


FORM OF ORDER SHEET

Court of _____

Appeal No. 1828/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/09/2023	<p>The appeal of Mr. Rehan Ullah resubmitted today by Mr. Yasir Saleem Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <i>13-09-2023</i></p> <p>By the order of Chairman  f REGISTRAR.</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Service Appeal No. 1828 /2023

Rehan UllahAppellant

VERSUS

The superintendent of Frontier Reserve Police & another

...Respondents

INDEX

S#	Description of documents.	Annexure	Pages.
1.	Memo of appeal		1-5
2.	Addresses of parties		6
3.	Copy of doctor prescription and laboratory medical test	A-A.11	7-17
4.	Copy of impugned order dated 13.04.2023	B	18
5.	Copy of departmental appeal and rejection order No.7688 dated 11.08.2023	C-D	19-20
6.	Wakalatnama		21

Dated: 11.09.2023

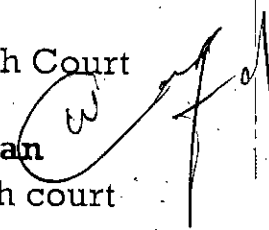
Appellants

Through


Niaz Khan

Advocate High Court
&

Wajid Ali Khan

Advocate high court 

①

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

Service Appeal No. 1828 /2023

Rehan Ullah Khan S/O Raees Khan R/O Bada Meer Abbas
Khan, Dalo Khel Tehsil and District Bannu.

..... (Appellant)

VERSUS

1. The Superintendent of Frontier Reserve Police (FRP)
District Bannu.
2. The Commandant Frontier Reserve Police Khyber
Pakhtunkhwa, Peshawar.

...Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHAWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED OFFICE ORDERS # OB
No.238 DATED 13/04/2023 AND No.7688/SI
LEGAL, DATED PESHAWAR THE 11/08/2023 IN
WHICH THE SERVICE OF APPELLANT IS
DISMISSED.**

Respectfully Sheweth;

1. That, the appellant permanent resident of District Bannu,
educated persons, peaceful citizen and was Govt. Servant in
capacity of Constables in Police Department (FRP) District
Bannu.

2. That, the appellants was performed his duty with zeal and zest in district Bannu and on dated 23.11.2022 the respondents transferred the appellant to Abbotabad for performing of special service period of almost 50 days, after the laps of some days of duty in Abbotabad the mother of appellant was badly affected from different chronic disease i.e. heart problem, diabetics, enteric fever, chest infection, headic and was reached to death bed condition, the appellant after getting knowledge about his mother disease he left the duty and leaved for Bannu to his house after proper oral approval of leave from his group commander for his mother care and treatment. **(Copy of doctor prescription and laboratory medical test are hereby attached as annexure A to A.11)**
3. That, the appellant while during the course of mother treatment he joined the duty on 05.01.2023 but where he shocked to know about dismissal of his service, without giving any proper opportunity of defense and justification about the leave, thereafter the appellant was started approach to his high ups and crave for setting aside his dismissal of service and for reinstatement but duly ignored.
4. That the appellant was lastly on 13.04.2023 approached to the respondent No.1 for reinstatement of his service where the respondent No.1 handed over the impugned dismissal order No.OB 238, in which the respondent mentioned that after conducting of proper departmental inquiry issued the said impugned order. **(Copy of impugned order dated 13.04.2023 is hereby attached as annexure B).**
5. That the appellant has got no knowledge about the departmental inquiry and there is no notice what so ever has

3

been served to the appellant and there is also no opportunity of personal hearing is given to the appellant which is against the law, norms of justice and illegal and having no enforcement in the eye of law and the inquiry officer has failed to hear both the parties while issued an ex parte charge sheet against the appellant.

6. That on the appellant feeling aggrieved from the impugned order No. OB 238/2023 forward departmental appeal on dated 17.04.2023 to respondent No.2 which is thereby rejected on dated 11.08.2023 through office order No.7688/SI LEGAL, DATED PESHAWAR.(Copy of departmental appeal and rejection order No. 7688 is hereby attached as annexure C-D).
7. That the appellant is belong to poor family and the only person of earning for maintenance of his family and have no other source of living in the worst situation of country, the act of the appellant was not intentionally.
8. That being aggrieved, and having no other remedy available, the appellants now approaches this Hon'ble Tribunal against the impugned order dated 13.04.2023 and order No. 7688/2023.

