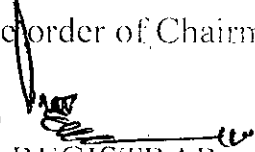


# FORM OF ORDER SHEET

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

Case No. - 613/2023

| S.No: | Date of order proceedings | Order or other proceedings with signature of judge  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1-    | 20/03/2023                | <p>The appeal of Mr. Zahcer Ahmad resubmitted today by Mr. Muhammad Saddiq Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman<br/><br/>REGISTRAR</p> |

**BEFORE HONORABLE SERVICE TRIBUNAL KHYBER  
PUKHTHUNWAH PESHAWAR.**

**Zaheer Ahamad**

**VERSUS**

**The Govt of Khyber Pakhtunkhwa Peshawar and other.**


**Sir, Objection raised by this hounrabal tribunal has been removed according to law.**

1. Check list has been attached with the appeal.
2. Index has been attached with the appeal.
3. Affidavit has been attested.
4. Addresses of the parties have been completed.
5. Annexes of appeal also attested.
6. Appeal also marked and flagged accordingly.
7. Contact number of appellant and council make available and write down in the appeal.
8. And annexure of appeal also make and write in sequence.
9. Memorandum of appeal got signed by council and appellant
10. The authority who passes the impugned order arrayed the party.
11. Three copies of /sets of appeal completed all aspect has been submitted with the appeal.

***Note; annexure A is not available yet and not handed over to the appellant by the department tell yet.***

**Appellant:**


**Through**

  
**Muhammad Saddiq  
Advocate High Court**

**date = 20/3/2023**

02.01.2023

None present on behalf of the appellant. Notices be issued to appellant as well as his counsel and to come up for arguments on office objections on 16.02.2023 before the S.B.



(Salah-Ud-Din)  
Member (J)

16<sup>th</sup> Feb, 2023

Learned counsel for the appellant present.

Learned counsel for the appellant has at the very outset requested he would remove objection within a week positively. The office is directed to return the memo and grounds of appeal retaining the order sheets and observation of the Tribunal and the learned counsel shall resubmit within a week. To come up on ~~16.02.2023~~ before S.B.

~~16.02.2023~~  
28/02/2023  
f



(Kalim Arshad Khan)  
Chairman

28<sup>th</sup> Feb, 2023

Nobody is present on behalf of the appellant present.

Office is directed to return the memo and grounds of appeal because the office objection has not been removed so far.



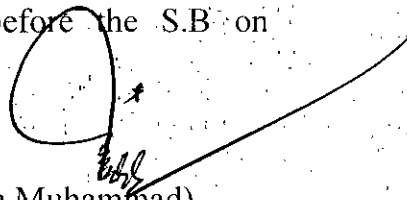
(Kalim Arshad Khan)  
Chairman

No. 869/ST  
Dated = 03-03-2023

19.09.2022

Nemo for the appellant.

Notice be issued to the appellant and his counsel to attend the court on the next date. Adjourned. To come up for arguments on office objection before the S.B on 21.10.2022, before

  
(Mian Muhammad)  
Member (E)

21<sup>st</sup> Oct., 2022


Because of strike of the Bar, this matter is adjourned to 30.11.2022. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.

  
(Kalim Arshad Khan)  
Chairman

30.11.2022

Appellant alongwith counsel present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for preliminary hearing on 02.01.2023 before S.B.

  
(Kalim Arshad Khan)  
Chairman

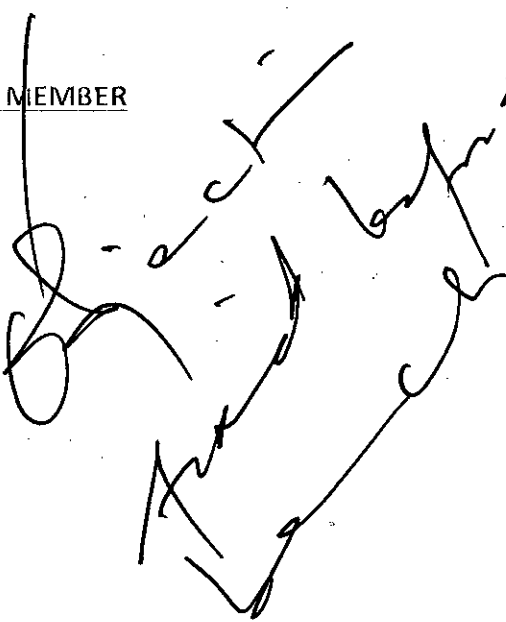
Respected Sir,

It is submitted that the present appeal was received on 20-07-2022 after thoroughly scrutinizing the same many deficiencies were found in it, which was returned to the counsel for the appellant for completion and resubmission within 15 days on 21-07-2022, but the appellant resubmitted the same on 03-08-2022, without removing objections no. 04, 07, 10, 11 and 12..

