

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
AT CAMP COURT, D.I.KHAN.

Service Appeal No. 580/2019

Date of Institution ... 03.05.2019
Date of Decision ... 26.10.2021

Muhammad Imran S/O Muhammad Jan, Ex-Constable No. 8025/FRP, Office of S.P/F.R.P/ D.I.Khan. Presently, Village Kata-Khel, Panyalla, Tehsil Paharpur, District D.I.Khan.

... (Appellant)

VERSUS

The Provincial Police Officer (IGP), Khyber Pakhtunkhwa, Central Police Office, Peshawar and two others.

... (Respondents)

Muhammad Ismail Alizai,
Advocate

... For appellant.

Muhammad Rasheed,
Deputy District Attorney

... For respondents.

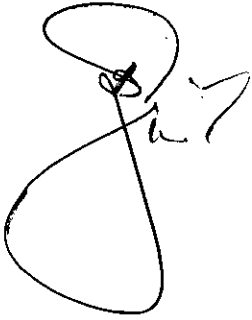
Rozina Rehman
Atiq Ur Rehman Wazir

... Member (J)

... Member (E)

JUDGMENT

Rozina Rehman, Member(J): Facts gleaned out from the memorandum of appeal are that appellant was enlisted as Constable in the Police Department. He was subjected to departmental proceedings on the allegations of being absent from duty and a show cause notice was issued. The proceedings culminated in award of punishment of removal from service. He moved an appeal duly supported by medical record but the same could not find favor with the appellate authority and was dismissed, hence, the present service appeal.



2. We have heard Muhammad Ismail Alizai Advocate learned counsel for appellant and Muhammad Rasheed learned Deputy District Attorney for the respondents and have gone through the record and the proceedings of the case in minute particulars.

3. Muhammad Ismail Alizai Advocate learned counsel appearing on behalf of appellant, in support of appeal contended with vehemence that impugned orders are discriminatory, illegal and arbitrary in nature. He submitted that the appellant is innocent who was subjected to the penalty which is harsh in nature. Learned counsel further contended that the appellant was vexed twice in clear defiance of law and the principles laid down by the superior courts. He submitted that while adjudicating the departmental proceedings and the departmental appeal, the entire matter was disposed in a slip shod manner and the respondents failed to decide the same in accordance with the principles of natural justice and thus awarded impugned punishment which is patently unwarranted and illegal.

4. Conversely, learned D.D.A submitted that the appellant remained willfully absent from his lawful duty on different occasions for a long period, therefore, he was awarded different punishments. He submitted that the appellant was absent from lawful duty w.e.f 08.07.2018 till the date of his removal from service without any leave or permission of the competent authority, therefore, he was proceeded against departmentally and was issued show cause notice but he refused to receive the said notice and that after fulfillment of all codal formalities, he was awarded major punishment of removal from service by the competent authority.



5. From the record, it is evident that appellant was proceeded against departmentally on the allegations of absence from lawful duty w.e.f 08.07.2018 till the date of his removal from service i.e. 20.12.2018. From the impugned order, of Superintendent of Police F.R.P, D.I.Khan Range, D.I.Khan dated 20.12.2018, it is evident that his absence was reported vide daily dairy report No.18 dated 08.07.2018. Another report No.7 of daily dairy dated 27.11.2018 is also available on file which clearly shows the absence of appellant vide daily dairy No.18 as mentioned above besides his ailment and attendance in the Police Station. He made a request for marking his attendance vide the above mentioned report and the same report of daily dairy is not denied by the respondents. Once, the appellant marked his attendance, then it is astonishing as to why he was proceeded against departmentally for this period when he was very much present for his duty. His medical record was also not taken into consideration.

6. Record reveals that appellant was not been treated in accordance with law as record is silent as to whether any charge sheet/statement of allegations was served upon the appellant. Similarly, no inquiry report is available on record to ascertain as to what were recommendations of the Inquiry Officer upon which the appellant was removed from service. Record is silent as to whether any opportunity of defense was afforded to the appellant. Most importantly we have also observed that the appellant was proceeded against on the ground of absence for the mentioned period, however the authority has treated the mentioned period as leave without pay, as such the very ground, on the basis of which the appellant was proceeded against, has vanished away. Wisdom in this respect is



derived from the judgment of the august Supreme Court of Pakistan, reported in 2006 S.C.M.R 434 and 2012 TD (Services).348.

7. In view of the foregoing, instant appeal is accepted and the appellant is reinstated in service, however the intervening period is treated as leave without pay. Parties are left to bear their own costs.

File be consigned to the record room.

ANNOUNCED.

26.10.2021



(Atiq Ur Rehman Wazir)
Member (E)
Camp Court, D.I.Khan



(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

Order
26.10.2021

Appellant present through counsel.

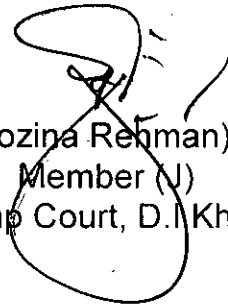
Muhammad Rasheed learned Deputy District Attorney alongwith Muhammad Zubair H.C for respondents present. Arguments heard. Record perused.

Vide our judgment of today of this Tribunal placed on file, instant appeal is accepted and the appellant is reinstated in service, however the intervening period is treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

Announced.
26.10.2021



(Atiq ur Rehman Wazir)
Member (E)
Camp Court, D.I.Khan



(Rozina Rehman)
Member (N)
Camp Court, D.I.Khan

Due to COVID-19 therefore to
come up for the same on 28/9/21

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28.09.2021

Appellant alongwith his counsel present: Mr. Muhammad Zubair, Head Constable alongwith Mr. Usman Ghani, District Attorney for the respondents present and sought adjournment for arguments. Adjourned. To come up for arguments before the D.B on 26.10.2021 at Camp Court D.I. Khan.



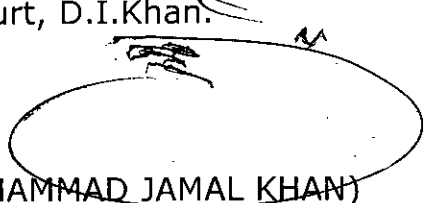
(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)
CAMP COURT D.I.KHAN



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT D.I.KHAN

29.10.2020

Appellant is present in person. Mr. Muhammad Jan, Deputy District Attorney and Mr. Muhammad Zubair, Litigation Constable, for the respondents are also present. Time sought for submission of written reply/comments, time given. File to come up for written reply/comments on 23.12.2020 before S.B at Camp Court, D.I.Khan.


