


# FORM OF ORDER SHEET

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

**Appeal No.** 717/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/05/2024	<p>The appeal of Mr. Moeen Ali presented today by Mr. Fazal Shah Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar 31.05.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

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

Service Appeal No 717 /2024

Moeen Ali .....Appellant

**V E R S U S**

PPO. & others .....Respondents

**I N D E X**

S.No	Description of Documents	Annexure	Pages
1.	Service appeal with affidavit		1-4
2.	Copy of regularization order dated 01-03-2020	A	5-6
3.	Copy of transfer order dated 14-11-2021	B	7
4.	Copy of order dated 06-12-2023	C	8
6.	Copy of removal order dated 05-01-2024.	D	9-10
7.	Copy departmental Appeal	E	11
8.	Vakalat Nama		12

Dated:-27-05-2024

*Moeen Ali*  
Appellant

Through

*Fazal Shah Mohmand*  
Fazal Shah Mohmand  
Advocate,  
Supreme Court of Pakistan

**OFFICE:-** Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841  
**Email:-** fazalshahmohmand@gmail.com

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

Service Appeal No 717/2024

Moeen Ali, Ex Constable No 1529, Capital City Police Peshawar.  
.....Appellant

**V E R S U S**

1. Superintendent of Police Head Quarters Capital City Police Peshawar.
2. Capital City Police Officer Khyber Pakhtunkhwa Peshawar.  
.....Respondents

**APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 05-01-2024 WHEREBY, THE APPELLANT HAS BEEN REMOVED FROM SERVICE AND AGAINST WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED SO FAR DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS.**

**PRAYER:-**

On acceptance of this appeal the impugned Order dated 05-01-2024 may kindly be set aside and the appellant may kindly be ordered to be reinstated in service with all back benefits.

**Respectfully Submitted:-**

1. That the appellant was enlisted as Special Police Officer (SPO) in the year 2019 and later on regularized w.e.f 01.03.2020 along with others and since enlistment the appellant performed his duties with honesty and full devotion and to the entire satisfaction of his high ups. **(Copy of regularization order dated 01-03-2020 is enclosed as Annexure A).**
2. That the appellant was transferred to District Khyber on 14-11-2021, where he regularly performed his duties. **(Copy of transfer order dated 14-11-2022 is enclosed as Annexure B).**
3. That in the month of October 2023 fact finding inquiry was initiating and the appellant along with others were brought to police lines at about 10:00 PM on leave days i.e. Saturday and Sunday where he was forced to sign a blank paper and was also directed to deposit his service book, service card, cheque

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book and ATM card etc., which are still not returned to the appellant despite repeated requests.

4. That the salary of the appellant was subsequently stopped, after the mentioned preliminary inquiry on the allegations of ghost/illegal/fake employees vide order dated 06-12-2023 **(Copy of order dated 06-12-2023 is enclosed as Annexure C)**
5. That the appellant was duly enlisted as SPO and later on regularized and he performed his duties honestly and also received salaries from respondent department.
6. That in the meanwhile the appellant was removed from service vide order 05-01-2024.. **(Copy of removal order dated 05-01-2024 is enclosed as annexure D )**
7. That the appellant visited the office of respondent No. 2 on 02.02.2024 to submit departmental appeal, however the same was not entertained where after the appellant sent his departmental appeal through registered courier (TCS) on 02.02.2024 which has not been responded so far. **(Copy departmental Appeal is enclosed as Annexure E).**
8. That the impugned Order dated 05-01-2024 to the extent of appellant is against the law, facts and principles of natural justice on grounds inter alia as follows:-

**GROUND S:-**

- A. That the impugned order dated 05-01-2024 is illegal, unlawful and void ab-initio.
- B. That mandatory provisions of law and rules have been badly violated by the respondents and the appellant has not been treated according to law and rules.
- C. That no charge sheet and show cause notice was issued to the appellant.
- D. That no regular inquiry was conducted in the matter to have found out the true facts and circumstances.
- E. That no evidence was collected in support of the allegations thus the charges never stood established against the appellant.

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- F. That the appellant was not heard in person and ex parte action has been issued against him in violation of the principles of natural justice.
- G. That there is no omission and commission on part of the appellant and the appellant could not be punished for the fault of others if any, strangely the alleged master mind have been transferred only and no action has been taken against them, hence the impugned order smacks malice. .
- H. That the appellant has about 5 years of service with unblemished service record.
- I. That the appellant seeks the permission of this honorable tribunal for further/additional grounds at the time of arguments.

