


Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 1001/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	19.07.2024	<p>As per direction of the Hon'ble Member Judicial the present appeal is fixed for preliminary hearing before Single Bench at Peshawar on 23.07.2024. Parcha Peshi giving to the counsel for the appellant.</p> <p style="text-align: right;"> REGISTRAR</p>

Respected Madam,

It is submitted that the present appeal was returned to counsel for the appellant for removing the deficiencies (Flag-A). Today i.e. 10.07.2024 the learned counsel re-filed the appeal without removing the objection no. 2, 4, 5, 6 & 7.

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

OFFICE ASSISTANT

Hon'ble Member (J).

objections sustain, return to the counsel
for doing the needful with direction to
re-submit it within 07 days. R
11/7/24.

No. 338 / 1054 / 2024 / KPST

Dated: 11/7/24

Resubmitted after completion
fix before S.B. R.


15/7/24.

The appeal of Mr. Muhammad Jamshed received today i.e on 14.06.2024 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 & 4 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- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal are unattested.
- 4- Copy of departmental appeal is not attached with the appeal be placed on it.
- 5- Annexures of the appeal are not in sequence.
- 6- Copy of statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal be placed on it.
- 7- Copies of order dated 06.05.2024 and annexure-B of the appeal are illegible be replaced by legible better one.
- 8- 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. 217 /Inst;/2024/KPST,

Dt. 20/6 /2024.


20/6/24
OFFICE ASISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Shah Faisal Nassapi Adv.
High Court Peshawar.

Remember after completion
09/07/24

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 1001 /2024

Muhammad Jamshid.....Appellant

Versus

Inspector General of Police Khyber Pakhtunkhwa
Peshawar & others.....Respondents

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal with affidavit		1-7
2.	Application for condonation with Affidavit		8-9
3.	Addresses of parties		10
4.	Copy of impugned order dated 18.03.2024	A	11-12
5.	Copy of departmental Appeal alongwith order dated 06.05.2024	B	13-16
6.	Other relevant documents		17
7.	Wakalatnama		18

Through Appellant


Shah Faisal Nasapi
Advocate,
Supreme Court of Pakistan

Dated 14.06.2024

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 1001 /2024

Muhammad Jamshid
Ex-Constable No.7128 of FRP Bannu
R/o Sokari Zabta Khan Bnnu Tehsil & District Bannu

.....APPELLANT

Versus

1. Commandant Frontier Reserve Police, Khyber Pakhtunkhwa Peshawar
2. Deputy Commandant Frontier Reserve Police, Khyber Pakhtunkhwa Peshawar

.....Respondents

**APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974 AGAINST IMPUGNED ORDER DATED
06.05.2024 PASSED BY THE RESPONDENT
NO.1 WHEREBY THE APPEAL OF THE
APPELLANT WAS DISMISSED AGAINST
DISMISSAL FROM SERVICE ORDER DATED
18.03.2024.**

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____ /2024

Muhammad Jamshid
Ex-Constable No.7128 of FRP Bannu
R/o Sokari Zabta Khan Bnnu Tehsil & District Bannu

.....APPELLANT

Versus

1. Inspector General of Police Khyber Pakhtunkhwa Peshawar
2. Commandant Frontier Reserve Police, Khyber Pakhtunkhwa Peshawar
3. Deputy Commandant Frontier Reserve Police, Khyber Pakhtunkhwa Peshawar
4. Superintendent of Police Frontier Reserve Police D.I.Khan.....**Respondents**

**APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974 AGAINST IMPUGNED ORDER DATED
06.05.2024 PASSED BY THE RESPONDENT
NO.1 WHEREBY THE APPEAL OF THE
APPELLANT WAS DISMISSED AGAINST
DISMISSAL FROM SERVICE ORDER DATED
18.03.2024.**

Prayer:

On acceptance of this Service Appeal, the Impugned Order dated 06.05.2024 and 18.03.2024 may kindly be set-aside be declared as null and void and the appellant may kindly be reinstated in service with all back benefits, with such other relief as may deem fit in the circumstances of the case not sked for may also be granted.

