Form-A

FORMOF ORDERSHEET

Court of_____

Case No. 921/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	03.07.2024	As per direction of the Hon'ble Member Judicial the present appeal is fixed for preliminary hearing before Single Bench at Peshawar on 08.07.2024. Parcha Peshi giving to the counsel for the appellant. REGISTRAR

Respected Madam,

It is submitted that the present appeal was received on 13.05.2024, which was returned to the counsel for the appellant for removing objections (Flag-A) within 15 days. The appeal was to be resubmitted on 28.05.2024.Today i.e. on 28.06.2024 the learned counsel for the appellant re-filed the same late by 31 days.

The appeal is submitted to your Honour under rule-7(c) of Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

REGISTRAR
28/6/24

Hon'ble Member -J.

Be fix before Tribunal for hearing
3/7/24.

The appeal of Mr. Inam Ullah received today i.e on 13.05.2024 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, 2 & 3 are un-necessary/improper parties, 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- Address of appellant is incomplete be according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
3- Memorandum of appeal is not signed by the appellant.
4- Annexures of the appeal are unattested.
5- Annexure-A of the appeal is illegible.
6- Necessary party be made in the heading of appeal.
7- 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. 28 /Inst./2024/KPST,

Dt. 14/05/2024.

14/5/24

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M. Ayaz Khan Adv.
High Court Peshawar.

Objections has been removed
Resubmitted
28/6/24

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A.No. 921 /2024

Inamullah

VERSUS

Superintendent of Police and Others

INDEX

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Through

Appellant

Muhammad Ayaz khan

And

Jan Muhammad

ADVOCATE HIGH COURT

And

Israr Iqbal Advocate

Dated. _____/2023

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. 921 /2024

INAMULLAH S/O SHAKIRULLAH
R/O Tarkha , akbarpura,tehsilpabbi, District nowshera .

..... Appellant

VERSUS

Provincial Police Officer/Inspector General of Police, KPK Peshawar.

..... Respondents

APPEAL U/S 4 OF KP SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 31/05/2018 WHEREBY THE APPELLANT WAS AWARDED MAJOR PENALTY OF DIMISSAL FROM SERVICE AS WELL AS AGAISNT THE ORDER DATED 31/05/2023 WHEREBY HIS DEPARTMENTAL APPEAL WAS TURNED DOWN.

Respectfully Sheweth

1. That the appellant is the son of Shaheed FC shakirullahNo 973/CCP(Constable) who has been martyred during absconding terrorist confrontation with police at baddaber on 3rd April,2010. (copy of Fir and news reports are attached as annexure-A)

2. That the appellant submitted an application for the job in police department under shahudapakage.

3. That on 05/04/2017 the appellant was appointed as a junior clerk (BS-11) vide notification No.1980/E-V and posted to the office of SSP traffic ,Peshawar vide orderNo.2661/E-V Dated 10/05/2017 for onward basic

training at maliksaad Shaheed police lines.**(copy of appointment order and notification are attached as annexure-B)**

4. That the appellant could not attend the training session regularly because he was receiving life threats as his father was died in the clash with absconding terrorist confrontation back in 2010.
5. That the respondent no. 04 issued a show cause notice and resultantly enquiry was levelled against the appellant .**(copy of show cause notice is attached as annexure-C)**
6. That on the recommendation of enquiry committee ,the appellant was dismissed from the service vide order NO. 2818-26/E-V,dated 31/05/2018 ,and the appellant was not informed nor any copy of the order was issued in writing to the official concerned .**(copy of the impugned order is attached as annexure-D)**
7. That the appellant preferred a departmental appeal through provincial police officer (PPO), Central police office, KPK, Peshawar on 22/08/2023 which was turned down for being time barred.**(Copy of departmental appeal and order are attached as annexure-E)**
8. That feeling aggrieved, the appellant seeks indulgence of this honorable Tribunal, *inter alia,* on the following grounds.

GROUNDS.

A. That the impugned order as well as the order passed by the Departmental Authority are based on conjectures and surmises, hence untenable.

B. That admittedly, the appellant was not associated with any sort of inquiry, therefore, the impugned order has nullity in the eyes of law.

C. That the impugned order carries no reason, what to speak of a plausible one, hence goes contrary to section 24-A of the General Clauses Act 1897. On this score too, the impugned order needs rectification by the Honorable Tribunal.

D. That the order passed by the Departmental Authority is also non speaking one, as the same lacks reason and logic which is against the principles of fair play and justice.

E. That the impugned order has been passed at the back of the appellant hence it is against the norms of justice.

F. That the appellant has not been treated in accordance with law rather he has been discriminated, which goes contrary to Articles 4 and 25 of the Constitution of Pakistan 1973, hence needs rectification by the Hon'ble Tribunal.

G. That the impugned orders are against the law, rules and policy on the subject, hence untenable.

H. That the appellant seeks leave of the Hon'ble Tribunal to urge additional grounds at the time of arguments.

PRAYER:

In view of the foregoing facts, it is, therefore, most humbly prayed that the impugned orders dated 31/05/2018 and 07/09/2023 may please be set aside and the respondents be please directed to reinstate the appellant into service with all back benefits.

Any other remedy to which the appellant is found fit in law, justice and equity may also be granted.

