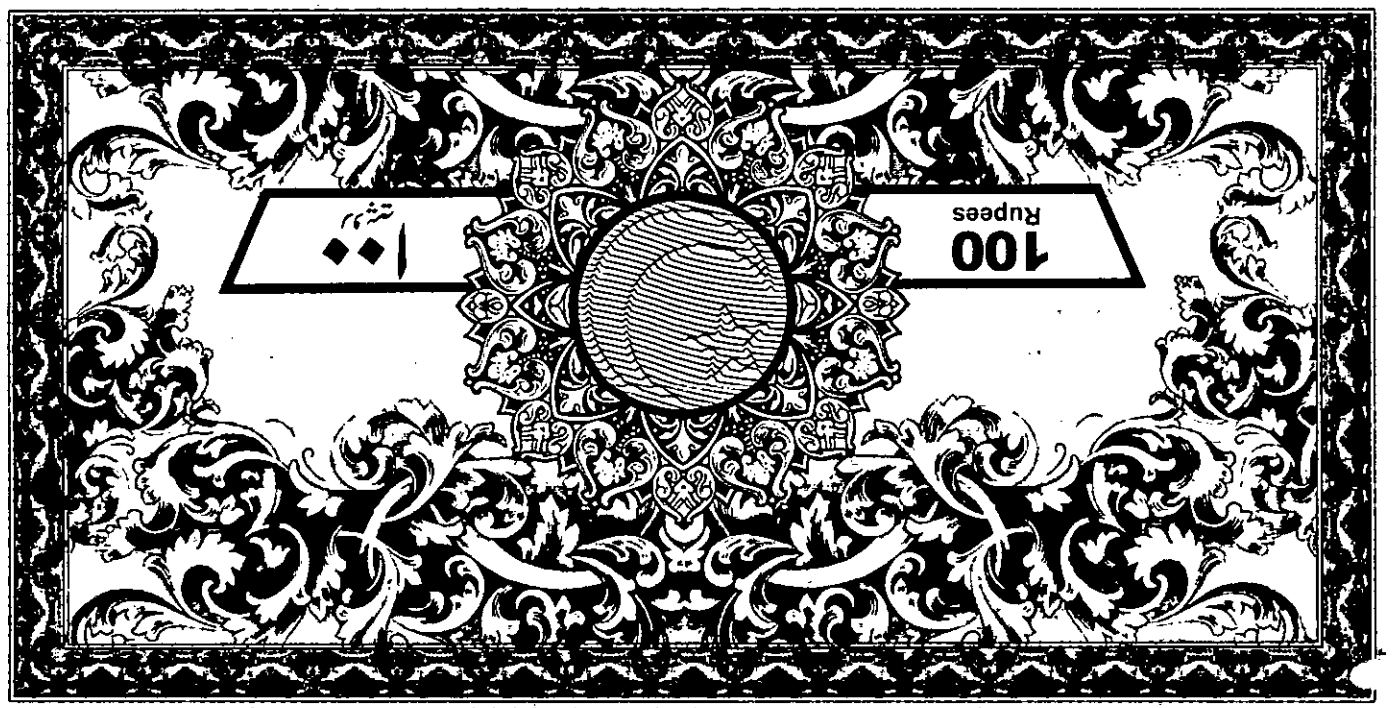


Dated 27th 2023

Naveed Ahmad

Y Naveed Ahmad S/o Muhammad Ali
 Iqbal Respondent in case Title
 Naveed Ahmad vs Chief Conservator
 Wildlife Khyber Pakhtunkhwa and others.
 do hereby solemnly and declare on
 oath that De novo inquiry report and
 acted as per directions of Kf Service
 Tribunal Peshawar in appeal No. 6928/2021
 on 11.11.2022. That in this regard we
 have nothing concealed from the
 honorable court therein. Whatever
 stated above is true and
 correct to the best of our knowledge
 and belief.

