

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 4948/2021

Date of Institution ... 16.04.2021

Date of Decision ... 25.01.2022

Syed Rashid Ali Shah, Ex-Constable No. 1928, Capital City Police, Peshawar
Khyber Pakhtunkhwa. ... (Appellant)

VERSUS

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

Ansar Ullah Khan,
Advocate ... For Appellant

Muhammad Adeel Butt,
Additional Advocate General ... For respondents

AHMAD SULTAN TAREEN ... **CHAIRMAN**
ATIQU-UR-REHMAN WAZIR ... **MEMBER (EXECUTIVE)**

JUDGMENT

ATIQU-UR-REHMAN WAZIR MEMBER (E):-

Brief facts of the

case are that the appellant while serving as Constable was proceeded against on the charges of absence from duty and was ultimately dismissed from service vide order dated 20-02-2020, against which the appellant filed departmental appeal dated 20-05-2020, which was rejected vide order dated 03-08-2020. The appellant filed revision petition, which was also rejected vide order dated 17-03-2021, hence the instant service appeal with prayers that the impugned orders dated 20-02-2020 and 17-03-2021 may be set aside and the appellant may be reinstated in service with all back benefits.

02. Learned for the appellant has contended that absence of the appellant was not intentional but was due to serious illness of the appellant, which does not constitute gross misconduct, hence the penalty so awarded is harsh and needs

revision; that the appellant was seriously injured in road accident and he produced all medical prescriptions before the appellate board, but were not taken into consideration; that the appellant has been condemned unheard as no proper inquiry was conducted nor the appellant was associated with proceedings of the inquiry; that the appellant has not been afforded opportunity of personal hearing, hence was condemned unheard; that the impugned orders are arbitrary, discriminatory, against the principle of equity, justice, law and propriety and subject to cancellation by this honorable Tribunal.

03. . Learned Additional Advocate General for the respondent has contended that the appellant is a habitual absentee, having tainted service record containing 43 bad entries, 07 minor punishments on the charges of absence on different occasions in his service; that the appellant was properly proceeded against by issuing him charge sheet/statement of allegations and proper inquiry was conducted; that final show cause notice was also service upon the appellant, but the appellant did not respond either to show cause notice or to proceedings of the inquiry, hence he was awarded with major punishment of dismissal from service.

04. We have heard learned counsel for the parties and have perused the record.


05. It is un-disputed that the appellant remained absent from duty for some time, but the respondents proceeded the appellant in absentia and did not take into consideration his serious illness nor of his wife. the appellant submitted his medical prescriptions as well as of his wife before the inquiry officer as well as before the appellate authority and the inquiry officer has admitted his stance, hence did not recommend him for award of any penalty, but the competent authority arbitrarily dismissed him without taking into consideration his medical grounds, which however was not warranted. It otherwise is mandatory that regular inquiry is must before imposition of major penalty, which however was not conducted in cases of the appellant. The appellant was not treated as per


law, as in case of willful absence, the appellant was required to be proceeded against under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, but the respondents acted in arbitrary manner and dismissed the appellant without adhering to the legal course prescribed by law.

06. The appellant was not guilty of charges of gross misconduct or corruption, therefore extreme penalty of dismissal from service for the charge of absence is on higher side, hence, quantum of the punishment needs to be reduced. Reliance is placed on 2006 SCMR 1120. Charge against the appellant was not so grave as to propose penalty of dismissal from service, such penalty appears to be harsh, which does not commensurate with nature of the charge. The appellant has admitted his absence but such absence was not willful, which does not constitute gross misconduct entailing major penalty of removal from service. Competent authority had jurisdiction to award any of the punishments mentioned in law to the government employee but for the purpose of safe administration of justice such punishment should be awarded which commensurate with the magnitude of the guilt, Otherwise the law dealing with the subject would lose its efficacy. Reliance is placed on 2006 SCMR 1120

07. In view of the foregoing discussion, the instant appeal is partially accepted. The penalty of dismissal from service is converted into minor penalty of stoppage of increments for two years and the intervening period is treated as leave without pay. Respondents however, are at liberty to conduct inquiry, if they so desire. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
25.01.2022


(AHMAD SULTAN TAREEN)
CHAIRMAN


(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

ORDER

25.01.2022


Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the instant appeal is partially accepted. The penalty of dismissal from service is converted into minor penalty of stoppage of increments for two years and the intervening period is treated as leave without pay. Respondents however, are at liberty to conduct inquiry, if they so desire. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED

25.01.2022


(AHMAD SULTAN TAREEM)
CHAIRMAN


(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)

Stipulated period passed reply not submitted.

29.07.2021

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.

Chairman

25.10.2021

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Written reply/comments has not submitted despite extension of 10 days time. Learned AAG seeks further time to submit the same on the next date. Granted but as a last chance. To come up for reply/arguments before the D.B on 30.11.2021.

(MIAN MUHAMMAD)
MEMBER (E)

30.11.2021

Appellant alongwith his counsel present.

Mr. Muhammad Adeel Butt, learned Additional Advocate General alongwith Mr. Raziq H.C for respondents present.

Reply/comments on behalf of respondents submitted which is placed on file and copy of the same is handed over to learned counsel for the appellant. Adjourned. To come up for arguments on 19.01.2021 before D.B.


(Atiq ur Rehman Wazir)
Member (E)

(Rozina Rehman)
Member (J)

14.06.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 25.10.2021 before the D.B.


Appellant deposited
Security & Process Fee

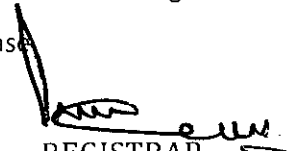


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 4948 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/04/2021	<p>The appeal of Syed Rashid Ali Shah resubmitted today by Mr. M. Zafar Thirkheli, Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please</p> <p style="text-align: right;"> REGISTRAR</p>
2-	27/05/21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>14/06/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Syed Rashid Ali Shah Ex-Constable no. 1928 C.C.P Peshawar received today i.e. on 16/04/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures-A, E and F of the appeal are illegible which may be replaced by legible/better one.
- 2- Appeal has not been flagged/marked annexures' marks.
- 3- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

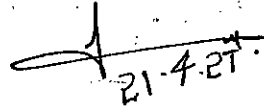
No. 737 /S.T,

Dt. 16/04 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M.Zafar Tahirkheli Adv. Pesh.

Duly Completed & Resubmitted


21-4-21

BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTOONKHWA
PESHAWAR

Service Appeal No. / 2021

Rashid Ali Shah

VERSUS

Govt of Khyber Pakhtunkhwa etc.

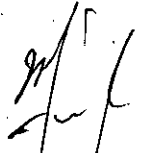
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I N D E X

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S.No	Particulars	Annexure	Dates	Pages
1	Memo of Petition			1-3
2	Impugned Order	"A"	20-02-2020	4
3	Order	"B"	17-03-2021	5
3	Medical Reports	"C" to "C7"		6-13
4	Charge Sheet	"D"	23-08-2019	14
5	Statement of Allegation	"D1"	23-08-2019	15
6	Inquiry Report	"E"	14-09-2019	16-20
7	Show Cause	"E1"	17-01-2020	21
8	Departmental Appeal	"F"	20-05-2020	22
9	Rejection Order	"F1"	03-08-2020	23
10	Appeal to Appellate Board	"F2"	06-08-2020	24-25
11	Vakalatnama			26

Date:- 16 April 2021


(Muhammad Zafar Tahirkheli)
Advocate,
High Court Peshawar


(Ansar Ullah Khan)
Advocate

①

BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTOONKHWA
PESHAWAR

Service Appeal No. 4948 /2021

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 4936
Dated: 16/4/2021

Syed Rashid Ali Shah,
Ex-Constable No. 1928,
Capital City Police, Peshawar Khyber Pakhtunkhwa

..... Appellant

Versus

1. Inspector General of Police,
Government of Khyber Pakhtunkhwa, Peshawar.
2. Superintendent of Police, Cantt Peshawar.
3. Capital City Police Officer, Peshawar.
4. Deputy Superintendent of Police, Cantt Sub Division Peshawar

..... Respondents

=====

**SERVICE APPEAL U/S 4 OF NWFP SERVICE TRIBUNAL ACT, 1974,
AGAINST THE APPELLANT'S DISMISSAL FROM HIS SERVICE VIDE
ORDER DATED 20-02-2020 (ANNEX-A) AND ORDER DATED 17-03-2021,
WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT WAS
REFUSED (ANNEX-B).**

=====

"Prayer"

- (a) By accepting this appeal and setting aside the impugned dismissal order dated 20-02-2020 and impugned order dated 17-03-2021, whereby the Appellate Board of the respondent department finally refused the appellant's appeal.
- (b) Directing the respondent department to re-instate the appellant in service with all the consequential benefits.

Filed to-day

Registrar

16/4/2021

Respectfully Sheweth,

1. The appellant was initially appointed as Constable in the year 2004 and had served the department honestly and diligently to the utmost satisfaction of his superiors.

That while serving as Constable at Police Lines Peshawar in the year 2019, the appellant received call from his wife that she is seriously ill and needed immediate medical attention.

Re-submitted to-day
and filed.

