


# FORM OF ORDER SHEET

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

**Appeal No. 2574/2023**

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge  |
|-------|---------------------------|---|
| 1     | 2                         | 3   |
| 1     | 12/12/2023                | <p>The appeal of Mr. Nawar Khan resubmitted today by Mr. Saadullah Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ . Parcha Peshi is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p><br/>REGISTRAR</p> |

The appeal of Mr. Nawar Khan received today i.e on 05.12.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/ marked with annexures marks.
- 2- Affidavit is not attested by the Oath Commissioner.
- 3- Annexures of the appeal are unattested.
- 4- Check list is not attached with the appeal.
- 5- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3793 /S.T,

Dt. 6/12 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Saadullah Khan Marwat Adv.  
High Court Peshawar.

Sir

Re-submitted after removing  
the objections.



12/12/23

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

S.A No. 2574 / 2023

Nawar Khan

versus

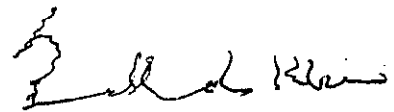
D.P.O & Others

**I N D E X**

| S. No | Documents                               | Annex | P. No. |
|-------|---|-------|--------|
| 1.    | Memo of Appeal                          |       | 1-4    |
| 2.    | KP Levies Force Act, 2019               | "A"   | 5-8    |
| 3.    | Charge Sheet & Statement of Allegations | "B"   | 9-10   |
| 4.    | Final Show Cause Notice                 | "C"   | 11     |
| 5.    | Dismissal order dated 23-09-2022        | "D"   | 12     |
| 6.    | Representation                          | "E"   | 13     |
| 7.    | Rejection order dated 08-11-2023        | "F"   | 14     |
| 8.    | Application for copies dated 23-11-2023 | "G"   | 15     |

Appellant

Through



Saadullah Khan Marwat  
Advocate.

21-A Nasir Mansion,  
Shoba Bazaar, Peshawar.

Ph: 0300-5872676

0311-9266609

Dated.05-12-2023

**BEFORE KPK SERVICE TRIBUNAL PESHAWAR**

S.A No. 2574 / 2023

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 9687

Dated 05-12-2023

Nawar Khan S/O Gul Sanat Khan,  
R/O Shawa Mali, Shah Qabal Khel,  
Miran Shah District North Waziristan.

Ex-Constable. No. 440, Police

Line Miranshah . . . . . Appellant

**'VERSUS'**

1. District Police Officer,  
North Waziristan.
2. Regional Police Officer,  
Bannu Region Bannu . . . . . Respondents

⊕<=>⊕<=>⊕<=>⊕<=>⊕

**APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974  
AGAINST O.B NO. 1175 DATED 23-09-2022 OF R. NO.  
01 WHEREBY MAJOR PUNISHMENT OF DISMISSAL  
FROM SERVICE FROM THE DATE OF SUSPENSION  
WAS IMPOSED UPON APPELLANT RETROSPECTIVELY  
OR OFFICE ORDER NO. 3924 / EC DATED 08-11-2023  
OF R. NO. 02 WHEREBY REPRESENTATION OF  
APPELLANT WAS REJECTED:**

⊕<=>⊕<=>⊕<=>⊕<=>⊕

**Respectfully Sheweth;**

1. That appellant was initially appointed as Levy Constable in the year 2007 and was serving as such to the best interest of the department.
2. That process of merger was initiated in the year 2018, when in the meanwhile all Levies Personnel's of erst while FATA was merged into Police Department through an Act known as KP

Levies Force Act, 2019 and brought them on the strength of the said department for regulating and administrating their services. (Copy as annex "A")