Appellant

Through

Muhammad Ayaz khan

And

Jan Muhammad
ADVOCATE HIGH COURT

And

Israr Iqbal Advocate

AFFIDAVIT

It is hereby verified and declared on oath that the contents of above Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S.A No. _____/2024

Inamullah.....**Appellant**

V E R S U S

SP Investigation and others.....**Respondents**

AFFIDAVIT

I, **Inamullah S/o Shakirullah r/o Tarkha, Akbarpura, Tehsil Pabbi District Nowshera**, do herby solemnly affirm and declare on oath that the contents of accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

D E P O N E N T

ATTESTED
MUHAMMAD SHAFIQ ADVOCATE
OATH COMMISSIONER
HIGH COURT PESHAWAR

A (6)

ابتدائی اطلاعی رپورٹ

[illegible]

ابتدائی اطلاع نیچے درج کرو

Better Copy of the Page No. 6

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 154 مجموعہ ضابطہ فوجداری

تھانہ: بڈھ بیر ضلع: پشاور

علت: 207 تاریخ: 03/04/2010 وقت 06:45 بجے

1	تاریخ ووقت رپورٹ: 03/04/2010 وقت 09:00 بجے	چاکیدگی 03/04/2010 وقت 09:45 بجے
2	نام وسکونت اطلاع دہندہ مستغیث	عاقل شاہ SI انچارج چوکی سیفن
3	مختصر کیفیت جرم (معہ دفعہ) اگر کچھ لیا گیا ہو۔	302/324/353/3-4/5 ExP, Bus Act/ 7ATA/ 13 A, 148/149
4	جائے وقوعہ فاصلہ تھانہ سے اور سمت	مکان مجرمان اشتہاری احسان اللہ وغیرہ واقع کمال
5	نام وسکونت ملزم	
6	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	برسیدگی مراسلہ پرمقدم درج رجسٹر کیا جاتا ہے
7	تھانہ سے روانگی کی تاریخ ووقت	بطور سپیشل رپورٹ

ابتدائی اطلاع نیچے درج کرو۔

بوقت صد ڈر بجہ ایک تحریری مراسلہ منجانب مستغیث خانہ نمبر 2 بدست کانسٹیبل محمد علی 1232 موصول ہو کر ذیل ہے' محرر تھانہ بڈھ بیر اطلاع تھی کہ مجرمان اشتہاری دہشت گرد احسان اللہ عرف اولا گے' عرفان' نگار' عظمت' نادر پسران ارسلا خان ساکنان سربند محلّہ دولت زئی مطلوبہ مقدمات (1) علت 458' مورخہ 28/12/2027 جرم 302/34 (2) علت 398 مورخہ 15/10/2008 جرم 324/148/149 (3) علت 478 مورخہ 10/10/2007 جرم 506/34 (4) علت 357 مورخہ 29/08/2008 جرم 506/447/34 (5) علت 45 مورخہ 26/02/2009 جرم 302/324/34 تھانہ سربند مجرجم اشتہاری یعقوب ولد مراد ساکن سربند محلّہ دولت زئی مطلوبہ مقدمات مورخہ 30/18/2002 جرم PPC 324 تھانہ پشتہ خرہ اپنے گھر واقع شیخان علاقہ تھانہ بڈھ بیر مسلح بہ اسلحہ آتشین موجود ہیں' اطلاع پر محمد ریاض خان SHO بڈھ بیر بمعہ میر قلم SI' آصف خان SI' برہان الدین SI' سید الرحمٰن SI' کرم الٰہی ASI' شیر احمد ASI' عزت خان ASI نفری پولیس نفری چوکیات نفری فرنٹیر کانسٹیبلری کے ہمراہ متذکرہ مجرمان اشتہاری دہشت گردوں کے مکان پر چھاپہ لگایا گیا اور محمد خان اشتہاری دہشت گردوں کی گرفتاری دینے کیلئے للکارے' ملزمان نے گرفتاری دینے کے بجائے ہم پولیس پارٹی پر بہ ارادہ قتل فائرنگ شروع کی اور ہینڈ گرنیڈ بھی پولیس پارٹی پر پھینک کر دھماکہ ہوئے' ہم پولیس پارٹی نے بھی حق حفاظت خود اختیار کی خاطر فائرنگ شروع کی' تقریباً ایک گھنٹہ فائرنگ لگا