Registrar
16/4/2021

That on the very same day the appellant met a serious motor bike accident and was critically injured while going to purchase medicine for his wife. That being the only male at home, the appellant was unable to report his accident and absence from duties to the official concern within time. (Copies annexed "C" & "C7")

3. That the departmental proceedings were initiated against the appellant, whereby charge sheet and statement of allegation dated 23-08-2019 was issued, which were neither served upon the appellant nor any advertisement issued two widely circulated newspaper as required under the law. (Copies annexed "D" & "D1")
4. That DSP Cantt Sub Division Peshawar was appointed as Inquiry Officer, who submitted his inquiry report dated 14-09-2019. The appellant was then issued final show cause notice dated 17-01-2020, which was never served upon the appellant. (Copies annexed "E" & "E1")
5. That after recovery from injuries, the appellant went to police lines to join his duty, but he was shocked to receive the impugned dismissal order dated 20-02-2020, whereby the appellant was dismissed from his service.
6. The appellant preferred a departmental appeal dated 20-05-2020, which was refused vide order dated 03-08-2020. The appellant approach the appellate Board, respondent No. 1 through filing appeal against the order dated 03-08-2020, which was finally rejected vide impugned order dated 17-03-2021. (Copy of departmental appeal annexed "F" to "F2")

Feeling aggrieved and finding no other remedy, the appellant has been constrained to approach the Hon'ble Services Tribunal for the redress of his grievance, inter-alia on the following:

Grounds

- (a) The respondent department has acted in a most arbitrary manner while dismissing the appellant from service, in-spite of his clean service record, by the respondent department, which needs to be set right by this Hon'ble tribunal.
- (b) The respondent department issued charge sheet along with statement of allegations, but were never served upon the appellant

That the Inquiry Officer did not conduct the inquiry according to the laid down procedure. He was neither called for inquiry proceedings nor was given the opportunity to be heard in person. Impugned dismissal order dated 20-2-2020 is testament to the fact that the appellant was not aware of the inquiry proceedings nor was he served with charge sheet, statement of allegations and final show cause notice. The inquiry report is thus illegal and void an-initio.

- (d) That the Inquiry Officer did not recommend any major penalty in the Inquiry report dated 14-09-2019. This fact has been completely ignored by the respondent No. 2 while issuing impugned dismissal order.
- (e) That the appellant was seriously injured in a road accident and he produced all his medical prescription/receipts as well as his wife's medical reports before the appellate Board, which were not taken into consideration.
- (f) It is necessary to mention that the appellant's correct name is, "**Syed Rashid Ali Shah**" whereas the proceedings have been carried out in the name "**Rashid Hussain**". Ostensibly due to the gross mistake regarding the name the appellant was never properly served and remained ignorant about the whole proceedings.
- (g) That the impugned order of dismissal from service dated 20-2-2020 and then the refusal of his departmental appeal dated 17-03-2021 has been passed in haste, on

the basis of assumptions and presumptions. Hence the impugned orders dated 20-02-2020 and 17-03-2021 are illegal unlawful and liable to be rescinded as such.

- (h) That it has been consistent opinion of the superior courts that, " availing medical leave without permission could not be considered an act of cross misconduct entitling major penalty of dismissal from service" (2008 SCMR 214).
- (i) That whole inquiry proceedings have been carried out against the laid down procedure, whereby the appellant was condemned for no fault or proof of any misconduct or incurring loss to the department.
- (j) The impugned order is thus arbitrary, discriminatory, against the principles of equity, justice, law and propriety, subject to cancellation by this Hon'ble Tribunal.

Appellant seeks permission to take several other grounds at the time of arguments.

In view of the above, it is most humbly requested that by accepting this appeal

- a. The impugned dismissal order dated 20-02-2020 and impugned order dated 17-03-2021, whereby the Appellate Board of the respondent department finally refused the appellant's appeal, may kindly be set aside,
- b. And the respondent department, may kindly be directed to re-instate the appellant in service with all the consequential benefits.

Any other relief deemed appropriate may also be granted

Appellant,

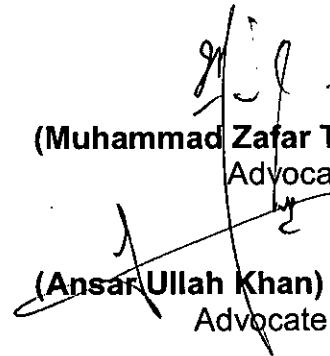


Through,

Peshawar, dated
16-04-2021

(Muhammad Zafar Tahirkheli)
Advocate

(Ansar Ullah Khan)
Advocate



4

ANNEXURE
ANNEXURE

ORDER

This office order will dispose of the departmental proceedings against **Constable Rashid Hussain No. 1928** who while posted at Police Station Tatarra absented himself from his lawful duty with effect from 17.07.2019 to till date.

Under Police Rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation were issued against Constable Rashid Hussain No. 1928 and SDPO Cantt was appointed as enquiry officer to scrutinize the conduct of Constable Rashid Hussain No. 1928.

The enquiry officer submitted finding and stated that the allegations leveled against him is proved. Hence, he was issued final show cause notice, and two parwanas was sent to police station Bhanarian to inform the constable for receiving of final show cause notice. But he did not received final show cause notice nor appear before the undersigned. This shows his lack of interest in official duty and shows negligence. Furthermore, on 01.11.2020 he was relieved from police station Tatarra to PS Sarband but he did not arrived to PS Sarband. On 23.01.2020 relieved him from PS Sarband to Police Lines Peshawar but he did not arrived to Police Lines Peshawar and he is still absent from police Lines Peshawar with effect from 30.01.2020 to till date. He is neither joined enquiry/proceedings nor appeared before the undersigned.

Keeping in view of the above and recommendation of Enquiry Officer, I, Tassawar Iqbal (PSP), SP Cantt, Peshawar being a competent authority, agreed with the recommendation of the enquiry officer. Therefore, **under Police Disciplinary Rules 1975, Constable Rashid Hussain No. 1928** is hereby awarded **major punishment of dismissal from service**, with immediate effect.

CCP
Date: 20-2-2020

(TASSAWAR IQBAL) PSP
SUPERINTENDENT OF POLICE,
CANTT PESHAWAR

No. 514 /SP/Cantt: dated Peshawar, the 21/02/2020.

Copy for information and necessary action to the:-

1. The Sr: Superintendent of Police, Operation, Peshawar.
2. The Superintendent of Police Headquarters: Peshawar.
3. SDPO Cantt enquiry officer.
4. Pay Officer.
5. CRC.
6. OASI branch.
7. Fauji Missal branch with enquiry file for record.
8. Official concerned.

TRUE COPY

SR

ORDER

This order will dispose of the departmental proceedings against Constable Rashid Husain No.1928 who while posted at Police Station Tatara absented himself from his lawful duty with effect from 17.07.2019 to till date.

Under Section rules 1975 (amended 2014) proper charge sheet alongwith summary of allegation were issued against Constable Rashid Hussain No.1928 and SDPO Cantt was appointed as enquiry officer to scrutinize the conduct of Constable Rashid Hussain No.1928

The equity officer submitted finding and stated that the allegations leveled against him is proved. Hence, he was issued Final show Notice, and two parwanas wan sent to police station Bhanamari to inform the constable for receiving of final show cause notice. But he did not received final show cause notice nor appear before the undersigned. This shows his lack of interest in official duty and shows negligence. Furthermore on 01.11.2020 he was relieved from police station Tatara to Police Station Sarband but he did not arrived to Police Station Sarband on 28.01.2020 relieved him from Police Station Sarband to Police Lines Peshawar but he did not arrived to police Lines Peshawar and he is still absent from police Lines Peshawar with effect from 10.01.2020 to till date. He is neither joined enquiry/proceedings nor appeared before the undersigned.

Keeping in view of the above and recommendation of Enquiry Officer, I, Tassawar Iqbal (PSP), SP Cantt, Peshawar being a competent authority, agreed with the recommendation of the enquiry officer. Therefore, Under Police Disciplinary, Rules 1975, Constable Rashid Hussain No.1928 is hereby awarded Major punishment of dismissal from service, with immediate effect.

Sd/-
TASSAWAR IQBAL PSP
SUPERINTENDENT OFFICER
CANTT PESHAWAR

No.514/SP/Cantt. dated Peshawar, the 21/12/2020

Copy of information and necessary action to the

1. The Sr. Superintendent of Police, Operation, Peshawar
2. The Superintendent of Police Headquarter, Peshawar
3. SDPO Cantt, enquiry officer
4. Pay Officer
5. CRC,
6. OASI, Branch
7. Fauji Missal branch with enquiry for record.
8. Official concerned.



ANNEXURE
OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

No. S/ 1181 /21, dated Peshawar the 17/3 /2021.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1976 (amended 2014) submitted by Ex-FC Syed Rashid Ali Shah No. 1928. The petitioner was dismissed from by SP/Cantt: Peshawar vide OB No. 581, dated 20.02.2020 on the allegations of absence from duty w.e.f 17.07.2019 till date of dismissal from service i.e. 20.02.2020 for 07-months & 03-days. His appeal was rejected by Capital City Police Officer, Peshawar vide order Endst No. 919-24/PA, dated 03.08.2020.

Meeting of Appellate Board was held on 02.03.2021 wherein petitioner was heard in person. Petitioner contended that he was injured in road accident.