GROUND:

- A. That, the act of respondents by dismissing the service of the appellant and rejection of departmental appeal, despite of the fact that appellant had properly got permission from the group commander he was allowed to leave, is against the law,

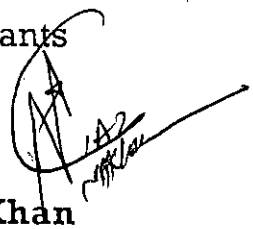
unjust, based on malafide intention, ulterior motive; hence, such act is not sustainable in the eye of law.


- B. That, the respondents, were duty bound to issued notice for proper hearing for his justification and defense and due to malafide, ulterior motive and having personal grudges with appellants issued the ex parte charge sheet and dismissal order.
- C. That, the appellant was discharging duty in District Bannu with zeal and zest and there is nothing on record that he has absented him from duty or ever shown negligence in performance of official duty.
- D. That, the instant departmental appeal is a classic example of discrimination. The appellant is regular employee of District Bannu Police (FRP) and on the basis of ulterior motive on part of respondents he has been dismissed from service without any cogent reason and despite of the fact that he was permitted by the high-ups for leave.
- E. That, in light of above, the act of respondents is totally unwarranted and against the law and as such the same is liable to be set at naught.
- F. That, the very act of respondents is violation of Articles 4, 8,10A, 25 and 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- G. That, the appellants counsel respectfully seeks permission of this Hon'ble Court to advance and rely on additional grounds at the time of hearing of instant appeal.

PRAYER:

ON ACCEPTANCE OF THE INSTANT APPEAL, THIS HON'BLE COURT MAY VERY GRACIOUSLY BE PLEASED TO, SUSPEND/CANCEL IMPUGNED OFFICE ORDER # OB NO.238 DATED 13/04/2023 AND TO DIRECT THE RESPONDENTS TO REINSTATE THE SERVICE OF APPELLANTS ALONG WITH ALL THE BACK BENIFITE AND MAY KINDLY SET ASIDE THR REJECTION OF DEPARTMENTAL APPEAL ORDER NO.7688/2023, JUST TO MEET THE ENDS OF JUSTICE AND TO ENABLE THE APPELLANT FOR DUTY TO EARN FOR HIS LIVELIHOOD. ANY OTHER RELIEF DEEMED APPROPRIATE BY THIS HON'BLE COURT AND NOT SPECIFICALLY PRAYED FOR; MAY KINDLY BE ALSO GRANTED.

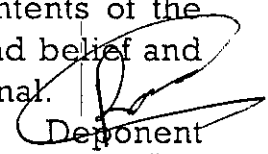
Dated: 11.09.2023

Appellants
Through 

Niaz Khan
Advocate High Court
&
Wajid Ali Khan 
Advocate high court

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this hon'ble Tribunal.


Deponent

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

Service Appeal No. _____/2023

Rehan UllahAppellant

VERSUS

The superintendent of Frontier Reserve Police & another

...Respondents

ADDRESSES OF PARTIES

APPELLANT

Rehan Ullah Khan S/O Raees Khan R/O Bada Meer Abbas Khan, Dalo Khel Tehsil and District Bannu.

RESPONDENTS

1. The Superintendent of Frontier Reserve Police (FRP) District Bannu.
2. The Commandant Frontier Reserve Police Khyber Pakhtunkhwa, Peshawar.

Dated: 11.09.2023

Appellants,

Through

Niaz Khan
Advocate High Court
&
Wajid Ali Khan
Advocate high court

(7)



ECHOCARDIOGRAPHY REPORT.