(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT D.I.KHAN

23.12.2020

Due to Covid-19, case is adjourned to 23.02.2021 for the same as before.



Riaz Khan.

23.02.2021

Appellant in person present.

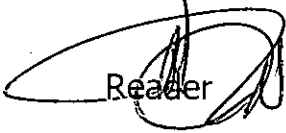
Riaz Khan Paidakhel learned Assistant AG alongwith Muhammad Zubair H.C for respondents present.

Reply/comments on behalf of respondents submitted which is placed on file. To come up for rejoinder if any, and arguments on 25.05.2021 before D.B at Camp Court, D.I Khan.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, D.I Khan

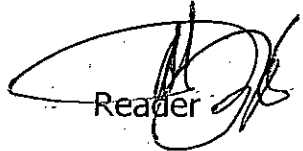
25/3/2020

Due to COVID-19 the case is adjourned. To come up for the same 23/4/2020 at Camp Court, D.I Khan


Reader

23/4/2020

Due to COVID-19 the case is adjourned. To come up for the same 25/9/2020 at Camp Court, D.I Khan



Reader

25.09.2020

Appellant in person present.

Mr. Muhammad Jan, Deputy District Attorney for respondents present.

Reply on behalf of respondents was not submitted. Notice be issued to respondents for submission of reply/comments for 29.10.2020 before S.B at Camp Court, D.I.Khan.



(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

24.02.2020

Counsel for the appellant Muhammad Imran present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Police Department. He was imposed major penalty of removal from service vide order dated 20.12.2018 on the allegation of absence from duty. The appellant filed departmental appeal on 14.01.2019 which was rejected vide order dated 04.04.2019 hence, the present service appeal. Learned counsel for the appellant further contended that neither charge sheet, statement of allegation was served upon the appellant nor proper inquiry was conducted nor the appellant was associated in inquiry proceeding nor any show-cause notice was issued to the appellant, therefore, the appellant was condemned unheard.


The contentions raised by learned counsel for the appellant need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 25.03.2020 before S.B at Camp Court D.I.Khan.

Appellant Deposited
Security & Process Fee
02/3/20


(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan


25.11.2019

Appellant in person present and requested for adjournment on the ground that his counsel is not available today due general of Khyber Pakhtunkhwa Bar Council. Case to come up for preliminary hearing on 27.01.2020 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

27.01.2020

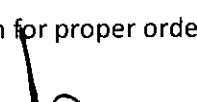
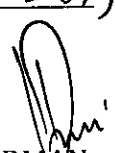

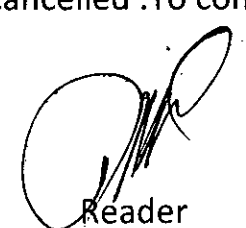
Appellant in person present and requested for adjournment on the ground that his counsel is not available today due to strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 24.02.2020 for preliminary hearing before S.B at Camp Court D.I.Khan.


(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 580/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/05/2019	<p>The appeal of Mr. Muhammad Imrān presented today by Mr. Muhammad Ismail Alizai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 3/5/19</p>
2-	8-8-2019	<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>28-8-2019</u></p> <p style="text-align: right;"> CHAIRMAN</p>
28.08.2019		<p>Appellant in person present and requested for adjournment. Adjourned to 22.10.2019 for preliminary hearing before S.B at Camp Court D.I.Khan.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court D.I.Khan</p>
22/10/2019		<p>Since tour to D.I.Khan has been cancelled .To come for the same on 25/11/2019.</p> <p style="text-align: right;"> Reader</p>

BEFORE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 580 /2019.

Muhammad Imran, Ex-PC No.8025/FRP.

Appellant.

Versus

Provl: Police Officer, Khyber Pakhtunkhwa, and others.

Respondents.

Service Appeal

I N D E X

<u>S.No.</u>	<u>Description of Documents</u>	<u>Annexure</u>	<u>Page(s)</u>
1.	Petition with Grounds of Appeal & affidavit.	--	02 — 04
2.	Application for condonation of delay.	—	05 — 06
3.	Copy of Order of SP/FRP.	* A	— 07
4.	Copy of Deptl: Appeal.	B & C	08 — 18
5.	Vakalat-Nama	--	— 19

Dated: 03.05.2019.

M. Imran
(Muhammad Imran) Appellant
Through Counsel
Muhammad Ismail Alizai
(Muhammad Ismail Alizai)
Advocate High Court, DIKhan.

BEFORE SERVICE TRIBUNAL, KHY:PAKHTUNKHWA,PESHAWAR.Service Appeal No:.....580...../2019.**Khyber Pakhtunkhwa
Service Tribunal**Diary No. 697Dated 3-5-2019

Muhammad Imran s/o Muhammad jan,
Ex-Police Constable No.8025/FRP,
Office of SP / FRP / D.I.Khan.
Presently, Village Kata-khel, Panyalla,
Tehsil Paharpur, District D.I.Khan.

(Appellant)

Versus

1. The Provincial Police Officer (IGP), Khyber Pakhtunkhwa,
Central Police Office, Peshawar.
2. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
3. SP, FRP, D.I.Khan.

(Respondents)

Note: The addresses given above are sufficient for the purpose of service.

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SERVICE APPEAL AGAINST (1) ORDER DTD 20.12.2018 WHEREBY THE APPELLANT IS AWARDED PUNISHMENT BY RESPDT: NO. 3 OF REMOVAL FROM SERVICE & (2) FINAL ORDER DTD.04.04.2019 OF RESPONDENT NO.2 WHEREBY DEPARTMENTAL APPEAL WAS REJECTED BY RESPONDENT NO.2.