During hearing petitioner failed to advance any plausible explanation in rebuttal of the charges. Moreover, he produced medical documents during personal hearing before CCPO, Peshawar which were sent for verification in which only two OPD chits, one for himself and the other in the name of his wife were verified and the rest has not been verified and reportedly bogus. In view of the willful absence of petitioner for long period, the Board decided that his petition is hereby rejected.

Sd/-

KASHIF ALAM, PSP

Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. S/ 1190 /21,

Copy of the above is forwarded to the:

1. Capital City Police Officer, Peshawar. One Fauji Missal and one Enquiry file of the above named Ex-FC received vide your office Memo: No. 21112/CRC, dated 11.12.2020 is returned herewith for your office record.
2. Supdt: of Police, Cantt: Peshawar.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
5. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

MISSING COPY

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

6

ANNEXURE C



ACCIDENT & EMERGENCY DEPARTMENT
LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KP

MRNo. K02ACE19638160

Gender : Male

Age : 36 Years

Fathe Name/ GUL ZAR KHAN

Amount Paid :20

Invoice # : K02192246750

Invoice Date 30-JUL-2019 14:30:32

Name :RASHID ALI SHAH

District : Peshawar

Visit type: Acute Emergency Department Emergency

Complaints:

Operator HAZRAT BILAL

RX

Center: Emergency

Findings:

Back pain is most
often caused by a kidney
infection. Stomach
tubes coming out of
your back
Back pain is left your
flank which is the
area either side your
spine is the base of
your ribbed ribs

Investigations:

Acd :-

CBC

LFTS

RFTS

X-Ray - KUB

Diagnosis:

Next Visit:

Tab: Novalat 500mg
جی 5 - 1 x 1 x 1

Tab: Augmentin 625mg
جی 3 x 1 x 1 x 1

Tab. Paracetamol
لیٹ 6, 6

TRUE COPY

Orthopedic opinion
knee pain that is worse in the
morning and improves during the day
the glen develops at the site of
previous injury after typhoid

Consultant Name: Dr. Amjad Ali
Orthopedic

Signature: DR SARHAD KHAN
Associate Professor & HOD
FCPS (Urology)
MCh, LRH Peshawar
Bed rest 20 days

9



ACCIDENT & EMERGENCY DEPARTMENT
LADY READING HOSPITAL

MEDICAL TEACHING INSTITUTION Paid : 20
PESHAWAR, KP

Invoice #: K02192246750
Invoice Date: 30-JUL-19 14:30:32

MRNo : K02ACE19638160 Name : RASHID ALI SHAH
Gender: Male Age : 35 Year(s) District : Peshawar
Father / Husband Name : GUL ZAR KHAN

Visit Type : Acute Emergency Department : EMERGENCY

Operator : HAZRAT BILAL
Complaints:

RX

Counter : EMERGENCY

Findings:

To knee pain

B. Augmentin 675
1 + 1

B. PPIEX
1 + 1

Investigations:

The MR# ACE19638160
was issued to Rashid
Ali Shah on 30/7/2019
checked and verified
from HANIS software
found correct

B. LOMIS 100

Bed Rest

Diagnosis:

Next Visit:

Consultant Name:

Signature:

TRUE COPY

7



ACCIDENT & EMERGENCY DEPARTMENT
LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KP

Amount Paid : 20
Invoice # : K02201126312
Invoice Date : 22-JUL-20 12:44:41

MRACF20404053 Name : SYED RASHID
Wife Age : 39 Year(s) District : Peshawar
Husband Name : GULZAR KHAN

Complaints: Acute Emergent Department : EMERGENCY
NAVEED HAMEED Counter : EMERGENCY

medial meniscus

Findings:

Right Symple 550g
1st 1st
2nd 2nd
3rd 3rd
4th 4th
5th 5th
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7th 7th
8th 8th
9th 9th
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97th 97th
98th 98th
99th 99th
100th 100th

Investigations:

Diagnosis:

Next Visit: _____ Consultant Name: _____ Signature: _____

S. R. R. R.
TRUE COPY

9

ANNEXURE C

Dr. Khalid Mehmood Khan Qureshi
Orthopaedic Surgeon
MBBS, MCPS, FCPS
Govt. Lady Reading Hospital Peshawar.



ڈاکٹر خالد محمود خان قریشی
آرتھوپیڈک سرجن

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس
گورنمنٹ لیڈی ریڈنگ ہسپتال پشاور

CLINIC : Room No. C-16, Khushal Medical Center
Dabgari Garden Peshawar.
Mob: 0346-9213195, 0345-7643021

Name Rashid Ali Malik Age 35 Sex (M) Date 12/06/2018

Clinical Record

Prx

Handwritten notes on the left side of the page, including 'Prx' and other illegible scribbles.

B. PTBx

No. 1+1

B. Qufous

B. QALSA

No. 1+1

B. NERON

No. 1+1

B. Therapou ulty

TRUE COPY

Handwritten notes: 'MRI Lt. knee', 'July e. Report', and a signature.

verified

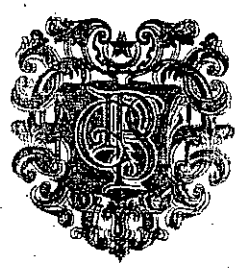
Dr. Khalid Mehmood
MBBS, MCPS, FCPS
Orthopaedic Surgeon
General Hospital & Teaching Institute

Senior Prof. Consultant Orthopaedic Surgeon
Dr. Khalid Mehmood
MBBS, MCPS, FCPS
Traumatologist & Hip Surgeon
MRC General Hospital & Teachings Institute

Not Valid For Medical Legal Purposes

کلینک: کمرہ نمبر C-16 خوشحال میڈیکل سنٹر ڈبگری گارڈن پشاور

Assistant Professor
Dr. Khalid Mehmood Khan Durashi
 Orthopaedic Surgeon
 M.B.B.S, MCPS, FCPS (Ortho)
 MMC General Hospital &
 Teaching Institute
 X Consultant orthopedic Surgeon LRH Peshawar
 Clinic: Room No B-9, 2nd Floor
 Khushal Medical Center, Dabgari Garden
 Peshawar.



اسٹنٹ پروفیسر
ڈاکٹر خالد محمود خان قریشی
 آرٹھو پیڈک سرجن
 ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس (آرٹھو)
 فیلوشپ ان آرٹھو پلاسٹی (Arthroplasty) ڈراما اینڈ (Iizarov) سرجن
 ماہر امراض ہڈی، جوڑ، ہڈ، عرق النساء، کمر درد
 ایم ایم سی جنرل ہسپتال اینڈ ٹیچنگ انسٹیٹیوٹ، ایکس کنسلٹنٹ آرٹھو پیڈک سرجن LRH پشاور

Name: Rashid Ali Shah Age: 28 yr Sex: (M) Date: 1/3/2021

16 Clinical Record

Rec

4
 Sn Pan
 Smelly I.
 Sn 2012
 MI → on
 MRI

to motion
 1+1
 to muscle
 to Flexion
 1+1

Review
 → not
 report

Act - physio therapy (Q cards / Hand)
 - light exercises

TRUE COPY

Asst. Prof. / Consultant Orthopaedic Surgeon
Dr. Khalid Mehmood
 MBBS, MCPS, FCPS
 Traumatologist & Iizarov Surgeon
 MMC General Hospital & Teaching Institute

Not Valid for Medical Legal Purposes

9-9379426
 -7643021 راجہ نمبرز

کلینک: کمرہ نمبر B-9، سیکنڈ فلور خوشحال میڈیکل سنٹر، ڈبگری گارڈن پشاور

11

ANNEXURE C5

pakhtunkhwa

Open MRI

3

MBF

Govt. ... Hosni

Reg. No	:	Patient Age.	: Years
Patient Name	: Rashid	Sex.	: M
Performed Date	:	Report Date	: 13th June 2018
Patient Ref. By	:		

MRI RIGHT KNEE JOINT

REASON FOR EXAM:

COMPARISON: None

EXAMINATION TECHNIQUE:

Multiplanar multisequential imaging is done through the right knee.

FINDINGS:

Grade III tear involves posterior horn of medial meniscus. The bones comprising of the right knee joint show normal configuration and position. The bone marrow signal is normal, with a normal trabecular pattern. The anterior and posterior cruciate ligaments are intact and are normal in their width and signal characteristics. Medial meniscus demonstrate normal signal. No tear / injury is seen. The medial and lateral collateral ligaments are within limits. The articular cartilage is normal. The patellar and quadriceps tendons are normal. Hoffa's fat pad appears normal. There is no evidence of significant effusion. The soft tissue surrounding the right knee joint and the imaged vascular structures are unremarkable.

IMPRESSION:

Grade III horizontal tear posterior horn of medial meniscus.

TAHIR MALIK

MS. Interventional Radiologist.