Affidavit



V162926

Handwritten scribble or signature at the top of the page.



Disponible en ligne - 27-01-2023

OFFICE ORDER NO. 48 DATED 16/07/2023
ISSUED BY MUHAMMAD NIAZ DIRECTOR/ CONSERVATOR WILDLIFE
PESHAWAR ZOO, PESHAWAR

Whereas Mr. Majid Khattak Ex-Mali remained willfully absent from duty for long periods and disobeyed orders to the level that it created problems for the zoo administration due to which inquiry proceeding were conducted against him.

Whereas charge sheet dated 02/11/2020 was served upon him and findings of inquiry were compiled and the Competent Authority imposed major penalties of removal from service upon vide office order No 58 dated 13/04/2021.

Whereas feeling aggrieved, the said Mr. Majid Khattak Ex-Mali proceeded to the Khyber Pakhtunkhwa Service Tribunal for seeking remedy against the ibid office order and the Honorable Service Tribunal directed the Department to conduct "De-novo" inquiry in the matter.

Whereas "De-novo" inquiry was conducted and inquiry report dated 30/12/2022 received in this office.

Whereas Show Cause notice was served on the aforementioned accused/ex-Mali and was heard in person.

Whereas after perusal of "De-novo" inquiry report, relevant record, response to the Show Cause Notice and his arguments in personal hearing, I, Muhammad Niaz Director/Conservator Wildlife Peshawar Zoo empowered under the rules 7(f) of Efficiency and Disciplinary Rules 2011 hereby impose the major penalty of "Removal from Service" upon Mr. Majid Khattak, Ex-Mali Peshawar Zoo under Rule 4 (b)(iii) of the rules ibid from the date he has been awarded penalty.

Sd/-
(Muhammad Niaz)
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

No. 1849-54 /P-Zoo,

Copy forwarded for information to the:-

1. Chief Conservator Wildlife Khyber Pakhtunkhwa Peshawar.
- ~~2.~~ Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar Judgment of Appeal No:6728/2021P.
3. Deputy Director Peshawar Zoo.
4. Administrative Officer Peshawar Zoo.
- ~~5.~~ Accountant Peshawar Zoo.
6. Mr. Majid Khattak, Ex-Mali.

[Signature]
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

BACKGROUND

An inquiry committee was constituted by the then Director/Conservator Wildlife, Peshawar Zoo wherein Mr. Ishtiaq Ullah, the then Deputy Director, Peshawar Zoo was appointed as inquiry Officer to conduct inquiry against Mr. Majid Khattak, Ex- Mali, Peshawar Zoo passing through probation period on account of the following charges levelled against him vide his office order No. 41 dated: 13.05.2020 (**Annex-I**).

- (a). Inefficient or has ceased to be efficient.
- (b). Guilty of misconduct.
- (c). Guilty of habitually absenting himself from duty without prior approval of leave.

Meanwhile, the probation period of the accused was extended for another period of one year and the accused was also censured vide Director/Conservator Wildlife Peshawar Zoo office order No.13 dated 25/08/2020 (**Annex-II**).

It is worth consideration that charge sheet was served upon Mr. Majid Khattak, Ex- Mali by the then Director/Conservator Wildlife, Peshawar Zoo vide his office letter No. 1043/Zoo dated: 02.11.2020 (**Annex-III**).

Subsequently, Mr. Majid Khattak, Ex- Mali, Peshawar Zoo was removed from service by Director/Conservator, Peshawar Zoo under the allegations of willful absence and weak performance under rule-04 (iii) of Khyber Pakhtunkhwa Government, Efficiency and Discipline Rules-2011 and Section 11 (1)(i) vide his office order No. 58 dated 13/04/2021 (**Annex-IV**).

