

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE

TRIBUNAL PESHAWAR

Service Appeal No. 836/2022

Israr Hussian

.....(Appellant)

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar etc.....

(Respondents)

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Respondent
Si Muhammad Irshad ACLI
PTS Mansehra

(V)

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

Service Appeal No. 836/ 2022

Israr Hussain..... (Appellant)

VERSUS

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

REPLY BY RESPONDENTS NO. 1 TO 4

RESPECTFULLY SHEWETH:

PRELIMINARY OBJECTIONS:-

- a) That the appeal is not based on facts.
- b) That the appeal is not maintainable in the present form.
- c) That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
- d) That the appeal is barred by law & limitation.
- e) That the appellant is estopped to file the instant Service Appeal by his own conduct.
- f) That the appellant has not come to this Honorable Tribunal with clean hands.
- g) That the appellant has got no cause of action and locus standi to file the instant Service Appeal.

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 2209
Dated 9/12/22

FACTS:-

1. Pertains to service record of the appellant hence no comments.
2. Incorrect, the appellant sent a medical chit through fax wherein he intimated that he is sick and remained in quarantine for 14 days for COVID Treatment. To probe the matter, disciplinary proceedings was initiated in accordance with law/ rules. DSP/ Admin, PTS, Mansehra Samina Zafar was appointed as Enquiry Officer who conducted the enquiry in accordance with law/ rules and submitted findings. The enquiry officer submitted that the appellant was found habitual absentee of 757 days in his service career. Furthermore, the Enquiry Officer also sent medical chit for verification to the Medical Superintendent of Topi Hospital who remarks that 'Bogus entry made' on 30.06.2020 on part of appellant. The enquiry officer also submitted that the appellant did not take interest in performance of official duties. The appellant was

served with Final Show Cause Notice and was heard in orderly room on 15.09.2020. The appellant badly failed to advance plausible reasons in his self defense. After fulfillment of all codal formalities the appellant was awarded with major punishment of dismissal from service with immediate effect vide order dated 15.09.2020. (Copy of order is enclosed as Annexure "A").

3. As already explained in Para No. 2 of Facts that the appellant medical chit was found bogus and the appellant was found habitual absentee therefore he was treated in accordance with law/ rules.
4. Incorrect and misleading. The appellate authority rejected the appeal of the appellant on cogent reasons as the appellant badly failed to advance plausible reasons in his self defense. (Copy of order is enclosed as Annexure "B").
5. Incorrect, the Board meeting was held on 29.03.2022 wherein appellant was heard in person. The appellant contended that he was ill. Perusal of the record revealed that he remained absent for long period of 67 days. He earned 11 bad entries on charges of absence from duty which established that he was habitual absentee and there were no prospects of mending his ways. During the proceedings, he could not submit solid evidence of his innocence. Therefore, his petition was rejected. (copy of order is enclosed as Annexure "C").
6. The instant Service Appeal is not maintainable and liable to be dismissed on the following Grounds.

GROUND:-

- A. Incorrect, as already explained above in Para No. 2 of Facts. Furthermore, the orders passed by the respondents are in accordance with law/ rules/ facts.
- B. Incorrect, as already explained above hence no comments.
- C. As already explained above that medical chit produced by the appellant were found bogus.
- D. Incorrect, as already explained above in Para No. 2 of Facts.
- E. Incorrect and misleading one, the appellant was served with Final Show cause notice by the Competent Authority through District Police Officer, Swabi vide Letter No. 677, dated 13.08.2020, , the appellant appeared before the Director, Police Training School, Mansehra in Orderly Room on 15.09.2020, during personal hearing/ cross questions

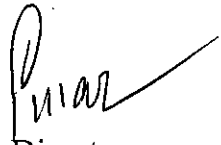
③

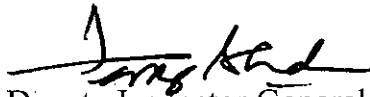
in connection with long deliberate absence and submission of Bogus Medical Chit. The appellant badly failed to submit any plausible grounds therefore, the appellant was awarded with major punishment of dismissal from service in accordance with Police Rules, 1975 (6)(iv).

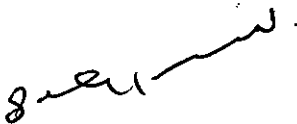
- F. Incorrect. As already explained above that appellant was found habitual absentee and he also produced the fake medical chit therefore, he was proceeded against departmentally. The appellant is not entitled to be reinstated in service.
- G. Incorrect, as already explained above hence no comments.
- H. Incorrect and misleading, the order passed by the competent authority is in accordance with law/ rules.
- I. Incorrect, the departmental proceedings initiated against the appellant on account of his willful absence. A proper departmental enquiry was conducted and after fulfillment of all codal formalities the appellant was awarded with punishment of dismissal from service.
- J. The respondents may also be allowed to raise additional Grounds at the time of hearing of the instant service appeal.

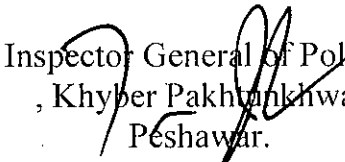
PRAYER:-

Keeping in view the above stated facts and rules it is therefore humbly prayed that the appeal is not maintainable being devoid of merits hence, may kindly be dismissed with costs, please.


Director,
Police Training School,
Mansehra.
(Respondent No. 4)


Deputy Inspector General of Police,
Training, Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 3)


Additional Inspector General of Police,
HQs: Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 2)


Inspector General of Police,
, Khyber Pakhtunkhwa,
Peshawar.
(Respondent No. 1)

AUTHORITY LETTER

Mr. Muhammad Irshad Sub-Inspector/Assistant Chief Law Instructor PTS, Mansehra is hereby authorized to submit Para-wise comments/ reply in Service Appeal No. 836/2022 titled Israr Hussain Ex-FC No. 2/ PTS Mansehra Vs Director, Police Training School, Mansehra etc. and also to defend the instant Service Appeal on behalf of undersigned.



DIRECTOR,
Police Training School,
Mansehra.

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 836/2022

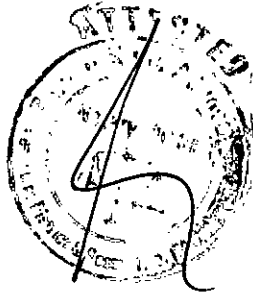
Israr Hussain(Appellant)

VERSUS

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

AFFIDAVIT

I, Muhammad Irshad Sub Inspector Assistant Chief Law Instructor Police Training School Mansehra, do hereby solemnly affirm on oath that the contents of accompanying comments on behalf of respondents are correct to the best of my knowledge and belief. Nothing has been concealed from this Honorable Tribunal.



DEPONENT

A handwritten signature in black ink, consisting of a stylized 'M' and 'I' followed by a horizontal line.

Muhammad Irshad
Sub Inspector, ACLI,
Police Training School,
Mansehra
CNIC No. 13302-0461041-5
Mobile No. 0312-9971944

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PTS



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

No. 5031 /Legal, dated Peshawar, the 07/10/2022.

To:- The Deputy Inspector General of Police,
Training, Khyber Pakhtunkhwa,
Peshawar.

✓ The Director,
Police Training School,
Mansehra.

Subject:- **SERVICE APPEAL NO. 836/2022 TITLED ISRAR HUSSAIN VS INSPECTOR GENERAL OF POLICE, KHYBER PAKHTUNKHWA, PESHAWAR.**

Memo:-

Please notice for **23.11.2022**, in the name of Inspector General of Police, Khyber Pakhtunkhwa, has been received from Service Tribunal Peshawar in the subject cited case.

A responsible officer may be deputed as department representative for attending the Tribunal on date of hearing. Also timely submission of comments may be ensured.

DSP/LEGAL,

For Assistant Inspector General of Police/Legal,
Khyber Pakhtunkhwa, Peshawar

05.10.2022

CLP
Pro a/asthma

Director
PTS
19/10

2022
14-10-22

Issued when sub inspector
Assistant Chief law instructed
M/ action and submit
the comments before the
above date.

Wahid
Chief law
PTS MG
15/10/22

7

"A"

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

No. 1

APPEAL No. 886 of 2022.

Apellant/Petitioner

Versus

RESPONDENT(S)

Notice to Appellant/Petitioner

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

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.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

[Handwritten signatures and notes]

178
12/10/22

(8)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

Peshawar

Service Appeal No. 836 /2022

ISMAEL HUSSAIN Ex Constable (Bugler) No 2 C/O Police Training
School Manshera

.....(Appellant)

V E R S U S

The Provincial Police Officer KPK Peshawar and others

.....(Respondents)

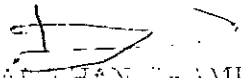
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10.			
11.			

Petitioner

Through


DANIAL KHAN CHAMKANI
Advocate Supreme Court
Peshawar
Cell No 0320199345

Dated: 15/05/2022

SARDAR HUSSAIN

Advocate, High Court

Office: at Judicial Complex Swabi
Manshera

Cell: 03.15680349

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

Peshawar

Service Appeal No _____/2022

ISRAR HUSSAIN son of RAHDAT HUSSAIN Ex Constable (Bugler)

No 2 R/O Topi Moh: Matona Tehsil Topi, District Swabi

.....(Appellant)

V E R S U S

1. The Provincial Police Officer KPK Peshawar.
2. The Additional Inspector General of Police [HQrs] KP Peshawar
3. The Deputy Inspector General of Police Training Directorate Training KP CPO Peshawar.
4. The Director Police Training School Sehno Mansehra .
.....(Respondents)

SERVICE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974 AGAINST THE IMPUGNED ORDER
DATED 15/09/2020 Vide O. Bo. No. 37
WHEREBY THE APPELLANT WAS DISMISSED
FROM SERVICE BY THE RESPONDENT No. 4
DIRECTOR POLICE TRAINING SCHOOL
MANSEHRA.

10

PRAYER IN APPEAL :

on acceptance of the instant appeal, the impugned office order dated 15/09/2020 may graciously be set aside and appellant may also be reinstated in service with all back benefits any other adequate remedy which is not prayed by the appellant in facts / grounds deemed fit may also be granted.

Respected Sir,

Respectfully Sheweth:

FACTS

1. That appellant was serving as Constable in police department and has been performed his duty with great zeal and punctuality out of more than Ten Years of unblemished service.
2. Appellant was absent 14 days from duty, wherein the appellant remained sick due to Cot. 19 Symptom and was quarantined for 14 days sick leave by the Medical Officer of Category C Hospital Topi District Swabi.

(Copy of Medical prescription is annexure "A")

(11) 8

3. That vide OB No 37 dated 15/09/2020 the appellant was dismissed from service under the police rules 1975 [06] by the Respondent No.4 Director Police Training Mansehra

(Copy of impugned dismissal order is annexure "B")

4. That the appellant filed departmental appeal on 20/09/2020 to the Respondent No. 3 i.e. DIG Police Training RP Peshawar against the impugned order dated 15/09/2020 but the same was rejected on 05/11/2020 which shows In letter of rejection order under Rule 11-A dated 14/04/2022 but the departmental appeal rejection letter was not communicated to the appellant and was kept silent as and the appellant came to know later on

(Copy of departmental appeal dated 05/11/2020 is attached as annexure C).

