

FORM OF ORDER SHEET

Court of _____

Appeal No. 1417/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1.	2	3
1-	26/06/2023	The appeal of Mr. Jahangir Khan resubmitted by Mr. Arsalan Sareer Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on

By the order of Chairman



REGISTRAR

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 1417 /2023

Ex-Constable Jehangir Khan (Appellant)

Versus

Government of KPK and others (Respondents)

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Appellant

Through,



Arsalan Sareer

Advocate High Court

&

Rizwan Rasheed Siddiqui

Advocate

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTYNKHWAS PESHAWAR

Service Appeal No. 1417 /2023

Ex-Constable Jehangir Khan No: 1176 of FRP HQrs S/O Syed Sharafat Hussain

R/O Thangi Mulhala Chandani Chowk Teshil Tangi District Charsadda

Appellant

VERSUS

1. Government of KhyberPakhtynkhwa through Commandant FRP Peshawar
2. Deputy Commandant FRP KhyberPakhtynkhwa Peshawar
3. IGP Head quarters KhyberPakhtynkhwa Peshawar
4. Additional IGP Head quarters KhyberPakhtynkhwa
5. DIG Head quarters FRP KhyberPakhtynkhwa Peshawar
6. DSP Head quarters KhyberPakhtynkhwa Peshawar
7. SP FRP D.I khan Range KhyberPakhtynkhwa

Respondents

Filed today

at Peshawar

APPEAL UNDER SECTION 4 OF
KHYBERPAKHTYNKHWAS SERVICE
TRIBUNAL ACT 1974 AGAINST THE
IMPUGNED ORDER NO:265-66/PA DATED:
03/02/2022 OF RESPONDENT NO: 2 VIDE
WHICH THE APPELLANT WAS AWARDED
MAJOR PUNISHMENT OF REMOVAL
FROM SERVICE TO THE APPELLANT AND
THE IMPUGNED ORDER NO :S/1330-
35/23 DATED: 15/05/2023 VIDE WHICH
THE APPEAL OF THE APPELLANT WAS
DISMISSED.

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Respectfully Sheweth,

The appellant humbly submits as under:

1. That the appellant was appointed as constable at Frontier Reserved Police (FRP/HQrs) and from that day he is regularly performing his duty and with all his energy and zeal of patriotism.
2. That the appellant was performing his duty in the police line Peshawar and vide mud report No. 16 dated 08-12-2021 got leave for pursuing the treatment of his father as was suffering from stroke and got paralysis, subsequently admitted in the hospital.
3. That appellant father could not survive and died subsequently due to the said illness and the appellant remained at home for ceremonials of his father's and due to said grief the appellant remain on home.
4. That the appellant being sole supervisor of his family and bears all the responsibility and looking his bereaved family and telephonically informed the department about the non-attendance of this duties and the appellant remain at home.
5. That appellant got transfer on 8-12-2021 through Endst, No. 2238-43/PA as the appellant remain at home due to above reason and having no knowledge of said order in regard to the transfer of appellant.
6. That the respondents issued a show cause notice vide notice No. 82/PA dated 14-01-2022 and subsequently an inquiry has been initiated vide order No. 262-66/PA dated 03-02-2022 the inquiry was

conducted by the respondent No. 4 on 12-01-2022, the same resulted in major penalty of removal from service against the appellant. (Copy Attached)

- 7. That appellant filed a departmental appeal which was dismissed vide order No. 307-09/PA dated 20-04-2022. (Copy Attached)
- 8. That the appellant challenges the same in revision petition which was also dismissed vide order No. 1330-35/23 dated 15-05-2023 which was communicated vide dairy No. 4410 dated 17-05-2023 which was received by the appellant on 19-05-2023. (Copy Attached)
- 9. That the appellant being aggrieved from the said orders approaches this Honorable Tribunal in the instant appeal on the following amongst grounds:-

GROUND:

- A. That the impugned orders issued by the respondents are illegal, against the law and against the fact and are liable to be set aside.
- B. That the charges level against the appellant are illegal based on presumptions, fanciful and the result of misuse of authority.
- C. That the respondent's department conducted the inquiry against the appellant in hip-hazard manner and no explanation notice was served in regard to charges level against the appellant, hence, the same are not tenable in the eye of law.