Respectfully Sheweth: -

The appellant very humbly submits as under: -

- Filed to-day**
Registrar
3/5/19
- BRIEF FACTS:**
1. That during the year 2007 the petitioner was inducted in Police Department as Constable and posted at FRP, D.I.Khan District.
 2. That the petitioner had since his induction in Police Department been serving under Respondent No.3 while Respondent No.2 is the appellate authority and Respondent No.1 commands overall authority in respect of the parties, thus all are necessary party to the lis.
 3. That the appellant always striven hard to discharge and fulfill the duties and tasks assigned with due diligence and dedication. Service record of the appellant is otherwise unblemished, clean and devoid of any adverse marking since nothing of the sort had ever been conveyed to the appellant in this respect.
 4. That during the year 2018, the appellant was subjected to departmental proceedings on allegation of being absent from duty w.e.f. 08.07.2018 and a Show Cause Notice was allegedly issued to the stated effect. The proceedings culminated in award of title mentioned punishment though the appellant having been denied due process had little to attend proceedings and defend himself. Copy of order pertaining award of punishment is placed herewith at **Annex; A.**

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5. That as a matter of fact the appellant had fallen severely ill due to unbearable back and though the appellant sought leave of absence from the local authority but was blatantly refused any relief rather the authorities were not ready to even receive an application to the stated effect. As such forcing the appellant to leave the station to medical attendance for his ailment and thereby remained under constant medical aid bed ridden throughout.
6. That in consequence thereof the appellant, having been condemned unheard and subjected to departmental action on the allegation of being absent from duties, though never conveyed to the appellant, the proceedings culminated in award of punishment to the appellant of the kind Removal from Service vide order dated 20.12.2018, as conjointly impugned hereby.
7. That on gaining knowledge of the award of punishment and aggrieved from the order of the departmental authority the appellant moved an appeal with respondent No.2 duly supported by medical records and thus seeking reinstatement in service which however, could not find favour with appellate authority and was dismissed / rejected vide order dated 04.04.2019 vide No.3224-25/EC. Copies of Departmental Appeal & Order passed thereon are placed as **Annex; B & C**, respectively. It is however, worth mentioning that the order on award of punishment i.e. Annex-A was never conveyed / communicated within time to the appellant and a copy thereof could only be obtained through personal source where after departmental appeal was preferred without delay on 28.01.2019 thus the departmental appeal was well within time frame of limitation yet knocked out by the appellate authority on technical ground. Hence, the instant appeal on the grounds, inter-alia, as under,

Grounds:

1. That the order passed by departmental authority i.e Respdt: No.3, as impugned hereby, is discriminatory, arbitrary in nature, legally and factually incorrect, ultra-vires, void ab-initio against the rights of the appellant and militates against the principles of natural justice thus is liable to be set-aside and nullified.
2. That the appellant is innocent and has been subjected to the penalty most harsh in nature for no fault on his part. Respondent No.3 failed to regulate the departmental inquiry in accordance with the law & procedures prescribed for the purpose and as such erred at the very outset of the proceedings thus causing grave miscarriage of justice as well as prejudice to the appellant in making his defense.
3. That it is a matter of record that the appellant has been vexed, not once but twice and that too, in clear defiance of the law and principles laid by the superior courts as well as the Tribunals as could be gathered from the facts and circumstances of the case.
4. That the respondents while adjudicating in the matter of departmental proceedings and the departmental appeal disposed off the entire matter in a slipshod manner through the orders impugned hereby and even failed to decide it in accordance with the principals of natural justice, thus the award of impugned punishment is patently unwarranted, illegal, ultra-vires, nullity in law and apparently motivated for extraneous reasons and thus is neither sustainable nor maintainable in law.
5. That the appellant has sufficient length of service rendered for the department. While adjudicating in the matter the departmental authorities utterly ignored not only the provisions of law on the point but the rights, too, of the appellant including fringe benefits and by imposing the penalty in defiance of law as aforesaid, deprived the entire family of the appellant of its only source of making the two ends meet.

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6. That the order passed by respondent No.3 on holding of departmental proceedings including the order on award of punishment as well as the rejection of the departmental appeal, as impugned hereby, have infringed the rights and have caused grave miscarriage of justice to the appellant without any lawful excuse.
7. That while ignoring the rights of the appellant guaranteed by the constitution, the departmental authorities / respondents utterly failed to adopt a proper course & follow due procedure hence erred in disposal of the matter in accordance with the law and rules. The impugned order passed by Respondent No.3 and rejection of departmental appeal by Respondent No.2 on mere technicality thus lack in legal sanction and therefore, both orders are liable to be set aside in the interest of justice.
8. That the petition of appeal / appellant is duly supported by law and rules formulated thereunder, besides the affirmation / affidavit annexed hereto.
9. That this Hon'ble Tribunal is competent and has ample powers to adjudge the matter under reference/appeal.
10. That the counsel for the appellant may very graciously be allowed to add to the grounds during the course of arguments, if need be.

Prayer:

In view of the fore mentioned submissions, it is very humbly requested that the impugned order dated 20.12.2018 passed by SP/FRP, D.I.Khan, besides the order dated 04.04.2019 of Respondent No.2 may, on being declared as illegal, arbitrary, discriminatory, void ab-initio, ineffective and inoperable against the appellant, be very graciously set aside and the appellant may in consequence thereof be very kindly reinstated in service with allowance of all back benefits. Grant of any other relief including costs, as may be deemed appropriate by the Hon'ble Tribunal is solicited, too.

Dated: 13.05.2019

Humble Appellant,

M. Imran
(Muhammad Imran) Appellant,

Through Counsel.

Muhammad Ismail Alizai
(Muhammad Ismail Alizai)
Advocate High Court.

AFFIDAVIT:

Dated: 07.05.2019.

I, Muhammad Imran, the appellant, hereby solemnly affirm and declare on oath that contents of the petition are true and correct to the best of my knowledge, belief and per the official records. Also, that nothing is willfully kept or concealed from this Hon'ble Tribunal.



M. Imran
Deponent.

BEFORE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

CMA No.

In: Service Appeal No. _____/2017.

Muhammad Imran, Ex-PC No.8025-FRP.

Appellant.

Versus

Provl: Police Officer, Khyber Pakhtunkhwa, and others.

Respondents.

Service Appeal

Application Seeking Condonation of Delay.

Respectfully Stated:-

1. That the petitioner has moved a service appeal before this Hon'ble Tribunal impugning the order of his dismissal and final order thereon, contents whereof may kindly be read in conjuncture with the instant application.
2. That it was due to circumstances beyond control of the petitioner / appellant, primarily because of the acts & omissions on part of respondents, that the petition of Departmental Appeal could not be filed earlier for which the petitioner / appellant cannot be held responsible.
3. That the petitioner / appellant has a good, prima-facie case to his credit and is in genuine expectation of its success on merit.
4. That the Apex Court of the country has time and again pronounced that a lis cannot be dismissed on technical grounds, including delay if the relief sought is justified in law and on facts.
5. That this Hon'ble Tribunal has ample powers to condone delay, if any, for the advancement of and in larger interest of justice.

Prayer:-

It is therefore, humbly requested that the application under review may kindly be accepted and delay, if any in filing of the appeal may kindly be condoned in the interest of justice.

Humble Petitioner,

Dated.