S.P. Rashid
TRUE COPY

Email: pakhtunkhwamri@gmail.com Contact: 091-2581591

DR. MEHNAZ GUL

MBBS, RMP

Gynaecologist

Clinic Timings:

9:00 am to 5:00 pm

Cell: 0335-9541580

PMDC No: 34072-P

ڈاکٹر مہناز گل

ایم بی بی ایس، آرا ایم پی

گائنا کالوجسٹ

Name:

W/O Rashid

Age

Date

2/9/19

Clinical Record

Box

10
9/2 0
3/2 72

Dec 27

Aug 12/14

2-M.P

11/6/19

4
P
Bleeding
2 days

Tars

Duphaston 20
10

W/O

Tars

F. Acid 12

W/O

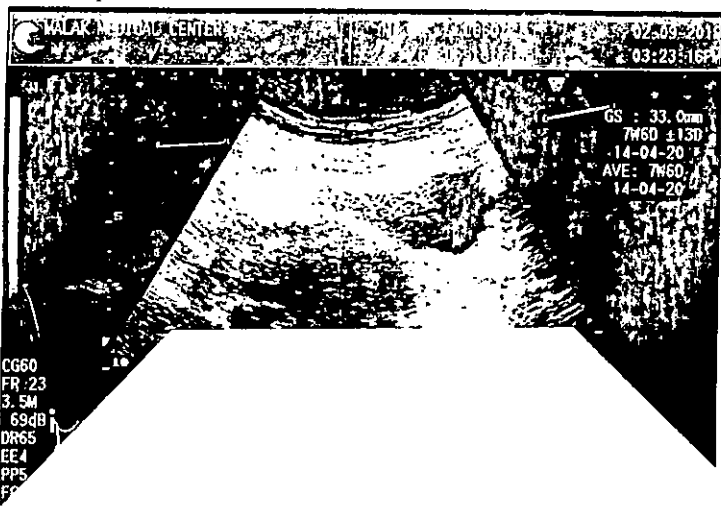
It has been confirmed that Mrs. Rashid came for checkup on 27/6/19 for 25/6/20

DR. MEHNAZ GUL
M.B.B.S. R.M.P.
Gynaecologist

TRUE COPY

7/6/19
P
R

2/9/19



No

Lie

Presentation

FCA NA FA

Liquor

Placenta

3.3cm FW 6d

CRP

MSD

PL

F.L.D.P

Any abnormality

Review after
1 week
[Signature]

[Signature]
TRUE COPY

DR. MEHNAZ GUL

MBBS, RMP

Gynaecologist

Clinic Timings:

9:00 am to 5:00 pm

Cell: 0335-9541580

PMDC No: 34072-P

ڈاکٹر مہناز گل

ایم بی بی ایس، آرا ایم پی

گائنا کالوجسٹ

Name:

W/o Rasheed

Age

Date

4/9/19

Clinical Record

Box

Follow up visit

Tab

Prosoctec 20

20mg

(7)

1-1-1

Dr

12/1/19

Tab

20mg

(10)

4/9/19

1-1-1

Bleeding

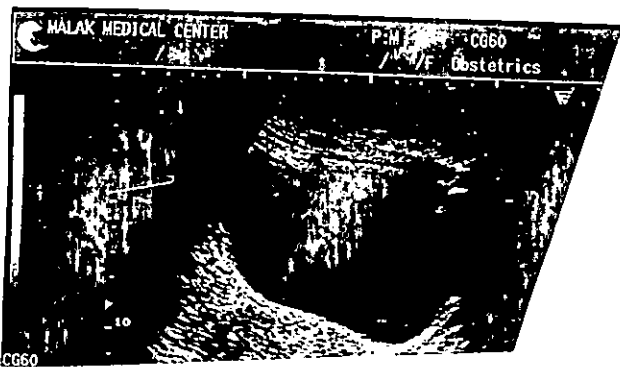
Pain not

25/6/20

DR. MEHNAZ GUL
MBBS, RMP
Gynaecologist
TRUE COPY

DR. MEHNAZ GUL
MBBS, RMP
Gynaecologist

4/9/19



al USG

Lie _____
 Presentation _____
 FCA _____ FM _____
 Liquor _____
 Placenta _____
 G. Sa. _____ G. Age _____
 CRI _____ G. Age _____
 R. I. D. _____ G. Age _____
 L. I. _____ G. Age _____
 E. D. D. _____
 Any Abnormality _____

Ab. Bulky Uterus

Sign _____

Echogenic areas in the cavity

ovaries normal

▷ R. A. O. U. ?? ✓

CHARGE SHEET

(14)

ANNEXURE (1)

18

I, Superintendent of Police, Cantt., Capital City Police Peshawar, as a competent authority, hereby, charge that FC Rashid Hussain No. 1928 of Capital City Police Peshawar with the following allegations.

"You FC Rashid Hussain No. 1928 while posted to PS Tatara remained absent from lawful duty w.e.f 17.07.2019 to till date without permission from your senior. This amounts to gross misconduct on your part and against the discipline of the force."


You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the Enquiry Officer committee, as the case may be.

Your written defence, if any, should reach the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that have no defence to put in and in that case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person.

A statement of allegation is enclosed.


MUHAMMAD ASHFAQ
SUPERINTENDENT OF POLICE,
CANTT. PESHAWAR


S. Rashid
TRIP COPY

DISCIPLINARY ACTION

ANNEXURE 'D'
15


I, Superintendent of Police, Cantt., Capital City Police Peshawar as a competent authority, am of the opinion that FC Rashid Hussain No. 1928 has rendered him-self liable to be proceeded against under the provision of Police Disciplinary Rules-1975.

STATEMENT OF ALLEGATION

"That FC Rashid Hussain No. 1928 while posted to Police Station Tatara remained absent from his lawful duty w.e.f **17.07.2019** to till date. This amounts to gross misconduct on his part and against the discipline of the force.

For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and Dsp Lantji is appointed as Enquiry Officer.

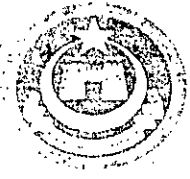
2. The Enquiry Officer shall, in accordance with the provisions of the Ordinance, provide reasonable opportunity of hearing to the accused officer, record his finding within 30 days of the receipt of this order, make recommendations as to punishment or other appropriate action against the accused.
3. The accused shall join the proceeding on the date time and place fixed by the Enquiry Officer.


MOHAMMAD ASHFAQ
SUPERINTENDENT OF POLICE,
CANTT, PESHAWAR

No. 225 /E/PA, dated Peshawar the 23/8 /2019.

1. Dsp Lantji is directed to finalize the aforementioned departmental proceeding within stipulated period under the provision of Police Rules-1975.
2. Official concerned


TRUE COPY



OFFICE OF THE
DEPUTY SUPERINTENDENT OF POLICE,
CANTT: SUB-DIVISION, PESHAWAR.
No. 179 /P.A, dated Pesh: the 14/08/20

(16) E
ANNEXURE
(17)

To: The Superintendent of Police,
Cantt. Peshawar,

Subject: DEPARTMENT ENQUIRY AGAINST FC RASHID HUSSAIN NO. 1928, AT
PS TATARA, PESHAWAR.

Kindly refer to your office Endst: No. 225/E/PA, dated 23.08.2019 on the subject noted above.

STATEMENT OF ALLEGATIONS

Short facts of the enquiry are that FC Rashid Hussain No. 1928, while posted at PS Tatara Peshawar remained absent from his lawful duties w.e.f 17.07.2019 to till date, vide DD No. 26 dated 17.07.2019. This amounts to gross misconduct on his part and against the rules of discipline force.

The accused Constable was Charge sheeted, summary of allegations was issued to him and the undersigned was appointed as enquiry officer.

PROCEEDINGS.

During the course of enquiry the defaulter Constable was called to the office he came to the office on 11.01.2020 and handed over charge sheet and summary of allegation and also heard in person, who furnished their reply as under.

STATEMENT OF FC RASHID HUSSAIN NO. 1928 PS TATARA:

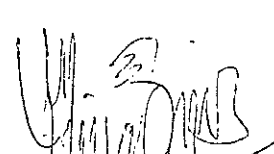
He stated in his statement that he was performing his duty efficiently but unfortunately he injured in the Motorcycle incident, which was converted to sever illness, due to which he absented for the aforementioned period. He did not given a single charge of complaint to the high-ups and will be careful in future. He added that he will produce medical documents later on, he requested that the aforementioned period may kindly be treated as medical leave and requested that enquiry against him may kindly be filed without any further proceedings.

FINDINGS/RECOMMENDATIONS.


In light of the above facts, statement of the defaulter constable it is apprised that the defaulter constable was absented for 17.07.2019 till date and did not made his arrival report, due to illness, but he neither follow proper procedure nor produced any medical documents, while he stated that he will provide his medical documents as soon as possible. Hence, enquiry report is submitted herewith for suitable orders, if agreed.

Submitted please.

TRUE COPY


DEPUTY SUPERINTENDENT OF POLICE,
CANTT: SUB-DIVISION, PESHAWAR.

P.S
Issue final show
cause notice


SP



OFFICE OF THE
 DY SUPERINTENDENT OF POLICE,
 CANTT: SUB-DIVISION, PESHAWAR.
 No. 3851/P.A, dated Pesh: the 27/09/2019.

17

The SHO PS Tatara,
 Peshawar.

28

Subject: SUMMON NO. 1

Memo:

It is bringing into your notice that this office is initiating departmental proceeding against Constable Rashid Hussain No. 1928 in which his written statement is required to finalize the departmental proceedings.

