


FORM OF ORDER SHEET

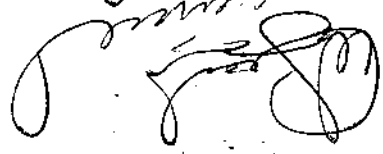
Court of _____

Appeal No. 836/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/06/2024	<p>The appeal of Mr. Muhammad Tahir resubmitted today by Mr. Khiyal Muhammad Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 14.06. 2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

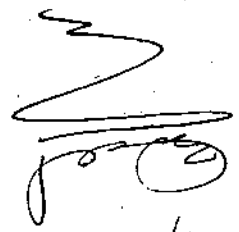
R/Sir

The covered objections categorically in 5
renewed pattern p. 17 changed and Resubmitted
for full processing with request
to early for the best interest of Justice


R/Sir

12-6-24

Serial No 3/1124 has not yet not been
given by the Deptt. so Resubmitted
with comment of all objections



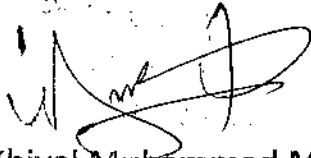
12-6-24

The appeal of Mr. Muhammad Tahir received today i.e on 11.06.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


- ✓ 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no.1 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- ✓ 2- Memorandum of appeal is not signed by the appellant.
- ✓ 3- Copy of Enquiry report mentioned in the memo of appeal is not attached with the appeal with the appeal.
- ✓ 4- Page no. 17 of the appeal is illegible be replaced by legible better one.
- ✓ 5- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. _____ /Inst;/2024/KPST,

Dt. 12/6/2024.



Khial Muhammad Mohmand Adv.
High Court Peshawar.



12/6/24
OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

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

Service Appeal No. 836 /2024

Muhammad Tahir

..... Appellant

VERSUS

Commandant, Special Security and another..... Respondents

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Appellant

Through

Khiyal Muhammad Mohmand
&
Zeeshan Gul
Advocates, High Court

Dated: 10.06.2024

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

Service Appeal No. 836 /2024

Muhammad Tahir,

Sub-Inspector, No. P/290

S/o Muhammad Akram

R/o Mohallah Mitta Khel, Kheeshgi Bala, P.O Kheeshgi
Payan, Tehsil & District Nowshera

..... Appellant

VERSUS

1. Commandant, Special Security Unit (CPEC) Khyber
Pakhtunkhwa, Peshawar
2. Deputy Commandant, Special Security Unit (CPEC)
Khyber Pakhtunkhwa, Peshawar

..... Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER

PAKHTUNKHWA SERVICE TRIBUNAL ACT,

1974 against the impugned Order No. 1475-79/ EC dated 29.05.2024, WHEREBY APPEAL OF THE APPELLANT WAS DISMISSED VIDE ORDER NO. 1475-79/EC DATED 29.05.2024 BY THE RESPONDENT NO. 1, WHICH WAS FILED BY THE APPELLANT AGAINST THE ORDER NO. 1161-73/EC DATED 24.04.2024 OF RESPONDENT NO. 2 BY VIRTUE OF WHICH THE MAJOR PUNISHMENT OF "REDUCTION IN RANK" FROM INSPECTOR TO SUB-INSPECTOR WAS IMPOSED UPON THE APPELLANT AND THE SAME ORDRE WAS MAINTAINED BY THE RESPONDENT No. 1 FOR THE APPELLANT.

PRAYER IN APPEAL:

On acceptance of this Appeal, the impugned order No. 1475-79/EC dated 29.05.2024 and "Reduction in Rank" order no. 1161-73/EC dated 24.04.2024 may kindly be set aside and the appellant may please be restored/ re-instated on his post of Inspector in service with all back benefits/ consequently relief.