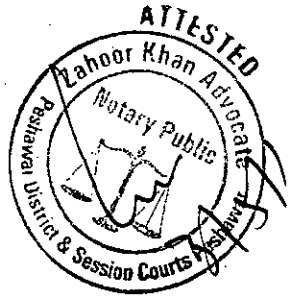
M. Imran
(Muhammad Imran)
Ex-PC No.8025/FRP, D.I.Khan.

Tough
M. Imran
Attc

AFFIDAVIT:

I, Muhammad Imran, the appellant, hereby solemnly affirm and declare on oath that contents of the petition are true and correct to the best of my knowledge, belief and per the official records. Also, that nothing is willfully kept or concealed from this Hon'ble Tribunal.

Dated: 03.05.2019.



M. Imran
Deponent.

My this order will dispose off departmental enquiry conducted against Constable Muhammad Imran No.8025/FRP under Khyber Pakhtunkhwa Police Disciplinary Rules-1975 (Amended in 2014).

According to daily diary report No.18 dated 08.07.2018 of Police Station. Gui Imam Tank, he remained absent from law full duties with effect from 08.07.2018 to till date without any leave or permission from the competent authority. Show Cause Notice was prepared and sent to his home address for delivered upon him through Constable Muhammad Zubair No.9149/FRP vide daily diary report No.05 dated 23.09.2018 of FRP Police Lines DIKhan but he refused to received said Show Cause Notice. To this effect he was issued charge sheet along with summary of allegation. Muhammad Ismail Khan DSP/FRP DIKhan Range was nominated as enquiry officer to unearth the actual facts. The enquiry officer summoned time and again to join the enquiry proceeding and record his statement but he did not attend the enquiry proceeding. After completion of all codal formalities the enquiry officer submitted his findings report along with other relevant papers wherein the defaulter constable was found guilty of the charges leveled against him and recommended him for Final Show Cause Notice. Final Show Cause Notice was served upon him on 29.11.2018. He was required to submit the reply of said Final show cause notice within stipulated period of 15 days but he failed to do so. He was called in orderly room in the office on undersigned on various dates but he does not appear before the undersigned. On 19.12.2018 he was appeared before the undersigned but he does not convince the undersigned about his innocence. From perusal of his service record it revealed that he was enlisted as Constable on 27.07.2007, during his service he remained absent from law full duties for (552) days, awarded minor punishment of confinement to quarter guard for 05 days, fine Rs.3000/- and stoppage of 02 annual increments without cumulative effect previously.

Keeping in view the facts stated above, I MR. AMAN ULLAH KHAN, Superintendent of Police FRP D.I.Khan Range, D.I.Khan, in exercise of powers vested in me under Khyber Pakhtunkhwa Police Disciplinary Rules-1975 amended-2014 hereby award Constable Muhammad Imran No.8025/FRP major punishment of Removal from service from the date of his absence. His absence period i.e 08.07.2018 to till date is treated as without pay.

ORDER ANNOUNCED.

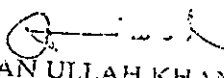
Dated _____/2018.

OB No. 843/FRP

Dated 20/12/2018

Copy to:-

1. Pay Officer
2. SRC
3. OHC


(AMAN ULLAH KHAN)
Superintendent of Police,
FRP, DIKhan Range DIKhan.

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کفریہ کتابت میں FRI² لکھنا (KRIC)