After imposition of Major Penalty, the accused (Mr. Majid Khattak Ex- Mali) preferred appeals for his reinstatement one to Secretary FE&WD Khyber Pakhtunkhwa received to the office of Chief Conservator Wildlife Khyber Pakhtunkhwa vide Section Officer (ESTT) letter No. SO(Estt)/FE&WD/1-43/2020/KC Dated 28.05.2021. which was endorsed to Director/Conservator, Peshawar Zoo vide ends No. 9068/WL (B-X-08) Dated 31/05/2021 (**Annex -V**) and other to Chief Conservator Wildlife Khyber Pakhtunkhwa dated 01.06.2021 which was forwarded to the Director/Conservator, Peshawar Zoo for comments (**Annex -VI**). Both the appeals were rejected as bared by time because both the appeals preferred after a period of 30 days from the date of his termination whereas, the major penalty of removal from service was upheld vide Chief Conservator Wildlife office order No. 171 dated 17.06.2021 (**Annex-VII**).

Thereafter, Mr. Majid Khattak, Ex-Mali agitated his "his removal from services" in the KP Service Tribunal for his reinstatement in service vide his Appeal No.6728/2021 dated 02/07/2021. The Honorable Tribunal decided the appeal on 01/11/2022 with the directions to conduct De-novo inquiry against the appellant (**Annex- VIII**)

In compliance to the order of the Honorable Service Tribunal Khyber Pakhtunkhwa, the undersigned was appointed as Inquiry Officer to conduct De-Novo inquiry vide Director/Conservator, Peshawar Zoo Office Order No. 36 dated 06.12.2022 (**Annex-IX**). Accordingly, the same charge sheet along with memo of allegation was served upon Majid Khattak Ex- Mali; signed afresh vide Office letter No. (**Annex-X**)

PROCEEDINGS:

As an inquiry officer the undersigned is barred by Law to conduct the inquiry because the accused is out of service and does not fall within the definition of civil servant since 13.04.2021, as civil services law are applicable only to civil servant in service. However, upholding the order of Honorable court Service Tribunal Khyber Pakhtunkhwa, the undersigned adopted the following course of action.

As inquiry officer, the undersigned perused the relevant record of the case in office of the Director/Conservator, Peshawar Zoo vide letter No. 5160/WL (AIP) dated 16.12.2022 and obtained written reply, to the charge sheet served upon Mr. Majid Khattak (**Annex-XI**) and also conducted personal hearing of the accused on 27.12.2022 at 10:00 am

Director/Conservator, Peshawar Zoo was also requested to depute a well conversant officer of his office to attend the office of the undersigned with relevant record on the same date and time to assist the undersigned vide letter No. 5173/WL dated: 26/12/2022 (Annex-XII). And accordingly, Mr. Ejaz- ul- Haq Education Officer, Peshawar Zoo performed duty.

After scrutinizing relevant record of the case, the written reply of the accused and hearing the accused personally on 27.12.2022, brief about each allegation is reproduced as follows;

Allegation No.01:

That, he has tendency to avoid orders and discipline intentionally.

Reply of the accused:

The accused replied; "I have performed my duties according to the orders of the superior authority and have not violated any order of the superior authority, moreover, I remained disciplined & the entire allegations is totally wrong, baseless and without proof".

Discussion:

Reply of the accused is not convincing as it is evident from the record that not only the concerned beat officers i.e. Wildlife watchers have reported in writing multiple times about his tendency of disobeying the orders of higher ups while his ill-discipline and lethargic attitude towards performance of official duties was also reported by his controlling officer as well; for which he was issued explanations and warnings in writing frequently (Annex-XIII).

Allegation No.02:

That he used to remain inactive unless and until directed by higher ups.

Reply of the Accused:

The accused replied "I used to remain active & worked hard as a Mail being poor person, Moreover the allegation is baseless as already stated in the preceding para & the petitioner have never violated the order of high ups & remains obedient".