3. That charge of absence was leveled against appellant as under:-
  - i. That you have absented yourself intentionally from your official duty. It has come through reliable sources that you have been gone abroad without any permission.
  - ii. This all speaks of gross misconduct on your part and liable to be punished under Rules 1975 / service rules and disciplines.
4. That Charge Sheet of the aforesaid allegation was issued to the appellant but the same was not served upon him directly, so could not reply the same by him. (Copies as annex "B")
5. That enquiry into the matter was initiated but the same was not conducted as per the mandate of law and after its conclusion, appellant as per his knowledge was recommended for major punishment.
6. That on 08-09-2022, appellant was served with Final Show Cause Notice which was not replied due to none availability of him. (Copy as annex "C")
7. That on 23-09-2022, major punishment of dismissal from service from the date of suspension, i.e. retrospectively was imposed upon him by R. No. 01. (Copy as Annex "D")
8. That thereafter appellant submitted representation before R. No. 02 for reinstatement in service with all back benefits which was rejected on 08-11-2023 and the aforesaid punishment of dismissal from service was maintained. (Copy as Annex "E" & "F")
9. That on 23-11-2023, appellant submitted application before R. No. 01 for supply of the documents mentioned therein but in vain. (Copy as annex "G")

10. That in similar circumstances, R. No. 02 after submission of departmental appeals, reinstated dozens of constables Bahmal and Noor Muhammad etc. into their services record of which is with the department. Appellant was not treated at par with them.

Hence this appeal, Inter alia, on the following grounds:

**GROUND S:**

- a. That appellant was enlisted in service in the year 2007 and served the department till the date of dismissal from service.
- b. That prior to the merger of the Levis personnel's into police force, appellant served the department through himself or through his alternate i.e. Iwazi (means surrogate member of the Khasadar Force, who is actually performing duties in place of a member of the Khasadar Force and is getting full or split remuneration of the services rendered, whereas the salary is still drawn in name of the one in whose place he is performing such duties in the Khasadar Force. KP Khasadar Force Act, 2019)
- c. That at the time of dismissal from service appellant was deputed for service to Police Line Miranshah.
- d. That as and when appellant was called for duty, he assumed the same and was then serving the force, so there was no need of his dismissal from service.
- e. That since decades the area is especially in the clutches of miscreants and till date such phenomena exists by kidnapping, killing, bombing and destroying Government assets for no legal reason but for the lust of the miscreants.
- f. That appellant was dismissed from service on 23-09-2022 by R. No. 01 from the date of suspension, retrospectively while no order could be given retrospective effect.
- g. That in the circumstances, the department reinstated numerous constables, etc. into their services and appellant was not treated at par with co-employees similarly and equally placed.
- h. That absence does not constitute any misconduct when the same is not willful and as stated earlier, hundreds and thousands similarly and

equally placed employees have been reinstated into their services not only by the department but also by the hon'ble Tribunal / courts which judgments were upheld by the apex court.

- i. That no administrative order could be affected with retrospective effect as is done in the case in hand. The impugned orders are ab-initio-void and have no legal value.
- j. That codal formalities enumerated in the Rules were never observed, being mandatory. The impugned orders are not per the mandate of Law and based on malafide.

It is, therefore, most humbly prayed that on acceptance of appeal, orders dated 23-09-2022 and 08-11-2023 of the respondents be set aside and appellant be reinstated in service with all consequential / back benefits, with such other relief as may be deemed proper and just in circumstances of the case.

Appellant

Through

Saadullah Khan Marwat

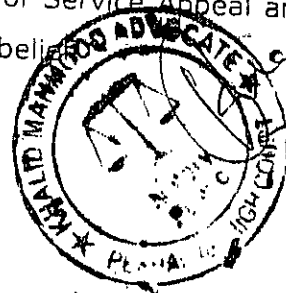
Arbab Saiful Kamal

Advocates.

Dated.05-12-2023

**AFFIDAVIT**

I, Nawar Khan S/O Gul Sanat (Appellant), do hereby solemnly affirm and declare that contents of Service Appeal are true and correct to the best of my knowledge and belief.