5. That later on the appellant filed a revision petition/ appeal under Rule 11-A police Rules 1975 [amended 2014] to the Provincial Police Officer Khyber Pakhtunkhwa, Peshawar on dated

6. That on 14/04/2022 upon the revision petition the Additional Inspector General of Police (HQrs) Khyber Pakhtunkhwa, Peshawar upheld the Impugned dismissal order of the appellant

(Copy of rejection of revision petition order dated 14/04/2022 is attached as annexure D)

7. That feeling aggrieved from the impugned orders the appellant now failing the instant appeal on the following grounds inter Alia.

GROUNDS :-

- A. That the impugned office orders is against law, facts circumstances unconstitutional and void-initio hence not sustainable in the eye of law as there is no proper inquiry was conducted and the procedure was not adopted hence the impugned order is liable to set aside.
- B. That the impugned office order has been issued on presumption against the appellant was the appellant was not provided fair opportunity for depending himself as per Article 10-A of the constitution , which is against the golden principle of natural justice that no one should be condemned unheard.

- C. That at the time last absence appellant was remained sick due Covid 19 Symptom and was quarantined for 14 days sick leave by the Medical Officer of Category C Hospital Topi District Swab'.
- D. That the enquiry officer was not examined the medical prescription of the appellant as per Category C Topi, Hospital register nor recorded statement of the concern Medical Officer regarding medical checkup.
- E. That the appellant was not served final show cause notice nor given opportunity of personal hearing before the competent authority neither the appellant was cross examine by the enquiry officer and the impugned order was passed in harsh manner but not in accordance with law and rules hence liable to set aside.
- F. That the dismissal from service on the score of absence but such absence was not willful but was due to the compelling circumstances of illness. That absence does not constitute any misconduct when the same is not willful and similarly thousands equally placed employees have been reinstated into their service not only by the department but also by the Hon 'able Tribunal /Court and those judgments were upheld by the apex court.

- G. That is also previously remained ill due to viral infected diseases of Skin for long time and during time to time the appellant requested for sick leave as to avoid from spreading viral infected diseases of Skin to other Police personals but the respondents ignored several times sick leave requests of the appellant and awarded different kind minor penalties which shows in letter dated 22/09/2020.
- H. That the appellant was dismissed from service by the Director Police Training Mansehra with immediate effect on 15/09/2020 and period of different times 67 days absence was considered as Leave without pay, but prior the Impugned dismissal the appellant was awarded different kind of minor penalties and then the absence period of 67 days was considered as Leave without pay as contained in the Impugned order which is double punishment and double jeopardy, thus suchlike double punishment is not tenable in the eye of law and against rules hence liable to be set aside.
- I. That the whole departmental proceedings against the appellant was based on personal ill will and with ill intention and harsh, illegally and major penalty was awarded to the appellant which is the principal of natural justice.

J. That any other ground may be adduced during the course of argument, the kind permission of this Honorable Tribunal

It is therefore very humbly prayed, that the instant appeal of the appellant may graciously be accepted and the impugned officer order dated 15/09/2020 may also be set aside and the appellant may kindly be reinstated into service with all back benefit.

Any other relief as deemed appropriate in the circumstances of the case not specifically asked for may also be granted to appellant.

Appellant

Through

Dated: /05/2022

DANIAL KHAN CHAMKANI
Advocate Supreme Court
Peshawar



SARDAR HUSSAIN
Advocate, High Court
At Judicial Complex Swabi.

BEFORE THE SERVICE TRIBUNAL-KHYBER PAKHTUNKHWA
Peshawar

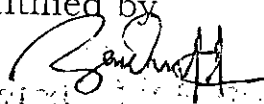
Service Appeal No _____ /2022


ISRAR HUSSAIN son of **RAHDAT HUSSAIN** Ex Constable (Bugler)
No.2 C/O Police Training School Manshera
.....(Appellant)

V E R S U S

The Provincial Police Officer KPK Peshawar and others
.....(Respondents)

AFFIDAVIT
I, **ISRAR HUSSAIN** son of **RAHDAT HUSSAIN** Ex Constable
(Bugler) No. 2 C/O Police Training School Manshera resident of
village Topi, Mchallah Matona, Tehsil Topi, District, do hereby
solemnly affirm and declare that the contents of the **Service Appeal**
are true and correct to the best of my knowledge and belief and
nothing has been concealed from this Hon'ble Tribunal.

Identified by

Sardar Hussain Advocate
High Court
At Judicial Complex Swabi


Deponent
ISRAR HUSSAIN
CNIC NO: 16202-2123279-7
.....
.....
.....

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

Peshawar

Service Appeal No _____/2022

ISRAR HUSSAIN son of RAHDAT HUSSAIN Ex Constable (Bugler)
No 2 C/O Police Training School Manshera
.....(Appellant)

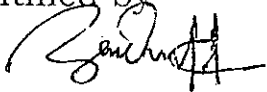
V E R S U S

The Provincial Police Officer KPK Peshawar and others
.....(Respondents)

AFFIDAVIT

I, **ISRAR HUSSAIN son of RAHDAT HUSSAIN** Ex Constable (Bugler) No 2 C/O Police Training School Manshera resident of village Topi, Mchallah Matona, Tehsil Topi, District, do hereby solemnly affirm and declare that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Identified by



Sardar Hussain Advocate
High Court
At Judicial Complex Swabi



Deponent

ISRAR HUSSAIN

CNIC NO 16202-2123279-7

(17) 9

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

Peshawar

Service Appeal No _____/2022

ISRAR HUSSAIN Ex Constable (Bugler) No 2 C/O Police Training
School Manshera

.....(Appellant)

V E R S U S

The Provincial Police Officer KPK Peshawar and others

.....(Respondents)

ADDRESSES OF PARTIES

PETITIONER:

ISRAR HUSSAIN son of **RAHDAT HUSSAIN** Ex Constable
(Bugler) No 2 R/O Topi Moh: Matona Tehsil Topi, District
Swabi

RESPONDENTS:

1. The Provincial Police Officer KPK Peshawar.
2. The Additional Inspector General of Police [HQrs] KP
Peshawar
3. The Deputy Inspector General of Police Training
Directorate Training KP CPO Peshawar.
4. The Director Police Training School Sehno Mansehra .

Appellant

Through

Dated: 13/05/2022

DANIAL KHAN CHAMKANI
Advocate Supreme Court
Peshawar

SARDAR HUSSAIN
Advocate, High Court
At Judicial Complex Swabi.

18 ANNEXURE 'A'

(11)

A

Test
report

CATEGORY "C" HOSPITAL-TOPI DISTT. SWABI
OPD Chit Rs. 10/-


Name Bran Sex M
Age 40 Date 30-06-2020
Disease Fever, cough,
Monthly OPD Serial No 642-26

CIR	Diagnosis/Findings/Prescription/Treatment/Advice/ Test Findings
	inj. Decadron 1/4 stat.
	inj. Provan
	inj. Oxidil 1 gram 19/3/20
	inj. Pilsce
	inj. Gharivir
	inj. Pladex
	1/4 Cannula
	inj. Methylpred 1/4 stat
	Advice and Home Isolation for 14 days

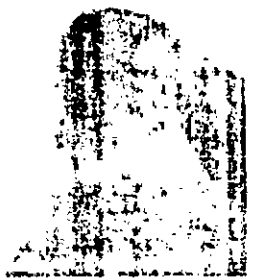
exam +
cough +
sputum +
throat
swollen

Adm
Chit

Admission


DIRECTOR
Police Training School
Muzaffargarh

13/07/2020



(19)

ANNEXURE B II

During absence on 13.07.2020, you sent a medical chit through fax and received arrival report that you are sick and remained in quarantine 14 days for COVID treatment. Disciplinary proceeding started against you. DSP Admin Samina was appointed as Enquiry officer. Enquiry officer found you habitual absentee of 757 days in your service. Enquiry officer sent the medical chit to Medical Superintendent of Hospital Topi for verification vide this office Memo: No. 19, dated 04.08.2020. Officer Category "C" Hospital Topi remarks that "Bogus entry made on Sr. # 6 on 30.06.2020 on patient Israr is bogus attached with enquiry files.

The Enquiry officer found you guilty of gross misconduct and in finding rejected that defaulter Constable is not taking any interest towards his assigned duties and absented himself from duty for the period of 757 days during his previous service.

You remained dismissed from service Vide OB No. 18, dated 14.05.19 re-instated on 29.07.19 vide OB No. 58, dated 29.08.19.

Recently you are also absented himself from your lawful duties from 22.07.2020 (29 days) and from 04.08.2020 to 10.09.2020 (38 days) (Total absence -

Delinquent Bugler Constable appear before the Enquiry Officer and given statement which is not satisfactory due to which he found guilty. The defaulter Constable Israr Hussain No. 02 was served with Final Show Cause Notice on his person through District Police Officer Swabi vide this office Memo: No. 677, dated 13.08.2020.

The defaulter Constable Bugler Israr Hussain No. 2, appear before the undersigned Orderly Room on 15.09.2020, during personal hearing/cross questions in connection long deliberate absence and submission of Bogus Medical Chit. He failed to satisfy undersigned.

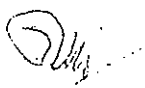
Due to above mentioned reasons departmental proceeding have taken against exercise of the power vested in me under Police Rule 1975 (6) (iv). He is hereby punished with punishment of dismissal from service with immediate effect. Period of absence 67 days as leave without pay.

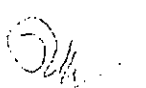
Order Announced.

OB No. 37

Dated 15-9-2020

1. Copy submitted to the Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa Peshawar for favour of information:-
2. PO/ SRC/ PTS Manshehra for further necessary action.
3. RI PTS Manshehra for necessary action.