The appeal is submitted to your Honour under rule-7(c) of Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order, please.

  
4/8/22  
Assistant Registrar

WORTHY MEMBER


  
06/8/22

The appeal of Mr. Zaheer Ahmad son of Bashir Ahmad Ex-Constable no. 4792 of KKP Hazra Banch r/o Sikrdarpur District Haripur received today i.e. on 20.07.2022 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Index is not attached with the appeal.
- 3- Affidavit is not attested by the Oath Commissioner.
- 4- Addresses of respondents are incomplete.
- 5- Annexures of appeal are unattested.
- 6- Appeal has not been flagged/marked with annexures marks.
- 7- Contacts number/gmail address of appellant as well as counsel is not available.
- 8- Annexures of the appeal are not in sequence.
- 9- Memorandum of appeal is unsigned.
- 10- The authority whose order is challenged has not been arrayed as a necessary party.
- 11- Copy of appointment order mentioned in para-1 of the memo of appeal (Annexure-A) is not attached with the appeal.
- 12- Three copies/sets of the appeal along with annexures i.e. complete in all respect for respondents and one for each respondent may also be submitted with the appeal.

No. 2237 /S.T,

Dt. 21/07 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Saddiq Adv.  
High Court Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,

PESHAWAR

Services Appeal No. 613 /2023

Zaheer Ahmad

**VERSUS**

Govt of Kpk Peshawar etc

INDEX

| S.No | Description  | Annexure | Pages        |
|------|--|----------|--------------|
| 1.   | Service Appeal   |          | 1-3          |
| 2.   | Affidavit  |          | <del>4</del> |
| 3.   | Addresses of parties                                   |          | 4            |
| 4.   | Copy of F I R  | A        | 5            |
| 5.   | Copy of the dismissal order dated 11/02/2022           | B        | 6            |
| 7    | Copy of charge sheet                                   | C        | 7            |
| 8    | Copy of show cause notice                              | D        | 8            |
| 8.   | Copy of Departmental appeal and order dated 20/04/2022 | E & F    | 9-10         |
| 9.   | Wakalat Nama   |          | 11           |

Appellant

Through

*Muhammad*

Muhammad saddiq advocate high  
court Peshawar

Mob-0332-9353224.

1

**BEFORE THE HONORABLE SERVICE TRIBUNAL**

**KPK PESHAWAR**

*Appeal NO # 613/2023*

Zaheer Ahmad S/O Basheer Ahmad Ex-Constable No.4792 of KPK  
Hazara Banch R/O Sikardedpura District Hari Pure.

Appellant.....

**V E R S U S**

1. IGP Khyber Pakhtunkhwa Central Police Office Peshawar.
2. Commandant FRP Khyber Pakhtunkhwa Peshawar.
3. Superintend of Police FRP Hazara Region Abbottabad.

Respondents.....

**APPEAL U/S 4 OF KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR AGAINST THE IMPUGNED ORDER  
DATED 11.02.2022 WHEREBY THE APPELLANT AWARDED  
MAJOR PENALTY OF DISMISSAL FROM SERVICE.**

Respectfully Sheweth:-

Appellant submits as under.

1. That the appellant appointed in the said department.  
(Copy of appointment order is Annex -A).
2. That appellant is a dutiful person and never give any chance to  
complaint to his high ups.
3. That the appellant arrested an accused and recover narcotics and  
lodge FIR against namely Muhammad Tariq s/o Fazal Ghani R/O  
charsadda in the case FIR no .304.