DEPONENT

**CERTIFICATE:**

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

ADVOCATE

A S

An  
Act

*to provide for the maintenance of Khyber Pakhtunkhwa  
Levies Force and to enable its transition  
to Khyber Pakhtunkhwa Police.*

**WHEREAS** after Constitution (Twenty-fifth Amendment) Act, 2018 (Act No. XXXVII of 2018), the erstwhile Federally Administered Tribal Areas have been merged in the Province of the Khyber Pakhtunkhwa, and Federal Levies Force, established under the Federal Levies Force Regulation, 2012, working in the said areas, has lost its legal status for working in the merged districts and sub-divisions;

**AND WHEREAS** it is in the best public interest to allow the Federal Levies Force to continue its functions in the merged districts and sub-divisions and to regulate and maintain it under the administrative control of the Government of Khyber Pakhtunkhwa;

**AND WHEREAS** to achieve the objectives it is expedient to give legal status to the Federal Levies Force in the merged districts and sub-divisions and to re-visit its institutional structure and functional assignment for effective discipline, better performance and optimal utility;

It is hereby enacted as follows:

**1. Short title, application, extent and commencement.**---(1) This Act may be called the Khyber Pakhtunkhwa Levies Force Act, 2019.

(2) It shall apply to all the members of Levies Force.

(3) It shall extend to the districts and sub-divisions of the Province of Khyber Pakhtunkhwa as provided in the Schedule.

(4) It shall come into force at once.

**2. Definitions.**---In this Act, unless there is anything repugnant in the subject or context,-

(a) "Code" means the Code of Criminal Procedure, 1898 (Act of V of 1898);

(b) "Commandant" means the Commandant of the Levies Force;

(c) "Department" means the Home and Tribal Affairs Department of the Government of Khyber Pakhtunkhwa;

(d) "Deputy Director General" means the Deputy Director General of the Levies Force;

(e) "Director General" means the Director General of the Levies Force;

(f) "Government" means the Government of the Khyber Pakhtunkhwa;



- (g) "Levies Force" means the Federal Levies Force, established under the repealed regulation and re-constituted, regulated and maintained under this Act;
- (h) "Police" means the Khyber Pakhtunkhwa Police;
- (i) "prescribed" means prescribed by rules;
- (j) "Provincial Police Officer" means the Provincial Police Officer of Khyber Pakhtunkhwa Police;
- (k) "public agency" means any department of Government, attached department, public authority, commission or autonomous body, setup under any statutory instrument, or public sector company or body corporate, owned, controlled or financed by Government;
- (l) "repealed regulation" means the Federal Levies Force Regulation, 2012, repealed under section 15 of this Act;
- (m) "rules" mean rules made under this Act; and
- (n) "Schedule" means the Schedule appended to this Act.

**3. Reconstitution and maintenance of Levies Force.**---(1) On commencement of this Act, the Levies Force shall be re-constituted and maintained by Government in accordance with the provisions of this Act and shall be known as the Khyber Pakhtunkhwa Levies Force, consisting of-

- (a) the Director General;
- (b) the Deputy Director General;
- (c) the Commandant; and
- (d) all existing strength of members of the Levies Force working in the merged districts and sub-divisions, as specified in the Schedule.

(2) The Director General, Deputy Director General and the Commandant shall be the officers of the Police.

(3) The District Police Officer shall be assigned the additional charge of the Commandant in the same district.

(4) The Regional Police Officer shall be assigned the additional charge of the Deputy Director General in their Police Region.

(5) The Deputy Director General, who shall be appointed by Government, in consultation with the Provincial Police Officer, in such manner and on such terms and conditions as may be prescribed.

**Explanation:** For the purpose of this section, Regional Police Officer and District Police Officer shall have the same meanings as are given to them, respectively, in the Khyber Pakhtunkhwa Police Act, 2017 (Khyber Pakhtunkhwa Act No. II of 2017).

**4. Superintendence, administration and control of the Levies Force.**---(1) The overall power of superintendence of the Levies Force shall vest in Government.

(2) The general administration and operational control of the Levies Force shall vest with the Director General to be exercised by him either directly or through the Commandant in the district.