DIRECTOR
Police Training School
Manshehra


DIRECTOR
Police Training School

خدمت جناب ڈپٹی انسپکٹر جنرل پولیس صاحب (ایپیلٹ انفارمی) K.P.K پشاور

اسرار حسین ولد راجہ دست حسین (ہنگولہ) ساکن ٹوپی ضلع مہوالی ہنگولہ سرحد
تعمیرہ پی۔ ٹی۔ ایس مانسہرہ

نام

ڈاکٹر میڈیکل پولیس ٹریننگ سکول مانسہرہ
(ریسپانڈنٹ)

ڈیپارٹمنٹل ایپل بر خلاف حکم بر طرفی ایپلنٹ مورخہ 2019.3.19 نمبری
98-95 جسکی رو سے ایپلنٹ کو غیر موقعی غلط طور خلاف انصاف - بلا اطلاع
و سنواری کا موقع دئے بغیر (Condemned Unheard) بلا انعقاد قانونی انٹروی
ایپلنٹ کو بر طرف کیا گیا ہے

استدعا ایپل :- منظور کی ایپل حکم ریسپانڈنٹ کو خلاف قانون خلاف انصاف
اور سبھی برہنہ اور غیر موقع دئے قرار دیکر جسکو فرمایا جائے ایپلنٹ کو جملہ
Back Benefit بشمول سینیاری کے ساتھ اپنی ملازمت پر بحال فرمایا جائے

جناب عالی ! ایپلنٹ ص ب ذیل عرض کرتا ہے

1) برکے ایپلنٹ پولیس ٹریننگ سکول مانسہرہ میں بطور (ہنگولہ) از مورخہ 10/2017

فائدہ کہ ایپلائٹ گذشتہ سال لاک ڈاؤن میں بڑا بھاری سے مبتلا ہو کر اپنی ڈیوٹی سے حاضری تھا۔

کہ ایپلائٹ نے اس بابت اپنے آفسران مجاز کو زبان طور پر آگاہ کر کے ہونے رکھتے تھے (طلب کرتا رہا ہے۔

کہ ایپلائٹ لاک ڈاؤن ماہ 4/8 میں شدید بھاری سے مبتلا ہوا اور طبی کی رسید دیا گیا۔ جو کہ سائل نے مجاز آفسر کو دے دیا۔

ایپلائٹ کے لاک ڈاؤن کے دوران سٹاف کیساتھ ڈیوٹی کر چکا ہے۔

میڈم ٹینڈ ظفر نے بتایا تھا کہ سب سٹاف نمبر کیساتھ ڈیوٹی کر رہے ہیں جہاں تک سٹاف ڈیوٹی کیا ہوا ہے۔ جو کہ پی۔ پی۔ ایس روزنامہ میں ریکارڈ درج ہے۔

ایپلائٹ کا 5 مہینے کا معذراہ میڈم ٹینڈ ظفر نے سٹاف کیا تھا۔

اور ایپلائٹ نے معذراہ دینے کو میڈم ٹینڈ ظفر کو سٹاف ہاؤس کے گان گلوں شروع کرنی

کہ ایپلائٹ نے لاک ڈاؤن کے دوران موٹر سائیکل پر بھی ڈیوٹی جاتے کیا گیا ہے

لاک ڈاؤن میں سارا سٹاف گھر میں رہا۔ اور میڈم نے بتایا تھا کہ نمبر کیساتھ

ڈیوٹی دانی ڈیوٹی کر رہے ہیں ڈیوٹی سرانجام دیا ہے۔

OB-37

یہ کہ حکم مورخہ ۰۹-۰۹-۵۵ء نمبری من جلد ۱۰ پر واقعات مجموعہات

ذیل خلاف قانون، خلاف واقعات، بلا اختیار اور فوری اموال النصاب
(Principle of natural Justice) اور یا بھی تضادات پر مبنی ہونے کے بنا پر ناقابل
اعتدال کے قابل نہیں ہے۔ اور ایپلینٹ جج (Bench) کے ساتھ
پر ایمان کا اعتبار ہے۔

مجموعہات سے یہ کہ حکم بر طرف ایپلینٹ خلاف قانونی برخلاف واقعات اور
مبنی پر بد نہیں ہے۔

یہ کہ ایپلینٹ کو وہی بابت انوکھی قانونی نوٹس / اطلاع بروقت نہیں دیا گیا ہے۔
یہ کہ ایپلینٹ کے بر طرف سے قبل بابت انوکھی نہ ہی کوئی اطلاع یا اشتہار جاری کیا گیا ہے
اور نہ ہی اس بر طرف پر اسے حکم کے اٹھانے پر کوئی اطلاع دیا گیا ہے۔
اور نہ ہی کوئی اشتہار دیا گیا ہے۔

یہ کہ عدولہ انوکھی اصل بدعت مکتوبہ نظم میڈیم پی ٹی ایس۔ ماہنامہ کے دوران ایپلینٹ
انوکھی آفتور کو اپنی مجموعی / ہماری کے باعث اپنی ملازمت سے غیر عادی کو بابت مکتوبہ
دیا۔ اور ایسی انوکھی میں ایپلینٹ کے ملازمت سے بر طرف کو کوئی اشتہار نہیں دیا گیا ہے
جبکہ موخر الذکر انوکھی کے بابت ایپلینٹ کو علم تھا۔

(6) یہ کہ ایئرلائٹ کی غیر جانبداری مقصداً نہ تھی بلکہ بوجھات مذکورہ بالا ہی -

میڈیم کی لیڈر نے ایئرلائٹ کو بتایا کہ ہمارے لیے پورے لفٹ لادوس میں میڈیم
آہی انٹوائٹری ختم کر دیا گیا ہے ایئرلائٹ نے اسکو بتایا کہ مشین لینے والا اور دینے
والا دونوں جینی ہے - ایئرلائٹ نے انکار کیا -

یہ کہ ایئرلائٹ اپنے افسران ہزار کے احکامات اور بھٹائی اپنی ملازمت
جاری رکھنے کا مقصد ہے -
ایئرلائٹ ⁽³⁾ تین بچوں کا باپ ہے اور اپنے کنبے کا واحد کنبال ہے -

لیڈر اسعد علی ہے کہ بوجھات بالا من جملہ دستگیر بوجھات جو کہ بوجھات بالا
پیشی ایئرلائٹ پیش کرے گا - اپنی ملازمت پر جملہ ~~Back Demand~~
کے ساتھ بھالہ فرمایا جائے - ساتھ دعا کر رہا گا -

FC کا کسٹومل ڈسٹریکشن لائسنس شاف P.T-3 حوالہ -
Date - 20/9/2020
mob.No - 03109347609 / 03118235051



24

THE DIRECTORATE OF TRAINING,
KHYBER PAKHTUNKHWA, PESHAWAR.
Email: dspturbasic@gmail.com

20 D 101
order

No. 9073 Dated 05/11/2020 Phone & Fax No. 091-9211268

ORDER

This order shall dispose-off the department appeal/application, preferred by ~~EC/Israr~~ Constable Israr Hussain No.2 of Line Staff PTS, Manshehra against the major punishment of dismissal from service vide OB No.37 dated 15/09/2020 passed by Director, PT Manshehra.

Brief facts of the case are that the appellant/applicant during his absence on 13.07.2020, sent a medical chit through fax and stated in arrival report that he was sick and remained in quarantine for 14 days due to COVID-19 symptom. Disciplinary proceedings were initiated against the appellant/applicant. DSP Admin. Mrs. Samina Zafar Bukhari was appointed as an Enquiry Officer. During the enquiry, the appellant/applicant was found a habitual absentee of 757 day absence during his service. The Enquiry Officer sent the medical chit to Medical Superintendent Category "C" Hospital Topi for verification vide Office Memo: No.19, Dated 04.08.2020. The Medical Officer Category "C" Hospital, Topi remarked that entry made on Sr.No.642-26, Dated 30.06.2020 on patient Israr has not been entered in the Hospital Register and as such is bogus.

The Enquiry Officer found the appellant/applicant guilty of gross misconduct and as per the findings report prove that the defaulter Constable was not taking interest towards his assigned duties and absented himself from duty for a period of 757 days during his previous service.

The appellant/applicant was previously dismissed from service Vide OB No.18, dated 14.03.2019 and reinstated into service on 29.07.2019 vide OB No.58, dated 29.08.2019.

Recently, the applicant/applicant absented himself from his lawful duty from 22.06.2020 to 21.07.2020 (29 day) and from 04.08.2020 to 10.09.2020 (38 days) with a total absence of 67 days.

The appellant/applicant appeared before the Enquiry Officer and submitted his written statement which was not found satisfactory and the appellant/applicant was found guilty and, hence, was served with Final Show Cause Notice on his home address through District Police Officer, Swabi vide Memo: No.677, dated 13.08.2020.

The appellant/applicant was afforded an opportunity of personal hearing and on 15.09.2020 The appellant/applicant appeared for personal hearing but failed to satisfy the Director, PTS, Manshehra.

In view of the reasons stated above and conclusion of the department proceedings the Director, PTS, Manshehra exercise of powers vested in him under Police Rules, 1973 (6)(iv) awarded major punishment of dismissal from service with immediate effect vide OB No.37 dated 15.09.2020 and his period of absence of 67 days was treated as Leave Without Pay. The appellant preferred an appeal/application against the said order to the undersigned.

I have gone through the appeal and relevant record as well as the comments received from AIG, Training and I am therefore, in full agreement with the Order of Director, PTS Manshehra.

Therefore, in view of the above I, **MUHAMMAD IMTIAZ SHAH, PSP/QPM**, Deputy Inspector General of Police, Directorate of Training, Central Police Offices, Peshawar, appellate authority, dismiss the appeal of ~~Ex-FC/Israr~~ **Constable Israr Hussain No.2** of Line Staff PTS, Manshehra and maintain the order of dismissal passed by Director, PT Manshehra dated 15.09.2020.

ORDER ANNOUNCED

MUHAMMAD IMTIAZ SHAH, PSP/QPM,
Deputy Inspector General of Police,
Directorate of Training,
Central Police Offices, Peshawar

No. 9074-77 /Trg: dated: 25 / 11 / 2020.

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

1. Assistant Inspector General of Police, Training Khyber Pakhtunkhwa
2. Director PTS Manshehra.
3. Dy. Superintendent of Police, Training Khyber Pakhtunkhwa
4. P.A to DIG/Training, Training Khyber Pakhtunkhwa.

MUHAMMAD IMTIAZ SHAH, PSP/QPM,



25



ANNEXURE 'D'

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

JC
Ji
DPA

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-FC (bugler) Israr Hussain No. 2. The petitioner was dismissed from service by Director, Police Training School, Mansehra vide OB No. 37, dated 15.09.2020 on the allegations that he while posted at Police Training School, Mansehra during his absence on 13.07.2020, sent a medical chit through fax and stated in his arrival report that he was sick and remained in quarantine for 14 days due to Covid-19 symptom. During enquiry proceedings, his medical chit was sent to Medical Superintendent, Category "C" Hospital Topi for verification vide letter No. 19, dated 04.08.2020. The Medical Officer Category "C" Hospital Topi remarked that the entry made on Sr. No. 642-26, dated 30.06.2020 on patient Israr has not been entered in the Hospital Register and as such is bogus. He remained absent from duty w.e.f 22.06.2020 to 21.07.2020 and 04.08.2020 to 10.09.2020 (67-days). During his previous service he was remained absent for 757 days. His appeal was rejected by Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar vide order No. 9073-77/Trg; dated 05.11.2020.

Meeting of Appellate Board was held on 29.03.2022 wherein petitioner was heard in person. Petitioner contended that he was ill.

Perusal of the record revealed that he remained absent for long period of 67 days. He has earned 11 bad entries on charges of absence from duty which establishes that he is habitual absentee and there is no prospects of mending his ways. During the proceedings, he could not submit solid evidence of his innocence. Therefore, the Board decided that his petition is hereby rejected.

Sd/-

SABIR AHMED, PSP

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

No. S/ 762-68 /22, dated Peshawar, the 14 /14 /2022.

Copy of the above is forwarded to the:

1. Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar.
2. Director, Police Training School, Mansehra. One Service Roll and one enquiry file containing 36-pages of the above named Ex-FC received vide your office Memo: No. 1644, dated 09.11.2021 is returned herewith for your office record.
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.