**It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.**

**Any other relief deemed appropriate and not specifically asked for, may also be granted in favor of the appellant.**

**Dated:-27-05-2024**

*Muhammad Ali*  
**Appellant**

**Through**

*Fazal Shah Mohmand*  
**Fazal Shah Mohmand**  
**Advocate,**  
**Supreme Court of Pakistan**

**&**  
*Baseer Ahmad Shah*  
**Baseer Ahmad Shah**

**&**  
*Ibad Ur Rehman Khalil*  
**Ibad Ur Rehman Khalil**  
**Advocates Peshawar**

④

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

Service Appeal No \_\_\_\_\_/2024

Moeen Ali .....Appellant

**V E R S U S**

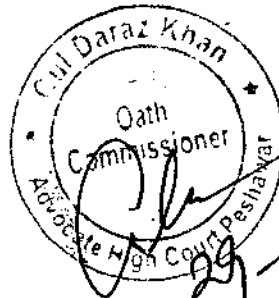
PPO. & others .....Respondents

**AFFIDAVIT**

I, Moeen Ali, Ex Constable No 1529, Capital City Police Peshawar., do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

*Moeen Ali*

**DEPONENT**



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Sl No	Name & SPO Bell No.	Father Name	Allotted No.
1	MUHAMMAD AMJAD	MUHAMMAD AMJAD	
2	MUHAMMAD ISMAIL	YOUSAF	
3	MUHAMMAD HILAL	MUHAMMAD YOUNAS	
4	IRFAN	KHALID GUL	
5	MOEN ALI	ABDUL MANAN	
6	GAZI SOHAIL	IMAM DIN	
7	MUHAMMAD TAHIR	SARZAMIN	
8	HANZA	MUSA KHAN	
9	JAHAL UD DIN	SHER DIL	
10	HANID ALI	AHMAD ALI	
11	SHAMZAD ALI	MURAD ALI	
12	MUHAMMAD IFTIKHAR	SHAKIR ULLAH	
13	SIFAT ULLAH	AMIN ULLAH	
14	MUHAMMAD IJAZ	TARIQ KHAN	
15	SALMAN BHEZAD	SHAHAD GUL	
16	YOUNAS KHAN	GUL KHAN	
17	MUHAMMAD SALMAN	GUL KHAN	
18	USMANI	SALIM	
19	USMAN KHAN	JAVID KHAN	
20	JALAL UD DIN	SHERDIL KHAN	
21	MUHAMMAD UBRAID	LAIQAT ALI SHAH	
22	SAID AMIRI	MUHAMMAD AMIN	
23	GHRAZ MEHMUD	TAJ MEHMUD	
24	UMAR FAROOD	ZAHOR AHMAD	
25	KHALID	SALIM	
26	LIJAJID	MUSTAQIM SIAH	
27	RAHIM GUL	ABDUL GANI	
28	WASIM SHOUKAT	SHOUKAT HUSSAIN	
29	AMIR HUSSAIN	RAHMAN HUSSAIN	
30	HAZRAT GUL	HABIB GUL	

Sl No: SJ/Judger/HD/15-29/2016 Vol-II: In pursuance of the provisions of the provisions of the Provincial Police Act No. XXVII of 2019 and on the recommendation of Provincial Police Officer Khyber Pakhtunkhwa and approval of the Provincial cabinet, the Home and Tribal Affairs Department is pleased to notify herewith regulation of the following Special Police Officers (SPOs) working in C/P Peshawar under DMS Code PR4093-Peshawar City Police as Constables (BPS-07) with effect from 01.03.2020. Therefore, in the light of above notification the following Special Police Officers are hereby advised as Regular Constable (BPS-07) in Capital City Police, Peshawar. They are allotted Constabulary numbers noted against their names.

OFFICE OF THE CAPITAL CITY POLICE OFFICER, PESHAWAR.



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**OFFICE OF THE CAPITAL CITY POLICE OFFICER,  
PESHAWAR**

**ORDER**

No. SO/Budget/HD/15-29/2016 Vol-II: In pursuance of the provisions contained in section 3 read with Section 5 of the Khyber Pakhtunkhwa Special Police Officer (Regularization of Service) Act, 2019 (Khyber Pakhtunkhwa Act No. XXVII of 2019) and on the recommendation of Provincial Police Officer Khyber Pakhtunkhwa and approval of the Provincial cabinet, the Home and Tribal Affairs Department is pleased to notify herewith regularization of the following Special Police Officers (SPOs) working in CCP Peshawar under DDO Code PR4093-Peshawar City Police as Constables (BPS-07) with effect from 01.03.2020.