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5. **Powers and duties of the Levies Force.**---(1) Notwithstanding anything contained, in any other law for the time being in force, the Levies Force shall have the parallel policing powers as are assigned to the Police under the Code.
- (2) Without prejudice to the generality of the forgoing policing powers under sub-section (1), the Levies Force shall perform such institutional or organizational functions and duties as provided under the Khyber Pakhtunkhwa Police Act, 2017 (Khyber Pakhtunkhwa Act No.II of 2017).
6. **Liabilities of officers and members of the Levies Force.**---(1) It shall be the duty of every member of the Levies Force to obey and execute all lawful orders and instructions, issued to him by the Commandant or any other officer authorized by him in this behalf to issue such orders and instructions.
- (2) The Levies Force shall be an essential service and every member thereof shall be liable to serve whenever he is required to serve by the Director General.
7. **Constitution of Selection and Promotion Committees.**---Government shall notify the Selection and Promotion Committees for recruitment and promotion of employees of the Levies Force.
8. **Postings, transfers and distribution of the Levies Force.**---(1) The Commandant shall be competent to post and transfer members of the Levies Force within the district.
- (2) The Director General shall be competent to post and transfer members of the Levies Force from one district to another.
- (3) Subject to the decision of the Department, a sufficient number of members of the Levies Force shall be placed at the disposal of the District Administration in performing its legally mandated functions.
9. **Absorption.**---(1) Notwithstanding anything, contained in any other law for the time being in force, the members of the Levies Force may be absorbed in the Police, subject to the procedure as may be determined by Government.
- (2) Until their absorption in the Police, the members of the Levies Force shall be governed by their existing terms and conditions of service under the Federal Levies Force (Amended) Service Rules, 2013.
10. **Assistance and support to Government functionaries.**---On the requisition of the District Administration, the Commandant shall provide assistance and support to the District Administration and Heads of all public agencies in the District, required for performing their official duties.
11. **Power to make rules.**---Government may make rules for carrying out the purposes of this Act.
12. **Act to override other laws.**---The provisions of this Act shall be in force notwithstanding anything repugnant or contrary contained in any other law for the time being in force.
13. **Indemnity.**---Except as otherwise expressly provided in this Act, no suit, prosecution or other legal proceedings shall lie against any member of the Levies Force, Government or any other authority for anything which is done in good faith or intended to be done under this Act or the rules.

**Explanation:** The phrase "good faith" shall have the same meaning as given to it in section 52 of the Pakistan Penal Code, 1860 (Act No.XLV of 1860).

8

14. **Removal of difficulties.**---If any difficulty arises in giving effect to any of the provisions of this Act, the Department may notify a committee to take a decision not inconsistent with the provisions of this Act, as may appear to it to be necessary for the purpose of removing the difficulty.

15. **Repeal and savings.**---(1) The Federal Levies Force Regulation, 2012 and the Khyber Pakhtunkhwa Levies Force Ordinance, 2019 (Khyber Pakhtunkhwa Ordinance No. III of 2019) are hereby repealed.

(2) Notwithstanding the repeal of the Federal Levies Force Regulation, 2012, under sub-section(1), the Federal Levies Force (Amended) Service Rules, 2013 shall continue to remain in force and the terms and conditions of service of all the members of the Levies Force shall be governed thereunder until new rules are made under this Act.

(3) Anything done, action taken, rule made or notification or orders issued under the Khyber Pakhtunkhwa Levies Force Ordinance, 2019 (Khyber Pakhtunkhwa Ord. No. III of 2019), and the Federal Levies Force Regulation, 2012, shall be deemed valid and the same shall not be called in question in any Court of law.

**SCHEDULE**  
[see section-1(3)]

**Part-A**

| S.No. | District.         |
|-------|-------------------|
| 1.    | Bajaur.           |
| 2.    | Mohmand.          |
| 3.    | Khyber.           |
| 4.    | Orakzai.          |
| 5.    | Kurrum.           |
| 6.    | South-Waziristan. |
| 7.    | North-Waziristan. |

**Part-B**

| S.No. | Sub-Division.                           |
|-------|---|
| 1.    | HasanKhel in district Peshawar.         |
| 2.    | Darra Adam Khel in district Kohat.      |
| 3.    | Bettani in district Lakki Marwat.       |
| 4.    | Wazir in district Bannu.                |
| 5.    | Jandola in district Tank.               |
| 6.    | Darazinda in district Dera Ismail Khan. |

BY ORDER OF MR. SPEAKER  
PROVINCIAL ASSEMBLY OF KHYBER  
PAKHTUNKHWA.