Discussion:

The reply of the accused does not seem convincing as the record shows that by reason of his weak performance and avoiding the directions of his high ups he was reported for disciplinary actions time and again

Allegation No.03:

That, he avoids performing duty in the sun and always remain in search of comfort zone

Reply (03):

The accused replied "It is humbly submitted as I already stated that I am a poor person & have work hard without preferring comfort zone use to remain under the hot rays of the sun during the duty hours, hence, the allegation may kindly be rejected in favor of petitioner".

Discussion:

Partially proved as discussed earlier in the discussion of Allegation No 1 and 2 above.

Allegation (04):

That, he remains absent on one pretext or other habitually.

Reply (04):

The accused replied "Unfortunately, in year 2021 the accused & then his father fell ill & later on the petitioner father was diagnosed Covid-19 due to which he quarantined himself with his father, & couldn't attend the office & perform his duties in those days."

Discussion:

After going through the relevant record, it was found that the accused was called upon explanations and warnings time and again by his controlling officer for his willful absence from his official duties. This fact is evident from his official attendance record of nine (9) months which indicates that he was habitual of willful absence. (Annex- XIV)

Allegation (05):

That he politically pressurizes higher ups for favor in avoiding his duty schedule.

Reply (05):

The accused replied "It is submitted that I am a poor person & worked in the department as Mali. It is astonishing that how a poor person being Mali could approach political high ups, for pressurizing baseless, wrong & may kindly be rejected in favour of petitioner."

Discussion:

Allegation not proved, as no such evidence found on official record of the concerned office.

Allegation (06):

He prefers to involve in gossips with zoo staff instead of performing duty.

Reply (06):

The accused replied "It is submitted that the entire para is wrong as there is no single statement of any person with whom I have gossips while performing my duties, hence the para may kindly be rejected in favor of petitioner"

Discussion:

Allegation not proved, in prima facie, as no such evidence found on official record of the concerned office although maintenance of record for such instances is not applicable.

Allegation (07):

He has habitual in misbehaving with Wildlife Watchers instead of performing duty.

Reply (07):

The accused replied "It is submitted that I have never misbehaved with Wildlife watchers & I myself perform all tasks given by high ups & there in no single statement of Wildlife watchers that I have misbehaved with them, hence Para may kindly be rejected in favor of petitioner"

Discussion:

The allegation Proved as is evident from the statements of the concerned Wildlife watchers posted by the time in Peshawar Zoo (Annex-XV)

Allegation (08):

He has more interested in his domestic issues and least interested in official duty.

Reply (08):

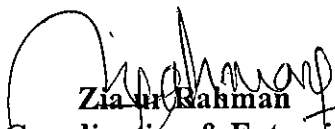
The accused replied "I have performed my duties according to the orders & was never interested in the domestic issues, however being human, I was facing server disease as well as caring my father being quarantine with him during covid-19 for which I have taken proper leaves form high ups accordingly, Moreover the entire allegation in charge sheet is baseless without circumstantial evidence based on presumption & assumptions, hence, the entire allegation may kindly be rejected."

Discussion:

As evident from the allegations No. 1,2 and 3, it is established that the accused is habitually absent from duty which partially prove the charge.

Conclusion;

Charges levelled in allegation No. 1,2,4 and 7 stands proved, allegation No.03 and 8 partially proved and allegation No. 5 and 6 is not proved against the accused and the competent authority may evaluate for further course of action/award of penalties as per provisions of E&D Rules, 2011.


Zia ur Rahman 30/12/2022
Coordination & Extension
Divisional Forest Officer Wildlife
MAI Forestry Sector Project
(Wildlife Component)
Peshawar

(Annex 1)

APPENDIX - 1

71

OFFICE ORDER NO. 41 DATED PESHAWAR THE 13/05/2020 ISSUED BY
MR. IFTIKHAR UZ ZAMAN, DIRECTOR/CONSERVATOR WILDLIFE
PESHAWAR ZOO, PESHAWAR.

As reported by the Admin. Officer, Peshawar Zoo Mr. Majid Khattak. Mali (BPS-03) of Peshawar Zoo remained willful absent from his duty without permission or even submitting any application or getting prior approval of the competent authority. Besides, he is not taking interest his official duties.

