


# FORM OF ORDER SHEET

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

**Appeal No. 1688/2024**


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01 /10/2024	<p>The appeal of Mr. Sikandar Ali resubmitted today by Mr. Bilal uddin Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 07.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  REGISTRAR</p>

The appeal of Mr. Sikandar Ali received today i.e on 11.09.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓ 1 ✓ Memorandum of appeal is not signed by the appellant.
- ✓ 2 ✓ Address of appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3 ✓ Affidavit is not attested by the Oath Commissioner.
- 4 ✓ Annexures of the appeal are unattested.
- ✓ 5 ✓ In the memo of appeal words petitioner is used but there exist no provision in KP Service Tribunal rules/Act 1974 for using the word petitioner.
- 6 ✓ Copy of dismissal order mentioned in para-10 of the memo of appeal is not attached with the appeal be placed on it.
- 7 ✓ Copy of impugned order dated 11.10.2019 mentioned in the heading of appeal is not attached with the appeal be placed on it.
- 8 ✓ Page no.28, 43, 51 & 54 of the appeal are illegible.

No. 684 /Inst./2024/KPST,

DL. 12/9 /2024.

  
OFFICE ASSISTANT  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Bilal ud Din Adv.  
High Court Peshawar.

objections removed by signing memo of Appeal by Appellant and correcting address, and the documents attached was attested, The word Petitioner was removed from Appeal copy of order 11-10-2019 is attached. The order mentioned in Para 10 is not available nor that it is impugned before this Tribunal so that is not required to be attached, The better copies of given pages has been filed, So the case may kindly be fixed before the honorable Tribunal.

Bilal

# FRONTIER RESERVE POLICE

Name: **Sikandar Ali Khan**

Rank: **Constable**

Belt No: **1881**

Valid Upto: **31-08-2021**

S.O / FRP: 1881



**Khyber Pakhtunkhwa Police**

**C.N.I.C. No :** 17291-4834353-1

**Height:** 5-7      **Blood Group:** B+ve

**Personal Contact :** 8316-8313231

1. This card is non transferable and is the property of Govt of Khyber Pakhtunkhwa
2. In the event of loss report immediately to nearest Police Station and the issuing authority giving original number of the card.
3. Finder of the lost card is requested to deposit the card to the nearest Police Station.

**Sajid Ali Khan**

**Verification Contact No.**

**001-0204983**



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

Service Appeal No. 1688 /2024

Sikandar Ali Khan .....Appellant


**VERSUS**

Inspector General of Police Khyber Pakhtunkhwa  
Central Headquarter, Peshawar.....Respondents

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Appellant  
Through   
**Bilal-ud-Din**  
Advocate  
Supreme Court of Pakistan

**Chamber:**  
Office No.24, Qadeem Jungara,  
Opposite GPO Peshawar Cantt.  
Cell No. 0333-9121558  
Email: [bilal.hc.advocate@gmail.com](mailto:bilal.hc.advocate@gmail.com)

(1)

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

Service Appeal No. 1688 /2024

Sikandar Ali Khan S/o Ali Khan  
R/o Mohallah Bara Khel, Nowshera Kalan.

.....Appellant

**VERSUS**

1. Inspector General of Police, Khyber Pakhtunkhwa, Central Headquarter, Peshawar.
2. Commandant F.R.P, Khyber Pakhtunkhwa, Peshawar.

....Respondents

**SERVICE APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 09.08.2024, WHEREBY APPEAL/ REVISION APPLICATION OF THE APPELLANT AGAINST THE ORDER DATED 30.05.2024 WAS DISMISSED/ REJECTED, WHEREBY DEPARTMENTAL APPEAL OF APPELLANT AGAINST THE REMOVAL FROM SERVICE ORDER DATED 11.10.2019 WAS DISMISSED.**

**Respectfully Sheweth:-**

Appellant humbly submits:

- 1) That the appellant is citizen of Pakistan and having domicile of District Nowshera, Khyber Pakhtunkhwa.

- 2
- 2) That respondents in the year 2010 advertised various posts of Constables in Police Department through publication. The petitioner also applied and qualified the entire test, but he was not appointed on the ground of overage on which the appellant filed a Writ Petition No.777/1, which was allowed vide order dated 15.02.2012. (Copy of the order dated 15.02.2012 is attached)
  - 3) That soon after the order, the appellant given his joining to the concerned office. The petitioner was deputed to police line for performance of his duty, where he performed his duty for 02 months. After 02 months, the appellant was sent to PTC Hangu by the respondent No.3 for Training Course, but on 24.07.2012, the Commandant PTC Hangu sent him back and not allowed him for the course on the ground that he is overage and refused to follow the order of the hon'ble Peshawar High Court, Peshawar. (Copy of Naqal Mad is attached)
  - 4) That A.I.G.P, F.R.P on 27.07.2012 again issued letter for the recruitment course to the Commandant PTC and explained that appellant was appointed through Court order, but this time again Commandant PTC, Hangu, not allowed appellant for course and returned him back. (Copy of letter is attached)
  - 5) That on 01.08.2012, respondent No.2/ Commandant FRP again deputed appellant to PTC, with nominal roll of FRP, and on 10.08.2012, AIG F.R.P sent detailed letter to Commandants PTC about the appellant and



mentioned the order of the Hon'ble High Court, but on 13.08.2012 Commandant PTC again sent the appellant back from PTC, without allowing him for attendance and clearly stated that he do not accept any Court order. (Copy of the letters are attached)

- 6) That on 04.09.2012, Commandant PTC sent letter No.586 to FRP that he does not accept the appellant for course. This time the police line also refused to accept the appellant. (Copies of letters are attached)
- 7) That appellant was made rolling stone between F.R.P and PTC Hangu, his salaries were also stopped. He was not allowed to perform his duty anywhere, he was also not allowed for the course/ training, appellant made hectic struggle, but in vain.
- 8) That appellant also moved various applications to the high-ups, but no remedy was granted to him. Finally he was orally informed that his service has been terminated and his salary was also stopped since then he moved various applications to the high-ups.
- 9) That the appellant was mentally tortured he went into stress and depression by the respondents by refusing him again and again for training at PTC Hangu by stopping his salary and by refusing to allow him on job.
- 10) That the respondents on 22.12.2014 illegally dismissed the appellant from service without any show cause, inquiry without proper hearing to the appellant, the

(5)

appellant was totally unaware about his dismissal order nor he was given notice about dismissal, during the pendency of the writ petition before the Hon'ble High Court he got knowledge about the said order.

- 11) That appellant filed representation before respondents for his redressal, but that was too dismissed on 10.05.2016. (Copy of appeal and order is attached)
- 12) That it is, pertinent to mention here that on 04.07.2014, the appellant moved an application for release of his salary and closer of inquiry against him, which was allowed by authority and his salaries was released and inquiry against him was closed. Similarly, he was also issued service card on 01.08.2014 and was reinstated in service. (Copy of application and card are attached)
- 13) That against the order of respondents dated 10.05.2016 and 22.12.2014, the appellant filed, an Appeal No.245/2017 before this Hon'ble Tribunal, which was allowed on 29.04.2019 and the matter was remitted to the I.G.P Khyber Pakhtunkhwa for re-decision on appeal of the appellant within 60 days.
- 14) That on 28.06.2019 the A.I.G decided the said appeal, whereby de-novo inquiry was ordered and the appellant was reinstated in service for the purpose and the period for which appellant was absent was treated as leave without pay.

15) That on 12.07.2019, the Commandant F.R.P (respondent No.2) issued fresh charge sheet and sent it to S.P, FRP Peshawar for de-novo inquiry. The Appellant submitted written reply to the charge sheet on 01.08.2019. On 23.09.2019, the Deputy Commandant F.R.P issued final show cause notice to the appellant for which on 08.10.2019 the appellant submitted his reply, but after that no any kind of order was passed by the authority, despite of that he was reinstated and service card was issued to him and he joined the duty. The appellant also received salaries for some time, Belt No.1881 was also issued to him. The appellant performed his duty honestly and satisfactorily then after some time appellant salary was stopped despite of that he kept continue his duties, when he approached the respondents' office he was informed that his inquiry is still in field and not yet concluded and advised the appellant to wait at home until such order is passed, on such inquiry the appellant paid continues visit to the respondents' office, then on 29.04.2024 the appellant moved an application to the respondent to clear his status that whether he is in service or otherwise, but on 30.05.2024 that dismissed and not entertained by the respondents, then at very first time he observed in Para-6 that informed that his appeal had been dismissed earlier on 11.10.2019, which was never conveyed to the appellant nor he was informed about that nor he received the said for which the appellant is

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ready to take special oath on Holy Quran. Then against that order dated 30.05.2024, the appellant made Appeal to I.G.P K.P, which was dismissed by the respondent No.1 on 09.08.2024 which was conveyed and received by appellant on 27.08.2024, hence this appeal before this hon'ble tribunal on following grounds:-

**GROUND.**

- A. That the respondent illegally not follow the order and directions issued by this hon'ble Tribunal in its order dated 29.04.2019, thus committed illegality and did injustice to the appellant.
- B. That the impugned acts/ omission and orders passed by respondents are illegal, without lawful authority and without jurisdiction, hence having no effect in the eye of law.
- C. That the appellant has not been treated according to law as no opportunity of being heard has been provided by the authority.
- D. That the appellant has been condemned unheard as no chance of personal hearing or defence was provided to him prior to passing the impugned order which is against the natural justice and the impugned order was passed at the back of the appellant, which on this score alone is liable to be declare as illegal and set aside.