Therefore, in the light of above notification the following Special Police Officers are hereby absorbed as Regular Constable (BPS-07) in Capital City Police, Peshawar. They are allotted Constabulary numbers noted against their names.

S.No	Name & SPO Belt No.	Father Name	Allotted No.
1.	UMAR AMJAD	MUHAMMAD AMJAD	
2.	MUHAMMAD ISMAIL	YOUSAF	
3.	MUHAMMAD HILAL	MUHAMMAD YOUNAS	
4.	IRFAN	KHALID GUL	
5.	MOEEN ALI	ABDUL MANAN	
6.	QAZI SOHAIL	IMAM DIN	
7.	MUHAMMAD TAHIR	SARZAMIN	
8.	HAMZA	MUSA KHAN	
9.	JAMAL UD DIN	SHER DIL	
10.	HAMID ALI	AHMAD ALI	
11.	SHAHZAD ALI	MURAD ALI	
12.	MUHAMMAD IFTIKHAR	SHAKIR ULLAH	
13.	SIFAT ULLAH	AMIN ULLAH	
14.	MUHAMMAD IJAZ	TARIQ KHAN	
15.	SALMAN SHEHZAD	SHAHDAD GUL	
16.	YOUSAF KHAN	GUL KHAN	
17.	MUHAMMAD SALMAN	GUL KHAN	
18.	USMAN	SALIM	
19.	USMAN KHAN	JAVID KHAN	
20.	JALAL UD DIN	SHERDIL KHAN	
21.	MUHAMMAD UBaid	LAIQAT ALI SHAH	
22.	SAID AMIN	MUHAMMAD AMIN	
23.	QARAZ MEHMOOD	TAJ MEHMOOD	
24.	UMAR FAROOQ	ZAHOR AHMAD	
25.	BILAL	SALIM	
26.	JUNAID	MUSTAQIM SHAH	
27.	RAHIM GUL	ABDUL GANI	
28.	WASIM SHOUKAT	SHOUKAT HUSSAIN	
29.	AMIR HUSSAIN	RAHMAN HUSSAIN	
30.	HAZRAT GUL	HABIB GUL	





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Copy to all concerned

OSI dated Peshawar the

2020

OSI  
20641  
9706-12129

FOR CAPITAL CITY POLICE OFFICER  
PESHAWAR

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ALAM ZEB  
GAZI ALAUDDIN  
IQBAL AHMAD  
SAHHAZAD GUL  
LIAQAT ALI  
ZAKIA  
KHAN SHAH

Allotted &

Name & SPO Roll No.  
FARHAN ALI  
ZAFAR YAR  
ZAFAR  
ANAN SHAH ZAD  
GAZI AHMAD  
GAZI AHMAD  
GAZI AHMAD

... officers noted against their names  
... in Capital City Police Peshawar. They are  
... the following Special Police Officers are  
... (HPS-07) with effect from 13.03.2020.  
... in effect from 13.03.2020.  
... to notify herewith  
... and approval of the  
... (Registration  
... in



OFFICER OF THE CAPITAL CITY POLICE OFFICER  
PESHAWAR



OFFICE OF THE CAPITAL CITY POLICE OFFICER,  
PESHAWAR**ORDER**

No. SO/Budget/HD/15-29/2016 Vol-II: In pursuance of the provisions contained in section 3 read with Section 5 of the Khyber Pakhtunkhwa Special Police Officer (Regularization of Service) Act, 2019 (Khyber Pakhtunkhwa Act No. XXVII of 2019) and on the recommendation of Provincial Police Officer Khyber Pakhtunkhwa and approval of the Provincial cabinet, the Home and Tribal Affairs Department is pleased to notify herewith regularization of the following Special Police Officers (SPOs) working in CCP Peshawar under DDO Code PR4093-Peshawar City Police as Constables (BPS-07) with effect from 01.03.2020.

Therefore, in the light of above notification the following Special Police Officers are hereby absorbed as Regular Constable (BPS-07) in Capital City Police, Peshawar. They are allotted Constabulary numbers noted against their names.