(AMJAD ALI)  
Secretary  
Provincial Assembly of Khyber Pakhtunkhwa

**3-9**

**CHARGE SHEET:**

I, Farhan Khan (PSP), District Police Officer, North Waziristan, as competent authority, hereby charge you, FC Nawar No.440 for the purpose of departmental enquiry proceedings as follows:-

- That you have absented yourself intentionally from your official duties. It has been learnt through reliable sources that you have been gone abroad without permission.
- This all speaks at gross misconduct on your part and you are liable to be punished under Police Rules-1975.
- Such act on your part is against the service rules/discipline and amounts to misconduct and negligence.


By reason of the above you appear to be guilty of misconduct under the Police Rules 1975 (As amended vide Khyber Pakhtunkhwa Gazette Notification No.27<sup>th</sup> of August 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules, and under section 77 of the Khyber Pakhtunkhwa Act, 2017.

2. You are therefore directed to submit your defense/reply within 07 days of the receipt of this Charge Sheet to the enquiry officer.

3. Your written defense/reply, if any, should reach to the Enquiry Officer within the specified period, failing which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

4. You are directed to intimate whether you desire to be heard in person or otherwise?

5. A statement of allegation is enclosed.

  
(Farhan Khan) PSP  
District Police officer,  
North Waziristan

10

**SUMMARY OF ALLEGATIONS:**

I, Farhan Khan (PSP), District Police Officer, North Waziristan as competent authority, am of the opinion that FC Nawar No.440, has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of Police Rules As amended vide Khyber Pakhtunkhwa Gazette Notification, No 77 of August 2014 and have rendered yourself liable to all or any of the penalties specified in the said rules, and under section 77 of the Khyber Pakhtunkhwa Act, 2017.

**SUMMARY OF ALLEGATIONS:**

- That you have absented yourself intentionally from your official duties. It has been learnt through reliable sources that you have been gone abroad without permission.
- This all speaks at gross misconduct on your part and you are liable to be punished under Police Rules-1975.
- Such act on your part is against the service rules/discipline and amounts to misconduct and negligence.

1. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations M. Zaman SP NW is appointed as Enquiry Officer.
2. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc and findings within the targeted days after the receipt of this order.
3. The accused shall join the proceedings on the date, time and place fixed by the Enquiry Officer.

(Farhan Khan) PSP  
District Police officer,  
North Waziristan

No. 8082-83 SRC dated 27/06/2022  
Copies to:

1. The Enquiry Officer
2. The Accused Officer/Official.

C 11

OFFICE OF THE DISTRICT POLICE OFFICER, NORTH WAZIRISTAN.  
FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

(Under rules 5 (03) KPK Police Rules, 1975)

That you FC Nawar No.440 have rendered yourself liable to be proceeded under Rule 5(3) of the Khyber Pakhtunkhwa Police Rules, 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No.27<sup>th</sup> of August 2014) for the following misconduct:

- > That you have absented yourself intentionally from your official duties. It has been learnt through reliable sources that you have been gone abroad without permission.
- > This all speaks of gross misconduct on your part and liable to be punished under Police Rules-1975/ service rules & discipline.

That by reason of above, as sufficient material is placed before the undersigned; therefore it is decided to proceed against you in general police proceeding without aid of enquiry officer.

That the misconduct on your part is prejudicial to good order and discipline in Police Force.

That your further service in the Police Force will amount to encourage misconducts and this will be a halt in becoming a good Police officer.

That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the said rules.

You are, therefore called to show cause as why you did not strictly follow the orders in accordance with the Khyber Pakhtunkhwa Police Rules 1975.

Now you are intimated to submit reply to show cause notice within 07 days of the receipt of the notice, failing an ex parte action will be taken against you.

You are further directed to inform the undersigned of your will that wish to be heard in person.

On account of the above reasons you have rendered yourself liable to be proceeded against you under Khyber Pakhtunkhwa Police Rules 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification No.27<sup>th</sup> of August 2014), hence these ground will be sufficient to take an ex parte action.

