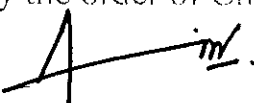


FORM OF ORDER SHEET

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

Appeal No. 1462/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/07/2023	<p>The appeal of Mr. Fazal Nabi presented today by Mr. Muhammad Irshad Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p>By the order of Chairman  REGISTRAR</p>

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

Service Appeal No: - 1462/2023

Fazal Nabi

(Appellant)

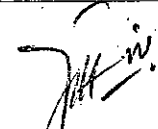
**VERSUS**


Provincial Police Officer Khyber Pakhtunkhwa at CPO Peshawar  
& others

(Respondents)

**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-6
2.	Affidavit		7
3.	Address of Parties		8
4.	Copy of Charge Sheet & Reply	"A"	9-10
5.	Copy of Order No O.B No 342 dated 24-03-2022 issued by Respondent No 4 / DPO Charsadda	"B"	11
6.	Copy of Departmental Appeal, Show cause notice along with Reply & Appellate Order dated 20/06/2022	"C"	12-15
7.	Copy of Application / Revision & Order No 1324-29/23 dated 15-05-2023 and Application filed by appellant.	"D"	16-18
8.	Other Documents	"E"	19-20
9.	WakalatNama		21

  
Appellant: Fazal Nabi  
Through

  
Muhammad Irshad Mohmand  
Advocate High Court  
Peshawar

Dated 10-07-2023

①

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

Service Appeal No: - 1462/2023

Fazal Nabi, (IHC No 698) Presently Constable at Police Station  
Tarnab District Charsadda KPK Peshawar (Appellant)

**VERSUS**

1. Provincial Police Officer Khyber Pakhtunkhwa at CPO  
Peshawar
2. Additional Inspector General of Police HQrs KPK Peshawar.
3. Regional Police Officer Mardan
4. District Police Officer Charsadda (Respondents)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED  
REVISIONAL ORDER DATED 15-05-2023 WHEREBY  
REVISION PETITION FILED BY THE APPELLANT HAS  
BEEN DISMISSED BY RESPONDENT NO 1 AND AGAINST  
THE APPELLATE ORDER DATED 20/06/2022 OF  
RESPONDENT NO.3 WHEREBY THE INITIAL IMPUGNED  
ORDER DATED 24-03-2022 ISSUED BY RESPONDENT NO 4  
/ DPO CHARSADDA OF REDUCTION IN PAY BY ONE  
STAGE HAS BEEN CONVERTED / ENHANCED TO  
REDUCTION IN RANK FROM HEAD CONSTABLE TO  
SUBSTANTIVE RANK OF CONSTABLE WHICH ARE  
ILLEGAL AGAINST THE LAW, FACTS AND INEFFECTIVE  
UPON THE RIGHTS OF APPELLANT, HENCE LAIBLE TO  
BE SET-ASIDE AND THE APPELLANT IS ENTITLED TO BE  
GRANTED HIS OWN RANK AS HEAD CONSTABLE WITH  
ALL BACK BENEFITS

---

**PRAYER:-**

On acceptance of this Service appeal, the impugned Revisional Office Order No 1324-29/23 dated 15-05-2023 issued by Respondent No 1 & impugned Appellate order No 4300/ES dated 20-06-2022 issued by Respondent No 3 as well as initial impugned Order No O.B No 342 dated 24-03-2022 issued by Respondent No 4 / DPO Charsadda be declared as illegal, unlawful, void ab-initio and are liable to be set aside and the Respondents be directed to grant the appellant his own rank as Head Constable with all back benefits