65/1091

(IRFAN TARIQ) PSP

AIG/Establishment,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

بخدمت جناب انسپکٹر جنرل آف پولیس صاحب (اسپیلٹ اتھارٹی)
اسرار حسین ولد راحت حسین (بیگولر) ساکن ٹوپن ضلع صوابی بیلٹ نمبر 02 متعینہ پی ٹی ایس مانسہرہ (سائل)

بنام
ڈائریکٹر پولیس ٹریگ سکول مانسہرہ
(رسپانڈنٹ)

ڈیپارٹمنٹل ایپل بر خلاف حکم برطرفی ایپلانٹ مورخہ 15.09.2020 حکم جناب ڈپٹی انسپکٹر جنرل پولیس مردان ڈویژن مردان جس کی وجہ سے ایپلانٹ کو غیر قانونی غلط طور پر خلاف واقعات بلا اطلاع دشمنی کا موقع دئے بلا انعقاد قانونی انکوائری ایپلانٹ کو برطرف کیا گیا ہے استدعا ایپل منظور کی ایپل حکم رسپانڈنٹ کے خلاف قانونی واقعات اور مٹی برقی اور بغیر موقع دئے قرار دیکر منسوخ فرمایا جا کر ایپلانٹ کو جملہ (Back Benefit) بشمول تنیاری کے ساتھ اپنی ملازمت پر بحال فرمایا جائے۔
جناب عالی! ایپلانٹ حسب ذیل عرض کرتا ہے۔

۱۔ یہ کہ ایپلانٹ پولیس ٹریگ سکول مانسہرہ میں بطور پیوگر از مورخہ 12.10.2012 تعینات ہو کر اپنے فرائض انتہائی خوش اسلوبی و یانداری اور اپنے افسران بالا کے مکمل اطمینان کی حد تک سرانجام دیتا رہا ہے۔

۲۔ یہ کہ ایپلانٹ گزشتہ سال لاک ڈاؤن میں بڑا بخار میں مبتلا ہو کر اپنی ڈیوٹی سے قاصر تھا۔

۳۔ یہ کہ ایپلانٹ نے اس بابت اپنے افسران مجاز کو زبانی طور پر آگاہ کر کے ہونے والی رخصت (چھٹی) طلب کرنا رہا۔

۴۔ یہ کہ ایپلانٹ لاک ڈاؤن ماہ 08.04.2020 میں شدید بخار میں مبتلا ہوا کہ میڈیکل رسید دیا گیا جو کہ سائل نے مجاز آفسر کو دے دیا۔

۵۔ ایپلانٹ کے لاک ڈاؤن کے دوران سٹاف کے ساتھ ڈیوٹی کر چکا ہے۔ میڈیٹھم ٹیفر صاحبہ نے بتایا تھا کہ سب سٹاف نمبر کے ساتھ ڈیوٹی کر رہے ہیں سٹاف کے ساتھ ڈیوٹی کیا ہوا ہے جو کہ پی ٹی ایس روزنامہ میں ریکارڈ درج ہے ایپلانٹ کا ۲ مہینے کا تنخواہ دینے کو میڈیٹھم ٹیفر صاحبہ نے سٹاف کیا تھا۔ اور ایپلانٹ نے تنخواہ دینے کو میڈیٹھم صاحبہ کو کہا تو میڈیٹھم صاحبہ نے گالی گلوچ شروع کی تھی۔

۶۔ یہ کہ ایپلانٹ نے لاک ڈاؤن کے دوران موٹر سائیکل پر بھی ڈیوٹی جاکر کیا گیا تھا لاک ڈاؤن میں سارا سٹاف گھر میں رہا اور میڈیٹھم نے بتایا تھا کہ غیر کے ساتھ ڈیوٹی دایر ڈیوٹی کر رہے ہیں ڈیوٹی سرانجام دیا ہے۔

۷۔ یہ کہ حکم مورخہ 15.08.2020 حکم ڈپٹی انسپکٹر جنرل مورخہ 05.11.2020 من جملہ دیگر واقعات جو بڑھات ذیل خلاف قانون، خلاف ان واقعات بلا اختیار اور ذاتی اصول انصاف اور باہمی تضادات پر مبنی ہونے کی بنا پر ناقابل پزیرائی ہے بلکہ قابل منسوخ ہے اور ایپلانٹ جملہ Back Benefit کے ساتھ پر بحالی کا حقدار ہے۔

وجوہات:

۱۔ یہ کہ حکم برطرفی ایپلانٹ خلاف قانون بر خلاف واقعات اور مٹی بر بدلتی ہے۔

۲۔ یہ کہ ایپلانٹ کو نہ ہی بابت انکوائری قانونی نوٹس اطلاع بروقت نہیں دیا گیا ہے۔

۳۔ یہ کہ ایپلانٹ کی برطرفی سے قبل بابت انکوائری نہ ہی کوئی اخباری اشتہار جاری کیا گیا ہے اور نہ ہی ایس بر طرفی پر اس کے کھر کے ایڈریس پر اپنی اطلاع دی گئی ہے۔

یہ کہ مملوہ انکوائری اول بدست ثمنیہ ظفر میڈم پی ٹی ایس مانسہرہ کے دوران ایپلانٹ انکوائری آفیسر کو اپنی مجبوری بیماری کے باعث اپنی ملازمت سے غیر ماضی کو بابت مطمئن کر چکا تھا۔ اور اسی انکوائری میں ایپلانٹ کی ملازمت سے برطرفی کی کوئی سفارش نہیں کی گئی ہے

ایپلانٹ تین بچوں کا باپ ہے اور اپنے کہے کا واحد کفیل ہے

لہذا استدعا ہے کہ بوجوہات بالا من جملہ دیگر وجوہات جو کہ بوجوہات بالا پیش ایپلانٹ پیش کرے گا اپنی ملازمت پر جملہ Back Benefit کے ساتھ بحالی فرمایا جائے

اسرار حسین
سائل دعا گور ہے گا۔
اسرار حسین لائن سٹاف PTS مانسہرہ

(27) 18

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
Peshawar

Service Appeal No _____/2022

ISRAR HUSSAIN Ex Constable (Bugler) No 2 C/O Police Training
School Manshera
.....(Appellant)

V E R S U S

The Provincial Police Officer KPK Peshawar and others
.....(Respondents)

=====

To,

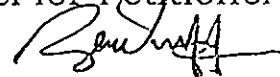
1. The Provincial Police Officer KPK Peshawar.
2. The Additional Inspector General of Police [HQrs] KP Peshawar
3. The Deputy Inspector General of Police Training Directorate Training KP CPO Peshawar.
4. The Director Police Training School Sehno Mansehra .

Subject :NOTICE FOR FILING SERVICE APPEAL

That the petitioner is filling SERVICE APPEAL before Service Tribunal KPK Peshawar , therefore you are hereby informed through this notice along with relevant record regarding the filling to above Service Appeal .

Dated : 13.05.2022

Counsel for Petitioner



SARDAR HUSSAIN
Advocate, High Court
Office: at Judicial Complex Swabi
Shahmansoor
Cell: 03115680349

کتابخانه شخصی

روز ۱۳ اردیبهشت ۱۳۵۹

مردم و هیئت مدیره و مدیران محترم
 در روز ۱۳ اردیبهشت ۱۳۵۹ در وقت ۱۱:۳۰ صبح در محل
 اجتماع گردیدند و در این جلسه آقایان ...
 اعلام کردند که ...
 اعتبارات ...
 در روز ۱۳ اردیبهشت ۱۳۵۹ در وقت ۱۱:۳۰ صبح در محل

صورتجلسه

توسط ...

تصویب شد

۱۳۵۹ / ۲ / ۱۳

8

ذیل کے بر خلاف شاف اپناٹ ضلع

رپورٹ کی راجیو کے ذریعہ دی گئی ہے۔

تفصیل مضمون کے تحت ہے۔

کئی نوٹوں کے ساتھ ہے۔

انہوں نے اس بارے میں کہا ہے۔

یہ سب باتیں اس کے ساتھ ہیں۔

ان کے ساتھ ساتھ ہے۔

یہ سب باتیں اس کے ساتھ ہیں۔

ان کے ساتھ ساتھ ہے۔

یہ سب باتیں اس کے ساتھ ہیں۔

ان کے ساتھ ساتھ ہے۔

یہ سب باتیں اس کے ساتھ ہیں۔

ان کے ساتھ ساتھ ہے۔

یہ سب باتیں اس کے ساتھ ہیں۔

ان کے ساتھ ساتھ ہے۔

یہ سب باتیں اس کے ساتھ ہیں۔

ان کے ساتھ ساتھ ہے۔

اجاب عالی۔

تفصیل برطانوی اصل ہے۔

Sis

Fuzonzelezi

Francis

13/01/2020

ذیل

کئی نوٹوں کے ساتھ

✓

13/01/2020



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OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

46

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by **Ex-FC (bugler) Israr Hussain No. 2**. The petitioner was dismissed from service by Director, Police Training School, Mansehra vide OB No. 37, dated 15.09.2020 on the allegations that he while posted at Police Training School, Mansehra during his absence on 13.07.2020, sent a medical chit through fax and stated in his arrival report that he was sick and remained in quarantine for 14 days due to Covid-19 symptom. During enquiry proceedings, his medical chit was sent to Medical Superintendent, Category "C" Hospital Topi for verification vide letter No. 19, dated 04.08.2020. The Medical Officer Category "C" Hospital Topi remarked that the entry made on Sr. No. 642-26, dated 30.06.2020 on patient Israr has not been entered in the Hospital Register and as such is bogus. He remained absent from duty w.e.f 22.06.2020 to 21.07.2020 and 04.08.2020 to 10.09.2020 (67-days). During his previous service he was remained absent for 757 days. His appeal was rejected by Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar vide order No. 9073-77/Trg; dated 05.11.2020.

Meeting of Appellate Board was held on 29.03.2022 wherein petitioner was heard in person. Petitioner contended that he was ill.

Perusal of the record revealed that he remained absent for long period of 67 days. He has earned 11 bad entries on charges of absence from duty which establishes that he is habitual absentee and there is no prospects of mending his ways. During the proceedings, he could not submit solid evidence of his innocence. Therefore, the Board decided that his petition is hereby rejected.

Sd/-

SABIR AHMED, PSP

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

No. S/762-68/22, dated Peshawar, the 14/4/2022.

Copy of the above is forwarded to the:

1. Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar.
2. Director, Police Training School, Mansehra. One Service Roll and one enquiry file containing 36-pages of the above named Ex-FC received vide your office Memo: No. 1644, dated 09.11.2021 is returned herewith for your office record.
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.


05/04/22

(IRFAN TARIQ) PSP

AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

SR
22/4/2022
Director
Police Training School
Mansehra
23/2



OFFICE OF THE DIRECTOR, POLICE TRAINING SCHOOL, MANSEHRA

No. 16414 /dated Mansehra the 9-11- 2021.

To: The Assistant Inspector General of Police,
Training, Khyber Pakhtunkhwa, Peshawar.

Office of The
Dy: Inspector General Of Police
Training, Khyber Pakhtunkhwa,
Peshawar.

Subject: **REVISION PETITION.**

Dy: No 5085 /Trg

Memo:

Dt 10-11-2021

Kindly refer to your office Endst: No. 4613/Trg, dated 05.05.2021 and this office Memo: No. 1045, dated 28.07.2021.

It is submitted that Para wise comments on the revision petition of Ex. Constable Bugler Israr Hussain No. 02 are mentioned below as desired please.