Name: Shamim Begam

Date: 10/11/2022

AGE YRS

Address

	Observed (cm)	Normal range according to weight (Lbs)					
		Adult	0-25	26-50	51-75	76-100	101-200
Lt. Vent Diastolic Dimen	6.4		3.2	3.8	4.5	4.7	5.6
Lt. Vent Systolic Dimen	4.8						
Lt. Atrial Dimension	4.2	2.0	2.3	2.7	2.8	4.1	4.1
Rt. Vent Dimension		2.5	1.5	1.5	2.0	2.0	2.0
Aortic Root Dimension	3.0	2.2	1.7	2.2	2.3	2.7	3.0
Int Vent Septal Thick	1.0	0.7	0.6	0.7	0.7	0.8	1.1
Lt. Vent Post wall Thick	3.0	0.7	0.6	0.7	0.7	0.8	1.1
Ejection Fraction	40%			FS			20%

Doppler Study	Gradient		Regurgitation	Mitral Valve Area (cm)
	Peak	Mean		
Mitral Valve			MODERATE	MV area (2 D) CM2
Tricuspid Valve			MODERATE	PHT
Aortic Valve				RVSP
Pulmonic Valve				45
				ASD size (cm)
				VSD size (cm)
				VSD Gradient (mmhg)

Comments on M-Mode & 2D.

DILATED AND GLOBALLY HYPOKINETIC LV. Abnormal VALVULAR STRUCTURES. SMALL PERICARDIAL EFFUSION SEEN LA/LV CLOT SEEN.

DOPPLER STUDY.

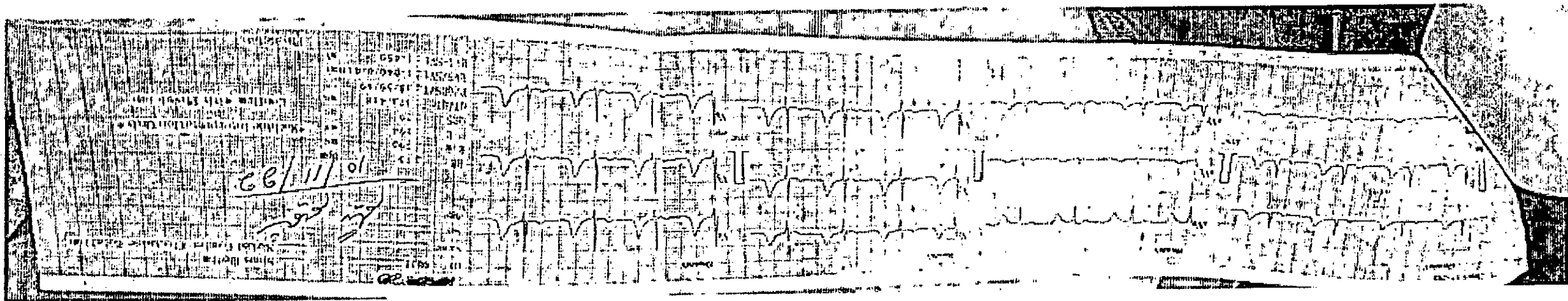
MR/DR

Final Impression:

CARDIOMYOPATHY.
IMPAIRED LV FUNCTION.

C.F.C
[Signature]

[Signature]
Mr. Nasir
Echocardiographer
Bannu



J. C.
[Signature]

⑧

Amesbury
A 2

DR. M. BILAL MARWAT

M.B.B.S (KMU) Peshawar
R.M.P
Medical Officer
DHQ Hospital Bannu



Not Valid For Court

میڈیکل اینڈ چوست سینٹر

ڈاکٹر محمد بلال مروت

ذاتی پریس (کے ایم سی) پشاور

پیشاپی

میڈیکل آفیسر ڈی ایچ کیو ہسپتال بannu

Patient's Name Shamim Begum

Age 55Y Sex F Date 15/11/2022

Clinical History

Rx

C
→ HTRV / SOB

→ Entric Para

→ GR
138
160/100

TPB 104

Og 78

Adress 75

(Ventral)
Kehkonar)

Excl

ADP

BSR / BCP

MD / WRD

ECG / ECO

X Ray chest
ADP

Handwritten Urdu notes and signature in the Clinical History section.