S.No	Name & SPO Belt No.	Father Name	Allotted No.
1.	FARHAD ALI	KHAN SHAH	
2.	ALAM DIYAR	ZAKIR	
3.	IQBAL	LIAQAT ALI	
4.	MUHAMMAD ADNAN SHEHZAD	SHEHZAD GUL	
5.	IBNE AMIN	IQBAL AHMAD	
6.	QAZI IRFAN	QAZI ALAUDDIN	
7.	ALI ZEB	ALAM ZEB	

Sd/-  
SP HQRS:  
FOR CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

OBNO.2064  
Dated 27-06-2019

No. \_\_\_\_\_/OSI, dated Peshawar the / /2020.

Copy to all concerned.



*[Handwritten signature]*

Capital Police Officer  
Capital Police Officer  
Capital Police Officer  
Capital Police Officer

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

dated Peshawar the 14-11-2021

No 3089-92/OSI

*[Handwritten signature]*  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

- 1. Muhammad Ahmad Raza No. 509.
- 2. Noman Ali No. 1529.
- 3. Hameed No. 1434.

The following listed authorities of Capital City Police Peshawar are hereby transferred to the above mentioned officers from their respective offices.

ORDER

OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR



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OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR

ORDER

The following lower subordinates of Capital City Police Peshawar are hereby  
Transfer to District Police Officer Khyber on loan basis with immediate effect.

1. Hamza No.1414
2. Moin Ali No.1529
3. Muhammad Ahmad Raza No.569

Sd/-  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

No.3089-92/OSIO

dated Peshawar the 14-11-2021

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

1. District Police Officer Khyber
2. PO CCP Peshawar
3. FM CCP Peshawar
4. CRC CCP Peshawar.

*[Handwritten Signature]*

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OFFICE OF THE  
DISTRICT POLICE OFFICER  
KHYBER

No. BR 14 /PA-DPO Khyber



**ORDER**

With reference to Office Letter No. 20219/PA-SP-C dated 15/11/2023, in pursuance of the directions, the pay of the following is hereby stopped with immediate effect till further orders.

Sr.	Name/No.	Personnel No.
01	Uniar Farooq s/o Zahoor Ahmad No. 4636	997181
02	Hazrat Gul s/o Habib Gul No. 397	00522449
03	Ibrar Akhtar s/o Javed Akhtar No. 319	532147
04	Saud Ali s/o Mustaqem Shah No. 4248	37673
05	Inam	699858
06	Muhammed Younas s/o Gul Khan No. 6208	377450
07	Salman Shehzad s/o Shehzad Gul No. 7168	00589967
08	Muhammed Inshikhar s/o Shakir Ullah No. 6221	700148
09	Faizan No. 354	0098163
10	Moeen Ali s/o Abdul Manan No. 1529	985652
11	Shaukat Iqbal s/o Mir Khalam No. 1593	921365
12	Muhammed Ejaz s/o Tariq Khan No. 7466	553304
13	Muhammed Ubaid s/o Liaqat Ali No. 6472	395704
14	Farhad s/o Khlon Shah No. 945	322369
15	Hamza s/o Musa Khan No. 1414	985649
16	Muhammed Tahir s/o Sher Zamin No. 6631	361979
17	Usman s/o Saleem No. 6048	544038
18	Faraz Mehmood s/o Tej Muhammad No. 6567	997180

DISTRICT POLICE OFFICER  
KHYBER

OP No. 1159 Dated 16/11/2023  
No. BR 15-29/PA-DPO Khyber

Copies to:

1. The Capital City Police Officer, Peshawar
2. DSP HQ, Khyber
3. Superintendent Khyber
4. Superintendent Peshawar



SUPERINTENDENT OF POLICE  
HEADQUARTERS CCP PESHAWAR  
Phone No. 091-9210737

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ORDER

1. In compliance with the direction of DIG/HQrs. Khyber Pakhtunkhwa issued vide letter No. 101 PA/DIG/HQrs. dated 21.08.2023 and W/CCPO vide Fmdst. No. 4542-51 dated 2.11.2023 Moeen Ali Belt No. 1529, Personnel No. 985652 (Khyber) was found to be ghost illegal employee. He was proceeded against on account of receiving illegal salaries through bank account despite the fact that he did not found in the official record.