Respectfully Sheweth:

1. That the appellant was inducted and appointed in the police service as a Constable on 25.08.1987. (Copy of the Service Card is **Ann-A**)
2. That the appellant after qualifying himself during the course of his service was promoted to the rank of Inspector.
3. That the appellant served with zealous and having unblemished record of service and served according to the satisfaction of high ups and to this effect his ACRs/ PERs bear testimony.
4. That despite the fact the appellant has been implicated on mere suspension and there was no iota evidence in possession of the departmental authorities but the respondents department awarded major penalty reduction in rank from Inspector to Sub-Inspector under Police Rules 1975/ Amended, 2014.
5. That the appellant challenged the impugned order before the Hon'ble Tribunal by filing an

appeal No. 883/2023, which was allowed with direction for denovo inquiry into the matter. (Copy of the order/ judgment dated 07.02.2024 is **Ann-B**).

6. That as per the direction of the Hon'ble Tribunal the respondents/ department contacted Sharjeel Memon, who recorded impartial statement, but the inquiry officer instead of fair denovo inquiry into the matter, played an engineered game and took shelter of one Aqif statement, that the appellant used abusive language to the said constable, but the said constable also submitted statement in favour of the appellant. (Copies of the both statements are **Ann-C & D**)

7. That it is worth to mention that denovo inquiry has been conducted by the respondents with malafide intention and ulterior motive, wherein again the inquiry officer recommended the appellant for imposition of major penal punishment.

8. That respondent No. 2 on the strength of inquiry report passed order No. 1161-73/EC dated 24.04.2024, whereby major penalty of "Reduction in rank" from Inspector to Sub-

Inspector was awarded to the appellant. (Copy of the reduction in rank order is **Ann-E**).

9. That feeling dissatisfied with the reduction in rank order, the appellant filed departmental appeal on 02.05.2024 before the respondent No. 1. (Copy of grounds of appeal is **Ann-F**).

10. That the respondent No. 1 vide order No. 1475-79/EC dated 29.05.2024 rejected the Appeal of the appellant. (Copy of the Order dated 29.05.2024 is **Ann-G**).

11. That feeling aggrieved from the impugned Order No. 1475-79/EC dated 29.05.2024 of the Respondent No. 1 and Reduction in Rank order No. 1161-73/EC dated 24.04.2024 of respondent No.2, the appellant is constraint to file the instant appeal on the following grounds inter alia:

GROUND:

A. That the impugned Appellate Order No. 1475-79/EC dated 29.05.2024 of the respondent No. 1 by virtue of which Departmental Appeal/Presentation of the appellant was rejected and reduction in rank order No. 1161-73/EC dated 24.04.2024 of respondent No. 2, whereby the

appellant was imposed major penalty of reduction in rank in service are coram non iudice, illegal, without jurisdiction and lawful authority, against the principles of natural justice, without any rhymes and reasons, hence liable to set aside.

- B. That impugned order are illegal and unjust and in violation of rules and law applicable to the matter.
- C. That the appellant rendered unblemished services in the police force without any criminal history and without any involvement in any kind of illegal activities but still awarded major penalty of reduction in rank.
- D. That admittedly there is no confession or admission recorded till date against the appellant as well as by the witnesses but the inquiry officer did great miscarriage of justice.
- E. That the respondents/ department in denovo inquiry, again failed to prove any allegations against the appellant but despite these fact, the appellant is made a rolling stone just to deprive him from further promotion on the basis of baseless allegation.

- F. That there is no truth in the allegations mentioned in the impugned orders.
- G. That the respondents issued the impugned orders in a slip shot and arbitrary manner just to delay the promotion of appellant, because the family of appellant was suffered in a blood feud enmity since 2008 to 2022.
- H. That the orders of "Reduction in Rank" are against the principle of natural justice, equity and fair play and is a colourful exercise of powers by respondents/department.
- I. That the proceedings carried out in the case suffered from gross legal infirmities such as violation of fundamental rights as period for punishment was not specified and imposed major penalties retrospectively.
- J. That any other grounds would be adduced by the appellant during arguments on the instant appeal with permission of this Hon'ble Tribunal.

It is, therefore, most humbly prayed that on acceptance of this appeal the impugned order

No. 1475-79/EC dated 29.05.2024 and "Reduction in Rank" order no. 1161-73/EC dated 24.04.2024 may kindly be set aside and the appellant may please be restored/ re-instated on his post of Inspector in service with all back benefits/ consequently relief.

