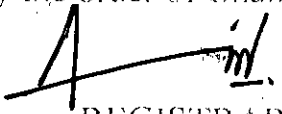


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

2073/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/10/2023	<p>The appeal of Mr. Muhammad Zeeshan presented today by Mr. Muhammad Shah Nawaz Khan Sikandri Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>18-10-23</u> Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE THE PROVINCIAL SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR.

Service Appeal No 2073/2023

Muhammad Zeeshan Khan

Vs

Inspector General of Police Khyber Pakhtunkhwa & Others

INDEX

S.No	Description of Documents	Annexure	Pages
1	Grounds of appeal, certificate, ^{affidavit} memo of addresses of the parties, C.M and Affidavit		1-9
2	Copy of detail list of ^{Psychological} test	"A"	10-25
3	Copy of appointment order of the Appellant	"B"	26-31
4	Copy of medical certificates	"C"	32-33
5	Copies of statement of allegations and reply	"D" & "E"	34-35
6	Copies of final show-cause notice and reply	"F" & "G"	36-37
7	Copy of impugned order of dismissal from service dated 17/08/2023	"H"	38
8	Copies of memo of Appeal and impugned order dated 20/09/2023	"I" & "J"	39-41
9	Wakalatnama		42

APPELLANT

THROUGH

MUHAMMAD SHAH NAWAZ KHAN
SIKANDRI ^{ASC}
ADVOCATE SUPREME COURT

MUHAMMAD USMAN KHAN
SIKANDRI
ADVOCATE HIGH COURT

Dated: 13/10/2023

①

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

Service Appeal No. 2073 /2023

Muhammad Zeeshan Khan Son of Muhammad Shah Nawaz Khan
Sikandari Resident of Village Faiz Talab Abbas P.S Mandan Tehsil &
District Bannu. (Ex-Constable No. 2417 of Special Security Unit (SSU)
C&PECT, Bannu. (Appellant)

Versus

- 1) Inspector General of Police Khyber Pakhtunkhwa, Peshawar.
- 2) Commandant Special Security Unit (SSU) (C&PECT) Khyber
Pakhtunkhwa Police, Peshawar Cantt.
- 3) Deputy Commandant Special Security Unit (SSU) (C&PECT)
Khyber Pakhtunkhwa Police, Peshawar Cantt.
- 4) Superintendent of Police (S.P) Admin & Minority Special Security
(SSU) (C&PECT) Khyber Pakhtunkhwa, Peshawar Cantt.
- 5) District Police Officer (DPO) District Bannu.

.....(Respondents)

**SERVICE APPEAL UNDER SECTION 4 OF SERVICE
TRIBUNAL ACT, 1974 READ WITH ALL THE
RELEVANT PROVISIONS OF LAW AGAINST THE
DISMISSAL FROM SERVICE ORDER OF THE
APPELLANT PASSED BY RESPONDENT NO.4 VIDE
DATED 17/08/2023 AND ALSO AGAINST THE
ORDER OF RESPONDENT NO.3 AS DEPARTMENTAL
APPELLATE AUTHORITY VIDE DATED 20/09/2023.**

**PRAYER: ON ACCEPTANCE OF THIS SERVICE APPEAL, BOTH
THE IMPUGNED ORDERS MENTIONED ABOVE MAY
VERY KINDLY BE SET ASIDE BY RE-INSTATING**

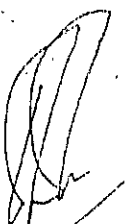

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**THE APPELLANT IN SERVICE WITH FULL BACK
BENEFITS AND WITH RETROSPECTIVE EFFECT.**

Respectfully Sheweth:-

- 1) That the Appellant is qualified upto M.A Political Science from University of Science & Technology Bannu and also LLB from Peshawar, moreover he also got a technical diploma in Information Technology. After passing the ETEA test he also qualified the ^{PS A} psychology test of the Police Department held on 12-13/November 2019 by the District Police Bannu Region Selection Board.
(The Detail list of psychology test is hereby annexed as Annexure-A)
- 2) That after fulfillment all the requirements the Appellant was appointed as Constable BPS-07 vide order dated 30/12/2019, issued by District Police Officer Bannu.
(Copy of Appointment order dated 30/12/2019 is hereby annexed as Annexure-B)
- 3) That the Appellant was deputed to C.I.P.E.C and its Unit was functioning at Bannu whereas on 08/03/2023 the same was transferred to Lower Kohistan and the Appellant accordingly started function at Kohistan, but because of the climate change and atmospheric allergy he got kidney problems and then submitted medical certificates to his immediate Boss as because of such force majeure he was completely unable to fulfill his duties.
(The Medical Certificates are hereby annexed as Annexure-C)
- 4) That, as on 09/05/2023 the Appellant while extremely sick received a statement of allegation with regard to his absence which was accordingly replied by the Appellant.
(Copies of statement of allegations and reply thereof are hereby annexed as Annexure-D & E respectively)
- 5) That on 12/07/2023 the Appellant received final show-cause notice which was replied on 19/07/2023.



ASC

(Copies of final show-cause notice and reply are hereby annexed as Annexure-F & G respectively)

6) That the Appellant was dismissed from service vide impugned order dated 17/08/2023.

(Copy of impugned order dated 17/08/2023 is hereby annexed as Annexure-H)

7) That the Appellant thus preferred Departmental Appeal on dated 29/08/2023, but the same was also rejected vide order dated 20/09/2023.

(Copies of memo of Appeal and order thereof are hereby annexed as Annexure-I & J, respectively)

8) That now the Appellant has got no other choice but to knock at the door of this Honourable Tribunal for the remedy and the ends of justice with a prayer in the head note of this Service Appeal, inter alia on the following grounds.

GROUND

- a) That both the basic dismissal order as well the final one impugned herein are illegal, against the law and principle of justice and as such liable to be set aside.
- b) That the Appellant sickness was obviously because of the climate change, unclear drinking water and atmospheric allergy which was beyond the control of Appellant, moreover the medical prescription have not been taken into consideration by the Departmental Authorities which is obviously the violation of the principle of *Audi Alter Partum* and as such the dismissal from service order impugned herein are totally in effective upon the rights of the Appellant is liable to be turn down in the interest of justice.
- c) That the law on the subject has totally been misconceived by the Departmental Authorities whereas the Appellant has been awarded with the major penalty in a very cruel and harsh manner in-spite of the fact that the Appellant was never in fault.
- d) That the Appellant has rendered his more than 3 year service career with above board performance and spotless career and upto the satisfaction of all his superior moreover he has been awarded with many commendation by his superior officers.


ASC


- e) That both the impugned orders of dismissal are arbitrary and discriminatory both in law and in facts.
- f) That the impugned orders also indicating the malafide and harshness of the Departmental Authorities which is also against the rights of the Appellant enunciated by the services law as well guaranteed and secured ^{by} Article 4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- g) That the absence period, mentioned in the impugned order could be converted into sanctioned leave in circumstance of the case under the law and cannon of justice.
- h) That the Counsel for Appellant seeks permission to rely and advance additional grounds at the time of hearing of this Appeal.


For the aforesaid reasons and others to be stated at the time of arguments, it is, therefore, most humbly prayed that on acceptance of instant appeal, this Honourable tribunal may very graciously be pleased to set aside both the impugned orders mentioned above may very kindly be set aside by re-instating the Appellant in service with full back benefits and with retrospective effect.

Any other relief, if this Honourable tribunal may deem fit in the circumstances may also be granted.


APPELLANT

THROUGH


MUHAMMAD SHAH NAWAZ KHAN
SIKANDRI
ADVOCATE SUPREME COURT


MUHAMMAD USMAN KHAN
SIKANDRI
ADVOCATE HIGH COURT

Dated: 13/10/2023

5

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

Service Appeal No. _____/2023

Muhammad Zeeshan Khan

Vs

Inspector General of Police Khyber Pakhtunkhwa & Others

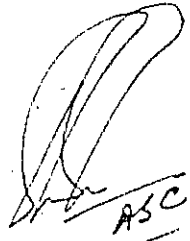
CERTIFICATE

It is to certify that no such like appeal has ever been moved by the appellant before this Honourable Tribunal and the contents of this appeal are true and correct.



APPELLANT

THROUGH


ASC

**MUHAMMAD SHAH NAWAZ KHAN
SIKANDRI
ADVOCATE SUPREME COURT**


**MUHAMMAD USMAN KHAN
SIKANDRI
ADVOCATE HIGH COURT**

Dated: 13/10/2023

6

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

Muhammad Zeeshan Khan

Vs


Inspector General of Police Khyber Pakhtunkhwa & Others

AFFIDAVIT

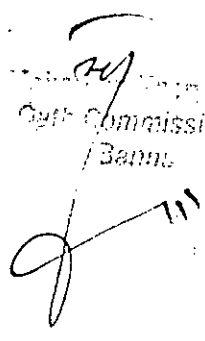
I, Muhammad Zeeshan Khan Son of Muhammad Shah Nawaz Khan Sikandri R/O Faiz Talab Abbas Mandan District Bannu, do hereby solemnly affirm and declare that all contents of this appeal are true, correct to the best of my knowledge and belief.

IDENTIFIED


DEPONENT


ASC

**MUHAMMAD SHAH NAWAZ KHAN
SIKANDRI
ADVOCATE SUPREME COURT**


Geth Commissioner
Bannu

Dated: 13/10/2023

(7)

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

Service Appeal No. _____/2023

Muhammad Zeeshan Khan

VS

IGP KP& Others

MEMO OF ADDRESSES OF THE PARTIES

Address of the Appellant:


Muhammad Zeeshan Khan Son of Muhammad Shah Nawaz Khan
Sikandari Resident of Village Faiz Talab Abbas P.S Mandan Tehsil &
District Bannu. (Ex-Constable No. 2417 of Special Security Unit (SSU)
C&PEC, Bannu.

Addresses of the Respondents:

- 1) Inspector General of Police Khyber Pakhtunkhwa, Peshawar.
- 2) Commandant Special Security Unit (SSU) (C&PEC) Khyber
Pakhtunkhwa Police, Peshawar Cantt.
- 3) Deputy Commandant Special Security Unit (SSU) (C&PEC)
Khyber Pakhtunkhwa Police, Peshawar Cantt.
- 4) Superintendent of Police (S.P) Admin & Minority Special Security
(SSU) (C&PEC) Khyber Pakhtunkhwa, Peshawar Cantt.
- 5) District Police Officer (DPO) District Bannu.