Respectfully Sheweth,

Short facts, giving rise to present Service Appeal, are as under:

1. That the appellant is peaceful and law abiding citizen of Pakistan.
2. That the appellant was serving as Constable No.7128 of FRP Bannu Range and performed his duties upto the best of his ability with commitment zeal and zest upto the entire satisfaction of the high-up's.
3. That the respondents on the basis of frivolous, fake allegations without fulfilling the legal and codal requirements have initiated departmental

proceedings against the appellant by appointing an inquiry officer.

4. That the inquiry officer has made statement of allegations but unfortunately the same was not served /communicated to the appellant and unilaterally conducted the alleged inquiry and passed a harsh order of major penalty of dismissal of from service vide order dated 18.03.2024. **(Copy of impugned order dated 18.03.2024 is attached as annexure "A")**.
5. That appellant filed departmental appeal before the respondent No.2 which was dismissed on 06.05.2024. **(Copy of departmental Appeal alongwith order dated 06.05.2024 are attached as annexure "B")**.
6. That the appellant is bitterly aggrieved from the impugned orders dated 06.05.2024 and 18.03.2024, hence this Service Appeal on the following amongst other grounds: -

GROUND S:

- A. That, the Impugned Orders passed by the respondents are illegal, unlawful, void and

unlawful hence are liable to be set aside and declare as null and void.

- B. That, the same are against the principles of Natural Justice as no opportunity of hearing has been provided to the appellant and appellant is condemned unheard.
- C. That no property inquiry has been conducted nor any material regarding the alleged allegations are collected and no evidence of experts has been recorded nor any statement of the general public and of police officials have been brought on the record.
- D. That no lawful procedure has been adopted while conducting the alleged inquiry
- E. That nothing is available on record and the major punishment has been awarded without bringing any evidence or material what to say of solid evidence against the appellant to connect with the alleged allegations.
- F. That the inquiry officer has not conducted the alleged inquiry according to the statements of

allegations and the worthy Deputy Commandant/respondent No.3 has passed the order based on the alleged departmental inquiry on the basis of surmises and conjectures beyond the scope of law.

G. That regarding the involvement of appellant in the alleged discriminatory uploading of tiktoks and other materials on social media no identification of the mobile number has been brought on the record nor the number mentioned in the proceedings has been verified from the concerned registration authority and baseless allegations were leveled against the appellant and was awarded major punishment of dismissal from service which is very harsh, illegal unlawful and beyond the norms of law and justice.

H. That the impugned order is based on surmises and conjecture and mere on bold allegation the appellant is deprive from his fundamental rights provide to the appellant nor the order appeal was served or communicated to the appellant.

- I. That any other ground will be raised at the time of arguments with the prior permission of this Hon'ble Tribunal.

It is therefore requested that on acceptance of this Service Appeal, the Impugned Order dated 06.05.2024 and 18.03.2024 may kindly be set-aside be declared as null and void and the appellant may kindly be reinstated in service with all back benefits, with such other relief as may deem fit in the circumstances of the case no asked for may also be granted.



Appellant

Through



Shah Faisal Nasapi
Advocate,
Supreme Court of Pakistan

Dated 14.06.2024

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____ /2024

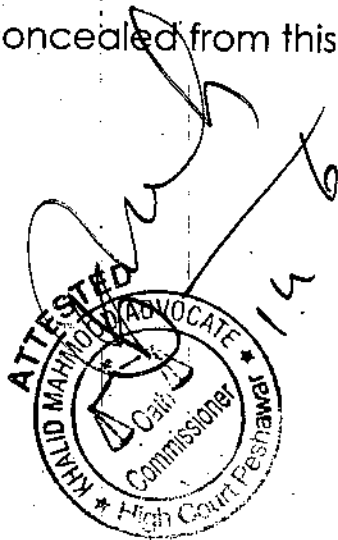
Muhammad Jamshid.....Appellant

Versus

Inspector General of Police Khyber Pakhtunkhwa
Peshawar & others.....**Respondents**

AFFIDAVIT

I, Muhammad Jamshid, Ex-Constable No.7128 of FRP Bannu R/o Sokari Zabta Khan Bnnu Tehsil & District Bannu, do hereby solemnly affirm and declare 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 Court.