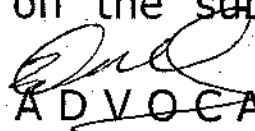
Any other relief not specifically asked for, may also be granted.

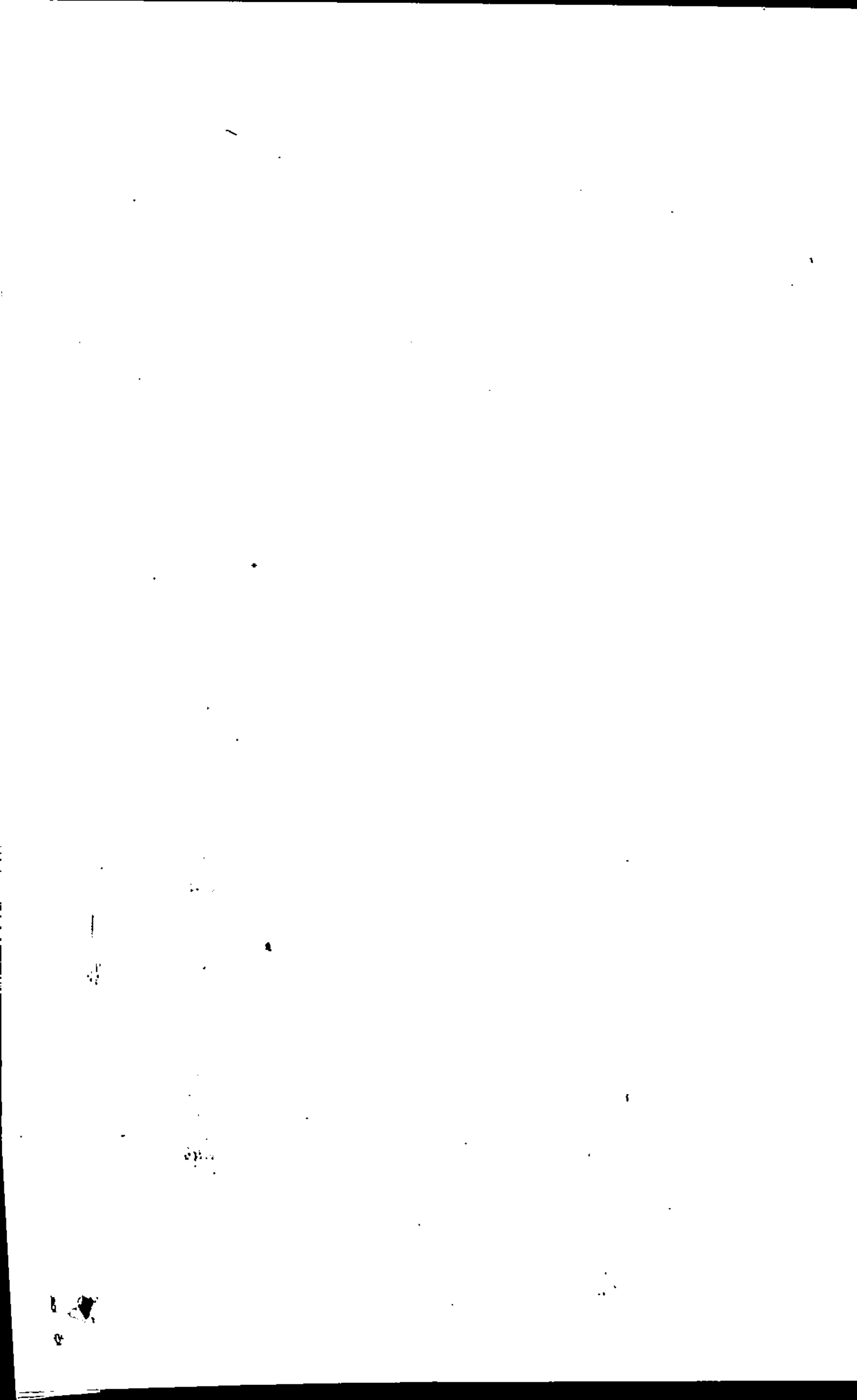
Appellant
Through,
Khiyal Muhammad Mohmand
&
Zeeshan Gul
Advocates, High Court

Dated: 10.06.2024

CERTIFICATE

Certified that as per instructions of my client, that this is the first Service Appeal on the subject before this Honourable Tribunal.