(Farhan Iqbal) PSP  
District Police officer,  
North Waziristan

No.10531/SRC/Show cause dated the 08/09/2022

D 12

**ORDER**

This order of the undersigned will dispose of departmental proceedings against accused FC Nawar No.440 (Suspended) under Police Rules 1975 (as amended vide Khyber Pakhtunkhwa Gazette Notification, No.27<sup>th</sup> of August 2014) by issuing charge sheet and statement of allegation to him for committing the following commissions/complaints:


1. That you have absented yourself intentionally from your official duty. It has been learnt through reliable sources that you have been gone abroad without any permission.
2. This act speaks of gross misconduct on your part and liable to be punished under Police Rules 1975 Service Rules & Discipline.

Charge sheet and statement of allegation were issued and were served upon him.

SP Investigation North Waziristan was appointed as enquiry officer to scrutinize the conduct of the official. The enquiry officer submitted his finding report on 31.08.2022 in which he stated that the allegations leveled against the accused officer have been proved. Hence he has been found guilty and recommended for recovery of pay for the period in which he remained absent & also recommended for major punishment.

Keeping in view the position explained above. Therefore, I Mr. Farhan Khan (PSP) District Police Officer, North Waziristan, in exercise of the power vested in me, under Khyber Pakhtunkhwa Police Rules 1975 (amended in 2014) hereby awarded him major punishment of dismissal from service from the date of suspension.

OB No. 477  
Dated: 25 09/2022.

  
District Police Officer,  
North Waziristan

Copy to:

1. The Regional Police Officer, Bannu Region, Bannu for information, please.
2. PO SRC OASI Reader for necessary action.
3. LO RI In-charge Kot In-charge General Godown with the directions to deposit all the government items issued to him, if any.

E 13

بخدمت جناب ڈی۔ آئی۔ جی صاحب بنوں ریجن بنوں

جناب عالی!

مہودبانہ گزارش ہے کہ سائل بوجہ غیر حاضر عاسروس محکمہ پولیس کنسٹیبل سے برخاست ہو چکا ہے۔ سائل لائسنس کے وجہ سے غیر حاضر ہو کر برخاست ہو چکا ہے۔ سائل کا اور کوئی ذریعہ معاش نہیں ہے۔

لہذا بذریعہ درخواست استدعا کیجاتی ہے کہ مجھ اور ہمارے بال بچوں پر رحم کر کے نوکری پر بخالی کا حکم صادر فرمائی جاوے سائل عمر بھر دُعا گورہیگا۔

عین نوازش ہوگی

فقط مورخہ:-----

العارض ناورخان

سائل: کنسٹیبل ناورخان نمبر 440 تحصیل شیواہ شمالی وزیرستان

شناختی کارڈ نمبر: 5-21508-8404463

رابطہ نمبر: 0332-9837117



**F 14**  
**F-7-16/23**  
POLICE DEPARTMENT

BANNU REGION

ORDER

This order will dispose of the departmental appeals, preferred by the following Ex-FCs of District Police North Waziristan, wherein, they have prayed for setting aside the order of major punishment of "Dismissal from service" imposed upon them by DPO North Waziristan for committing the following omissions:


1. Ex-FC Wali Roshan No. 513
2. Ex-FC Nawar Khan No. 430
3. Ex-FC Naseer Ullah No. 509
4. Ex-FC Alampir No. 529
5. Ex-FC Saddam Hussain No. 776

➤ That the above mentioned ex-police officials intentionally absented themselves from their official duty and had gone abroad without seeking any JOC/permission of the competent authority, which shows their negligence, lack of interest and irresponsibility in performing of their official duty.

They were proceeded against departmentally by issuance proper charge-sheets based upon statement of allegation and SP Investigation NW was appointed an enquiry officer. The Enquiry Officer submitted his findings reporting that they have not attended the enquiry proceedings so far and their travel record was placed on file. Besides they were also final show cause notices received by their relatives. Hence they were recommended for major punishment and the aforementioned punishment of dismissal was imposed upon them.

Record received, comments perused and they were heard in person in orderly room dated 02.11.2023 and they declared before the undersigned that they all were abroad.

Therefore, I, Qasim Ali Khan, Regional Police Officer, Bannu Region Bannu, in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules, 1975 (with amendments 2014) hereby filed the above mentioned appeals, for the orders of dismissal, imposed/passsed by District Police North Waziristan are the ones, in consonance with law.