(Handwritten signature)

DEPONENT

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____ /2024

Muhammad Jamshid.....Appellant

Versus

Inspector General of Police Khyber Pakhtunkhwa
Peshawar & others.....Respondents

APPLICATION FOR CONDONATION OF
DELAY IF ANY IN FILING THE INSTANT
SERVICE APPEAL

Respectfully Sheweth,

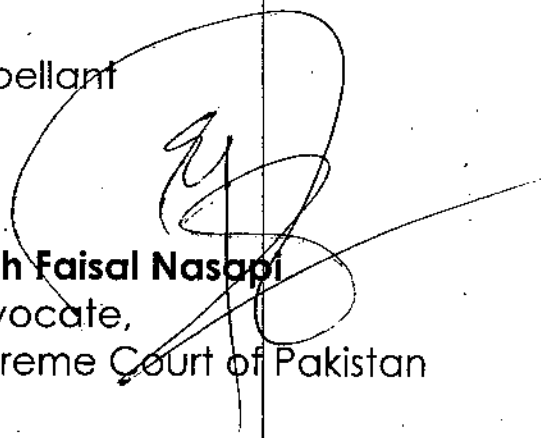
1. That the accompanied appeal alongwith the instant application is being filed before this Hon'ble Tribunal the grounds of which may kindly be considered as integral party of this application
2. That the appellant has preferred departmental appeal within time however the department /appellate authority has no communicated the impugned order dated 26.05.2024 nor attested copy of the same is provided to the appellant within period of limitation.
3. That delay in approaching this Tribunal was due to above mentioned reason which was neither intentional, nor was under control of the petitioner.

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4. That law also favour adjudication on merits and technicalities of any sort must always be ignored while reaching a just and fair disposal of any lis.
5. That for proper disposal of the accompanying appeal on its merits, the condonation of delay is indispensable and is in according to natural justice.

It is, therefore, most humbly prayed that on acceptance of the instant application, the delay in filing the accompanying appeal may graciously be condoned and the accompanying appeal may very graciously be decided on its merits.

Appellant
Through

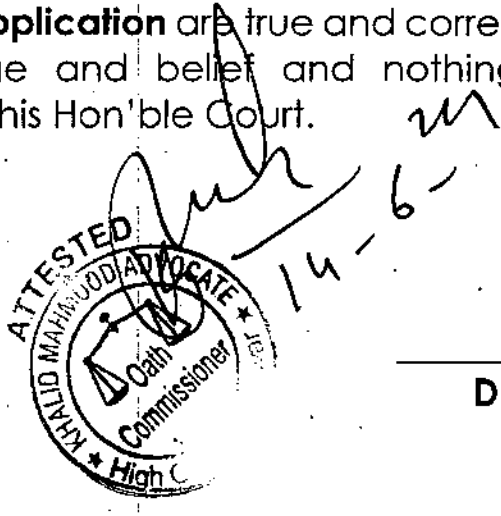


Shah Faisal Nasapi
Advocate,
Supreme Court of Pakistan

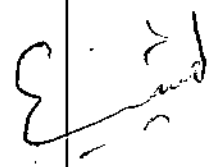
Dated 14.06.2024

AFFIDAVIT

I, Muhammad Jamshid, Ex-Constable No.7128 of FRP Bannu R/o Sokari Zabta Khan Bnnu Tehsil & District Bannu, do hereby solemnly affirm and declare that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