اس کے بعد بحالی شدت از تاریخ وقت

DISMISSIL - مہنگی ٹیڈر سہائی ہندوستان

کتابت کا نام ہے - کابل خرمیاں صفحہ FRI² میں لکھا ہے

2007ء سے لکھنا کھلی ہوئی فلائس میں خوشامیابی

سے سرانجام دینا ضروری تھا۔ کہ ایک بار مورد کی موزی میں

کے ساتھ ہو کر بنا لیا۔ اور تھانہ میں عام فلاح ٹانگہ لکھنا

کے دوران میں عدوج سالہ موزی طور پر عدوج سالہ میں لکھا

کتابت کا نام اور کتابت کا نام ہے موزی میں لکھا

اور مہنگی ٹیڈر کے نام سے لکھنے کی اجازت

دیکھی ہوئی - اور ساتھ ہی موزی میں لکھا - کتب پر لکھا

کتابت میں لکھا - جو مہنگی ٹیڈر کے نام سے لکھا

میں لکھی ہوئی ہے اور لکھنا میں لکھا ہے۔ تاکہ

بیاری کا علم ہو گا کسی صورت میں یہی فرحادی سے

گنیز فرما جائے اور دکان ہمال بیاری کے لیے

اولیٰ درج اور تاج درج 07 سے 08 درج فرما جائے

بہ نسبت بیاری شاید کچھ زیادہ ہو لگا - اور جانب ڈال کر

کے ہی کچھ بیاری کے ساتھ مشورہ کیا تاکہ ریل

کی پٹی کے بیروں میں جانے کے باعث طرف میں

اصافہ نہ ہو - اور تاجی ریل نہ ہو کی صورت

میں بیاری میں اصافہ ہو کر آپریشن کی صورت میں

درج نہ ہو کر

بہ نسبت بیاری کے جانب اور ہمال سے شاید حرج

بیاری کے ریل دکان ہمال کرنے کے فرحادی

درج کی - جو کہ دراصل فرحادی نہ تھی -

بیاری تھی اور تاجی اور تاجی تھی

یہ درج نہ ہو گا

4 - یہ مندرجہ ذیل کے پاداش سے ضروری تھا۔

یہ مختلف پائلز Proceeding شروع کیے - اور

نہ ان کی طرح شہادتیں اور یہی ہے ڈیپارٹمنٹل

کامپلٹڈ - اور یہی Departmental Proceeding

شروع کیے گئے ان کے ذریعے سے

ذاتی ممبروں کے بارے میں ان کے بارے میں

FRP-DIC

کے لئے کیے گئے۔ ان کے بارے میں جاری کیا۔

جس میں ان کی رپورٹ کے بارے میں اور 11-27

درجہ کے خلاف بھی کی جا رہی ہے

5 - ان کے بارے میں بھی لے کر بھی تھی۔

تجزیاتی بیان ان کے بارے میں ان کے

کے بارے میں۔ ان کے بارے میں اور

جو ان کے بارے میں کے لئے

جو ان کے بارے میں تھا اور ان کے بارے میں

یہی ہے FRP-DIC کے بارے میں

Personal hearing - لکھنؤ میں

انہی کے پاس رہا - FRP-DIK

6 - انہی کے پاس رہا - FRP-DIK

فروری میں فروری میں

انہی کے پاس رہا - FRP-DIK

انہی کے پاس رہا

7 - تاریخ 20/12/18

انہی کے پاس رہا

انہی کے پاس رہا

انہی کے پاس رہا

انہی کے پاس رہا

انہی کے پاس رہا

انہی کے پاس رہا

انہی کے پاس رہا

فرضی عمل انگریزی کو پروان اچھا لکھے جو انٹرنیٹ

سے تحریر کرنا ہے۔ حوالہ از ریڈیو قانونی سیکشن میرانہ

مدیر بحالہ میرا قانونی حق تھا۔ کسی جانب کوئی توجہ نہ رہی

گئی۔ اور انصاف کے جملہ تقاضے پامال ہو کر چلے

قانونی سہولت گمراہی 13 سال کا کوئی کوئی لحاظ نہ رکھا

گیا۔ اور یہی ہے میرا حالت اور ادا خانہ کی عذر دہی

خبری کرمانہ رکھا جا کر قدرتی انصاف کا ٹائٹل مانگا

یہ کہ۔ میری دوسری بھی مدد فرمائی جا کر سنا جا۔ اور میری

کسی جملہ سیکشن انصاف کی فونڈ نہ ہو سکتی تھی سہولت فرمائی جا

اور انٹرنیٹ سیکشن پر جا کر لکھی گئی تھی شامل انگریزی

کی جا کر انصاف ڈائری کو Departmental Enquiry

کا حق لکھو فرمائی جا۔ اور انہی دوسری پر حسب طرف عنوان عمل

فرمائی جا۔ جس کی سہولت ہوگی۔ تاریخ 28 خوری 2019

انگریزی - 8025 سہولت فرمائی جا۔ FRIP سے سہولت فرمائی جا

فرمائی جا۔ سہولت فرمائی جا۔ جس کی سہولت فرمائی جا

تقریر کا نام

تقریر روزنامہ

18 - عمر صاحب (کتابت) 87/18 وقت 20:15 بجے، 8 جون 2025 کو

یہ تقریر 7/18 سے 8/18 تک کی ہے۔

اس تقریر میں آپ کی تقریر پر جواب دیا گیا ہے۔

روزنامہ کے لیے یہ تقریر ضروری ہے۔

بلا گرفت میں ارسال ہو۔

7 جولائی 2025، تقریر کا نام (27/18) وقت 10:20 بجے، 27 جون 2025

تقریر 27/18 سے 28/18 تک کی ہے۔

اس تقریر میں آپ کی تقریر پر جواب دیا گیا ہے۔

روزنامہ کے لیے یہ تقریر ضروری ہے۔

بلا گرفت میں ارسال ہو۔

Miccio
تقریر کا نام

14-01-2019
Police Station
Gulshan 2, Lahore

DISTRICT HEAD QUARTER HOSPITAL TANK

14

OPD SLIP



Name: Muhammad Imran
 Father's / Husband's Name: _____
 Age: _____ Sex: M
 Monthly OPD No: E = 860
 Provisional Diagnosis: _____

قیمت پرسی
 روپے 10/-

Date Clinical Finding / Treatment / Test

8/7/2018

M. Ghah
 (15/11/18)

8/7 Forwarded to
 MSU & lab

8/7 returned to
 MSU - 10

Cap Exam 10/11/18
 MSU 3.

20/11/18 Rapid
 MSU 2

20/11/18 MSU 2

AD. Absolutly best
 to avoid prolas welling
 & swelling for atleast 4 weeks

DISTRICT HEAD QUARTER HOSPITAL TANK

15

OPD SLIP



Name: Muhammed Moan

Father's / Husband's Name: _____

Age: _____ Sex: M

Monthly OPD No: 2577

قیمت پرپی
10/- روپے

Provisional Diagnosis: _____

Date	Clinical Finding / Treatment / Test
<p>8/8/2018 New Ref Saadex</p>	<p>→ 200 weekly - - 3/7 Medial (C23) * 117 - 3/7 Vortex in stat × BD 3/7 Metatarsal 117 - 1 3/7 Soft D. - 6 (C23)</p>
	<p>Ca/K renal 100mg 117 117 11. Absolutely rest To avoid walking, bedding & bulky in at least 100g words affect for 20 days (C23)</p>

DISTRICT HEAD QUARTER HOSPITAL TANK

OPD SLIP

Name: _____

Father's / Husband's Name: _____

Age: _____ Sex: ♂

Monthly OPD No: 2260

Provisional Diagnosis: _____



قیمت پریمی
10/-

Date

Clinical Finding / Treatment / Test

18/10/18

At Scars

Dr. Saif D. - 10

19/10/18

Dr. Muttu Abdul 10

Chirped - 10

Dr. Muttu 10

Dr. Muttu 10

Dr. Saif 75

at least one more x all 20 and
Polar Study, & Walcott

District Head Quarter Hospital Tank

DISTRICT HEAD QUARTER HOSPITAL TANK

17

OPD SLIP

Name: علی علی

Father's / Husband's Name: _____

Age: _____ Sex: ♂

Monthly OPD No: 6918

Provisional Diagnosis: _____



قیمت پرچی
10/-

Date

Clinical Finding / Treatment / Test

13-¹¹/₁₈

Wanker

7) Gonorrhoeal discharge,

7) Gonorrhoeal

7) Gonorrhoeal

7) Gonorrhoeal

7) Gonorrhoeal 20

7) Gonorrhoeal 20

7) Gonorrhoeal 20

Ad. Absolutely rest
 & to avoid further
 spread of infection
 least two weeks

Office
 D.H.Q. Hospital
 Dist. Tank

18

C

ORDER

This order will dispose of the departmental appeal preferred by ex-constable Muhammad Imran No. 8025 of FRP DI Khan Range, against the order of SF FRP DI Khan Range, DI Khan issued vide OB No. 843, dated 20.12.2018, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that according to daily diary report No. 18, dated 08.07.2018 of Police Station Gul Imam Tank, he remained absent from lawful duties with effect from 08.07.2018 till the date of removal from service i.e 20.12.2018 for total period of 05 months 12 days, without any leave or prior permission of the competent authority.

In this regard he was served with Show Cause Notice and sent to his home address for delivered upon him through special messenger vide daily diary report No. 05, dated 23.09.2018, of FRP Police Line DI Khan, but he refused to receive the said Show Cause Notice.