APPELLANT

THROUGH


MUHAMMAD SHAH NAWAZ KHAN
SIKANDRI
ADVOCATE SUPREME COURT


MUHAMMAD USMAN KHAN
SIKANDRI
ADVOCATE HIGH COURT

Dated: 13/10/2023

8

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

C.M No. _____/2023 in Service Appeal No. _____/2023

Muhammad Zeeshan Khan

Vs

Inspector General of Police Khyber Pakhtunkhwa & Others

**SUBJECT: APPLICATION FOR SUSPENSION OF THE
IMPUGNED ORDERS DATED 17/08/2023 AS WELL
AS 20/09/2023 TILL THE DECISION OF THE MAIN
APPEAL.**

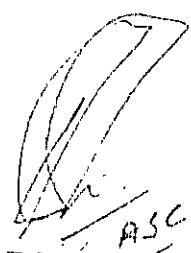
Respectfully Sheweth;

- 1) That the applicant has filed connected Service Appeal before this Honourable Tribunal, which will take a lot of time in its disposal.
- 2) That the applicant has good prima facie case and balance of convenience also lies in favour of applicant, which is based on documentary evidence.
- 3) That the applicant will suffer irreparable loss if the operation of impugned orders dated 17/08/2023 as well as 20/09/2023 not suspended.
- 4) That the grounds of main appeal may kindly be considered as part and parcel of this Application.

It is, therefore, requested to suspend the operations of impugned orders dated 17/08/2023 and 20/09/2023, issued by the respondents till final decision of the accompanied appeal.


APPELLANT

THROUGH


**MUHAMMAD SHAH NAWAZ KHAN
SIKANDRI
ADVOCATE SUPREME COURT**

9

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

C.M No. /2023 in Service Appeal No. ____/2023

Muhammad Zeeshan Khan

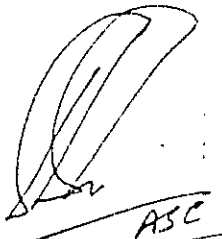
Vs

Inspector General of Police Khyber Pakhtunkhwa & Others

AFFIDAVIT

I, Muhammad Zeeshan Khan Son of Muhammad Shah Nawaz Khan Sikandri R/O Faiz Talab Abbas Mandan District Bannu, do hereby solemnly affirm and declare that all contents of this application are true, correct to the best of my knowledge and belief.

IDENTIFIED



**MUHAMMAD SHAH NAWAZ KHAN
SIKANDRI
ADVOCATE SUPREME COURT**

Dated: 13/10/2023

DEPONENT



**Fazl
Muhammad Khan Wazir
District Commissioner
Bannu**



REGIONAL SELECTION BOARD, BANNU


Annexure A

Total 232 ETEA qualified candidates as constables of District Bannu were called for Psychological Evaluation and Final Selection Interview by Regional Selection Board Bannu. Out of which 218 candidates appeared in personality test and were interviewed by the Regional Selection Board on 12 November & 13 November 2019 at District Police Office, Bannu. The Regional selection Board comprised of the following officers:

- | | | |
|---------------------------------------|--------------------------------|----------|
| 1. Mr. Abdul Ghafoor Afridi, PSP, PPM | Regional Police Officer, Bannu | Chairman |
| 2. Major Mian Muhammad Saleem Shah | Senior Psychologist | Member |
| 3. Mr. Yasir Afridi, PSP | District Police Officer, Bannu | Member |

Following recommendations were made:

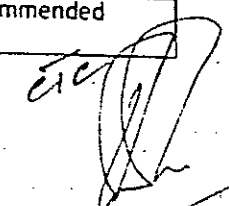
S.#	CNIC NO.	NAME	FATHER NAME	DISTRICT	PSYCHOLOGIST RECOMMENDATION	REGIONAL SELECTION BOARD RECOMMENDATION
1.	11101-1799077-5	Bakht Nawaz Khan	Gul Dad Khan	Bannu	Recommended	Recommended
2.	11101-9903804-3	Shahid Ullah Khan	Mamtaz Khan	Bannu	Recommended	Recommended
3.	11101-7937917-9	Naseeb Ullah Khan	Muhammad Ishaq Khan	Bannu	Recommended	Recommended
4.	11101-1903356-3	Muhammad Sohail Khan	Muhammad Nawaz	Bannu	Recommended	Recommended
5.	11101-5010093-9	Muhammad Kamran Khan	Tehsil Khan	Bannu	Recommended	Recommended
6.	11101-9403004-5	Kifayat Ullah Khan	Inayat Ullah	Bannu	Recommended	Recommended
7.	11101-0894105-5	Shahid Ali Khan	Sahib Zali Khan	Bannu	Recommended	Recommended
8.	11101-7366023-7	Muhammad Haroon Khan	Ghulam Daud Khan	Bannu	Recommended	Recommended
9.	11101-2521934-3	Sufyan Ayaz	Raqiaz Khan	Bannu	Recommended	Recommended
10.	11101-2218674-5	Mushtaq Ahmad	Ghulam Farooq	Bannu	Recommended	Recommended
11.	11101-7819133-1	Mehran Ullah Shah	Hidayat Ullah Shah	Bannu	Recommended	Recommended

etc

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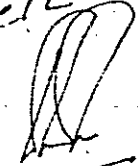
12.	11101-9431274-3	Muhammad Qasim khan	Muhammad Yaqoob Khan	Bannu	This candidate has poor comprehension and lacks applied intelligence. His performance in test and interview does not commensurate with his academic record. Fails to comprehend even simple practical situation and loses composure under stress. Overall a very weak candidate who is not fit to be inducted into Police department. Not Recommended	Not Recommended
13.	11101-3354574-3	Muhammad Ali Khan	Gul Mar Jan	Bannu	Recommended	Recommended
14.	11101-1111515-3	Arab Khan	Ayaz	Bannu	Recommended	Recommended
15.	11101-5490010-5	Zakir Ullah Khan	Muhammad Usman	Bannu	Recommended	Recommended
16.	11101-4604272-3	Mehtab Ali	Aftab Ali	Bannu	Recommended	Recommended
17.	11101-6080865-1	Ahmad Nawaz Khan	Mir Azad Khan	Bannu	Recommended	Recommended
18.	11101-6756895-5	Wasiq Ahmad Khan	Afsar Zaman	Bannu	Recommended	Recommended
19.	11101-1723557-7	Amin Ullah	Aman Ullah Khan	Bannu	Recommended	Recommended

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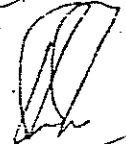
20.	11101-5492877-1	Roman Khan	Fazal Khan	Bannu	A superficial and verbose candidate, who loses composure under stress and critical in his approach. He does not show adequate with the assigned job and has a demanding nature. Over all a weak candidate who is not likely to be benefited from training.	Not Recommended
21.	11101-9420439-3	Haroon Rashid	Aftab Zaman	Bannu	Recommended	Recommended
22.	45402-5387827-1	Afnan Khan	Malik wresham Khan	Bannu	Recommended	Recommended
23.	11101-2580930-7	Muhammad Nasir	Gul Zaman	Bannu	Recommended	Recommended
24.	11101-8242492-3	Qayum Khan	Falak Naz Khan	Bannu	Recommended	Recommended
25.	11101-7197670-1	Maqbool Ur Rehman Shah	Mehboob Rehman Shah	Bannu	Deficient in height by ¼ inch	Not Eligible
26.	11101-6754595-9	Fahim Ullah Khan	Umer ayaz Khan	Bannu	Recommended	Recommended
27.	11101-6876931-3	Arif Ullah Khan	Maju Khan	Bannu	Recommended	Recommended
28.	11101-7087491-3	Zakir Ullah Khan	Gul Banaf Shah	Bannu	Recommended	Recommended
29.	11101-1841253-7	Amin Ullah Khan	Nasrullah Jan	Bannu	Recommended	Recommended
30.	11101-5785049-9	Waseem Ullah	Umer Ali Khan	Bannu	Recommended	Recommended
31.	ABSENT	Mujib Ur Rehman	Mir Abdul Rehman	Bannu	ABSENT	ABSENT
32.	11101-3840742-7	Zia Ullah Khan	Ameen Ullah Khan	Bannu	Recommended	Recommended
33.	11101-5350838-3	Muhammad Asim Bakht	Bakhtabaz Khan	Bannu	Recommended	Recommended
34.	ABSENT	Fawad Khan [Not Verified]	Gul Shad Ayaz Khan	Bannu	ABSENT	ABSENT
35.	11101-1429719-3	Mohsin Ali Khan	Zahid Ali Khan	Bannu	Recommended	Recommended

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	11101-5635250-1	Umer Farooq	Azmat Ali	Bannu	Recommended	Recommended
37.	11101-1143497-1	Baz Muhamamd Khan	Muhammad Yaqoob Khan	Bannu	Recommended	Recommended
38.	11101-1019829-5	Saqib Ullah Inayat	Inayat Ullah Khan	Bannu	Recommended	Recommended
39.	11101-2838697-9	Wazir Ullah Khan	Shalil Khan Khan	Bannu	Recommended	Recommended
40.	11101-5067106-3	Niaz Ali Khan	Khan	Bannu	Recommended	Recommended
41.	11101-0326305-3	Balqiaz Khan	Muhammad Biaz Khan	Bannu	Recommended	Recommended
42.	11101-9045611-1	Aamir Khan	Shoukat Ali Khan	Bannu	Recommended	Recommended
43.	11101-8165686-3	Rizwan Iqbal	Abdus Sammad Khan	Bannu	Recommended	Recommended
44.	11101-9138721-1	Safi Ullah Khan	Muhammad dar Ali Khan	Bannu	Recommended	Recommended
45.	11101-9372622-9	Mishkat Ullah	Raqib Khan	Bannu	Recommended	Recommended
46.	11101-1788074-1	Muzzamal Nawaz Shah	Bahader Nawaz Shah	Bannu	Recommended	Recommended
47.	11101-0512088-7	Saqib Khan	Israr Khan	Bannu	Recommended	Recommended
48.	11101-0804747-9	Hameed Ullah	Khubaz Khan	Bannu	Recommended	Recommended
49.	11101-3596130-1	Ibneyameen Khan	Gul Nawab Khan	Bannu	Recommended	Recommended
50.	11101-4225276-9	Amir Khan	Khan wali Khan	Bannu	Deficient in height by $\frac{3}{4}$ inch	Not Eligible
51.	11101-0901910-1	Muddasir Ali Shah	Gul Khuban Shah	Bannu	Recommended	Recommended
52.	11101-4208191-5	Iqtedar Ali Shah	Rab Nawaz Shah	Bannu	Recommended	Recommended
53.	11101-7455164-3	Abid Ullah	Mamriz Khan	Bannu	Recommended	Recommended
54.	11101-7571944-5	Irfan Ullah Khan	Ihsan Ullah Khan	Bannu	Recommended	Recommended
55.	11101-0174380-5	Sunaid Ali Shah	Mir Laiq Shah	Bannu	Recommended	Recommended
56.	11101-8289837-3	Asmat Ullah	Ghani Gul	Bannu	Recommended	Recommended
57.	11101-1790395-7	Mir Zafar Shah	Mir Shahzada	Bannu	Recommended	Recommended

