and penalty commensurate with the charges has been imposed on appellant.
- R. Incorrect, appellant has compulsorily been retired from service and no enquiry with regard to his present job has been made.
- S. The respondents may also be allowed to raise other point during hearing of the case.

It is therefore, prayed that the appeal may graciously be dismissed with costs.



Chief Secretary,
Khyber Pakhtunkhwa,
Peshawar
(Respondent No.1)

for



Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar.
(Respondent No.2)



Commandant FRP,
Khyber Pakhtunkhwa,
Peshawar
(Respondent No.3)

Annexure, "A₁"

Subject: **FACT FINDING ENQUIRY INTO ALLEGATIONS OF CORRUPTION IN FRP RECRUITMENT.**

Sir,

Under your kind directions vide your good office Memo: No.1357-61/PPO, dated 14.02.2014 the Enquiry Committee has conducted preliminary enquiry into the allegations of irregularities, corruption and extortion of money in FRP recruitment. The enquiry has been completed and fact finding report is as under: -

1. Advertisement for inviting applications.

- Initially advertisement for inviting applications for enrollment as constable in FRP was published by the AIG Establishment CPO in the daily Aaj dated 17.07.2013. **(Annex: A)**
- Subsequently in the daily Mashriq and Aaj another identical advertisement by the Deputy Commandant FRP KPK was published on 20.07.2013 which cancelled the advertisement published on 17.07.2013. **(Annex B)**
- In these advertisements the total number of vacancies were not reflected.
- Similarly distribution of vacancies to each FRP Range has also not been shown.

2. Formation of recruitment committees.

- The CPO vide order No.8872-78/E-II, dated 05.08.2013 constituted recruitment committees for Peshawar, Mardan, Hazara, Malakand, Kohat, Bannu and DIKhan. **(Annex C)**

3. Schedule for recruitment.

- The advertisement for enrollment of FRP constables was detailed as follows:-

- | | |
|--------------------------------|------------------------------------|
| a). Submission of applications | 23.07.2013 to 31.07.2013. |
| b). Physical test | 15 and 16.08.2013. |
| c). Written test | 17.08.2013 |
| d). Interview | 19 and 20.08.2013 (Annex B) |

4. Process of recruitment.

Region	District	Total number of candidates appeared	Candidates Selected by Committee	Candidates directly recruited by FRP HQrs without observing prescribed procedure and schedule	Candid recrui by tl un-not comm:
Kohat	Karak	1405	10	7	1
	Kohat	692	8	2	10
	Hangu	167	24	0	0
Total	3	2264	42	9	11
Bannu	{Bannu}		22	56	20
	{Lakki}		12	27	5
Total	2	2211	34	83	31
DIKhan	{DIKhan}		43	19	11
	{Tank}		38	0	0
Total	2	2208	81	19	11
Malakand	Malakand			15	5
	Swat	604	98	0	1
	Buner	197	49	2	1
	Shangla	500	29	22	5
	Dir Lower	390	96	2	2
	Dir Upper	271	107	0	0
Total	6	2326	440	52	6

Hazara	Hazara				5
	Abbottabad	1301	39	2	1
	Battagram	89	35	0	0
	Mansehra	509	18	0	0
	Kohistan	Not available	Not available	Not available	0
	Haripur	Not available	Not available	16	0
	Torghar	Not available	Not available	Not available	6
Total	6	1899	92	18	4
Mardan	Mardan	1818	83	13	3
	Swabi	389	9	27	1
	Nowshera	Not available	73	111	0
	Charsadda	Not available	36	28	8
Total	4	2207	201	179	35
Peshawar	Peshawar	Not available	Not available	18	169
Grand Total	25	13869	962	378 (Annex-C-I)	(Annex-C-II)

It is worth mentioning here that from the perusal of nominal rolls of FRP Kohat it was ascertained that:-

- Twenty Eight candidates were recruited without committee directly by the SP (DSP) FRP Kohat Range.
- They were recruited on different dates after the committee recruitment.
- Some of them were having domiciles other than Kohat. (Annex-D)

Probe of record of other FRP Ranges is also suggested

• **Irregularities in recruitment of FRP HQrs, Peshawar.**

- o No advertisement for recruitment was made through newspapers.
- o Neither committee for recruitment in FRP HQrs Peshawar was constituted nor request for constitution of committee was made by the quarter concerned.
- o Record reveals that candidates of Region Kohat, Bannu, DIKhan, Malakand, Hazara, Mardan Peshawar and Malakand district were recruited by the FRP HQrs.
- o The recruitment was made after the schedule dates. (Annex-B)

Answer papers of candidates when requisitioned, it was replied that those have been destroyed. (Annex-E)

- o The FRP HQrs has claimed that approval for recruitment was allowed by the then PPO/IGP however perusal of Memo: No.595/PA, dated 20.08.2013 transpires that the then PPO directed as follows :

"Continue transparency, merit must be observed through committee". (Annex-F)

The process for selection of candidates in FRP HQrs reflects that the directives have not been complied with.