ATTESTED

تار ہوا' امدادی نفری وپلیس بھی پہنچ آئی' فائرنگ بند ہونے پر ملزمان کے فائرنگ سے محمد ریاض SHO' میر قلم خان SI' کانسٹیبل شاکر 923 لگ کر شہید ہوئے جبکہ کانسٹیبل موسیٰ 3965/FC' مراجولی 579/FC شدید زخمی ہوئے جبکہ ملزمان میں سے احسان اللہ' عظمت' نگار' عرفان' نادر پسران ارسلا' یعقوب ولد مراد لگ کر ہلاک ہو چکے ہیں جبکہ دو ملزمان اسمائے مسکن نامعلوم بھی ہلاک پڑے پائے' احسان اللہ کے قبضہ سے ایک ضرب کلاشنکوف نمبر 4739 لوڈ شدہ' 3 عدد کارتوس' 2 عدد خالی چارجر ایک ہینڈ گرنیڈ' عرفان کے قبضہ سے ایک ضرب کلاشنکوف 1478 لوڈ شدہ 40 عدد کارتوس بمعہ سپیئر خالی چارجر ایک عدد ہینڈ گرنیڈ' نگار کے قبضہ سے ایک کلاشنکوف نمبر 6830 لوڈ شدہ 6 عدد کارتوس۔۔۔۔۔۔خالی چارجر ایک گرنیڈ عظمت کے قبضہ سے ایک ضرب کلاشنکوف نمبر 1448 لوڈ شدہ 6 عدد کارتوس۔۔۔۔۔ایک خالی چارجر ایک گرنیڈ' نادر کے قبضہ سے ایک ضرب کلاشنکوف نمبر 1123 لوڈ شدہ 6 عدد کارتوس۔۔۔۔۔2 عدد کارتوس۔۔۔۔2 عدد خالی چارجر جبکہ ملزمان نامعلوم کے قبضہ سے ایک ضرب کلاشنکوف 3113 لوڈ شدہ 20 عدد کارتوس ہینڈ لیٹر 2 عدد خالی چارجر جبکہ دوسرے نامعلوم لزم کے قبضہ سے ایک ضرب رائفل نمبری 7364 لوڈ شدہ 4 عدد کارتوس برآمد ہو کر بروئے فرد قبضہ پولیس میں کر کے دیگر پولیس اہلکار بال بال بچ گئے' مقتولین مجروحین کے فرد صورتحال نقشہ ضرر ہائے بمطاقب زخمات مرتبک رکے زیر حفاظت سلطان روم SI بمعہ پولیس گارڈ LRH-KMC بھجوائے گئے' حالات واقعات سے صورت جرائم بالا پائے جاتے ہیں' افسران بالا صاحبان موقع پر پہنچ آئے ہیں' فرار شدہ ملزمان کی گرفتاری درپیش ہے' مراسلہ بغرض قائمی مقدمہ بدست کانسٹیبل محمد علی 1232 ارسال تھانہ ہے' نقل پرچہ بغرض تفتیش خالداد حوالہ انسپکٹر صاحب کیا جاوے' دستخط انگریزی عاقل شاہ خان SI انچارج چوکی حسین مورخہ 03/04/2010 کارروائی تھانہ آمدہ مراسلہ حرف بہ حرف درج ہو کر پرچہ بجرم درج رجسٹر کر کے افسران بالا کو بطور سپیشل رپوٹر اطلاع دی جاتی ہے' نقل پرچہ بغرض تفتیش والہ خالقداد خان INSP/CIO کیا جاتا ہے' پرچہ بطور سپیشل رپورٹ گزارش ہے' دستخط انگریزی مورخہ 03/04/2010

ATTESTED

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روشن کل کی شہادت، آج کا نصب العین

آج

پشاور

پاکستان

آزادی کے تحفظ وقت شائع ہونیوالا صوبہ سرحد کا کثیر الاشاعت اخبار

شمارہ 85 | 18 اپریل 2010ء | 1431 ہجری | 10 جلد

بڈبیر مقابلہ ایس ایچ او سمیت 3 اہلکار جاں بحق 8 مفرور ہلاک

پولیس کا شیخان میں مکان کا محاصرہ ملزموں کی پولیس پر فائرنگ

جوابی کارروائی میں 5 بھائیوں سمیت 8 اشتہاری مارے گئے

پشاور (بیورو رپورٹ) تھانہ بڈبیر کے علاقہ شیخان میں پولیس اور اشتہاری ملزموں [illegible] تصادم کے نتیجے میں تھانہ بڈبیر کے ایس ایچ او پولیس چوکی کے انچارج سمیت تین اہلکار [illegible] جبکہ پولیس نے جوابی کارروائی کرتے ہوئے 8 اشتہاری ملزموں کو ہلاک کر دیا [illegible]

اور ریاض چوکی انچارج میر قلم خان اور کانسٹیبل شاکر موقع پر جاں بحق

اہلکار اور ایک مرغی فروش سمیت تین شہری زخمی ہوئے مفرور ملزموں کے [illegible]

میں پانچ بھائی اور ان کا ماموں بھی شامل ہے جبکہ دونوں طرف فائرنگ کے دوران دو پولیس اہلکار اور راہگیر خاتون زخمی ہوگئی پولیس اور ملزموں کے مابین فائرنگ کا تبادلہ دو گھنٹے تک جاری رہا جس کے باعث [illegible] ملانے میں خوف کی لہر دوڑ گئی پولیس نے ملزموں کے لینے سے (باقی صفحہ 10 بقیہ نمبر 1)

چوکی انچارج

پشاور (بیورو رپورٹ) تھانہ بڈبیر کے علاقہ شیخان میں پولیس مقابلے میں شہید ہونے والے چوکی انچارج میر قلم خان کو شہید 2 سال سے زائد عرصہ پولیس چوکی میں بطور انچارج فرائض انجام دے رہا تھا معلوم ہوا ہے کہ (باقی صفحہ 10 بقیہ نمبر 2)

جاں بحق اہلکاروں کی اجتماعی نماز جنازہ

نماز جنازہ میں گورنر، وزیر اعلیٰ، آئی جی سمیت دیگر اعلیٰ حکام کی شرکت

شہید ریاض خان کو پولیس مقابلوں میں مہارت حاصل تھی

پشاور (بیورو رپورٹ) بڈبیر کے علاقہ شیخان | پشاور (بیورو رپورٹ) محکمہ پولیس میں پولیس ہاؤس پولیس مقابلے میں شہید ہونے والے مقابلے میں اعلیٰ کارکردگی کا مظاہرہ کرنے والے قائد (باقی صفحہ 10 بقیہ نمبر 3) ایس ایچ او (باقی صفحہ 10 بقیہ نمبر 4)

اتصالات افغانستان بات ک

دل سدھ سنت کا . . .