⑦

E. That the appellant has been punished for the fault if any committed by the others, which is not permissible under the law to deprive the appellant from his legal vested rights and he was punished only for that why he approached the High Court and this Tribunal


F. That the appellant seeks permission to advance all other grounds at the time of hearing of the main appeal.

**PRAYER**

It is therefore, humbly prayed that on acceptance of this appeal, the orders dated 09.08.2024 and 30.05.2024 and the removal from service order dated 11.10.2019 may kindly be set aside and the appellant be reinstated in service with all back benefits.

Any other relief, deemed fit may also be graciously granted.

Dated:

Appellant  
Through   
**Bilal ud Din**  
Advocate  
Supreme Court of Pakistan

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

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

Sikandr Ali Khan.....(Appellant)

**V E R S U S**

Inspector General of Police Khyber Pakhtunkhwa, Central  
Headquarter, Peshawar.....(Respondents)

**AFFIDAVIT**

I, Sikandr Ali Khan S/o Ali Khan R/o Mohallah Bara  
Khel, Nowshera Kalan, solemnly affirm and declare that the  
contents of the **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**

(9)

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

C.M No. \_\_\_\_\_/2024

IN

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

Sikandar Ali Khan .....Appellant

**VERSUS**

Inspector General of Police Khyber Pakhtunkhwa  
Central Headquarter, Peshawar..... Respondents

**APPLICATION FOR CONDONATION OF DELAY IN  
FILING OF THIS APPEAL**

**Respectfully Sheweth:**

1. That the appellant has filed accompanying appeal before this hon'ble Tribunal, the appellant seeks condonation of delay if any in filing of the appeal.
2. That the final order/ impugned order dated 09.08.2024 was provided and received by the appellant 27.08.2024, then some days took on preparation of case by counsel.
3. That the appellant had no knowledge about the termination / dismissal order nor was conveyed by the respondents nor the appellant was aware about the proceeding and final order in denovo inquiry nor the department informed about and send any copy to the appellant.
4. That the said order of termination is illegal and void and the Law does not provide any limitation against the illegal and void order.

- 5. That the delay if any is neither deliberate no intentional, but due to the above mentioned reason.
- 6. That the grounds of the appeal may kindly be considered as part and parcel of this appeal.

It is, therefore, humbly prayed that on acceptance of this application, the delay if any may kindly be condoned, in the best interest of justice and the appeal be decided on merits.

Appellant  
Through Bilal  
**Bilal-ud-Din**  
Advocate  
Supreme Court of Pakistan



1/1

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

C.M. No. \_\_\_\_\_/20 .

In

Service Appeal No. \_\_\_\_\_/20 .

Sikandr Ali Khan.....(Appellant)

**V E R S U S**

Inspector General of Police Khyber Pakhtunkhwa, Central  
Headquarter, Peshawar.....(Respondents)

**AFFIDAVIT**

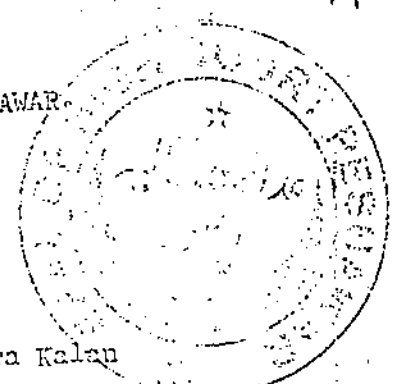
I, Sikandr Ali Khan S/o Ali Khan R/o Mohallah Bara  
Khel, Nowshera Kalan, solemnly affirm and declare that the  
contents of the **Application** are true and correct to the best of  
my knowledge and belief and nothing has been concealed from  
this Hon'ble Tribunal.

**DEPONENT**

12

Annex- "A"

IN THE PESHAWAR HIGH COURT, PESHAWAR.



Writ petition No. 777 / 2011

Sikandar Ali Khan son of Ali Khan,  
resident of Mohallah Sera Khel, Nowshera Kalan  
..... Petitioner

Versus

1. Inspector General of Police, K.P.K.  
Headquarter Central Police Officer, K.P.K.
2. Government of K.P.K. through Chief Secretary  
Civil Secretariat, Peshawar.
3. Additional Inspector General of Police,  
K.P.K. Headquarter Central Police, K.P.K.
4. Commandant, Frontier Reserve Police, K.P.K.
5. District Police Officer, Nowshera
6. Superintendent of Police, Frontier Reserve  
Police, K.P.K.

Attested to  
True Cop.

*[Signature]*

..... Respondents.

WRIT PERMISSION UNDER ARTICLE 199 OF THE  
CONSTITUTION OF ISLAMIC REPUBLIC OF  
PAKISTAN, 1973.

*[Signature]*  
..... Court

Respectfully sheweth:

1. That the petitioner is well qualified upto graduate  
and belongs to flooded affected area of District  
Nowshera.
2. That the respondent No. 3 through different newspapers  
advertised post of Police Constable in the different  
District of K.P.K. in the Police Department. (Copy  
of the advertisement is attached as Annexure "A").

FORM 'A'  
FORM OF ORDER SHEET  
Court of -----

Case No. ----- of ----- 200

Serial No of Order or proceedings	Date of Order Or proceedings	
1.	2.	3.
	15.02.2012	<p data-bbox="518 687 774 726"><u>W.P. No.777/2011.</u></p> <p data-bbox="518 738 1109 828">Present: Mr.Bilaluddin Khattak, advocate for petitioner.</p> <p data-bbox="518 891 1236 1961"> <u>MIAN FASIHUL MULK, J.-</u> Petitioner, having a graduate degree, applied for appointment as Constable in the District Police in response to advertisement made by respondents. The age limit was fixed in between 18 to 25 years. Petitioner applied for the post and being over age by few months also submitted an application for age relaxation, which was allowed and age relaxation as requested was granted to him by the DIG/Headquarters as evident from the endorsement made on the application in question. Petitioner after going through the process of test, interview and medical fitness was appointed as Constable alongwith 308 other candidates vide order dated 07.12.2010.         </p> <p data-bbox="550 1987 1236 2191">2. Grievance of petitioner is that when he reported for duty in response to the order of appointment, he was refused to join the same on the ground that he is</p>

Attested to  
True copy.  
B.D.

B.D.

over-age.

3. As per record appended with the petition, not only the upper age limit has been relaxed to the petitioner by the DIG on application of petitioner submitted before his appointment but as per Notification of the Provincial Police Officer dated 30.12.2009, amendment was brought in the Police Rules, 1934 with the approval of Government of KPK and age limit was fixed for various categories of Constables as 18 to 35 years.

4. Refusal of respondents to allow the petitioner to join his duties is, therefore, uncalled for and needs no further clarification in view of the documentary proof available on file.

5. Consequently, instant writ petition is admitted and allowed in the terms that respondents shall forthwith allow the petitioner to join his duty as a Constable in view of the appointment order dated 07.12.2010, wherein his name appears at S. No.212.

114

Attested to True Copy  
*[Signature]*

*Office/16/12*

*sd/- Mian Farid ul Malik - J*  
*sd/- Wasim Ahmad Sethi - J*

CERTIFIED TO BE TRUE COPY

*[Signature]*

22/2/12

10830

Date of Presentation of Application 20-2-12

Number of Pages 3

Stamping Fee 1

Registration Fee 6

Date of Preparation of Copy 22-2-12

Date Given For Delivery 22/2/12

Date of Delivery of Copy 24/2/12

Received By *[Signature]*

*25510*

*sd*

*14/11/12*

Executive Officer  
 District Police Officer  
 District Police Officer  
 District Police Officer

(15)

Annex - "B"

تفاتیہ ترسی

لقلہ علیہ

ATC سٹیو

صدر الحزب رولڈ کوٹوالی کوٹوالی علیہ ۱۱ بجی کوٹوالی اسماعیل بی بی مورخہ ۲۱/۱۱/۲۰۱۲  
 وقت درجہ نصیب سکندر علی (۱۲۷۸/۵۸) احمد علی بیگ  
 FRP/۱۱۵۰ اسماعیل ۲۱۴۳/۵۷ احمد علی بیگ  
 یو جی عزیز یادہ علیہ کوٹوالی ۲۰۰۶/۵۸ محمد عمران خان  
 علیہ و اس میں سید عالم پور علیہ ۲۰۱۲-۷-۲۳/۵۸ محمد عمران خان  
 سرور علی و بی سامان بی بی بیگم علیہ خود روایت  
 کتب مناسب پر اس میں بیگم

Attested To be True Copy.

*[Signature]*

ہمایلی  
 لقلہ علیہ اہل لوجہ  
 Police Station  
 P.T.C  
 24-7-12

From: -

Add: JCP Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar

16

Annex - C

To: -

The Commandant FCU Peshawar

No. 4274

D.C. dated Peshawar the 27/01/2012.

Subject: -

RECRUIT COURSE

Memo: -

Please refer to your Memo No. 11577-GO dated 11/01/12.