- o 37 Constables without number were transferred to FRP Kohat where they were allotted constabulary numbers.

'A/3'

Probe of record of other FRP Ranges is also suggested.
(Annex-G)


- o The FRP HQrs Peshawar in order to justify recruitment in FRP HQrs has made reference to the CSO to honorable Chief Minister to enlist candidates. However in this regard no written direction is available on record. Reply received from FRP **Annex - H.**

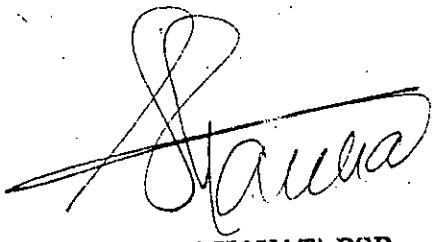
Conclusion

1. The advertisement floated by the AIG Establishment CPO and its subsequently cancellation by the Deputy Commandant FRP and publishing another advertisement is irregular.
2. Advertisement does not reflect the number of vacancies.
3. Distribution of vacancies for each FRP range was not reflected in the advertisement.
4. 378 candidates were recruited by the FRP HQrs without adopting prescribed procedure and schedule.
5. 169 candidates were recruited by the un-notified committee for the FRP HQrs covering all regions.
6. 28 candidates were recruited by the SP FRP Kohat without adopting proper procedure and schedule.

Recommendation

In light of above it is recommended that proper departmental enquiry may kindly be ordered to dig out in depth enquiry so that responsibility could be fixed against the defaulting officers.


(ISHTIAQ AHMAD MARWAT)
Regional Police Officer,
Kohat Region, Kohat.
Member Enquiry Committee


(SHAUKAT HAYAT) PSP
Addl. Inspector General of Police,
Investigation, Khyber Pakhtunkhwa,
Peshawar.
Chairman Enquiry Committee.

(27)

Annexure: "B"
1/1

CONFIDENTIAL

Report of the Inquiry Committee

1. Introduction

An Inquiry Committee was constituted by the Provincial Police Officer Khyber Pakhtunkhwa vide his Order No. 763-69/SE-I dated 09-04-2014 read with Order no. 1062-68 dated 16/4/2014 to investigate into allegations of corruption in FRP recruitment. The committee submitted its Detailed Inquiry report vide **DIG Mardan letter No. 2119/PA, dated 11.08.2014** wherein it recommended to exonerate ASI Zar Khan who was posted as OSI in December 2013 and recommended disciplinary action against ASI Muhammad Ibrar, hence this instant inquiry.

2. Background

The Provincial Police Officer, Khyber Pakhtunkhwa received numerous complaints about allegations of corruption and irregularity in the recruitment process of constables in Frontier Reserve Police. A fact finding inquiry committee was constituted comprising of Additional Inspector General (Investigations) and Regional Police Officer, Kohat that submitted its recommendations on 2nd April 2014 wherein it recommended action against the following officers:

1. Mr. Younas Javed (Former Deputy Commandant FRP)
2. Shakil Ahmad (Former R.I, FRP HQrs)
3. Zar Khan ASI (Former OS.I FRP)
4. Amin Khan S.I (Reader to Deputy Commandant FRP)
5. Hashmat Ali Zaidi (Former SP FRP Kohat)
6. Noor Muhammad SI/PC (Former OSI FRP Kohat)

The fact finding inquiry committee also observed in their report the following observations:

- The advertisement published by AIG(E) was cancelled and another advertisement was published by Deputy Commandant for no obvious reason except that applications from candidates were invited in SP/FRP range instead of respective DPO offices.

- (29)
- " B/2 "
- No committee was constituted for recruitment in FRP HQs Peshawar.
 - Answer papers for candidates when requisitioned by fact finding inquiry were responded to as destroyed.

This inquiry report for officers mentioned at Sr: No. 01 to 06 has been sent to PPO Khyber Pakhtunkhwa vide **DIG Mardan letter No. 2119/PA, dated 11.08.2014.**

3. Constitution of Formal Inquiry Committee

The Inspector General desired that formal enquiry is conducted into the charges and thus this inquiry committee was tasked to probe into the Charges attributed to ASI Muhammad Ibrar during the recruitment process in FRP, KP.