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	11102-0371583-9	Yasir Ullah	Muhammad Rafiq	Bannu	Recommended	Recommended
59.	11101-5981318-1	Muhammad Bashir	Ghulam qasim Dad	Bannu	Recommended	Recommended
60.	11101-6992622-1	Muhammad Tariq Khan	Hamzar Ali Khan	Bannu	Recommended	Recommended
61.	11101-3587172-7	Waseem rehman	Aziz Rehman	Bannu	Recommended	Recommended
62.	11101-6532197-3	Aamir Sohail Khan	Taj Ali Khan	Bannu	Recommended	Recommended
63.	11101-0317536-5	Alam Zeb Khan	Akbar Nawaz Khan	Bannu	Recommended	Recommended
64.	11101-2038861-5	Majib Ur Rehman	Karam Ali Khan	Bannu	Recommended	Recommended
65.	11101-8962491-5	Shaheen Ullah Khan	Mir Ali Subkhan	Bannu	Recommended	Recommended
66.	11101-4226427-5	Asif Ullah Shah	Naimat Ullah Shah	Bannu	Recommended	Recommended
67.	11101-4667476-5	Yousaf Amen	Amir Aman Ullah Khan	Bannu	Recommended	Recommended
68.	11102-0369797-3	Aziz Ullah Khan	Mula Khan	Bannu	This candidate possesses poor comprehension and faced to handle practical situation effectively. He also confessed in interview that someone else appeared for him in ETEA test. Overall a very weak candidate and is not fit to be inducted in Police. Not Recommended	Not Recommended

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69.	11101-1743862-7	Abdul Zaman	Shabqader Khan	Bannu	This candidate possesses poor comprehension, lacks applied intelligence and loses composure under stress. He does not show adequate concern with the assigned job and tends to fluster when faced with difficulties. He is not a suitable individual for police services. Not Recommended	Not Recommended
70.	11102-0339772-1	Aftab Ullah	Noor Ali Khan	Bannu	Recommended	Recommended
71.	11101-8446491-7	Khan Baz Khan	Dil Nawaz	Bannu	Recommended	Recommended
72.	11101-0384550-5	Said Mudasir Ali Shah	Muhammad Ajmal Khan	Bannu	Recommended	Recommended
73.	11101-9997832-7	Aman Ullah Khan	Bakht Ali Khan	Bannu	This candidate has poor comprehension and lacks applied intelligence. His performance in test and interview does not commensurate with his academic record. Fails to comprehend even simple practical situation and loses composure under stress. Overall a very weak candidate who is not fit to be inducted into Police department. Not Recommended	Not Recommended

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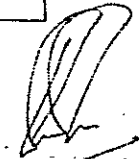
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	11101-9142870-3	Irfan Ullah	Hasham ali Khan	Bannu	Recommended	Recommended
75.	11101-4032184-5	Said Sufyan Ali Shah	Said Hussain Ali Shah	Bannu	Recommended	Recommended
76.	11101-3163276-7	Majid Ullah	Toti jan	Bannu	Recommended	Recommended
77.	11101-3195971-7	Raham Dil Shah.	Raqib Shah	Bannu	Recommended	Recommended
78.	11101-6317992-7	Taimur Zaman	Bahader Zaman	Bannu	Recommended	Recommended
79.	11101-7454708-7	Abdus saboor Khan	Mahmood Khan	Bannu	Recommended	Recommended
80.	11101-5818618-1	Ashfaq Khan	Muhammad Shafiq	Bannu	Recommended	Recommended
81.	11102-0350192-1	Hanif Ullah	Sher Abaz Khan	Bannu	Recommended	Recommended
82.	11101-5037282-9	Nauman Khan	Mehboob Khan	Bannu	Recommended	Recommended
83.	11101-6989546-9	Ihtisham Ahmad	Ahmad Nawaz	Bannu	Recommended	Recommended
84.	11101-7077565-1	Haroon ali Shah	Usman ali Shah	Bannu	Recommended	Recommended
85.	11101-2935736-1	Abdul wahab Khan	Muhammad Shafiq	Bannu	Recommended	Recommended
86.	11101-5663777-9	Touseef Khan	Iqbal khan	Bannu	Recommended	Recommended
87.	11101-1144680-7	Shakir Ullah Khan	Nazir Ullah Khan	Bannu	Recommended	Recommended
88.	11101-3678607-1	Wasim Ullah Khan	Asmat Ullah	Bannu	Recommended	Recommended
89.	11101-7502322-9	Nasir Ali Shah	Shahbar Ali Shah	Bannu	Recommended	Recommended

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90.	11102-0351160-1	Hamid Usman ...	Gul Rustam Khan.	Bannu	This candidate possesses poor comprehension under confident, loses composure under stress and not likely to shoulder responsibility independently. He does not show adequate concern with the assigned job and tends to fluster when faced with difficulties. Overall a very weak candidate who is not fit to be inducted as constable in police department. Not Recommended	Not Recommended
91.	11102-0353247-9	Fida Muhammad	Khaider Khan	Bannu	Recommended	Recommended
92.	11101-0981811-5	Fahad Nawaz	Jan Baz Khan	Bannu	Recommended	Recommended
93.	11101-0169280-5	Amjad Khan	Barkat Ali Khan	Bannu	Recommended	Recommended
94.	11101-8812507-3	Tariq Aziz Khan	Mir Hamzad Khan	Bannu	Recommended	Recommended
95.	11101-4892274-5	Azmat Ullah Khan	Bahader zaman	Bannu	Recommended	Recommended
96.	11101-5620258-5	Roman Ul Haq	Abdul Satfar Khan	Bannu	Deficient in height by 3/4 inch	Not Eligible
97.	11101-8658860-7	Muhammad Sohail khan	Nazar Khan	Bannu	Recommended	Recommended
98.	11101-3144656-7	Asif Khan	Ayub Khan	Bannu	Recommended	Recommended
99.	11101-5865588-3	Kashif Ullah	Akhtar Zaman	Bannu	Recommended	Recommended
100.	11101-5775729-7	Shahid Khan	Gul Sada Khan	Bannu	Recommended	Recommended
101.	11101-4457891-3	Salman Khan	Niaz Khan	Bannu	Recommended	Recommended
102.	11101-2685141-7	Jamshid Khan	Azad Khan	Bannu	Deficient in height by 1/2 inch	Not Eligible
103.	11101-7150832-9	Zaka Ullah Khan	Muhammad Ibrar Khan	Bannu	Recommended	Recommended
					Recommended	Recommended.

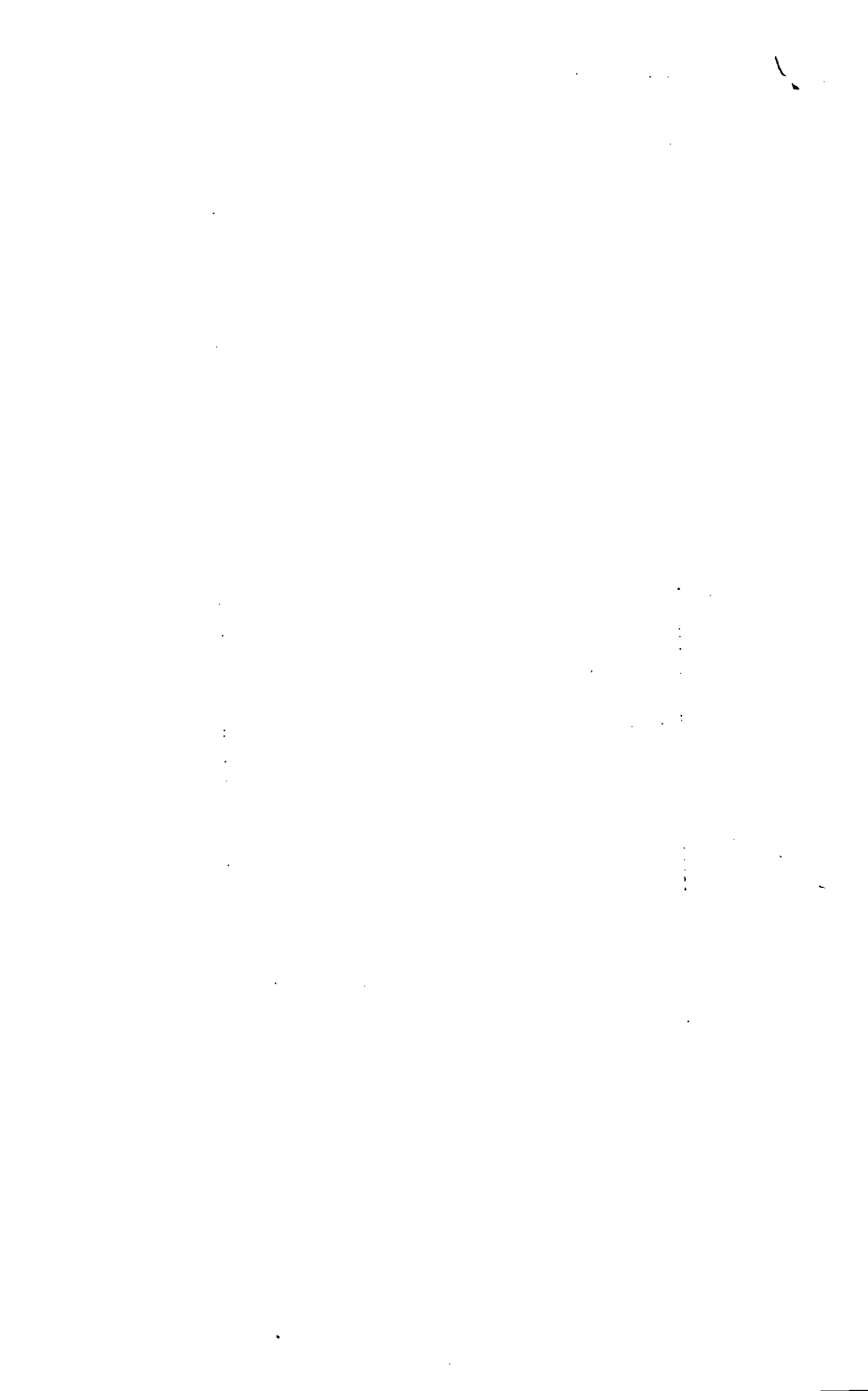
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105.	11101-1047718-1	Munir Shah	Nazar Ali	Bannu	Recommended	Recommended
106.	11101-2831491-5	Muhammad Zohaib Khan	Arsala Khan	Bannu	Recommended	Recommended
107.	11102-0346904-5	Noor Salim	Sardaraz Khan	Bannu	Recommended	Recommended
108.	11101-2595885-5	Hizbullah Khan	Arif Ullah	Bannu	Recommended	Recommended
109.	11101-8237639-3	Ifrar Khan	Fazal Karim Kban	Bannu	Recommended	Recommended
110.	11101-3035669-1	Saeed Ali Shah	Muhammad Fareed	Bannu	Recommended	Recommended
111.	11101-2880940-5	Sohail Khan	Abwali Shah	Bannu	Recommended	Recommended
112.	11101-8733837-1	Muhammad Nasir khan	Habib Ullah Khan	Bannu	Deficient in height by ¼ inch	Not Eligible
113.	11101-6566337-1	Farhan Khan	Tariq Khan	Bannu	Recommended	Recommended
114.	11101-4522684-7	Aamer Jehan	Sahar Zaman	Bannu	Recommended	Recommended
115.	11101-8282377-3	Aqib Javed Khan	Umar Ayaz Khan	Bannu	Recommended	Recommended
			Munawar Khan	Bannu	Recommended	Recommended
116.	11101-7078205-1	Waseem Ullah Jan	Saif Ullah Jan	Bannu	The candidate lacks fertility in his imaginations and fails to exercise his intelligence on practical side. He is under confident, displays anxiety and loses composure under stress. Overall does not come up to the requisite standard of selection.	Not Recommended
117.	11101-0713933-3	Zinat Ullah	Muhammad Anar Zaman Khan	Bannu	Not Recommended	Not Recommended
118.	11101-9907539-9	Siraj Ali Khan	Muhammad Hasan Khan	Bannu	Recommended	Recommended
				Bannu	Recommended	Recommended