**Respectfully Sheweth:-**

The brief facts leading up to the filing of this Service Appeal are as under: -

1. That the Appellant was initially appointed as Constable in the Respondent Department on 30-01-1999 and was performing his duty with honesty and with the passage of time, the appellant was promoted as Head Constable in the year 2010 and has done his inter course in the year 2017 and presently performing his duty as Constable in Police Station Tarnab District Charsadda in Police Department
2. That while posting in the Police Station Prang District Charsadda, the Respondent No 4 / DPO Charsadda issued, an alleged charge sheet un-dated to the appellant regarding a complaint, to which the appellant duly filed his reply that the alleged complaint does not fall within the jurisdiction of police station Prang and the appellant duly inform the concerned Moharrir of Police Station Prang, that the matter falls within the jurisdiction of Police Station Sardheri Charsadda. **(Copy of alleged Charge Sheet & Reply is attach as Annex "A")**

3. That thereafter the Respondent No 4 / DPO Charsadda without issuing statement of allegation and without conducting detail inquiry as well as without issuing Final Show cause notice to the appellant, issued the impugned Office Order No O.B No 342 dated 24-03-2022 whereby punishment of Reduction in pay by one stage has been imposed on the appellant. **(Copy of Order No O.B No 342 dated 24-03-2022 is attach as Annex "B")**
4. That the appellant preferred departmental appeal against the impugned order dated 24-03-2022 before the appellate authority / Respondent No.3 / RPO Mardan, whereon Show cause notice for enhancement of penalty was issued to the appellant, to which the appellant also filed his reply, and thereafter the appellate authority illegally & unlawfully converted the punishment of reduction in pay by one stage into reduction in rank from Head Constable to substantive rank of Constable without adverting to other grounds vide order dated 20/06/2022. **(Copy of Departmental Appeal, Show cause Notice / Reply & Appellate Order dated 20/06/2022 is attach as Annex "C")**
5. That the Appellant then filed Revision Petition / Application on 28-06-2022 before the Respondent No 1 which was kept pending and thereafter the same was also dismissed vide Order 1324-29/23 dated 15-05-2023, but the same has not been conveyed to the appellant and the appellant got the knowledge of same on 13-06-2023 which is evident from application filed by the appellant. **(Copy of Application / Revision & Order No 1324-29/23 dated 15-05-2023 & Application file by appellant is attach as Annex "D")**
6. That the appellant being aggrieved from the impugned Revisional & Appellate order as well as initial order respectively dated 15-06-2023, 20/06/2022 & 24/03/2022 prefer this Service appeal before this Honorable Tribunal on the following grounds:-

GROUNDS:-

- A. That the impugned orders of Respondents are based on mala-fide, ulterior motive, against law & justice, therefore liable to be struck down and the Appellant is entitle for his own rank of Head Constable with all back benefits.
- B. That the appellant has not committed any sort of miss conduct, therefore the impugned orders are illegal, unwarranted and unjustified and are liable to be set aside.
- C. That the appellant has clearly stated in his reply to the show cause notice, that the matter is pertain to the jurisdiction of Police station Sardheri and duly informed the concerned Moharrir.
- D. That moreover no statement of allegation has been issued to the appellant even no final show cause notice has been issued to the appellant while imposing the impugned punishment of reduction in pay by one stage, meaning thereby that no opportunity of hearing has been provided to the appellant, therefore the appellant has been condemned unheard which is against the natural justice.
- E. That the appellate authority also without adverting to other facts of the case wrongly enhanced the punishment of the appellant from reduction in pay by one stage into reduction in rank from Head Constable to substantive rank of Constable without conducting detail inquiry, therefore the impugned orders are not sustainable under the law and are liable to be set aside.
- F. That the appellant has performed his duty to the entire Satisfaction of his high ups and after rendering more than 10-year service in the department & with the passage of time the appellant has been promoted to the post of Head Constable,

5

therefore at this stage the impugned orders are illegal and ineffective upon the rights of the appellant.