ADVOCATE



9

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

Service Appeal No. _____/2024

Muhammad Tahir

..... Appellant

VERSUS

Inspector General of Police / Provincial Police Chief,
Central Police office (CPO) and others Respondents

AFFIDAVIT

I, Muhammad Tahir, Sub-Inspector, No. P/290 S/o Muhammad Akram R/o Mohallah Mitta Khel, Kheeshgi Bala, P.O Kheeshgi Payan, Tehsil & District Nowshera, do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

[Signature]

Deponent

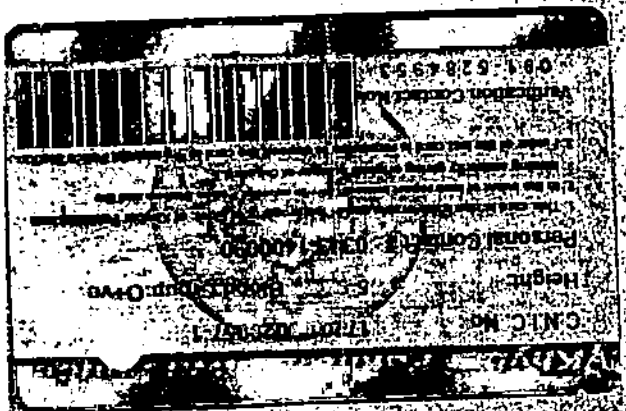
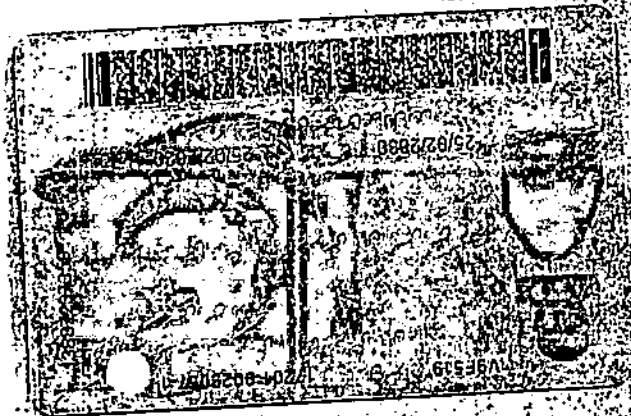
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Cell: 0343-1400090

[Signature]
ATTESTED



10-6-2024



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.883/2023



BEFORE: MRS. RASHIDA BANO ... MEMBER (J)
MR. MUHAMMAD AKBAR KHAN... MEMBER (E)

Muhammad Tahir, Sub Inspector, No. P/290 S/o Muhammad Akram R/o Mohallah Mitta Khel, Khessghi Bala, P.P Kheeshgi Payan, Tehsil & District Nowshera.

.... (Appellant)

VERSUS

1. Inspector General of Police/ Provincial Police Chief, Central Police Officer, Khyber Road, Peshawar.
2. Commandant, Special Security Unit (CPEC) Khyber Pakhtunkhwa, Peshawar.
3. Deputy Commandant, Special Security Unit (CPEC) Khyber Pakhtunkhwa, Peshawar. (Respondents)

Mr. Khiyal Muhammad
Advocate

.... For appellant

Mr. Asif Masood Ali Shah
Deputy District Attorney

.... For respondents

Date of Institution..... 17.04.2023
 Date of Hearing..... 07.02.2024
 Date of Decision..... 07.02.2024

JUDGMENT

RASHIDA BANO, MEMBER (J): The instant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as below:

“On acceptance of this appeal, the impugned order dated 12.04.2023 and reduction in rank order dated 08.03.2023 may kindly be set aside and the appellant may please be restored/reinstated on his post of Inspector in service withal back benefits/consequently relief.”