 ABC



	11101-7391879-7	Wahab Ali Shah				
120.	11101-1543066-7	Ibrar Khan	Aftab Ali Shah	Bannu	Recommended	Recommended
121.	11101-1115105-5	Asim Hayat Khan	Dildar Khan	Bannu	Recommended	Recommended
122.	11101-8515081-5	Bahader Ali Khan	Sher Ayaz Khan	Bannu	Recommended	Recommended
123.	11101-3563277-5	Amir Faisal	Sher Ali Baz Khan	Bannu	Recommended	Recommended
124.	11101-6232416-9	Arif Ullah Khan	Jamal Khan	Bannu	Recommended	Recommended
125.	11101-2786717-5	Shaukat Ullah Khan	Ali Abbas Khan	Bannu	Recommended	Recommended
126.	11101-1141823-3	Nafid Ullah Khan	Muhammad Hakim Khan	Bannu	Recommended	Recommended
127.	11101-0488684-3	Sana Ullah	Qadar Zad Khan	Bannu	Recommended	Recommended
128.	11101-9437274-9	Abdul Haseeb Ahsan	Umer Ayaz Khan	Bannu	Recommended	Recommended
129.	11101-9648409-7	Shafiq Ur Rehman	Jan Alam Din	Bannu	Deficient in height by ¼ inch	Not Eligible
130.	11101-5262252-3	Sajad Khan	Waris Khan	Bannu	Recommended	Recommended
131.	11101-9978762-1	Tareef Ullah Khan	Bahader Nawaz Khan	Bannu	Recommended	Recommended
132.	11101-7452978-7	Khursheed Alam	Ghazi Mar Jan	Bannu	Recommended	Recommended
133.	11101-3023443-9	Muhammad Afnan	Asari Khan	Bannu	Recommended	Recommended
134.	11101-7816577-7	Ahmad Shah Zeb	Fazal Subhan	Bannu	Recommended	Recommended
135.	11101-2983648-7	Assad Ullah Khan	Zait Ullah Khan	Bannu	Recommended	Recommended
136.	11101-3377407-3	Amjad Ullah	Ghulam Habib Khan	Bannu	Recommended	Recommended
137.	11101-9813669-7	Hazrat Bilal Khan	Gul Hanan	Bannu	Recommended	Recommended
138.	11101-3760028-5	Abdur Rehman	Noor Ahmad Khan	Bannu	Recommended	Recommended
139.	11101-6496062-1	Musawir Ali Shah	Zangi Rehman	Bannu	Recommended	Recommended
140.	11101-9593776-1	Shah Fahad	Afsar Ali	Bannu	Recommended	Recommended
141.	11101-8753575-9	Abdul Rahman	Akhtar Zaman	Bannu	Recommended	Recommended
			Sarfaraz Khan	Bannu	Recommended	Recommended

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142.	11101-2942806-9	Faheem Ullah				
143.	11101-9732253-8	Nida Mahak (Female)	Muhammad Irfan	Bannu	Recommended	Recommended
144.	11101-8478011-9	Bilal Khan	Afzal Ahmad	Bannu	Recommended	Recommended
145.	11101-0970578-7	Zahoor Khan	Saif Ur Rahman	Bannu	Recommended	Recommended
146.	11101-4535166-5	Muhammad Nasir Khan	Nek Amal Khan	Bannu	Recommended	Recommended
147.	11101-1382288-7	Muhammad Tariq Khan	Muhammad Younis Khan	Bannu	Recommended	Recommended
148.	11101-6362715-1	Shakir Ullah Khan	Gull Rabaz Khan	Bannu	Recommended	Recommended
149.	11101-5022794-1	Nasir Khan	Atta Ullah Jan	Bannu	Recommended	Recommended
150.	11101-9265316-1	Iqtidar Ahmad	Rab Nawaz Khan	Bannu	Recommended	Recommended
151.	11101-8745731-5	Muhammad Biloor Khan	Mukhtiar Ahmad	Bannu	Recommended	Recommended
152.	11101-9882104-1	Irfan Ullah	Abdul Niaz Khan	Bannu	Recommended	Recommended
153.	11101-3853734-9	Tahir Ullah Khan	Amin Khan	Bannu	Recommended subject to "NOC" by FC (South) Frontier Corps, Khyber Pakhtunkhwa.	Recommended
154.	11101-3735364-1	Farhan Ullah Khan	Saif Ullah Khan	Bannu	Recommended	Recommended
155.	11101-3362776-5	Shoaib Nawaz Khan	Mir Shahzad Khan	Bannu	Recommended	Recommended
156.	11101-8039182-3	Bilal Khan	Qayyum Nawaz Khan	Bannu	Recommended	Recommended
157.	11101-6192638-7	Qaiser Khan	Mir Sarwar Jan	Bannu	Recommended	Recommended
158.	11101-2455565-9	Muhammad Yasir	Muhammad Ayaz Khan	Bannu	Recommended	Recommended
159.	11101-4226716-7	Asad Khan	Sheraz Khan	Bannu	Recommended	Recommended
160.	11101-4736850-7	Muhammad Waqar Khan	Muhammad Mobeen Khan	Bannu	Recommended	Recommended
161.	11101-3111789-5	Awab Khan	Shah Muhammad Khan	Bannu	Recommended	Recommended
			Muhammad Younis Khan	Bannu	Recommended	Recommended

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162.	11101-3225745-3	Shahzeb Ullah Khan	Atlas Khan	Bannu	Poor comprehension lacks applied intelligence and fails to tackle practical situation. He loses composure under stress and tends to fluster when faced with difficulties. Overall a weak candidate who is not fit to be inducted in Police department.	Not Recommended
163.	11101-7490371-1	Sham Niaz Khan	Shamtiaz Khan	Bannu	Recommended	Recommended
164.	11101-5749199-7	Muhammad Aamir	Gul Ahmad Khan	Bannu	Recommended	Recommended
165.	11101-9286388-1	Muhammad Zeeshan Khan	Muhammad Shah Nawaz Khan	Bannu	Recommended	Recommended
166.	11101-8695251-5	Muhammad Salman Khan	Mashal Nawaz Khan	Bannu	Recommended	Recommended
167.	11101-0218335-5	Nafid Khan	Ziladar Khan	Bannu	Recommended	Recommended
168.	11101-7904352-3	Farhad Ullah Khan	Inam Ullah Khan	Bannu	Recommended	Recommended
169.	11102-0358451-3	Asif Ullah	Bahar gull	Bannu	Recommended	Recommended
170.	11101-5064645-5	Muhammad Bilal	Anayt Ullah Khan	Bannu	Recommended	Recommended
171.	11101-1844565-5	Afaq Ahmad	Umer Nawaz Khan	Bannu	Deficient In height by ¼ inch	Not Eligible
172.	11101-6411661-3	Arif Ullah Khan	Saif Ullah Khan	Bannu	Recommended	Recommended
173.	11101-5187839-3	Sunaid Khan	Gul Muhammad Khan	Bannu	Recommended	Recommended
174.	11101-8073179-5	Naseem Ullah	Wazira Khan	Bannu	Recommended	Recommended
175.	11101-4469124-3	Zamin Ullah Khan	Muhammad Ishaq Khan	Bannu	Recommended	Recommended
176.	11101-8565178-1	Abid Ullah Shah	Hameed Ullah Shah	Bannu	Recommended	Recommended

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178.	11102-0364792-7	Muhammad Tahir Javid Khan	Zafar Ali Khan	Bannu	Recommended	Recommended
179.	11101-7080231-3	Muhammad Ilyas Khan	Karnal Khan	Bannu	Recommended	Recommended
180.	11101-7849591-7	Muhammad Umer	Rukh Niaz Khan	Bannu	Recommended	Recommended
181.	11101-6857166-1	Asad Khan	Mir Shahadat Khan	Bannu	Recommended	Recommended
182.	11102-0369859-7	Naqib Ullah	Haq Dad Khan	Bannu	Recommended	Recommended
183.	11101-2637917-5	Muhammad Riyan	Bakhtamir Khan	Bannu	Recommended	Recommended
184.	11101-7818265-3	Muntazer Hayat	Basharat Ali	Bannu	Recommended	Recommended
185.	11101-6004451-7	Sami Ullah Khan	Muhammad Darya Shah	Bannu	Recommended	Recommended
186.	11101-5429180-9	Rahmat Ullah Khan	Baseer Ud Din	Bannu	Recommended	Recommended
187.	11101-8740653-5	Salman Nasir	Noor Ali Khan	Bannu	Recommended	Recommended
188.	11101-4004588-7	Ashraf Khan	Abdul Wahab Nasir	Bannu	Deficient in height by 1 inch	Not Eligible
189.	11101-5757507-9	Hafeez Ullah	Ghulam Muhammad Din	Bannu	Recommended	Recommended
190.	11101-6103694-3	Inshad Ullah Khan	Rizwan Ullah	Bannu	Recommended	Recommended
191.	11101-3021702-5	Ahmad Ullah Khan	Farakh Zad	Bannu	Deficient in chest by 1x1 inch	Not Eligible
192.	11101-4913301-9	Ahmad Ullah Khan	Hadat Ullah Khan	Bannu	Recommended	Recommended
193.	11101-6606244-5	Zakir Ullah Khan	Imdar Ali Khan	Bannu	Recommended	Recommended
194.	11101-1552735-7	Shah Fahad Khan	Muhammad Riaz Khan	Bannu	Recommended	Recommended
195.	11101-1552735-7	Naeem Ullah Khan	Abn e Ayaz Khan	Bannu	Recommended	Recommended
196.	11101 4683206-9	Noor Niaz Khan	Wali Ayaz Khan	Bannu	Recommended	Recommended
196.	37402-5319178-9	Sakhi Ur Rehman (Police Son)	Kateem Khan	Bannu	Recommended	Recommended
197.	11101-3667753-1	Zubair Khan (Police Son)	Abdul Qayyum	Bannu	Recommended	Recommended