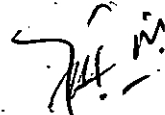
- G. That the punishment imposed on the appellant is very harsh and is with no good grounds, furthermore without conducting detail inquiry the appellant has been demoted from Head Constable to the post of Constable by the appellate authority which is wrongly upheld by the Revisional authority and the appellant has been penalized just for nothing, therefore the same act of Respondents is against the rules of law & justice, moreover the alleged negligence is not of such nature whereon such type of harsh punishment is be passed to the appellant.
- H. That the Appellant has not been treated in accordance with law nor extended equal protection of law which is inalienable right of the Appellant.
- I. That the Appellant seek leave of this Honorable Tribunal to raise any other grounds at the time of arguments

**Prayer:-**

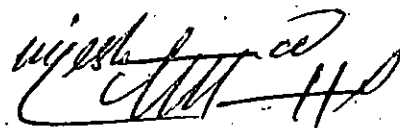
It is therefore, most humbly prayed that on acceptance of this Service appeal, the impugned Revisional Office Order No 1324-29/23 dated 15-05-2023 issued by Respondent No 1 & impugned Appellate order No 4300 / ES dated 20-06-2022 issued by Respondent No 3 as well as initial impugned Order No O.B No 342 dated 24-03-2022 issued by Respondent No 4 / DPO Charsadda may kindly be declared as illegal, unlawful, based on mala fide intention, ulterior motive, void ab-initio / discriminatory, having no backing of law, without lawful authority and of no legal effect and is liable to be set aside and the Respondents be directed to grant the appellant his own rank as Head Constable with all back benefits

⑥

Any other relief which has not been asked specifically for which the Appellant is entitled may also be granted.



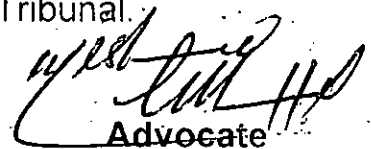
Appellant: Fazal Nabi  
Through



Muhammad Irshad Mohmand  
Advocate High Court  
Peshawar

CERTIFICATE

As per instruction of my client no such service appeal has earlier been filed by the Appellant before this Tribunal.



Advocate



7

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

Service Appeal No: - /2023

Fazal Nabi

(Appellant)

**VERSUS**

Provincial Police Officer Khyber Pakhtunkhwa at CPO  
Peshawar & others (Respondents)

**AFFIDAVIT**

I Fazal Nabi Presently Constable at Police Station Tarnab District Charsadda KPK Peshawar, do hereby solemnly affirm and declare that all the contents of the accompanied service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honorable Tribunal.

  
DEPONENT


**Identified by**



17101-5635511-1

0310-5094942

Muhammad Irshad Mohmand  
Advocate High Court  
Peshawar

  
12/2/23

8

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

Service Appeal No: - /2023

Fazal Nabi (Appellant)

**VERSUS**

Provincial Police Officer Khyber Pakhtunkhwa at CPO  
Peshawar & others (Respondents)

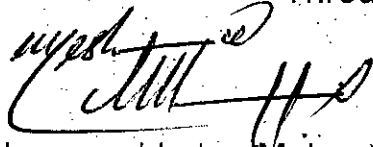
**ADDRESSES OF PARTIES**

Fazal Nabi, (IHC No 698) Presently Constable at Police Station  
Tarnab District Charsadda KPK Peshawar (Appellant)

**VERSUS**

1. Provincial Police Officer Khyber Pakhtunkhwa at CPO  
Peshawar
2. Additional Inspector General of Police HQrs KPK Peshawar.
3. Regional Police Officer Mardan
4. District Police Officer Charsadda (Respondents)

Appellant: Fazal Nabi  
Through

  
Muhammad Irshad Mohmand  
Advocate High Court  
Peshawar

Annex "A"

(9)



OFFICE OF THE  
DISTRICT POLICE OFFICER, CHARSADDA  
PHONE# 091-9220400 FAX#091-9220401  
EMAIL: [charsaddadpo@yahoo.com](mailto:charsaddadpo@yahoo.com)  
CHARGE SHEET UNDER KPK POLICE RULES 1975

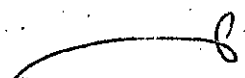
I, **Sohail Khalid**, District Police Officer Charsadda, as competent authority hereby charge you ASI Fazal Nabi, as follows.