9

dated 19-08-2021 U/S 9C CNSA of PS Ghazi. (Copy of FIR is Annex-B)

4. That the accused made allegation against the appellant that the appellant along with 2 other constable snatched amount more than 1 lac rupees, but this allegation has been made by the accused mentioned above after six months of the lodging of FIR, but the accused has not made this word before JMJC Peshawar or before the investigation officer of police meaning thereby the total story is baseless and concocted against the appellant.
5. That due to reason the mentioned above the appellant awarded major penalty dismissal from service. (Copy of Dismissal order is Annex-C).
6. That the appellant also charged and awarded major penalty and also issued charge sheet against the appellant. (Copy of Charge Sheet is Annex-D)
7. That the final showcase notice also issued to the appellant. (Copy of Showcase notice is Annex-E)
8. That the appellant filed departmental appeal which was dismissed. (Copy of departmental appeal & order dated 20-04-2021 as Annex-F)
9. That the allegation is totally baseless against the appellant and there is no proof against the appellant.
10. That the appellant is requested for reinstated on the following ground.

(3)

Grounds:

1. That the order of the respondents against law and fact hence not tenable in the eye of law.
2. That the appellant is totally innocent and have not got any amount from any person.
3. That proper inquiry has not been conducted in the present case.
4. That no opportunity of personal hearing has not been given to the appellant.

*It is therefore humbly prayed that on acceptance of the present appeal the appellant may kindly be reinstated in service with all back benefits.*

*Zaheer Ahmad*

Dependent

0315-5344248

Appellant

Through

*Muhammad*

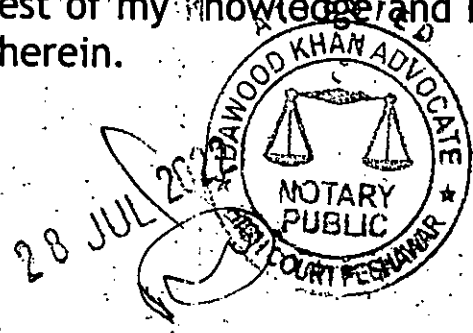
MUHAMMAD SADDIQ

Advocate High Court Peshawar

Mob-0332-9353224

AFFIDAVIT

I, Zaheer Ahmad S/O Basheer Ahmad Ex-constable No. 4792 of KKP Hazara Banch R/O Silardarpura District Haripur, solemnly declare an oath that all the contents of appeal are true and correct to the best of my knowledge and belief and nothing has been concealed herein.



Dependent

*Zaheer Ahmad*

4

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

Services Appeal No. \_\_\_\_\_/2022

Zaheer Ahamad

**VERSUS**

Govt of kpk etc

**ADDRESSES OF THE PARTIES**

**ADDRESS OF APPELLANT:**

Zaheer Ahamad S/o Basheer Ahmad Ex-constable No 4792 of kpk Hazara Bench R/o sikardar pura District Haripur Khyber Pakhtunkhwa.

**ADDRESSES OF RESPONDENTS:**

1. IGP Khyber Pakhtunkhwa Central Police Office Peshawar.
2. Commandant FRP Khyber Pakhtunkhwa Peshawar.
3. Superintendent of Police FRP HAZARA Region Abbottabad.

Through

Appellant

*Muhammad*

Muhammad saddiq  
Advocate,  
High Court Peshawar  
Cell no.03329353224.

ابتدائی اطلاعی رپورٹ

ابتدائی اور انجمن جرم قتل دست اندازی پولیس چارج شدہ اور دفعہ 154 نمبر شاہانہ خاں

|                               |                                    |
|-------------------------------|------------------------------------|
| غازی                          | میری پور                           |
| 41 عبت 304                    | 19/6 وقت 17:35 سے                  |
| 19/6 وقت 18 سے                | حاملہ کی طرح 19/6 وقت 18 سے        |
| سقیق الرحمن 511               | غلام غازی                          |
| 0343 9485185                  | 986 (برآمدگی 986) سزم حرم (رہ نما) |
| بیرا 2 قب پرست حاجت           | جنو - غلام 3/3 ولایت اڑیساک        |
| 0342 9699172                  | 5-1038921-13101                    |
| محمد طارق و وفیل غنی قوم نشان | واسم برصندہ قائم پورا              |
|                               | روٹین ڈاک                          |