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روزنامہ آج پشاور پاکستان

ایڈیٹر عبدالواحد یوسفی

صفحات 12

جلد 21 | اتوار 4 اپریل 2010ء 18 ربیع الثانی 1431ھ | شمارہ 85

بڈبیر مقابلہ ایس ایچ او سمیت 3 اہلکار جاں بحق 8 مفرور ہلاک

پولیس کا شیخان میں مکان کا محاصرہ ملزموں کی پولیس پر فائرنگ

جوابی کارروائی میں 5 ملزم سمیت 8 اشتہاری مارے گئے

پشاور (نمائندہ خصوصی) تھانہ بڈبیر کے علاقہ شیخان میں پولیس اور اشتہاری مفروروں کے درمیان تصادم کے نتیجے میں تھانہ بڈبیر کے ایس ایچ او پولیس چوکی کے انچارج سمیت تین اہلکار جاں بحق جبکہ پولیس نے جوابی کارروائی کرتے ہوئے 8 اشتہاری مفروروں کو ہلاک کر دیا۔ [illegible]

جاں بحق اہلکاروں کی اجتماعی نماز جنازہ

نماز جنازہ میں گورنر وزیراعلیٰ آئی جی سمیت دیگر اعلیٰ حکام کی شرکت

شہید ریاض خان کو پولیس حلقوں میں خراج تحسین پیش

پشاور (نمائندہ خصوصی) بڈبیر کے علاقہ شیخان پشاور (نمائندہ خصوصی) محکمہ پولیس میں پولیس [illegible] پولیس حلقے میں شہید ہونے والے ایس ایچ او [illegible] (باقی صفحہ 10 پیج نمبر 4)

اور ریاض چوکی انچارج میر قلم خان اور کانسٹیبل شاکر موقع پر جاں بحق

اہلکاروں کی ایک سرکاری گاڑی میں پیس کا ایک سپاہی میر قلم خان بھی شہید ہو گئے

میں پانچ بھائی اور ان کا ماں بھی شامل ہے جبکہ مفرور فائرنگ کے دوران پولیس اہلکار اور راہگیر خاتون زخمی ہوئی پولیس اور مفروروں کے مابین فائرنگ کا تبادلہ دو گھنٹے تک جاری رہا۔ [illegible] ملاقات میں خوف کی لہر دوڑ گئی پولیس نے مفروروں کے نتیجے سے (باقی صفحہ 10 پیج نمبر 1)

چوکی انچارج

پشاور (نمائندہ خصوصی) تھانہ بڈبیر کے علاقہ شیخان میں پولیس مقابلے میں شہید ہونے والا چوکی انچارج میر قلم خان کو شہید [illegible] سال سے مذکورہ پولیس چوکی میں تعینات تھا [illegible] ورثاء سے رابطہ مطلوب ہے کہ (باقی صفحہ 10 پیج نمبر 2)

میر قلم کی فرض شناسی مشہور تھی

گورنر صوبہ سرحد، وزیراعلیٰ، آئی جی پولیس شہداء کی نماز جنازہ کے بعد [illegible] کے پیش نظر [illegible]

اتصالات افغانستان بات کریں

[illegible]

(20) B (10)

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR
Ph: 091-9210545 Fax: 091-9210927
Email. OSEstabV@gmail.com

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZZETTEE PART-II ORDERS BY THE INSPECTOR GENERAL OF POLICE, KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION

Dated: 5 /04/2017

No 1980 /E-V, **Appointment** As per recommendation of the committee in its meeting held on 02-02-2017 and 14-02-2017 duly approved by the worthy Addl: Inspector General of Police, HQrs, Khyber Pakhtunkhwa, Peshawar that the following Wards of Shuhada of Khyber Pakhtunkhwa, Police are hereby appointed as Junior Clerks (BPS-11) purely on temporary basis in Khyber Pakhtunkhwa, Police with effect from the date they actually report for duty at their places of posting subject to the Medical Fitness, verification of Character/Antecedents by Special Branch Khyber Pakhtunkhwa, Domicile and testimonials by the concerned University and Board etc.

1. **The terms and condition of their services will be as under: -**

i.	A certificate shall be obtained from the Shuhada Wards that they would not demand any other post against Shuhada Quota due to availing the benefit through appointment as Junior Clerk against Shuhada Quota.
ii.	Their character antecedents, degrees, documents and succession certificates will be scrutinized and verified by the committee headed by DPO of the concerned District & detail report would be submitted to CPO in this behalf.
iii.	The enlisted Wards of Shuhada will be kept on one year probationer period from the date of appointment. In the Ist term of probation period spanning over 03 months a private teacher will be hired to tutor them in basic english reading and writing and paid from welfare fund. In 2nd term of 03-months basic computer courses i.e. Microsoft Word Office and typing etc will be taught to them at School of Information Technology Peshawar. In the 3rd term of 02-monhts a course about office related procedure will be arranged for the enlistees. In the fourth term of 04-months they will be attached with branches in allocated Districts/Units. The enlisted Wards will have to qualify the courses at the end of each term failing which their services could be terminated. Assessment of each enlistee at the end of the each term will be carried out by committee comprising of DIG/HQrs:, AIG/Establishment, Director IT, and Registrar CPO & report to that effect will be submitted to Addl: IGP/HQrs:.