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	11201-0775522-5	Muhammad Fayaz (Police Son)	Mirza Ali Khan	Bannu	Deficient in height by ¼ inch	Not Eligible
199.	11101-7007590-9	Saqib Ullah Khan (Police Son)	Abdur Razaq Khan	Bannu	Recommended	Recommended
200.	11102-0345256-7	Umar Ijaz khan (Police Son)	Nawab Ali Khan	Bannu	Recommended	Recommended
201.	11101-6259027	Sonia (Female)	Ihsan Ullah khan	Bannu	Recommended	Recommended
202.	11101-8740041-3	Naseer Ullah Khan (Police Son)	Taseer Ullah Khan	Bannu	Recommended	Recommended
203.	11101-1669634-3	Amjid Khan (Police Son)	Beradar Khan	Bannu	Recommended	Recommended
204.	11202-0371561-7	Sadar Nawaz (Police Son)	Syed Nawaz	Bannu	Recommended	Recommended
205.	11101-9291335-9	Rizwan Ullah Khan (Police Son)	Noor Nawaz Khan	Bannu	Recommended	Recommended
206.	11101-5443258-7	Abu Talha (Police Son)	Noor Rahim Shah	Bannu	Recommended	Recommended
207.	11101-9843789-3	Haji Nawaz	Muhammad Nawaz Khan	Bannu	Recommended	Recommended
208.	11101-6053383-7	Masood Ihsan	Bayan Ullah	Bannu	Recommended	Recommended
209.	11101-8490302-5	Shah Zeb Khan	Wahid Gul	Bannu	Recommended	Recommended
210.	11101-8447200-1	Waqas Ahmad	Ayub Nawaz Khan	Bannu	Recommended	Recommended
211.	11101-0658733-5	Khateeb Ullah Khan	Rahmat Ullah Khan	Bannu	Recommended	Recommended
212.	11101-3617488-7	Muhammad Sohail khan	Bakhtiar Ali Khan	Bannu	Recommended	Recommended
213.	11101-8860699-7	Tahir Mehmood Khan	Barkat Ullah Khan	Bannu	This candidate was caught cheating in exam/test by using cell phone and confessed his malpractice in written test. He possesses doubtful integrity and likely to disregard moral principles. Not Recommended	Not Recommended

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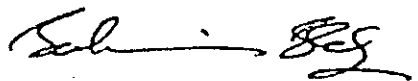
	11101-1193659-9	Sufian Ali Shah	Syed Moneer Shah	Bannu	Recommended	Recommended
215.	11101-5744686-9	Abdul Wahab Khan	Shadawlaz Khan	Bannu	Recommended	Recommended
216.	11102-0360271-3	Arif Ullah Khan	Allah Noor Khan	Bannu	Recommended	Recommended
217.	11102-0370622-9	Muhammad Asif	Asghar Khan	Bannu	Recommended	Recommended
218.	11101-2476492-7	Safir Ullah Khan	Farooq Khan	Bannu	Recommended	Recommended
219.	11101-3948036-7	Wasi Ullah Shah	Zar Ali Shah	Bannu	Recommended	Recommended
220.	11101-2436437-1	Farooq Khan	Gul Raip Khan	Bannu	Recommended	Recommended
221.	ABSENT	Jalal Hamid	Abdul Hamid	Bannu	ABSENT	ABSENT
222.	11101-8040108-5	Abdur Rauf Khan	Umer Gul Khan	Bannu	Recommended	Recommended
223.	11101-6378272-9	Hayat Ullah Khan	Shama Raz Khan	Bannu	Recommended	Recommended
224.	11101-2347479-9	Nafid Ullah Khan	Muhammad Wali Khan	Bannu	Recommended	Recommended
225.	11101-6945868-7	Aamir Gul	Mir Dal Khan	Bannu	Recommended	Recommended
226.	11101-3235895-5	Usman Khan	Dilawar Khan	Bannu	Deficient in height by ¼ inch	Not Eligible
227.	11101-2776762-1	Mati Ullah Shah	Muhammad Qasim Shah	Bannu	Recommended	Recommended
228.	11101-6331497-7	Kifayat Ullah Khan	Muhammad Wali Khan	Bannu	Recommended	Recommended


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	11101-1377268-7	Ahmad Khan	Shamsher Ali Khan	Bannu	Recommended	Recommended
230.	11101-6483964-1	Shahid Mehmood	Zafar Ali Khan	Bannu	Recommended	Recommended
231.	11101-9635554-3	Walid Khan	Maqsood Khan	Bannu	Recommended	Recommended
232.	11101-2271006-7	Muhammad Numan	Bahader Sher Khan	Bannu	Recommended	Recommended

RS

 Major Mian Muhammad Saleem Shah
 Senior Psychologist
 Member


 Mr. Abdul Ghafoor Afridi, PSP, PPM
 Regional Police Officer, Bannu
 Chairman

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 Mr. Yasir Afridi, PSP
 District Police Officer, Bannu
 Member


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Annexure B

ORDER


Having been recommended the following candidates by Educational Testing Evaluation Agency (ETEA) and approved them for appointment by Regional Selection Board, Bannu in light of instructions issued by CPO, Peshawar vide letter Endst: No. 9534-71/E-IV dated 02.10.2019, they are hereby appointed as Constable BPS-07 (10990-610-29290) against the sanctioned and existing vacant vacancies of Constables after completion of all codal formalities with immediate effect and allotted constabulary numbers noted against each their names.

S#	Name	Father name	Constabulary Number
1.	Bakht Nawaz Khan	Gul Dad Khan	1075
2.	Shahid Ullah Khan	Mamtaaz Khan	1111
3.	Naseeb Ullah Khan	Muhammad Ishaq Khan	1929
4.	Muhammad Sohail Khan	Muhammad Nawaz	491
5.	Muhammad Kamran Khan	Tehsil Khan	488
6.	Kirayat Ullah Khan	Anayat Ullah	2082
7.	Shahid Ali Khan	Sahib Zali Khan	1676
8.	Muhammad Haroon Khan	Ghulam Daud Khan	1683
9.	Sufian Ayaz	Raqiaz Khan	1344
10.	Mushtaq Ahmad	Ghulam Farooq Khan	1553
11.	Ashran Ullah Shah	Hidayat Ullah Shah	315
12.	Muhammad Ali Khan	Gul Mar Jan	15
13.	Arabi Khan	Ayaz	587
14.	Zaker Ullah Khan	Muhammad Usman	1059
15.	Mehtab Ali	Aftab Ali	1581
15.	Fahad Nawaz Khan	Mir Azad Khan	1504
17.	Wasiq Ahmad Khan	Aisar Zaman Khan	2076
18.	Amin Ullah	Aman Ullah Khan	2078
19.	Haroon Rashid	Aftab Zaman	2086
20.	Afnan Khan	Malik Wresham Khan	1894
21.	Muhammad Nasir Khan	Gul Zaman	1145
22.	Qayum Khan	Falak Naz Khan	348
23.	Fahim Ullah Khan	Umer Ayaz Khan	1619
24.	Arif Ullah Khan	Majo Khan	45
25.	Zakir Ullah Khan	Gul Banaf Shah	58
26.	Zamin Ullah Khan	Masrullah Jan	85
27.	Waseem Ullah	Umer Ali Khan	47
28.	Zia Ullah Khan	Ameen Ullah Khan	202
29.	Muhammad Asim Bakht	Bakhtabaz Khan	463
30.	Mohsin Ali Khan	Zahid Ali Khan	472
31.	Umer Farooq	Azmat Ali	602


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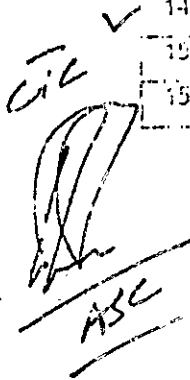
S#	Name	Father name	Constabulary Number
32.	Baz Muhammad Khan	Muhammad Yaqoob Khan	645
33. ✓	Saqib Ullah Inayat	Inayat Ullah Khan	669
34.	Wazir Ullah Khan	Shahid Khan	710
35.	Niaz Ali Khan	Khan	822
36.	Balqiaz Khan	Muhammad Biaz Khan	865
37.	Aamir Khan	Shoukat Ali Khan	895
38.	Rizwan Iqbal	Abdus Samad Khan	FRP
39.	Safi Ullah Khan	Muhammad Dar Ali Khan	FRP
40.	Mishkat Ullah	Raqeab Khan	FRP
41.	Muzamil Nawaz Shah	Bahadir Nawaz Shah	FRP
42.	Saqib Khan	Israr Khan	FRP
43.	Hameed Ullah	Khobaz Khan	FRP
44.	Ibn E Yameen Khan	Gul Nawab Khan	FRP
45.	Mudasir Ali Shah	Gul Kruban Shah	FRP
46.	Iqtidar Ali Shah	Rab Nawaz Shah	FRP
47.	Abid Ullah	Mamraiz Khan	FRP
48.	Irfan Ullah Khan	Ihsan Ullah Khan	FRP
49.	Sunaid Ali Shah	Mir Laiq Shah	FRP
50.	Asmat Ullah	Shan Gul	FRP
51.	Mir Zafar Shah	Mir Shahzade	FRP
52.	Yasir Ullah	Muhammad Rafiq	FRP
53.	Muhammad Bashir	Ghulam Qasim Dad	FRP
54.	Muhammad Tariq Khan	Humzar Ali Khan	FRP
55.	Waseem Rehman	Aziz Rahman	FRP
56.	Aamir Sohail Khan	Taj Ali Khan	FRP
57.	Alam Zos Khan	Akber Nawaz Khan	FRP
58.	Majeed Jr Rehman	Karam Ali Khan	FRP
59.	Shaheer Ullah Khan	Mir Ali Subhan	FRP
60.	Asif Ullah Shah	Naimat Ullah Shah	FRP
61.	Yousaf Amin	Amir Aman Ullah Khan	FRP
62.	Aftab Ullah	Hoor Ali Khan	FRP
63.	Khan Baz Khan	Dil Nawaz Khan	FRP
64.	Syed Mudasir Ali Shah	Muhammad Ajma. Khan	FRP
65.	Irfan Ullah	Hasnain Ali Khan	FRP
66.	Syed Sofian Ali Shah	Syed Hussain Ali Shah	FRP
67.	Majeed Ullah	Tot Jan	FRP
68.	Raham Dil Shah	Raqeab Shah	FRP
69.	Taimur Zaman	Bahadur Zaman	FRP
70.	Abdus Saboor Khan	Mahmood Khan	FRP
71.	Saqib Khan	Muhammad Shafiq	FRP

