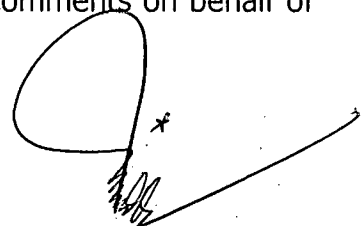


15.08.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General alongwith Mr. Farhan Superintendent for respondents No. 1 & 2 present. None present on behalf of respondent No. 3.

Reply/comments on behalf of respondents No. 1 & 2 submitted which are placed on file. Copy of the same is handed over to learned counsel for the appellant. Reply/comments on behalf of respondent No. 3 are still awaited. Notice be issued to respondent No. 3 for submission of reply/comments. Adjourned. To come up for reply/comments on behalf of respondent No. 3 before the S.B on 27.09.2022.

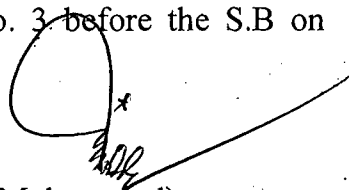


(Mian Muhammad)
Member (E)

27.09.2022

Clerk of learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General alongwith Mr. Farhan Superintendent for the respondents present.

Reply/comments on behalf of respondents No. 1 & 2 have already been submitted. Reply/comments on behalf of respondent No. 3 are still awaited. Learned Assistant Advocate General seeks time to contact respondents No. 3 for submission of reply/comments. Last opportunity is granted. Adjourned To come up for reply/comments on behalf of respondent No. 3 before the S.B on 03.11.2022.




(Mian Muhammad)
Member (E)

22.04.2022

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant has been serving in the respondent-department as Mali (BS-03) since 22.01.2019 and who is aggrieved of the impugned order dated 10.06.2021 whereby major penalty of "dismissal from service" was imposed on him by respondent No.2. His departmental appeal dated 29.06.2021 was turned down on 28.12.2021 by respondent No.1. Where-after, he approached the Khyber Pakhtunkhwa Service Tribunal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. It was further argued that the appellant has not been treated according to law. He has neither been issued a charge sheet/statement of allegations nor regular enquiry conducted against him. He has therefore, been condemned unheard before awarding the major penalty of "dismissal from service".

The appeal is admitted to regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for submission of reply/comments. To come up for reply/comments on 23.06.2022 before S.B.


(Mian Muhammad)
Member(E)

23rd June, 2022

Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Additional AG for respondents present.

Respondents have not submitted written reply/comments. Learned AAG seeks time for submission of written reply/comments. To come up for written reply/comments on 15.08.2022 before S.B.



(Kalim Arshad Khan)
Chairman

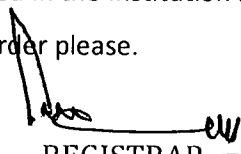
Rs-500/-
Appellant Deposited
Security & Process Fee
A. J. J. J.
12/5/22

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 597/2022 _____


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/04/2022	<p>The appeal of Mr. Muhammad Naveed resubmitted today by Mr. Abdur Rauf Khan Ghouri 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-		

appeal of Mr. Muhammad Naveed Mali received today i.e. on 26.01.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓ 1- Check list is not attached with the appeal.
- ✓ 2- Memorandum of appeal may be got signed by the appellant.
- 3- Appeal may be supported by with an affidavit duly attested by the Oath Commissioner.
- 4- Certificate be given to the effect that the appellant has not filed any service appeal earlier on the subject matter before this Tribunal.
- 5- Annexures of the appeal may be attested.
- 6- Appeal has not been flagged/marked with annexures marks.
- ✓ 7- Address of the appellant is in complete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- ✓ 8- Necessary party may be made in the heading of the appeal.
- ✓ 9- Pay slip attached with the appeal is illegible which may be replaced by legible/better one.
- ✓ 10- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- ✓ 11- Copies of charge sheet, statement of allegations, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- ✓ 12- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- ✓ 13- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent may also be submitted with the appeal.

No. 177 /S.T,

Dt. 27/01 /2022


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Kashif Iqtidar Khalil Adv. Pesh.

To, The Registrar S.T,

It is to inform that the Petitioner is ill and is tested for Covid. It is humbly requested that time may be granted for file completion.

Kashif Iqtidar Advocate. 11/02/2022

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 601

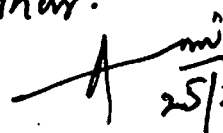
Dated 21-4-22

5 days time further extended.

To, THE REGISTRAR S.T

IT IS TO INFORM THAT THE APPLICANT IS QUARANTINE DUE TO CORONA TIME MAY KINDLY BE GRANTED.

MORE 15 DAYS TIME EXTENDED FURTHER.


25/2/22

On request of Learned Counsel for the appellant, more 15 days are extended further to complete & resubmit the appeal.

Amy
14/4/22
ASSISTANT REGISTRAR
Khyber Pakhtunkhwa
Service Tribunal Peshawar

14/4/22

Sir Resubmitted with date
of the request that the app-
ellant was fell seriously
ill, as evidenced in the print-
ed annexures of medical
documents, therefore this
case remained un-submitted
till the require era hence
seek condonation of -
delay. So ple while condo-
ning the case more time
pleas be also extended to
the appellant in the interest
of justice.

ASV

BEFORE THE HON'BLE KHYBER PAKTUNKHWA

SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 577-P/2022

Muhammad Naveed, Mali (BPS-3)

Versus

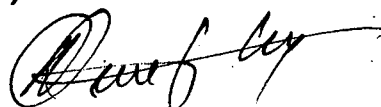
Secretary, Pakistan Forest Institute and others

INDEX

S.No.	Description of Documents	Annexure	Pages
1.	Appeal alongwith Affidavit <i>Address of Parties</i>		1-5 S-A
2.	Copy of Appointment Order	"A"	6-7
3.	Copy of Pay Slip	"B"	8
4.	Copy of CNIC	"C"	9
5.	Copy Show Cause Notice dated 03.05.2021	"E"	10-12
6.	Copy of Office Order dated 10.06.2021	"F"	13
7.	Copy of Departmental Appeal dated 29.06.2021	"G"	14-17
8.	Copy of Medical Reports and Laboratory Tests	"H"	18-25
9.	Copy of Departmental appeal Order dated 28.12.21	"I"	26-28
10.	Wakalatnama		29

Appellant,

Through,



Abdul Rauf Khan Ghouri

Advocate, High Court

①

BEFORE THE HON'BLE. KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. ____-P/2022

Muhammad Naveed, Mali (BPS-3),
Pakistan Forest Institute, Peshawar.

.....**Appellant**

Versus

1. **Secretary,**
Forestry Environmental and wild life Department,
Peshawar.
2. **Director General,**
Pakistan Forest Institute, Peshawar.
3. **Chief Conservator,**
Pakistan Forest Institute, Peshawar.

.....**Respondents**

APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT, 1974 AGAINST
THE DEPARTMENTAL ORDER DATED
28.12.2021.

(7)

PRAYER:

On acceptance of this appeal the impugned Order dated 10.06.2021 of Secretary PEW may kindly be set aside and the appellant be reinstated with all previous benefits in the best interest of justice.

Respectfully Sheweth:

1. That the appellant is serving as a Mali (BPS-3) at Pakistan Forest Institute and was appointed on 22.01.2019.
2. That his conduct was best to the satisfaction of the colleagues and other officials.
3. That there was neither any complaint nor any report was against him in all due service time in the department.
4. That due to some domestic and family circumstances he had panic attacks and got severe illness of depression for which he was treated in different hospitals under specialist doctors. **(Medical Reports are annexed with the appeal).**

(3)

5. That mean while appellant was admitted for his treatments a show cause notice was issued by DG PFI on 28.03.2021 with many false allegations and penalty of dismissal from service.
6. That it was astonishing that further he was terminated from the service without any reason and proof hence the present appeal on the following grounds amongst other:

GROUND:-

- A. That the appellant has been proceeded unjustifiably without any ground reality.
- B. That the appellant was not served properly neither show cause notice nor statement of allegations were ever served.
- C. That the establishment code formalities were neither adopted while serving the notices neither publication was ever made in the newspapers.
- D. That the appellant was condemned unheard which does not stands in the eyes of law.

(4)

It is, therefore, most humbly prayed that on acceptance of this appeal the impugned Order dated 10.06.2021 of Secretary PEW may kindly be set aside and the appellant be reinstated with all previous benefits in the best interest of justice.

Appellant,

Through,



Abdul Rauf Khan Ghouri

Advocate, High Court,
Peshawar

Cell No. 0316-9405550

Certificate:

It is certified that as per instruction of appellant no such like Appeal has earlier been filed on the subject matter by the appellant.