It is therefore, inform the said official to attend this office on 30.09.2019 at 11:30 AM and his signature/thumb impression ought to be sent to this office, in case of non-compliance, MASI will be responsible. (پہلے اس پر تھام کی ہر خبر برقرار رکھو)

TRUE COPY
 S.R. Khan

H. M. Ali
 PA to DSP Cantt,
 Peshawar.

(19)

آرڈر دفتر ڈی ایس پی کینٹ سب ڈویژن

(29)

نمبر 19 پی اے
موری 03/01/20

جناب SHO صاحب تھانہ تانا مارا حسب احکم جناب DSP کینٹ صاحب کنہیل اراشد حسن 1928

مطلع کیا جائے کہ بسلسلہ انکوائری پیشی وصولی کے لیے مورخہ 06-01-2020 بوقت 11:00 بجے دفتر بڈا باوردی حاشمہ ہو جائے
نوٹ:- بعد از تعمیل دستخط شدہ پروانہ واپس ارسال کریں۔

حکام علی
پی اے نو DSP کینٹ پشاور۔

سید R
TRUE COPY

312

20

صدا علی

گنجل رشیدین 1928 کو 7 نومبر 11/19

کو تمام خدایہ تمام سیدہ رولانہ کسکے ہیں
اور رشیدین کے

(DSP)

all

04-01-2020

TRUE COPY

Form No. 466 PA-COPO
19-05-2020

(9)

20-5-2020

حاجی علی ا

گزارش کے مسائل سال 2004، کو محکمہ پولیس نے روز میں بطور کنٹریول بھجوا دیا تھا۔ بعد میں ڈیوٹی
 مسائل نے اپنی ڈیوٹی نہایت ایمانداری، ترضخ شناسی سے لے کر مختلف تعاقبات اور مارشل
 انجام دیتا رہا۔ سال 2019ء میں مسائل کو پولیس لائٹنرنگ ور میں ڈیوٹی سرانجام دینا تھا کہ
 گھر سے اطلاع ملی کہ مسائل کی زبردستی بیمار ہے مسائل گھر خود آجائے۔ اس اطلاع پر مسائل
 جی دن کی سہائشی پر گھر خود چلا گیا۔ مسائل صبح کوھاٹ میروزی کا رہائشی سکونت یافتہ
 ہے۔ زبردستی ڈاکٹر مہ کو دکھایا جس نے علاوہ معالج اور آرام کا مشورہ دیکر رخصت کیا۔ مسائل
 زبردستی ڈاکٹر لائے کی خاطر کوہر مائیکل پر جا رہا تھا کہ جو مسائل کیس میں مسائل گرا اور کچھ معمولی
 جوشیں جیہ گھٹنے میں شدید جوٹ آئی۔ اس گھٹنا میں مسائل کو 3 سال پہلے ہی
 ایکسڈنٹ میں زخمی ہوا تھا دوبارہ جوٹ لگنے سے مسائل کیلئے کافی مشکلات درپیش
 ہوئی۔ ڈاکٹر مہ نے نوب معائنہ علاوہ معالج جاری رکھنے اور بعد چند ماہ ڈوائی کھانے کے آپریشن
 کا مشورہ دیا۔ چونکہ مسائل اپنے گھر کا واحد خسر وار ہے والا مہ ہینٹ ہے جبکہ ایک بیٹا حاجی
 ذہنی طور پر بیمار ہے اس لیے مسائل کے حالات و واقعات جانے بچھائیے پر بروقت نہ جمع کیے
 مسائل غیر حاضر تصور ہوا اور جھام اردو ریز 514 مجاہدہ میں ہی کینٹین لے کر جوہ 20-2-21 کو
 تحریک سے برضاہت کر دیا گیا۔ مسائل کی پوسٹنگ اس وقت تھا سریندر میں تھی۔

بلکہ معروضات کی روشنی میں عرض رسا ہوں کہ مسائل کی غیر جانبداری خود مسائل کی بیماری بعد زبردستی
 بیماری ہے۔ کاغذات بیماری کف پوراہ۔ دیگر کوئی وجہ نہیں۔ مسائل ایک غیر بااثر نوجوان
 والا شخص ہے۔ دیگر کوئی ذریعہ معاش نہیں ہے۔ سرکاری نوکری بھی والا ذریعہ معاش تھا
 جو کہ مسائل بعد ایل و عدیاں کی خوشحالی کی ضمانت تھا۔ اس کے بعد روانہ ہوئے کہ مسائل
 کو دوبارہ لٹری پر بحال فرمادیں۔ تاکہ تحق بعد ایل و عدیاں ہی جو سے خدمت کر سکیں۔

تقریر 19-05-2020

الحاجی علی ا

سید راشد علیہا سائبہ پولیس کنٹریول 1928 ضلع لہور

0314-7975013
0314-7975051

DSP 86
Legal

For comments
 M. R. Ali
 M. R. Ali
 20/5

TRUE COPY



(23) ANNEXURE F.
OFFICE OF THE
CAPITAL CITY POLICE OFFICER
PESHAWAR

Phone No. 091-9210989

Fax No. 091-9212597

ORDER.

This order will dispose of the departmental appeal preferred by Ex-Constable Syed Rashid Ali Shah No.1928 who was awarded the major punishment of "Dismissal from service" by SP/Cantt: Peshawar vide OB No.581, dated 20-02-2020.

2- The allegations leveled against him were that he while posted at Police Station Tatara absented himself from his lawful duty w.e.from 17-07-2019 till the date of dismissal i.e 20-02-2020 for a total period of 07 months and 03 days without leave or permission from the competent authority.

3- He was served Charge Sheet and Summary of allegations by SP/Cantt: Peshawar and SDPO Cantt: Peshawar was appointed as enquiry officer to scrutinize the conduct of delinquent official. The enquiry officer after conducting proper enquiry submitted his findings and stated that the allegations stands proved. The competent authority i.e SP/Cantt: Peshawar after perusal of enquiry report issued him Final Show Cause Notice through local Police at his home address but failed to submit his reply to the Final Show Cause Notice. He neither joined enquiry/ proceedings nor appeared before the competent authority hence awarded the above major punishment.

4- He was heard in person in O.R. The relevant record along with his explanations perused. During personal hearing he produced some medical documents to cover his absence which was sent to SP/HQrs Peshawar for verification from concerned quarters. The SP/HQrs reported that only two OPD chits, one for himself and the other in the name of his wife were verified but the rest has not been verified and reportedly bogus. Therefore, keeping in view his record which contains 43 bad entries and 07 minor punishments, his appeal to set aside the punishment order awarded to him by SP/Cantt: Peshawar vide OB No.581, dated 20-02-2020 is hereby rejected /dismissed.

Muhammad
(MUHAMMAD ALI KHAN)PSP
CAPITAL CITY POLICE OFFICER
PESHAWAR.

No. 919-24 /PA dated Peshawar the 03-08-2020

Copies for information and n/a to the:-

1. SP/Cantt: Peshawar.
2. Pay Officer/ CRC, OASI
- ✓ 3. FMC along with FM
4. Official concerned.

S. Rashid
TRUE COPY

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

ORDER

This order will dispose of the departmental Appeal preferred by Ex-constable Syed Rashid Ali Shah No.1928 who was awarded the major punishment of "Dismissal from service" by SP/Cantt; Peshawar vide OB No.581, dated 20.02.2020.

2- The allegation leveled against him were that he while posted at Police Station Tatara absented himself from his lawful duty w.e.from 17.07.2019 till the date of dismissal i.e. 20.02.2020 for a total period of 07 months and 03 days without leave or permission from the competent authority.

3. He was served charge sheet and Summary of allegations by SP/Cantt. Peshawar and SDPO Cantt. Peshawar was appointed as enquiry officer to scrutinize the conduct of delinquent official. The enquiry officer after conducting proper enquiry submitted his findings and stated that the allegations stands proved. The competent authority i.e. SP/Cantt. Peshawar after perusal of enquiry report issued him Final Show Cause Notice through Local Police at his home address but failed to submit his reply to the Final Show Cause Notice. He nether joined enquiry/proceedings nor appeared before the competent authority hence awarded the above major punishment.

4- He was heard in person in O.R. The relevant record along with his explanations perused. During personal hearing he produced some medical documents to cover his absence which was sent to SP/HQrs Peshawar for verification from concerned quarters. The SP/HQrs reported that only two OPD chits, one for himself and the other in the name of his wife were verified but the rest has not been verified and reportedly bogus. Therefore, keeping in view his record which contains 43 bad entries and 07 minor punishment, his appeal to set aside the punishment order awarded to him by SP/Cantt. Peshawar vide OB No.581, dated 20.02.2020 is hereby rejected /dismissed.

Sd/-
(MUHAMMAD ALI KHAN) PSP
CAPITAL CITY POLICE OFFICER
PESHAWAR

No.919-24//PA dated Peshawar the 03-08-2020

Copies for information and n/a to the:-

1. SP/Cantt. Peshawar
2. Pay Officer/CRC, OASI
3. FMC alongwith FM
4. Official concerned.

خدمت جناب انسپٹر جنرل آف پولیس ضلعہ خٹو خواہ صاحب، لہور۔

آپیل برائے بحالی نوکری

جناب عالی!