He was issued Charge Sheet alongwith Statement of Allegations, and Muhammad Ismail Khan DSP FRP DI Khan Range was nominated as Enquiry Officer to unearth the actual facts. He was summoned time and again by the Enquiry Officer to join the enquiry proceedings and to record his statement, but he did not attend the enquiry proceedings. After completion of codal formalities the Enquiry Officer submitted his findings alongwith other relevant papers, wherein Ex-defaulter constable was found guilty of the charges leveled against him and recommended that to issue him a Final Show Cause Notice.

Upon the findings of Enquiry Officer he was issued Final Show Cause Notice on 29.11.2018. He was required to submit the reply of Said Final Show Cause Notice within stipulated period of 15 days, but he failed to do so. He was called in orderly room on various dates. On 19.12.2018 he was appeared before the competent authority, but he did not convince the competent authority, therefore, he was awarded major punishment of removal from service vide OB No. 843, dated 20.12.2018.

Feeling aggrieved against the impugned order of SP FRP DI Khan Range, DI Khan the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 03.04.2019.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. The service record of the appellant was also perused and found that he is a habitual absentee as during his past service he was remained absent from duty on different occasion for a long period of 552 days without prior permission of his seniors.

Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force. Therefore any leniency or complacency would further embolden the accused officer and impinge upon the adversely on the over all discipline and conduct of the force. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, I, **Sajid Ali PSP** Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being badly time barred and meritless.

Order Announced.


Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

No. 3334-25 /EC, dated Peshawar the 04/04/2019.


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

1. SP FRP DI Khan Range, DI Khan. His service record alongwith D-file sent herewith.
2. Ex-constable Muhammad Imran No. 8025 of FRP DI Khan Range, DI Khan.

VAKALATNAMA

N.W.F.P. BAR COUNCIL

MUHAMMAD ISMAIL ALIZAI
 Advocate High Court
 N.I.C. 12101-0050025-3
 S.No 1228



Issuing Authority

Father's Name: MUHAMMAD IBRAHIM KHAN ALIZAI
 Address: ALIZAI HOUSE KIKI ALIZAI, D.I.KHAN
 Office Tel: 0346400133, 0333988770
 Enrolment Pt. L.C. 1984(R 31-03-2001)
 Enrolment Pt. H.C. 25-03-2003
 Place of Practice DCRA ISMAIL KHAN
 Date of Birth: 12-04-1988
 Blood Group: B+ve

3rd Floor G-Block, Khyber Road Peshawar. Ph: 091-0211172
 Email: muhammadismailalizi@yahoo.com, nwfbarcouncil@gmail.com

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

In Service Appeal No. / 2019 titled Muhammad Imran VS PPO/Kp etc

I, Muhammad Imran, Appellant, hereby appoint, M/s. Muhammad Ismail Alizai, Ahmad Shahbaz Alizai, Advocates High Court, D.I.Khan, in the above mentioned matter / case and authorize him/them to do all or any of the following acts, in my/our name and on my/our behalf, that is to say,

1. To appear, act and plead for me/us in the above mentioned case in this Court/ tribunal in which the same may be tried or heard or any other proceedings what so ever, ancillary thereto, including appeal, revision etc; on payment of fees separately for each court by me / us,
2. To sign, verify, file, present or withdraw all/any proceedings, petitions, appeals, cross objections and application for compromise or withdrawal, or for submission to arbitration of the said case or any other documents, as may be deemed necessary or advisable by him/them and to conduct prosecution or defense of the said case at all its stages,
3. To undertake execution proceedings, deposit, draw and receive money, cheques, cash and grant receipts thereof and to do all other acts and things which may be conferred to be done for the progress and in the course of prosecution of the said case,
4. To appoint and instruct any other Advocate/ legal practitioner authorizing him to exercise the power and authority conferred upon the advocate whenever he/they may think fit to do so and to sign Power of Attorney on our behalf,

I /we, the undersigned do hereby agree to ratify and confirm all acts done by the advocate or his authorized substitute in the matter as my /our own acts, as if done by me/us to intents and purposes, and I / we undertake that I /we or my/our duly authorized agent shall appear in the court on all hearings and will inform the advocate(s) for appearance when case is called and I/we the undersigned agree hereby not to hold the advocate(s) or his/their substitute responsible if the said case be proceeded ex-parte or dismissed in default in consequence of my/our absence from court when it is called for hearing and for the result of the said case, the adjournment costs whenever ordered by the court shall be of the advocate(s) which he/they may receive and retain himself/themselves. I/we the undersigned do hereby agree that in the event of the whole or part of the fees agreed by me/us to be paid to the advocate(s), if remain unpaid, he/they shall be entitled to withdraw from prosecution of the above said case until the same is paid and fee settled is only for the above said case and above court and I /we agree hereby that once fee is paid, I/we shall not be entitled for refund of the same in any case whatsoever.

IN WITNESS WHEREOF, I /we do hereby set my/our hand to these presents, the contents of which have been read / read over, explained fully and understood by me/us on

This 3rd Day of May 2019

Thumb Impression / Signature(s) of Executant(s)

Accepted By:

Muhammad Ismail Alizai
Advocate High Court.

Ahmad Shahbaz Alizai/AHC

M. Imran

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.580/2019.

Muhammad Imran No.8025, Ex-Constable FRP,DI Khan Range.....Appellant

VERSUS

- 1. The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.**
- 2. Commandant FRP,
Khyber Pakhtunkhwa, Peshawar.**
- 3. Superintendent of Police FRP,
DI Khan Range,..... Respondents.**

Subject:- Para-wise reply on behalf of Respondents.

Respectfully Sheweth:

PRELIMINARY OBJECTIONS

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has no cause of action to file the instant appeal.
4. That the appellant has not come to this Honorable Court with clean hands.
5. That the appellant is estopped due to his own conduct to file the instant Service Appeal.
6. That the appellant trying to concealed material facts from this Honorable Tribunal.

FACTS

1. Para No.01 is pertains to the appellant record needs no comments.
2. Para No.02 is not related.
3. Incorrect and denied. From perusal of the service record of the appellant it revealed that during service, he remained willfully absent from his lawful duty on different occasions for a long period of (552) days, to which he was awarded different punishments i.e confinement to quarter guard for 05 days, with fine Rs. 3000/- and stoppage of 02 annual increments without cumulative effect.
4. Incorrect and denied. That according to daily dairy report No. 18, dated 08.07.2018 of Police Station Gul Imam Tank, the appellant was remained absent from lawful duties with effect from 08.07.2018 till the date of his removal from service i.e 20.12.2018 for total period of 05 months 12 days, without any leave or prior permission of the competent authority. In this regard he was proceeded against proper departmentally as he was issued Show Cause Notice and sent to his home address for delivered upon him through special messenger vide daily diary report No. 05, dated 23.09.2018, of FRP Police Line Di Khan, but he refused to receive the said Show Cause Notice. However, after fulfillment of all codal

formalities required as per law the appellant was awarded major punishment of removal from service by the competent authority.