ابتدائی اطلاع نیچے درج کرو۔ وقت صدر محرم مراد سرزم قبیلہ مندرجہ خانہ 2  
قبل شاہ زیب 885 موصول پور پوریل 9 محرم 14 غلام غازی امرور میں مور شاہ خان  
نعمت سفید دارھی رقبہ منری مشرف حاجت میں فوجی کی جانب سے بیدل بیت میرا تو باندھے بیوہ نے آنا  
پاکر جب امرتسار کی بنا پر جب خانہ جام ندراتی ال میلائی کیلئے بیت سے پھانسی بنا کر کھینچ کر ہر دو  
بدرہ اسیرک سے کپا کپٹ کر کے لڑا گیا جس پر پیدہ رفتی سلین شبیلی تھی برآمدہ ہر دو  
سرورہ نا عیبہ نکالی پوریل پوراہ برانے مخدوم شیخ 885 برآمدہ ہر دو 85 سزم  
نیرے سربر بیا کرتے رقبہ جام ندراتی سے فوجی حضور چیمبر مراد نے بیوہ اور نہی خیمہ میں بیوہ  
دو بار سزا نے ہر دو خیمہ پوریل میں کپا کرتے سرآمدہ حرم مذکورہ نے اسی ملکیت ندراتی دریا  
بر مذکورہ نے اسنام محمد طارق و وفیل غنی قوم نشان سزم جام ندراتی بندھا مذکورہ مرتصبا جسم آباد  
کے پکار جب خانہ امرتسار سے مراد برانے قائمی مخدوم دست ندراتی شاہ زیب 885 ارسال نکالی  
۹ جمعہ زلیحہ ۲۹ روز ۲۹ رقبہ رقبہ فوجی نہیں خواہ انوشی کین شاف یا حاجت  
بہر 49 مال قدرتی صفر طبرین نا فونڈہ رقبہ رقبہ سقیق ارثی 511 غلام غازی 19/6 کارور  
غلام آبدہ مراد برصندہ قوم پانہ قائم پور قتل کے جو مراد برصندہ نہیں حکمہ انوشی کین شاف  
رہا جائے ہر دو ندراتی کے

طارق عزیز  
ASHO PS GHANZI  
19 - 6 - 2021

ATTESTED  
28/7/22

## ORDER

This order will dispose off the departmental enquiry initiated against Constable Zaheer Ahmed No.4792/FRP, of Platoon No.100, District Abbottabad, reported by District Police Officer, Haripur vide his office letter No.10/PA, dated 04-01-2022.

During posting at PS Ghazi Haripur, he picked a citizen namely Muhammad Tariq s/o Fazal Ghani residence of Charsadda from near Panian By-Pass and registered a case vide FIR No.304, dated 19-06-2021 U/S 9-C/CNSA, PS Ghazi against him. He had also grabbed an amount of Rs.247380/- & Rs.100000/- from him. In this regard a complaint was submitted by the victim to the District Police Officer, Haripur, which was enquired into DSP, HQrs, Haripur, who found him guilty of gross misconduct.

A Proper departmental enquiry against the said official was entrusted to Mr. Muhammad Hanif, Inspector/RI, FRP, Lines Abbottabad.

He was served with charge sheet and statement of allegations but his reply did not satisfy the Enquiry Officer.

After enquiry he was served with final show cause notice and to appear before the undersigned to provide any cogent reasons in his defense if any, but his reply was found un-satisfactory.

Being a part of disciplined force his aforementioned act spoiled the good image of Police Department.

In view of above and on the recommendations of Enquiry Officer as well as District Police Officer, Haripur and gone through his previous record which shows nine bad entries and not a single good entry, I, Zahid-ur-Rehman, Superintendent of Police FRP, Hazara Region Abbottabad as a competent authority, awarded him major punishment of Dismissal from service under P.R 1975 with immediate effect.


Order announced.

sd  
Superintendent of Police, FRP,  
Hazara Region, Abbottabad.

No. /EC/FRP, dated, Abbottabad the, /2022.

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

1. Commandant, FRP, Pkhtunkhwa Peshawar.
2. Regional Police Officer, Hazara Range, Abbottabad.
3. District Police Officer, Haripur w/r to his office Memo: No. quoted above.
4. Accountant/RI, FRP, Lines /OHC FRP, Hazara Region Abbottabad.