4. Charges

This Inquiry committee was tasked to probe into the charge as below.

ASI Muhammad Ibrar (Former OSI FRP Peshawar)

"That you in connivance with your officer facilitated the illegal process of recruitment of 378 candidates; That you also assisted in recruitment of 169 candidates recruited by un-notified committee and That with your ulterior motive also transfer 37 constables to FRP/Kohat for allotment of Constabulary numbers"

Reply to above charges by ASI Muhammad Ibrar is in negative and he has stated that he has acted in judicious manner and as per orders of his seniors.

5. Inquiry Committee's observations on the whole case:

The general observations of the Committee that go to the heart of the entire case are in respect of the following two matters:

- I. The Recruitment Committee of FRP HQs Peshawar was a **Coram non judice** as it carried out its proceedings without a Secretary and a single officer assumed the role of two Members which tantamount to defeat the very essence and cause for which recruitment committees were constituted i.e. ensuring transparency.
- II. The recruitment was carried out by FRP HQs Peshawar in contravention to the Provincial Police Officer's Instructions circulated vide Order No. 19702-9/E-II dated 13 August 2013 i.e. "Instructions for recruitment in Khyber Pakhtunkhwa Police" thus the enlistment stated as Charges by Recruitment Committee is

(31)

' B/3 '

carried out in complete defiance of the said Instructions cannot be considered as authorized and legitimate.

6. Facts of the Case

1. Applications were invited for enrollment in FRP as per schedule:
 - Submission of applications in SP/FRP Range office: 23-31 July 2013.
 - Physical test: 15-16 August 2013
 - Written Test: 17 August 2013
 - Interview: 19-20 August 2013
2. The Recruitment committee for Peshawar comprising of DIG/Investigations, HQrs: as Chairman and Mr. Younas Javeed Mirza represented as member -I in the capacity of Deputy Commandant FRP, Peshawar and as member-II in the capacity of SP, FRP Peshawar Range, and carried out the proceedings without a Secretary.
3. Member of the above recruitment committee (Mr. Younas Javed) inordinately exceeding his mandated task and sent a letter Number 595/PA dated 20 August 2013 to the then PPO for entertaining applications of candidates falling outside the mandate of Peshawar recruitment committee, stating that 'many candidates of other districts were present for physical and written tests but being candidates of other districts, the selection committee was unable to enlist them'.
4. The above quoted letter produced on record reflects the directives of the then PPO as: **"Continue transparency, merit must be observed through committee"**. It is pertinent to mention that instant letter was sent to PPO on 20 August 2013 (the last date for interviews).
5. On the basis of above, the Recruitment Committee prepared two lists with 380 candidates and 168 candidates as 'Waiting list Nominal roll of FRP Hqrs: Peshawar Candidates of Different Ranges'.
6. Following orders for enlistment of constables were made at dates mentioned against each.

Order Number	Dated	Serial Number corresponding to above lists.
414-45/OSI	30/8/2013	01-90

27 (33)

'B/4'

422-24/OSI	02/09/2013	91-168
508-10/OSI	18/9/2013	340-380
574-78 / OSI	27/9/2013	01 to 157
579-83/OSI	2/10/2013	158-257
613-17/OSI	28/10/2013	258-339

7. Detailed assessment of the facts inquired.

- It is beyond understanding of this committee, as to how candidates ineligible on the basis of Domicile and not entitled to be examined at Peshawar were measured physically and tested in written exam.
- This committee also fails to comprehend the need for destruction of record including written papers where clear order in the form of "Instructions for recruitment in Khyber Pakhtunkhwa Police" issued by Provincial Police Officer's vide Order No. 19702-9/E-II dated 13 August 2013 states in para 2(c) ' **written papers are to be preserved for a period of one year**'. These instructions were circulated well in advance of recruitment process and when these instructions were in place, a need for destruction of papers would make things doubtful and dubious. After having seen the state of affairs on the basis of which proceedings started, and subsequent unavailability of record, nothing is left to be discussed as the above conduct of the then recruitment committee speaks for itself and needs no further deliberation. Therefore, by no stretch of imagination, it can be held that the process was a transparent one
- In response to confirmation about availability of the then PPO's approval as relied upon by Mr. Younas Javed, Registrar CPO vide his letter No. 3538/E-IV replied that original file/ record of the I.G's approval for appointment of constables of other districts and destruction of answer papers is not available on record.
- The Registrar CPO has stated that **no record found in respect of approval granted by the PPO**, which renders this recruitment as unauthorized and reply of Deputy Commandant is unsatisfactory and evasive.
- This inquiry committee formerly recorded statements of recruits and none of them mentioned about bribing any police officer in getting appointed through this

(35)

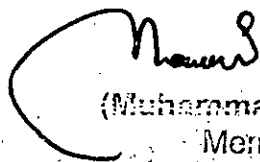
"B/S"

recruitment process and remained tightlipped. During their cross questioning, the candidates gave shaky and inaccurate responses about the place where they were tested, duration of written paper and the office where they submitted their documents. This hints at the fact that they did not go through standard recruitment process and were appointed through back door channels. In instant case, irregularity and corruption seems obvious.