2. **Their posting order will be issued separately.**

SR. NO	NAME/ FATHER NAME WITH FULL PARTICULARS
1.	Wajid Ali s/o Shaheed HC Javed Khan r/o Kacha Ghari, Ghari Mali Khel, Badaber, District Peshawar

2.	Sarfaraz Khan s/o Muhammad Humayun b/o Shaheed Falak Niaz r/o Vill: Katar, Baksni Pull, Charsadda Road, District Peshawar
3.	Syed Zahid Shah s/o Shaheed FC Zahir Shah r/o Post Office Nahqi, Nachapa Payan, District Peshawar
4.	Muhammad Bilal s/o Shaheed SI Gohar Zaman r/o Moh: Qambar Khel, Urmer Payan, District Peshawar
5.	Alamdar Hussain s/o Shaheed Mukhtiar Hussain r/o Baghecha Dheri, District Mardan
6.	Zahir Gul s/o Lal Zada b/o Shaheed Daud Jan r/o Nando Khel, Barazi, Teh: Tangi, Distt: Charsadda
7.	Muhammad Yasir s/o Shaheed FC Muhammad Nasir r/o Neher Ghara, Ahmad Abad, Teh: Tangi, Distt: Charsadda
8.	Syed Mohsin Ihsan s/o Shaheed FC Ihsan Ullah r/o Present Address: Phase 6, House No. 133, Street No. 04, Sector F/10 Hayat Abad Peshawar Permanent Address: Kanday Bala, Mahzara, Post Office Haji Zai, Shabqadar, District Charsadda
9.	Inam Ullah s/o Shaheed FC Shakir Ullah No.973/CCP r/o Vill: Tarkha, P.O Akbar Pura, Teh: Pabbi, Distt: Nowshera
10.	Adnan Khan s/o Shaheed FC Fazal Malik No. 957 r/o Badawal, Post Office Totakan, Tehsil Batkhela, District Malakand
11.	Muhammad Ilyas s/o Amir Muqam b/o Shaheed FC Amir Hatam No. 898 r/o Vill: Islam Pur Babozai, Post Office Saidu Sharif District Swat
12.	Perviz Khan s/o Shaheed FC Jehan Zeb Khan r/o Post Office Bandagai Talash, Teh: Timergara, Distt: Lower Dir
13.	Fawad Ali s/o Shaheed DFC Khuda Dost No. 1160 r/o Mohallah Usman Khel, Qambar Khel ,Post Office Rahim Abad, Tehsil Babozai, Distt: Swat
14.	Amir Khan s/o Shaheed SI Muhammad Farid No. 313/H r/o Karmang Tarla, Post Office Kotli Bala, Teh: & Distt: Mansehra
15.	Mazhar Iqbal s/o Shaheed Resham Gul r/o Vill: Tolanj Jadeed, Post Office Gumbat, Distt: Kohat
16.	Safi Ullah s/o Tahir Khan r/o Mohallah Zamzanri, Post Office Dhoda Sharif, Distt: Kohat
17.	Muhammad Kashif Iqbal s/o Shaheed ASI Murshed Ali r/o Vill: Adin Shah, Tehsil Takhti Nusrati, District Karak
18.	Amir khan s/o Zar Gul Khan b/o Shaheed FC Naseer Ullah Khan r/o Purana Azeem Kalla, Khandar Khan Khel, P.O Kotka Muhammad Khan, District Bannu.
19.	Nisar Khan s/o Noor Zali Khan b/o Shaheed Constable Nazar Ali No. 2164 r/o Sarfaraz Khan Sarai, Haji Mardan District Bannu.
20.	Imran Ullah s/o Saad-ud-Din b/o Shaheed FC Naseer ud Din 7806 Vill: Abdul Khel, Teh: Pahar Pur, Distt: Dera Ismail Khan
21.	Saif-ur-Rehman s/o Shaheed Hafiz Muhammad Bakhsh r/o Moh: Farooqia, Muryali Dera Ismail Khan
22.	Muhammad Sohail Abbas s/o Shaheed SI Murid Akbar r/o Moh: Sultania, Teh: Pahar Pur, Distt: Dera Ismail Khan
23.	Umar Saeed s/o Mir Aslam b/o Shaheed Khalid Saeed r/o Vill: Kaga Wala, Rehman Abad, Post Office Badaber, Opposite Mashal CNG, Kohat Road District Peshawar
24.	FC Hazrat Bilal No. 147 s/o Shaheed SI Zarnoosh Khan r/o But Seri, Shahbaz Ghari District Mardan
25.	Abdul Haseeb s/o Shaheed ASI Abdul Qayum Khan r/o Moh: Neher Abad, Post Office Mayyar, District Mardan
26.	Tauheed Khan s/o Shaheed HC Muhammad Saeed r/o Vill: Dalazak Mohallah Shalam Khel, Post Office & Tehsil Shabqadar, Distt: Charsadda
27.	Hamid Ullah s/o Yousaf Khan b/o Shaheed Hidayat Ullah r/o Vill: Shah Hassan Khel, Teh: Pahar Pur, Distt: Dera Ismail Khan
28.	FC Adnan Shahid s/o Madad khan r/o Vill: Ahmad Khel, Moh: Mali Khel Distt: Peshawar