  
Regional Police Officer  
Bannu Region, Bannu

No. 3924/FC, dated Bannu the 02/11/2023

Copy to District Police officer, North Waziristan for information and necessary action, with reference to his Memo No. 6268/SRC dated 22.08.2023.

  
Regional Police Officer

F 14

Better copy

6

POLICE DEPARTMENT

BANNU REGION

ORDER

This order will dispose of the departmental appeals preferred by the following Ex-FCs of District Police North Waziristan wherein, they have preferred for setting aside the order of major punishment of "Dismissal from service" imposed upon by them by DPO North Waziristan for committing the following omissions.

1. Ex-FC Wali Roshan No. 513
2. Ex-FC Nawar Khan No. 440
3. Ex-FC Naseer Ullah No. 509
4. Ex-FC Alamgir No. 529
5. Ex-FC Saddam Hussain No. 776

That the above mentioned ex-police officials intentionally absented themselves from their official duty and had gone abroad without seeking any NOC / permission of the competent authority which shows their negligence, lack of interest and irresponsibility in performing of their official duty.

They were proceeded against departmentally by issuance proper charge sheets based upon statement of allegation and SP Investigation NW was appointed an enquiry officer. The Enquiry Officer submitted his findings reporting that they have not attended the enquiry proceedings so far and their travel record was placed on file. Besides they were also Final Show Cause Notices received by their relatives. Hence they were recommended for major punishment and the aforementioned punishment of dismissal was imposed upon them.

Record received, comments perused and they were heard in person in orderly room dated 02-11-2023 and they declared before the undersigned that they all were abroad.

Therefore, I, Qasim Ali Khan, Regional Police Officer, Bannu Region Bannu in exercise of the powers vested in me under Khyber Pakhtunkhwa Police Rules, 1975 (with amendment 2014) hereby filed the above mentioned appeals, for the orders of dismissal, imposed / passed by District Police North Waziristan are the ones, in consonance with law.

Regional Police Officer  
Bannu Region, Bannu

No. 3924/EC, dated Bannu the 08/11/2023

Copy to District Police Officer, North Waziristan for Information and necessary action with reference to his Memo No. 6268/SRC dated 22-08-2023

Regional Police Officer  
Bannu Region Bannu



بعد الت چاپ سروس ٹریڈ مارک کے لئے صورتوں کے لئے

منجانب اسٹاک

ناورخان نام

دعویٰ اپیل

باعتبار اسٹاک

مستند مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و عمل کاروائی متعلقہ ان مقام اپنا اور  
کیسٹ اسٹاک انڈسٹری کے لئے اسٹاک مندرجہ بالا کی کوریج کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب  
موصوف کو مقدمہ کی عمل کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے باہمی نامہ و آفیز ثالثہ و تیسرا برتلف  
دینے جواب دہی اور اقبال دعویٰ اور بصورت دیگر کرنے اجراء اور وصولی چیک و ڈپو اور رضی دعویٰ اور درخواست  
پر تمام کی تقدیر اور اس پر مقرر کر لینے کا اختیار ہوگا نیز بصورت عدم پیروی یا دیگر کیسٹ یا اپیل کی برابری  
اور بصورت دیگر اپنے دائرہ کرنے اپیل نگران و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ پر  
کے عمل یا اجزی کی کاروائی کے واسطے اور وکیل یا نگران قانونی کو اپنے ہمراہ یا اپنی بجائے تفریکہ اختیار ہوگا  
اور اس پر مقدمہ کر بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا سامنے پروا نہ منطوق  
قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجا نہ التوا مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب  
موصوف ہوں گے نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام روزہ  
پر ہو یا بدست باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا رکالت نامہ لکھ دیا کہ مستند ہے۔

الرقوم 4/12/23

التسکد

التسکد

التسکد

11  
اریاب سینگ انکمال  
ایڈووکیٹ

3  
سید الشہید جمال فرید  
ایڈووکیٹ

ناورخان

محمد نواز  
ایڈووکیٹ