Keeping in view, in accordance with Section-09 of the Govt. of Khyber Pakhtunkhwa Efficiency and Disciplinary Rules, 2011, he is suspended from Govt. Services with immediate effect.

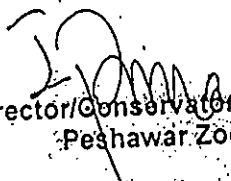
Mr. Ishtiaq Ullah Deputy Director Peshawar Zoo is hereby nominated to conduct an enquiry against Mr. Majid Khattak (BPS-03) and submit the enquiry report within 15 days positively.

(Iftikhar uz Zaman)
Director/Conservator Wildlife
Peshawar Zoo

No. 3810-15 /Zoo,

Copy forwarded for information and necessary action to:

1. The Chief Conservator Wildlife Khyber Pakhtunkhwa, Peshawar.
2. Mr. Ishtiaq Ullah Deputy Director/DFO Wildlife Peshawar Zoo.
3. Admn. Officer/SDWO Peshawar Zoo.
4. Mr. Majid Khattak. He is directed to appear before the enquiry officer within three days.
5. Divl. Accountant/Disburser.
6. Personal file for record.


Director/Conservator Wildlife
Peshawar Zoo

(Ammon-11) OFFICE ORDER NO 13 DATED PESHAWAR THE 25-08-2020,
ISSUED BY MR. IFTIKHAR UZ ZAMAN, DIRECTOR/CONSERVATOR WILDLIFE
PESHAWAR ZOO. 91

In exercise of the powers under Rule-15(2) of (Appointment, Promotion & Transfer) Rules 1989 as well as Terms & Conditions at S.No.iii of Office Order No.07, dated 30.08.2019, the probation period of Mr. Majid Khattak S/O Istefar Hussain, Mali is hereby extended for another one year based on his poor performance, willful absence and inefficiency as reported by the Deputy Director, Administrative Officer of Peshawar Zoo and other supervising staff. Besides he is also 'censured' for his misconduct, inefficiency & lack of interest.

Moreover in case of his similar attitude in future he is liable to be terminated under provisions of Section-11(1)(i) of Khyber Pakhtunkhwa Civil Servants Act, 1973.

sd/-
(Iftikhar Uz Zaman)
Director/Conservator Wildlife
Peshawar Zoo

No. 382-87/WL (Zoo)



Copy for information and necessary action forwarded to:-

1. Chief Conservator Wildlife Khyber Pakhtunkhwa, Peshawar.
2. Deputy Director/DFO Wildlife Peshawar Zoo.
3. Admn: Officer/SDWO Peshawar Zoo.
4. Divl: Accountant/Disburser of Peshawar Zoo.
5. Official concerned.
- ✓ 6. Personal file.

Iftikhar Uz Zaman
Director/Conservator Wildlife
Peshawar Zoo

(Annex - III)

113


	OFFICE OF THE DIRECTOR/CONSERVATOR WILDLIFE PESHAWAR ZOO, PESHAWAR	
	Ph# 091-7252057 Email: zoopeshawar@gmail.com	
No. <u>1043</u> /Zoo.	Dated Peshawar the <u>2 / 11</u> /2020	

To,

Mr. Majid Khattak
Maali, Peshawar Zoo

Subject: **CHARGE SHEET**


Find enclosed herewith copy of charge sheet served to you under the inquiry conducted against you for information/ necessary action and intimation to this office as per rules.

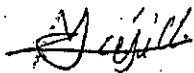

Director/Conservator Wildlife
Peshawar Zoo

No. 1044-45 /Zoo

Copy forwarded to the;

1. Chief Conservator Wildlife Khyber Pakhtunkhwa Peshawar for information please.
2. Administration officer Peshawar zoo for information.