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- D. That the respondents has never served any show cause notice, charge sheet and statement of allegations and mandatory proceeding for serving the appellant through prescribe manner which resulted in condemning the appellant unheard.
- E. That no opportunity of personal hearing defending his right and giving any plausible explanation which is evident from the record of the case, hence, the inquiry so conducted and the finding so delivered and subsequent removal is the result of miss carriage of justices, which is against the rights of the appellant.
- F. That the respondents has not adopted the mandatory proceeding of any explanation by virtue of any summon, notice and other mode of information, which the need of mandatory proceeding, hence, the inquiry so conducted, and the penalty awarded is liable to be struck down on this score alone.
- G. That the impugned inquiry and subsequent orders are unreasonable without any justification and against the facts and record of the case and the penalty so awarded is the result of illegality and irregularity, hence, liable to be set aside.
- H. That in the instant inquiry and subsequent award of major penalty no reasons has been forwarded for the major punishment so awarded and if the absence so true is converted to a period without pay, the award of major penalty is not justified according to law and rules.

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- I. That the appellant has not been treated in accordance with law and has been discriminated in purview of Article 4 and 10 of the constitution of Islamic Republic of Pakistan, 1973.
- J. That the appellant may kindly be allowed to add/relay on any other ground at time of arguments.

It is, therefore, most humbly prayed that on acceptance of the instant appeal the orders dated 03-02-2022, 20-04-2022 & 15-05-2023 may please be set aside and the inquiry so conducted by the department may also be declared illegal and unlawful, and the appellant may please be re-instated with all back benefits.

Any other relief deem fit in the circumstances of the case may kindly be granted if the appellant found entitle in the large interest of justice.

Appellant

Through

Arsalan Sareer

Advocate High Court

&

Rizwan Rasheed Siddiqui

Advocate

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. _____ /2023

Ex-Constable Jehangir Khan (Appellant)

Versus

Government of KPK and others (Respondents)

AFFIDAVIT

I, Ex-Constable Jehangir Khan No: 1176 of FRP HQrs S/O Syed Sharafat Hussain R/O Thangi Mulhala Chandani Chowk Teshil Tangi District Charsadda, do hereby solemnly affirm and declared on Oath that the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from the Hon'able Court.

Deponent

CNIC: 17102-5966649-1

Cell: 0301-5946473



Identified by

ARSALAN SAREER

Advocate High Court

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTYNKHWAW PESHAWAR

Service Appeal No. _____ /2023

Ex-Constable Jehangir Khan (Appellant)

Versus

Government of KPK and others (Respondents)

ADDRESSES OF PARTIES

Appellant:

Ex-Constable Jehangir Khan No: 1176 of FRP HQrs S/O Syed Sharafat
Hussain
R/O Thangi Mulhala Chandani Chowk Teshil Tangi District Charsadda

Respondents

1. Government of KhyberPakhtynkhwa through Commandant FRP Peshawar
2. Deputy Commandant FRP KhyberPakhtynkhwa Peshawar
3. IGP Head quarters KhyberPakhtynkhwa Peshawar
4. Additional IGP Head quarters KhyberPakhtynkhwa
5. DIG Head quarters FRP KhyberPakhtynkhwa Peshawar
6. DSP Head quarters KhyberPakhtynkhwa Peshawar
7. SP FRP D.I.khan Range KhyberPakhtynkhwa

Appellant

Through



Arsalan Sareer

Advocate High Court

&

Rizwan Rasheed Siddiqui

Advocate



Annex A

OFFICE OF THE
DEPUTY COMMANDANT
FRONTIER RESERVE POLICE
KHYBER PAKHTUNKHWA, PESHAWAR

Email: comdtfrpofficial@gmail.com
Ph: No. 091-9210945 Fax No. 091-9214114

No. 82 /PA, Dt: 14 / 08 / 2022.

FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

I, Deputy Commandant FRP / K.P.K as Competent Authority do hereby serve you the following constables of FRP HQrs: Peshawar, transfer on complaint basis Bannu and DIKhan ranges, but they deliberately absented themselves from lawful duties. In this regard they were issued charge sheet and DSP FRP HQrs was appointed to conduct inquiry in to the matter.

Sno	Name & No.	FROM	To	Absence from
1	Syed Raheem 466	FRP HQrs:	FRP Bannu	From 8-12-2021 till to date
2	Kiramat No. 998	FRP HQrs:	FRP Bannu	From 30-11-2021 till to date
3	Jahangir No. 1176	FRP HQrs:	FRP DIKhan	From 8-12-2021 till to date
4	Zeeshan No.2151	FRP HQrs:	FRP DIKhan	From 06-12-2021 till to date

(2) Therefore, I, Deputy Commandant FRP/K.P.K as Competent Authority has tentatively decided to impose upon you Major/Minor penalty including dismissal from service under the said Rules.