Advocate

5

BEFORE THE HON'BLE KHYBER PAKTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. ____-P/2022

Muhammad Naveed, Mali (BPS-3)

Versus

Secretary, Pakistan Forest Institute and others

AFFIDAVIT

I, **Muhammad Naveed, Mali (BPS-3), Pakistan Forest Institute, Peshawar**, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

NIC No.17301-0407971-3

Cell No. 0332-9361937

Identified by:



Abdul Rauf Khan Ghouri

Advocate, High Court,
Peshawar



5A

BEFORE THE HON'BLE KHYBER PAKTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. ____-P/2022

Muhammad Naveed, Mali (BPS-3)

Versus

Secretary, Pakistan Forest Institute and others

ADDRESS OF PARTIES

APPELLANT:

Muhammad Naveed, Mali (BPS-3),
Pakistan Forest Institute, Peshawar.

RESPONDENTS:

4. **Secretary,**
Forestry Environmental and wild life Department,
Peshawar.
5. **Director General,**
Pakistan Forest Institute, Peshawar.
6. **Chief Conservator,**
Pakistan Forest Institute, Peshawar.

Appellant,

Through,



Abdul Rauf Khan Ghouri

Advocate, High Court



(6)

GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, PESHAWAR
Ph: +92 91 9221224, 9216995, Fax: +92 91 9221233



(SAY NO TO CORRUPTION)

No. 100 /F.VI(247)-Estt

Dated 22 / 11 / 2019

SUBJECT: APPOINTMENT AGAINST THE POST OF MALI (BPS-03) AT PFI, PESHAWAR AGAINST QUOTA RESERVED FOR GOVERNMENT SERVANTS WHO DIED DURING SERVICE UNDER RULE 10 (4) OF KHYBER PAKHTUNKHWA CIVIL SERVANTS (APPOINTMENT, PROMOTION & TRANSFER) RULES 1989

On the recommendation of the Departmental Selection Committee and on the approval of Competent Authority, Mr. Muhammad Naveed S/o Zahoor-ul-Hassan is hereby offered appointment to the post of Mali (BS-03) in the Pakistan Forest Institute, Peshawar, against quota reserved for government servants who died during service under rule 10 (4) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules 1989, on the following terms and conditions:-

- a. The post of Mali is in (BS-03) and carries pay scale of Rs. (9,610-390-21,310) plus usual allowances admissible under the existing Rules.
- b. The selectee shall initially be on probation for a period of one year, extendable for further one year as prescribed in Rule-15 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989.
- c. The services of the selectee shall be liable to termination at any time without assigning any reasons thereof before the expiry of probation / extended period of probation. If his performance during this period is not found satisfactory, in such an event, selectee shall be given one month prior notice of termination from service or one month pay in lieu thereof.
- d. In case the selectee wishes to resign at any time, a month prior notice shall be necessary or in lieu thereof one month pay will be forfeited.
- e. The employment shall be subject to production of necessary character certificate from two grade-17 or above officers and satisfactory verification of his character and antecedents and production of certificate of medical fitness from Medical Board / Medical Officer, PFI.
- f. His seniority will be determined from the date of his joining.

(7)

- g. Selectee shall be liable to serve anywhere in Pakistan.
- h. Selectee shall have to sign the enclosed undertaking, on joining the service.
- i. No TA / DA will be paid to the selectee for joining the appointment.
- j. The terms and conditions of service of selectee shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973 and other laws / rules applicable to the government servants.

If the offer is acceptable to the selectee on the above terms and conditions, he should report for duty within 14 days of receipt of this offer to office of the Director General, PFI, Peshawar, failing which the offer will be treated as cancelled.

Hakim Shah
Director General
PFI

✓ To

Mr. Muhammad Naveed S/o Zahoor-ul-Hassan
H.No. G-69, Mohallah Forest Colony,
Peshawar

No.

/F.VI(247) – Estt.

Dated:

/

2019

A copy is forwarded to:-

The Section Officer (Establishment), Forestry, Environment & Wildlife
Department, Government of Khyber Pakhtunkhwa.

Director General

8

GOVERNMENT OF KHYBER PAKHTUNKHWA
PAKISTAN FOREST INSTITUTE
PESHAWAR



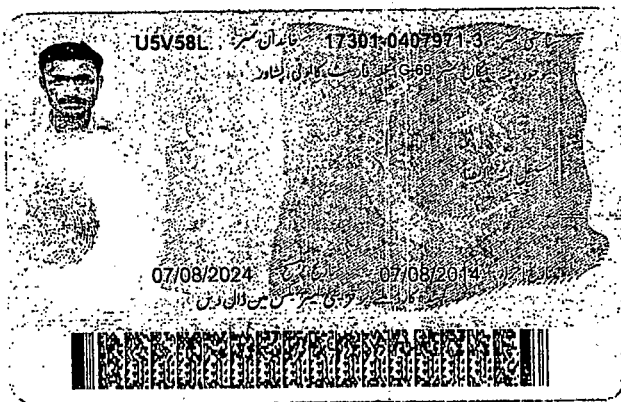
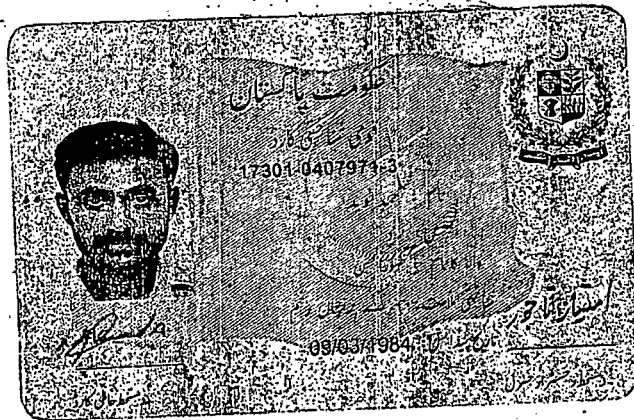
PAY SLIP OF
SIGNATURE
FOR THE MONTH OF

MR. MUHAMMAD NAVEED
MALI (BPS-03)
DECEMBER 2020
17301-0407971-3
DRAWING

Basic Pay	Rs.	10290
PP	Rs.	0
House Rent All	Rs.	0
Intg. All	Rs.	0
Convy All	Rs.	1725
Washing All	Rs.	0
Dress All	Rs.	0
Deputation All	Rs.	0
S.C. All	Rs.	0
A.R. 2013 5%	Rs.	0
A.R. 2015 2.5%	Rs.	0
A.R. 2016 10%	Rs.	805
A.R. 2017 10%	Rs.	1039
A.R. 2018 10%	Rs.	1039
A.R. 2019 10%	Rs.	1500
Medical All	Rs.	18,041
Total	Rs.	
G.P. Fund No		83
G.P. Fund	Rs.	
G.P. Fund Advance	Rs.	
H.R. Recovery	Rs.	
HBA Recovery	Rs.	
Int. MCA Recovery	Rs.	
B.T.	Rs.	
RBDO	Rs.	10
Without Pay	Rs.	
Income Tax	Rs.	11
Sub-Total	Rs.	8
Net Amount	Rs.	

(Signature)
Administrative Officer (B&A)
Pakistan Forest Institute
Peshawar

9



10



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, PESHAWAR

Ph: +92 91 9221224, 9216995, Fax: +92 91 9221233



No. 579 IF.IV(Per)-Estt

Dated 3rd May, 2021


To

Mr. Muhammad Naveed,
Mali,
Pakistan Forest Institute,
Peshawar.

SUBJECT: **SHOW CAUSE NOTICE**

I am directed to refer to the subject noted above and to enclose herewith Show Cause Notice duly signed by the competent authority for information and further necessary action accordingly.

Encl: As Above.


Administrative Officer (G)

Copy to:

1. Executive Officer, PFI, Peshawar.
2. APS to Director General, PFI, Peshawar.




GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, PESHAWAR
Ph: +92 91 9221224, 9216995, Fax: +92 91 9221233



SHOW CAUSE NOTICE

I Javed Anwar, DG, PFI as Competent Authority, under the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you Mr. Muhammad Naveed, Mali (BS-03), PFI as follows:

- i. Whereas you got recruited against Deceased's son quota with your brother already working in PFI. It has been reported time & again and noticed for long as per observation by your Officers In-Charge that you do not take interest in your duties. You are a habitual absentee, a malingerer, abusive, insolent rude, querulous character, always misbehaving with your seniors. Your irresponsible attitude towards your duty is evident from various explanations called, the latest ones vide letter No.404/EO(15)/2020, dated 24-11-2020, No.424/EO(40)/2020, dated 14-12-2020, No.430/EO(15)/2020, dated 28-12-2020, No.487/EO(15)/2021, dated 13-04-2021 and warning issued vide Office Order No.209/F.IV(Per)-Estt, dated 21-12-2020.
- ii. You applied for 10 days leave on medical grounds w.e.f. 19-03-2021 to 28-03-2021 and were supposed to join duty on 29-03-2021 but you are absent from duty to date
- iii. You are a known narcotics addict, using intoxicants and lose your senses frequently using foul, indecent, obscene, uncivilized language before your seniors and for female staff. You also cross limits trying to touch and get free with female staff using force & violence at times & resorting to harassment & threats of dire consequences.
- iv. You protect, harbor criminals, gamblers, outlaws & narcotics peddlers, and are involved in thefts and other undesirable activities in Staff Colony and PFI premises.
- v. On the basis of frequent & repeated complaints, and having been kept under surveillance & observation, you have proved that habits die hard and have become incorrigible to be further counselled/advised and retained in


3/05/21

Government service as you have created tortuous & unbearable environment for others to survive & live in peace.