1. Constable Waheed Hussain No. 6127 was enlisted on 01.01.11 according to Govt. instructions No. 811-FCU dated 26.01.2009, age shall be calculated from the closing date of submission of application i.e. 05.11.2011. Therefore he was not overage because last date for submission of applications was 05.11.2011.
2. Constable Ziafat Ullah No. 6128 was enlisted on 01.01.2012 his upper age 18 months relaxed by the then Deputy Commandant FRP in the light of Govt. instructions.
3. Constable Sikander Ali Khan No. 1278 was enlisted on 07.12.2010 but he was overage by 03 years when he reported arrival for duty he was refused to join the same on the grounds that he is overage. He lodged Writ Petition No. 777/2011 before the Hon'ble Peshawar High Court. The Court has ruled that age limit was fixed for various categories of constables as 18 to 35 years in the light of Provincial Police Rules, a notification No. 31699-31745-I-41 dated 30.12.2009 amended in Police Rules. As per CPO direction Constable Sikander Ali Khan No. 1278 was allowed to join his duty as Constable. In view of the remaining circumstances and the fact that he has filed writ petition No. 777/2011 of Constable Sikander Ali Khan No. 1278, copies of Court Decisions are attached.

Attested to  
So True Copy  
B. J. Lal

Add: JCP Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar

*[Signature]*

2

( Better copy on next page )

13

17

Better copy of Annex - 'C'

(Better Copy)

From The Addl: IGP/Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar

To The Commandant PTC Hangu

No. 4274 /EC, dated Peshawar the 27/07/2012

Subject: RECRUIT COURSE:

Memo:

In continuation of this office Memo: No. 1775-77/GC dated 11/ /2012.

1. Constable Waheed Hussain Shah No. 2225 was enlisted on 04/01/2012. According to Govt: instructions issued vide Endst: NO. 821-76/C-1 dated 04/01/2009 age shall be calculated from the closing date of submission applications for a particular post. Therefore he was not over age because test date for submission of application was 05/11/2011.
2. Constable Ziafat Ullah No. 6428 was enlisted on 04/01/2012. His upper age 18 months relaxed by the then Deputy Commandant FRP in the light of Govt: instructions:
3. Constable Sikandar Ali No. 1278 enlisted on 07/12/2010 but he was over age by 03 years when he reported arrival for duty he was refused to join the same on the grounds that he is overage. He lodged Writ Petition NO. 777/2011 before the Hon'ble Peshawar High Court. The Hon'ble Court deiced that age limit was fixed for various categories of Constable is 18 to 35 years in the light of Provincial Police Officer Notification No. 31699-31745/E-II dated 30/12/2009, amended in Police Rules. As per CPO direction Constable Sikandar Ali Khan No. 1278 was allowed to join his duty as Constable. Therefore age of the remaining Constables may be considered in the light of Writ Petition 777/2011 of Constable Sikandar Ali Khan No. 1278, (Copy of Court Decision is attached).

Attested to -  
True copy.  
B. Qureshi

Addl: IGP/Commandant  
Frontier reserve Police  
Khyber Pakhtunkhwa Peshawar

(18)

1998

في يوم 27/7/2012

مطهر جليل

Attested to a True Copy.  
B. B. B.

المرجع المذكور في 1775-77/1998 في تاريخ 27/7/2012

2113 ملحق (1) التاريخ 27/7/2012

2113 ملحق (2) التاريخ 27/7/2012

2113 ملحق (3) التاريخ 27/7/2012

ملحق (4) التاريخ 27/7/2012

مطهر جليل

27/7/2012

مطهر جليل

(2)



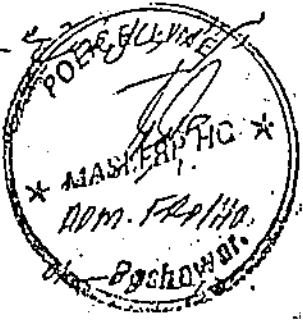
صالح باور

انور فقیر  
P.P. 112

گورنمنٹ خواتین افسس آف ایجوکیشن پٹنہ

سکاٹسٹریٹ کراچی میں قائم ہے۔ کہ بحوالہ چھٹی سترہویں نمبر 1775/77/52 ان کے ذریعہ  
 11/07/12  
 2143  
 176، 1278، 2225  
 4274/52 نمبر 27  
 07  
 12  
 01 08  
 12

Attested  
to be true  
copy.  
B. J. Lal



22  
01 08  
12

16 20 Annex - E

Tele/Fax No. 091-9210948

From: The Addl: IGP/Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar.

To: The Commandant F.R.P. Hangu.

No. 4568 AEC, dated Peshawar the 10 / 08 / 2012.

Subject: RECRUIT COURSE

Memo: -

Attested to be  
True Copy.  
*BQilal*

In continuation of this office Memo: No. 4274/E dated 27.07.2012.

1. Constable Waheed Hussain Shah No. 2225 was enlisted on 04.01.2012. His date of birth is 01.01.1987 on the basis of which his age comes 25 years and 03 days on 04.01.2012. According to Govt. instructions issued vide Endst. No. 821-76/C-1 dated 26.01.2009, age shall be calculated from the closing date of submission applications for a particular post. Therefore he was not over age because last date for submission of applications was 05.11.2011. He shown over age by 03 years vide your Memo: No. 1775-77/GC dated 11.07.2012 is incorrect.
2. Constable Ziafat Ullah No. 6428 was enlisted on 04.01.2012. His upper age 18 months relaxed by the then Deputy Commandant FRP in the light of Govt. instructions.
3. Constable Sikander Ali No. 1278 was enlisted on 07.12.2011. At the time over age by 03 years when he reported arrival for duty he was refused to join the same on the grounds that he is overage. He lodged Writ Petition No. 777/2011 before the Hon. able Peshawar High Court. The Hon. able Court decided that age limit was fixed for various categories of Constables, is 18 to 35 years in the light of Provincial Police Officer Notification No. 31699-31745/A-11 dated 30.12.2009, amended in Police Rules. As per CPO direction Constable Sikander Ali Khan No. 1278 was allowed to join his duty as Constable. Copies of court decision and Govt. Instructions are enclosed for ready reference.

It is therefore, requested that the above named Constables may be allowed to continue their Basic Recruit Course.

*SE 12/18*  
*E-11*  
*Al Pait 2012*  
*an in*  
*27/8*  
*PSO*

Addl: IGP/Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar

*6-8-2012*

(Note: Better copy on next page, 17)

(17) (21)

(Better Copy)

Tele/Fax No. 091-9210945

From The Addl: IGP/Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar

To The Commandant PTC Hangu

No. 4568 /EC, dated Peshawar the 10/08/2012

Subject: RECRUIT COURSE:

Memo:

Attested to be  
True better copy  
*[Signature]*

In continuation of this office Memo: No. 4274/EC dated 27/07/2012.

1. Constable Waheed Hussain Shah No. 2225 was enlisted on 04/01/2012. His date of birth is 01/01/1987 on the basis of which his age comes 25 years and 03 days on 04/01/2012. According to Govt: instructions issued vide Endst: NO. 821-76/C-1 dated 04/01/2009 age shall be calculated from the closing date of submission applications for a particular post. Therefore he was not over age because test date for submission of application was 05/11/2011. He shown over age by 03 years vide your Memo: No. 1775-77/GC dated 11/07/2012 is incorrect.
2. Constable Ziafat Ullah No. 6428 was enlisted on 04/01/2012. His upper age 18 months relaxed by the then Deputy Commandant FRP in the light of Govt: instructions:
3. Constable Sikandar Ali No. 1278 entitled on 07/12/2010 at he was over age by 03 years when he reported arrival for duty he was refused to join the same on the grounds that he is overage. He lodged Writ Petition NO. 777/2011 before the Hon'ble Peshawar High Court. The Hon'ble Court deiced that age limit was fixed for various categories of Constable is 18 to 35 years in the light of Provincial Police Officer Notification No. 31699-31745/E-II dated 30/12/2009, amended in Police Rules. As per CPO direction Constable Sikandar Ali Khan No. 1278 was allowed to join his duty as Constable. Copies of Court decision and Govt: instructions are enclosed for ready reference.

It is therefore, requested that the above named Constable may be allowed to continue their Basic Recruit Course.

Addl: IGP/Commandant  
Frontier reserve Police  
Khyber Pakhtunkhwa Peshawar

(18)

(22)

لذکرہ MAH/NO

صہیل در

کذریعہ صہیل در لائن آف سہیل در

کبار سہیل در صہیل در لائن آف سہیل در و صہیل در صہیل در 9225 صہیل در صہیل در 6428  
سہیل در صہیل در 1272 کو صہیل در صہیل در صہیل در 4568 صہیل در صہیل در 10 صہیل در صہیل در  
MAH/NO صہیل در صہیل در صہیل در صہیل در صہیل در صہیل در صہیل در صہیل در

صہیل در صہیل در

MAH/NO  
13/8/2012

صہیل در

Attested to be True Copy

Signature

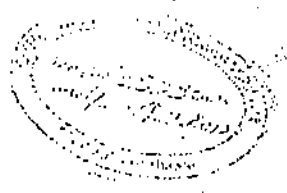
23

Annex-F



Ph 0917255550  
Fax 0917255550

Office Of The Commandant Police Training College Peshawar



To: The Commandant PPT Peshawar.  
No. 586 /EC, Dated Hangu date, 04-09-2012.  
Subject: RECRUIT COURSE  
Memo:

Please refer to your office Memo No-4568/EC dated 10.08.2012.