Signature

ADP
100%
100%
100%

Tib Capote 2.5g
ADP 100%

Tib - Naxalamin 100%

ADP 100%

Tib Cardant 2-6

ADP 100%

ADP 100%

ADP 100%

ADP 100%

ADP 100%

ADP 100%

Signature

Dr. Mustafa Kamal

M.B.B.S (Peshawar)
M.C.P.S (Medicine)
F.C.P.S (Pulmonology)
M.D. (USA)



ڈاکٹر مصطفیٰ کمال وزیری

ایم بی بی ایس (پشاور)
ایم سی پی ایس (میڈیسن)
ایف سی پی ایس (پالمونالوجی)
ایم ڈی یو ایس اے (امریکہ)

میڈیکل اینڈ چیٹ پیٹھلٹ ایلمونالوجسٹ
معدہ، سینہ، شوگر، باؤں پریش، جگر، کالیرقان، دمہ وغیرہ

Patient's Name محمد بیگم Age 55 Sex F Date 25/11/22

Clinical History

Rx

Not Valid For Court

C10

HTN1

Enteric + Fever

Chest Infection
Headache

BP/170/90

Ad
BCP/BSK

RFTS/ECG

Handwritten notes in Urdu, including 'بیماری' (disease) and 'تھری' (therapy).

wt eucla 22 lbs

Int. Rocaphin 10/10

Int. 85

Int. Tramadol 10
معدہ درد

tab. Capta 25/40

زمن کے لئے

tab. Nolvat 75/4
CNS

tab. Fedufin 400

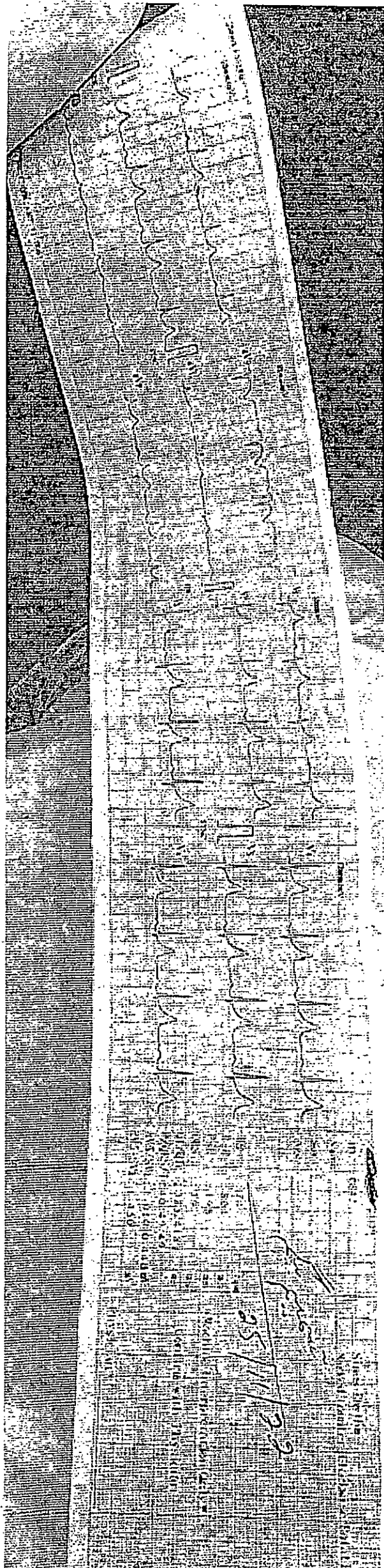
tab. ...

cosme E
HAG

Handwritten notes and signatures at the bottom of the Rx column.

Handwritten signature and date.

Handwritten notes and a small diagram. The diagram shows a circle with a vertical line through its center and a horizontal line intersecting it. The text "C. 2. 2" is written below the diagram, and "C. 2. 2" is written to the left of the diagram.



Handwritten text on the strip, possibly a date or a reference number: "25/11/22".

Handwritten text at the bottom left: "12" and "A. 2".

13

Annexure "A7"

ATLAS MEDICAL LABORATORY BANNU

Opp: D.H.Q Hospital Gate No.1 Bannu

Junaid.