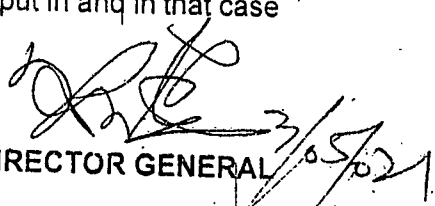
12

vi. After having a meticulous analysis of your doings and personality as mischief monger & examination of personal file, repeated complaints, abnormally violent attitude, indecency, immoral life style, I being Competent Authority am satisfied that conducting formal enquiry would be a totally futile exercise & wastage of time & energy. You appear to be unfit for Government job on the basis of tangible proof on record & repeated complaints by staff both male & female. You appear to be guilty & involved in commission of serious misconduct and acts of Omission & Commission as given below make you liable to be served Show Cause Notice for Offences mentioned:

- a) Inefficiency, unserious & happy go lucky attitude
- b) Misconduct, misbehavior, obscenity, vulgarity, delusions, hallucinations to do acts what sane & sensible people cannot ever imagine to do
- c) Habitually remaining absent & escaping from duty without permission or seeking approval of your senior In-Charge Officers
- d) You have grandiose ideas about yourself and do not bother to seek apology for any wrong done or absence or foul language used, you consider yourself to be always correct & right and the whole world as wrong.

2. Now therefore I, as Competent Authority, in exercise of powers conferred under rule 5 read with rule 7 of the Efficiency & Discipline rules hereby deem it appropriate to dispense with further inquiry into your conduct and have decided tentatively to impose upon you the major penalty of Dismissal from service under rule 4 (b) of the rules ibid. 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 or otherwise. You may submit your written reply within 07 days of receipt of this notice whether you want to avail the opportunity of personal hearing or otherwise. Your reply must reach on expiry of 07 days period or before as deemed appropriate.

3. If no reply to this Notice is received upon termination of 07 days from the date of receipt, it shall be assumed that you have no defense to put in and in that case ex-parte action shall be taken against you as per rules.


DIRECTOR GENERAL



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, PESHAWAR

Ph.: +92 91 9221224, Fax: +92 91 9221233



Dated 10th June 2021

13

OFFICE ORDER

No. 96 /F.III(Per)-Estt: WHEREAS, Mr. Muhammad Naveed, Mali (BPS-03), Pakistan Forest Institute (PFI), Peshawar was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, for the charges as mentioned in the Show Cause Notice, served upon him vide No.579/F.IV(Per)-Estt, dated 3-5-2021.

2. **AND WHEREAS**, the Competent Authority, after scrutiny of the relevant record and documents of the case decided to dispense with the Inquiry proceedings as per Rule 5 (a) of the Rules ibid and served a Show Cause Notice upon the above named accused official to which he did not like to respond. The accused was provided ample opportunity of personal hearing but he did not care to avail the opportunity of personal hearing after lapse of several weeks.

3. **AND WHEREAS**, the Committee on Harassment of Women at Work Place of PFI, Peshawar, as constituted under Government of Khyber Pakhtunkhwa Protection against Harassment of Women at Workplace Act 2018, recommended that the accused Mr. Muhammad Naveed, Mali (BPS-03) was guilty and not fit for Government Service. He was rogue, character-less and a narcotics addict.

4. **NOW, THEREFORE**, the Competent Authority, after having considered the charges, evidence on record and recommendation of the Committee on Harassment of Women at Work Place of PFI, Peshawar and exercising his powers under Rule-7(f) read with Rule-4(1)(b)(iv) of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011, deems it appropriate to impose the major penalty of "**DISMISSAL FROM SERVICE**", upon Mr. Muhammad Naveed, Mali (BPS-03), PFI, Peshawar, for misconduct and involvement in immoral activities, with immediate effect.

-sd-

DIRECTOR GENERAL

ENDST. NO. & DATE EVEN:

A copy is forwarded to:

1. Executive Officer, Pakistan Forest Institute, Peshawar
2. Administrative Officer (B&A) Pakistan Forest Institute, Peshawar
3. APS Director General, Peshawar
4. Mr. Muhammad Naveed, Mali, Pakistan Forest Institute, Peshawar


Administrative Officer-(G)

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To,

①

I. **THE Chief Conservator,**
Government of Khyber Pakhtunkhwa Forestry,
Environment & Wildlife Department, Pakistan Forest
Institute, Peshawar

②

II. **Secretary,**
Government of Khyber Pakhtunkhwa Forestry,
Environment & Wildlife Department, Pakistan Forest
Institute, Peshawar

Subject: **DEPARTMENTAL APPEAL AGAINST THE ORDER**
DATED 10.02.2021 PASSED BY ADMINISTRATIVE
OFFICER ON BEHALF OF DIRECTOR GENERAL (D.G.F)
FOR DISMISSAL FROM SERVICE OF APPELLANT ON
THE BASIS OF FALSE ALLEGATION.

Respected Sir,

1. That the appellant is serving as Mali/Gardner (BPS-03) at PF 1, Peshawar since the date of his appointment dated 22.01.2019.
2. That since the date of his arrival the appellant spared no chance to serve the department to the best of satisfaction of his high ups and brother colleagues.
3. That obidents to the high-ups their confidence and trust in appellant was in tolerable by other jelousing

colleagues who spared no chance to bring bad name and reputation of the appellant towards him.

4. That for the reason the appellant always remained in tension and for the reason become patient of depression, therefore he is under treatment of different debtors.
5. That the appellant due to severe illness got Medical line initially for the period of 10 days from 19.03.2021 to 28.03.2021 but due to persistent condition he could not resume his service that mean while the administrative officer on behalf of D.G (PFI) served a confused and ambiguous officer show cause notice upon the appellant where in dozen of false allegations were leveled against the appellant and in the same show cause notice the penalty of dismissal from service, which was astonishing for the appellant.
6. That in furtherness of the said show cause notice the impugned order was passed against the appellant whereby he was dismissed from service. Hence, the present appeal on the following amongst other grounds:

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GROUND:

- A. That the appellant has been proceeded against unjustifiedly, without any ground reality and only unfactitious and so called complaints.
- B. That the appellant was not served properly neither show cause notice nor statement of allegations coupled with supporting evidence was ever served upon him, which the appellants could be able to defend himself against such false allegation.
- C. That the impugned order was passed without observing codal formalities neither any notice was served nor any publication was made in any news paper.
- D. That all the proceedings against the appellant were conducted at the back of appellant without hearing the appellant which in way maintainable in the eye of law.

It is, therefore most humbly requested that on acceptance of this appeal and the impugned order dated 10.06.2021 of the administrative officer may kindly be set aside and the appellant be reinstated with all back benefits in best interest of justice.

Appellant



Muhammad Naveed

CNIC No. 17301-0407971-3

Mobile No. 0332-9361937,

0322-9112366

NOTICES

29/6/2021

17

No. 1312 For Insur. RGL58832866 Rs. Ps.

Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered* addressed to Secretary Date-Stamp

Initials of Receiving Officer PO with the word "insured" before it when necessary. Insured for Rs. (in figures) 68- (in words)

If insured: Insurance fee Rs. 1/- Ps. 00 Weight 68 Kilo 00 Grams Name and address of sender W. M. Secretary

1313 For In RGL58832867 Rs. Ps.

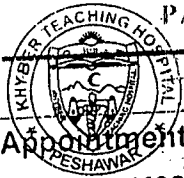
Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered* addressed to Chief Conservator Date-Stamp

Initials of Receiving Officer PO with the word "insured" before it when necessary. Insured for Rs. (in figures) 68- (in words)

Insurance fee Rs. 1/- Ps. 00 Weight 68 Kilo 00 Grams Name and address of sender W. M. Secretary

18



PARCHI INVOICED OUTPATIENT DEPARTMENT (OPD)

PSYCHIATRY - OPD Khyber Teaching Hospital
Medical Teaching Institution, Peshawar
Khyber Pakhtunkhwa - Pakistan.