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S#	Name	Father name	Constabulary Number
72.	Hanif Ullah	Sher Abaz Khan	FRP
73.	Nauman Khan	Mehboob Khan	FRP
74.	Ihtisham Ahmad	Ahmad Nawaz	FRP
75.	Haroon Ali Shah	Usman Ali Shah	2097/CPEC
76.	Abdul Wahab Khan	Muhammad Shafiq	2092/CPEC
77.	Touseef Khan	Iqbal Khan	2093/CPEC
78.	Shaker Ullah Khan	Nazir Ullah Khan	2094/CPEC
79.	Wasim Ullah Khan	Asmat Ullah	2095/CPEC
80.	Nasir Ali Shah	Shahbar Ali Shah	2096/CPEC
81.	Fida Muhammad	Haider Khan	2097/CPEC
82.	Fahad Nawaz	Jan Baz Khan	2098/CPEC
83.	Arifad Khan	Barkat Ali Khan	2099/CPEC
84.	Tariq Aziz Khan	Mir Hamzad Khan	2100/CPEC
85.	Roman Ul Haq	Abdul Satar Khan	2101/CPEC
86.	Muhammad Sohail Khan	Kazar Khan	2102/CPEC
87.	Asif Khan	Ayub Khan	2103/CPEC
88.	Kashif Ullah	Akhtar Zaman	2104/CPEC
89.	Shahid Khan	Gul Sadat Khan	2105/CPEC
90.	Janshed Khar	Azad Khan	2106/CPEC
91.	Zaka Jilal Khan	Muhammad Ibrar Khan	2107/CPEC
92.	Abid Ullah	Nazar Ali	2108/CPEC
93.	Munir Shah	Arsalia Khan	2109/CPEC
94.	Muhammad Zohaib Khan	Sardaraz Khan	2110/CPEC
95.	Noor Salim	Arif Ullah	2111/CPEC
96.	Hizbullah Khan	Fazal Karim Khan	2112/CPEC
97.	Ibrar Khan	Muhammad Fareed	2113/CPEC
98.	Saeed Ali Shah	Abwali Shah	2114/CPEC
99.	Muhammad Nasir Khan	Tariq Khan	2115/CPEC
100.	Farran Khan	Sahar Zaman	2116/CPEC
101.	Aamer Jehan	Umer Ayaz Khan	2117/CPEC
102.	Aqib Javed Khan	Munawar Khan	2118/CPEC
103.	Zinat Ullah	Muhammad Anar Zaman Khan	2119/CPEC
104.	Siraj Ali Khan	Muhammad Hasan Khan	2120/CPEC
105.	Wahab Ali Shah	Aftab Ali Shah	2121/CPEC
106.	Ibrar Khan	Dildar Khan	2122/CPEC
107.	Asim Hayat Khan	Sher Ayaz Khan	2123/CPEC
108.	Bahacer Ali Khan	Sher Ali Baz Khan	2124/CPEC
109.	Amir Faisal	Jamal Khan	2125/CPEC
110.	Arif Ullah Khan	Ali Abbas Khan	2126/CPEC
111.	Shaukat Ullah Khan	Muhammad Hakim Khan	2127/CPEC


 ASC

S#	Name	Father name	Constabulary Number
112.	Rafid Ullah Khan	Qadar Zad Khan	2128/CPEC
113.	Sana Ullah	Umer Ayaz Khan	2129/CPEC
114.	Shafiq Ur Rahman	Waris Khan	2130/CPEC
115.	Sajad Khan	Bahader Nawaz Khan	2131/CPEC
116.	Tareef Ullah Khan	Ghazi Mar Jan	2132/CPEC
117.	Khurshed Alam	Asari Khan	2133/CPEC
118.	Muhammad Afnan	Fazal Subhan	2134/CPEC
119.	Ahmad Shah Zeb	Zait Ullah Khan	2135/CPEC
120.	Assad Ullah Khan	Ghulam Habib Khan	2136/CPEC
121.	Amjad Ullah	Gul Hanan	2137/CPEC
122.	Hazrat Bilal Khan	Noor Ahmad Khan	2138/CPEC
123.	Abdur Rehman	Zangi Rehman	2139/CPEC
124.	Musawir Ali Shah	Afsar Ali	2140/CPEC
125.	Shan Fanad	Akhtar Zaman	2141/CPEC
126.	Abd ur Rahman	Sarfraz Khan	2142/CPEC
127.	Faheem Ullah	Muhammad I-fan	2143/CPEC
128.	Mida Malak (Female)	Afzal Ahmad	2144/CPEC
129.	Bilal Khan	Saif-Ur Rahman	2145/CPEC
130.	Zahoor Khan	Nek Amal Khan	2146/CPEC
131.	Muhammad Nasir Khan	Muhammad Ycunis Khan	2147/CPEC
132.	Muhammad Tariq Khan	Gul Rabaz Khan	2148/CPEC
133.	Shakir Ullah Khan	Atta Ullah Jan	2149/CPEC
134.	Nasir Khan	Rab Nawaz Khan	2150/CPEC
135.	Iqtidar Ahmad	Mukhtiar Ahmad	2151/CPEC
136.	Muhammad Biloori Khan	Abdul Niaz Khan	2152/CPEC
137.	Irfan Ullah	Amin Khan	2153/CPEC
138.	Tahir Ullah Khan	Saif Ullah Khan	2154/CPEC
139.	Farhan Ullah Khan	Mir Shahzad Khan	2155/CPEC
140.	Shoaib Nawaz Khan	Qayum Nawaz Khan	2156/CPEC
141.	Bital Khan	Mir Sarwar Jan	2157/CPEC
142.	Qaiser Khan	Muhammad Ayaz Khan	2158/CPEC
143.	Muhammad Yasir	Sheraz Khan	2159/CPEC
144.	Asad Khan	Muhammad Mobeem Khan	2160/CPEC
145.	Muhammad Waqar Khan	Shah Muhammad Khan	2161/CPEC
146.	Awab Khan	Muhammad Younis Khan	2162/CPEC
147.	Sham Niaz Khan	Shamtiq Khan	2163/CPEC
148.	Muhammad Aamir	Gul Ahmad Khan	2164/CPEC
149.	Muhammad Zoeshan Khan	Muhammad Shah Nawaz Khan	2165/CPEC
150.	Muhammad Salman Khan	Mashaal Nawaz Khan	2166/CPEC
151.	Nasir Khan	Ziladar Khan	2167/CPEC


 ABC

S#	Name	Father name	Constabulary Number
152.	Fariad Ullah.khan	Inam Ullah Khan	2168/CPEC
153.	Asif Ullah	Bahar Gul	2169/CPEC
154.	M.Jhammad Bilal	Anayt Ullah Khan	2170/CPEC
155.	Aarif Ullah Khan	Saif Ullah Khan	2171/CPEC
156.	Sunaid Khan	Gul Muhammad Khan	2172/CPEC
157.	Naseem Ullah	Wazira Khan	2173/CPEC
158.	Zamin Ullah Khan	Muhammad Ishaq Khan	2174/CPEC
159.	Abid Ullah Shah	Hameed Ullah Shah	2175/CPEC
160.	Aamir Sohal Khan	Zafar Ali Khan	2176/CPEC
161.	Muhammad Tahir Javid khan	Kamal Khan	2177/CPEC
162.	Muhammad Ilyas Khan	Rukh Niaz Khan	2178/CPEC
163.	Muhammad Umer	Mir Shahadat Khan	2179/CPEC
164.	Asad khan	Haq Dad Khan	2180/CPEC
165.	Muqeeb Ullah	Bakhtamir Khan	2181/CPEC
166.	Muhammad Riyan	Basharat Ali	2182/CPEC
167.	Muntazer Hayat	Muhammad Darya Shah	2183/CPEC
168.	Sami Ullah Khan	Baseer Ud Din	2184/CPEC
169.	Rahmat Ullah Khan	Noor Ali Khan	2185/CPEC
170.	Asraf Khan	Ghulam Muhammad Din	2186/CPEC
171.	Fafeez Ullah	Rizwan Ullah	2187/CPEC
172.	Ahmad Ullah Khan	Hadaya Ullah Khan	2188/CPEC
173.	Zahir Ullah Khan	Imdar Ali Khan	2189/CPEC
174.	Sahid Faliad Khan	Muhammad Riaz Khan	2190/CPEC
175.	Naseem Ullah Khan	Abri E Ayaz Khan	2191/CPEC
176.	Noor Niaz Khan	Wali Ayaz Khan	2192/CPEC
177.	Sakni Ur Rehman (Police Son)	Kaleem Khan	2193/CPEC
178.	Zouar Khan (Police Son)	Abdul Qayyum	2194/CPEC
179.	Saqib Ullah Khan (Police Son)	Abdur Razaq Khan	2195/CPEC
180.	Umar Ijaz Khan (Police Son)	Nawab Ali Khan	2196/CPEC
181.	Sonia (Female)	Ihsan Ullah Khan	2197/CPEC
182.	Naseer Ullah Khan (Police Son)	Taseer Ullah Khan	2198/CPEC
183.	Arjed Khan (Police Son)	Beradar Khan	2199/CPEC
184.	Sadar Nawaz (Police Son)	Sayed Nawaz	2200/CPEC
185.	Rizwan Ullah Khan (Police Son)	Noor Nawaz Khan	2201/CPEC
186.	Au Talha (Police Son)	Noor Rahim, Shah	2202/CPEC
187.	Haji Nawaz	Muhammad Nawaz Khan	2203/CPEC
188.	Masood Ihsan	Bayan Ullah	2204/CPEC
189.	Shah Zeb Khan	Wahid Gul	2205/CPEC
190.	Waqar Ahmad	Ayub Nawaz Khan	2206/CPEC
191.	Khateeb Ullah Khan	Rahmat Ullah Khan	2207/CPEC

etc

 ASC

(31)