B.Sc Pathology Technologist:

COMPUYERIZED
NOT VALID FOR COURT

P'Name: محمد سعید خان Age/Sex: F Date: 09/10/23

By Dr: Haimat ulloh Khan Test Required: BSP

HAEMATOLOGY				SEROLOGY			
TEST	N.RANGE	RESULT	RA Factor	Units	Results	N.Range	
HB%	(14-16)	11.6	Hbs Ag				
TLC	(4000-10000)	15000	Anti HCV				
Polymorphs	40-75%	73	H.Pylori				
Lymphocytes	20-45%	21	Mycodot Test				
Monocytes	02-07%	05	Toxo Plasma				
Eosinophil	00-02%	01	HIV 1&2				
Basophil	00-01%	01	Test				
Blood Group			S.Chol		mg/dl	100-200	
R.H Factor	+		T.G		mg/dl	70-150	
SER Westergren	M:2-15 F:2-12	Mm/1 st hr	FDL		mg/dl	M:35-55 F:45-65	
B/T	01-07	Min() sec()	LDL		mg/dl	Less than 150	
C/T	03-09	Min() sec()	Sodium		mg/dl	136-149	
Platelets Count	(150000-400000)	/cmm	Potassium		mg/dl	3.8-5.2	

BIOCHEMISTRY				WIDAL TEST	
TEST	RESULT	UNIT	N.RANG	TEST	RESULT
SBR		mg/dl	0.1-1.1	S.Typhi "O"	
ALT(SGPT)		u/l	F9-36, M9-43	S.Typhi "H"	
ALP Phosphatase		u/l	F65-306, M80-306	Widal Test:	
B.Sugar R/F	125	mg/dl	F70-110, M80-180	Typhidot IgM	IgG
Blood Urea		mg/dl	10-50	MP:	
S.Creat		mg/dl	0.6-1.1	L.D Bodies	
S.Calcium		mg/dl	8.1-10.4	Scrapping for Fungus	
S.Amylase		u/l	00-220	CRP---	
ASO Titer		iu/ml	Up to 200	V.D.R.L	
S.Uric Acid		mg/dl	F2.4-5.7, M3.4-7.0	T.P.H.A	

URINE EXAMINATION

PHYSICAL EXAMINATION		CHRMICAL EXAMINATION	MICROSCOPIC EXAMINATION
Quantity	ML	Protein	Red Cells
Colour		Sugar	Pus Cells
PH	Acidic/Alkaline	Ketone Bodies	Epith Cells
Sp. Gravity	Q.N.S	Bile Salt	Casts
		Uric Pigments	Other

Remarks: _____

(Signature)

Signature: Lab Technician

Dr. Naimat Ullah Khan
 Medical Gastro & Chest Specialist

ڈاکٹر نعمت اللہ خان

MBBS (KMC)
 FCPS (MEDICINE)
 RMP (PAK)

میڈیکل، کیسٹرو اینڈ چسٹ سپیشلسٹ

ایم بی بی ایس (کے ایم سی)
 ایف سی پی ایس (میڈیسن)
 آر ایم پی (پاک)

ماہر امراض سینہ و معدہ، گردن، ہڈی پریشورول، سرجنری، انیماٹالوجی
 امراض اعصاب، جڑ، عظم و ہڈی، عرقانہ کردی، آئی بی، جلدی، کرمی جسم کردی

ایکس راجسٹرار تو ام اسپتال ابو ظہبی العین

Pt / Name Shamim Begam Age 42 Sex F Date 9/12/22

Not Valid for Court

Clinical Record
 c/o

- HTN
- Enteric Fever
- SOB

Tab: CAB
 روزانہ جاری کمانڈ

Tab: Paracetamol
 ① + ① + ①

Tab: Amoxicillin 500mg
 روزانہ کمانڈ

Tab: Noctet 75mg
 روزانہ جاری

Cap: Omega 3
 ① ع.ت.ع

O/E
 B/P = 180/110 P = 92
 T = Jacklet
 CVS =
 Resp =

زبانہ غلیظ
 14/12/22
 3 شرف
 14/12/22
 3 شرف

Investigation
 BSr / BCP
 ECG

(Signature)

(Signature)
 14/2

بروز اتوار چیک اپ فری

Dr. M. Suijad

M.B.B.S
M.C.P.S (Medicine)
F.C.P.S (Pulmonology)