Attested  
be true. c

All the recruits of your list have already been returned as unqualified vide this office order Fndstt No. 1840-4463C dated 31.07.2012.

On receiving of your above quoted reference, the case of all the three recruits Constable have been examined. Recruit constable Waheed Hussain Shah No.2225 has been considered for recruit course but he would be accommodated in the next term which will be commenced from 1st Oct. 2012.

Your office has not advised the name of the recruit constable Biazar Khan No.6128 of 1st term.

To fit the case of the recruit Shaukat Ali Khan No. 2225 in the next term it is suggested that as per decision of the Government of Punjab Peshawar the number of recruit constables in categories of constable is 150 in 1st term in the light of recruitment order No. 1140/2011 dated 10.08.2011 and it is not clear that the recruit named has been enlisted in what category, therefore, needs necessary attention.

EC  
Rafiq  
M  
1-311-28P/Commandant

*[Signature]*  
Commandant  
Police Training College, Peshawar

(NOTE: Better copy at P 20)

~~20~~ (24)

(Better Copy)

Ph: # 0925-621886  
Fax # 0325-62326

Office of the Commandant Police Training College Hangu

To The Commandant FRP Peshawar.

No. 586 /EC, Dated Hangu the 04/09/2012

Subject: Recruit Course

Memo:

Please refer to your office Memo No. 4568/EC dated 10/08/2012

All the recruits of your Ectt: have already been returned as unqualified vide this office order Endstt No. 1840-44/GC dated 31/07/2012.

On receiving of your above quoted reference, the case of all the three recruits Constable have been examined recruit constable Waheed Hussain Shah No. 2225 has been considered for recruit course but he would be accommodated in the next term which will be commenced from 1<sup>st</sup> October 2012.

This office has not approved with the age relaxation given to recruit constable Ziyafat Ullah No. 6428 of FRP Bannu.

So far the case of Constable Sikandar Ali Khan No. 1278 is concerned. It is correct that as per decision of the Peshawar High Court Peshawar that age fixed for various categories of constable is 18 to 35 years in the High of Provincial Police Officer, Notification. Endst: NO. 31699-31745, dated 30/12/2009, but it is not clear that the above named has been enlisted in with capacity, therefore, needs necessary ~~clarification~~. Clarification.

Commandant  
Police Training College Hangu

04/09/2012 کو ٹرائل کی ٹی سی ہو گئے تھے۔ جس میں اس نے

وحید حسین شاہ کو سلیپ کیا کورس کیا۔ لیکن صحیحہ کبھی سلیپ نہیں

شامل کر دیا گیا۔ جن میں اسد اللہ بیٹ لبر (2143) ایف آر پی

شاہ (425) محمد رفیق (176) صادق شاہ (295) وحید حسین

وقت بھی نہیں سلیپ کیا۔ جب میں نے جو یاد اور صفائی کورٹ کا آڈر

دینی توفیق میں ڈالا تھا۔ 5/10/2012 کو دوبارہ کورس لیکے ہو گئے

بروانہ کے پاس کر دیا۔ اور کہا کہ کھانڈ آپ کو نہیں چھوڑتا ہے

دائیں جہاں یہ ایف آر پی والے بھی میرے ساتھ ناروا سلوک کیا

اور صحیحہ غیر حاضر کر دیا۔ اور نہ حاضر کر کے۔ اگر صحیحہ

عمر حاضر کرنا تھی تو میں

اسی محنت کیوں کرنا، جسکو جانا، اور پھر پیکار پولیس دہشت گردانہ

میں ~~میں~~ مجھے بھی ذہنی کوفت میں ڈال دیا، میرا بھی دل بھر گیا

حکمہ پولیس کے ایسے افسروں سے جو کہ اپنے آپ کو قانون سے بلا کر سمجھتے

تھے، نہ حاضری کرتے، اور نہ تنخواہ کیلئے چھوڑتے، مجھے بھی ان لوگوں نے

چھوڑ لیا، کہ میں یہ تو کئی چھوڑ دوں، لیکن اللہ کو کچھ اور ہی منظور تھا۔

23/05/2014 کو چارج شیٹ ملا، کیونکہ 17/05/2014 کو میں نے بطور ریکورس

کیا اور (FRP) میں حاضری کر دی تھی۔ 9/06/2014 کو فائنل شوکار ملا، میرا اور

انکو اٹری تھی جو کہ حتم کر دی تھی، ڈیٹی ٹھانڈے سے اور 7/07/2014 کو مجھے تنخواہ

میل گئی جس کی قافی موجود ہے، میرا سروس فارڈ (SP Security) سے بنایا

گیا، جس کی ایٹو ڈیٹ 01-08-2014 اور ایکسپیری ڈیٹ 01-08/2014

اس دوران ماہانہ ریٹائرمنٹ سنٹر غالباً 9/10/2014 کو گیا، وہاں سے ریٹائر

جاری تھا، محرم کی ڈیوٹی پوری پور کے علاقے بانڈی پورہ میں ادا کی

12/2014 کو جب تنخواہ کے پے گیا، تو پتہ چلا، کہ ادھی تنخواہ پے

لو مجھے یہ پتا چلا، کہ میں درخواست فوری طور پر نہ شوکار، نہ چارج

شیٹ، نو کوئی اور وجہ، بعد میں حکمہ کو اس میں دی، لیکن کئی مہینوں

کے بعد بھی جب ان کا جواب آیا، تو حکمہ نے بھی حال نہیں لیا، آپ

دوبارہ معافی کورٹ سے رجوع لیا، اور انصاف کا طالبگار ہوں

شکر یہ

1278 FRP

26

255



حساب عالی (27)

17/05/2014 کو میں نے حاضری کر دی اور میرے بعد اوپر انکوائری سنائی  
لیکن اس دوران میں دیوتا دینا رہا۔

4/07/2014 کو میں نے ڈپٹی کمشنر (FRP)  
کو متوجہ کر لیا۔ جو کہ منظور ہوئی اور 07/07/2014  
کو میرے متوجہ مل گئی۔ جس کے بعد مسلسل مین 2015 تک متوجہ ہیں۔  
اور میرے اوپر انکوائری ختم ہو گئی ہے۔ (with out pay) کیا گیا۔

سیرا سرورس فاؤنڈیشن بھی 01/08/2014  
کو SP. Security Peshawar سے بنایا گیا جسکی آخری معاہدہ

01/08/2017 سے ہے۔ جس میں Basic salary نامی معاہدہ میرے رجسٹر

کیا گیا۔ نہ اس دوران میرے سٹو کاڈ ملا۔ نہ کوئی اطلاع۔ نہ چارج شیٹ  
جو کہ غیر قانونی رجسٹر ہے۔ شی بار جسکے کو درخواست دی لیکن کچھ  
نہ بنا۔

سکندر  
ہیڈ آف

1278/FRP  
محلہ  
صوبائی  
0315-9313231-



28

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar


No. S/ 3474-14/16 Dated Peshawar the 10/03/2016

ORDER

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by Ex-Recruit Constable Sikandar No. 1278. The appellant was dismissed from service w.e.f 06.10.2012 by Deputy Commandant, FRP, Khyber Pakhtunkhwa, Peshawar vide order No. 1371-76/PA/FRP/HQrs: dated 22.12.2014 on the charges that he was sent for Recruit Course at PTC Hangu on 06.10.2012, from wherein he absented himself from Training and was returned to FRP as unqualified vide PTC Hangu signal No. P502/GC, dated 23.10.2012 but he failed to report his arrival at FRP/HQrs: Peshawar and absented himself from duty w.e.f 06.10.2012 to 17.05.2014 for a total period of 01 year and 07 months and 11 days.

Meeting of Appeal Board was held on 03.03.2016, wherein appellant was heard in person. Petitioner contended illness behind his absence from duty. Service record of the petitioner was perused which revealed that appellant bears an incorrigible character as he was twice reverted unqualified from basic training. Furthermore, his appeal is also time barred. Thus his appeal is rejected on grounds of limitation and merit as well.

This order is issued with the approval by the Competent Authority.

  
(NAJEEB-UR-REHMAN BUGVI)  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

No. S/ 3474-14/16

Copy of the above is forwarded to the:

1. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: E-IV CPO Peshawar.
7. Central Registry, CPO.