1. **Correct**, The Petitioner was enlisted on 28.01.2012, but he absented himself from duty time and again throughout his service.
2. **Incorrect**, During the absence on 13.07.2020 he sent to Enquiry Officer a medical chit through Fax and recorded in his arrival report that he was sick and remained Quarantined 14 days for Covid-19 treatment. The Enquiry Officer sent the Medical Chit to Medical Superintendent Category "C" Hospital Tehsil Topi District Swabi for verification vide this office Memo: No. 19, dated 04.08.2020. The Medical Officer remarks that bogus entry on Serial No. 642-26, dated 30.06.2020.
3. **Incorrect**, He did not contact to his high-ups for leave/permission verbally or written.
4. **Incorrect**, No information regarding his illness was received during lockdown.
5. **Incorrect**, He is habitual absentee. That he also remained absented himself from duty w.e.from 22.06.2020 to 21.07.2020 (29 days) and from 04.08.2020 to 10.09.2020 (38 days).
6. **Correct**, The salary of Petitioner was stopped due to his prolong absence.
7. **Incorrect**,
8. **Incorrect**,
9. That all the process of enquiry was initiated according to disciplinary rules and regulations.
10. The departmental appeal of Petitioner was rejected vide DIG Training Khyber Pakhtunkhwa Peshawar, office order No. 9073-77/Trg, dated 05.11.2020.

Furthermore all the Codal formalities were fulfilled during enquiry and the defaulter Constable was also given opportunity of appearance. Final Show Cause Notice was issued on 15.09.2020 for personal hearing/cross questions in connection with his long deliberate absence and submission of bogus medical chit, but he failed to satisfy the undersigned.

Moreover he also remained dismissed from service vide OB No. 18, dated 14.03.2019 due to his absence. In view of above the appeal in hand may kindly be dismissed being badly time barred and without any legal footings please.

Encl:-

1. Service Roll= 1
2. Enquiry Papers = 36 Pages



DIRECTOR
Police Training School
Mansehra

فائنڈنگ رپورٹ

انکوائری ازاں اسرار احمد نمبر 02 بنگر پی ٹی ایس مانسہرہ

جناب عالی:-

انکوائری عنوان بالا میں معروض خدمت ہوں کہ مذکورہ کنسٹیبل اسرار احمد نمبر 02 بنگر غیر حاضر بحوالہ مد نمبر 18 روزنامہ 2020-06-22 ہو کر دوران غیر حاضری ایک میڈیکل بذریعہ فیکس مورخہ 13-07-2020 کو سنٹر ہذا بھجوایا۔ مذکورہ کے میڈیکل چٹ پر جناب نے انکوائری کا حکم صادر فرمایا۔ انکوائری موصول ہونے پر مذکورہ کی غیر حاضری مد روزنامہ سے منگوائی۔ مذکورہ مد نمبر 24 روزنامہ 2020-07-21 کو سنٹر ہذا میں آ کر اپنی حاضری کی۔ مذکورہ کی گل غیر حاضری 29 دن بنتی ہے۔ اپنی حاضری میں کورونا بیماری کا ذکر کیا ہے۔ اسی طرح دوران انکوائری تحریری بیان میں بھی کھانسی بخار وغیرہ کا ذکر تھا جس پر ڈاکٹر صاحب نے کورونا بیماری کا علاج شروع کر کے 14 یوم قرنطینہ کا تحریر کیا اور ساتھ ہی ایک لیبارٹری ٹیسٹ بھی پیش کیا جس پر پروٹین وغیرہ کا ذکر ہے۔ میڈیکل چٹ اور لیبارٹری رپورٹ کو چیک کیا گیا جس پر کسی بھی ڈاکٹر کا دستخط یا مہر نہیں تھا جس وجہ سے یہ شک ہوا کہ مذکورہ میڈیکل رپورٹ مشکوک ہے۔ اس طرح بحوالہ لیٹر نمبر 19 مورخہ 04-08-2020 کو میڈیکل سپرنٹنڈنٹ کیلنگری سی ہسپتال ٹوپی کو بغرض تصدیق میڈیکل تحریر کیا گیا جس پر بعد تصدیق ایم ایس کیلنگری سی ہسپتال ٹوپی نے میڈیکل کا بوگس ہونا تحریر کیا۔ رپورٹ ایم ایس ہمراہ لف انکوائری قابل ملاحظہ مارک "A" ہے۔ مذکورہ کا سروس ریکارڈ SRC سے طلب کیا۔ ریکارڈ کے مطابق مذکورہ 752 یوم غیر حاضرہ کر مختلف قسم کی سزائیں دی جاتی رہی ہیں۔ مذکورہ کا تفصیلی ریکارڈ ہمراہ لف قابل ملاحظہ ہے۔ جدید غیر حاضری میں بھی مذکورہ نے ایک بوگس میڈیکل پیش کر کے غیر حاضری سے بچنے کا بہانہ بنایا جو تصدیق کرنے پر بوگس نکلا۔ مذکورہ کا سروس ریکارڈ اور مذکورہ کا یہ بوگس میڈیکل اس بات کو ظاہر کرتا ہے کہ کنسٹیبل نوکری میں دلچسپی نہیں رکھتا اور عادی غیر حاضر باش ہے۔ انکوائری میں قصور وار پایا جاتا ہے۔

انکوائری گزارش خدمت ہے۔

۱۱/۱۱/۲۰۲۰
(شمیہ ظفر بخاری)

ڈپٹی سپرنٹنڈنٹ آف پولیس
ایڈمن، پولیس ٹریننگ سکول مانسہرہ
11-08-2020

FSC
18/8/20

11/08/20

35

3

From: The Deputy Superintendent of Police,
Police Training School,
Mansehra.

To, The Medical Superintendent,
Category "C" Hospital,
Topi District Swabi.

No. 19 /dated Mansehra the 4-8- 2020.

Subject: VERIFICATION OF OPD CHIT.

Memo:

It is submitted that the enclosed OPD chit vide Serial No. 642-26, dated 30.06.2020 of this office may be verified, the chit is genuine or otherwise please.

[Signature]
Deputy Superintendent of Police,
Police Training School,
Mansehra.

The above stated OPD chit serial no 642 / ⁰³ ~~26~~ ^{Janil} on register is on the name of Mumtaz bibi as per record. Therefore the bogus entry made on Sr.# 642-26 on patient Israr is bogus.

[Signature]
Dr. Arif

[Signature]
Dr. Farooq
CMO

سرکار اورنگ آباد

36

22-6-2020

FRODO MUSTAJAB

FAX NO. : 272959

13 Jul, 2020 12:59PM PT

Test Report

CATEGORY "C" HOSPITAL TOPI DISTT. SWABI
OPD Chit Rs. 10/-

Name Israr Sex M
Age 40 Date 30-06-2020
Disease Fever, cough,
Monthly OPD Serial No. 642-26

CIR

Clinical Findings/Investigation/Treatment/Referral/ Test Findings

Rx
Fever +
Cough +
Headache +
Vomiting
Loss of
appetite.

inj. Decadron 1/4 stat
inj. Provan
inj. Oxidil 1 gm (ATD) 1/4
inj. Pivete
inj. Gharivite
inj. Pladex 1 com
1/4 Canula
inj. Methylpred 1/4 stat

Adm
Fever +
Cough

Advised
Home Isolation
for 14 days

(U. + -)

13/07/2020

CATEGORY "C" HOSPITAL TOPI DISTT. SWAB
OPD Chit Rs. 10/-

Name _____ Sex _____

Age _____ Date _____

Disease _____

Monthly OPD Serial No. _____

Went for work, started head, slight
Horn's isolation, use disposable
cup and plate. Use tissue in
or parcel.

C/R

Clinical Findings/Investigation/Treatment/Referred/ Test Findings

Cup. Maculosa 25mm

Tabs. Parvovirus

Cup. Adenovirus 25mm

2 + 2 + 2

20/10/2010

(7) (38)

From: The Deputy Superintendent of Police,
Police Training School,
Mansehra.

To, The Medical Superintendent,
Category "C" Hospital,
Topi District Swabi.

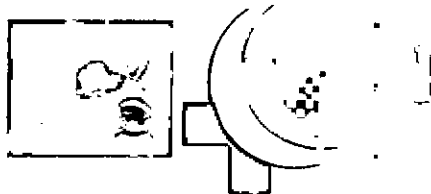
No. 19 /dated Mansehra the 4-8- 2020.

Subject: VERIFICATION OF OPD CHIT.

Memo:

It is submitted that the enclosed OPD chit vide Serial No. 642-26, dated 30.06.2020 of this office may be verified, the chit is genuine or otherwise please.

Amir
Deputy Superintendent of Police,
Police Training School,
Mansehra.



(2) (39)

CATEGORY "C" HOSPITAL TOPI DISTT. SWABI OPD Chit

Rs. 107-

Name Israr Sex M
Age 40 Date 30-06-2020
Disease Fever, cough,
Monthly OPD Serial No. 642-26

Patient's Name : ISR

Lab # : 36

Ref. By: RESPEC

C/R

Clinical Findings/Investigation/Treatment/Referred/ Test Findings

Serology

Test Name

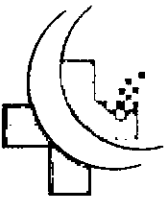
C Reactive Protein (CRP)

Rx
Fever
Cough
Sore throat
Headache
Malaise
Anorexia
Weight loss
Night sweats
Chest pain
Shortness of breath
Fatigue
Joint pain
Rash
Swollen lymph nodes
Enlarged spleen
Hypertension
Diabetes
Asthma
Heart disease
Kidney disease
Liver disease
Autoimmune disease
Infectious disease
Cancer
HIV/AIDS
Tuberculosis
Malaria
Dengue
Cholera
Typhoid
Hepatitis
Ebola
Zika
Measles
Scarlet fever
Diphtheria
Tetanus
Pertussis
Whooping cough
Polio
Hemophilia
Sickle cell anemia
Cystic fibrosis
Phenylketonuria
Tay-Sachs disease
Muscular dystrophy
Huntington's disease
Alzheimer's disease
Parkinson's disease
Epilepsy
Schizophrenia
Bipolar disorder
Major depressive disorder
Anxiety disorder
Substance use disorder
Personality disorder
Eating disorder
Self-harm
Suicidal thoughts
Suicide attempt
Mental health crisis
Hospitalization
Inpatient care
Outpatient care
Counseling
Medication management
Psychotherapy
Behavioral therapy
Group therapy
Family therapy
Individual therapy
Crisis intervention
Emergency services
Inpatient psychiatric hospital
Outpatient psychiatric clinic
Community mental health center
Substance abuse treatment center
Rehabilitation center
Nursing home
Assisted living facility
Respite care
Home care
Telehealth
Digital health
Wearable devices
Mobile health
Health informatics
Health equity
Health justice
Healthcare access
Healthcare quality
Healthcare safety
Healthcare equity
Healthcare justice
Healthcare access
Healthcare quality
Healthcare safety
Healthcare equity
Healthcare justice

Handwritten clinical notes and findings, including symptoms like fever, cough, and sore throat, and a list of various medical conditions.