Appointment Time : 10:48:00

M.R. No : K0300003229911
Name : Muhammad Naveed
Gender : Male
Age : 42 Year(s)

Invoice # : K03211575920
Receipt # : K03210902913
Amount Paid : 10.00
Date : 03-JUN-21

55

History

Complaints:

Rx

Admit psychiatry ward

Clinical Examination

Follow-up visit

Dr. Att

Presenting Diagnosis

Left medication against medical advice

1mg Clopixol Depot 200mg
1/1 x Stat

Investigations:

Aggressiveness
Restlessness

Tab. Olan Lomp
(1/1) 1+1

Diagnosis:

O/E? - Very Anxious
- Depressed

Tab. Dapakan 500mg
(1/1) 1+1+1

Next Visit:

Consultant Name:

For Prof. Dr. Bashir Ahmad

Signature:

[Signature]

KHYBER TEACHING HOSPITAL PESHAWAR

DEPARTMENT OF PSYCHIATRY

19

ph: 0092-91-9224400-7
website: www.kth.gov.pk/E-mail: info@kth.gov.pk



Professor & Head of Department

Dr. Bashir Ahmad

MBBS, DPM, FCPS, CCST (England)
PgDip CBT (King College London University)
Cert Med. Education (Oxford University England)

Assistant Professor

Dr. Imran Khan

MBBS, MCPS, FCPS
Pg Cert-CBT

Assistant Professor

Dr. Aziz Muhammad

MBBS, FCPS

Senior Registrar

Dr. Sher Ayub

MBBS, FCPS

Social Medical Officer

S. M Alam Shah

Clinical Psychologist

Dr. Robina Sarwar

Msc. M. Phil
Pg Cert. CBT

Name: Muhammad Naveed [✓] S/o, Wo, D/o Zahor ul Hassan

Age: 42 yrs. Gender M Address Forest Colony Peshawa

Bed No: 5 ^(M) CNIC: _____

Phone: _____

Admission No 03229911 Date & Time of Admission 03/6/21

Source of Admission OPD Date of Discharge 11/6/21

Name & Designation of Admitting Doctor Prof Dr. Bashir Ahmad

Summary of The Case

20

Name M. Naveed Age 42yr Sex M

Address Peshawar Cell: _____

- * This patient presented to us & suspiciousness
 - Aggression
 - Anger outbursts
 - Weeping spells
 - Lack of happiness
 - Loss of appetite
 - ↓ sleepfrom past 6 months
- * Patient has hx of substance abuse & had detox treatment from some center where he spent 10-14 days.
- * Patient has aggression that he breaks things, shatters glasses.
- * Acc to collateral info (sibling) he has hx of physical abuse but patient & mother denying
- * Collaterals were not reliable so it's hard to make diagnosis, patient is also denying collateral info.
- * Patient has improved & medication
Sending home

[Signature]

Past History

Medical - Not Significant
* Bike Accident (2 yr) Cervical collar
* 2nd bike accident - 1 month back

1
2
3

Family Hx

Mother alive, father died in childhood
3 brothers, 2 sisters, Youngest in BO
All siblings married
Nuclear family system
Wife left 6 months back
SES Average

Final DX
Remarks

Personal Hx

Childhood : Uneventful
Education: Matric (private education)
Job: Gardner in govt setup (Forest Dept)
M/F 1 year wife relative (wife had a son from her 1st marriage)

Significant Findings on Mental state Examination

Hb%
RBS
S.Creat
Anti HC
Others

Differential Diagnosis

21

- 1 Depressive illness & ^{Acute/Brief} Psychotic episode.
- 2 ~~Agitated~~ Agitated Depression
- 3 BAD currently mixed
Schizophrenia

Final DX: Under consideration.

Working: Depressive illness & brief psychotic episode.

Remarks

Investigations

Hb% _____ TLC _____ ESR _____

RBS _____ SGPT _____ ALT _____

S.Creatinine _____ HBS Ag _____

Anti HCV _____

Others _____

Treatment At Hospital

- Inj Cloperol Depot 200mg IM stat on 03/6/21
- Tab Olan 10mg 1x BD
- Tab Dapakan 500mg 1x TDS

PLAN is to taper the doses of medications

Treatment for Home

گھر کیلئے علاج

22

Rx

① Tab Olagen plus 6/25
گولیاں کو

② Tab Dapakan 500mg
گولیاں 1+1

20 دن بعد دوبارہ معائنہ کیلئے
Psychiatry OPD - شریف (اسٹن) -

Prepared by

Name DR. NAZARAT-UL-AHMAD

Designation Resident (I)

Signature [Signature]

Checked by

Name _____

Designation _____

Signature _____

MTI, Khyber Teaching Hospital

University Road, Peshawar.. Phone: 091-9224400, Fax:
Email: info@kth.gov.pk, Website: http://www.kth.gov.com



VIEW: 08-Jun-2021 12:56:24

Chemical Pathology Report

Page 1 of 1

3

MRNO : K03-00003229911
Name : MUHAMMAD NAVEED
Age/Sex : 42 Year(s)/Male
Phone :
Address : , PESHAWAR - PAKISTAN

Ordered By :
In-house Consultant :
Report Destination :
Requested : 08-JUN-2021 08:42:00
Specimen Received : 08-JUN-2021 08:44:27
Reported : 08-JUN-2021 10:27:10

Chemistry - I

TEST(s)	NORMAL	UNIT(s)	K03CHM21116468
			08-JUN-2021 10:27:10
BLOOD UREA	10 - 50	mg/dL	19.7
GLUCOSE (RANDOM)	70 - 140	mg/dL	113.3
TOTAL BILIRUBIN	0.1 - 1.0	mg/dL	0.35
ALT/GPT	10 - 50	U/L	24.3
ALKALINE PHOSPHATASE	40 - 129	U/L	75
CREATININE	0.64 - 1.2	mg/dL	0.81

Note : Lab values should always be correlated with clinical picture.
Normal Range(s) and Unit(s) shown are for most recent results.



24

VIEW: 08-Jun-2021 12:56:26

Haematology Report

Page 1 of 1

MRNO : K03-00003229911
 Name : MUHAMMAD NAVEED
 Age/Sex : 42 Year(s)/Male
 Phone :
 Address : PESHAWAR - PAKISTAN

Ordered By
 In-house Consultant :
 Report Destination :
 Requested : 08-JUN-2021 08:42:00
 Specimen Received : 08-JUN-2021 08:44:27
 Reported : 08-JUN-2021 08:59:53

CBC

TEST(s)

	NORMAL	UNIT(s)	K03HEM21108321 08-JUN-2021 08:59:53
WBC	4 - 11	x10.e 3/ μ l	11.5
RBC	4 - 6	x10.e 6/ μ l	5.45
HGB	11.5 - 17.5	g/dL	14.3
HCT	36 - 54	%	42.3
MCV	76 - 96	fL	77.6
MCH	27 - 33	pg	26.2
MCHC	33 - 35	g/dL	33.8
PLT	150 - 450	x10.e 3/ μ l	234
MPV	7.2 - 11	fL	9.5
%NEUT	40 - 75	%	80.4
%LYMP	20 - 45	%	14.6
%MXD	5 - 20	%	5

Note : Lab values should always be correlated with clinical picture.
 Normal Range(s) and Unit(s) shown are for most recent results.



25

Haematology Report

VIEW: 08-Jun-2021 12:56:20

Dept Ref# : K03HEM21108321
MRNO : K03-00003229911
Name : MUHAMMAD NAVEED
Age/Sex : 42 Year(s)/Male
Phone :
Address : PESHAWAR - PAKISTAN

Ordered By :
In-house Consultant :
Requested : 08-JUN-2021 08:42:00
Specimen Received : 08-JUN-2021 08:44:27
Reported : 08-JUN-2021 10:32:24

Hematology - Misc

SPECIMEN : Blood

TEST(s)

ESR

RESULT(s) UNITS

6 mm/1st hr

REFERENCE RANGE

0 - 15



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT

NO.SO(Estt)/FE&WD/V-13/2017/MF
Dated Peshawar the, 28th December, 2021 /115-17

To Muhammad Naveed,
Ex-Mali, PFI.

C/o DG PFI.

Subject: - DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 10.2.2021
PASSED BY ADMINISTRATIVE OFFICER ON BEHALF OF DG PFI
FOR DISMISSAL FROM SERVICE OF APPELLANT ON THE BASIS OF
FALSE ALLEGATION.

I am directed to refer to the subject captioned above and to state that your subject Appeal dated NIL has been considered and rejected by the Secretary FE&W Department being Appellate Authority under Rule-17 (2) (a) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011.


SECTION OFFICER (ESTT)

Endst: No: & date even

Copy is forwarded for information to:-

1. Director General, PFI, Peshawar.
2. Administrative Officer (G), PFI Peshawar w/r to his letter No.1457/F.IV/(Per)-Estt dated 24.11.2021
3. PS to Secretary, FE&W Department, Khyber Pakhtunkhwa.