That you ASI Fazal Nabi, while posted at Police Station Prang, an application/complaint of Mst. Fahmeeda was marked to you for immediate action against accused wasif but you did not bother to do so and also admitted in your reply during an enquiry against SI Irfan Khan that you take the same matter as light. Due to your such gross negligence, 02-precious lives were expired. Which shows your inefficiency and lack of interest in the performance of your official duties.

This amounts to grave misconduct on your part, warranting Departmental action against you as defined in section-6(I) (a) of the KPK Police Rules 1975.

1. By reason of the above, you appear to be guilty of misconduct under section 02(III) of the KPK Police Rules 1975 and has render your self liable to all or any of the penalties as specified in section 04 (I) a & b of the said rules.
2. You are therefore, directed to submit your written defense within seven days of the receipt of this Charge Sheet to the Enquiry Officer.
3. Your written defense, if any should reach to the enquiry officer within the specified period, in case of failure, it shall be presumed that you have no defense to put-in and in that case an ex-parte action shall follow against you.
4. Intimate, whether you desired to be heard in person.

  
DISTRICT POLICE OFFICER  
CHARSADDA

  
ATTESTED

تھار جمادی الثانی ۱۴۴۳ھ شہادت لکھی ۲۸-۲۹-۲۰۲۲ء 3/3/2022ء

مفتی صاحب اعظم لکھنؤ کے نام سے

مفتی صاحب اعظم لکھنؤ کے نام سے... (The main body of the handwritten text, which is largely illegible due to its cursive script and overlapping lines.)

ATTESTED

8/3/2022

Attested

9/3/22

Handwritten signature or text at the bottom left.

Attest

Handwritten signature or text at the bottom right.

(11) Annex "B" 5

ORDER

This order will dispose of the departmental enquiry against IHC Fazal Nabi, while posted at Police Station Prang, an application/complaint of Mst: Fahmeeda was marked to him for immediate action against accused wasif but he did not bother to do so and also admitted in his reply during an enquiry against SI Irfan Khan that he take the same matter as light. Due to his such gross negligence, 02-precious lives were expired. Which shows his inefficiency and lack of interest in the performance of his official duties. On the above allegation he was issued Charge Sheet together with statement of allegations under Sub Section 3, Section 5 of Police Rules 1975. Mr. Inam Jan Khan DSP Shabqadar was nominated as inquiry officer for probing into the matter by conducting departmental inquiry against him and he after fulfillment of codal formalities has submitted his findings.

Subsequently, IHC Fazal Nabi, was issued Final Show Cause Notice U/S 5(3) Police Rules 1975 reply to which was received but found unsatisfactory.

After perusal of the enquiry papers & recommendation of the enquiry officer as well as hearing him in orderely room, the undersigned reached to the conclusion that the allegations levelled against the official has been proved, therefore, he is hereby awarded the **"Major Punishment of Reduction in pay by one stage"**.

  
DISTRICT POLICE OFFICER  
CHARSADDA

O.B No. 342

Date 24/03/2022

No. 455-59 /HC, dated Charsadda the 24/03 /2022

CC.

Pay Officer/OASI  
EC/FMC *enclosure 15 pages*  
I/C Lab

ATTESTED

اتحادیه خیال بالسیات

آہاے طرز

Annex "C" (12)

جناب عالی! سیکشن 15 دہری 342 درجہ 211-3 جار خیاب - 022  
درخواست نمبر -

2680  
20-04-2022

درجہ 1/5 صیغہ شہرہ زوجہ صالحہ سند عمر آباد قریب  
مقام میں ایسا جمع کنندہ درخواست بنام واپس دلا گیا  
کل آباد علاقہ تھا سردھری دائرہ کے جوہر میں کاٹا گیا  
مادیوں میں IHC نے ملازم واپس لے گیا تھا  
یہ فائل دیا گیا تھا ایسا واپس لے گیا تھا  
ایسا جمع کنندہ یہ تہی ہو گیا