5. Incorrect and denied. The plea taken by the appellant in the para regarding to the submission of application for leave is a propounded story as the appellant failed to submit any application or medical certificate before his seniors. However, the appellant was required to have taken this plea before the enquiry officer or before the competent authority, during the course of enquiry.
6. Incorrect and denied. Upon the findings of Enquiry Officer the appellant was issued Final Show Cause Notice on 29.11.2018, but he failed to submit his reply within stipulated period. However, he was called in orderly room time and again and lastly on 19.12.2018, he was appeared before the competent authority, but he failed to present any justification regarding to his innocence therefore, he was correctly awarded major punishment of removal from service vide OB No. 843, dated 20.12.2018. The copy of above order has already conveyed to him and on the basis of which he filed departmental appeal.
7. Incorrect and denied. Departmental appeal submitted by the appellant was thorough examined and rejected on sound grounds. In regard the submission of medical certificates the appellant was supposed to submit the said certificates before the enquiry officer or before the competent authority during the course of enquiry. Moreover, the impugned order has already been conveyed to the appellant well in time.

GROUND:-

1. Incorrect and denied. The order of the respondent No. 3 is based on facts, legally justified and in accordance with law/rules.
2. Incorrect and denied. The appellant remained willfully absent from lawful duty for a long period, without any leave or prior permission of the competent authority. On the allegations of willful absence the appellant was dealt with proper inquiry by the competent authority as he was issued Charge Sheet alongwith Summary of allegations and enquiry officer was nominated. After completion of all codal formalities the enquiry officer submitted the findings, wherein the appellant was found guilty of the charges leveled against him. Upon the findings of enquiry officer the appellant was served with final Show cause Notice but he failed to submit his reply. An impel opportunity being heard in person for defence in the light of natural justice was also provided to the appellant, which he availed too, but he failed to convince the competent authority regarding to his innocence. (Copies


of Charge Sheet enquiry report and final Show Cause Notice are attached herewith as annexure "A", "B" & "C")


3. Incorrect and denied. the allegations are false and baseless. That it is material of facts that the appellant was remained absent from his lawful duty for a long period of 05 months 12 days, without any leave or prior permission of the competent authority. Proper departmental enquiry was initiated against him under the relevant rules and the allegations were fully established against the appellant by the enquiry officer during the course of enquiry. After fulfillment of all codal formalities, he was awarded appropriate major punishment of removal from service, which is legally justified and in accordance with law/rules.
4. Incorrect and denied. On the allegations of absence, the appellant was issued Show Cause Notice on his home address, but he refused from receiving of the said Notice. Thereafter, he was issued Charge Sheet with Summary of Allegations and served upon him, but he failed to submit his reply despite the facts that he was summoned by the enquiry officer time and again. Moreover, he was also heard in person by the competent authority, in the light of natural justice, but he failed to present any justification regarding his innocence. After fulfillment of all codal formalities, required under the law, he was awarded major punishment of removal from service which is commensurate with the gravity of his misconduct. Thus the departmental appeal was also thoroughly examined and rejected on sound grounds by the appellate authority as there was no any infirmity found in the order passed by the competent authority; therefore, no grounds exist to interfere in same.
5. Incorrect and denied, as the sufficient length service is not a cogent reason to prove innocence of the appellant in the eye of law. Moreover, the appellant was dealt with proper departmental enquiry, wherein he was found guilty of the charges leveled against him. All the codal formalities have been fulfilled during course of departmental proceedings as per the relevant law by the respondents. Thus, the appellant has been found to be an irresponsible person and habitual absentee in performance of official duties, hence he is responsible for the livelihood of his family.
6. Incorrect and denied. The order of the respondent No. 3 is based on facts, legally justified and in accordance with law/rules as the same was passed after fulfillment of all legal formalities required as per law.
7. Incorrect and denied. On the allegations of willful absence the appellant was dealt with proper departmentally under the special law i.e Police Rules 1975 amended


- in 2014 and during departmental proceedings the allegations were fully establishment against him by the enquiry officer. Therefore, his removal order and soon afterward the rejection order of the appellant issued by the respondents are legally justified and accordance to law.
8. Incorrect and denied. That the appellant has no cause of action to file the instant appeal as the same has not supported by any law/rules.
 9. Para No. 9 is admitted to the extent that this Honorable Tribunal has impelled power to adjudge the matter on merit under the instant reply.
 10. The respondents may also be permitted to produce record/additional grounds at the time of arguments.

PRAYERS:-

It is therefore, most humbly prayed that in the light of aforesaid facts/submission the service appeal being badly time barred may kindly be dismissed with cost please.


Superintendent of Police FRP,
DI Khan Range DI Khan
(Respondent No. 04)


Commandant FRP,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 03)


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No.01)

DISCIPLINARY ACTION

I, Aman Ullah Khan, SP FRP DIKhan as competent authority, am of the opinion that you Constable Muhammad Imran No.8025/FRP of FRP DIKhan Range of FRP have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.

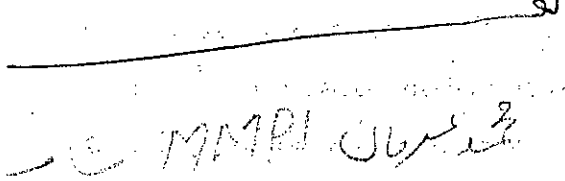
STATEMENT OF ALLEGATION

1. According to daily diary report No.18 dated 08.07.2018 of Police Station Gul Imam Tank, you remained absent from law full duties with effect from 08.07.2018 to till date without any leave or permission from the competent authority. Show Cause Notice was prepared and sent to your home address for delivered upon you through Constable Muhammad Zubair No.9149/FRP vide daily diary report No.05 dated 23.09.2018 of FRP Police Lines DIKhan but you refused to received said Show Cause Notice. It is a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules 1975 and has rendered yourself liable to be proceeded against departmentally.
2. For the purpose of scrutinize the conduct of said Constable with reference to the above allegation, Muhammad Ismail Khan DSP/FRP DIKhan is appointed as Enquiry Officer.
3. The Enquiry Officer shall conduct proceeding in accordance with provision of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record it is finding and make with twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official.
4. The delinquent official shall join the proceeding on the date, time and place fixed by the officer.