جناب عالی

گزارش کے ترمیم مسائل کے حوالہ 17/15/14 سے 22/10/14 تک صاف ہو کر  
 گئے ہیں اور ابھی تک شیواہ لیڈر کے لیے لیڈر آف ایجنسی کے  
 پر ایچ آر جوائنٹ لٹیرا ایجنسی کے لیے کمرہ شیواہ کوئی  
 ایجنسی کو ایجنسی کے لیے ایجنسی کے لیے ایجنسی کے لیے  
 عزیز اور ادارہ کے لیے ایجنسی کے لیے ایجنسی کے لیے  
 کو حوالہ رکھ کر شیواہ کے لیے ایجنسی کے لیے ایجنسی کے لیے  
 گزارش ہوگی

الموقع 4/07/14

1273  
22/10/14

افغانی  
 P قیام نامہ ایجنسی کے لیے ایجنسی کے لیے ایجنسی کے لیے

OAS/110

Pass request - send

of - comdt, pd  
 4/7/14

درخواست دہندہ AP کے نام سے  
 145 - 145  
 10 - 10  
 2012 - 2014  
 17 - 17  
 2014 - 2014  
 115 - 115  
 4/7/14

Pay be released except  
 of his absence period pay  
 send  
 of - comdt, pd  
 7/7/2014

30

~~29~~ Annex-I

**FRONTIER RESERVE POLICE**

S.# / FRP: 1278

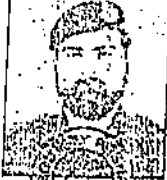
Name: Sikandar Ali Khan

Rank: Constable

Belt No: 1278

Date of issue: 01.08.2014

Valid Upto: 01.03.2017



*[Signature]*  
Signature  
Issuing Authority

**KHYBER PAKHTUNKHWA POLICE**


C.N.I.C. No: 17201-4034253-1

Height: "5.7" Blood Group: B +ve

Address: Moh: Bara Khej, Nowshera Kalan Distt: Nowshera

1. This card is non transferable and is the property of Govt. of Khyber Pakhtunkhwa
2. In the event of loss report immediately to nearest Police Station and the issuing authority giving original number of the card.
3. Holder of the lost card is requested to deposit the card in the nearest Police Station.

Verification Contact No.  
033-6204953



Annex J

(37)

FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

I, Deputy Commandant, FRP, KPK as competent authority do hereby serve you Recruit Constable Sikander, No.1278 of FRP/HQrs, Peshawar.

(1) i- That consequent upon the completion of enquiry conducted against you by DSP Admn,FRP/HQrs for which you were given full opportunity of hearing.

ii- On going through the findings/recommendations of the Inquiry Officer, the material available on record and other connected papers I, am satisfied that you have committed the following acts/omissions per Police Rules 1975.

Whereas you Recruit Constable Sikander, No.1278 of FRP/HQrs remained absent from duty w.e.from 06.10.2012 to 17.05.2014 for the total period of (01) year & (08) month without taking any leave/permission of the Competent Authority. Your this act amounts to gross mis-conduct and punishable.

(2) Therefore, I, Deputy Commandant, FRP, KPK as competent authority has tentatively decided to impose upon you Major/Minor penalty including dismissal from service under the said Rules.

(3) You are, therefore, required to Show Cause as to why not the aforesaid penalty should not be imposed upon you.

(4) If no reply to this Final Show Cause Notice is received within the seven days of it delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and consequently ex-parte action shall be taken against you.

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

میں نے دنیا کا سب سے بڑا  
کامیاب درمختہ خودی خود رسول بنا

0313-9133855

916/14



33

Annex - K

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Appeal No. 245/2017

Date of Institution ... 22.02.2017

Date of Decision ... 29.04.2019



Sikandar Ali Khan son of Ali Khan R/O Mohalla Bara Khel, Nowshera Kalan.  
(Appellant)

VERSUS

The Inspector General of Police, Khyber Pakhtunkhwa Peshawar and four others.  
(Respondents)

Present:

Mr. Bilal-ud-Din Khattak,  
Advocate. ... For appellant

Mr. Muhammad Riaz Khan Paindakhel,  
Assistant Advocate General ... For respondents.

MR. HAMID FAROOQ DURRANI, ... CHAIRMAN  
MR. AHMAD HASSAN, ... MEMBER

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

1. The appellant is aggrieved of order dated 10.05.2016 passed by respondent No. 1, whereby, the appeal/review petition submitted by him under Rule 11-A of the Khyber Pakhtunkhwa Police Rules, 1975 was rejected. He is also aggrieved of order dated 22.12.2014 issued by respondent No. 3 through which he was dismissed from service under Police Rule 12.21 on account of absence from 06.10.2012 to 17.05.2014.

2. We have heard learned counsel for the appellant and learned Asstt. Advocate General on behalf of the respondents. We have also gone through the available record.

**ATTESTED**

CHAIRMAN  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Learned counsel for the appellant argued that the appellant was detailed for training/course to P.T.C Hangu on more than one occasions, however, he was not allowed to complete the course and was sent back on the ground that he was overage. It was contended that the absence of appellant from PTC Hangu was solely because of the conduct of respondents and was thus not attributable to the appellant. He referred to different documents and argued that during the alleged period of absence of appellant he was not only reinstated but was also issued service card on 01.08.2014. It was emphasized that no proper enquiry was conducted against the appellant, therefore too, the impugned orders were not sustainable.

On the other hand, learned Assistant Advocate General argued that the appellant was legally obligated to have reported for resumption of his duty upon his un-successful return from PTC Hangu. The appellant did not do so and was rightly awarded the impugned punishment. He further stated that the review petition of appellant was badly barred by time as the impugned order of dismissal from service was passed on 22.12.2014, while the review petition was preferred in the year 2016.

We have noticed that all along with the record, including the parawise comments submitted by the respondents, the copy of impugned order dated 22.12.2014 was not made available. A copy of the said order was provided at the time of hearing today. This fact complements the stance of the appellant that he came to know regarding the passing of impugned order during pendency of his Writ Petition No. 4452-P/2015 which was brought with the prayer for directions to the respondents to allow the appellant for performance of his duty and for the course/training at PTC Hangu. The contents of Writ Petition suggest that the appellant was not confronted with the order of his dismissal from service till the filing of writ petition. In the said manner, the argument of learned Asstt. A.G

ATTESTED

EX-10  
Kalyan Singh  
Services Officer  
P.O. Hangu

*[Signature]*




regarding the delay in submission of appeal/review petition under Rule 11-A of the rules ibid does not seem to have much force.

4. The contents of impugned order dated 22.12.2014 suggest that the allegation against the appellant was in the form of absence from duty from 06.10.2012 to 17.05.2014. Seen in the context of allegations, it shall be useful to refer to the order No. 7524-25/OASI, dated 09.10.2014, whereby, the appellant was shown to have been selected for recruit course commencing from 09.10.2014 at RTW Mansehra. In the same context it is essential to refer to the service card issued to the appellant on 01.08.2014 which was valid upto 01.08.2017.

5. It is also worth-mentioning that the appellant was initially left out from appointment on the ground of being overage. He, therefore, submitted Writ Petition No. 777/2011 before the Honourable Peshawar High Court which was allowed on 15.02.2012. The appellant was thereafter issued an appointment order on the basis of the judgment, wherein, the issue regarding his age/overage was settled in his favour. On the contrary, the record is suggestive of the fact that unsuccessful return of appellant from recruit course was again on the ground of being over age. The fore-noted facts suggest that the appellant was, by no means, wholly responsible for absence from duty. It requires to be noted here that the absence admitted by the appellant was only for eleven days.

6. We must also refer to the concluding part of the impugned order dated 22.12.2014, wherein, the appellant was shown to have been penalized in terms of dismissal from service by referring to Part 12.21 of the Police Rules 1934. The dismissal from service is, however, a term alien to the contents of said part of the rules, wherein, a constable may be discharged by the Superintendent at any time within three years of appointment if being found un-likely to prove an efficient police official. Admittedly, the appellant was a recruit constable at the relevant time.

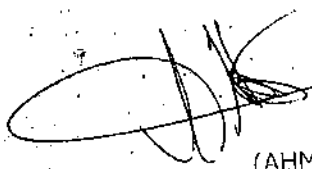
**ATTESTED**

  
 [Signature]  
 [Name]  
 [Title]  
 [Address]

36

7. In view of the above, we consider it appropriate to dispose of instant appeal in terms that the matter stands remitted to the respondent No.1 for re-decision of appeal/review petition of the appellant within sixty days from the receipt of copy of instant judgment. Needless to note that the appellant shall be provided fair opportunity of representation and defence during the rehearing by respondent No. 1.


Parties are left to bear their respective costs. File be consigned to the record room.



(AHMAD HASSAN)  
MEMBER

  
(HAMID FAROOQ DURRANI)  
CHAIRMAN

ANNOUNCED  
29.04.2019

**Certified to be true copy**  
  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Date of Presentation of \_\_\_\_\_ 10-05-19  
Number of Sheets \_\_\_\_\_ 2000  
Copying Fee \_\_\_\_\_ 10-00  
Urgent \_\_\_\_\_ 0-00  
Total \_\_\_\_\_ 10-00  
Name of Case \_\_\_\_\_  
Date of Completion of Case \_\_\_\_\_ 10-05-19  
Date of Delivery of Copy \_\_\_\_\_ 10-05-19

①      37

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

Service Appeal No. \_\_\_\_\_/2017

Sikandr Ali Khan S/o Ali Khan R/o Mohallah Bara Khel,  
Nowshera Kalan.....(Appellant)

**V E R S U S**

1. Inspector General of Police Khyber Pakhtunkhwa, Central Headquarter, Peshawar.
- × 2. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
3. Commandant F.R.P, Khyber Pakhtunkhwa, Peshawar.
- × 4. Commandant P.T.C, Hangu.....(Respondents)

**APPEAL U/S 4 OF KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNAL**  
**ACT, 1974, AGAINST THE ORDER DATED**  
**10/05/2016 PASSED BY RESPONDENTS**  
**WHEREBY DEPARTMENTAL APPEAL/**  
**REPRESENTATION OF THE APPELLANT**  
**WAS DISMISSED AND AGAINST THE**  
**DISMISSAL ORDER OF THE APPELLANT**  
**DATED 22/12/2014.**

Respectfully Sheweth:

1. That the appellant is citizen of Pakistan and having domicile of District Nowshera, Khyber Pakhtunkhwa.
2. The respondents in (2010) advertised various posts of Constables in Police Department through publication. The appellant also applied and qualified the entire test but he was not appointed on the ground of overage on which the appellant filed a Writ Petition No. 777/1 which was allowed vide order dated 15/02/2012. (Copy of order dated 15/02/2012 is annexure "A").
3. That soon after the order the appellant given his joining in the concerned office. He was deputed to police line for performance of his duty, where he performed his duty for 2 months.
4. That after 2 months, appellant was sent to PTC Hangu by the respondent No. 3 for Training/Course, but on 24/07/2012 the Commandant PTC Hangu sent him back and not allowed him for the course on the ground that he is over age and refused to follow

the order of this Hon'ble Court. (Copy of Naqal Mad is annexure "B").