2. Accordingly, Enquiry Committee headed by the SSP Coordination was constituted to enquire into the allegations. The Enquiry Committee, after going through the pros and cons of the issue, held that illegal employee Moeen Ali was fictitiously recruited by master minds of the then Account Branch i.e. Budget Officer Aslam, Senior Clerk Haji Shahid Ali and Pay Officer Ulair Shah who were siphoning out salary from national exchequer on his name. The masterminds of this scam adopted various ways like illegally employing a moneymake of previous dismissed police employee, illegal fake ghost employees recruited through fake orders, OB entries and fake transfer orders and thereafter starting their salaries in connivance of AG officer etc.

In the instant case one Moeen Ali cousin of Muhammad Hukhr, stated that both of them were recruited by Haji Shahid and he paid Rs. 500,000/- each for their respective recruitments. Muhammad Hukhr handed over the money in presence of Moeen Ali at Haji Shahid's residence. After a week, Shahid Haji provided Moeen Ali with an order, he made his arrival without undergoing necessary procedures like physical checkup, medical examination or training. He received his salaries through Allied Bank Dalazak Road branch (0861). His bank statement was obtained. He opened account No. 5010085800780010 on 20-10-2021.

The Service Roll of Moeen Ali (1529) was scrutinized, which revealed that the Notification as per Order Book No. 2054, dated 21-01-2019, is fake, with scanned signatures. The OB clerk report on this Order book indicates an ex-Pakistan leave entry for FC Rehman Ullah (1778) and FC Adnan (2886). Additionally, the ASI report on Belt No. 1529 in CCP Peshawar states that FC Muhammad Mohsin Khan is serving at gate No. 2 as a guard and the allotted belt number is fake.

3. After having been gone through all the available material on record including findings/recommendations of the Enquiry Committee, the undersigned is fully convinced that no process whatsoever was followed for his recruitment clearly violating the principle of open competition and transparency as envisaged for general recruitment in Police and the only purpose was to draw salary on his name from the national exchequer by the delinquent officials of Pay Branch and their associates.

**ORDER**

1. In compliance with the direction of DIG/HQrs: Khyber Pakhtunkhwa issued vide letter No. 101/PA/DIG/HQrs: dated 21.08.2023 and W/CCPO vide endst: No. 4242-51 dated 02.11.2023 Moeen Ali Belt No. 1529, Personnel No. 985652 (Khyber) was found to be ghost/illegal employee. He was proceeded against on account of receiving illegal salaries through bank account despite the fact that he did not found in the official record: -
2. Accordingly, Enquiry Committee headed by the SSP Coordination was constituted to enquire into the allegations. The Enquiry Committee, after going through the pros and cons of the issue, held that illegal employee Moeen Ali was fictitiously recruited by master minds of the then Account Branch i.e, Budget Officer Aslam, Senior Clerk Haji Shahid Ali and Pay Officer Tahir Shah who were siphoning out salary from national exchequer on his name. The masterminds of this scam adopted tactics, like illegally employing a namesake of previous dismissed police employee illegal/fake/ghost employees recruited through fake orders/OB entries and fake transfer orders and thereafter starting their salaries in connivance of AG office etc.
3. In the instant case one Moeen Ali cousin of Muhammad Ifkhar, stated that both of them were recruited by Haji Shahid and they paid Rs. 500,000/- each for their respective recruitments. Muhammad Ifkhar handed over the money in presence of Moeen Ali at Haji Shahid's residence. After a week, Shahid Haji provided Moeen Ali with an order, he made his arrival without undergoing necessary procedures like physical checkup, medical examination or training. He received his salaries through Allied Bank Dalazak Road branch (0846). His bank statement was obtained. He opened account No. 0010085860780010 on 20-10-2021.
4. The Service Roll of Moeen Ali (1529) was scrutinized, which revealed that the Notification as per Order Book No.2064, dated 27-01-2019, is fake, with scanned signatures. The OB clerk report on this Order book indicates an Ex-Pakistan leave entry for FC Rehman Ullah (1778) and FC Adnan (2886). Additionally, the OASI report on Belt No.1529 in CCP Peshawar states that FC Muhammad Mohsin Khan is serving at gate No.2 as a sentry and the allotted belt number is fake.
5. After having been gone through all the available material on record including findings/recommendations of the Enquiry Committee, the undersigned is fully convinced that no process whatsoever was followed for his recruitment clearly violating the principle of open competition and transparency as envisaged for general recruitment in police and the only purpose was to draw salary on his name from the national exchequer by the delinquent officials of Pay Branch and their associates.