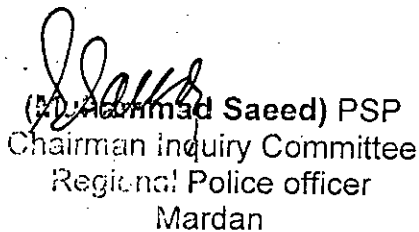
8. Conclusion

This inquiry committee is of the view that Irregularity and deviation from established rules and principles during the recruitment process in question is established beyond shadow of doubt. ASI Muhammad Ibrar was the then OSI who acted in defiance of set rules and reportedly he was a central figure during the entire process. Having found guilty of malpractices, this inquiry committee recommends appropriate penalty admissible under the rules.

Certified that this Inquiry consists of seven (05) pages and each page bears initials of the undersigned members of Inquiry committee.



(Muhammad Ali) PSP
Member
District Police officer
Abbotabad



(Muhammad Saeed) PSP
Chairman Inquiry Committee
Regional Police officer
Mardan

Annexure: C

63
8



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

ORDER.

Departmental Enquiry into the allegations of Corruption in FRP recruitment during August 2013, was conducted through a committee constituted vide this office order No. 1357-61/PPO, dated 14.02.2014 against the officials of FRP.

Regional Police Officer Mardan chairman of the committee submitted the Enquiry report vide his office Memo: No. 2126/PA, dated 13.08.2014, upon which the W/IGP Khyber Pakhtunkhwa Peshawar recorded the following remarks:-

“Please proceed accordingly and produce the Departmental proceeding by 20.03.2014”.

The Enquiry Committee in his report recommended ASI Zar Khan for exoneration and stated that ASI Muhammad Ibrar was posted as OASI FRP at that time when the recruitment in FRP was made.

ASI Muhammad Ibrar the then OASI FRP is hereby place under suspension and also closed to CPO Peshawar for Departmental proceeding.

A committee of the following Officers is constituted to hold a proper Departmental Enquiry in to the allegations and to submit the report within Week.

- a. DIG Muhammad Saeed, RPO/Mardan Region-I, Mardan.
- b. SSP Muhammad Ali DPO/Abbottabad.

(MUBARAK ZEB) PSP
DIG/HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

No. 1674-78/E-III. Dated Peshawar, the 25 18/2014.

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

1. Addl: IGP/HQrs: Khyber Pakhtunkhwa Peshawar.
2. Addl: IGP/Commandant FRP Khyber Pakhtunkhwa Peshawar.
3. Regional Police Officer Mardan Region Mardan. Duplicate copy of Charge Sheet/statement of Allegations are enclosed for devilry upon the defaulter ASI. His signature may be obtained on duplicate copy and returned to this office.
4. District Police Officer Abbottabad.
5. AIG/Establishment CPO Peshawar.



Annexure: D^v

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

No. S/ 2723 /15, Dated Peshawar the 06/05/2015.

ORDER

This Order will dispose off the departmental enquiry against Ex-SI Muhammad Ibrar compulsorily retired from service by DIG/HQrs: Khyber Pakhtunkhwa order Endst: No. S/158-72/15, dated 09.01.2015.

In the light of recommendations of Review Appeal Board meeting held on 22.04.2015, the board examined the enquiry file in detail & other relevant documents. He was also heard in person. He has been awarded punishment declaring him guilty after completion of all formalities. His appeal has no substance nor has he produced any evidence.

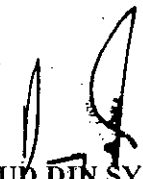
Keeping in view of above, the appeal has no weight hence rejected and filed.

Sd/-
NASIR KHAN DURRANI
Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. S/ 2724-28 /15, dated Peshawar, the 06-05 /2015.

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

1. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
2. PSO to IGP/Khyber Pakhtunkhwa, Peshawar.
3. PRO to IGP/Khyber Pakhtunkhwa, Peshawar.
4. Office Supdt: E-III, CPO, Peshawar.
5. Central Registry Cell (CRC) CPO.