(3) You are, therefore, required to Show Cause as to why not the aforesaid penalty should not be imposed upon you.

(4) If no reply to this Show Cause Notice is received within (07) days of it delivery in the normal course of circumstances, it shall be presumed that you have no defense to put in and consequently ex-parte action shall be taken against you.

Deputy Commandant
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar

جناب عالی!

بحوالہ بشمولہ انکوائری کاغزات بنام کنسٹیبلان سید رحیم نمبر 466، کرامت نمبر 998، ڈیٹا نمبر 2151 اور جہانگیر نمبر 1176 معروض خدمت ہوں کہ مذکورہ بالا کنسٹیبلان بحوالہ آرڈر نمبر OASI/43-2238 مورخہ 08-12-2021 پر ایف آر پی ہیڈ کوارٹر سے ایف آر پی DIKhan, Bannu رٹج آن کیپلنٹ تبدیل میں ہو چکے ہیں۔ جنمیں سے کنسٹیبل سید رحیم نمبر 466، کنسٹیبل جہانگیر نمبر 1176 بحوالہ مد 08 مورخہ 08-12-21، کنسٹیبل کرامت نمبر 998 بحوالہ مد 56 روزنامچہ 21-11-30 اور کنسٹیبل ڈیٹا نمبر 2151 بحوالہ مد 31 مورخہ 21-12-06 سے بدستور غیر حاضر ہیں اور مذکورین کو بار بار حاضری ارواگئی کی متعلق اصلاح دی گئی۔ نظمد متذکرہ جناب ڈپٹی مائڈنٹ صاحب ایف آر پی کے پی نے مذکورین کے خلاف چارج شیٹ و سمری آف اینیشن جاری کر کے کاغزات بغرض انکوائری من DSP-HQrs ایف آر پی پشاور کو حوالہ ہوئی۔

دوران انکوائری کنسٹیبلان سید رحیم نمبر 466 اور کرامت نمبر 998 پر مورخہ 27.12.2021 کو، جہانگیر نمبر 1176 پر مورخہ 29/12/21 کو اور کنسٹیبل ڈیٹا نمبر 2151 پر مورخہ 28-12-21 کو بذریعہ DFC ایف آر پی ہیڈ کوارٹر چارج شیٹ حسب ضابطہ تقسیم کی گئی ہے لیکن مذکورین نے تاحال کسی قسم کے تحریری جواب پیش نہیں کئے ہیں۔

محرر ایف آر پی ہیڈ کوارٹر سے مذکورہ کنسٹیبلان کے بابت تحریری رپورٹ حسب من گئی جس کے مطابق کنسٹیبلان سید رحیم نمبر 466، جہانگیر نمبر 1176 بحوالہ مد 08، روزنامچہ 21-12-11 از مورخہ 21-12-08 سے اور کرامت نمبر 998 بحوالہ مد 56 روزنامچہ 21-11-30 سے بر مطابق ریکارڈ روزنامچہ FRP/HQrs سے بدستور غیر حاضر ہیں جبکہ کنسٹیبل ڈیٹا نمبر 2151 نے مورخہ 21-12-23 پر حاضری کر کے بحوالہ OASI/43-2238 مورخہ 21-12-08 پر آن کیپلنٹ میں ایف آر پی DIKhan رٹج تبدیل ہو چکا ہے۔ مذکورہ کو بحوالہ مد 24 روزنامچہ 21-12-23 پر ایف آر پی DIKhan رٹج روانہ کیا گیا ہے۔ (رپورٹ ہمراہ لف ہے)

اندریں سلسلہ کنسٹیبل ڈیٹا نمبر 2151 جو کہ بحوالہ مد 24 روزنامچہ 21-12-23 ایف آر پی DIKhan رٹج کو روانہ کیا گیا ہے کے بابت پتہ برادی کرنے کے لئے امجد محترم FRP/DIK رٹج سے بذریعہ کنٹرول روم رابطہ کیا گیا جس نے بتلایا کہ مذکورہ کنسٹیبل نے اپنی حاضری کی رپورٹ تاحال نہیں کی ہے اور بدستور غیر حاضر ہے۔ (رپورٹ غیر حاضری ہمراہ لف ہے)

جناب عالی!