5. That AIGP, F.R.P on 27/07/2012 against issued letter for the recruitment course to the Commandant PTC/Respondent No. 4 and explained that appellant was appointed through Court order, but this time again Commandant PTC, Hangu, not allowed appellant for course and returned him back. (Copy of letter is annexure "C").
  
6. That on 01/08/2012 Respondent No. 3 FRP again deputed appellant to PTC, with nominal roll of FRP, and on 10/08/2012, AIG F.R.P sent detailed letter to Commanded PTC about the appellant and mentioned the order of this Hon'ble Court, but on 13/08/2012 Commandant PTC again sent the appellant back from PTC, without allowing him for attendance and clearly stated that he do not accept any Court order. (Copy of letter is annexed as annexure "D" and "E").
  
7. That on 04/09/2012, Commandant PTC sent letter No. 586 to FRP that he do not accept the appellant for course. This time the police line also refused to

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accept the appellant. (Copies of letter is attached as annexure "F").

8. That appellant was made rolling ball between F.R.P and PTC Hangu, his salaries was also stopped, he was not allowed to performed his duty any where, he was not allowed for the course/ training. Appellant struggle alot but in vain. Appellant moved various applications to high-up's but no remedy was granted to him. Finally he was orally informed that his service has been terminated and his salary was also stopped since than he moved various applications to the high-up's.
9. That the appellant was mentally tortured by the respondents by refusing him again and again for training at PTC Hangu by stopping his salary and by refusing to allow him on job.
10. That the respondents on 22/12/2014 illegally dismissed the appellant from Service without any show cause, inquiry without proper hearing to the appellant, the appellant was totally unaware about his dismissal order nor he was given notice about

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dismissal. During the pendency of Writ Petition before High Court he got knowledge about said order.

11. That appellant filed representation before respondents for his redressal, but that was too dismissed on 10/05/2016. (Copy of appeal and order is attached as annexure "G").
12. That it is pertinent to mention here that on 04/07/2014 the appellant moved an application for release of his salary and closer of inquiry against him which was allowed by authority and his salaries was released and inquiry against him was closed. Similarly he was also issued service card on 01/08/2014 and was reinstated in service. (Copy of application and card are attached as annexure "H" & "I").
13. That appellant filed a Writ Petition No. 4452/2015 on the same grounds which was disposed off on the ground of jurisdiction on \_\_\_\_\_ hence this petition on above grounds. (Copies of Writ Petition and order is attached as annexure "J").


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It is, therefore, humbly prayed that on acceptance of this Service Appeal, the order dated 10/05/2016 of rejection of representation and order of dismissal dated 22/12/2014 may kindly be set aside and appellant be reinstated in service and the respondents be directed to pay the outstanding salaries to the appellant.

Appellant

Through



**Bilal ud Din Khattak**  
Advocate, High Court,  
Peshawar.

Dated: /02/2017





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OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Annex ✓

No. S/ 2313

/19, dated Peshawar the 28/06/2019.

ORDER

This order is hereby passed to dispose of the appeal of Ex-Recruit Constable Sikandar No. 1278 in the light of judgment dated 29.04.2019 of Khyber Pakhtunkhwa Service Tribunal, Peshawar passed on his service appeal No. 245/2017.

Brief facts of the case are that the petitioner was dismissed from service w.e.f 06.10.2012 by Deputy Commandant, FRP, Khyber Pakhtunkhwa, Peshawar vide order No. 1371-76/PA/FRP/HQrs; dated 22.12.2014 on the charges that he was sent for Recruit Course at PTC Hangu on 06.10.2012, from wherein he absented himself from training and was returned to FRP as unqualified vide PTC Hangu signal No. 2562/GC, dated 23.10.2012 but he failed to report his arrival at FRP/HQrs, Peshawar and absented himself from duty w.e.f 06.10.2012 to 17.05.2014 for a total period of 01 year and 07 months and 11 days. His appeal/review petition was rejected vide CPO order No. S/3693/16, dated 10.05.2016. He approached Khyber Pakhtunkhwa Service Tribunal, Peshawar vide service appeal No. 245/2017. The Service Tribunal, Peshawar remitted the appeal for re-decision of appeal/review petition of appellant within sixty (60) days vide judgment dated 29.04.2019.

In compliance to judgment of Service Appeal No. 245/2017 dated 29.04.2019, the petitioner Mr. Sikandar Ali was heard in person before the CPO Appellate Board on 26.06.2019. From statement of the petitioner and perusal of the available record, it revealed that the dismissal of the petitioner was made due to his willful absence from duty from 06.10.2012 to 17.05.2014 (for a total period of 01 year, 07 months and 11 days) after proper departmental enquiry conducted by DSP/Admin FRP HQrs, Peshawar. During the course of enquiry, the petitioner had submitted to the Enquiry Officer that he was ill. Today, the petitioner told the Board that he was absent due to his return as unqualified recruit from PTC, Hangu. His previous appeal in CPO was rejected being time barred vide No. S/3693/16, dated 10.05.2016. Aggrieved over this order, the petitioner had submitted the instant appeal wherein the Tribunal had ordered to re-decide the appeal/review within 60 days. Today, the petitioner has been given proper opportunity of hearing and defence. His return from PTC Hangu as un-qualified recruit and his willful absence from duties for a period of 587 days are two separate matters. The proper departmental enquiry was conducted against the willful absence of 587 days. At the time of enquiry decision, the petitioner was recruit Constable and was liable to be proceeded under Police Rule 12.21. The Deputy Commandant, FRP had rightly decided the enquiry findings. The CPO Appellate Board has not found any discrepancy in the dismissal order of the Deputy Commandant. After giving proper opportunity of defence and hearing to the petitioner, the Board decided that the authority (Deputy Commandant FRP) has dismissed the Sikandar FC 1278 under Police Rule 12.21; which reveals that the enquiry officer has mixed and matched E&D Rules and Police Rules. Under Police Rule 12.21, a Constable can be discharged and not dismissed.

Therefore, a de-novo enquiry is ordered, for which purpose the Constable is re-instated in service. The period he remained out of service is treated as leave without pay.

This order is issued with the approval by the Competent Authority.

(SADIQ BALOCH) PSP  
AIG/Establishment

For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

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ORDER

In pursuance with directions of Inspector General of Police Khyber Pakhtunkhwa, Peshawar communicated to this office vide CPO memo No. 2404/CPO/IAB/C&E, dated 09.07.2019, the delinquent recruit constable Sikandar Ali No. 1278 be issued a fresh Charge Sheet on the allegations leveled against him. The Charge Sheet alongwith case file be sent to the SP FRP Peshawar Range for the purpose of denovo enquiry. Final outcome of denovo enquiry shall be communicated to CPO Peshawar on or before 23.07.2019, without issuance of formal order for the perusal of Worthy Inspector General of Police. The denovo enquiry shall be conducted in accordance to law/rules.

Being a court matter the proceedings shall be completed within the limitation period to avoid further legal completion.

*DW/O ASI/SBI*  
*Issue a fresh Charge Sheet*  
*of cases*  
*Dy. Com*

*[Signature]*  
COMMANDANT

Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar

No. 5876/77/SI Legal, dated Peshawar the 12/07/2019.

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

1. Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar to issue him a fresh Charge Sheet. His service record alongwith D-file and other relevant papers sent herewith.
2. SP FRP Peshawar Range, Peshawar with directions to conduct proper denovo enquiry against the above named delinquent official within stipulated period and final outcome of enquiry may be sent to CPO Peshawar for the perusal of Worthy Inspector General of Police.

اردو میں تحریر (Urdu)

(45)

تعداد 32 ممبرانہ 6/19

مجلس

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اردو میں تحریر

کامیابانہ 1530 بجے وقت۔ 8/19 کے دن میں اس  
 وقت اور تقریباً 15 بجے وقت اور 19 بجے  
 دن میں ایک ایک نشست 1278 کے دن میں  
 578-77/98 کے دن میں  
 12-7-69  
 DENOVE کے دن میں  
 FRP کے دن میں  
 H.C. کے دن میں

یا علی

نقل کے دن میں

(A) H.C.

MHC FRP/HORS LINI

SHAWAR 05-08-19

(46)

Annex - M

FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

I, Deputy Commandant, FRP, KPK as competent authority do hereby serve you Constable Sikandar No. 1278 of FRP HQs: Peshawar.