(WAQAR UD DIN SYED)
DIG/Finance & Procurement
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

In the matter of
Appeal No. 495/2015

Muhammad Ibrar.....(*Appellant*)

VERSUS

Provincial Police Officer Khyber Pakhtunkhwa, Peshawar &
others.....(*Respondents*)

REJOINDER ON BEHALF OF THE APPELLANT

Respectfully submitted:

ON PRELIMINARY OBJECTIONS:

- a. Contents incorrect and misleading, the appeal is based on facts.
- b. Contents incorrect and misleading, the appeal being filed well in accordance with the prescribed rules and procedure hence maintainable in its present form.
- c. Contents incorrect and misleading all necessary parties are arrayed in the instant appeal.
- d. Contents in correct and misleading no rule of esstople is applicable in the instant case.
- e. Contents incorrect and misleading, the instant appeal has been filed well within the prescribed period of limitation.
- f. Contents incorrect and misleading the appellant has come to the court with clean hands.
- g. Contents incorrect and misleading, the appellant has illegally been awarded the penalty of Dismissal from service hence he has got the necessary cause action to file the instant appeal.

ON FACTS

1. Contents partially admission on part of the respondents, therefore to the extent of admission needs no rejoinder, however rest of the reply submitted to Para 1 is incorrect and misleading. Moreover contents of Para 1 of the appeal are true and correct.
2. Contents of Para 2 of the appeal are true and correct, the reply submitted to the Para is incorrect and misleading.
3. Contents of Para 3 of the appeal are true and correct, the reply submitted to the Para is incorrect and misleading.
4. Contents of Para 4 of the appeal are true and correct, the reply submitted to the Para is incorrect and misleading. Moreover this Honorable Tribunal has vide judgment and order dated 13.11.2015, already accepted the appeals of the similarly placed employees those who were proceeded against for the same charges and were awarded penalties on the basis of the same inquiry. **(Copy of the Judgment is attached as Rj-I)**
5. Contents of Para 5 of the appeal are true and correct, the reply submitted to the Para is incorrect and misleading.
6. Contents of Para 6 of the appeal are true and correct, the reply submitted to the Para is incorrect and misleading.
7. Contents of Para 7 of the appeal are true and correct, the reply submitted to the Para is incorrect and misleading.
8. Contents of Para 8 of the appeal are true and correct, the reply submitted to the Para is incorrect and misleading.
9. Contents of Para 9 of the appeal are true and correct, the reply submitted to the Para is incorrect and misleading.
10. Contents of Para 10 of the appeal are true and correct, the reply submitted to the Para is incorrect and misleading.

GROUND

The Grounds (A to S) taken in the memo of appeal are legal and will be substantiated at the time of arguments.

It is therefore humbly prayed that the appeal of the appellant may please be accepted as prayed for.

[Signature]
Appellant

Through

[Signature]

IJAZ ANWAR
Advocate, Peshawar.

[Signature] &
SAJID AMIN

Advocate, Peshawar.

AFFIDAVIT

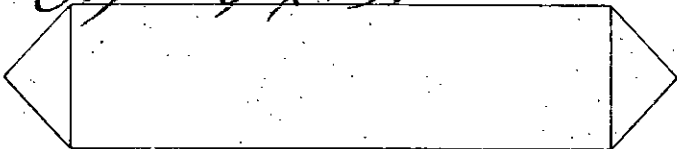
I do, hereby solemnly affirm and declare on oath that the contents of the above rejoinder as well as titled appeal are true and correct and nothing has been kept back or concealed from this Honourable Tribunal.

[Signature]
Deponent

[Signature]

KHALID MAHMOOD
ATTESSED
NOTARY PUBLIC
PESHAWAR HIGH COURT
ADVOCATE

بعدالت جمعہ ستمبر ۲۰۱۶ء سے شروع ہونے والی کارروائی



2017ء منجانب

بنام

محمد ابراہیم

سید علی

مورخہ

مقدمہ

دعویٰ

جرم

کوئٹہ دہلیس

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

آن مقام ~~کوئٹہ~~ کیلئے ~~یا کہ مسلمہ~~ ~~سید علی محمد~~ مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرتے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

2017

ماہ

سپتمبر

المرقوم

العبد العبد العبد

کے لئے منظور ہے۔

[Signature]

Accepted
[Signature]

Yasir Yasir

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No 28 /ST

Dated 08/01/2018


To

The Inspector General of Police,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: **JUDGEMENT/ORDER IN APPEAL NO. 475/15 MR.MUHAMMAD IBRAR.**

I am directed to forward herewith a certified copy of Judgment/Order dated 01/01/2018 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


**REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.**