ATTESTED
[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

1. Brief facts of the case as given in the memorandum of appeal are that the appellant was inducted in police department as Constable on 25.08.1987 and

[Handwritten mark]

was promoted to the rank of Inspector. The appellant was performing his duties with zeal and zest. During service departmental proceedings were initiated against the appellant on the ground that he provided SSU official to private business man without proper permission of competent authority which culminated into reduction in rank from inspector to Sub-Inspector vide order dated 08.03.2023. Feeling aggrieved, he filed departmental appeal which was rejected on 12.04.2023, hence the instant service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned Deputy District Attorney and perused the case file with connected documents in detail.

4. Learned counsel for the appellant argued that appellant has not been treated in accordance with law and rules. He further argued that the impugned orders passed by the respondents are *Coram non judice*, illegal, without jurisdiction, lawful authority and against the principle of justice, hence not tenable in the eyes of law. He further argued that in inquiry not proper procedure has been adopted and the appellant neither given any opportunity of defence nor cross examination of witnesses was provided to the appellant which against the law and rules. Lastly, he submitted that no opportunity of personal hearing was afforded to appellant and he condemned unheard. He therefore, requested for acceptance of the instant service appeal.

5. Conversely, learned District Attorney contended that appellant has been treated in accordance with law and rules. He further contended that appellant was proceeded against departmentally on the grounds of the he had provided SSU officials as gunner to a private businessman at Islamabad without any proper permission of the competent authority. A proper departmental enquiry into the matter was initiated against him by appointing Mr. Amir Hussain SP

ATTESTED


EXAMINER
Shaher Pakhtunkhwa

SSU, Mardan as enquiry Officer and after fulfillment of all codal formalities the competent authority awarded major penalty of reduction in rank.

6. Perusal of record reveals that appellant was enlisted as constable in respondent department on 25.08.1987 who was lastly promoted as Inspector. Appellant was served with charge sheet and statement of allegation on 21.12.2022 with the allegation that he had deputed/provided his gunner namely Akif Hussain No. 781, Usman No. 8085 and Kamran No. 906 for security of a private business man namely Sheryar Memon at Islamabad and he on the eve of his transfer from Mardan to Balakot took his gunner to Balakot without prior permission or order of his high-ups. Appellant properly replied charge sheet wherein appellant denied from the fact of giving his gunner to any businessman and stated that he himself was residing in rented house at Islamabad due to his enmity at his native village. Inquiry officer submitted report and found him guilty.

7. Authority without issuing final show cause notice imposed major punishment of reduction in rank from Inspector to Sub Inspector. Perusal of Enquiry report reveals that statement of Akif Khan, Constable No. 781, Usman No. 808 and Muhammad Kamran No. 906 were recorded by the Enquiry Officer neither chance of cross examination was provided to the appellant nor his statement were recorded in the presence of appellant which is against the basic rule of fair trial and inquiry. Moreover, inquiry officer also mentioned in inquiry about data of cell phone of constable which was also not provided to the appellant, which means appellant was condemned unheard. It is also pertinent to mention here that neither final show cause was issued nor any chance of personal hearing was provided to the appellant which is against the rules on the subject.


8. It is a well settled legal proposition that regular inquiry is must before imposition of major penalty, whereas in case of the appellant, no such inquiry


ATTESTED

 EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

was conducted. The Supreme Court of Pakistan in its judgment reported as 2008 SCMR 1369 has held that in case of imposing major penalty, the principles of natural justice required that a regular inquiry was to be conducted in the matter and opportunity of defense and personal hearing was to be provided to the civil servant proceeded against, otherwise civil servant would be condemned unheard and major penalty of dismissal from service would be imposed upon him without adopting the required mandatory procedure, resulting in manifest injustice. In absence of proper disciplinary proceedings, the appellant was condemned unheard, whereas the principle of *audi alterm partem* was always deemed to be imbedded in the statute and even if there was no such express provision, it would be deemed to be one of the parts of the statute, as no adverse action can be taken against a person without providing right of hearing to him. Reliance is placed on 2010 PLD SC 483.