درج بالا حالات و ریکارڈ کو مد نظر رکھتے ہوئے اس نتیجے پر پہنچا ہوا ہے کہ کنسٹیبلان سید رحیم نمبر 466 اور کرامت نمبر 998، بحوالہ لیٹر آرڈر نمبر OASI/43-2238 مورخہ 08-12-2021، FRP/HQrs سے ایف آر

Bannu ریج آن کیپیٹ میں پر تبدیل ہو چکے ہیں۔ کنسٹیبلان ڈیٹان نمبر 2151 اور جہانگیر نمبر 1176 بحوالہ
لیٹر آرڈر نمبری OASI/43-2238 مورخہ 08-12-2021 پر FRP/HQrs سے ایف آر پی DIKhan
ریج تبدیل ہو چکے ہیں۔ مذکورین بالا کنسٹیبلان میں سے کنسٹیبل سید رحیم نمبر 466، کنسٹیبل جہانگیر نمبر 1176
بحوالہ مد 08 روزنامہ 11.12.2021 از مورخہ 08-12-21 سے، کنسٹیبل کرامت نمبر 998 بحوالہ مد 56
روزنامہ 30-11-2021 سے روزنامہ FRP/HQrs پشاور میں تاحال بدستور غیر حاضر ہیں۔ جبکہ کنسٹیبل ڈیٹان
نمبر 2151 نے ایف آر پی کوارٹر پشاور میں حاضری کر کے بحوالہ مد 24 روزنامہ 23.12.21 پر ایف آر پی
DIKhan ریج روانہ کیا جا چکا ہے لیکن بمطابق محرر ایف آر پی DIKhan کنسٹیبل مذکورہ نے DIKhan ریج میں
تاحال حاضری نہیں کی ہے اور بدستور غیر حاضر ہیں۔

چونکہ کنسٹیبلان سید رحیم نمبر 466 اور کرامت نمبر 998 کو مورخہ 27.12.2021 پر، جہانگیر نمبر
1176 پر مورخہ 29/12/21 کو اور کنسٹیبل ڈیٹان نمبر 2151 پر مورخہ 28-12-21 کو بڑیوہ DFC ایف
آر پی ہیڈ کوارٹر چارج شیٹ حسب ضابطہ تقسیم کی گئی ہے لیکن مذکورین نے تاحال کسی قسم کے تحریری جواب پیش نہیں کئے
ہیں۔ مذکورین نے نہ ہی حاضری کی ہے اور اپنی ذمہ داری سے بدستور غیر حاضر ہیں۔ ایس یہ معلوم ہوتا ہے کنسٹیبلان مذکورین
نذری کرنے کے خواہاں نہیں ہیں۔ لہذا مذکورہ بالا 04 نفر کنسٹیبلان کو Major Punishment دینے کی سفارش
کی جاتی ہے۔

رپورٹ گزارش ہے۔

DSP

ایف آر پی پشاور

No.

10/11

Issue Final Show
Cause notice to the
Abdullah named Fes
S. Rahim, Karamat, Jehanگیر
and Fes Sham.

[Handwritten Signature]

12-01-22

O.R.D.E.R.

Annex 'C'

(11)

This order will dispose of the Departmental Inquiry against Constable Jehangir No.1176 of FRP/HQrs: Peshawar.

Brief facts of the case are that Constable Jehangir No.1176 of FRP HQrs: Peshawar was transferred to FRP DIKhan Range vide this office order No. 2238-43/PA dt: 08-12-2021 but he absented himself from lawful duty with effect from 08.12.2021 till to date without taking any leave/permission of the Competent Authority. In this regard, formal departmental proceedings were initiated and he was issued Charge Sheet alongwith Statement of allegations and DSP FRP HQrs Peshawar was nominated as Inquiry Officer. After inquiry, the Inquiry Officer submitted his findings wherein he reported that the said constable badly failed to submit his written reply within stipulated time period and recommended for major punishment. Upon the finding of Inquiry Officer, he was issued Final Show Cause Notice, to which he again failed to submit any reply.

Later on the said constable has given an ample opportunity of personal hearing in OR but he does not succeed to appear before the undersigned.

After the perusal of his service records tabulated below, it came to light that the said constable is not taking interest in his duties:

S.no	Year	days	Punishment
1	2012	368 days	Removal from service later on Re-instate in service 150 days treated as Medical leave 218 days without pay. Awarded Minor punishment stoppage of 02 Annual increments without cumulative effect.
2	2018	36 days	36 days without pay without pay 01 increments stoppage with cumulative effect.
3	2019 +2020	285 days	Removal from service later on Re-instate in service 120 days treated as full pay. 165 days on half pay.