SECTION OFFICER (ESTT)

(S)

(27)

BEFORE THE CHAIRMAN SERVICES TRIBUNAL KPI
PESHAWAR

Khyber Pakhtunkhwa
Services Tribunal

MUHAMMAD NAVEED – BPS (3) MALI

Case No. 11-3

VERSUS

Dated 26/01/2022

PAKISTAN FOREST INSTITUTE PESHAWAR THROUGH
DIRECTOR GENERAL

APPEAL U/S 4 OF KPK SERVICES TRIBUNAL
ACT 1974

AGAINST THE DEPARTMENTAL ORDER
DATED 28 DEC 2021

RESPECTFULLY SHEWETH:

1. That appellant is serving as a Mali-BPS (3) at Pakistan forest institute and was appointed one 22 JAN 2019.

Filialto-day

26/01/2022

2. That his conduct was best to the satisfaction of the colleuges and other officials.

3. That there was neither any complaint nor any report was against him in all due service time in the department.

4. That due to some domestic and family circumstances he had panic attacks and got severe illness of depression for which he was treated in different hospitals under specialist doctors (Medical Reports are annexed with the appeal).

5. That mean while appellant was admitted for his treatments a show cause notice was issued by DG PFI on 28-03-2021 with many false allegations and penalty Of dismissal from service.

(28)

6. That it was astonishing that further he was terminated from the service without any reason and proof hence the present appeal on the following grounds among others.

GROUND:

- A) That the appellant has been proceeded unjustifiedly, without any ground reality.
- B) That the appellant was not served properly neither show cause notice nor statement of allegations were ever served.
- C) That the establishment code formalities were neither adopted while serving the notices neither publication was ever made in the newspapers.
- D) That the appellant was condemned unheard which does not stands in the eyes of law.

It is therefore humbly prayed that on acceptance of this appeal the impugned order dated 10-06-2021 of Secretary PEW may kindly be set-aside and the appellant be reinstated with all previous benefits in best interest of justice.

Appellant
Mohammad Naveed

Through


KASHIF IQTIDAR KHALIL

Advocate High Court

Cell No: 0332-9080660

Dated 25/01/2022



82216

29

ایڈوکیٹ/دستخط: محمد امجد
 بار کونسل ابار ایسوسی ایشن نمبر: bc. 10.8860
 رابطہ نمبر: 0316 9405550

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: محکمہ سروسز ٹرانسپورٹ

منجانب: <u>نوید امجد</u>	دعویٰ: <u>ریپل</u>
نوید بنام فارمیٹ انسٹیٹیوٹ	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
بابت تحریر آنکہ	

KASAB FOLIO AR ADVOCATE
1720-1725

KASAB FOLIO AR ADVOCATE
1720-1725

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ کا سلسلہ کاروائی کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر حالت و فیصلہ برصفت دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں ہدستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ ہداختہ منظور و قبول ہو گا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہو گا وہ وکیل موصوف وصول کرنے کا حقدار ہو گا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 22/01/2022
 العواہ شد

مقام پشاور کے لئے منظور ہے۔

“B”

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.**

No.

Regd

SB

Appeal No. *597* of 20 *22*

Muhammad Naveed Appellant/Petitioner

Versus

Secy Forestry Environmental & wild life Deptt. Peshawar
Respondent

Respondent No. *(2)*

Notice to: —

DG Pakistan Forest Institute Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *23/06/2022* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this *12th*.....

Day of *May*.....20 *22*

For Reply

[Signature]

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

Resd

Appeal No. *597* of 20 *22*

SB

Muhammad Naveed Appellant/Petitioner
Versus

Secy Forestry Environmental & wild life Deptt.
Respondent No. *(3)*

Notice to: —

Chief Conservator Pok Forest Institute Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this *12th*

Day of.....*May*.....20 *22*

For Reply

[Signature]
Registrar,
Khyber Pakhtunkhwa Service
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holiday.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. SB

No.

Appeal No. 597 of 20 22

Muhammad Naveed Appellant/Petitioner

Secy Forestry Environmental & wild life Deptt: Peshawar Respondent

Respondent No. (1)

Notice to:

Secy Forestry Environmental & wild life Department
Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 23/06/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

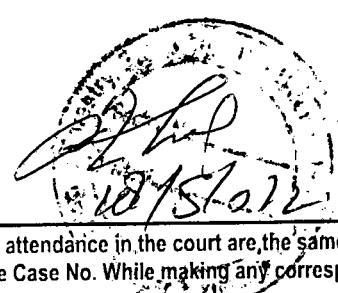
Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 12th

Day of May 20 22

For Reply



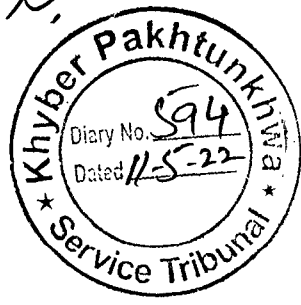
[Handwritten signature]

[Handwritten signature]
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note:
1. The hours of attendance in the court are, the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

خدمت جناب جسٹس عین کرسٹین سروس ٹریبونل کی سہولت کے لئے



محمد نوید صاحب
پاکستان فائر ایف ایس ڈی

سروس ایف ڈی نمبر 597/22

درخواست نمبر 1 اور مہلت عطا کرنے کے لئے جلال خان فیس

جناب عالی کے سامنے حسب ذیل عرض کی جا رہی ہے

1۔ کہ مہلت کے دوران جلال خان بلاکہ میں عدالت حضور کو راج فیس جلال خان جمع کرنے کا حکم صادر فرمایا تھا۔ (گزارشت تاریخ 22-04-22)

2۔ کہ جلال خان فیس جمع کرنے کی وجہ سے عدالت حضور نے جلال خان فیس جمع نہ کرانا قصداً و عمداً نہ تھا۔ (گزارشت تاریخ 23/6/22 مقررہ)

3۔ کہ اس کے علاوہ جلال خان فیس جمع کرنے کا حکم صادر فرمایا تھا۔

لہذا استدعا ہے کہ جلال خان فیس جمع کرنے کا حکم صادر فرمایا گیا ہے

11/05/2022 (محمد نوید)

محمد نوید صاحب
محمد رفیق خان مخدوم ایڈووکیٹ

(Signature)

“A”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.B
PESHAWAR.

No.

APPEAL No. 597 of 20 22

Muhammad Naveed Mali

Appellant/Petitioner

Versus

Secy. forestry Environmental Peshawar.
RESPONDENT(S)

Respondent No. 3
Notice to Appellant/Petitioner Chief Conservator forest Peshawar.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 27/9/22 at 9:00.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply

Registrar,

, Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

31/08/22

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 597-P/2022

Mr. Muhammad Naveed, Mali (BPS-03), Pakistan Forest Institute (PFI), Peshawar

.....**APPELLANT**

VERSUS

1. The Secretary, Forestry, Environment & Wildlife Department, Government of Khyber Pakhtunkhwa
2. The Director General, Pakistan Forest Institute, Peshawar

.....**RESPONDENTS**

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(1)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service appeal No. 597- P/2022

Mr. Muhammad Naveed, Mali (BPS-03)
Pakistan Forest Institute (PFI), Peshawar

.....**APPELLANT**

VERSUS

1. The Secretary, Forestry, Environment & Wildlife Department, Government of Khyber Pakhtunkhwa
2. The Director General, Pakistan Forest Institute, Peshawar

.....**RESPONDENTS**

PARAWISE COMMENTS ON BEHALF OF RESPONDENT No. 1,2

Respectfully Sheweth:

Preliminary Objections:

1. That the appellant has no legitimate cause of action.
2. That the appellant has no locus standi to file instant appeal.
3. That the appellant has not come to the Hon'ble Khyber Pakhtunkhwa Service Tribunal, with clean-hands.
4. That the appeal is not maintainable due to mis-joinder and non-joinder of necessary parties.
5. That the post of Chief Conservator, PFI, Peshawar not existed in Pakistan Forest Institute, Peshawar as mentioned respondent No. 3 in the subject appeal.
6. That the appeal of the appellant is badly time barred.

Respected Sir:

1. Pertaining to record.
2. Incorrect. That the appellant was insolent of PFI Colony and always quarrelling with his seniors. In this regard, complaints of PFI Colony residents alongwith recommendations of Executive Officer, PFI letter for taking appropriate action is attached (**Annex – A, B, C, D & E**).
3. Incorrect and misleading. That besides, narcotics addict, using Ice and other most dangerous drugs, he was a malingerer and habitual absentee. In this regard, explanations/reports and leave without pay of the appellant are as under:

- b. Leave without pay vide office order No. 209/F.IV(Per)-Estt, dated 21.12.2020 (**Annex - G**)
- c. Explanation No. 424/EO(40)2020, dated 14.12.2020 (**Annex - H**)
- d. Explanation No. 430/154/2020, dated 28.12.2020 (**Annex - I**)
- e. Explanation/Absentee report vide No. 158/F.V(Per)-Estt, dated 26.01.2021 (**Annex - J**)

4. Incorrect and misleading. As explained in para 3 above.
5. Incorrect. As explained in para No. 3 above that Show cause notice was served to appellant through Security Guard and proper signature of the appellant was obtained from him (**Annex - K**). It is to mention that the competent authority issued dismissal order of the appellant after receiving report of the "committee on harassment of women employee of PFI at work place" (**Annex - L**). It is further to mention that his crime like assaulting female staff, narcotics addiction, theft, running gangs, harboring criminal outsiders in PFI staff colony residence and misconduct was so gruesome and heinous that serving statement of allegation/charge sheet was considered a futile exercise, wastage of state stationary and human energy.
6. As explained in para No. 2, 3 & 5.