  
ATTESTED  
28/7/2022



-6-

(7)

(31)

**THE SUPERINTENDENT OF POLICE, FRP, HAZARA REGION, ABBOTTABAD.**

Office #: 0992-921036  
Fax#: 0992-921478  
Email: [spfrphazara@gmail.com](mailto:spfrphazara@gmail.com)

**CHARGE SHEET**

I, Zahid-ur-Rehman, SP, FRP, Hazara Region, Abbottabad as competent authority charged you Constable Zaheer Ahmed No.4792, as follows.

As reported by District Police Officer, Haripur vide his office letter No.10/PA, dated 04-01-2022, during posting at PS Ghazi Haripur, you picked a citizen namely Muhammad Tariq s/o Fazal Ghani residence of Charsadda, near Panian By-Pass implicated in a heinous case FIR No.304, dated 19-06-2021 U/S 9-C/CNSA, PS Ghazi, and also took kept an amount of Rs.247380/- & Rs.100000/- from him. A complaint in this regard was moved by the victim to District Police Officer, Haripur, which was enquired into through DSP, HQrs, Haripur who found you guilty in his report/findings.

Your this attitude spoils the good image of Police department which is against the rules of disciplined force.

By the reasons of above, you appear to be guilty of gross misconduct under Police Rules 1975, and have rendered your self-labile for awarding major/minor punishment. 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, as the case may be.

Your written defence, if any should reach the enquiry officer/committee within the specified period, failing which it shall be presumed that you have nothing in your defense and in that case ex-parte action shall be taken against you.

A statement of allegation is enclosed.

*Zahid*  
Superintendent of Police, FRP,  
Hazara Region, Abbottabad.

*Mud v.*  
ATTESTED  
28/07/22

- 70 -

(8)cc

**OFFICE OF THE  
SUPERINTENDENT OF POLICE, FRP,  
HAZARA REGION, ABBOTTABAD.**

Office #: 0992-921036

Fax#: 0992-921478

Email: [spfrphazara@gmail.com](mailto:spfrphazara@gmail.com)

No. 267

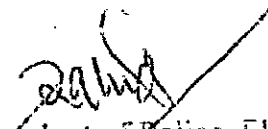
/EC/FRP, dated Abbottabad the 04/02/2022.


**FINAL SHOW CAUSE NOTICE**

Whereas you Constable Zaheer Ahmed No.4792, Platoon No.100, District Abbottabad, reported by District Police Officer, Haripur vide his office letter No.10/PA, dated 04-01-2022, during posting at PS Ghazi Haripur, you picked a citizen namely Muhammad Tariq s/o Fazal Ghani residence of Charsadda, near Panian By-Pass implicated in a heinous case FIR No.304, dated 19-06-2021 U/S 9-C/ENSA, PS Ghazi. and also took kept an amount of Rs.247380/- & Rs.100000/- from him. A complaint in this regard was moved by the victim to District Police Officer, Haripur, which was enquired into through DSP, HQrs, Haripur who found you guilty in his report/findings.

A Proper departmental enquiry was initiated against you and the Enquiry Officer Mr. Muhammad Hanif, Inspector/RI, FRP, Lines Abbottabad found you guilty in his findings for your this misconduct. Your this attitude spoils the good image of Police Department, which is against the rules of disciplined force.

In view of above, I Zahid ur Rehman, Superintendent of Police, FRP, Hazara Region Abbottabad served you with this final show cause notice. Your reply should reach this office within 7 days of the receipt of this notice, failing which it will be presumed that you have nothing to produce in your defense. Moreover at the same time also stated whether you want to heard in person.

  
Superintendent of Police, FRP,  
Hazara Region, Abbottabad

  
ATETSTED

28/2/022

(9)

## کمانڈنٹ صاحب فرنیچر یزوپولیس خیبر پختونخواہ پشاور

عنوان: ایپل براد بھالی سروس بحوالہ آرڈر نمبر 11/EC/FRP/306-11 مورخہ 11-02-2022 بجاریہ جناب

ایس پی صاحب FRP ہزارہ رینج لیٹ آباد۔

جناب عالی!