موردبانہ گزارش ہے کہ سائل 2004ء کو حکمہ پولیس میں بطور کانسٹیبل تعینات ہوا تھا۔ بدوران ملازمت سائل نے اپنی ڈیوٹی نبھانے اور ایف آئی آر، فرض شناسی میں شہادت کے مختلف تعاقبات اور کارروائیوں میں انجام دیا۔ سال 2018ء میں سائل پولیس لکھنؤ شہاد میں ڈیوٹی سہرا انجام دے رہے تھے کہ کچھ سے اطلاع ملی کہ سائل کی زوجہ سہرا ہے۔ اور سائل کچھ خود آجائے۔ اس اطلاع پر سائل 02 دن رخصت پر کچھ خود چلا گیا۔ سائل صنلع کو تعاقبات میں رزق کارآمد تھی اور سہرا بھی باسٹرنہ ہے۔ سائل نے اپنی زوجہ کو ڈاکٹر صاحبہ کے پاس لفظی علاج معالجہ کیا۔ اور ڈاکٹر صاحبہ نے لہذا رخصت سے واپس آ کر علاج معالجہ کیا۔ اور آرام کا مشورہ دیا۔ رخصت سے سائل کی زوجہ کی دوائی لانے کی خاطر سائل کے ساتھ ساتھ ساتھ ایک نرس بھی لیا اور سائل کو کھینے میں شدید جھوٹ لگی جبکہ یہ کھینے 03 سال پہلے ہی لکھنؤ میں زخمی ہوا تھا۔ دوبارہ جھوٹ لگنے سے سائل کو کافی مشکلات درپیش آئی۔ ڈاکٹر صاحبہ نے بعد از معائنہ و علاج معالجہ دوائی جاری رکھنے اور چند ماہ بعد آپریشن کرنے کا مشورہ دیا۔ چونکہ سائل کچھ کا واپس ذوق دار جبکہ واپس سہرا بھی ضعیف العمر اور بڑھاپے کی عمر میں بھی رہے۔ بدیں وجہ سائل کے حالات و واقعات جانے لگے تھے۔ بدین وقت نہ نہیں تھا۔ اور سائل غیر حاضر تصور کیا جا کر بحالہ آڈر نمبر 514 جاری ہوئی ہے کہ کھینے شہاد عرصہ 2020-2-1 کو حکمہ لکھنؤ میں درخواست کر دیا گیا۔ سائل کو سہرا سے اس وقت واپس لکھنؤ میں لایا جائے۔

بخدمت جناب انسپکٹر جنرل آف پولیس خیبر پختونخوا صاحب پشاور

اپیل برائے بحالی نوکری

جناب عالی!

مودبانہ گزارش ہے کہ سائل 2004 کو محکمہ پولیس میں بطور کنسٹیبل بھرتی ہوا تھا بدوران ملازمت سائل نے اپنی ڈیوٹی نہایت ایمانداری، فرض شناسی اور پشاور کے مختلف تھانوں اور گاردات میں انجام دیتا رہا، سال 2018ء میں سائل پولیس لائنز پشاور میں ڈیوٹی سرانجام دے رہا تھا کہ گھر سے اطلاع ملی کہ سائل کی زوجہ بیمار ہے اور سائل گھر خود آجائے اس اطلاع پر سائل 2 دن کی رخصت پر گھر خود چلا گیا سائل ضلع کوہاٹ میروزی کارہائشی اور سکونتی باشندہ ہے سائل نے اپنی زوجہ کو ڈاکٹر صاحب کے پاس بغرض علاج معالجہ لے گیا اور ڈاکٹر صاحب نے بعد از معائنہ و علاج معالجہ سائل کی زوجہ کو آرام کا مشورہ دیکر رخصت کیا سائل زوجہ کی دوائی لانے کی خاطر موٹر سائیکل پر جا رہا تھا کہ موٹر سائیکل پھسل گیا اور سائل کو گھٹنے میں شدید چوٹ لگی جبکہ یہ گھٹنہ 3 سال پہلے بھی ایکسیڈنٹ میں زخمی ہوا تھا دوبارہ چوٹ لگنے سے سائل کو کافی مشکلات درپیش آئی، ڈاکٹر صاحب نے بعد از معائنہ و علاج معالجہ دوائی جاری رکھنے اور چند ماہ بعد آپریشن کرنے کا مشورہ دیا چونکہ سائل گھر کا واحد ذمہ دار جبکہ والد صاحب ضعیف العمر اور بڑا بھائی ذہنی طور پر بیمار ہے بدیں وجہ سائل کے حالات و واقعات جائے تعیناتی پر بروقت نہ پہنچ سکے اور سائل غیر حاضر تصور کیا جا کر بحوالہ آرڈر نمبر 514 مجاریہ ایس پی کینٹ پشاور مورخہ 21/2/2020 کو محکمہ ہذا سے برخاست کر دیا گیا سائل کی پوسٹنگ اس وقت تھانہ سربند میں تھی۔

عزت بزرگ سے درخواست ابالاء معد و صفاٹ کی روشنی میں عمر پان رساں نول کی
 سائل کی غیر حاضر نما خود سائل کی بیماری اور زوجہ کی بیماری ہے۔ کاغذات بیماری
 لف ہے۔ دستر اور کوئی وجہ نہیں ہے۔ سائل کی غیر با امد ایال نول والا شخص
 جبہ گھر کا واحد کفیل ہے۔ امد سائل کا اور کوئی ذریعہ معاش نہیں ہے
 سرکاری فوری یہی واحد ذریعہ معاش تھا۔ جو کہ سائل اور ایال و عیال کی
 خوشحالی کی ضمانت تھا۔ اسلئے پھر روانہ غور فرمائے سائل کو دوبارہ فوراً
 بحال فرمادیں۔ تاکہ حکمہ اور ایال و عیال کی معر سے فرت کر سکیں۔
 سائل تا صیافت دعا گوہ رہے گا۔

الغرض! اللہم

کفیل سردار مشرف علی شاہ سابق لوئیس کنسلر جرنل 1928

0314-7975013

0314-7975051

6/8/2020

TRUE COPY
اللہم

54-LB

20-5-2020

اپیل برائے بحالی نوکری

جناب عالی!

گزارش ہے کہ سائل سال 2004 کو محکمہ پولیس پشاور میں بطور کنسٹیبل بھرتی ہوا تھا بدوران ڈیوٹی سائل نے اپنی ڈیوٹی نہایت ایمانداری، فرض شناسی سے پشاور کے مختلف تھانہ جات اور گاردات انجام دیتا رہا سال 2019 میں سائل پولیس لائنز پشاور میں ڈیوٹی سرانجام دیں رہا تھا کہ گھر سے اطلاع ملی کہ سائل کی زوجہ بیمار ہے سائل گھر خود آجائے اس اطلاع پر سائل 2 کی شباشی پر گھر خود چلا گیا سائل ضلع کوہاٹ میروزی کارہائشی سکونتی باشندہ ہے زوجہ کو ڈاکٹر صاحب کو دکھایا جس نے علاج و معالجہ اور آرام کا مشورہ دیکر رخصت کیا سائل زوجہ کی دوائی لانے کی خاطر موٹر سائیکل پر جا رہا تھا کہ موٹر سائیکل پھسل کر سائل گرا اور کچھ معمولی چوٹیں جبکہ گھٹنے میں شدید چوٹ آئی اس گھٹنا میں سائل کو 3 سال پہلے بھی ایکسیڈنٹ میں زخمی ہوا تھا دوبارہ چوٹ لگنے سے سائل کیلئے کافی مشکلات درپیش ہوئی ڈاکٹر صاحب نے بعد معائنہ علاج معالجہ جاری رکھنے اور بعد چند ماہ دوائی کھانے کے آپریشن کا مشورہ دیا چونکہ سائل اپنے گھر کا واحد ذمہ دار ہے والد صاحب ضعیف ہے جبکہ ایک بڑا بھائی ذہنی طور پر بیمار ہے اور بحوالہ آرڈر نمبر 514 مجاریہ ایس پی کینٹ پشاور مورخہ 20-2-21 کو محکمہ سے درخواست کر دیا گیا سائل کی پوسٹنگ اس وقت تھانہ سربند میں تھی۔

بلا معروضات کی روشنی میں عرض رساں ہوں کہ سائل کی غیر حاضری خود سائل کی بیماری اور زوجہ کی بیماری ہے کاغذات بیماری لف ہمراہ۔ دیگر کوئی وجہ نہیں، سائل ایک غریب بال بچوں والا شخص ہے دیگر کوئی ذریعہ معاش نہیں ہے سرکاری نوکری ہی واحد ذریعہ معاش تھا جو کہ سائل اور ایل و عیال کی خوشحالی کی ضمانت تھا اس لئے ہمدردانہ غور فرما کر سائل کو دوبارہ نوکری پر بحال فرمادیں، تاکہ محکمہ اور ایل و عیال کی پھر سے خدمت کر سکوں۔

تحریر 19-05-2020

العارض

سید راشد علی شاہ سابق پولیس کنسٹیبل نمبر 1928 ضلع پشاور

0314-7975051-0314-7975013

VAKALATNAMA

In the Court of

Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No. 749/2016

Petitioner
Plaintiff
Applicant
Appellant
Complainant

Syed Rashid Ali Shah

Decree-Holder

In the Court of

VERSUS

Service

Respondent
Defendant
Opponent
Accused

Govt of KP etc

Judgment-Debtor

I / We **Syed Rashid Ali Shah** the above noted Petitioner / Appellant do hereby appointed and constitute, **Muhammad Zafar Tahirkheli & Ansar Ullah Khan, Advocates High Court**, to appear, plead, act, compromise, withdraw or refer to arbitration for me / us as my / our counsels / advocates in the above noted matter, without any liability for his default and with the authority to engage any other Advocate / Counsel at my / our cost.