Grounds


- A. Incorrect: That the appellant was dismissed from service after proper investigations upon the reports/complaints received to this office. It is to mention that under the influence of narcotics, the petitioner felt regal, started considering the female staff of PFI as his personal property and insulted them. One female staff member in her defense banged the office register on his head to defend herself which he took as insult and threatened her with dire consequences. Similarly another female staff member made an identical complaint with tears in her eyes. The matter

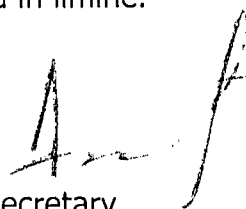
/ / 3

was assigned to the PFI committee on harassment of women at work place. The committee declared the petitioner Mr. Muhammad Naveed, Mali (BS-03) unfit to retain in Government Service, recommended to send him to jail or mental hospital (**Annexure - M**).

- B. Incorrect. As explained in para 5 of facts.
- C. Incorrect and misleading. As explained in para No. 5 of the facts. In this regard, newspaper ads were not required. He wander around due to intoxication and euphoria induced by narcotics he used.
- D. Incorrect and misleading. That tangible and concrete proofs are on record. He never appeared for personal hearing, always sending his old aged mother and other relatives giving false defense in his favour. He had no defense at all. His thoughts were incorrect irrational, immoral and unacceptable to norms of the society.

In view of the above, it is requested that the petition being baseless and devoid of merit may please be dismissed in limine.


Director General
Pakistan Forest Institute,
Peshawar
Respondent No. 2


Secretary,
Government of Khyber Pakhtunkhwa
Forestry, Environment & Wildlife Department
Respondent No. 1

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO.597-p/2022

Mr. Muhammad Naveed, Mali (BPS-03), Pakistan Forest Institute (PFI), Peshawar

.....**APPELLANT**

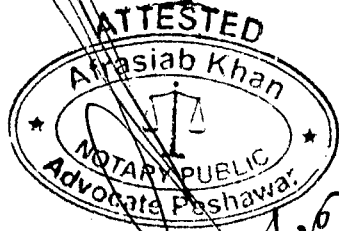
VERSUS

The Secretary, Forestry, Environment & Wildlife Department, Government of Khyber
Pakhtunkhwa & Others

.....**RESPONDENTS**

AFFIDAVIT

I, Farhan Ahmed, Superintendent, Pakistan Forest Institute, Peshawar, do hereby solemnly affirm and declare on oath that the contents of reply of Service Appeal No. 597-P/2022, on behalf of Respondent No. 1 & 2 are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



15/8/2022

Deponent

ENIC# 17301-1555108-5
0333-9280901

Annex - A

(S)

Diary No: 268
Date: 26-04-2021
Section: General Section
Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
Forestry, Environment & Wildlife Department
Pakistan Forest Institute, Peshawar



Ph: +92-91-9221186, Fax: +92-91-9221233

No. 492 /EO(40)/2021

Dated: 22 April, 2021

To

The Director General,
Pakistan Forest Institute
Peshawar

Dairy No: 815
Dated: 23-04-2021
Director General Office
PFI, Peshawar

SUBJECT: COMPLAINT OF COLONY RESIDENTS & PFI STAFF

Reference: Reply / comments / recommendations, regarding Mr. Muhammad Naveed, Mali as per instructions contained under explanation of Mr. Muhammad Naveed, Mali vide complaint No.487/E.O(15)/2021, dated 13-04-2021 are submitted as under:

Mr. Muhammad Naveed, Mali appointed against decease^d employee's son quota and presently posted in EO Section has been kept under observation for a long time. He was served warnings time & again both verbally and in black & white. His explanations were called, the last one vide E.O Office letter No. 489/EO(15)/2021, dated 13-14/2021, reported by Abdul Jabbar Field Assistant (F/A) with direction to submit reply within 03 days positively of issuance of the Explanation.

Mr. Naveed is a careless, mentally imbalanced individual. He did not bother to respond within stipulated time frame. Female staff of PFI complained several times about his uncivilized behavior and vulgar & immoral, obscene, talks & attitude. He has also been reported to be involved in thefts in staff colony and is a narcotics addict (copies of complaints and reports of Arm Guards are attached at F/B, F/C, & F/D). He is not fit for PFI service or any Government job.

In view of the foregoing, it is proposed that he may be served show cause notice & provided opportunity of personal hearing as per E&D Rules and a penalty be imposed on him as deemed appropriate as per rules.

20/4
AO (G)

22/04/21

W11-1
22/04/21
Executive Officer
Pakistan Forest Institute

صبا عالی

46

ورد باڈنگز میں ہے کہ میں فورسائی کے پاس کھنڈا لٹا میں
 اپنے بچے کو سکول سے لینے کہتے جا رہا تھا اسی وقت محمد نذیر عالی
 میرے پاس آیا اور کہنے لگا کہ مجھے 10 منٹ لینے کوٹر سائیکل دے
 دو میں بازار سے سودا لے کر آتا ہوں میں نے اپنا کوٹر سائیکل
 اس کو دے دیا مگر سب انتظار کے بعد بھی وہ اس

STL-4530

میں آیا میں اس کے گھر بھی گئی بارگاہ گھر میں کے
 گھر میں تالا تھا گھر بھی میں نے سب انتظار کیا کہ
 سوکتا ہے اکبر آجائے مگر اس کا ابھی تک کوئی
 نہیں ہے اور اس کا خون بھی بند ہے۔ فردی
 ایجنٹس ڈیوٹی میں رہ کر ڈارپر کام کرتا ہے
 میں نے اپنا کوٹر سائیکل اس کو دیا

کو اس کے گھر آ گیا وقت 11:00 بجے بتایا 5 1/2

صبا عالی۔ ایس ڈی میں حضرت سے اس کے خلاف
 قانونی کارروائی کر جائے

ایس ڈی
 ایس ڈی
 ایس ڈی
 6-1-21

6/1/2021

مت خان - E/10 صاحب پاکستان فاسٹ انسٹی ٹیوٹ شاہ

ان شکایت بخلاف دہشت گردی

12/04/2021
 Complaint Report
 5.1.4

جناب عالی

دبانہ گزارش ہے۔ کہ ہم بی ایف ای ٹی کالونی میں رہ رہے ہیں۔

یہاں ایک لٹر کا نوید بھی رہ رہا ہے۔ جو کہ انتہائی کم اصل
 رقبہ کردار لٹر کا ہے۔ کبھی کسی کھی کو لٹر کے سامنے چرس والے
 گریٹ پیتا ہے۔ اور کبھی کسی کے کو لٹر میں گھستا ہے۔

کئی وجہ سے عورتیں اپنی کو لٹر کے صحن میں چل پھر نہیں سکتی۔

ذات آپ صاحبان سے بعد روانہ التماس کرتے ہیں۔ کہ آپ

صاحبان مہربانی فرما کر اس لٹر کے کو فیملی کو لٹروں سے دور
 لٹر دیا جائے۔ کیونکہ لٹر کے کو لٹر H45 ہے۔ جو کہ فیملی کو لٹروں
 درمیان میں ہے۔

اسلئے آپ صاحبان سے پر زور کارروائی کی توقع رکھتے ہیں۔

الحارصین
 تو عین نوازش ہوگی

المرقوم محمد خلیل
 12/04/2021

- 1 محمد بشیر خان (6)
 - 2 تاج مہر - چوکلہ (7)
 - 3 محمد عارف PFI کالونی (8)
 - 4 محمد زاہد (9)
 - 5 کاشف (10)
- عالمگیر خان (مالی) (11)

عزت عالی

ذرا غور فرمائی ہے کہ نوڈر عالی کو نوڈر نمبر H-45 میں رہائش دینا ہے
نوڈر ساتھ ہوگی اور والہ رستی بھی لکھیں۔ نوڈر میں نوڈر عالی
رہتا ہے اور اس سے نوڈر میں آئیں لوگوں کے ساتھ جو لوگ