معروض خدمت ہوں کہ من سائل 2009 کو بطور کنسٹیبل بھرتی ہوا تھا۔ اس طرح سائل کی 1.2 سال سروس ہو چکی ہے۔

1- یہ کہ بدوران تعیناتی تھانہ غازی میں ایس ایچ او صاحب کی ہدایت پر ناکہ بندی پر معذور ہر دو کنسٹیبلان ڈسٹرکٹ ہری پور کے ہمراہ تھے۔ من سائل موٹر سائیکل رانیڈر ڈیوٹی پر موجود تھا اس دوران ایک شخص مشکوک حالت میں سامنے آ رہا تھا جس کو ہر دو کنسٹیبلان نے روک کر جامع تلاشی لی۔ بدوران تلاشی مذکور شخص سے ایک کلچرس کا پیکٹ برآمد ہوا جو کہ موقع پر ایس ایچ او تھانہ غازی کے حوالہ کر دیا گیا۔ شخص مذکورہ نے اپنا نام طارق ولد فضل غنی سکندہ چارسدہ بتلایا۔

2- یہ کہ مذکورہ شخص طارق کے خلاف بحوالہ مقدمہ علت نمبر 304 مورخہ 19-06-2021 جرم 9C-CNSA تھانہ غازی میں مقدمہ درج ہوا موقع پر مذکورہ سے نہ ہی کوئی رقم برآمد ہوئی اور نہ ہی کوئی دوسری قیمتی اشیاء برآمد ہوئی جس کو بعد از تفتیش سنٹرل جیل ہری پور بھیجوا یا گیا تھا۔

3- یہ کہ ملزم مذکورہ طارق کے عرصہ 6 ماہ بعد جیل سے رہائی کے بعد من سائل کو رقم لینے کا الزام لگایا جو کہ سراسر جھوٹ پر مبنی ہے۔ اگر مذکورہ ملزم اتنی بڑی رقم موقع پر دیتا تو ممکن ہے ایس ایچ او صاحب یا دیگر دو کنسٹیبلان ڈسٹرکٹ پولیس مذکورہ ملزم کو چھوڑ دیتے۔ مگر ملزم کے پاس کچھ بھی نہ تھا۔ صرف ملزم نے من سائل کو اور دوسرے کنسٹیبلان کو شہادت نہ دینے کو کہا تھا۔ مگر ہم نے ایسا نہیں کیا۔

4- یہ کہ سائل ایک نہایت غریب خاندان سے تعلق رکھتا ہے۔ سائل کے چھوٹے چھوٹے بچے ہیں۔ جن کی کفالت کا دوسرا کوئی ذریعہ معاش نہیں ہے۔ سائل مالی طور پر بہت ہی سخن پریشان ہے۔

5- یہ کہ سائل نے نہ کسی سے کوئی رقم لی اور نہ ہی رقم کا مطالبہ کیا ملزم سے صرف ایک کلچرس برآمد ہوئی تھی جس کا ملزم پر اسی وقت پرچہ دیا گیا تھا۔

6- یہ کہ جناب ایس پی صاحب FRP ہزارہ نے مذکورہ شخص کی درخواست پر انکوائری کرنے کے لیے انسپٹر مقرر کر کے انکوائری شروع کی جس پر چارج شیٹ جاری کی گئی چارج شیٹ کا جواب دینے پر سائل کو فائنل شوکانہ نوٹس جاری ہوا جس کا جواب بروقت مناسب دیا گیا۔ مگر پھر بھی جب ایس پی صاحب نے بحوالہ آرڈر نمبر 306-11/EC/FRP مورخہ 11-02-2022 کو من سائل کو سروس سے برخاست کیا گیا۔

7- لہذا بذریعہ ایپل استدعا کی جاتی ہے کہ سائل کی غربت اور لاچارگی کو مد نظر رکھتے ہوئے سائل کو سروس پر دوبارہ بحال کرنے کا حکم صادر فرمایا جائے۔

المرقوم: 05-03-2022

Zahoor Ahmad

آپ کے تابیدار ایکس کنسٹیبل ظہیر احمد RP/4792 ہزارہ رینج لیٹ آباد حال سکندر پور ضلع ہری پور۔