9. For what has been discussed above, we are unison to set aside the impugned order dated 08.03.2023 and appellate order dated 12.04.2023 with direction to the respondents to conduct denovo and provide proper chance of hearing, self defence and more specifically cross examination of fair trial with further direction to conclude inquiry within sixty days receipt of this order. Costs shall follow the events. Consign.

10. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 7th day of February, 2024.*


 (MUHAMMAD AKBAR KHAN)
 Member (E)


 (RASHIDA BANO)
 Member (J)

*Kaleemullah

Date of Presentation of Application 27-2-24 Certified to be true copy

Number of Words 47

Copying Fee 20/-

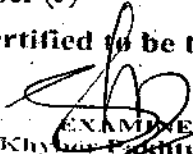
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Date of Completion of 27-2-24

Date of Delivery of Copy 27-2-24



 EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar


ORDER

2. 2024 1 Learned counsel for the appellant present. Mr. Asif Masood Ali Shah learned Deputy District Attorney alongwith Khayal Roz, Inspector for the respondents present..

2. Vide our detailed judgement of today placed on file, we are unison to set aside the impugned order dated 08.03.2023 and appellate order dated 12.04.2023 with direction to the respondents to conduct denovo and provide proper chance of hearing, self defence and more specifically cross examination of fair trial with further direction to conclude inquiry within sixty days receipt of this order. Costs shall follow the events. Consign.

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 7th day of February, 2024.*


(Muhammad Akbar Khan)
Member (E)


(Rashida Bano)
Member (J)

16

Am - C²

PERSONAL STATEMENT

I, Shaheryar Memon son of Abdul Razzaq Memon holder of NICOP No.13302-0903650-3, do hereby record my statement on oath:-

That I am overseas Businessmen and I do not know to subject of inquiry Mr. Muhammad Tahir (inspector) as we never met before and I kindly request to be kept out of any proceedings involved Mr. Muhammad Tahir, I have no connection or prior acquaintance with him. This will allow me to focus on my business without any mental distractions or Pressure.

Best Regards:



SHAHERYAR MEMON
+92323-6666666
+97152-3517778
22-03-2024



MHSSUCPCRWCS

cc. Mr. SSU Riaz
22-03-2024

CNIC : 17202-0393241-7

Mob: 0318-0958138

13 مارچ 2013ء کو

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پتہ

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پتہ

13 مارچ 2013ء کو



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

CENTRAL POLICE OFFICES, S.A.Q ROAD, PESHAWAR CANTT (PH: 091-5284319)



No. 1161-73 /EC,

dated Peshawar the 24/04/2024.

ORDER


1. This office order will dispose-off the departmental proceedings against **Inspector Muhammad Tahir No. P/290** on the charges/allegations that he while posted at Rashakai Economic Zone, District Nowshera had provided SSU officials namely Akif Hussain No. 781, Usman No. 808 and Kamran No. 906 as gunners with a private businessman named Shehryar Memon at Islamabad without approval or permission of the competent authority.

2. In this regard, proper departmental proceeding was initiated against him. He was issued charge sheet along with summary of allegation vide Endst: No. 630/EC, dated 06.03.2024 & Mr. Shakeel Khan DSP HQrs SSU (CPEC) was nominated as enquiry officer to conduct inquiry into the matter, who after fulfilling all codal formalities submitted his findings report, wherein he reported that charge sheet alongwith summary of allegations were served upon him and his written statement was recorded. The enquiry officer also recorded statement of all officials / others related to the subject case. The enquiry officer further reported that during the course of inquiry a daily diary No. 09, dated 20.03.2024 forwarded by DSP Security Remodeling of Warsak Canal System vide letter No. 494-97/R/DSP/RWCS/SSU, dated 20.03.2024, wherein it was reported that Inspector Muhammad Tahir contacted Constable Akif Hussain No. 781 on his personal mobile number 0318-0958138, used abusive language and threatened him with dire consequences for not recording his statement in favor of him, who is the key witness of the inquiry. Thus, the enquiry officer found him guilty of the charges leveled against him and recommended him for major punishment.