Director/Conservator Wildlife
Peshawar Zoo



(2)

CHARGE SHEET

1. 1, Ishtiaq Ullah, Director Peshawar Zoo, as competent authority, hereby charge you Mr. Majid Khattak, Mali Peshawar Zoo, as follow:

That you, while posted as ~~Mali~~ Peshawar Zoo committed the following irregularities:


- (a) Inefficient or has ceased to be efficient,
- (b) Guilty of misconduct,
- (c) Guilty of habitually absenting yourself from duty without prior approval of leave.



- 2. By reason of the above, you appear to be guilty of inefficiency, misconduct and habitually absenteeism under rule 3 of the Khyber Pakhtunkhwa Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rule 4 of the rules ibid.
- 3. You are, therefore, required to submit your written defense within seven days of the receipt of this charge sheet to the inquiry officer, as the case may be.
- 4. Your written defense, if any, should reach the inquiry officer within the specified period, failing which it shall be presumed that you have no defense to put in and that case ex-parte action shall be taken against you.
- 5. Intimate whether you desire to be heard in person.
- 6. A statement of allegations is enclosed.

ISHTIAQ ULLAH
Director/Conservator Wildlife
Peshawar Zoo

Statement of allegations

1. That you have tendency to avoid orders and discipline intentionally.
2. You used to remain inactive unless and until directed by higher ups.
3. You avoid performing duty in the sun and always remain in search of comfort zone.
4. You remain absent on one pretext or other habitually.
5. That you politically pressurize higher ups for favor in avoiding your duty schedule.
6. You prefer to involve in gossips with zoo staff instead of performing duty.
7. You are habitual in misbehaving with Wildlife Watchers for reminding your tasks.
8. You are more interested in your domestic issues and least interested in official duty.


Director/Conservator Wildlife
Peshawar Zoo

	OFFICE OF THE DEPUTY DIRECTOR/DFO WILDLIFE PESHAWAR ZOO, PESHAWAR	
	Ph# 091-9221195 Email: ddirector66@gmail.com	
No. <u>196</u> /DD/Zoo	Dated Peshawar the <u>08/06</u> /2020	


To,

The Director/Conservator Wildlife
Peshawar Zoo,
Peshawar

Subject: INQUIRY REPORT AGAINST MR. MAJID KHATTAK, MALI
PESHAWAR ZOO

Reference: your office order No. 41 dated 13/05/2020

Kindly find enclosed herewith inquiry report against Mr. Majid Khattak, Mali Peshawar Zoo in intimation to your office order number referenced above for further course of action please.


Deputy Director/DFO Wildlife
Peshawar Zoo

INTRODUCTION

The undersigned has been nominated for conducting inquiry against Mr. Majid Khattak, Mali Peshawar Zoo vide Director Peshawar Zoo office order No. 41 dated 13/05/2020(Annex-I).

PROCEDURES

The following procedures have been adopted for conducting inquiry and arriving at logical conclusions.

1. Perusal of official record
2. Perusal of Attendance register
3. Inquiring his general conduct from Peshawar Zoo staff.
4. Personal interview with the said Mali.
5. Obtaining written response from Administration officer, wildlife watchers and Majid Khattak through questionnaire.

FACTS

Six gardeners (Mali) were inducted for Peshawar Zoo after completing relevant legal formalities by the selection committee vide Director Peshawar Zoo Officer order No. 07 dated 30/08/2019 (Annexure-II). Majid Khattak was one of them who joined his duty on 04/09/2019.