14-6-24



DEPONENT

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____ /2024

Muhammad Jamshid.....Appellant

Versus

Commandant Frontier Reserve Police &
others.....Respondents

ADDRESSES OF PARTIES

APPELLANT

Muhammad Jamshid
Ex-Constable No.7128 of FRP Bannu
R/o Sokari Zabta Khan Bnnu Tehsil & District Bannu

RESPONDENTS

1. Commandant Frontier Reserve Police, Khyber
Pakhtunkhwa Peshawar
2. Deputy Commandant Frontier Reserve Police,
Khyber Pakhtunkhwa Peshawar

Appellant

Through

Dated 14.06.2024

Shah Faisal Nasapi
Advocate,
Supreme Court of Pakistan

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

Service Appeal No. _____ /2024

Muhammad Jamshid.....Appellant

Versus

Inspector General of Police Khyber Pakhtunkhwa
Peshawar & others.....**Respondents**

ADDRESSES OF PARTIES

APPELLANT

Muhammad Jamshid
Ex-Constable No.7128 of FRP Bannu
R/o Sokari Zabta Khan Bnnu Tehsil & District Bannu

RESPONDENTS

1. Inspector General of Police Khyber Pakhtunkhwa Peshawar
2. Commandant Frontier Reserve Police, Khyber Pakhtunkhwa Peshawar
3. Deputy Commandant Frontier Reserve Police, Khyber Pakhtunkhwa Peshawar
4. Superintendent of Police Frontier Reserve Police D.I.Khan

Through Appellant


Shah Faisal Nasapi
Advocate,
Supreme Court of Pakistan

Dated 14.06.2024

ORDER

This order will dispose of the departmental appeal preferred by ex-constable Muhammad Jamshid No. 7128 of FRP Bannu Range, against the order of competent authority, wherein he was awarded major punishment of dismissal from service on 18.03.2024.

Am
A P
Brief facts of the case are that he while posted at FRP Bannu Range uploaded/shared video and audio messages on social media from his account against the rules regulations and discipline of Police Force vis-a-vis in violation of Government decisions and Policies.

In this regard he was proceeded against proper departmentally as he was issued Charge Sheet alongwith Summary of Allegations and DSP Sartaj Khan FRP Bannu Range was appointed as Enquiry Officer to probe into the matter.

After completion of enquiry, the Enquiry Officer submitted his findings report, wherein he reported that the delinquent constable is being a member of disciplined force deliberately uploaded/whirled video and audio messages on social media from his account against the rules regulations of Government, which he stimulated the junior rank police official for mutiny and agitation in the force. Besides during the pendency of enquiry the District health Officer Bannu has also submitted a complaint against the above named constable vide his office Memo No. 7551-55, dated 13.12.2023, wherein he stated that the said constable is involved in campaigning against the Government Program with regard to prevention of Polio disease. The Enquiry Officer further reported that the delinquent officer is a habitual absentee as perusal of service record reveals that during the service he remained absent from lawful duty on different occasions for a long period of 489 days, for which he awarded several punishments. Enquiry Officer further added that at earlier i.e. in the year of 2023 he was also awarded major punishment of dismissal from service on account of instigating or police officials on social media for protest demonstration against the High ups. Hence, the Enquiry Officer found him guilty of the charges leveled against him and recommended major punishment of dismissal from service.

It is worth to mention here that in the meanwhile the Deputy Commandant SSU (CPEC) has also preferred an complaint against constable Jamshid No. 7126 of FRP Bannu Range, through official letter No. 424/PA, dated 05.03.2024, wherein he reported that constable Muneeb No. 1098 of SSR (CEPEC) is placed under enquiry and confined to Quarter Guard on the allegations that he repeatedly shared video clips against the Police department on social media in violation of Government Rules. However, in this connection constable Jamshid No. 7128 of FRP Bannu Range has incited the officials of whole Police Force for agitation against the department for releasing of constable Muneeb No. 1098 of SSU (CPEC) and threatened that in case of non release of constable, the option of protest demonstration would be taken. The Deputy Commandant SSU (CPEC) has requested that departmental action may be initiated against the above named constable under the existent law rules.