3. Later on, he was issued/served with final show cause notice vide this office No. 845/EC, dated 25.03.2024 to which he replied the same. He was also heard in orderly room held on 24.04.2024 and given ample opportunity to prove himself innocent of the charges leveled against him but he failed to satisfy the undersigned.

4. Keeping in view of the above facts, recommendation of the enquiry officer as well as other material available on record, the above named Inspector had provided his official gunners to unauthorized person. Being discipline force, this act is highly objectionable and against the norms of law & rules. Therefore, I, Deputy Commandant SSU (CPEC), being the competent authority in exercise of powers vested to me under section 4(b) of Khyber Pakhtunkhwa, Police Rules 1975 (amended in 2014) hereby awarded Major Punishment to defaulter Inspector Muhammad Tahir No. P/290 "Reduction in rank" from Inspector to Sub inspector with immediate effect.

Order Announced.


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

Copy of the above is forwarded for information to the:

1. All SsP SSU (CPEC), Khyber Pakhtunkhwa.
2. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
3. PA to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
4. Supdt: E-II and Incharge Secret Branch CPO, Peshawar.
5. Accountant, SRC, EC SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
6. Official Concerned.

23

Am - F²

To,

The Commandant Special Security Unit (CPEC),

Khyber Pakhtunkhwa, Peshawar.

Subject: **Departmental Appeal against the reduction**
Order of appellant from Inspector to Sub-
Inspector.

Prayer in Appeal:

By accepting this Departmental Appeal, the reduction order may kindly be set aside and the appellant may be restored on his post/Pay scale with all back benefits in the best interest of justice.

Respected Sir,

With due respect and reverence, it is submitted.

1. That the appellant is serving in the Police Department on the post of Sub-Inspector since long.
2. That earlier the rank of the appellant was Inspector, which rank was reduced to Sub-Inspector vide Order No. 640-55/EC Dated 08.03.2023.
3. That for redressal of his grievances, the appellant approached to the Hon'ble Service Tribunal whereas his appeal was allowed with direction for denovo inquiry vide

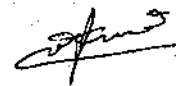
order/ judgment dated 07.02.2024. (Copy of the judgment is **Ann-A**).

4. That in the light of judgment, the department conducted denovo inquiry but the Inquiry Officer instead of conducting fair inquiry in the subject matter, gone beyond his jurisdiction by ignoring the actual facts and took shelter of a baseless issue that the appellant used abusive language to one Akif Hussain Constable. (Copy of the statement in favour of appellant is **Ann-B**).
5. That now on the recommendation of the above baseless inquiry, again a copy paste order is passed against the appellant of reduction in rank vide order No. 1161-73/EC dated 24.04.2024. (Copy of the order is **Ann-C**).
6. That the appellant rendered unblemished services in the police force without any criminal history and without any involvement in any kind of illegal activities but still awarded major penalty of reduction in rank of appellant.
7. That admittedly there is no admission/confession recorded till date against the appellant as well as the police official.
8. That there is no truth in the allegations mentioned in the impugned orders and is violation of the Police Acts, Policies and Rules.

9. That the Police Department issued the impugned order in a slip shot and arbitrary manner.
10. That as per law and policy on the subject, the appellant was entitled for promotion but the Department had reduced the rank of appellant from Inspector to Sub-inspector, which act of the Department is illegal and ineffective upon the rights of the appellant.

It is, therefore, most humbly prayed that reduction order may kindly be set aside and the appellant may be restored on his post/Pay scale with all back benefits in the best interest of justice.

Appellant,



Inspector Tahir Khan
No. P/290
Cell No. 0343-1400090

Dated: 02.05.2023

23

Ann-61



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



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

No. 1475-79/EC,

dated Peshawar the 29/05/2024.

ORDER

This order will dispose of the formal departmental appeal preferred by Sub-Inspector Muhammad Tahir No. 290/P of Special Security Unit (CPEC) against the order of Deputy Commandant SSU (CPEC), wherein he was awarded major punishment of "Reduction in Rank" from Inspector to Sub-Inspector on the allegations that while posted at Rashakai Economic Zone, District Nowshera had provided SSU officials namely Atif Hussain No. 781, Usman No. 808 and Kamran No. 906 as gunners to a private businessman named Shehryar Memon at Islamabad without approval or permission of the competent authority.