Keeping in view the recommendations of both the inquiry Officers and his previous punishment records, it has come clear crystal that the defaulter constable is not taking interest in his lawful duties therefore I, **Jehan Zeb Khan Barki**, Deputy Commandant FRP Khyber Pakhtunkhwa Peshawar being a competent authority is hereby awarded Major punishment of **Removal** from service to Constable Jehangir No.1176 of FRP HQrs: Peshawar under Police Rules 1975 amended 2014 with immediate effect. However his absence period is treated as without pay.

Order Announced.

Deputy Commandant,
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar

No. 265-66 /PA dated Peshawar, the 03/02, 2022.

- Copy to the:-
1. Worthy Commandant, FRP Khyber Pakhtunkhwa Peshawar for information please.
 2. Superintendant of Police FRP DIKhan Range.

ORDER

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Annex D

This order will dispose of the departmental appeal preferred by Ex-constable Jehangir No. 1176 of FRP HQrs; against the order of Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar issued vide Order Endst; No. 265-66/PA, dated 03.02.2022, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he was transferred to FRP DI Khan Range vide office order Endst; No. 2238-43/PA, dated 08.12.2021, but he failed to report arrival at his new place of posting and remained absent from his lawful duty with effect from 08.12.2021 till the date of his removal from service i.e 03.02.2022 for total period of 01 month 25 days, without any leave or prior permission of the competent authority.

In this regard, formal departmental proceedings were initiated against him as he was issued Charge Sheet alongwith Statement of Allegations and DSP FRP HQrs; was nominated as Enquiry Officer to conduct proper enquiry against him. After completion of enquiry, the Enquiry Officer submitted his finding report, wherein he reported that the above named constable badly failed to submit his written reply of Charge Sheet within stipulated period and recommended him for major punishment.

Upon the finding of Enquiry Officer, he was issued Final Show Cause Notice, to which he again failed to submit any reply. Later on, he was given an ample opportunity for defense in the shape of personal hearing in orderly room, but he failed to avail this opportunity.

Keeping in view the above narrated facts and other material available on record, he was awarded major punishment of removal from service vide Order Endst; No. 265-66/PA, dated 03.02.2022.

Feeling aggrieved against the impugned order of Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar, 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 to his prolong absence. From perusal of enquiry file it has been found that the allegations were fully established against him by the Enquiry Office during the course of enquiry. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force. Therefore any leniency or complacency would further embolden the accused officer and impinge upon adverse 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. 307-09 /PA, dated Peshawar the 20/04/2022.

- Copy of above is forwarded for information and necessary action to the
1. Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar.
 2. SP FRP DI Khan Range, DI Khan. His Service record alongwith D-file sent herewith
 3. Ex-constable Jehangir No. 1176 S/O Sayed Sharafat Hussain R/o Chandani Chow Police Station Tangi, District Charsadda.

عنوان:- درخواست بمراد بحالی سروس

جناب عالی:

گزارش ہیکہ FRP/HQrs میں بطور کنسٹیبل بھرتی ہوا تھا اور ڈیوٹی سرانجام دے رہا تھا۔ دوران ڈیوٹی سائل کو گھریلوں مسائل درپیش ہوئی جسکی وجہ سے سائل محکمہ ہذا سے بوجہ غیر حاضری بحوالہ کوڈ نمبر 66/PA-265 مورخہ 02-03-2022 پر خاست ہوا۔ سائل نے جناب کمانڈنٹ صاحب FRP کو بحالی سروس کیلئے درخواست / اپیل جمع کروائی جو کہ بحوالہ آڈر نمبر 307-09/PA مورخہ 30-04-2022 کو خارج کر دی گئی، من سائل ایک غریب و شریف خاندان سے تعلق رکھتا ہے گھر کا واحد سربراہ ہے اور سائل اپنے بوڑھے والدین کا واحد سہارا ہے۔ والدین اکثر اوقات بیمار رہتے ہیں جسکی علاج معالجہ پر کافی رقم خرچ ہوتی ہے دیگر کوئی معاش نہیں۔

لہذا آپ صاحبان سے بذریعہ درخواست التماس ہے کہ سائل کی درج بالا مفلسی اور لا چاری کو مد نظر رکھتے ہوئے دوبارہ اپنی نوکری پر بحال کرنے کے احکامات صادر فرما کر مشکور فرمائیں۔ سائل دعا گو رہیگا۔