However, he was reported very unusual since his first day of joining the government job. The inquiry officer was the then administration officer of Peshawar zoo and had frequently warned him both verbally and in written about his unusual and casual behavior. He used to wander uselessly in zoo and indulge in unnecessary gossips all the day instead of performing duty honestly. He used to sit in shade to save his skin and avoid damaging his skin color. He usually avoided working in the sun and always used to be in search of comfort zone during duty hours. In this connection, he was served with letter by the then Deputy Director warning him about his lethargic physical performance and lacks of interest in official duty vide his office letter No. 1413 dated 08/09/2019 (Annexure-III). After that, he had to be directed from time to time for efficient duty performance. He has never been found performing duty actively by himself without censure and directions from higher ups. Fed up of verbal warning and incessant directives, he was served with letter about his lack of interest in duty vide administration officer letter No. 43/Ao/zoo dated 14/09/2019 (Annexure-IV). This proved to be a temporary remedy as he was compelled by his nature to avoid working in the sun and indulge in unnecessary gossips with everyone. He had also been reported going outside the zoo during duty hours to fetch milk for making tea and remained absent for hours under such pretension. He has also been observed inviting his relatives to Peshawar zoo and spending all the time with them instead of performing his due work. He is a habitual user of social media for which he has been reprimanded several times but to no avail. Consequently, he has been warned time and again to make him bound for duty. Back to his natural behavior, he was again warned through Administration Officer Letter No. 68/Ao/zoo dated 01/10/2019 (Annexure-V). As usual, he switched to his natural habit of avoiding duty and making willful absentees to be reported again for the repeated failures. He even did not regard his commitment he submitted in written to the administration officer. Every time he is censured for his misconduct, he pledged not to repeat it and then resorted to his troubling nature.

⑦

After that, he has been reported violating duty schedule, willful absence and lack of interest in duty. He was again reported leaving duty station before time without permission of his immediate officer vide administration officer letter No. 135/Ao/zoo dated 01/01/2020 (Annexure-VI). Consequently, he was warned along with other staff officials to mend his ways and means and ensure attendance according to duty schedule vide deputy director office letter No. 69-75/DD/zoo dated 03/01/2020 (Annexure-VIII). Similarly, explanation was called from him regarding lack of interest in duty vide administration officer letter No. 146/Ao/zoo dated 14/01/2020 (Annexure-VII). In response to this explanation, he submitted his reply to the administration officer which is self explanatory (Annexure-IX). He has been reported to the Deputy Director due to his late entry despite repeated verbal warnings vide Administration Officer letter No. 180/Ao/zoo dated 03/02/2020 (Annexure-X). Deputy director called explanation from him along with other two staff vide office letter No. 94-96/DD/zoo dated 06/02/2020 (Annexure- XI). In response, he submitted reply with lame excuses and which is self explanatory. (Annexure- XII). His conduct was also reported to the director Peshawar zoo for taking necessary measure against him vide Deputy director office letter No. 99/DD/zoo dated 06/02/2020 (Annexure-XIII). All such measures fell flat on him as he continued to show his casual and unacceptable behavior. He has been reported a consistent source of concern for the zoo administration. Felt no tangible result, administration officer reported him his citing lack of interest and weak performance vide letter No. 240/Ao/zoo dated 04/05/2020 (Annexure-XIV). In this letter, the administration officer has shown an extreme of displeasure towards him and requested his removal from government service as he would create heaps of problems once his probation period is over. In this connection, same request was also made by the deputy director to the director Peshawar zoo vide his office letter No. 161/DD/zoo dated 06/05/2020 (Annexure-XV). Resultantly, Director Peshawar Zoo ordered inquiry vide office Order. No. 41 dated 13/05/2020 (Annex-I).

The said Mali, Mr. Majid Khattak was personally interview. As usual, he started whiningly with lame excuses and hollow promises not to repeat the same blunders anymore. He was concerned more about his glory in case of strict action against him instead of learning any lesson from the repeated blunders till date.

A questionnaire was also handed over to him to obtain his stance in the matter (Annexure-XVI). He submitted his response (Annexure-XVII) repeating the same old and hollow pledges he usually adopts under such circumstances. His response is not satisfactory owing to his past and general conduct, reported and assessed so far.