ڈاکٹر امجد سجاد

ایم بی بی ایس
ایم سی پی ایس (میڈیسن)
ایف سی پی ایس (پلمونالوجی)

PMDC:30379-N

میڈیکل اینڈ چیٹ سپیشلسٹ

ماہر امراض: معدہ، سینہ، شوگر، بلڈ پریشر، جگر، کالاجیرکان، اور مدد غیرہ

Patient's Name شہین بیگم Age 40 Sex F Date 24/12/2023

Clinical History Rx Not Valid for Court

40
HTN / Chest infection /
Enteric Fever / Headache

inj. Toradol / 1m
درد کے لیے 3 ٹائمن

Ad
Avoid eating salt,
meat, Ghee etc

B.P
180
110

Tab: Ascacid 25mg
1 روزانہ 1 بار

Tab: nMicrobac 250mg
3 دن 3 بار

Tab: Panadol
1 + 1 + 1

Tab: Cancor 25mg
1 روزانہ 1 بار

Cap: DDIR 4mg
1 روزانہ 1 بار

Ad
BSR / BCP
MP / ECG / X-ray Chest

C.T.C
Signature
N1

Dr. M. Sujjad

M.B.B.S

M.C.P.S (Medicine)

F.C.P.S (Pulmonology)

PMDC:30379-N



ڈاکٹر ایم سجاد

ایم بی بی ایس

ایم سی پی ایس (میڈیسن)

ایف سی پی ایس (پلو مو لوجی)

میڈیکل اینڈ چیٹ پیٹھلٹ

ماہر امراض: معدہ، سینہ، شوگر، بلڈ پریشر، جگر، کالا برقان، دوسرے وغیرہ

Patient's Name

شمیم بیگم

Age

Sex F

Date

06/01/2015

Clinical History

Rx

Not Valid For Court

90

HTN / Chest infection /
 Enteric fever / Headache

B.P

190

90

Tab: Calpac
 ① 1 ① 1 ①

Tab: Lasix / w
 ابھی سائیس

A.S

BCP / BSIC

EKG / X-ray chest

Tab. Argment 250mg
 200mg ①

Tab. Indrel 40mg
 200mg ①

Tab. Pancer
 200mg ①

Tab. Capoten 250mg
 200mg ①

Syp. Mucain

" : " - " C.F.C

[Signature]

[Signature]
 I.A.
 M.P.

Annexure
A11

(17)

SUDAIS MEDICAL LABORATORY

Sudais Khan.

Opp: D.H.Q Hospital Gate No.1 Bannu

B.Sc Pathology Technologist:

COMPUYERIZED
NOT VALID FOR COURT

Pt Name: [Signature] Age/SeX F Date 6/11/2023

Ref. By Dr: M. Sajjad Test Required: BSPR / BCP

HEMATOLOGY			SEROLOGE			
TEST	N.RANGE	RESULT	RA Factor	Units	Results	N.Range
HB%	(14---16)	12.1	Hbs Ag			100-200
TLC	(4000-10000)	14000	Anti HCV			70-150
Polymorphs	40---75 %	72	H.Pylori			M35-55 F-45-65
Lymphocytes	20---45 %	23	Mycodot Test			Less than 150
Monocytes	02---07 %	02	Toxo Plasma			136-140
Eosinophil	00---02 %	02	HIV 1&2			1.8-5.2
Basophil	00---01 %	61	S.Chol			
Blood Group			T.G			
R.H Factor			HDL			
SER Westergren	M.2-15 F.2-12	Mm/1" hr	LDL			
B/T	01-----07	Min() sec()	Sodium			
C/T	03-----09	Min() sec()	Potassium			
Platelets Count	(150000-400000)	/cmm				

BIOCHEMISTRY				WIDAL TEST	
TEST	RESULT	UNIT	N.RANG	TEST	
SBR		mg/dl	0.1-1.1	S.Typhi "O"	
ALT(SGPT)		u/l	19-36, M9-43	S.Typhi "H"	
ALP Phosphatase		u/l	65-306 M80-306	Widal Test:	
B.Sugar R/F	115	mg/dl	F70-110, R80-180	Typhidot IgM	IgG
Blood Urea		mg/dl	10-50	MP:	
S.Creat		mg/dl	0.6-1.1	L.D Bodies	
S.Calcium		mg/dl	8.1-10.4	Scrapping for Fungus	
S.Amylase		u/l	00-220	CRP----	
ASO Titer		iu/ml	Up to 200	V.D.R.L.	
S.Uric Acid		mg/dl	F2.4-5.7, M3.4-7.0	T.P.H.A	

Remarks

[Signature]
Signature.
Lab Technologist.