رٹ برک ضرور کارروائی کیے ہیں فرمیں۔

12/4/2021

محمد ارمین کاروچی الفرائی آباد
12/4/2021

12/4/21

Say dear combine all
the complaints and
organize him at putrep

صاحب صاحب الی البانی

صاحب عالی

زبانی سے کہ آج محمد یونس صاحبی دفتر آیا تھا اس نے دفتر میں
 (مدیر) سے سائفر گائی گائی کی لہذا اگر کسی نے منع کیا تو اس
 کے اسٹے اور چہ کو نکال دیا اس نے دفتر میں آئی کہ
 ساتھ بہترین کی ہے وہ دفتر آتا ہے اور میں ہر آئی
 سنا ہے۔ کاروباری والوں نے یہ اس کے خلاف
 اور اس کی ہے یہ کاروباری میں اس کے بھائی کو
 چاہتا ہے یہ بانی فرما رہا ہے اس کے کوئی نہیں جانتا
 کہ اس کے خلاف کاروباری فرما رہی ہے اس کے لئے

الکافی

شکرچہ لیکچر

لیکچر خانہ، لاہور

۱۵ اکتوبر

تاریخ: ۱۹/۱۰/۲۱

Ammae f

10



GOVERNMENT OF KHYBER PAKHTUNKHWA
Forestry, Environment & Wildlife Department
Pakistan Forest Institute, Peshawar



Ph: +92-91-9221186, Fax: +92-91-9221233

No. 664 /EO(F)/2020

Dated: 24/11

November, 2020,

To
Mr. Muhammad Naveed
Mali,
Pakistan Forest Institute,
Peshawar

9140
26/11/2020

Subject: EXPLANATION

It has been noticed that you were remained absent from your duty on the following dates without any application/information/approval which is highly objectionable and negligence on your part, you are habitual to come late and leave before closing office hours. Many times you were personally called and informed to improve your performance and observe office timing strictly but you failed to improve yourself.

- | | |
|-----------------|--|
| September, 2020 | 04-09-2020, |
| October, 2020 | 20-10-2020, 27-10-2020 & 29-10-2020 |
| November, 2020 | 3-11-2020, 6-11-2020 to 16-11-2020 and 24-11-2020. |

You are directed to explain your position within 03 days after issuance of this letter; otherwise strict disciplinary action will be taken against you under the E&D Rules, 2011 of Khyber Pakhtunkhwa.

Abdullah Naveed
Executive Officer
Pakistan Forest Institute

CC:

1. The Deputy Director (Tech), PFI, Peshawar
2. APS to Director General, PFI, Peshawar

*Please submit the reply of the official
along with the members' recommendations.*

Acc 11/11/20

24/11/20



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, PESHAWAR

Ph: +92 91 9221224, Fax: +92 91 9221233



(11)

Dated 21 / 12 / 2020

OFFICE ORDER

No. 209 /F.IV(Per)-Estt: The Executive Officer, Pakistan Forest Institute (PFI), Peshawar vide letter No. 404/EO(15)/2020, dated 24-11-2020, called explanations of Mr. Muhammad Naveed, Mali, on account of his absence from duty on the following dates, without any information or prior approval.

S. No.	From	To	No. of days	Total
1.	04-09-2020	-	01	01
2.	27-10-2020	-	01	01
3.	29-10-2020	-	01	01
4.	03-11-2020	-	01	01
5.	06-11-2020	16-11-2020	11	11
6.	20-11-2020	-	01	01
7.	24-11-2020	-	01	01
			Total	17 days

2. The aforesaid official submitted his reply on 25-11-2020. The Executive Officer forwarded the reply with the recommendations that his reply is unsatisfactory, therefore, his absence for the above mentioned periods may be treated as leave without pay.

3. Consequent upon the recommendations of Executive Officer, Pakistan Forest Institute (PFI), Peshawar the absence period of Mr. Muhammad Naveed, Mali, PFI (17 days) is hereby treated as leave without pay.

4. He is, also warned to be careful in future otherwise, strict disciplinary action shall be taken against him.

Deputy Director (Technical)
Pakistan Forest Institute

Endst. of Even No. & Date

A copy is forwarded to:

1. The Executive Officer, PFI, Peshawar, with reference to his recommendations dated 30-11-2020.
2. The Administrative Officer (G), PFI, Peshawar, with request to please enter the above Office Order in the service book of the official under intimation to undersigned and perusal of Director General, PFI on personal file of the official.
3. The Administrative Officer (B&A), PFI, Peshawar.
4. Mr. Muhammad Naveed. Mali. PFI. Peshawar.

(12)

Diary No: 1020
Date: 15/12/2020
Section: _____

Amman - H



P.F.I. Peshawar
GOVERNMENT OF KHYBER PAKHTUNKHWA
Forestry, Environment & Wildlife Department
Pakistan Forest Institute, Peshawar



Ph: +92-91-9221186, Fax: +92-91-9221233

No. 424 /EO(40)/2020

Dated: 14 December, 2020,

To ✓

The Deputy Director (Technical),
Pakistan Forest Institute,
Peshawar

Subject: ABSENCE OF MR. MUHAMMAD NAVEED, MALI

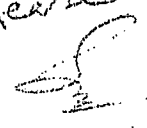
Mr. Naveed, Mali is remained absent from his duty on 4-12-2020 and from 7-12-2020 to till date without any information/application/approval from his incharge and nor from the undersigned.

Submitted for your kind information and further necessary action as per Rules.


Executive Officer
Pakistan Forest Institute

CC:

- 1. APS to Director General, PFI, Peshawar

For n/a please


14/12/20

AD(9)

17/12

Sup dt

Amir-e-
E (3)



GOVERNMENT OF KHYBER PAKHTUNKHWA
Forestry, Environment & Wildlife Department
Pakistan Forest Institute, Peshawar



Ph: +92-91-9221186, Fax: +92-91-9221233

No. 430 /EO(15)/2020

Dated: 28th December, 2020,

Diary No: 1048

To
Mr. Muhammad Naveed,
Mali,
Pakistan Forest Institute,
Peshawar.

Date: 31/12/2020
Section:
P.F.I. Peshawar

Subject: EXPLANATION

It has been noticed that you were again remained absent from your duty without any application/information/approval which is highly objectionable and negligence on your part, your explanation called vide this office letter No.404/E.O(15)/2020, dated 24-11-2020 your absence were converted into leave without pay and warning issue vide Office Order No. 209/F.IV(Per)-Estt, dated 21-12-2020, but you were remained absent from your duty During the month of December, 2020 on the following date:

- 4-12-2020
 - 7-12-2020 to 18-12-2020 and 23-12-2020
- Total 14 days in Dec, 2020

You are directed to explain your position within 03 days after issuance of this letter; that why not you improved your performance, punctuality in government duty and not taking interest in your job, why not a strict disciplinary action may be taken against you under the E&D Rules, 2011 of Khyber Pakhtunkhwa.

[Signature]
Executive Officer
Pakistan Forest Institute

CC:

- 1. The Deputy Director (Tech), PFI, Peshawar
- 2. APS to Director General, PFI, Peshawar

Please submit the reply of the official along with your comments/recommendations.
[Signature]
28/12/20

E-O-

CC: *[Signature]* *[Signature]* *[Signature]* *[Signature]*



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, PESHAWAR

Ph: +92 91 9216123, 9216995, Fax: +92 91 9216203



19

Dated 26/01/2021

No 158/F.IV(Per)-Estt

To

Mr. Muhammad Naveed,
Mali,
Pakistan Forest Institute,
Peshawar.

SUBJECT: ABSENCE FROM DUTY/EXPLANATION

As reported by Executive Officer, Pakistan Forest Institute (PFI), vide his letters No. 424/E.O (40)/2020, dated 14-12-2020 and No. 430/EO(15)/2020, dated 28-12-2020, that you are absent from duty w.e.f 04-12-2020 to date without any prior permission or intimation to the officer concerned. You had been directed by E.O vide Notice/letter No. 404/EO(15)/2020, dated 24-11-2020 to resume your duty immediately and explain your position, but neither you resumed your duty nor informed this office to date.

It is worth mentioning that you are still on probation and as per Sr. No. b&c of offer of appointment letter No. 100/F.VI(247)-Estt, dated 22-10-2019, your services are liable to be terminated at any time without assigning any reasons thereof before the expiry of probation / extended period of probation. Your performance during probation period has remained unsatisfactory. You remained absent for many days from duty during the months of September to November 2020 and your absence was treated as leave without pay with the directions to remain careful in future otherwise strict disciplinary action shall be taken against you vide office order No. 209, dated 21-12-2020. But inspite of all this you are still a habitual absentee and remain absent from duty and have made yourself liable to be terminated from government service as per Sr. No. c of the your appointment letter.

You are, therefore, directed to immediately report for duty and explain your position, otherwise strict disciplinary action will be taken against you under the relevant rules.

Administrative Officer (G)

Copy to:

1. Executive Officer, PFI, Peshawar.
2. APS to Director General, PFI, Peshawar.

(19) (15)

Amir-e-K...



GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, PESHAWAR



Ph: +92 91 9221224, 9216995, Fax: +92 91 9221233

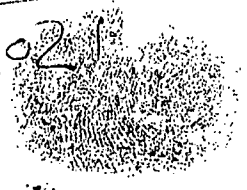
No. 579 /F.IV(Per)-Estt

Dated 7th May, 20

To

Mr. Muhammad Naveed,
Mali,
Pakistan Forest Institute,
Peshawar.