(1) i- That consequent upon the completion of enquiries conducted against you by SP FRP-Peshawar Range for which you were given full opportunity of hearing.

ii- On going through the findings/recommendations of the Enquiry Officers, the material available on record and other connected papers I, am satisfied that you have committed the following acts/omissions per Police Rules 1975.

Constable Sikandar No. 1278 of FRP/HQs Peshawar was dismissed from service with effect from 06.10.2012 by the Deputy Commandant FRP KP, Peshawar vide order No. 1371-73/PA dated 22.12.2014 on the charges that he was deputed for Recruit Course at PTC Hangu on 06.10.2012 from where he absented himself from Training and was returned to FRP as un-qualified vide PTC Hangu Signal No. 2562/GC dated 23.10.2012 but he failed to report arrival at FRP HQs: Peshawar and absented from duty wef 06.10.2012 to 17.05.2014 for a total period of 01 year and 07 months. His appeal was rejected vide CPO Order No. S/3693/16 dated 10.05.2016. He approached Khyber Pakhtunkhwa Service Tribunal Peshawar vide appeal No. 245/2017. The Service Tribunal Peshawar remitted the appeal for re-decision of appeal/review of appellant within sixty day vide judgment dated 29.04.2019. In compliance to judgment of service appeal No. 245/2017 the petitioner Mr. Sikandar Ali was heard in person by the CPO appellant board on 26.06.2019. From statement of the petitioner and perusal of the available record it revealed that the dismissal of the petitioner was made due to his willful absence from duty from 06.10.2012 to 17.05.2014 (total period of 01 year and 07 months and 11 days) after proper departmental enquiry conducted by DSP Admn: FRP. During the course of enquiry the petitioner had submitted to the IO that he was ill today, the petitioner told the Board that he was absent due to his return as unqualified recruit from PTC Hangu. His previous appeal in CPO was rejected being time barred. The petitioner filed appeal in KPK Service Tribunal Peshawar which decided in his favour and ordered to re-decide the appeal within 60 days. His was return from PTC Hangu as unqualified recruit course and his willful absence from duties for a period of 587 days are two separate matters. The proper departmental enquiry was conducted against the lawful absence of 587 days. At the time of enquiry decision, the petitioner was recruit constable was liable to be proceeded under Police Rules 12.21. The Deputy Commandant FRP had rightly decided the enquiry findings. The CPO appellant Board has not found any discrepancy in the dismissal order of Deputy Commandant FRP. After giving proper opportunity of defence and hearing to the petitioner, the board decided that the authority (Deputy Commandant FRP) has dismissed the Sikandar FC No. 1278 under Rule 12.21 which reveals that the enquiry officer has mixed and matched E&D Rules and Police Rules 12.21 a constable can be discharged and not dismissed. Therefore de novo enquiry is ordered. In compliance the CPO order constable is re-instated in service. The period he remained out of service is treated as leave without pay. Vide Commandant FRP KP Order No. 5876-77/SI/Legal dated 12.07.2019. He was issued fresh Charge Sheet/Statement of Allegation and SP FRP, Peshawar Range was appointed as Enquiry Officer into the matter. After enquiry he submitted his findings wherein he recommends the said constable for Major punishment.

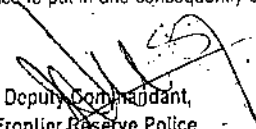
(2) Therefore, I, Deputy Commandant, FRP, KPK as competent authority has tentatively decided to impose upon you Major/Minor penalty including dismissal from service under the said Rules.

(3) You are, therefore, required to Show Cause as to why not the aforesaid penalty should not be imposed upon you.

(4) If no reply to this Final Show Cause Notice is received within the 15 days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and consequently ex-parte action shall be taken against you.

NO-1451/PA

Date-23-09-19

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

گزارش لکھی ہے کہ سیدہ عزیبہ 07/12/2010 کو پولیس میں کھرتی  
 صوا تعلیم B.A تھا۔ سیلاب ذریعہ علاقے کو شہر سے لگا۔ عمر پولیس  
 میں کھرتی تھی وہ لکھی عمر کی حد 25 سے 28 سال لکھی تھی۔ میرے عمر  
 اس وقت تقریباً 6 سے ساکھ (7) مہینے کا مرق تھا۔ ڈی آئی جی صیدا  
 نے میں مجھے 9 مہینے کا ایچ ریگیشن دیا تھا 07/12/2010 کو میرا آڈر بھی آ  
 لکن 05 نے مجھے صید لعل اور پولیس ملیرس کاغذات نہیں دیے اور کیا کہ آپ  
 عمر دیا وہ ہے۔ حالانکہ میرے پاس ڈی آئی جی صید کو آڈر کا ایچ ریگیشن کا  
 تھا۔ کئی بار جانے سے جب میرا کام نہیں بنا تو میں نے لیکچرر صائی کورٹ  
 میں ریٹیشن دے کرک۔ پٹیشن بر 777/2011 جس کے بعد 02-2011 ک  
 لیکچرر صائی کورٹ نے مجھے بحال کر دیا۔ تقریباً 2 مہینے یا 3 مہینے لپو  
 ریٹنگ سنٹر لیا۔ اور وہاں پر 2 مہینے ریٹنگ سنٹر لیا 24/07/2011 کو واپس  
 لیکچرر صید کو آڈر جمع دیا۔ کہ آپ کی عمر دیا وہ ہے۔ حالانکہ میں نے ایچ ریگیشن ڈی  
 آئی جی صید کو آڈر کا ایچ ریگیشن دکھایا تھا۔ اور لیکچرر صائی کورٹ  
 جسٹ آڈر بھی دکھائے۔ لکن اس نے ان سب چیزوں کو نہیں مانا۔

21. آئی جی بی (ایف. آر پی نے  
 کے نام ایسٹو لیا۔ لکھا جس میں لیا گیا کہ یہ بندہ کو صائی کورٹ نے بحال  
 لیا لہذا آپ اس کو ریٹنگ جاری رکھے۔ لکن صکو ٹھانڈٹ نے مجھے واپس بھیج  
 دیا۔ لیکچرر صائی کورٹ (ایف. آر پی صید کو آڈر سے) اور لیکچرر صائی کورٹ نے

13/08/2017

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دائیں زونیا سے جو وہ صاف ٹورٹ کھانڈ مانڈیا لقا اور نہ اچھے

نالا ماہ 13 کو دوبارہ دوبارہ جی ٹی لکھی سنگھ بھنگ دیا گیا۔ نہیں

تیسری گھر کی واپسی کہ گیا۔ کیا

بھنگ دیا۔ پھر 4565 ٹکن ٹانڈنٹ کھنگو بینہ نہیں بھنگ

سارے کیا دیا۔ ٹکی جو اتنا سخت دل بن گیا تھا۔

آری بھنگ دیا گیا۔ میرے ساتھ کھنگو بھنگ دیا۔ اس آد

پے کھنگو ان میں کو رسنگ بھنگے الود گیا۔ رسنگ کے پھٹے میں اور گری کے دوا

میں یہ بھنگ دیا وہ دیر تک نہیں آگے دے 12/09/04 کو ٹانڈنٹ جی ٹی ہی

کے ایک خط بھنگ الود آگے کو پھر پھر (586) کہ ہم ان کو کو رہیں بھنگ

اسٹیشن لکھی آگے۔

لاٹ مارا۔ کو۔ کھنگو اور ڈوسر لادٹ مارا تو ک

اس کے بعد اس میں حافری نہیں 05/10/2017 کو دوبارہ ڈنگ بھنگ بھنگا دینا۔

میں لمانڈ اور اس کے پھر کھنگو بھنگ بھنگ بھنگ بھنگ دینا۔

بھنگ دیا یہ اور صبر کوار کو اور یہ میرا یہ کے ٹانڈنٹ الود آگے

کے بعد بھنگ دیا یہ بھنگ بھنگ بھنگ بھنگ بھنگ بھنگ بھنگ بھنگ

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دنوں کی وجہ سے غیر حاضر ہو گیا۔ جس لوگوں نے مجمعے دئیے دیا  
 پریسن کا مرہ میں بنا دیا۔ جس محلکہ میں میری حاضری نہ  
 دیاں شخواہ نہ ہو۔ وہاں جاے کا کیا مقصد۔ 15 دن کے بجائے ان لوگوں  
 مجمعے تقریباً 18 بجے بعد فون لیا کہ آپ آج حاضر ہوئے۔ 17/05/2014 کو حاضری  
 لیے۔ رپورٹ ریکورڈ کیا اور فیڈ بک میں ڈیوٹی سرانجام دیے۔ 04/07/2014 کو ڈیوٹی  
 ٹرانڈنٹ ایف آئی کو درخواست دیے۔ کہ میں شریب بندہ ہو۔ مجھے شخواہ گھونٹے  
 حکم صادر فرمائیں جس پر ایکشن سے صورت ڈیوٹی ٹرانڈنٹ نے 7/7/2014 کو شخواہ  
 جاری کرنے کا حکم دیا۔ اور میرا شخواہ شارت ہوئی۔ میری سروس فائدہ لیا  
 بن گیا۔ ایجوڈنٹ سروس فائدہ 08/08/2014 اور ایکسپیری ڈیوٹی 08/08/2014  
 ادھر میں نے ڈیوٹی جاری رکھی۔ 22/12/2014 کو ~~میں~~ مجمعے کو شریک سے برصاست  
 کیا گیا۔ لیکن مجمعے پتہ نہیں تھا۔ اور نہ ہی ان لوگوں نے مجمعے کو  
 برصاستی فائدہ دیا تھا۔ حکم بعد پتہ اور معافی ٹورٹ سے دوبادہ شروع  
 کیا۔ ریٹ پینشن فراہم 4452/2014 جسکی جمنٹ فائل میں موجود ہے۔  
 آڈٹ کے بعد میں سروس ریٹرن لیا۔ جسکا سروس اپیل نمبر 245/17  
 ہے۔ اسکی فائی بھی میرے پاس ہے۔ 26/06/2014 کو آئی جی لیٹر  
 صادق بلوچ کے ساتھ پینشن جوا اور ان کو اپنی تساری کیا کی تساری  
 ہم شریب لوگ سے ایسے عوام کی خدمت لیا۔ ہر وقت ایسے جانوں کا قربانی دیے