29.	Waseem Khan s/o Shaheed FC Muhammad Zakran r/o Vill: Bada Mir Abbas, Mandan, District Bannu
30.	Muhammad Suleman Saeed s/o Shaheed Saeed Ahmed r/o House No. 220 Qari Abad Street No. 02, Beron Yakatoot, , District Peshawar
31.	Aamir Zafar s/o Zafarullah b/o Shabir Ahmed r/o Vill: Nishtar Abad, House No. 11/43, Street No. 2B/4, Mohallah Islamabad, Peshawar
32.	Kabir Khan Class-IV s/o Bashir Khan b/o Shaheed Shabir Khan r/o Vill: Musazai, Mohallah Bazid Khel, District Peshawar
33.	Ghulam Nabi s/o Habib-ur-Rehman b/o Shaheed Muhammad Jan No. 1599 r/o Mohallah Ibrahimzai, Kulachi, District D.I.Khan.
34.	Inam Ullah s/o Karim Dad Khan b/o Shaheed FC Falak Naz r/o Daulat Khel, P.O Isak Khel, District Lakki Marwat.
35.	Shahzad Ahmad s/o Shaheed Constable Shams-ul-Haq No. 364 r/o Phulkari Debgran, Tehsil & District Mansehra.

3. Age of candidate at Sr. No. 19 is hereby condoned by 06 years and 08 months as per policy/guideline contained in Govt: Notification No. SOE-III (E& AD)2-1/2007, dated 09.12.2010.

(DR. MASOOD SALEEM)
DIG/HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

No.1981-2050 /E-V, Dated Peshawar the 5 /04/2017

Copy of above is forwarded to the following for information and to inform the entistee of your respective Districts/Units accordingly:

- Addl: Inspectors General of Police, Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspectors General of Police, HQrs: CTD, Traffic, Tele-Communication, Khyber Pakhtunkhwa, Peshawar.
- Commandant, Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.
- Capital City Police Officer, Peshawar.
- All Regional Police Officers in Khyber Pakhtunkhwa.
- Assistant Inspector General of Police/Legal, CPO, Peshawar.
- Secretary Police Welfare, Trust, Khyber
- All District Police Officers, in Khyber Pakhtunkhwa.
- All District Accounts Officer, in Khyber Pakhtunkhwa.
- Registrar, Central Police Office, Peshawar.
- Supdt: Secret, E-II, Central Police Office, Peshawar.
- Accountant, Central Police Office Peshawar.
- Incharge Central Registry Cell, CPO, Peshawar.

INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR
Ph: 091-9210545 Fax: 091-9210927
E-Mail: - OSEstabV@gmail.com

No 2661 /E-V

Dated Peshawar 10/5 May, 2017

ORDER

On appointment as Junior Clerks against Shuhada Wards vide Notification No. 1980-2050/E-V, dated 05.04.2017 the following thirty two (32) Junior Clerks are hereby posted in the offices/units as noted against their names with immediate effect until further orders.

However, they will perform their duties at CPO for one year probationer period from the date of their appointment as decided in the meeting held on 02.02.2017 & 14.02.2017 by the competent authority:-

SR. NO	NAME & FATHER NAME	HOME DISTRICT	DATE OF ARRIVAL	PLACE OF POSTING
1.	Wajid Ali s/o Shaheed HC Javed Khan	Peshawar	10.04.2017	Special Branch
2.	Syed Zahid Shah s/o Shaheed FC Zahir Shah	Peshawar	12.04.2017	Special Branch
3.	Muhammad Bilal s/o Shaheed SI Gohar Zaman	Peshawar	10.04.2017	Special Branch
4.	Alamdar Hussain s/o Shaheed Mukhtiar Hussain	Mardan	07.04.2017	SSP/Traffic Peshawar
5.	Zahir Gul s/o Lal Zada b/o Shaheed Daud Jan	Charsadda	14.04.2017	SSP/Traffic Peshawar
6.	Muhammad Yasir s/o Shaheed FC Muhammad Nasir	Charsadda	14.04.2017	SSP/Traffic Peshawar
7.	Syed Mohsin Ihsan s/o Shaheed FC Ihsan Ullah	Charsadda (presently in Peshawar)	07.04.2017	CTD
8.	Inam Ullah s/o Shaheed FC Shakir Ullah No.973/CCP	Nowshera	11.04.2017	SSP/Traffic Peshawar
9.	Muhammad Ilyas s/o Amir Muqam b/o Shaheed FC Amir Hatam No. 898	Swat	14.04.2017	Malakand Region
10.	Perviz Khan s/o Shaheed FC Jehan Zeb	Lower Dir	14.04.2017	Malakand Region
11.	Fawad Ali s/o Shaheed DFC Khuda Dost No. 1160 r/o Mohallah Usman	Swat	14.04.2017	Malakand Region
12.	Mazhar Iqbal s/o Shaheed Resham	Kohat	17.04.2017	Kohat Region
13.	Safi Ullah s/o Tahir Khan	Kohat	12.04.2017	Kohat Region