The Client / Litigant will ensure his presence before the Court on each and every date of hearing and the counsel would not be responsible if the case is proceeded ex-parte or is dismissed in default of appearance. All cost awarded in favour shall be the right of Counsel or his nominee, and if awarded against shall be payable by me/us.

I / We authorize the said Advocates to withdraw and receive on my / our behalf all sums and amounts payable or deposited on my / our account in the above noted matter.

S. Rashid

Client

M. Zafar Tahir

Attested & Accepted (Advocates)

Ansar Ullah Khan

Dated 16-04-2021

Office

ATIQ LAW ASSOCIATES,
87, Al-Falah Street, Besides State Life Building,
Peshawar Cantt, Phone: 091-5279529
E-mail : zafartk.advocate@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.4948 /2021.

Ex- Constable Syed Rashid Ali Shah No.1928 of CCP Peshawar..... **Appellant.**

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others. **Respondents.**

REPLY BY RESPONDENTS NO. 1, 2, 3&4.

Respectfully Sheweth:-

PRELIMINARY OBJECTIONS:-

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
3. That the appellant has not come to Hon'able Tribunal with clean hands.
4. That the appellant has no cause of action and locus standi.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appellant has concealed the material facts from Honorable Tribunal.
7. That the appeal is not maintainable being devoid of any merit.

REPLY ON FACTS:-

- (1) Correct only to the extent that the appellant was appointed as constable in the year 2004 in the respondent department, while rest of para is denied on the ground that the appellant is a habitual absentee. He has not a clean service record and contains 43 bad entries, 07 minor punishments and 01 major punishment on the charges of absence on different occasions in his service. Record shows that he was an unwilling and unprofessional officer, thereby not interested in discharging of his official duties. (copy of bad entries list annexure as "A")
- (2) Incorrect. The appellant while posted at Police Station Tatara Peshawar absented himself from official and lawful duty w. e. from 17.07.2019 till the date of dismissal from service i.e 20.02.2020 (total 07 months and 03 Days) without prior permission or leave from the competent authority. In this regard he was issued charge sheet with statement of allegations which was served upon him. SDPO Cantt: Peshawar was appointed as enquiry officer. The enquiry officers finalized the enquiry and submitted findings report, wherein the allegations of wilful absence were proved against him. After receipt of the findings report, Final Show Cause Notice was issued to him and sent him on home address, but he avoided to appear and defend himself. After observing all codal formalities, he was awarded major punishment of dismissal from service. (copy of charge sheet, statement of allegations, enquiry report, Final Show Cause Notice are annexure as B,C,D,E)

- (3) Incorrect. Charge sheet with statement of allegations was served upon him, to which he replied but his reply was found unsatisfactory. The appellant was treated as per law/rules.
- (4) Incorrect. Regular inquiry was conducted and thereafter he was issued a final show cause notice and sent him at home address through local police but he avoided to appear/ submit his written reply. Hence after fulfilling all the codal formalities he was awarded the major punishment of dismissal from service.
- (5) Incorrect. The competent authority before imposing the major punishment had completed all codal formalities and an ample opportunity of self defense was provided, but appellant being not interested in his official duty remained continuously absented from lawful duty for long period without any leave.
- (6) Incorrect. The appellant filed departmental appeal, which was thoroughly processed and an ample opportunity of hearing was provided to appellant by appellate authority but appellant failed to defend himself with plausible/justifiable grounds, but his appeals were found unsatisfactory and meritless, hence rejected and filed.

That appeal of the appellant being devoid of merits may be dismissed on the following grounds.

REPLY ON GROUNDS:

- (a) Incorrect. Para is totally incorrect. In fact the appellant deliberately absented from his lawful duty for long absence period. After fulfilling all the codal formalities, he was awarded the major punishment of dismissal from service. As per record the appellant is a habitual absentee and contains 43 bad entries, 07 minor punishments and 01 major punishment on the charges of absence on different occasions in his service.
- (b) Incorrect. Proper charge sheet with statement of allegation was issued to him to which he receive personally and also replied, but his reply was found unsatisfactory. The appellant was associated with the enquiry proceedings. Proper opportunity of defense was provided to the appellant, but he failed to defend himself.
- (d) Incorrect. As per Apex Court judgment and law, the Competent Authority is not bound to follow the recommendation of the enquiry officer rather the Competent Authority should apply his own independent mind and to decide the issue in accordance with the material available on record.
- (e) Incorrect. During personal hearing the appellant produced some medical documents which were sent for verification from concerned. After verification 02 chits one for himself (appellant) and the other in the name of his wife were verified and the remaining two chits were found bogus.(copy is annexure as G)
- (f) Incorrect and denied on the solid grounds that all the members of the disciplined force have been allotted constabulary numbers who are known and dealt with by the number

allotted to the individual on which complete data and record of the member is maintained.

- (g) Incorrect. Infact the appellant willfully absented himself from lawful duty without any prior permission or leave. The appellant is a habitual absentee and not interested in official duty and enjoying his long absence period without any leave permission. After fulfilling all the codal formalities, he was awarded the major punishment of dismissal from service. The punishment orders are just legal and have been passed in accordance with law/rules and liable to be upheld.
- (h) Incorrect. Being a member of a disciplined force, the appellant was well aware about the proceedings. However he deliberately absented from his lawful duty without leave /permission. Therefore, the punishment order was passed by competent authority in pursuance of his long absence period which is not tolerable in the disciplined force.
- (i) Incorrect. The whole enquiry proceedings were initiated purely on merit and in accordance with law/rules. The appellant availed the opportunities of defense, but he failed to defend himself. The appellant being a member of disciplined force, committed gross misconduct.
- (j) Incorrect. The competent authority before imposing the major punishment had completed all codal formalities and an ample opportunity of self defense was provided, but appellant being not interested in his official duty remained continuously absented from lawful duty for long period without any leave.

Respondents also seek permission of this Honorable Tribunal to raise additional grounds at the time of arguments.

PRAYER.

It is therefore most humbly prayed that in light of above facts and submissions, the appeal of the appellant being devoid of merits and legal footing, may kindly be dismissed with costs please.


Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.


Capital City Police Officer,
Peshawar.


Superintendent of Police,
Cantt: Peshawar.


Deputy Superintendent of Police,
Cantt: Sub Division Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.4948 /2021.

Ex- Constable Syed Rashid Ali Shah No.1928 of CCP Peshawar..... **Appellant.**

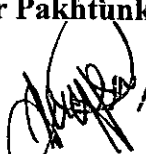
VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others. **Respondents.**

AFFIDAVIT.

We respondents 1, 2, 3 and 4 do hereby solemnly affirm and declare that the contents of the written reply are true and correct to the best of our knowledge and belief and nothing has concealed/kept secret from this Honorable Tribunal.


**Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.**


**Capital City Police Officer,
Peshawar.**


**Superintendent of Police,
Cantt: Peshawar.**


**Deputy Superintendent of Police,
Cantt: Sub Division Peshawar.**

A

1. **Name of Official** SY'ED RASHID ALI SHAH NO.1928 GULZAR KHAN
R/O Moh: Postal Colony Kohat Road PS Bannamari District.
Peshawar.
2. **Date of Birth** 28.07.1980
3. **Date of enlistment** 26.10.2004
4. **Education** **BA**
5. **Courses Passed** **Recruit**
6. **Total qualifying service** 14 years, 05 Months & 05 days.
7. **Good Entries** **Nil**
8. **Punishment (previous)**

6

Bad Entries (L.W.O Pay, E/Drill & Warning)

1. 01 day leave without pay vide OB No.837 dt: 05.06.2009
2. 15 days leave without pay vide OB No.674 dt: 24.04.2009
3. 07 days leave without pay vide OB No.782 dt: 19.305.2009
4. 01 day leave without pay vide OB No.566 dt: 30.03.2009
5. 07 days leave without pay vide OB No.328 dt: 19.02.2009
6. 02 days leave without pay vide OB No.759 dt: 15.05.2009
7. 04 days leave without pay vide OB No.24 dt: 31.01.2009
8. 03 days leave without pay vide OB No.1307 dt: 03/12/2008
9. 02 days leave without pay vide OB No.1194 dt: 13.11.2008
10. 01 day leave without pay vide OB No.86 dt: 01.02.2008
11. 01 day leave without pay vide OB No.141 dt: 26.02.2008
12. 01 day leave without pay vide OB No.97 dt: 07.02.2008
13. 06 days leave without pay vide OB No.13 dt: 07.01.2008
14. 01 day leave without pay vide OB No.101 dt: 06.02.2006
15. 01 day leave without pay vide OB No.1127 dt: 26.12.2006
16. 01 day leave without pay vide OB No.722 dt: 25.07.2006
17. 01 day leave without pay vide OB No.482 dt: 31.05.2006
18. 01 day leave without pay vide OB No.952 dt: 17.10.2006
19. 02 days leave without pay vide OB No.948 dt: 14.10.2006
20. 03 days leave without pay vide OB No.519 dt: 19.03.2009
21. 01 day leave without pay vide OB No.841 dt: 02.09.2008
22. 01 day E/drill vide OB No.4611 dt: 31.12.2012
23. 01 day E/drill vide OB No.3790 dt: 16.10.2012
24. 03 days leave without pay vide OB No.1923 dt: 3.05.2013
25. 04 days leave without pay vide OB No.806 dt: 28.02.2013
26. 06 days leave without pay vide OB No.4574 dt: 28.12.2012
27. 03 days leave without pay vide OB No.216 dt: 15.01.2013
28. 51 days leave without pay vide OB No.1348 dt: 23.04.2014
29. 67 days leave without pay vide OB No.3934 dt: 15.12.2014
30. 08 days leave without pay vide OB No.3576 dt: 21.01.2012
31. 13 days leave without pay vide OB No.3223 dt: 16.09.2013
32. 03 days leave without pay vide OB No.3573 dt: 02.10.2012
33. 01 day E/dill vide OB No.135 dt: 12.01.2015
34. 03 days E/drill vide OB No.3957 dt: 17.12.2014
35. 04 days E/drill vide OB No.639 dt: 16.02.2015
36. 01 day E/drill vide OB No.4300 dt: 21.12.2016
37. 01 day E/drill vide OB No.4347 dt: 26.12.2016
38. 06 days leave without pay vide OB No.4417 dt: 06.12.2017
39. 01 day E/drill vide OB No.396 dt: 29.01.2018
40. 34 days leave without pay vide OB No.3385 dt: 05.11.2018
41. 21 days leave without pay vide OB No.4050 dt: 28.12.2018
42. 20 days leave without pay vide OB No.290 dt: 22.01.2019
43. 13 days leave without pay vide OB No.791 dt: 01.03.2019