Signature





(40)

REHBER DIAGNOSTIC CENTER

& LAB SERVICE

(9)

Patient's Name : ISRAR

Age : 40 Years **Sex :** Male

Lab # : 36

Reporting Date : 14-07-20

Ref. By : RESPECTED DR

Receiving Date : 14-07-20

Serology

<u>Test Name</u>	<u>Result</u>	<u>Unit</u>	<u>Reference Range</u>
C Reactive Protein (CRP)	1.02	mg/l	< 6.0

Handwritten signature/initials

Signature

This report is solely based on the sample received & needs clinical correlation. The Referring physician may contact reporting technologist for detailed discussion. Not valid for court

Main Lab: Bashir Market, Main Bazar Topi

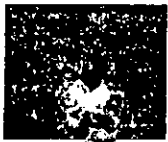
Mob: 0333-9436684 / 0300-0572702

E-mail: kashifhabib43@gmail.com

if any query contact lab for single repeat test within 24 hrs

QUALITY WITHOUT LIMITS





10

Patient's Name : ISRAR

Age : 40 Years **Sex :** Male

Lab # : 36

Reporting Date : 14-07-20

Ref. By: RESPECTED DR

Receiving Date : 14-07-20

Serology

<u>Test Name</u>	<u>Result</u>	<u>Unit</u>	<u>Reference Range</u>
C Reactive Protein (CRP)	1.02	mg/l	< 6.0

Signature

This report is solely based on the sample received & needs clinical correlation. The Referring physician may contact reporting technologist for detailed discussion. Not valid for court
 Address: **Bashir Market, Main Bazar Topi** Phone: **0333-9436684 / 0300-0572702**
 Email: **kashifhabib43@gmail.com** if any query contact lab for single repeat test within 24 hrs



اسرار اور نقار

(42)

22-6-2020 = شنبه 22

FROI MUSTAJAB

FAX NO. : 272959

13 Jul. 2020 12:59PM P1

(11)

Test report

CATEGORY "C" HOSPITAL TOPI DISTT. SWABI

OPD Chit

Rs. 10/-

Name Israr Sex M
 Age 40 Date 30-06-2020
 Disease Fever, cough,
 Monthly OPD Serial No. 642 - 26

C/R	Clinical Findings/Investigation/Treatment/Referred/ Test Findings
<p>Rx Fever + Cough + Sore + vomiting loss of appetite</p>	<p>inj. Decadron 1/4 stat- inj. Provas inj. Oxidil 1 gm (ATD) 1/4 inj. ribes inj. Gharisite inj. Pladex 1 com 1/4 Cannula inj. Methylcoral 1/4 stat</p>
<p>Adv + soft chest</p>	<p>Advise Home Isolation for 14 days</p>

Admin

Dr

(P.T.O)

13/07/2020

43

CATEGORY "C" HOSPITAL TOPI DISTT. SWAB
OPD Chit Rs. 10/-

Name _____ Sex _____
 Age _____ Date _____
 Disease _____
 Monthly OPD Serial No. _____

*Went for mnt, avoid hand shaking
 Home isolation, use chlorine
 cup and plate. Use tissue instead
 of towel.*

O/R

Clinical Findings/Investigation/Treatment/Referred/ Test Findings

*Cap. Moxidone 350mg
 Nil
 Tab. Paracetamol
 1 + 1
 Cap. Nexum 20mg
 1 + 1
 Zym. Debra.
 2 + 2 + 2*

20/06/2020

Adman

Case

(44)

(13)



46

**ABSENCE AND PUNISHMENT RECORD OF
ISRAR HUSSAIN NO. 02 BUGLER (BPS-07) PTS MANSEHRA
DATE OF ENLISTMENT = 28.01.2012**

S. NO.	ALLEGATION/ABSENCE	PUNISHMENT AWARDED
1	22.07.12 to 23.07.12 (01 day)	01 day Quarter Guard vide OB No. 37, dt: 24.7.12
2	Quarrel with Shah Muhammad Driver	Warned to be careful in future Vide OB No. 45, dated 24.9.2012
3	23.08.13 to 26.08.13 (3 days)	03 days without pay Vide OB No. 45, dated 26.08.2013
4	Lake of interest in duty on 20.08.13	01 day Extra Drill Vide OB NO. 52 ,dt: 18.09.2013
5	Absence from duty	10 days without pay Vide OB No. 43, dated 16.08.2013
6	4.10.13 to 21.11.13 (48 days) 24.11.13 to 15.12.13 (21 days) Total = 69 days	69 days without pay One year increment stopped without cumulative effect Vide OB No. 71 dated 24.12.13
7	27.5.14 to 29.5.14 (2 days)	02 days without pay Vide OB No. 42 ,dated 05.06.14
8	8.11.14 to 10.11.14 (2 days)	02 days without pay Vide OB No. 75 ,dated 20.11.14
9	4.12.14 to 7.12.14 (3 days)	03 days without pay Vide OB No. 80 ,dated 20.12.14
10	4.6.15 to 22.6.15 (18 days) 25.6.15 to 2.7.15 (8 days) Total=26 days Absence 16 days Total = 41 days	41 days without pay Warning Vide OB No. 32, dated 7.7.15
11	1.4.16 to 11.5.16 (41 days)	10 days without pay Vide OB No. 91, dated 09.06.16
12	5.11.17 to 23.4.18 (5 month, 18 days)	05 month, 18 days without pay 03 years increment stopped without cumulative effect OB No. 50, dated 17.05.18
13	10.05.18 to 14.05.18 (4 days) 19.06.18 to 26.06.18 (7 days) Total = 11 days	11 days without pay OB No. 66, dated 03.07.18
14	03.07.18 to till dismissed on 14.03.19 (8 month, 11 days)	Dismissed from service Vide OB No. 18 ,dated 14.03.2019
15	Reinstated in service on 29.07.19 vide OB No. 58, dated 29.08.19	04 month, 15 days dismissal period Treated as without pay
16	22.06.20 to date 15.07.20 (24 days) and still absent	24 days
	TOTAL ABSENCE	752 DAYS WITHOUT PAY


SRC 15-7-2021
PTS Mansehra

LPTS

پولیس ڈیپارٹمنٹ

شمارہ

شانہ ارسال

رپورٹ بر خلاف

24 رپورٹ 10 فری صا 020-07-01 وقت 18:40 بجے

تفصیلی مضمون ریسروٹ کنسٹبل اسرار علیگ خیر صاحبہ کو الزامہ 18 روزہ نامہ

6/020 سے 22/020 سے عارف زار بیگم صاحبہ سڈس 96/020 کو تھمناں

گڈ تھمناں کو شریہ بخارفا اور گوانٹیا میں تھمناں ڈاکٹر صاحبہ نے

جسکا رپ رکن کے بعد تھمناں کو رپ کو کرنا کی شکایت ہو جس پر

ڈاکٹر صاحبہ نے ادویات کے ساتھ ساتھ ممکن ہو کر سڈس دیا جسکا بعد

صحت باگ ہوئے کے بعد دوبارہ کرنا سڈس جو کہ رکن کے فضل پہل

صاف ہو رہی ہے اور تھمناں کو رپ اور سڈس میں سڈس بہرے

FAA دفتر میں باغ کو بھیجا تھا سڈس کے ساتھ ساتھ جو حقیقت ہے

ان کو لیا گیا وہ ڈاکٹر صاحبہ کے ساتھ ساتھ رکن روز نامہ

تھمناں کے 40 فیصد میں ارسال ہوگا

جاب عالیہ
نقل بیان کی ہے
LPTS, MA
24/7/2020

Sis
Forwarded
24/07/2020

LPTS

پولیس ڈیپارٹمنٹ

ضلع

ٹاؤن ہائوس

ریپورٹ بر خلاف

18۔ ریپورٹ عنبر خانہ صا۔ مورخہ 22-66-620 وقت 14:15 بجے

تفصیل مضمون
 جس وقت بعد از صبح 13 بجے گنتی میں موجود تھا وہاں عنبر خانہ گارڈ رومز میں
 کچھ عورتیں کھڑی تھیں اور وہاں سے زلزلے کے بعد اسرار نے گنتی میں موجود
 ہونے کے بعد عنبر خانہ گارڈ رومز میں موجود رہنے کے بعد

ضرت سے ارسال ہو گا۔

Blank lined area for additional notes or signatures.

جناب عالی۔
 نقی بھٹانی اس۔
 LPTS MA
 24/7/20
 MASO

Six
 Keraladeo
 ce/p/s/MA
 24/07/20

جناب عالی

تعداد کتب ہے۔ یہ سائل کو تشویش بخارا اور کما تفسیر میں کہی۔

میں پھر کیا کرے اگر صاحب نے داخل کروایا۔ اور پرویز والی

کی کتب قیمت جاری کر دے پھر سائل کو بتوڑ گئی ہے۔

بمباری کیوں کہ بروقت نہیں لکھیا سائل نے فیس پر مشورہ کیا ہے

کیس سائل کا بیان ہے جو حقیقت پر عبور ہے۔

کھانا

اسرار حسین fc & P.T. ماسٹر

(50)

**Office of the Director, Police Training School, Manshra**No. 598 /dated Manshra the 14-07 2020.

To: The Manager,
National Bank of Pakistan,
Topi Branch, Swabi.

Subject: **STOPPAGE OF PAY OF ACCOUNT NUMBER 3333-8 IN
RESPECT OF CONSTABLE ISRAR HUSSAIN.**

In this regard above mentioned Bugler Constable absented himself from lawful duty without any permission/ Information from 22.06.2020 to till now.

It is requested that his pay may please be stopped till further order.



DIRECTOR
Police Training School
Manshra

Police Training School
Manshra

ORDER

Following staff appear before the undersigned in orderly room on 13.07.2020 in connection with their absence. They are personally heard and awarded punishments as mentioned against each their names with immediate effect:-

S. NO.	NAME & RANK	ALLEGATION ABSENCE	PUNISHMENT AWARDED
1	HC/DI Ijaz Ahmad	01 day	Warning
2	FC Sajjad Shah	01 day	Warning
3	HC/DI Khawar	1 hour	Warning
4	HC/DI Fiaz Gul	3 hrs: 25 minutes	Warning
5	LHC Alamzeb	1 day	Warning
6	FC Wajid Yaseen	1 day	Warning
7	FC Rashid	4 days	Warning
8	Sajid C-IV	1 day	Warning
9	Siraj C-IV	1 day	Warning
10	FC Israr Buglar	22.06.20 todote still absent	Pay stop


 DIRECTOR,
 Police Training School,
 Mansehra.

OB No. 30

Dated 13/07/2020

جناب عالی!