تعمیراتی امور کی بابت ایسٹ ڈویژن IHC نے  
ڈیپارٹمنٹ میں جاری ہے، مگر وہ ایسٹ ڈویژن  
شہرہ کو تحریری بیانات میں لکھ گیا ہے کہ  
مادیوں میں لیا گیا تھا مگر خارجی کا مطلب  
لیا گیا تھا ایسٹ ڈویژن میں لکھا گیا ہے  
کہ ایسٹ ڈویژن میں لکھا گیا ہے

جناب عالی! تھیں ہی کے بعد ہمارے  
تھیں ہی کے بعد ہمارے تھیں ہی کے بعد  
تھیں ہی کے بعد ہمارے تھیں ہی کے بعد  
تھیں ہی کے بعد ہمارے تھیں ہی کے بعد

تھیں ہی کے بعد ہمارے تھیں ہی کے بعد  
تھیں ہی کے بعد ہمارے تھیں ہی کے بعد

E-c  
for refaction

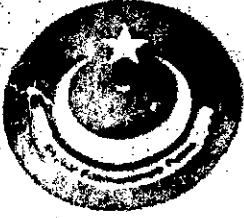
1HC  
698

Handwritten signature

0310-5094942

D/c checked  
20-04-2022

ATTESTED



13

Phone No 0937-9230113-114  
Fax No 0937-9230115  
Email: digmardan@gmail.com

GOVERNMENT OF KHYBER PAKHTUNKHWA  
OFFICE OF THE  
REGIONAL POLICE OFFICER,  
MARDAN

No. 3852 /ES, dated Mardan Region the 01<sup>st</sup> June, 2022

**SHOW CAUSE NOTICE**

Whereas you (IHC Fazal Nabi No.698) while posted at Police Station Prang, Charsadda were marked an application of deceased Mst Fahmeeda for immediate action against accused Wasif but you did not bother to do so and rather admitted that you took the matter as light. Your this act of laxity and sheer negligence cost the killing of applicant Mst. Fahmeeda as well as her sister Mst. Amina. On account of the aforementioned allegations departmental enquiry was initiated against you and you were awarded punishment of reduction in pay by one stage vide O B No.342, dated 24-03-2022. Feeling aggrieved, you filed a departmental appeal and during personal hearing it transpired that the order of punishment does not commensurate with the gravity of your misconduct, rather you deserve not to be retained in the force because of the unbecoming of an officer.

Therefore, it is proposed that why your punishment shall not be enhanced as envisaged under Rule 11, Sub Rule 4 Clause (d) of the Khyber Pakhtunkhwa Police Rules 1975 as amended 2014.

Hence I, Yaseen Farooq, PSP Regional Police Officer, Mardan in the exercise of the power vested under Rule 11, Sub Rule 4 Clause (d) of the Khyber Pakhtunkhwa Police Rules, 1975 as amended 2014 call upon you to Show Cause as to why not impose upon you the enhance punishment of dismissal/removal of service provided in the above-mentioned rules

Your reply shall reach this office within 07 days of receipt of the Notice, failing which it will be presumed that you have no explanation to offer.

You are at liberty to appear for personal hearing before the undersigned

  
REGIONAL POLICE OFFICER,  
MARDAN.