Upon the findings of Enquiry Officer he was issued Final Show Cause Notice and served upon him accordingly, which he replied, but his reply was found unsatisfactory. He was called in orderly room for personal hearing, but he did not turn up.

In view of the above narrated facts and other material available on record, he was awarded major punishment of dismissal from service vide Order Endst; No. 2885/PA, dated 18.03.2024.

Feeling aggrieved against the impugned order of the competent authority the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 30.04.2024.

Along the course of personal hearing, the applicant failed to present any justification with regard to his innocence. Perusal of enquiry file and other material available on record the applicant (constable Jamshid No. 7128 of FRP Bannu Range) is

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inefficient, indiscipline and irresponsible police officer as being a member of disciplined force he deliberately disregarded the discipline and conduct of the Police Force. As he obviously violated the Khyber Pakhtunkhwa, Government Servant (Conduct) Rules 1987 and instructions issued vide Government notification No. SO(Police)/E&A/2-16/2022, dated 15.08.2023, which refrained a Government Servant/Civil Servant from participating in WhatsApp and other social media platforms. The charges levelled against the delinquent officer have been fully established during the course of enquiry. Hence, the act of said defaulter officer has brought a bad name for the whole department and has also misused his official status and in such circumstances he did not deserve to be taken lenient view. Therefore, there doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above and the facts that the applicant intentionally failed to mend his ways, despite being given the chance of reinstatement in service after his earlier dismissal. Therefore, I, **Commandant FRP** Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal hence, the same is rejected/filed being meritless.

Order Announced.

Commandant

Frontier Reserve Police

Khyber Pakhtunkhwa, Peshawar.

No 4919 SI Legal, dated Peshawar the 6/5/2024.

Copy of above is forwarded for information and necessary action to

the:-

- 1. SP FRP Bannu Range, Bannu. His Service record alongwith D-file sent herewith.
- 2. Ex-constable Jamshid No. 7128 S/o Gul Robaz Khan R/o Sokari Zabta Khan District Bannu.

SRC
For information and action

470

10/05/24

Attested

[Signature]
Superintendent of Police
FRP/Bannu

Superintendent of Police
FRP/Bannu

10/5/24

1912-13 = 745
Nob. = 0330-97446
1911-12 = 562451

3

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13

(14) 2

ORDER

This order will dispose of the Departmental Inquiry, conducted against Constable Jamshid No. 7128 of FRP Bannu Range;

Brief facts of the case are that he will posted at FRP Bannu Range Uploaded/shared video and audio messages on social media from his account vide: mobile number i.e. 0346-2169803 against the rules regulations and discipline of police force vis-à-vis in violation of Government decisions and policies.

In this regard he was proceeded against proper departmentally as he was issued charge sheet alongwith summary of allegation and DSP Sartaj Khan FRP Bannu Range was appointed as Enquiry officer to probe into the matter.

After completion of enquiry, the enquiry officer submitted his findings report, wherein he reported that the delinquent constable is being a member of disciplined force deliberately uploaded/ whirled video and audio messages on social media from his account against the rules regulations of Police Department and trying to stimulate the junior rank police officials for mutiny and agitation in the force. Moreover, during course of enquiry, the District Health Officer of Bannu Hospital has also submitted a complaint against Constable Jamshaid No. 7128 vide his office Memo No. 7551-55 dated 13.12.2023 wherein he stated that the said Constable is involved in campaigning against the Government Program with regard to prevention of Polio disease on social media. The Enquiry Officer further reported that the delinquent officer is a habitual absentee as perusal of service record reveals that during the service he remained absent from lawful duty on different occasions for a long period of 489 day, for which he awarded several punishments. Besides, earlier he was also awarded Major Punishment of dismissal from service on account of instigating of Police Officials on social media for protest demonstration against the high ups. Hence, the Enquiry Officer found him guilty of the charges leveled against him and recommended for Major Punishment of dismissal from service.