عین نوازش ہوگی

الغاض

آپکا تابع الحکم سابقہ کنسٹیبل جہانگیر نمبر 1176 FRP/HQrs پشاور

0300-3696124--0307-3540554



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

14

"E"

Annex

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted **Ex-FC Jehangir No. 1176**. The petitioner was awarded major punishment of removed from service by Deputy Commandant, FRP, Khyber Pakhtunkhwa, Peshawar vide order Indst: No. 265-66/PA, dated 03.02.2022 on the charges that he was transferred to FRP Dikhan Range vide order Indst: No. 2238-43/PA, dated 08.12.2021, but he failed to report arrival at his new place of posting and remained absent from duty w.e.f 08.12.2021 till date of removal from service i.e. 03.02.2022 for total period of 01 month & 25 days. His appeal was rejected by Commandant, FRP, KPK vide order Indst: No. 307-09/PA, dated 20.04.2022.

Meeting of Appellate Board was held on 18.04.2023 wherein petitioner was heard in person. Petitioner contended that he had family issues.

Perusal of enquiry papers reveals that the allegations leveled against the petitioner have been proved. During hearing, petitioner failed to advance any plausible explanation in rebuttal of the charges. He was twice removed from service on the charges of absence in the year 2012 and 2019. The Board sees no ground and reasons for acceptance of his petition; therefore, the Board decided that his petition is hereby rejected.

Sd/-

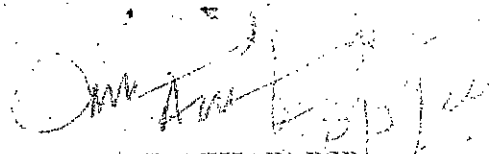
SABIR AHMED, PSP

Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

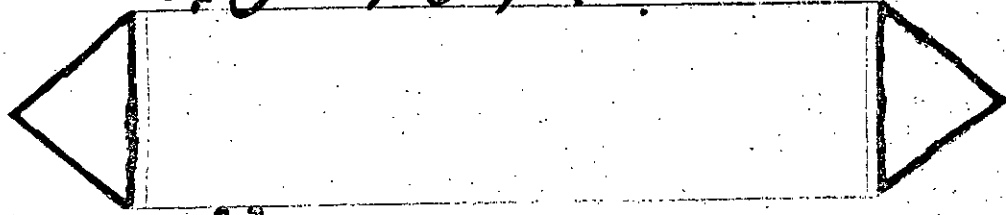
No. SI/ 1330-35/23, dated Peshawar, the 15-05 2023.

Copy of the above is forwarded to the:

1. Commandant FRP Khyber Pakhtunkhwa, Peshawar. The Service Record alongwith D. file of the above named Ex-FC received vide your office Memo: No. 5286/SI Legal, dated 27.06.2022 is returned herewith for your office record.
2. Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: E-IV CPO Peshawar.


(MUTIAMMAD AZHAR) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

بعد االت جناب سرورس ٹرانسپورٹیشن اور



23 د 20

ٹینٹیل برائے ٹرانسپورٹیشن اور ٹرانسپورٹیشن

موردہ
تقدیم
دہائی
م

باعث تحریر آئنگے

ایڈووکیٹ

پشاور کے اتر اکر کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز

مقدمہ مشورہ عنوان بالا میں اپنی طرف سے واسطے بیرونی و جناب رہی و کل کارروائی مختلفہ
آن مقام مقرر کر کے اتر اکر کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز
یکل صاحب کو رائی نامہ نمبر ۱۹۱۹ و تقریر حالت و فیصلہ برحسب دینے جو اب دہائی اور اتر اکر دہائی اور
بہ صورت ڈگری کرنے اجراء اور وصولی چیک، وردیہ اور عرضی دہائی اور نو دست ہر قسم تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیرونی یا ڈگری یا طرفہ یا اپیل کی ہر امداد اور منسوخی
نیز دائر کرنے اپیل گزارنی و نظر ثانی و بیرونی کرنے کا اختیار ہوگا۔ از بسورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو کبھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا استعمال
پر داخلہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوا سے مقدمہ کے سبب سے ہوا ہوگا۔
کوئی تاریخ کی کسی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ بیرونی
ذکورہ کریں۔ لہذا اذکالت نامہ لکھنا یا کہ سند ہے۔

19 جون 20

Accepted & Attached

Handwritten signatures

پشاور

assalansasees@gmail.com

Handwritten notes and signatures on the right margin

BC-19-1568

0315-6550006