(18)

Amended
"B"

ORDER

My this order will dispose off the departmental proceedings so initiated against Constable Rehan Ullah No. 6955 /FRP who remained absent from Govt: duty vide daily dairy No.55 dated 23-11-2022 to 05-01-2023 for a total period of (43) days at Police Lines District Abbotabad without any leave or prior permission of the competent authority and again absent vide daily dairy No.20 dated 04-04-2023 till date of dismissal of FRP Police lines II District Bannu. On the basis of his prolong absence he was charge sheeted and appointment of Enquiry Officer of FRP Bannu Range to conduct proper Departmental Enquiry against the delinquent official.

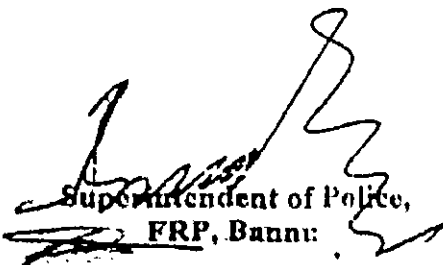
The Enquiry Officer deeply probed into the facts and conducted through enquiry with submission of his findings report wherein the Enquiry Officer reported that the charge sheet was properly served upon him on 23-01-2023, but the defaulter official replied to the charge sheet within stipulated period. Finally Enquiry Officer declared him willful and habitual absentee and recommended him for imposition of Major Punishment. Even did not bother to make arrival back for duty. He was also summoned from time to time to appear before the undersigned for personal hearing but he did not appear so far hence it is reasonably presumed that he does not want to produce any defense and seems to be dis-interested in continuous of Police service. Moreover on perusal of service record of the defaulter official, it also came to light that he repeatedly he absented himself for (275) days with awarded of certain punishments for the same but you did not mend his way.

Therefore I, Muhammad Tahir Shah Superintendent of Police FRP Bannu Range Bannu, being competent authority in exercise of the powers conferred to me under the Police Rules 1975 do hereby impose upon him the Major punishment of Dismissal from Service with immediate effect. The period of absence is also treated as leave without pay because of non-performance of Govt: duty for the entire period.

OB No. 238

Dated: 13/04/2023.

Copy to: PO, SRC & OHC for necessary action.


Superintendent of Police,
FRP, Bannu

copy


CLE
13/04

محرمت صاحبہ لکھانڈہ

FRP

Amendment

”ج“ ایمان اللہ کانسٹبل (ایڈوانس)

مخبران۔ اپیل عرائشہ بخالی ڈوری

سورہ تہذیب سائٹس میں عرض ذیل ہے۔
FRP/6955

ذیل سرانجام دے رہا تھا۔ خبر یہ کہ کانسٹبل کانسٹبل ڈورن
ایسٹ آباد کھائی ہوئی جس دوران سائٹس کا والدہ ماجدہ سہیلہ
ہوئی۔ جو کہ سہیلہ کے والدین۔ تو سائٹس جو کہ اپنے گورنمنٹ اور

یہ اور والدہ کی دیکھو سائٹس کے لیے کوئی بھی شخص ضرور تھا۔ تو اس دوران
سائٹس اپنے گورنمنٹ کے ذریعہ سے اجازت کے لیے ڈورن سے گاہک بنا
گیا۔ دوران والدہ ملاج سپرٹنڈنٹ آف FRP

بھرتی کے سپرٹنڈنٹس DISMISS دیا جس کی آفیس نمبر B238
13/6/2023 ہے۔ سائٹس کا غیر حاضر گاڑی اور وہ نہ لگانا ہے اور پانچواں