It is worth mention here that in the meanwhile the Deputy Commandant SSU (CPEC) has preferred an complaint against Constable Jamshid No. 7128 of FRP Bannu Range, vide his office Memo No. 424/PA dated 09.03.2024 and Memo No. 433/PA dated 0803.2024 wherein he reported that the above named accused constable has shared a voice audio messages on social media from his account vide mobile No. 0346-2169803 which he openly blamed that Special Branch police of District Swabi has arrested and imprisoned

ORDER

This order will dispose of the Departmental Inquiry, conducted against **Constable Jamshid No. 7128** of FRP Bannu Range:

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15

Constable Muneed No. 1098 of Platoon No. 21 of SSU (CPEC). However, in this regard the Deputy Commandant SSU (CPEC) as disclosed that in fact constable Muneed No. 1098 is placed under enquiry and confined to Quarter Guard on the allegation that he repeatedly shared video clips against the Police Department on social media in violation of Government Rules and Policies and in this connection constable Jamshid No. 7128 of FRP Bannu Range has incited the officials of whole Police Force for agitation against the department for releasing of constable Muneed No. 1098 and threatened that in case of non release of said constable hence the option of protest demonstration would be adopted against the high-ups. Etc. In this regard the Deputy Commandant CPEC has requested that departmental action may be initiated against the above named constable under the existent law/rules.

On receipt of the findings, he was issued final show cause notice and served upon him accordingly. Which he replied, but his reply was found unsatisfactory. He was called in orderly room for personal hearing, but he did not turn up.

After going through the enquiry file and other material available on record, it has been come crystal clear that constable Jamshid No. 7128 of FRP Bannu Range is found an inefficient, indisciplined and irresponsible police officer as being a member of disciplined force he deliberately disregarded the discipline and conduct of the police force. Hence, he committed with a gross misconduct as he obviously violated the Khyber Pakhtunkhwa Government Servant (Conduct) Rules 1987 and instruction issued vide notification No SO (police)E&AD/2-10/2022 dated 15.08.2023, which refrained Government Servant/Civil servant from participating in Whatsapp and other social media platforms, which he committed a gross misconduct.

The charges leveled against the delinquent officer have fully been established during course of enquiry. The opportunity of personal hearing was also given to the accused officer but he showed reluctance and did not come to the office. The act of said default officer has brought a bad name for the whole police department and has also misused his official status and in such circumstance, he does not deserve to be taken lenient view.

In the light of the stated facts and circumstances narrated above, I Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar being a competent authority empowered under Section 5 (3-c), (5) came to the conclusion after

Legible Copy Page-15

Table Muneeb No. 1098 of Platoon No. 21 of SSU (CPEC). However, in this regard the Deputy Commandant SSU (CPEC) as disclosed that in fact constable Juneed No 1095 is placed under enquiry and confined to Quarter Guard on the allegation that he repeatedly shared video clips against the Police Department on social media in violation of Government Rules and Policies and in this connection constable Jamshid No. 7128 of FRP Bannu Range has incited the officials of whole Police Force for agitation against the department for releasing of table Muneeb No.1098 and threatened that in case of non-release of said stable hence the option of protest demonstration would be adopted against the High-ups. In this regard the Deputy Commandant CPEC has requested that departmental action may be initiated against the above named constable under the existent law/rules.

On receipt of the findings, he was issued final show cause notice and served upon accordingly. Which he replied, but his reply was found unsatisfactory. He was called in orderly room for personal hearing, but he did not turn up.

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The charges levelled against the delinquent officer have fully been established during course of enquiry. The opportunity of personal of hearing was also given to the accused officer but he showed reluctance and did not come to the office. The act of said default officer has brought a bad name for the whole Police Department and has also misused his official status and in such circumstances, he does not deserve to be taken lenient view.