14.	Muhammad Kashif Iqbal s/o Shaheed ASI Murshed Ali	Karak	20.04.2017	Kohat Region
15.	Amir khan s/o Zar Gul Khan b/o Shaheed FC Naseer Ullah Khan	Bannu	20.04.2017	Kohat Region
16.	Nisar Khan s/o Noor Zali Khan b/o Shaheed Constable Nazar Ali No. 2164	Bannu	20.04.2017	PTC Hangu
17.	Imran Ullah s/o Saad-ud-Din b/o Shaheed FC Naseer ud Din 7806	D.I.Khan	20.04.2017	SSP/Traffic Peshawar
18.	Saif-ur-Rehman s/o Shaheed Hafiz Muhammad Bakhsh	D.I.Khan	20.04.2017	SSP/Traffic Peshawar
19.	Muhammad Sohail Abbas s/o Shaheed SI Murid Akbar	D.I.Khan	11.04.2017	SSP/Traffic Peshawar
20.	Umar Saeed s/o Mir Aslam	Peshawar	12.04.2017	CCP Peshawar
21.	FC Hazrat Bilal No. 147 s/o Shaheed SI Zarnoosh Khan	Mardan	28.04.2017	Mardan Region
22.	Abdul Haseeb s/o Shaheed ASI Abdul Qayum Khan	Mardan	25.04.2017	Mardan Region
23.	Tauheed Khan s/o Shaheed IHC Muhammad Saeed	Charsadda	10.04.2017	SSP/Traffic Peshawar
24.	Hamid Ullah s/o Yousaf Khan	D.I.Khan	20.04.2017	SSP/Traffic Peshawar
25.	FC Adnan Shahid s/o Madad Khan	Peshawar	19.04.2017	CCP/Peshawar
26.	Waseem Khan s/o Shaheed FC Muhammad Zakran	Bannu	20.04.2017	FRP/Kohat
27.	Muhammad Suleman Saeed s/o Shaheed Saeed Ahmed	Peshawar	18.04.2017	CPO
28.	Aamir Zafar s/o Zafarullah b/o Shabir Ahmed	Peshawar	17.04.2017	FRP/HQrs: Peshawar
29.	Kabir Khan Class-IV s/o Bashir Khan b/o Shaheed Shabir Khan	Peshawar	13.04.2017	SSP/Traffic Peshawar
30.	Ghulam Nabi s/o Habib-ur-Rehman	D.I.Khan	20.04.2017	SSP/Traffic Peshawar
31.	Inam Ullah s/o Karim Dad Khan.	Lakki Marwat	24.04.2017	FRP/Kohat
32.	Shahzad Ahmad s/o Shaheed Constable Shams-ul-Haq No. 364	Mansehra	20.04.2017	Hazara Region

Besides, Prior to draw the salaries of the above mentioned Junior Clerks all the concerned District Police Officers/Units are requested to carryout their verification of character & antecedents by Special Branch Khyber Pakhtunkhwa, Peshawar and Academic Testimonial from the concerned Universities/Board of the above named newly appointee accordingly.

Sd/

(MUHAMMAD ALI KHAN) PSP
DIG/HQrs:
For Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar

OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA,
CENTRAL POLICE OFFICE,
PESHAWAR
Ph: 091-9210545 Fax: 091-9210927

SHOW CAUSE NOTICE

WHEREAS, you JUNIOR CLERK INAM ULLAH have deliberately and intentionally absented yourself for 29-days from the Basic Training Program arranged for 32 newly appointed Junior Clerks commenced on 06-06-2017 at Malik Saad Shaheed Police Lines Peshawar till 31-07-2017 without any kind of leave/permission from the Competent Authority. Your such act is quite contrary to the norms of a Disciplined Force. For which you are liable to be taken to task under the purview of mis-conduct as specified in the **Government of Khyber Pakhtunkhwa, Civil Servants (Efficiency and Discipline) Rules-2011.**

2) AND WHEREAS, your such act amounts to gross misconduct as defined in **Government: Servants (Efficiency and Discipline) Rules-2011**, which stands proved and render you liable to be awarded punishment under Section 3 of **Government of Khyber Pakhtunkhwa, Civil Servants Efficiency and Disciplinary, Rules-2011.**

3) NOW THEREFORE, I, ARIF SHAHBAZ KHAN Asstt: Inspector General of Police, Establishment CPO, Peshawar, as Competent Authority has tentatively decided to impose upon you, any one or more penalties including the penalty of "dismissal from Service" under **Section 4 of Government Khyber Pakhtunkhwa, Civil Servants (Efficiency and Discipline) Rules-2011.**

4) YOU ARE, THEREFORE, required to show cause within seven days of the receipt of this Show Cause Notice, as to why the aforesaid penalty should not be imposed upon you as mentioned in the ibid rules on your such mis-conduct, failing which it shall be presumed that you have no defence to offer and an ex-parte action shall be taken against you. Meanwhile also intimate that whether you desire to be heard in person or otherwise.

(Arif Shahbaz Khan) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

D (15)

OFFICE OF THE INSPECTOR GENERAL OF POLICE
KYBER PAKHTUNKHWA, CENTRAL POLICE OFFICE PESHAWAR

Ph: 091-9210545 Fax: 091-9210927 Email. OSEstabV@gmail.com

No. 2818-26 /E-V, dated, Peshawar the, 31/5/ 2018. (16)

ORDER.

This order will dispose off the enquiry proceedings against Junior Clerk Inam Ullah of SSP/Traffic Office Peshawar.

The brief , yet relevant facts of the case are that the above official deliberately absented himself from lawfull duty for 29-days from the Basic Training program arranged for 32 newly appointed Junior Clerks commenced on 06.06.2017 at Malik Saad Shaheed Police Lines Peshawar till 31.07.2017 without any kind of leave/permission from the Competent Authority. In this regard Showcause Notice was issued and reply of which is still awaited from his side. Reportedly, he again absented himself from 14.08.2017 till date.