موبائل نمبر 0345-9227605

ATETSTED

28/7/2022



**ORDER**

This order will dispose of the departmental appeal preferred by Ex-  
Zaheer Ahmad No. 4792 of FRP Hazara Range, against the order of SP FRP  
Hazara Range, Abbottabad issued vide Order Endst. No. 306-11/EC/FRP, dated  
11.02.2022, wherein he was awarded major punishment of dismissal from service. The  
applicant was proceeded against on the allegations that as reported by District Police  
Officer, Haripur vide his office letter No. 10/PA, dated 04.01.2022 that the applicant  
while posted at Police Station Ghazi Haripur, he picked/arrested a citizen namely  
Muhammad Tariq S/o Fazal Ghani residence of Charsadda from near Panian bypass,  
which a criminal case vide FIR No. 301, dated 19.06.2021 U/S 9-C/CNSA, at Police  
Station Ghazi was registered against him. The DPO further reported that the applicant  
has also received grab an amount Rs. 247380/- & 100000/- from him.

However, subsequently the alleged accused (Muhammad Tariq) submitted  
an complaint against the applicant alongwith other police officer before the District  
Police Officer, Haripur, which was enquired through DSP HQrs, Haripur, who found him  
guilty of charges leveled against him.

However, later on proper departmental proceedings were initiated against  
him as he was issued Charge Sheet alongwith Summary of Allegations and Inspector  
Muhammad Hanif RI FRP Line Abbottabad was nominated as Enquiry Officer to  
conduct proper enquiry against him. After completion of enquiry the enquiry officer  
submitted his findings, wherein he reported that the delinquent constable submitted  
reply of Charge Sheet, but his reply was found unsatisfactory. The enquiry officer  
further observed that the accused constable is being a part of disciplined force his  
aforementioned act definitely defamed the image of police department.

Upon the finding of Enquiry Officer, he was issued Final Show Cause  
Notice, to which he replied but his reply was found unsatisfactory. He was given ample  
opportunity of personal hearing in orderly room, but he willfully failed to appear before  
the competent authority.

Keeping in view the above narrated facts and other material available on  
record, he was awarded major punishment of dismissal from service vide Order Endst;  
No. 306-11/EC/FRP dated 11.02.2022.

Feeling aggrieved against the impugned order of SP FRP Hazara Range,  
Abbottabad, the applicant preferred the instant appeal. The applicant was summoned  
and heard in person in Orderly Room held on 14.04.2022.

During the course of personal hearing, the applicant failed to present any  
justification regarding his innocence. From perusal of enquiry file it has been found that  
the allegations were fully established against him by the Enquiry Officer during the  
course of enquiry. Thus the applicant has been found to be an irresponsible person in  
utter disregard the discipline of the force. It is settled proposition of law that law helps  
the diligent and not indolent. Therefore any leniency or complacency would further  
embolden the accused officer and impinge upon adversely on the overall discipline and  
conduct of the force. There doesn't seem any infirmity in the order passed by the  
competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, I, Commandant FRP, Khyber  
Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the  
appeal, therefore, the same is rejected and filed being meritless.

Order Announced







Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa Peshawar

No. 10/PA, dated Peshawar, he 20/04/2022

Copy of above is forwarded for information and necessary action to the  
SP FRP Hazara Range, Abbottabad. His Service Record alongwith D-file sent herewith.

*Amad*  
ATETSTED  
28/7/022

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|--|-------|--|---|
| قیمت<br>50 روپے  | 30559 |   |  |
| ایڈوکیٹ: محمد سعید امجدی<br>بار کونسل ایسوسی ایشن نمبر: 76-09<br>رابطہ نمبر: 0332-911222 |       |  |   |

|  |                       |
|--|-----------------------|
| منجانب: <u>ایڈوکیٹ</u>   | دعویٰ: <u>سروس</u>    |
|  | علت نمبر: _____       |
|  | مورنہ: <u>26/7/22</u> |
|  | جرم: _____            |
|  | تھانہ: _____          |
| <b>باعث تحریر آنکہ</b>   |                       |

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ  
 آن مقام محمد سعید امجدی کو وکیل مقرر  
 کر کے قرار 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 برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائر کر کے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ 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 کوئی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا سناختہ پر داخستہ منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے

المقوم: محمد سعید امجدی  
 PESHAWAR BAR ASSOCIATION  
 KHYBER PAKHTUNKHWA  
 واقعہ نمبر: 2022/7/26

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

Zahra Zahra