(Aman Ullah Khan)
Superintendent of Police, FRP
DIKhan Range, DIKhan

28/9/18



No 1871 /FRP

dated: 28-09 /2018

CHARGE SHEET

- I. I, Aman Ullah Khan, SP FRP DIKhan as competent authority, am of the opinion that you Constable Muhammad Imran No.8025/FRP of FRP DIKhan Range have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.
- II. According to daily diary report No.18 dated 08.07.2018 of Police Station Gul Imam Tank, you remained absent from law full duties with effect from 08.07.2018 to till date without any leave or permission from the competent authority. Show Cause Notice was prepared and sent to your home address for delivered upon you through Constable Muhammad Zubair No.9149/FRP vide daily diary report No.05 dated 23.09.2018 of FRP Police Lines DIKhan but you refused to received said Show Cause Notice. It is a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules 1975 and has rendered yourself liable to be proceeded against departmentally.
- III. By reason of the above, you seem to be guilty as sufficient materials is placed before the undersigned; therefore it is decided to proceed against you in general police proceeding.
- IV. You are; therefore, required to submit your written reply within 07 days of the receipt of this charges sheet to the Enquiry Officer.
- V. Your written reply, if any, should reach the Enquiry Officer within specific period, failing which it shall be presumed that you have no defense to offer and in that case ex-parte action shall follow against you.
- VI. Intimate as to whether you desire to be heard in person or not?
- VII. A statement of allegation is enclosed.


(Aman Ullah Khan)

Superintendent of Police, FRP
DIKhan Range DIKha

28/9/18

از دفتر DSP

جانیالی

FRP-Dils

حوالہ نمبر چارج ٹیکٹ نمبر FRP-1871 جاری کیا۔ ایس بی صاحب FRP/Dils
28-9-18

مختلف کمپنیاں کے نمبروں پر FRP جاری کیا۔ ایس بی صاحب FRP/Dils
جمعہ انٹرویو آفیسر فخر کا۔ وظائف انٹرویو سے یہاں گیا کہ
کمپنیاں نوکریہ 08-07-18 سے پولیس اسٹیشن تک تمام ٹائٹ سے
بغیر کئی ایڈز کے غیر ملکی ہیں۔

اندریں سلسلہ میں کمپنیاں نوکریہ کو نوکریہ وصول کرنے کے لئے
چارج ٹیکٹ نوکریہ کو نوکریہ نمبر 9388510-0344 والا دیا گیا مگر نوکریہ
کال Attend نہیں آتا تھا۔ نوکریہ چارج ٹیکٹ نوکریہ لاہور کمپنیاں نمبر 815
مختلف پولیس اسٹیشن FRP کے ان تمام سلسلہ کے گھومنے پر کئی نیا
نہوایا گیا۔ مگر ان سلسلہ والا گھومنے میں موجود نہ تھا۔

اندریں بہت نوکریہ کمپنیاں کے نمبر پر سبج ہی send کیا گیا ہے
کہ؟۔ ایسے خلاف چارج ٹیکٹ وصول کرے۔ مگر نوکریہ نہ تو
وصول کالی Attend کرتا ہے اور نہ ہی سبج ماواں دیتا ہے
نہیہ معلوم کرنے پر نوکریہ ماواں سرفال اللہ جوہر ٹریڈنگ Mmp
میں ہے۔ اسکا وہاں نمبر 983466-0345 حاصل کیا گیا
اسکو بھی کئی بار اطلاع مانی گئی ہے کہ وہ آئے؟۔ آج اسٹیشن
اور اپنے ہائی کے خلاف چارج ٹیکٹ وصول کرنے میں
تخلیوں سے کام لیتا ہے۔ اسٹیشن چارج ٹیکٹ وصول کرنے
کے لئے نہیں آتا ہے۔ کمپنیاں نوکریہ کو قبل ازیں بوجہ
غیر ملکی ان کمپنیاں ٹائٹ بیکال کیا گیا ہے۔ نوکریہ والا
بغیر خوف 08-7-18 سے ٹائٹ سے بدستور غیر ملکی ہے۔
NEP:2

جسے مذکورہ کی عمر صبر صبری کا مطابق ہو چکا ہے۔ مذکورہ کی صابری ماگولی
دوسرا نہیں ہے۔

03129388510

قرآن 29/10 کو مذکورہ کسٹبل سے صبری ندرات خود مددگار قریباً 20
یہ بات ہوئی کہ مذکورہ کو علاج صحت دینے والی کینیڈا طلب کیا گیا۔ مگر
مذکورہ نے کہا کہ میں ہی صبح صبر آؤں گا۔ میں صبر ہی
مذکورہ صبر نہیں آیا ہے۔

نفساً مذکورہ کے خلاف مکلف محمدانہ ماروالی کینیڈا فائل شو مار
الشو کرنے کی سفارش کی جاتی ہے۔

Dr. Anam
3
D.S.P. F.P. D.I.K.
31-10-2018

سزید حکیم ان بلا افضل ہوگا

FINAL SHOW CAUSE NOTICE.

WHEREAS YOU, Constable Muhammad Imran No.8025/FRP found guilty of following misconduct in violation of Khyber Pakhtunkhwa Police Disciplinary Rules 1975 with amendment 2014.

According to daily diary report No.18 dated 08.07.2018 of Police Station Gul Imam Tank, you remained absent from law full duties with effect from 08.07.2018 to till date without any leave or permission from the competent authority. Show Cause Notice was prepared and sent to your home address for delivered upon you through Constable Muhammad Zubair No.9149/FRP vide daily diary report No.05 dated 23.09.2018 of FRP Police Lines DIKhan but you refused to received said Show Cause Notice.

After completion the enquiry the Enquiry Officer submitted his finding in which the charges leveled against you were proved without any shadow of doubt.

As a result thereof, I AMAN ULLAH KHAN, Superintendent of Police, FRP, D.I.Khan Range D.I.Khan as competent authority have tentatively decided to impose upon you the penalty of Major/ Minor punishment Under Section 3 of the said ordinance.

1. You are, therefore, required to Show Cause as to why the aforesaid penalty should not be imposed upon you.
2. If no reply to this notice is received within 15-days of its delivery in the normal course of circumstances, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

M. Imran

29/11/18

12103-6808242-9

0344-9388510

منذورة کینسل نے گل اماں گھانہ میں

خود وصول کیا ہے -

A. Ullah
Superintendent of Police,
FRP D.I.Khan Range D.I.Khan.

27/11