08/08/2019

~~Handwritten signature~~

Handwritten notes including a phone number: 0315-9313931

Handwritten notes including the number 1278

Handwritten signature

Main body of handwritten text, including a date: 26/07/2019



(9)

خدمت حساب الی آر بی صدر لائبریری

(51)

جناب عالی

میں لیبیری کے لیے مجھے سروس ٹرمینول کے ڈیپو انلوٹری پر  
 کٹا لیا گیا جس میں لیبیری انلوٹری کے لیے کی اور مجھے  
 سٹوفاؤز نوٹس جاری کیے جس میں جواب دیا۔ بعد میں مجھے  
 ڈیپو انلوٹ لبر 1881 دیا گیا اور سیری سٹوفاؤز نوٹس کی اور  
 ڈیپو انلوٹ لبر کی سیریا میں آئی جو اس وقت اسلوی سے ادا کر رہا تھا  
 اور بتایا گیا کہ اس کے لیے آپ کی سٹوفاؤز نوٹس  
 کی جو اب کو مطلع کر دیں گے اس کے بعد ہی دفتر کا جملہ  
 لبروں کی لیبیری سروس کے آج تک کھلیے ہیں یہ بتا نہیں سکتا کہ میں حال  
 میں سٹوفاؤز نوٹس کے لیے آج صبح صبحان سے اللہ سے درخواست کی تھی کہ  
 جملہ لبروں اور مجھے حاضری کا آرڈر فرمایا ہے اس انلوٹری کو  
 مندرجہ

Office of the Addl. IGP/Commandant  
 F.P.K.P. Peshawar  
 Diary No. 295 Ecl  
 Date 31/5/20

SE. Legal  
 For report

Dy. Comdant

الغرض

جناب عالی

FRP 1881

0315-9313931

1720148342531

29/04/2024

Sikand

**ORDER**

This order will dispose of the departmental appeal preferred by Ex-constable Sikandar Ali No. 1278/1881 of FRP HQrs; against the order of Dy. Commandant FRP KP, issued vide order dated 11.10.2019, wherein he was awarded major punishment of removal from service.

Brief facts of the case are that the applicant was appointed as constable on 03.05.2012. He was proceeded against on the allegations that he was deputed for Basic Recruit Course at PTC Hangu where he was absented himself from training program and hence, returned as unqualified vide PTC Hangu signal No. 2562/GC, dated 23.10.2012. In this regard, proper departmental enquiry was initiated against him and awarded major punishment of dismissal from service vide Order Endst; NO. 1371-76/PA, dated 22.12.2014. Later on his departmental appeal was also rejected by the competent authority.

Feeling aggrieved he filed Service Appeal No. 245/2017 before Service Tribunal Peshawar for his reinstatement in service. The Service Tribunal remitted his case for re-decision of appeal/review of the appellant within sixty days vide judgment dated 29.04.2019.

The appellant was reinstated in service for the purpose of denovo enquiry vide this office order Endst; No. 5876-77/Sl Legal, dated 12.07.2019.

In compliance with the order of CPO Peshawar denovo enquiry has been conducted against him through SP FRP Peshawar Range and after completion of denovo enquiry, the Enquiry Officer submitted his findings, wherein the appellant was found guilty of the charges leveled against him and recommended for major punishment.

Thus, he was awarded major punishment of removal from service vide Order Endst; No. 1589-94/PA, dated 11.10.2019.

Feeling aggrieved against the impugned order, the applicant preferred the instant appeal. The applicant was summoned for personal hearing and heard in person in orderly room held on 27.05.2024.

During personal hearing the appellant failed to present any justification with regard to his innocence. Perusal of enquiry file reveals that the allegations were fully established against him during the course of enquiry. His appeal is also found badly time barred about 04 years and more than 05 Months. It is settled proposition of law that law helps the diligent and not indolent. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

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

Order Announced.

*o/c*  
Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar.

No 6133-56 ISI Legal, dated Peshawar the 30/5/2024.

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

1. Accountant/OSI FRP HQrs;
2. SRC/IC Fuji Missal FRP HQrs., His Service Rule/Fuji Missal alongwith D-file sent herewith.
3. Ex-constable Sikandar Ali No. 1278/1881 S/c Ali Khan R/o Village Bara Khel Nowshera Kalan.

یہ سب حساب اسٹیٹس جنرل از بولس علیہ محتویات

حساب عالی

گزارش لکھی ہے کہ میں ایک غریب گھرانے سے

رہنق رکھتا ہوں۔ سروس ٹرینول، ڈیسوانکواترل

پر حال کیا تھا۔ جسکے بعد مجھے محلکوں سے شومار نوٹس

دیے جاتا میں نے جواب دیا۔ میری تنخواہ سٹارٹ

ہوگی۔ میرا سروس مارڈین لیا اور میں اپنی ڈیوٹی

خوس اسٹوپی سے لڑیا دیا۔ کرنس مہینوں سے بعد مجھے

کہا گیا کہ آپ کی تنخواہ بند ہوگئی ہے۔ آپ کے اوپر انکواترل

سٹارٹ ہے۔ جب انکواترل حتم ہو جائی گی۔ ہم آپ کو بتا دے گا

نٹس کی دفعہ دفتر کے کلیرنگاٹا ریا۔ نٹس معلوم نہ ہو سکا۔ کہ میں بحال

ہوں یا درخواست اللہ کی قسم 28/04/2024 تک بحال نہ کیے نوٹس نہیں

دیا۔ جسکے بعد 29/04/2024 کو کمانڈنٹ ایف آئی کو درخواست دی جو کہ

آپ نے ریجسٹر کیا۔ میری ہر ماہ آپ صاحبان کو درخواست

صنت کے ساتھ لکھو ریا ہوں کہ میں غریب ہوں۔ نئی دفعہ عدالت گیا ہوں

وکیل کے پیسے دیے۔ اس پر دراصل تامل بحال ہو جاؤ۔ آپ صاحبان سے

استفسار ہے کہ میں انکو تاخیر دی گھر ہوگا۔ کہ مجھے اپنی نوکری پر

بحال فرما لیجئے۔

الزماریں

سید علی حان

FRP-1881

FRP-1881

سویاٹل - 0315-93132-31

شاختی کارڈ - 17201-4834253

Sikandar

(54)

Answer - 2



6/96 -  
12 22 24  
No. SI 2042

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar  
24, dated Peshawar the 09 / 12 / 2024

To: The Commandant,  
Frontier Reserve Police,  
Khyber Pakhtunkhwa, Peshawar.

Subject: REVISION PETITION.

Memorandum

The Commission Authority has examined and filed the revision petition submitted by Ex-Constable Sikandar Ali No. 1278/1881 of FRP HQs, Peshawar against the punishment of removed from service awarded by Deputy Commandant FRP KP vide order dated 11.10.2019 being badly time barred.

The applicant may please be intimated accordingly.

*[Signature]*

(AFSAR JANI)  
Registrar

For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

SI Legal Rep

For n/a

*[Signature]*

office of commandant FRP KHYBER PAKHTUNKHWA, PESHAWAR.  
No. 8926-28 SI LEARN, dated Peshawar the 20/08/2024.  
copy of the above is forwarded for information &  
further necessary action to the:

- ① OSI FRP WBS: Peshawar
- ② SPC FRP WBS: Peshawar
- ③ I/c Faqri Missal FRP WBS:

*[Signature]*

For Commandant FRP

27/08/2024

*[Signature]*  
27/8/2024

قیمت 50	54445	پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
ایڈوکیٹ: <u>جلال الدین بکر بھٹو</u>		PESHAWAR BAR ASSOCIATION	
بار کونسل ایسوسی ایشن نمبر: 10-7992			
رابطہ نمبر: 03339121558			

بعدالت جناب: چیمبرین سروسز ٹریبونل خدیجہ بخشون ڈولہ

مخانب: <u>ایسٹاٹ</u>	دعویٰ:
<u>کنڈر علی</u> <u>بنام</u> <u>IGP</u>	علت نمبر:
	موضوع:
	جرم:
	تھانہ:

**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام مستحق اور کیلے جلال الدین بکر بھٹو کو ذمیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقریر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے ایسٹاٹ نمبرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ 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 وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا ساتھ پر داخہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جہت اتوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، ایذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: 09/09/2024

العبد سواشد العبد سواشد العبد  
مقام سواشد العبد کے لیے منظور ہے۔

Accepted  
Bakht