Minor Punishment

7

1. Censured vide OB No:177 dt: 17.02.2007
2. Censured vide OB No.461 dt: 20.04.2007
3. 12 days leave without pay & Censured vide OB No:788 dt: 15.08.2008
4. Stoppage of one year annual increment without cumulative effect vide OB No.1494 dt: 04.04.2017
5. Censured vide OB No.657 dt: 15.02.2018
6. Stoppage of one year annual increment without cumulative effect & Cesured vide OB No.1149 dt: 26.03.2018
7. Two years approved service forfeiture vide OB No.1900 dt: 18.06.2019

Major Punishment

1. Removed from service on the charge of absence 46 days vide OB No.701 dt: 12.07.2007 by Deputy Commandant FRP Peshawar & Reinstaed in service and his absence period is treated as medical leave vide order No.55535-38/OASI, dt: 31.10.2007 by Commandant FRP Peshawar.

09. Punishment (Current)

- Awarded the major punishment dismissed from service on the charged of absence w.e.from 17.07.2019 to till date vide OB No.581 dated 20.02.2020 by SP/Cantt: Peshawar.

10. Leave Account

<u>Total leave at his credit</u>	<u>Availed leaves</u>	<u>Balance</u>
692 days	30	662 Days

PA
My
23/6

CRC
22/6

W/CCPO

B

18

CHARGE SHEET

I, Superintendent of Police, Cantt., Capital City Police Peshawar, as a competent authority, hereby, charge that **FC Rashid Hussain No. 1928** of Capital City Police Peshawar with the following allegations.

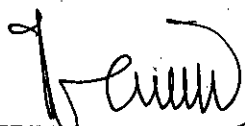
“You **FC Rashid Hussain No. 1928** while posted to PS Tatara remained absent from lawful duty w.e.f **17.07.2019 to till date** without permission from your senior. This amounts to gross misconduct on your part and against the discipline of the force.”

You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the Enquiry Officer committee, as the case may be.

Your written defence, if any, should reach the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that have no defence to put in and in that case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person.

A statement of allegation is enclosed.



MUHAMMAD ASHFAQ
SUPERINTENDENT OF POLICE,
CANTT, PESHAWAR

29/7

(310)

سید امین خان شہد و سولہ

S. Rashed
11-1-2020

DISCIPLINARY ACTION

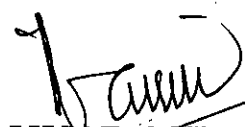
I, Superintendent of Police, Cantt., Capital City Police Peshawar as a competent authority, am of the opinion that **FC Rashid Hussain No. 1928** has rendered him-self liable to be proceeded against under the provision of Police Disciplinary Rules-1975.

STATEMENT OF ALLEGATION

"That **FC Rashid Hussain No. 1928** while posted to Police Station Tatarā remained absent from his lawful duty w.e.f **17.07.2019 to till date**. This amounts to gross misconduct on his part and against the discipline of the force.

For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and Dsp Lantji is appointed as Enquiry Officer.

2. The Enquiry Officer shall, in accordance with the provisions of the Ordinance, provide reasonable opportunity of hearing to the accused officer, record his finding within 30 days of the receipt of this order, make recommendations as to punishment or other appropriate action against the accused.
3. The accused shall join the proceeding on the date time and place fixed by the Enquiry Officer.


MOHAMMAD ASHFAQ
SUPERINTENDENT OF POLICE,
CANTT, PESHAWAR

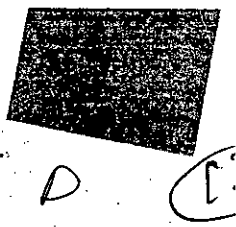
No. 225 /E/PA, dated Peshawar the 23/8 /2019.

1. Dsp Lantji is directed to finalize the aforementioned departmental proceeding within stipulated period under the provision of Police Rules-1975.
2. Official concerned

27/1



OFFICE OF THE
DEPUTY SUPERINTENDENT OF POLICE,
CANTT: SUB-DIVISION, PESHAWAR.
No. 179 /P.A, dated Pesh: the 14/01/2020.



To: The Superintendent of Police,
Cantt. Peshawar.

Subject: DEPARTMENT ENQUIRY AGAINST FC RASHID HUSAIN NO. 1928, AT PS TATARA, PESHAWAR.

Kindly refer to your office Endst: No. 225/E/PA, dated 23.08.2019 on the subject noted above.

STATEMENT OF ALLEGATIONS

Short facts of the enquiry are that FC Rashid Hussain No. 1928, while posted at PS Tatara Peshawar remained absent from his lawful duties w.e.f 17.07.2019 to till date. vide DD No. 26 dated 17.07.2019. This amounts to gross misconduct on his part and against the rules of discipline force.

The accused Constable was Charge sheeted. summary of allegations was issued to him and the undersigned was appointed as enquiry officer.

PROCEEDINGS.

During the course of enquiry the defaulter Constable was called to the office he came to the office on 11.01.2020 and handed over charge sheet and summer of allegation and also heard in person, who furnished their reply as under.

STATEMENT OF FC RASHID HUSSAIN NO. 1928 PS TATARA.

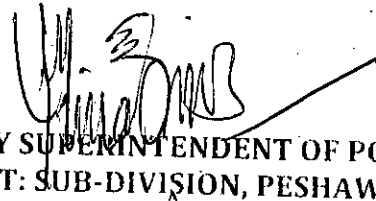
He stated in his statement that he was performing his duty efficiently but unfortunately he injured in the Motorcycle incident, which was converted to sever illness, due to which he absented for the aforementioned period. He did not given a single change of complaint to the high-ups and will be careful in future. He added that he will produce medical documents later on. He requested that the aforementioned period may kindly be treated as medical leave and requested that enquiry against him may kindly be filed without any further proceedings.

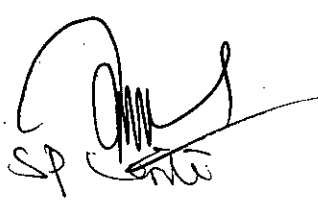
FINDINGS/RECOMMENDATIONS.

In light of the above facts, statement of the defaulter constable it is apprised that the defaulter constable was absented for 17.07.2019 till date and did not made his arrival report, due to illness. but he neither follow proper procedure nor produced any medical documents, while he stated that he will provide his medical documents as soon as possible. Hence, enquiry report is submitted herewith for suitable orders, if agreed.

Submitted please.

P.S
Issue final show
cause notice


DEPUTY SUPERINTENDENT OF POLICE,
CANTT: SUB-DIVISION, PESHAWAR.


SP

E

FINAL SHOW CAUSE NOTICE

I **Superintendent of Police, Cantt, Capital City Police, Peshawar** as **competent authority**, under the provision of Police Disciplinary Rules 1975 do **hereby serve you FC Rashid Hussain No. 1928** of Capital City Police, Peshawar as follows. (16)

1 (i) That consequent upon the completion of enquiry conducted against you by the enquiry officer for which you were given opportunity of hearing.

(ii) On going through the findings and recommendation of the enquiry Officer, the material on record and other connected papers produced before the E.O.

I am satisfied that you have committed the following acts/omissions specified in Police Disciplinary Rules 1975 of the said Ordinance.

"That you **FC Rashid Hussain No. 1928** while posted at PS Tatara, Peshawar were absent from **17.07.2019 to till date** without taking permission or leave. This act amounts to gross misconduct on your part and against the discipline of the force"

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of major punishment under Police Disciplinary Rules 1975 for absence willfully performing duty away from place of posting.

3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

4. If no reply to this notice is received within 7 days of its delivery, in normal course of circumstances, it shall be presumed that you have no defence to put in and in that case as ex-parte action be taken against you.

5. The copy of the finding of the enquiry officer is enclosed.

(TASSAWAR IQBAL) PSP
SUPERINTENDENT OF POLICE
CANTT: PESHAWAR

No. 164 /PA, SP/Cantt: dated Peshawar the 17/01/2020

Copy to official concerned