In light of the stated facts and circumstances narrated above. I Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar being a competent authority empowered under Section 5 (3-c), (5) came to the conclusion after

16
ating the entire evidence against the alleged official, which he found efficient and guilty of misconduct within the meaning of Section-3 (a&b) of Police Disciplinary Rules, 1975 (as amended in 2014) awarded him the Major Punishment of Dismissal from Service with immediate effect.

Order announced



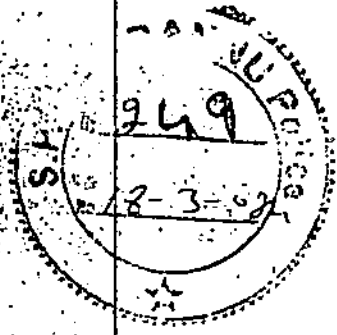
Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa,
Peshawar.


No. 2885 /PA D.C. dated Peshawar the 18 / 3 /2024.

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


1. Deputy Superintendent of Police Bannu Range

Reader
for information & n/action




Superintendent of Police
FRP/Bannu
28/3/24

Alleged


Superintendent of Police
FRP/Bannu

Legible Copy Page-16

..... The entire evidence against the alleged officials, which he found efficient and guilty of misconduct wherein the meaning of Section-3 (a&b) of Police Disciplinary Rules 1975 (as amended in 2014) Awarded him the Major Punishment of Dismissal from Service with immediate effect.

Order announced

Sd/-
Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa
Peshawar

No. 2885/ /PA D.C, dated Peshawar the 18/03/2024.

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

1. Deputy Superintendent of Police Bannu Range.

CHARGE SHEET

I, Superintendent of Police of FRP DIKhan as competent authority, am of the

opinion that you Constable Janshal No. 2232/FRP of FRP Bannu have

committed the following acts/omission as defined in Rule 2 (iii) of Police Rules

1975

It has come into the notice that you are using to upload Tik Tok videos

regularly and now-a-days started campaign against Police officials on social

media as well as on different Whatsapp groups. This act leads to gross

misconduct on your part and punishable under the Police Rules.

It is a gross "Misconduct" on your part as defined in Rule 2 (iii) of Police Rules

1975 and has rendered yourself liable to be proceeded against departmentally.

By reason of the above, you seem to be guilty as sufficient materials is placed

before the undersigned; therefore, it is decided to proceed against you in general

police proceeding.

You are therefore, required to submit your written reply within 07 days of the

receipt of this charges sheet to the Enquiry Officer

Your written reply, if any, should reach the Enquiry Officer within specific

period, failing which it shall be presumed that you have no defense to offer and

in that case ex-parte action shall follow against you.

Intimate as to whether you desire to be heard in person or not?

A statement of allegation is enclosed

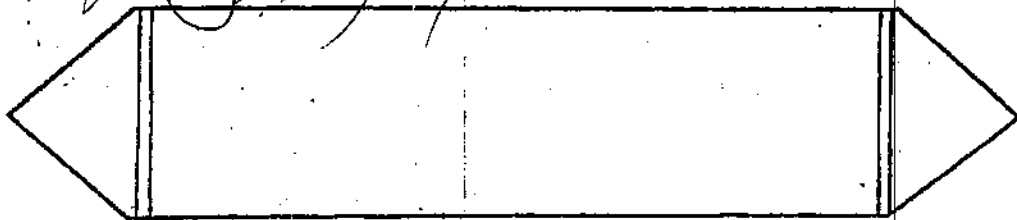
~~Superintendent of Police, FRP
DIKhan Rangar DIKhan~~

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dated 19/11

2023

بعدالت



2 مخانبیا اسلام آباد

محمد سعید نسیر

موزعہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دیکھ کر روائی متعلقہ
آن مقام کے لئے سہ ماہی کے مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کُل کارروائی کا کامل اختیار ہوگا۔ نیز
دیکھ صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلاف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کُل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب 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 لکھ دیا کہ سنہ ہے۔

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المرقوم

بمقام
Shah Paul Olayal
Asc
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