IHC Fazal Nabi No.698  
District Charsadda

CC

- 1 The District Police Officer, Charsadda
- 2 The Office Supdt. Region Office

**ATTESTED**

۱۶ ماہ ۲۰۲۲ء کو جاری شدہ سٹیٹمنٹ کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت  
۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت

۱۔ سٹیٹمنٹ کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت  
۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت

۲۔ سٹیٹمنٹ کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت  
۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت

۳۔ سٹیٹمنٹ کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت  
۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت

۴۔ سٹیٹمنٹ کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت  
۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت

۵۔ سٹیٹمنٹ کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت  
۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت

۶۔ سٹیٹمنٹ کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت  
۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت ۲۰۲۲ء میں جو سٹیٹمنٹ دی گئی ہے اس کے تحت

۱۱۱/۲۰۲۲  
۰۶/۰۶/۲۰۲۲

ATTESTED



(15)

In my opinion Head Constable Fazal Nabi No. 698 did not perform his duties as a Police Officer and his negligence resulted in death of 02 ladies.

This unprofessional approach and negligence cannot be tolerated in Police Department where immediate action is required at every step.

Keeping in view the above, I, Yaseen Farooq, PSP Regional Police Officer, Mardan, being the appellate authority, hereby convert the major punishment of reduction in pay by one stage into major punishment of reduction in rank from Head Constable to his substantive rank of Constable with immediate effect

Order Announced.

  
Regional Police Officer,  
Mardan.

No. 4300 /ES, Dated Mardan the 20/06 2022.

Copy forwarded to District Police Officer, Charsadda for information and necessary action w/r to his office Memo. No. 709/EC dated 12.05.2022. His Service Record is returned herewith.

(\*\*\*\*\*)

O B No 644

dated 21/6/22

ATTESTED

(1)

گفوری ضابطہ رسید جنرل آف پولیس حیدرآباد

AMULEX "D" دد فوائس لمبراد الفوائس دارر سی

تجواب عالی!

گزارش نجاتی قسم سائل سے ایک ہیٹ ڈیوایٹ سماہ صبرہ اور  
 وصال سند جاریہ ۲ بازار رقم پورصل میں ضابطہ ۱۵۲۰ مہ جاریہ نے ون  
 شیم ڈیکلشن ہے سٹارٹ کے جس میں من مائل ضابطہ ۱۲۲۰ مہ دون کو  
 الفوائس کی خاطر اپیل کے جس پر ضابطہ ۱۲۲۰ مہ دون نے من مائل  
 کی سزا اور پھر جاری اور من مائل سے اسٹریٹریڈ کوڈس اور لوٹر کوڈس  
 کے سزا اور پھر اپیل نہیں کیا دیا ہے۔  
 اس کے ساتھ من مائل سے سٹارٹ الفوائس جاری ہیں۔

اعراض

المرفوم 28/6/2022

بشیر

آپ کا نام لکھ فرمائی اپیل فائل کی 698 سفینہ لڈنہ ٹرانس

Contact: 0310-50949412

ATTESTED



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.

17

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted FC Fuzul Nabi No. 698 ( the then IC). The petitioner was awarded minor punishment of reduction in pay by one stage by DPO/Charsadda vide OB No. 342, dated 24.03.2022 on the allegations that he while posted at PS Prang, an application/complaint of Mst: Fahmeeda was marked to him for immediate action against accused Wasif but he did not bother to do so and also admitted in his reply during an enquiry against SI Irfan Khan that he took the same matter as light. Due to such gross negligence, two (02) precious lives were lost.

The Appellate Authority i.e. RPO/Mardan converted his punishment of reduction in pay by one stage into major punishment of reduction in rank from Head Constable to substantive rank of Constable vide order Endst: No. 4300/ES, dated 20.06.2022.

Meeting of Appellate Board was held on 18.04.2023 wherein petitioner was heard in person. Petitioner contended that he is innocent.

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. The Board sees no ground and reasons for acceptance of his petition; therefore, the Board decided that his petition is hereby rejected.

Sd/-

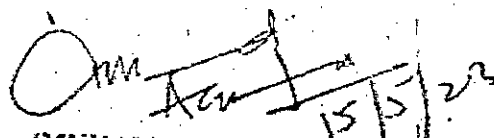
SABIR AHMED, PSP

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

No. S/ 1324-29/23, dated Peshawar, the 15-05 /2023.