اجازت نہیں لکھی۔ (FRP) کہ یہ اور غیر قانونی ہے تو سائٹس
کہ عروج نہیں کے لیے خود بانی ہے۔ اور نہ سائٹس کو دیکھنا سائٹس
کے بارے میں کوئی علم تھا کہ سائٹس کو کوئی نوٹس دیا گیا ہے۔

لکھنا سائٹس کا ہے کہ سائٹس کو ڈوری لکھنا لکھنا کے غائب فرما دیا

سائٹس/ایڈوانس ایمان اللہ وکٹر سائٹس خان سائٹس بھرتی
خان، دالوہیل کھیل وکیل بھرتی۔

CINC # 11101-5275303-9

constable no FRP/6955

17/4/2023

مخبر

ORDER

Bannu

This order will dispose of the departmental appeal proffered by ex-constable Rehan Ullah No. 6955 of FRP Bannu Range, against the order of SP FRP Bannu Range, Bannu issued vide OB No. 238, dated 13.04.2023, wherein he was awarded major punishment of dismissal from service.

Brief facts of the case are that the above named applicant absented himself from lawful duty with effect from 23.11.2022 to 05.01.2023 for total period of (43) days and again absented himself with effect from 04.04.2023 till the date of dismissal from service i.e 13.04.2023 for total period of (52) days, without any leave or prior permission of the competent authority.

In this regard, proper departmental enquiry was initiated against him as he was issued Charge Sheet alongwith Summary of Allegations, which was properly served upon him on 23.01.2023, and Enquiry Officer of FRP Bannu Range was nominated to conduct proper enquiry against him. After completion of enquiry, the Enquiry Officer submitted his finding report, wherein the above named constable found a willful and habitual absentee. The Enquiry Officer found him guilty of the charges leveled against him and recommended for imposition of major punishment.

Upon the finding of Enquiry Officer, he was called in orderly room for personal hearing, but he did not appear before the competent authority.

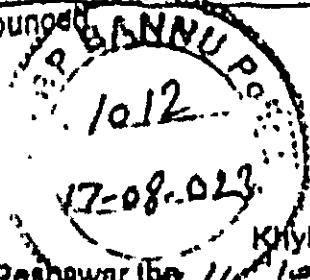
Keeping in view the above narrated facts and other material available on record, he was awarded major punishment of dismissal from service vide OB No. 233, dated 13.04.2023.

Feeling aggrieved against the impugned order of SP FRP Bannu Range, Bannu, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 08.08.2023.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. Perusal of enquiry file reveals that the allegations leveled against the appellant were fully established by the Enquiry Officer during the course of enquiry. Perusal of his service record the appellant found a habitual absentee as he was remained absent from duty on different occasions for a long period of 275 days, which he was awarded different punishments including major punishment of dismissal from service previously. 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 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



[Signature]
Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

No. 7688 ISI Legal, dated Peshawar the 14/10/2023.

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

1. SP FRP Bannu Range, Bannu. His Service record alongwith D-file sent herewith.
2. Ex-constable Rehan Ullah No. 6955 FRP Bannu S/o Raess Khan, No Village Zalim Dalo Khel, Police Station Mandan, District Bannu.

SRE/PO/OHC

For information & reaction.

[Signature]

قیمت 50 روپے	6247	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈویکٹ:	بار کونسل ایسوسی ایشن نمبر: 18-12-95	PESHAWAR BAR ASSOCIATION
رابطہ نمبر: 0335-0998442		Logo of Peshawar Bar Association

بعدالت جناب: حکومت گلخواہ سرحد کسٹمز اور ٹریڈ سیکشن

مخاطب: <u>مخبر اللہ</u>	دعویٰ:
	علت نمبر:
<u>SP-FRP بنام</u>	مورخہ:
<u>etc</u>	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 صاحب خان، محمد خان، خواجہ علی خان، سیدہ المصطفیٰ بیگم، سیدہ امیرہ بیگم کیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف 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 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 حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 9/19/2023
 العبد الغلام محمد شاہد

مقام _____ کے لیے منظور ہے۔
محمد شاہد

دعویٰ نمبر 18-12-95
 1161-5275303-9