*[Handwritten signature]*

THE SECRETARY OF THE INTERIOR  
WASHINGTON, D. C. 20540

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6. In this connection, it has also been observed in the judgment of the Apex Court of Pakistan vide Civil Petition No.4057 of 2021 & C.M. Appeal No. I of 2022 wherein such illegal employments in a Government Department were declared illegal in which no pre-requisite criteria was being followed, Para-3 of the judgment ibid is reproduced for ready reference as under;

*3. "Having heard learned counsel for the parties and going through the impugned judgment and on the basis of the comments filed by the Government of Khyber Pakhtunkhwa, it appears that at the time of appointing the petitioner no process was followed and the principle of transparency and open competition was entirely ignored. The petitioner was appointed in violation of the law and the rules and even if the termination letter does not mention so, it is clear and obvious from the record that this was indeed the case. Further no vested right to claim continuation of service has been pleaded or shown".*

7. Hence, in exercise of the powers mentioned in Section 4(1)(b)(iii) of Khyber Pakhtunkhwa Police Rules, 1975 (amended 2014), Moeen Ali Personnel Number 985652 ghost/illegal employee is hereby removed from Police record. He is also liable to be proceeded against under sections 110 & 115 of the Khyber Pakhtunkhwa Police Act, 2017 (Khyber Pakhtunkhwa Act No. II of 2017) and other relevant provisions of the Pakistan Penal Code.

Sd/-  
**SUPERINTENDENT OF POLICE**  
**HQRS CCP PESHAWAR**

No.479/88/PA

Dated Peshawar the 05/01/2024.

OB NO.96

Dated: 05/01/2024.

Copies to:-

1. The Dy: Inspector General of Police, HQrs Khyber Pakhtunkhwa at CPO Peshawar
2. The Capital City Police Officer, Peshawar
3. The Senior Superintendent of Police, Operations, Peshawar
4. The Senior Superintendent of Police, Coordination, Peshawar
5. The District Police Officer, Khyber
6. The Pay Officer EC-II, QASI, CRC & FMC

(18)

Before the Capital City Police Officer, Peshawar

Subject:- Appeal against the Order dated 05-01-2024, of the Superintendent of Police, Head Quarters, Peshawar, whereby the appellant has been removed from service.

**Respectfully Submitted:-**

That the appellant was enlisted as Special Police Officer (SPO) in the year **2019** and later on Regularized w.e.f from 01-03-2020 along with others and since enlistment the appellant performed his duties with honesty and full Devotion to the entire satisfaction of his high ups. The appellant was transferred to District Khyber on 04-11-2021, where he regularly performed his duties and in the month of October, 2023 fact finding inquiry was initiated and the appellant along with others were brought to police Lines at about 10.00 P.M on leave days, i.e Saturday and Sunday where he was forced to sign a blank paper and was also directed to deposit his Service Book, Service Card, Check Book and ATM Card etc. which are still not returned to the appellant despite repeated requests. The salary of the appellant was subsequently stopped, after the mentioned preliminary inquiry on the allegations of ghost/illegal/Fake employees vide order dated 06-12-2023, and then the appellant was **removed from Police Record** vide Order dated 05-01-2024, which order is illegal and void ab-initio. The appellant was duly enlisted as SPO and later on regularized and he duly performed his duties. Thus the impugned order to the extent of the appellant is not tenable. The appellant was not heard and ex-parte action has been issued against him in violation of the principles of natural justice. No Charge Sheet and Show Causes Notice were issued to the appellant nor was any regular inquiry conducted in the matter. There is no omission or commission on part of the appellant and the appellant could not be punished for the fault of others if any. Strangely the alleged Masterminds have been transferred only and no action has been taken against them, hence the impugned order smacks malice.

**It is therefore requested that on acceptance of this appeal impugned Order dated 05-01-2024 may kindly be set aside and the appellant may kindly be ordered to be reinstated in service with all back benefits.**

Moeen Ali  
Moeen Ali Ali, Ex Constable  
No 1529, Capital City Police,  
Peshawar R/O Gulbela peshawar  
Cell # 0311-9409961

Dated: 02/02/2024



Accepted  
x  
Attached

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Handwritten text

2024 05 07

Handwritten text in Urdu, enclosed in a rectangular border. The text discusses various matters, possibly related to a meeting or a report.

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Handwritten text inside a diamond-shaped box

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Handwritten mark or symbol