Copy of the above is forwarded to the:

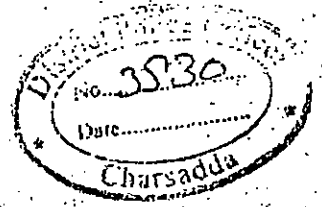
1. The Regional Police Officer Mardan. The Service Roll and Fauji Missal, of the above named FC received vide your office Memo: No. 5002/ES, dated 27.07.2022 is returned herewith for your office record.
2. District Police officer Charsada.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQs: Khyber Pakhtunkhwa, Peshawar.
6. O'Ce Supdt: E-IV CPD Peshawar.

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

15/5/23  
A/ESTED

کدہ ضا - ۵۸۵

(18)



درخواست گزار دینے اندر کی کاغذ

صالحا

گزارش کیا فی قسم سال کو لکھنا داندہ کے ایس سرور  
ممبروں کو جسے کچھ نخر اسیے تمام تر اندر کی کاغذ  
کاغذوں و دیگر لے

استدعا قسم تمام تر اندر کی کاغذات کو اور دیگر دینے کا حکم صادر  
فرمایا۔

6  
13-  
023

انراض

ایسے کا حق فرمایا کس فصل یا 698 جسے لکھا گیا۔

allowed

*[Signature]*  
13/6/23

ATTESTED

مختصہ چاہیے SAH 5415 نمبر پر

یڈر لٹریچر سائے فیسیدہ دھوم وصالہ ساکنہ سیدہ گل  
کوٹہ ٹنڈو ٹکلیں قلعہ

پیارے دادا سے ولدہ چاہیے ساکنہ گلہ آباد سرحد  
چاہیے عالی در

تو درشن کیساتی، فیکہ میں سالہ دہرہ  
گلہ کوٹہ ٹنڈو ٹکلیں قلعہ چاہیے سیدہ گلہ  
صیب سولہ گورہ میں موجود ہے کہ باسی در  
سیدہ گلہ سے ولدہ چاہیے ساکنہ گلہ آباد سرحد  
سیدہ گلہ میں فیسیدہ دھوم وصالہ ساکنہ سیدہ گلہ  
بھوت شدہ چاہیے سولہ گورہ یا کوٹہ میں  
نیم چھوڑاوت شدہ چاہیے اور ایسا لیسولہ نکال کر  
یاں سے مارنے کی دھمکی دے کر ایسا لیسولہ نکال کر  
سے اور یا دم چھین کر کر کے میں یا کوٹہ در  
شدہ چاہیے الام علیہ کوٹہ قلعہ کر کے  
اور ایسی چاہیے میں

سائے فیسیدہ دھوم وصالہ ساکنہ سیدہ گلہ  
کوٹہ ٹنڈو ٹکلیں قلعہ

ATTESTED

Attested  
mm

5-05-RSA-  
تعلیمی ادارہ  
05-01-22

9/3/22

3  
P  
E  
4  
R  
T  
S  
H  
I



50	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
2053	
ایڈوکیٹ: <i>Mirza Jafar</i>	PESHAWAR BAR ASSOCIATION
بار کونسل ایسوسی ایشن نمبر 3483-2	
رابطہ نمبر: 0300-5917744	

بجالات جناب: *سروس میٹریونل پشاور*

منجانب: <i>اصلاحی</i>	دعوی:
	علت نمبر:
	موضوع:
	جرم:
	تھانہ:

*فصل میں بنام میراوشش*

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی کے جواب دہی کاروائی متعلقہ آن مقام *کسٹمر کیلے حصار سٹارڈ منسٹر* کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعوی اقبال دعوی 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 کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات 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 یا حدت باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سفر ہے

Accepted

المرقوم: *Muhammad Iqbal* 12/07/2023

مقام *Mohammad* کے لیے منظور ہے

*Advocate* 0300-5917744

بجالات جناب