Sr.	Name	Father name	Constabulary Number
192.	Muhammad Sohail Khan	Bakhtiar Ali Khan	2208/CPEC
193.	Sufian Ali Shah	Syed Moneer Shah	2209/CPEC
194.	Abdul Wahab Khan	Shadawiaz Khan	2210/CPEC
195.	Anif Ullah Khan	Allah Noor Khan	2211/CPEC
196.	Muhammad Asif	Asghar Khan	2212/CPEC
197.	Safir Ullah Khan	Farooq Khan	2213/CPEC
198.	Wasi Ullah Shah	Zar Ali Shah	2214/CPEC
199.	Farooq Khan	Gul Raip Khan	2215/CPEC
200.	Abdur Rauf Khan	Umer Gul Khan	2216/CPEC
201.	Hayat Ullah Khan	Shama Raz Khan	2217/CPEC
202.	Walid Ullah Khan	Muhammad Wali Khan	2218/CPEC
203.	Aamir Gul	Mir Dil Khan	2219/CPEC
204.	Mati Ullah Shah	Muhammad Qasim Shah	2220/CPEC
205.	Kifayat Ullah Khan	Muhammad Wali Khan	2221/CPEC
206.	Ahmad Khan	Shansher Ali Khan	2222/CPEC
207.	Shahid Mehmood	Zafar Ali Khan	2223/CPEC
208.	Walid Khan	Maqsood Khan	2224/CPEC
209.	Muhammadi Numan	Bahader Sher Khan	2225/CPEC ✓

OS No.

2324

Dated:

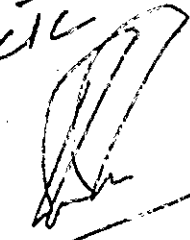
30/12/2019

District Police Officer
BannuNo. 20497-95 /Dated Bannu, the 31/12/2019.

Copy of above is submitted to the:-

1. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar w/r to his letter quoted above for favour of information and with the request to kindly issue transfer order from S.No. 38 to 74 from this District Police to FRP Bannu against the vacant posts of Constables in FRP please.
2. AIG Establishment CPO, Peshawar for favour of information please.
3. DIG Training CPC K.P.K, Peshawar for favour of information please.
4. Regional Police Officer, Bannu Region, Bannu w/r to CPO Peshawar letter No. quoted above for favour of information please.
5. SP/FRP Bannu Range, Bannu for information and further necessary action.
6. District Account Officer, Bannu
7. DSP/HQrs/HC/PO/SRC/OAS for necessary action.
8. All concerned.

District Police Officer
Bannu

etc

 Asc

Dr. Abdul Hameed Siddiqui

MD MBBS
Diploma in Family Medicine
Diploma in Geriatrics

(32)

ڈاکٹر عابدیہ از سنکندری

MD MBBS
Diploma in Family Medicine
Diploma in Geriatrics

Apr 24 11:50 AM

02/12/2011

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Complete Rest
21 days

ABDUL HAMEED SIDDIQUI
MD MBBS
Diploma in Family Medicine
Diploma in Geriatrics


Test taken 12/01/11

Syp: Mucin

Syp: Tovarfil

پتہ: ماہر پبلیکل سٹریٹ منٹاں روڈ

32
بج

ETC

 ASE

Dr. Abid Nawaz Sikandri

MD.RMP

DHMS Islamabad

0315-6525050

33
بیماریوں کے

ڈاکٹر عابد نواز سکندری

ایم ڈی، ایم بی بی ایس اسلام آباد
عابد نواز سکندری سٹریٹ اسلام آباد

P.Name: Aslam Age: 33 Sex: M Date: 16/11/2023

Clinical Record

Stomach
Lill

R
1. 8 water
100ml
2. Decc
3. 80ml
4. 80ml
5. 80ml

97 Cefepim 1x0.5

2. 100mg

Tramadol 97
17171

Tramadol
80mg

Caution
for Aspirin

ABID MEDICAL CENTRE
Dr. Abid Nawaz
17171
عابد نواز سکندری سٹریٹ اسلام آباد

Tab: Telvin 120mg

Syp: Mucin

Syp: Tevorfil

ASC

34

Annexure "D"

Disciplinary Action

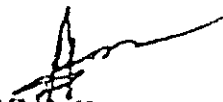
I, Superintendent of Police, Admin & Minority, Special Security Unit (CPEC) Peshawar as a competent authority, am of the opinion that Constable Zeeshan No 2417 of SSU (CPEC), has rendered him-self liable to be proceeded against under the provision of Police Disciplinary Rules-1975.

STATEMENT OF ALLEGATION

"That Constable Zeeshan No. 2417 while posted at Upper Kohistan had absented himself from lawful duties w.e.f. 22.03.2023 till date without any sanctioned leave or intimation, received vide DSP Hazara Region letter No. 133/SSU/Reader, dated 27.04.2023. Being part of the Disciplined Force, this act of his is against the Police Rules & shows gross misconduct on his part".

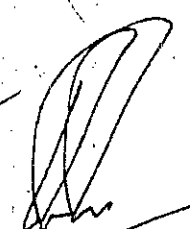
For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and Mr. Muhammad Saeed DSP Hazara Region is appointed as enquiry officer.

1. The Enquiry Officer shall, in accordance with the provisions of the Ordinance, provide reasonable opportunity of hearing to the accused officer, record his finding within 15 days of the receipt to this order, make recommendations as to punishment or other appropriate action against the accused.
2. The accused shall join the proceeding on the date time and place fixed by the Enquiry Officer.


(FAZAL HANIF)
SP Admin & Minority SSU (CPEC).
Khyber Pakhtunkhwa Peshawar.

No. 1424 /EC, dated Peshawar the 07/05/2023

1. Enquiry Officer is directed to finalize the aforementioned departmental proceeding within stipulated period under the provision of Police Rules-1975.
2. Official Concerned.


ASC

Scanned with CamScanner



جنا عالی

حوالہ شمورہ ڈسپنڈری ایکشن ایف 1424/EC حورہ 09/23

قاریہ بنا SP/Adm & Minority صاحب صوبہ سرحد پورنجوان پشاور
SSU (CPEC)
موضوع حورہ کہ سن سائنس پیر الزامات علامہ کے لئے جس کے آئین
دوران تیناں مقام پور کوستان حورہ 22/23 سے تاحال سرکاری
ڈیوٹی سے قصداً غیظاً فریاد ہوئے ہیں۔

جنا عالی! بالا الزامات کے جواب میں تفصیلاً عرض ہے کہ

سن سائنس کا تبادلہ حورہ 10/23 کو حسب اسکیم فی ایف ان بالا صوبہ
ضلع پور کوستان کو ہو کر خورہ اسکیم کی عمل کر کے لے چکے تیناں
پہ حاضر کی رپورٹ کی سبب بدقسمت سے سائنس کی طبیعت
نہایت نامیاز ہو کر کئی عیبتیں برپا ہوئی ہیں۔ سائنس کے حوالے پر
ایڈوائس عیبت کے حوالے شروع کیا گیا جوئی آفاقہ لپیٹ نہ سکا
اور سائنس کی طبیعت روز بروز بگڑتی گئی جو اس حالت کے
پیش نظر سائنس نے با آزر جہوری درخواست مابین تہ تہوری
رضعت بلا لائن حورہ کو بھجوائی اور خود گھر پر آکر عیبتی طور پر
ڈاکٹر صاحب سے عیبت کے حوالے شروع کر کے جناب ڈاکٹر صاحب
نے مکمل آرام کا مشورہ دیا۔ (ڈاکٹر کی طبیعت تہ تہ حورہ لے کر
سائنس کی طبیعت میں قدر بہتری کے بعد خورہ حاضر کی رپورٹ
معالجہ! سائنس قصداً غیظاً فریاد نہیں ہوا ہے بلکہ با آزر جہوری احمد شہزاد
بیماری (ہیپاٹائٹس) کے باعث غیظاً فریاد ہوا ہے۔

لینڈ اسٹیٹ عیبت سائنس کی عیبت غیظاً فریاد کو مکمل طور پر
کرنے اور مابین پورنجوان کو مکمل طور پر عیبت ہوا ہے
سائنس FC ذیلیان 2417 حقیقہ بلا لائن ای کو پورنجوان
سائنس و عیبت پورنجوان

etc
ABC

(36)

"F"

FINAL SHOW CAUSE NOTICE

I Superintendent of Police, Admin & Minority, Special Security Unit
CPEC, Peshawar, as competent authority, under the provision of police Disciplinary
Rules 1975 do hereby serve upon you, Constable Zeeshan No. 2417 final show cause
notice.

The Enquiry Officer, Mr. Muhammad Saeed Khan DSP Hazara Region SSU
CPEC after completion of departmental proceedings, has found you guilty of the
charges/allegations leveled against you in the charge sheet/statement of allegation &
recommended for you Constable Zeeshan No. 2417 suitable punishment.

And whereas, the undersigned is satisfied that you Constable Zeeshan No.
2417 deserve the punishment in the light of the above said enquiry papers.

I, competent authority, have decided to impose upon you the penalty of
minor/major punishment under police Disciplinary Rules 1975.

You are, therefore, required to show cause as to why the minor/major penalty
should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply to this notice is received within 07 days of its receipt, in normal
course of circumstances, it shall, be presumed that you have no defense to put in and in
that case ex-parte action shall be taken against you.

(FAZAL HANIF)
SP Admin & Minority SSU (CPEC),
Khyber Pakhtunkhwa Peshawar

12/07/2023

2751 JEC dated Peshawar the 12/07/2023.

Copy to official Concerned.

CIC
ASC

52 days - 1
Increment

جواباً


سوال نمبر 285/E

صوفیاء دینداروں! جناب SP ایڈمن اینڈ مائنسٹری ایس ایس ایو
سی بی کے لیے درخواستیں اور صاحب معروضین خدمت میں
کہ میرا جوابی جواب ہے جو قبل از میں چارج شیٹ / سہری آف
ایریڈیشن کے ساتھ لکھا گیا ہے۔

لیڈر اسٹیٹ کے مسائل کے خلاف جاری شدہ
فائنل شو کاز نوٹس اور انکو اثری بلا مندی کاروائی داخل
رفتہ فرما جانے کا حکم صادر فرماوے۔
سائل تاحد دعا گورجے گا۔
سوزش ہوگی۔

صوفیاء 19/07/2023

العارضین = 2-8
سائل کریٹیل محمد زیشان خان بلوچ نمبر 247/SSW
پلاٹون (A) ہتلع ہون
مقامیہ (442P) ہتلع ہون

آف

ASC

(38)

Annexure "H"



OFFICE OF THE COMMANDANT
SPECIAL SECURITY UNIT (SSU)
KHYBER PAKHTUNKHWA POLICE

CENTRAL POLICE OFFICES, S.A.Q ROAD, PESHAWAR CANTT (PH: 091-9214056)

No. 3786-99 EC/SSU,

dated Peshawar the 17/08/2023.