Consequently departmental enquiry proceedings was initiated against him.Showcause Notice was served upon him through DPO/Nowshehra, SP/Admin and DSP/PAS CPO were nominated as enquiry officers.The enquiry committee directed him time and again through phone and as well as in written to appear before the enquiry committee, but neither he appeared before the enquiry committee nor submitted any solid reasons in his defence.Hence, the enquiry committee recommended him for major punishment of Dismissal from Service.Similarly, Final Showcause Notice was also served opon him on 14.05.2018.The DPO/Nowshehra has returned photocopy of the same duly signed by the delinquent official, but he totally failed to submit any plausible explanation in rebuttal of the charges.

In view of the above and as per recommendation of the enquiry committee, the available material on record, I IRFAN ULLAH KHAN PSP, AIG/Establishment, Khyber Pakhtunkhwa Peshawar has no option except to take Ex-parte action against Junior Clerk Inam Ullah of his dismissal from the service under Khyber Pakhtunkhwa Government Civil Servants (Efficiency and Discipline) Rules-2011 with forfeiture of the salary for the period he remained absent to be deposited in Government Exchequer , with immediate effect.

Order announced.

OFFICE OF THE SSP TRAFFIC PESH
Diary No. 1953
Dated 31/5/2018

(IRFAN ULLAH KHAN) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,Peshawar.

Endst: No. & date even.

Copy forwarded to the: -

- Addl: Inspector General of Police HQrs: Khyber Pakhtunkhwa, Peshawar.
- Accountant General Khyber Pakhtunkhwa.
- Deputy Inspector General of Police HQrs,Khyber Pakhtunkhwa,Peshawar.
- Senior Superintendent of Police Traffic Peshawar.
- PA to Assistant Inspector General of Police: Estt: CPO Peshawar.
- Registrar, CPO Peshawar.
- Office Supdtt: Secret and CP Branch, CPO Peshawar.
- Incharge-Central Registry Cell.

OS/PA

BC/PO/SRC-1

To;

The Honorable Provincial Police Officer (PPO),
Central Police Office, Khyber Pakhtunkhwa, Peshawar.

C 14506/E5C

Subject:- APPEAL FOR RESTORATION OF SERVICE AS JUNIOR CLERK.

Respected Sir,

1. With due reverence, it is humbly stated that my father namely Shaheed FC Shakirullah No.973/CCP (constable) has been martyred during absconders confrontation with police at Baddaber on 03rd April, 2010. After the death of my father I, submitted an application for job in Police Deptt under Shahudaa package. On 5/4/2017 I have been appointed as Junior Clerk (BS-11) vide notification No.1980/E-V and posted to the office of SSP Traffice, Peshawar vide Order No. 2661/E-V dated: 10/5/2017 for onward basic training at Malik Saad Shaheed Police Lines, Peshawar. But I could not regularly attend the office and training session due to my very serious nature of domestic problems as my mother was bed ridden due to chronic disease at that time.

2. Due to my absence from the duty the Police Deptt has issued show cause/charge sheet and on the said allegation an enquiry has been levelled against me.

3. It is also pertinent to mention here that after 4 month of appointment my salary has been started from the month of August. 2017 till May, 2018 through DDO but I could not receive my salary due to verbal reply from account section that my salary has not yet been started. I was in financial crunch even I had no single penny for joining the duty and to pay the rent of house apart of other necessities of life.

4. On the recommendation of enquiry committee, I have been dismissed from the service vide Order No.2818-26/E-V, dated:31/5/2018 but I have not been informed nor any copy of the order is issued in writing to the official concerned (copy enclosed). Sir I am still jobless while my mother is bed ridden and the whole family is dependent on me being guardian of the family.

5. In view of above it is humbly requested that my service may kindly be restored on humanitarian grounds please. I hope that sir, you will consider my appeal sympathetically. My whole family will pray for your long life.

Encls:-
All the relevant documents.

1128
22/08/23

Yours most obedient

Inamullah

(Inamullah S/o Shaheed FC Shakirullah No.973/CCP)
Ex-Junior Clerk, Police Department, Peshawar.
R/o: Tarkha, Akbar Pura, Tehsil Pabbi, District Nowshera.
Cell No.0315-9477179

E-II.
22/08

18

INSPECTOR GENERAL OF POLICE,
CENTRAL POLICE OFFICE,
KHYBER PAKHTUNKHWA PESHAWAR

No. 2579 **/E-V, dated Peshawar the** 07 / 09 **/2023**

To

The District Police Officer,
Nowshera.

Subject: - **DEPARTMENTAL APPEAL**

Memo:-

It is submitted that Competent Authority has examined & filed the Departmental Appeal of Ex-Junior Clerk Mr. Inam Ullah S/O Shaheed FC Shakir Ullah No.973/CCP R/O Tarkha, Akbar Pura, Tehsil Pabbi District Nowshera, against the penalty of dismissal from service by AIG/Establishment vide Order No. 2818-26/E-V, dated 31.05.2018, being badly Time-Barred.

Please inform the applicant accordingly in this regard.

7/09/23

(AFSAR JAN)
Registrar
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

19

بعدالت جناب خیبر پختونخوا سروس ٹریبونل پشاور

2 منجانب

انعام اللہ بنام سیکرٹری ایجوکیشن

موزخہ _____
مقدمہ _____
دعویٰ _____
جرم _____

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام پشاور کیلئے محمد آیاز خان ایڈووکیٹ محمد خان ایڈووکیٹ
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارعرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر ایں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برامدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھدیا کہ سند رہے۔

Accepted by

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گواہ العبد

بمقام پشاور

انعام اللہ ولد سخاکر اللہ