خود بیانہ گزارش ہیکہ سائل کی تنخواہ بوجہ
مخیر حاضری بند ہے۔

سائل کرونا کی فرض میں مبتلا تھا عید الفیل
سائل کے پاس موجود ہے۔

بذریعہ درخواست استدعا ہیکہ سائل کی تنخواہ
آزاد کرنے کا حکم صادر فرمایا جائے۔

عین لوازش ہوگی
المرقوم 20/29

الحارض

اسرار حسین FC, PTS مال تہ پرہ

جناب عالی

انکوائری بسسٹم مخیر حاضری
زیر مجموعہ ہے۔ مذکورہ تنخواہ
آزادی کی استدعا کرتا ہے۔
مناسب حکم صادر فرمایا جائے۔

29/07/2020

DSP | Admin | PTSM

29/07/2020

Sir
Forwarded

Ri | PIS | MA
29/07/2020

14

22

عم عامی

31 جون 2020ء تا 31-5-2020ء تک 18:40 بجے

تعمیراتی امور کے متعلق شام ہواز خان ڈی آف ڈسٹرکٹ پولیس آفیسر کی طرف سے

ڈی آف ہواز خان کی طرف سے مورچہ کار ہواز خان کی طرف سے اہم اہم کیسوں
پر دستاویزی اسٹیٹس کی رپورٹیں اور اس کے ساتھ ساتھ پولیس آفیسر کی طرف سے
کیسوں کی ترقی اور ان کی ترقی کے بارے میں جاننے کے لیے کیسوں کی فہرست
میں درج نام کی ہے۔

ظاہری

بدر بخش

11/06/2020

File. DML

DIRECTOR
Police Training School
Muzaffargarh
16/06/2020

11/6/2020

RI/4

حاضری

23

منع

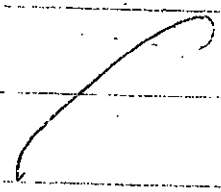
نائب الامام

پورہ نظام

20:30 تا 14:20

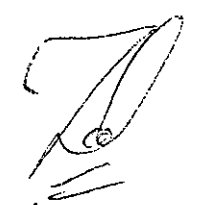
20:30 تا 14:20

اس وقت اسرارِ رازش سرفراز خان شاہ صاحب (فرزند صاحب) 31
 سے حاضری کر رہے ہیں۔ صوبہ کی ساری تمام فرمائشوں کو فرزند صاحب کی نگرانی
 میں علاج و معالجہ کے لیے درج ذیل ہسپتال میں۔ اور صوبہ دار کے سامنے
 بار بار سے اطلاع فرمائی ہے۔ لیکن اس وقت سے یہ حال نہیں
 دیکھا ہے۔ اب خان صاحب کو اطلاع دینا ہے اور حسبِ قدر
 کی حاضری فرمائی جائے۔ یہ نقل فرمائی جائے اور اس کے فرزند

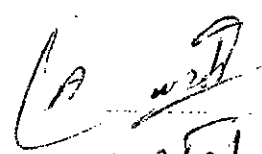


حاضری

Sir,
Forwarded



LO/PTS/MA



MA/PTS/MA
14/6 2020

Sir Forwarded



سپارٹس
فیم فائبر کپ

241

شعب

مقام
ٹائٹل

ریپورٹ بر خلاف

29 ریپورٹ بر خلاف
والین عنقاوی
تعمیرات
ADo
4 3/20 وقت
1:45

تعمیرات مشورون ریپورٹ بر خلاف
ADo کے ذریعے کیا گیا ہے فیم فائبر کپ

موجودہ بارے میں کارڈ میں اس کے ساتھ ساتھ
ہر اسرار Fe کی ڈیوٹی ہے اس کے ساتھ ساتھ
میرے عدم موجودگی میں اس کے ذریعے اس کے ساتھ ساتھ
کی حالت میں ہے اس کے ساتھ ساتھ اس کے ساتھ ساتھ
اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ

Sir,
Forwarded. 11.

CO/PFS/MA

Sir
Forwarded

RI/PFS
8/3/20

جناب عالی
نقل و طابق اصل ہے
MA
MA

Sir,
Forwarded,

ADMIN OFFICER
Police Training School
Hansera
11-03-2020

215

حافری . آف

منبع

شماره

ریپورٹ برائے

28 رپورٹ حافری 10 مورخہ 5 3/20 وقت 18:40 ع

تعمیل مشین اس وقت اسرار سے حافری شدہ کورام و دیگر 29 روزنامہ

4 3/20 سے حافری آ کر بیانی یکم سال کا ایک دن ٹیمین

لیو ہوا تھا۔ اب حافری کیا گیا ہے۔ حافری کی رپورٹ دیکھ کر
میں سمجھ گیا کہ حافری درج روزنامہ کی گئی ہے۔

ایم ڈی حافری

Next time there will be no leave

DIRECTOR
Police Training School
Muzaffargarh

Sir,
Forwarded
LO/DB/MA

جناب عالی :-
تقریباً 10 دن قبل ہے

[Handwritten signature]

Sir
Forwarded

RIPTS
8/3/20

Sir, forwarded,

ADMIN OFFICER
Police Training School
Muzaffargarh
11-03-2020

شماره 26

16 تاریخ 3/2/20 وقت 4:00

اسوقت اشفاق نام عنبر خان 30 روپے

اعزازتہ 2/2/2000 سے ملنے اور یہاں سے بھی شہزادہ کے گھرانے
والیوں سے ملے ہوئے ہیں اور ان کے پاس 30 روپے ہیں اور ان کے پاس
جو کچھ بھی ہے اس وقت دیکھ کر اس کے لئے اس کے پاس سے لے کر آئے ہیں

18 تاریخ 3/2/2000 وقت 17:10 اس وقت اس کے پاس سے
عنبر خان کے پاس سے ملے اور ان کے پاس سے 2/2/2000 سے ملے ہوئے ہیں
اس کے پاس سے بھی ملے ہوئے ہیں اور ان کے پاس سے لے کر آئے ہیں
اس کے پاس سے بھی لے کر آئے ہیں اور ان کے پاس سے لے کر آئے ہیں

Warm
DIRECTOR
Police Training School
Karachi

Sig
forwarded
K.S. P.S

Uch

Sir Forwarded
Fanna

Sir Forwarded

RIPIS
4/2/2000

Handwritten notes and signatures at the bottom right.

جناب عالی

تعداد کتب ہے۔ نے سائل کو شکریہ بخار اور کیا تھا نہیں کہی۔

حسن پھر کیا کہی اگر صاحب نے داخل کروایا۔ اور روزہ والی کتب

کی کتب منت جاری ہر دے پھر سائل کو بتو کہتے ہیں۔

بجاری کتب کے بروقت نہیں لکھتا سائل نے فیس پر سائل نقل کیا تھا

کسی سائل کا بیان ہے جو حقیقت پر نہیں ہے۔

لکھا

اسرار حسین fc p.t. 9 ما



THE DIRECTORATE OF TRAINING,
KHYBER PAKHTUNKHWA, PESHAWAR
Email: dsptgrbastic@gmail.com
No. 9073 / Dated 05 / 11 / 2020 Phone & Fax No. 091-9211268

ORDER

This order shall dispose-off the department appeal/application, preferred by FC/Bugler Constable Israr Husa No.2 of Line Staff PTS, Mansehra against the major punishment of dismissal from service vide OB No.37 dated 15/09/2020 passed by Director, PT Mansehra.

Brief facts of the case are that the appellant/applicant during his absence on 13.07.2020, sent a medical chit through fax and stated in arrival report that he was sick and remained in quarantine for 14 days due to COVID-19 symptoms. Disciplinary proceedings were initiated against the appellant/applicant. DSP Admin, Mrs. Samina Zafar Bukhari was appointed as an Enquiry Officer. During the enquiry, the appellant/applicant was found a habitual absentee of 757 days absence during his service. The Enquiry Officer sent the medical chit to Medical Superintendent Category "C" Hospital Topi for verification vide Office Memo: No.19, dated 04.08.2020. The Medical Officer Category "C" Hospital, Topi remarked that entry made on Sr.No.642-26, dated 30.06.2020 on patient Israr has not been entered in the Hospital Registrar and as such is bogus.

The Enquiry Officer found the appellant/applicant guilty of gross misconduct and as per the findings report proved that the defaulter Constable was not taking interest towards his assigned duties and absented himself from duty for a period of 757 days during his previous service.

The appellant/applicant was previously dismissed from service Vide OB No.18, dated 14.03.2019 and reinstated into service on 29.07.2019 vide OB No.58, dated 29.08.2019.

Recently, the applicant/applicant absented himself from his lawful duties from 22.06.2020 to 21.07.2020 (29 days) and from 04.08.2020 to 10.09.2020 (38 days) with a total absence of 67 days.

The appellant/applicant appeared before the Enquiry Officer and submitted his written statement which was not found satisfactory and the appellant/applicant was found guilty and, hence, was served with Final Show Cause Notice on his home address through District Police Officer, Swabi vide Memo: No.677, dated 13.08.2020.

The appellant/applicant was afforded an opportunity of personal hearing and on 15.09.2020 The appellant/applicant appeared for personal hearing but failed to satisfy the Director, PTS, Mansehra.

In view of the reasons stated above and conclusion of the department proceedings the Director, PTS, Mansehra in exercise of powers vested in him under Police Rules, 1975 (6)(iv) awarded major punishment of dismissal from service with immediate effect vide OB No.37 dated 15.09.2020 and his period of absence of 67 days was treated as Leave Without Pay. The appellant preferred an appeal/application against the said order to the undersigned.

I have gone through the appeal and relevant record as well as the comments received from AIG, Training and I am, therefore, in full agreement with the Order of Director, PTS Mansehra.

Therefore, in view of the above I, **MUHAMMAD IMTIAZ SHAH, PSP/QPM**, Deputy Inspector General of Police, Directorate of Training, Central Police Offices, Peshawar, appellate authority, dismiss the appeal of Ex-FC/Bugler Constable Israr Hussain No.2 of Line Staff PTS, Mansehra and maintain the order of dismissal passed by Director, PTS, Mansehra dated 15.09.2020.

ORDER ANNOUNCED

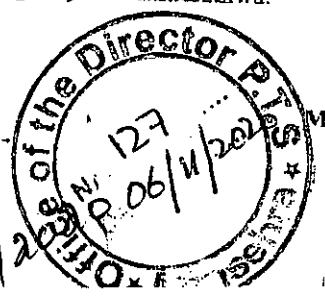
MUHAMMAD IMTIAZ SHAH, PSP/QPM,
Deputy Inspector General of Police,
Directorate of Training,
Central Police Offices, Peshawar

No. 9074-77 / Trg: dated: 25 / 09 / 2020.

- Copy of above is forwarded for information and necessary action to the:-
1. Assistant Inspector General of Police, Training Khyber Pakhtunkhwa.
 2. Director PTS Mansehra.
 3. Dy: Superintendent of Police, Training Khyber Pakhtunkhwa.
 4. P.A to DIG/Training, Training Khyber Pakhtunkhwa.

SRC/PA
Please copy
and file

Shah 11/11/20



MUHAMMAD IMTIAZ SHAH, PSP/QPM,
Deputy Inspector General of Police,
Directorate of Training,
Central Police Offices, Peshawar

60

31



Office of the Director, Police Training School, Mansehra

No. 714 /dated Mansehra the 01.09. 2020.

To: The District Police Officer,
Swabi.

Subject: **FINAL SHOW CAUSE NOTICE.**

Memo: Kindly refer to this office Memo: No. 677, dated 13.08.2020 and favour this office with present position of the case please.

DIRECTOR,
Police Training School,
g/c ✓ Mansehra

61

35



Office of the Director, Police Training School, Mansehra

No. 677 /dated Mansehra the 13.08-2020.

To: The District Police Officer,
Swabi.

Subject: **FINAL SHOW CAUSE NOTICE.**

Memo:

It is submitted that Final Show Cause Notice of Bugler Constable Israr Hussain No. 02 s/o Rahdat Hussain of this training school is sent herewith for distribution upon him. He is residence of Mohalla Matona Topi Swabi.

It is therefore, requested that final show cause notice may kindly be delivered to the above mentioned official though local Police of PS Topi Swabi.