ORDER

This order will dispose the formal departmental inquiry against Constable Muhammad Zeeshan Khan No. 2417 of Special Security Unit (CPEC), District Bannu.


Brief facts of the case are that as reported by DSP Hazara Region vide letter no. 133/SSU/Reader, dated 27.04.2023 that Constable Muhammad Zeeshan Khan No. 2417 while posted at Lower Kohistan had absented himself from his lawful duties w.e.f 22.03.2023 to 04.07.2023 (104 days) & once again from 06.07.2023 to 01.08.2023 (26 days) for a total period of 130 days without any sanctioned leave or intimation.

In this regard, his pay was stopped and proper departmental proceeding was initiated against him. He was issued charge sheet & summary of allegation vide this office Endst: No. 1424/EC, dated 09.05.2023 and Mr. Muhammad Saeed Khan DSP Hazara Region SSU (CPEC) was nominated as enquiry officer to conduct inquiry into the matter and submit findings report. After completion of all codal formalities, enquiry officer submitted his findings report, wherein he reported that the charge sheet was served upon the constable to which he replied that he was ill due to which he remained absent from duty, in support of which he also produced medical prescriptions from a private doctor, which is unacceptable as per police rules. Thus, the enquiry officer did not found his reply satisfactory & recommended him for suitable punishment.

Later on he was issued/served with final show cause notice vide this office No. 2851/EC, dated 12.07.2023 to which he replied the same as above. He was also heard in orderly room in person by the undersigned & given ample opportunity to proof himself innocent of the charges leveled against him but failed to satisfy the undersigned.

Keeping in view all the above facts as well as recommendation of enquiry officer & material available on record, the above named constable had deliberately absented himself from lawful duties. Therefore, I, Superintendent of Police, Admin & Minority Wing SSU (CPEC), being the competent authority in the exercise of powers vested to me under section 5(4) of Khyber Pakhtunkhwa, Police Rules 1975 (amended in 2014) hereby awarded him major punishment of "Dismissal from Service" and his absence period of 130 days is treated as leave without pay and the Accountant SSU HQrs: is directed to reckon & recover the amount if paid to him during his absence alongwith Basic Recruit Course charges accordingly.

GB No. 1039
Dated 17/08/2023


(FAZAL HANIF)
SP Admin & Minority SSU (CPEC),
Khyber Pakhtunkhwa, Peshawar.

Copy of the above is forwarded for information to the:

17-08-2023

1. Accountant General, Khyber Pakhtunkhwa.
2. District Police Officer, Bannu.
3. Director ETEA, KPK Peshawar with the request to black list his CNIC No. 15302-6486204-3 from any Government Job in future until he submit pending dues/charges.
4. DSP Bannu & Hazara Region SSU (CPEC), Khyber Pakhtunkhwa.
5. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
6. PA to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
7. Accountant, SRC, LO, OASI, I/C HRMS, I/C KOT and Clothing Godown SSU (CPEC).
8. Official Concerned.

etc

ASC

39

Annexure 1

BEFORE THE DEPUTY COMMANDANT SSU CPEC KHYBER
PAKHTUNKHWA, PESHAWAR;

SUBJECT: DEPARTEMENTAL APPEAL OF THE APPELLANT MUHAMMAD ZEESHAN KHAN NO 2417 PLATOON NO 51 BANNU CPEC AGAINST THE ORDER NO 3786-99 AND OB No 1039 DATED 17-08-2023 PASSED BY SP ADMIN & MINORITY SSU CPEC KP PESHAWAR WHERE BY THE APPELLANT HAS BEEN DISMISSED FROM SERVICE UNDER THE POLICE RULE 1974 (AMENDED IN 2014).

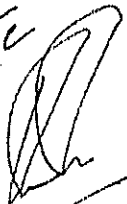
Prayer:

On Acceptance Of This Appeal, The Impugned Dismissal Order May Very Kindly Be Set Aside By Re Instating The Appellant In Service With Full Back Benefits And Treating This Alleged Absence In Sanction Leave With Retrospective Effect.

Respected Sir,

The appellant respectfully submits as under

1. That the appellant is functioned as constable since more than 3 years and is qualified M.A, LLB & DIT.
2. That the platoon from Bannu was shifted and the appellant was also posted as to lower kohistan who accordingly submitted his arrival but due to force magury he became severe sick and submitted his medical report to his immediate boss as he was completely unable to perform his duty at kohistan. Hence shifted to his home at Bannu.
3. The act due to such facts the appellant was marked absent and indeed the impugned order of dismissal and as such the instant appeal inter alia on the following grounds.
 - That the impugned order is totally miss conceived more over the penalty is obviously harsh and against the principle of justice and therefore liable to be set aside in the interest of justice.
 - That the impugned order of dismissal is obviously arbitrarily and discriminatory both in law and fact.

TC

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- That though the appellant has already submitted his medical sickness certificates but not been properly appreciated nor the appellant has been heard in person and as such the principles of Audi alterem preterm has been violated.
- That the service record of the appellant is un blemished, spotless and up to the entire satisfaction of his superior moreover the high qualifications and the carrier of the appellant may very kindly be looked into for the sake of mercy and justice.

It is, therefore respectfully prayed that the impugned order of dismissal may very kindly be set aside as prayed of in the head note of this appeal.

Dated: 29/08/2023


Yours obedient,



Muhammad zeeshan khan
No 2417 platoon 51 ssu/cpec
Mob No. 0336-9731760

1. Copy to the honorable commandant for information and any lawful action for the sack of justice .

Note (appeal consist of two pages)

etc

ASC



OFFICE OF THE COMMANDANT
SPECIAL SECURITY UNIT (SSU)
KHYBER PAKHTUNKHWA POLICE

CENTRAL POLICE OFFICERS, S.A.Q ROAD, PESHAWAR CANTT (PH: 091-9311036)



No. 4570-72/EC.

dated Peshawar the 20/09/2023

ORDER

This order will dispose of the formal departmental appeal preferred by ex-constable Muhammad Zeeshan Khan No. 2417 of Special Security Unit (CPEC) against the order of SP Admin SSU (CPEC), wherein he was awarded major punishment of "Dismissal from Service" on the allegations that he had absented himself from his lawful duties w.e.f. 22.01.2023 to 04.07.2023 (104 days) & once again from 06.07.2023 to 01.08.2023 (26 days) for a total period of 130 days without any sanctioned leave or intimation.

In this regard, proper departmental inquiry was carried out. He was issued/served with charge sheet and summary of allegation. After completion of inquiry, the enquiry officer reported that the accused ex-constable stated in his reply that he was ill & produced medical prescriptions from a private doctor. The enquiry officer did not find his reply satisfactory & recommended him for suitable punishment.

Later on he was issued/served with final show cause notice to which he replied the same. He was also heard in person in orderly room by SP Admin & Minority and given him ample opportunity but he failed to satisfy the competent authority.


In the light of recommendation of enquiry officers and other material available on the record, he was awarded major punishment of "Dismissal from Service" vide order No. 3786-99/EC, dated 17.03.2023.

Feeling aggrieved against the impugned orders of SP Admin & Minority SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 12.09.2023.

During the course of personal hearing, the applicant failed to prove himself innocent of the charges leveled against him. Furthermore, 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. There doesn't seem any infirmity in the order passed by the competent authority, therefore, no ground exist to interfere in same.

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

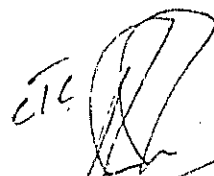
Order announced.


(ADUR RASHID) SP
Deputy Commandant,
Special Security Unit (CPEC),
Khyber Pakhtunkhwa,
Peshawar.

20-9-23

Copy of the above is forwarded for information to the:

1. SP Admin & Minority SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
2. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
3. Reader to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
4. Ex-Constable Muhammad Zeeshan No. 2417.


CFC
ASC

سروس ٹریڈنگ کمپنی پرائیویٹ لمیٹڈ
12 اکتوبر 2023ء پنجاب اینڈ لٹ
محمد زیشان خان نام برائے افسر پولیس (194) نمبر

بعدالت
مورد
مقدم
کچھ
سختی

سروس ٹریڈنگ
باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان بالا میں اپنی طرف سے واسطے بیروی و جواب وہی وکل کاروائی متعلقان مقام بمبئی کیلئے
محمد شاہ نواز خان گندوی، محمد عثمان کھان، شہزادہ کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی
کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ تقرر ثالث و فیصلہ پر حلف دینے جو اب وہی اور اقبال دعویٰ اور بصورت
ڈگری کرانے اجراء اور وصولی چیک، روپیہ اور عرضی اور درخواست ہر قسم کی تصدیق ذرا اس پر دستخط کرنے کا اختیار ہوگا۔ نیز
بصورت ڈگری کرانے اجراء اور وصولی چیک، روپیہ اور عرضی اور درخواست ہر قسم کی تصدیق ذرا اس پر دستخط کرنے کا اختیار ہو
گا۔ نیز بصورت عدم بیروی یا ڈگری یک طرفہ یا ایبل کی برآمدگی اور منسوخی دائر کرنے ایبل نگرانی و نظر ثانی و بیروی کرنے
کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے کسی اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا
کوئی اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکور بالا اختیارات حاصل ہوں گے اور اس کا ساختہ
و پرداختہ جس منظور قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہرجانہ اتوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل
صاحب موصوف ہوں گے۔ نیز بقایا خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا پیشی
سے باہر تو وکیل صاحب پابند نہ ہوں گے کہ بیروی مقدمہ مذکور کریں۔ نیز اگر بھی وجہ مثلاً بیماری، معذوری، عطلت وغیرہ
کی وجہ سے غرضی یا مستقبل بیروی مقدمہ نہ کر سکیں تو بھی وکیل صاحب یا اس کے لواحقین کو بقایا فیس (اگر کوئی ہے) ادا
کرنے کا اہل پابند ہوگا اور ادا شدہ فیس کی واپسی کا تقاضہ کرنے کا حق نہیں ہوگا۔ مضمون وکالت نامہ سن اور کچھ کردکالت
نامہ لکھ دیا تاکہ سند رہے۔

Attested & accepted

ASC

Bc-09-0174

0300.5760612

2023

العبد

12 اکتوبر

گواہ شدہ

12

المرقوم

العبد