Naveed
7/5/2021



SUBJECT: **SHOW CAUSE NOTICE**

I am directed to refer to the subject noted above and to enclose herewith Show Cause Notice duly signed by the competent authority for information and further necessary action accordingly.

Encl: As Above.

Amir
Administrative Officer (G)

Copy to:

1. Executive Officer, PFI, Peshawar.
2. APS to Director General, PFI, Peshawar.

Amir
5/5/21

Amir
5/5/2021



SHOW CAUSE NOTICE

I Javed Anwar, DG, PFI as Competent Authority, under the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve you Mr. Muhammad Naveed, Mali (BS-03), PFI as follows:

- i. Whereas you got recruited against Deceased's son quota with your brother already working in PFI. It has been reported time & again and noticed for long as per observation by your Officers In-Charge that you do not take interest in your duties. You are a habitual absentee, a malingerer, abusive, insolent rude, querulous character, always misbehaving with your seniors. Your irresponsible attitude towards your duty is evident from various explanations called, the latest ones vide letter No.404/EO(15)/2020, dated 24-11-2020, No.424/EO(40)/2020, dated 14-12-2020, No.430/EO(15)/2020, dated 28-12-2020, No.487/EO(15)/2021, dated 13-04-2021 and warning issued vide Office Order No.209/F.IV(Per)-Estt, dated 21-12-2020.
- ii. You applied for 10 days leave on medical grounds w.e.f. 19-03-2021 to 28-03-2021 and were supposed to join duty on 29-03-2021 but you are absent from duty to date
- iii. You are a known narcotics addict, using intoxicants and lose your senses frequently using foul, indecent, obscene, uncivilized language before your seniors and for female staff. You also cross limits trying to touch and get free with female staff using force & violence at times & resorting to harassment & threats of dire consequences.
- iv. You protect, harbor criminals, gamblers, outlaws & narcotics peddlers, and are involved in thefts and other undesirable activities in Staff Colony and PFI premises.
- v. On the basis of frequent & repeated complaints, and having been kept under surveillance & observation, you have proved that habits die hard and have become incorrigible to be further counselled/advised and retained in

Handwritten signature and date:
3/05/21


Government service as you have created tortuous & unbearable environment for others to survive & live in peace. (17)

vi. After having a meticulous analysis of your doings and personality as mischief monger & examination of personal file, repeated complaints, abnormally violent attitude, indecency, immoral life style, I being Competent Authority am satisfied that conducting formal enquiry would be a totally futile exercise & wastage of time & energy. You appear to be unfit for Government job on the basis of tangible proof on record & repeated complaints by staff both male & female. You appear to be guilty & involved in commission of serious misconduct and acts of Omission & Commission as given below make you liable to be served Show Cause Notice for Offences mentioned:

- a) Inefficiency, unserious & happy go lucky attitude
- b) Misconduct, misbehavior, obscenity, vulgarity, delusions, hallucinations to do acts what sane & sensible people cannot ever imagine to do
- c) Habitually remaining absent & escaping from duty without permission or seeking approval of your senior In-Charge Officers
- d) You have grandiose ideas about yourself and donot bother to seek apology for any wrong done or absence or foul language used, you consider yourself to be always correct & right and the whole world as wrong.

2. Now therefore I, as Competent Authority, in exercise of powers conferred under rule 5 read with rule 7 of the Efficiency & Discipline rules hereby deem it appropriate to dispense with further inquiry into your conduct and have decided tentatively to impose upon you the major penalty of Dismissal from service under rule 4 (b) of the rules ibid. 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 or otherwise. You may submit your written reply within 07 days of receipt of this notice whether you want to avail the opportunity of personal hearing or otherwise. Your reply must reach on expiry of 07 days period or before as deemed appropriate.

3. If no reply to this Notice is received upon termination of 07 days from the date of receipt, it shall be assumed that you have no defense to put in and in that case ex-parte action shall be taken against you as per rules.


DIRECTOR GENERAL 3/10/20

SUBJECT: MEETING OF THE COMMITTEE ON HARASSMENT OF WOMEN AT WORK PLACE OF PFI, PESHAWAR

Meeting of the captioned Committee was held at Pakistan Forest Institute, Peshawar on 31/05/2021 at 11 am in the office of Chairman. The Chairman welcomed the participants and members of the Committee. The Complainant female staff members requested to keep their names secret as they had been assaulted, terrified and harassed and received threats from the accused.

2. It was reported that Muhammad Naveed Mali (BS-03) got recruited against deceased sons' quota with his brother already working in PFI. It was noticed that he was a careless & happy-go-lucky individual, not taking his duty seriously and tried to be free with female staff working at the Pakistan Forest Institute, Peshawar. Actually he was narcotics addict, using intoxicants which changed his behavior, attitude and lost his senses. He did not have control over his actions, he involuntarily became out of control and jumped over female staff with ulterior motives. He frequently used foul, vulgar, indecent, obscene, uncivilized language even before his senior staff and female staff. He crossed limits to touch and get free with female staff using force & violence at times & resorting to harassment and threats of dire consequences when he faced stiff resistance from female staff to defend themselves.

3. He had close relations with notorious criminals, gamblers, outlaws & narcotics peddlers who are involved in thefts and undesirable activities in PFI staff Colony and enter other staff houses assaulting the female staff in absence of male members of the family. He had developed abnormally violent attitude, indecency, and immoral life style.

4. Recommendation:

The Committee observed that the complaints by female staff were based on facts corroborated by the observation by the Committee members at times. The Committee found that the accused Naveed Mali (BS-03) found the job too easily and does not consider himself responsible and disciplined to remain in service. People like him are to be handed over to Police and to languish in Jails or mental hospitals. He is untamed, unruly, rogue, undisciplined, irresponsible, character-less and narcotics addict. He is not fit for Govt. job.

5. The meeting ended on a note of thanks from/ to the Chair.

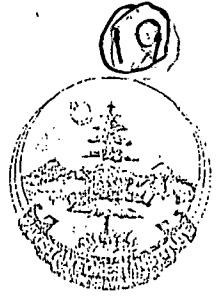
No.	Name of the Officer/Committee Member	Designation	Committee Rank	Signature
1.	Sarwar Raziq	Director Bio. Sciences	Member	<i>Sarwar</i>
2.	Anwar Ali	Director, Forestry Research Div	Member	<i>Ali</i>
3.	Dr. Shafiq Ali Bajwa	DIRECTOR, NTFP	Chairman	<i>Shafiq Ali</i>



Annex - M

GOVERNMENT OF KHYBER PAKHTUNKHWA
FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT
PAKISTAN FOREST INSTITUTE, PESHAWAR

Ph: +92 91 9221224, Fax: +92 91 9221233



Dated 10th June 2021

OFFICE ORDER

No. 96 (F.III(Per)-Estt): WHEREAS, Mr. Muhammad Naveed, Mali (BPS-03), Pakistan Forest Institute (PFI), Peshawar was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, for the charges as mentioned in the Show Cause Notice, served upon him vide No.579/F.IV(Per)-Estt, dated 3-5-2021.

2. AND WHEREAS, the Competent Authority, after scrutiny of the relevant records and documents of the case decided to dispense with the Inquiry proceedings as per Rule 5 (a) of the Rules ibid and served a Show Cause Notice upon the above named accused officer to which he did not like to respond. The accused was provided ample opportunity of personal hearing but he did not care to avail the opportunity of personal hearing after laps of several weeks.

3. AND WHEREAS, the Committee on Harassment of Women at Work Place of PFI, Peshawar, as constituted under Government of Khyber Pakhtunkhwa Protection against Harassment of Women at Workplace Act 2018, recommended that the accused Mr. Muhammad Naveed, Mali (BPS-03) was guilty and not fit for Government Service. He was rogue, character-less and a narcotics addict.

4. NOW, THEREFORE, the Competent Authority, after having considered the charges, evidence on record and recommendation of the Committee on Harassment of Women at Work Place of PFI, Peshawar and exercising his powers under Rule-7(f) read with Rule-4(1)(b)(iv) of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011, deems it appropriate to impose the major penalty of "DISMISSAL FROM SERVICE", upon Mr. Muhammad Naveed, Mali (BPS-03), PFI, Peshawar, for misconduct and involvement in immoral activities, with immediate effect.

-sd-

DIRECTOR GENERAL

ENDST. NO. & DATE EVEN:

A copy is forwarded to:

1. Executive Officer, Pakistan Forest Institute, Peshawar
2. Administrative Officer (B&A), Pakistan Forest Institute, Peshawar
3. APS to Director General, PFI, Peshawar
4. Mr. Muhammad Naveed, ex-Mali, Pakistan Forest Institute, Peshawar