In this regard, proper departmental inquiry was carried out. He was issued/served with charge sheet and summary of allegation. After completion of all requisite formalities, the enquiry officer reported that the alleged Inspector was found guilty of the charges leveled against him and recommended him for major punishment.

Later on he was issued/served with final show cause notice and also heard in person by the competent authority SSU (CPEC) but failed to satisfy him.

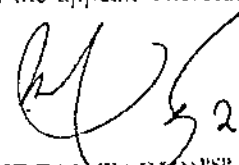
In the light of recommendation of enquiry officers and other material available on the record, he was awarded major punishment of "Reduction in Rank" from Inspector to Sub-Inspector vide order No. 1161-73/EC, dated 24.04.2024.

Feeling aggrieved against the impugned orders of Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 22.05.2024.

During the course of personal hearing, the applicant failed to prove himself innocent of the charges leveled against him. From perusal of enquiry file it has been found that the allegations were fully established against him by the Enquiry Officer during the course of enquiry. There doesn't seem any infirmity in the order passed by the competent authority, therefore, no ground exist to interfere in same.

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

Order announced.

 29/05/24.

(IRFAN TARIQ)^{PSP}
COMMANDANT,
Special Security Unit (CPEC),
Khyber Pakhtunkhwa,
Peshawar.

29-05-2024

Copy of the above is forwarded for information to the:

1. Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
2. SP Admin & Minority SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
3. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
4. Official Concerned.

قیمت 50 روپے	39879	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈریس: <u>خیال ٹرسٹ</u>	PESHAWAR BAR ASSOCIATION	
بار کونسل ایسوسی ایشن نمبر: <u>11-1577</u>		
رابطہ نمبر: <u>0321-9587361</u>		

بعدالت جناب: Respectable Honorable Judge

مخانب: <u>Appellee</u>	دعویٰ: <u>سروس اجرت</u>
<u>محمد طاہر ای. سی</u>	علت نمبر:
<u>بنام</u>	موضوع:
<u>1074 اپیل وینڈہ</u>	جرم:
	تھانہ:

بابت تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی کاروائی متعلقہ
 آن مقام ایڈووکیٹ خیال ٹرسٹ کے لیے محمد طاہر ای. سی اور محمد طاہر ای. سی کیلئے
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ میں کاروائی کا کمال اختیار و حق وکیل صاحب کو
 راضی نامہ کرنے و تقریر کرانے کیلئے بر حلف رہے جو اب دعویٰ اقبال و دعویٰ اور درجہ اولیٰ ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا طرفہ یا اپیل کی صورت میں اور منسوخی، نیز
 دائر کرنے اپیل کی صورت میں و پیروی کے اختیار ہوگا اور اس کے لئے درجہ اولیٰ مقدمہ میں ہر قسم کے کل یا جزوی
 کاروائی کے واسطے کل یا مختار ہوگا اور اس کے لئے درجہ اولیٰ مقدمہ میں ہر قسم کے کل یا جزوی
 مقرر شدہ کو وہی جملہ پر درجہ اولیٰ مقدمہ میں ہر قسم کے کل یا جزوی مقدمہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جہات کے لئے متعلقہ کے سبب سے ہوگا اس کے لئے درجہ اولیٰ مقدمہ یا حد سے
 باہر ہو تو وکیل صاحب یا پیروی کے لئے درجہ اولیٰ مقدمہ میں ہر قسم کے کل یا جزوی مقدمہ منظور و قبول ہوگا



الرقوم: 1016/2024

Accepted

مقام ایڈووکیٹ

محمد طاہر ای. سی

نوٹ: اس وکالت نامہ کی فوٹو کاپی نام قابل قبول ہوگی۔

محمد طاہر ای. سی
 محمد طاہر ای. سی
 محمد طاہر ای. سی