DIRECTOR,
Police Training School,
Mansehra

13/08/2020

FINAL SHOW CAUSE NOTICE

I, Iftikhar Ahmad, PSP, Director, PTS Mansehra as competent authority hereby charge you FC Israr Hussain No. 02 Bugler PTS Mansehra as Follows:-

You FC Israr Hussain No. 02 Bugler PTS Mansehra, found habitual absentee on different occasions and not taking interest in the discharge of your official duties. Your absence record is tabulated below:-

S. NO.	ALLEGATION/ABSENCE	PUNISHMENT AWARDED
1	22.07.12 to 23.07.12 (01 day)	01 day Quarter Guard vide OB No. 37, dt: 24.7.12
2	Quarrel with Shah Muhammad Driver	Warned to be careful in future Vide OB No. 45, dated 24.9.2012
3	23.08.13 to 26.08.13 (3 days)	03 days without pay Vide OB No. 45, dated 26.08.2013
4	Lake of interest in duty on 20.08.13	01 day Extra Drill Vide OB NO. 52 ,dt: 18.09.2013
5	Absence from duty	10 days without pay Vide OB No. 43, dated 16.08.2013
6	4.10.13 to 21.11.13 (48 days) 24.11.13 to 15.12.13 (21 days) Total = 69 days	69 days without pay One year increment stopped without cumulative effect Vide OB No. 71 dated 24.12.13
7	27.5.14 to 29.5.14 (2 days)	02 days without pay Vide OB No. 42 ,dated 05.06.14
8	8.11.14 to 10.11.14 (2 days)	02 days without pay Vide OB No. 75 ,dated 20.11.14
9	4.12.14 to 7.12.14 (3 days)	03 days without pay Vide OB No. 80 ,dated 20.12.14
10	4.6.15 to 22.6.15 (18 days) 25.6.15 to 2.7.15 (8 days) Total=26 days Absence 16 days, Total = 41 days	41 days without pay Warning Vide OB No. 32, dated 7.7.15
11	1.4.16 to 11.5.16 (41 days)	10 days without pay Vide OB No. 91, dated 09.06.16
12	5.11.17 to 23.4.18 (5 month, 18 days)	05 month, 18 days without pay 03 years increment stopped without cumulative effect OB No. 50, dated 17.05.18
13	10.05.18 to 14.05.18 (4 days) 19.06.18 to 26.06.18 (7 days) Total = 11 days	11 days without pay OB No. 66, dated 03.07.18
14	03.07.18 to till dismissed on 14.03.19 (8 month, 11 days)	Dismissed from service Vide OB No. 18 ,dated 14.03.2019
15	Reinstated in service on 29.07.19 vide OB No. 58, dated 29.08.19	04 month, 15 days dismissal period Treated as without pay
16	22.06.20 to date 21.07.20 (29 days)	29 days
	TOTAL ABSENCE	757 DAYS WITHOUT PAY

(32) (63)

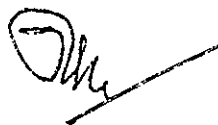
During absence on 13.07.2020 you sent a medical chit through fax and recorded in your arrival report that you are sick and remained in quarantine 14 days for Corona pandemic treatment. Disciplinary proceeding started against you. DSP Admin Samina Zafar Bukhari appointed as Enquiry officer. Enquiry officer found you habitual absentee of 757 days absence and medical chit sent to Medical Superintendent Category "C" Hospital Topi for verification which was found bogus.

The Enquiry officer found you guilty of gross misconduct and in finding report, proved that defaulter Constable is not taking any interest towards his assigned duties and remained absented himself from duty for the period of 757 days during his pervious service.

You remained dismissed from service Vide OB No. 18, dated 14.03.2019 and reinstated on 29.07.19 vide OB.No. 58, dated 29.08.19.

Recently you are also absented himself from your lawful duties from 22.06.2020 to 21.07.2020 (29 days) and from 04.08.20 todate (09 days) and still absent (Total absence= 36 days).

You are hereby again given last chance to appear before the undersigned or submit your reply in written in your defense within 07 days of the receipt of this final show cause notice. In case of failure to submit your written reply, ex parte action will be initiated against you and you will be awarded major punishment as defined in section-6 (1) of the KPK police Rules 1975.


(IFTIKHAR AHMAD) PSP
DIRECTOR,
Police Training School,
Mansehra



ضلع مانسہرہ

ٹرانسپارٹ

پولیس ٹریننگ سکول

4 - رپورٹ غیر حاضری (ظہر و عشاء) کی صورت 04 08/20 وقت 30:11 بجے

تفصیل مضمون اور جوڑے کے حوالے (حکم انحصار) بلا عمل (X) اور (ATC) کے

کی عطا کیے گئے ہیں۔ (تفصیل مضمون) کے خلاف موجود کیا گیا۔ حکم لاگو کرنے سے
کتابیں اس کے لئے (تفصیل مضمون) کے خلاف موجود کیا گیا۔ حکم لاگو کرنے سے
بیتہ تہذیبی۔ جو سہولت ہے اس میں ہیں، بلا لیا جی۔ جسکی رپورٹ غیر حاضری
درج روزانہ کی صورت نقل کر کے انحصاروں کے خلاف (X) کے ذریعے سے ارسال ہوتی

Empy
2020

INSPECTION
Police Training School
Manshra
2020

نقل عطا کیے گئے ہیں
3/8/2020

m. Admin

Sir,
Forwarded
Admin
ADMIN OFFICER
Police Training School
Manshra.

Sir
Forwarded

13/8/2020

12/8/2020
PIS/MA

۲۹

مهر ۱۳ روزنامه ۱۰/۰۹/۵۲۰

مردی را به نام آقای ماسی معرفی ۱۰/۰۹/۵۲۰ وقت ۱۰/۰۹/۵۲۰ روزنامه ۱۰/۰۹/۵۲۰
 کانتینر در اسرار صیقل ۵۲۰ غیر حاضر مشرف بحرامه و روزنامه ۱۰/۰۹/۵۲۰
 علم از او بیگانه می باشد و با کانتینر در اسرار صیقل ۵۲۰
 غیر حاضر می باشد ۱۰/۰۹/۵۲۰ و الله اعلم بالصواب و حسب مقتضای
 روزنامه ۱۰/۰۹/۵۲۰ نقل به استناد ۱۰/۰۹/۵۲۰ روزنامه ۱۰/۰۹/۵۲۰

صفا بنعلی

نقل به استناد

صفا بنعلی

۱۰/۰۹/۵۲۰

ORDER

This order will dispose of departmental enquiry against Bugler Constable Namey Ismail No. 62 of PTS Mansehra. The allegation against him that, he deliberately absented himself from official duty as per following detail:-

S. NO.	ALLEGATION/ABSENCE	PUNISHMENT AWARDED
1	22.07.12 to 23.07.12 (01 day)	01 day Quarter Guard vide OB No. 37, dt: 24.7.12
2	Quarrel with Shah Muhammad Driver	Warned to be careful in future Vide OB No. 45, dated 24.9.2012
3	23.08.13 to 26.08.13 (3 days)	03 days without pay Vide OB No. 45, dated 26.08.2013
4	Lake of interest in duty on 20.08.13	01 day Extra Drill Vide OB NO. 52 ,dt: 18.09.2013
5	Absence from duty	10 days without pay Vide OB No. 43, dated 16.08.2013
6	4.10.13 to 21.11.13 (48 days) 24.11.13 to 15.12.13 (21 days) Total = 69 days	69 days without pay One year increment stopped without cumulative effect Vide OB No. 71 dated 24.12.13
7	27.5.14 to 29.5.14 (2 days)	02 days without pay Vide OB No. 42 ,dated 05.06.14
8	8.11.14 to 10.11.14 (2 days)	02 days without pay Vide OB No. 75 ,dated 20.11.14
9	4.12.14 to 7.12.14 (3 days)	03 days without pay Vide OB No. 80 ,dated 20.12.14
10	4.6.15 to 22.6.15 (18 days) 25.6.15 to 2.7.15 (8 days) Total=26 days Absence 16 days, Total = 41 days	41 days without pay Warning Vide OB No. 32, dated 7.7.15
11	1.4.16 to 11.5.16 (41 days)	10 days without pay Vide OB No. 91, dated 09.06.16
12	5.11.17 to 23.4.18 (5 month, 18 days)	05 month, 18 days without pay 03 years increment stopped without cumulative effect OB No. 50, dated 17.05.18
13	10.05.18 to 14.05.18 (4 days) 19.06.18 to 26.06.18 (7 days) Total = 11 days	11 days without pay OB No. 66, dated 03.07.18
14	03.07.18 to till dismissed on 14.03.19 (8 month, 11 days)	Dismissed from service Vide OB No. 18 ,dated 14.03.2019
15	Reinstated in service on 29.07.19 vide OB No. 58, dated 29.08.19	04 month, 15 days dismissed Treated as without pay
16	22.06.20 to date 21.07.20 (29 days)	29 days
	TOTAL ABSENCE	757 DAYS WITHOUT PAY

(67)

During absence on 13.07.2020, you sent a medical chit through fax and recorded in your arrival report that you are sick and remained in quarantine 14 days for Corona pandemic treatment. Disciplinary proceeding started against you. DSP Admin Samina Zafar Bukhari appointed as Enquiry officer. Enquiry officer found you habitual absentee of 757 days absence in your service. Enquiry officer sent the medical chit to Medical Superintendent Category "C" Hospital Topi for verification vide this office Memo: No. 19, dated 04.08.2020. The Medical Officer Category "C" Hospital Topi remarks that "Bogus entry made on Sr. # 642-26, dated 30.06.2020 on patient Israr is bogus attached with enquiry files.

The Enquiry officer found you guilty of gross misconduct and in finding report, proved that defaulter Constable is not taking any interest towards his assigned duties and remained absented himself from duty for the period of 757 days during his pervious service.

You remained dismissed from service Vide OB No. 18, dated 14.03.2019 and re-instated on 29.07.19 vide OB No. 58, dated 29.08.19.

Recently you are also absented himself from your lawful duties from 22.06.2020 to 21.07.2020 (29 days) and from 04.08.2020 to 10.09.2020 (38 days) (Total absence =67 days).

Delinquent Bugler Constable appear before the Enquiry Officer and given his written statement which is not satisfactory due to which he found guilty. The defaulter Bugler Constable Israr Hussain No. 02 was served with Final Show Cause Notice on his home address through District Police Officer Swabi vide this office Memo: No. 677, dated 13.08.2020.

The defaulter Constable Bugler Israr Hussain No. 2, appear before the undersigned in Orderly Room on 15.09.2020, during personal hearing/cross questions in connection with his long deliberate absence and submission of Bogus Medical Chit. He failed to satisfied the undersigned.

Due to above mentioned reasons departmental proceeding have taken against him in exercise of the power vested in me under Police Rule 1975 (6) (iv). He is hereby awarded punishment of dismissal from service with immediate effect. Period of absence 67 days treated as leave without pay.

Order Announced.

DIRECTOR
Police Training School,
Mansehra

OB No. 07

Dated 15-9-2020

1. Copy submitted to the Deputy Inspector General of Police, Training, Khyber Pakhtunkhwa, Peshawar for favour of information:-
2. PO/ SRC PTS Mansehra for further necessary action.
3. RI PTS Mansehra for necessary action.

No 203-6
Dt 15-9-2020

DIRECTOR
Police Training School