A questionnaire was also communicated with Administration officer vide inquiry officer office letter No. 163 dated 18/05/2020 (Annexure-XVIII) in order to get his opinion about the said Mali. He submitted replies vide his office letter no. 254/Ao/zoo dated 29/05/2020 (Annexure-XIX). The response of Administration officer may be assessed which clearly indicates displeasure towards him. This show the level of his inefficiency, misconduct, lethargic nature and the troubles he created for zoo administration.

Solidifying general perception about his conduct and performance, the inquiry officer sought replies from wildlife watchers through questionnaire vide office letter No. 171 dated 02/06/2020 (Annexure-XX). The replies and perceptions of Wildlife Watchers about him are very alarming and show the extreme of discomfort about him. The replies are attached for ready reference as Annexure- XXI-XXX).


CONCLUSIONS/FINDINGS

After perusal of office record, assessing general conduct and evaluating overall performance of the said Mali i.e Mr. Majid Khattak, it is concluded as follow;

1. The accused Mali has tendency to avoid orders and discipline intentionally.
2. He used to remain inactive unless and until directed by higher ups.
3. He avoids performing duty in the sun and always remains in search of comfort zone.
4. He remains absent on one pretext or other habitually.
5. He politically pressurizes for favor in avoiding his duty schedule.
6. He prefers to involve in gossips with zoo staff instead of performing duty.
7. He is habitual to misbehave with Wildlife Watchers for reminding him tasks.
8. He is more interested in his domestic issues and least interested in official duty.
9. He is in probation and as per his appointment orders; he is liable to be removed from government service without any notice.

Recommendation:

In light of the above facts and ground realities, the inquiry officer recommends major penalty of removal from government service under Rule 4 of Khyber Pakhtunkhwa Government (Efficiency and Discipline rules), 2011.


ISHTIAQ ULLAH
Deputy Director Peshawar Zoo
(Inquiry Officer)

9




OFFICE ORDER NO. 58 DATED PESHAWAR THE 13 / 04 / 2021
ISSUED BY MR. ISHTIAQ ULLAH DIRECTOR/CONSERVATOR WILDLIFE
PESHAWAR ZOO

Mr. Majid Khattak has been a source of concern for zoo administration since his induction into government service as Gardener (Mali) BPS-03. He has been warned time and again to improve performance and official conduct. There is a long record of his casual behavior, apathy, willful absence and weak performance. Inquiry was also conducted against him due to his failure to improve performance and maintain discipline. Accordingly, he was charge sheet and later on show cause notice was issued as per E&D Rules, 2011. In response to his written reply, he was warned finally to shun the casual behavior and given opportunity to improve his ways and means. His probation period has also been extended on the above mentioned grounds.

But it has been noted that he avoids duty on one pretext and other and instead roam here there in zoo despite his assurance and commitment for efficient duty. Gossips with visitors and other zoo staff has been his routine habit instead of focusing on his assigned job.

All measures to bring him on right track, improve his performance has been exhausted but still there is no improvement in his overall conduct. Willful absenteeism has been his persistent behavior.

Consequently, he is hereby removed from government service under Section 4(iii) of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and Section 11(1)(i) of the Civil Servant Act 1973 in the interest of public and maintaining discipline in Peshawar Zoo administration.


Director/Conservator Wildlife
Peshawar Zoo

No. 1 / Zoo


Copy forwarded to;

1. Chief Conservator Wildlife Khyber Pakhtunkhwa for information please.
2. Administration officer Peshawar Zoo for information and necessary action with reference to his latest letter No. 484/AO/zoo dated 08/04/2021.
3. Veterinary Officer Peshawar Zoo for information.
4. Majid Khattak, Mali Peshawar Zoo.
5. Accountant Peshawar Zoo for necessary action.
6. Personal file of the official.

Director/Conservator Wildlife
Peshawar Zoo

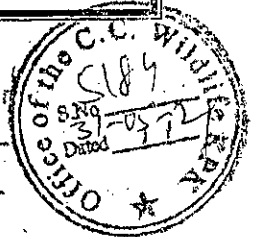
(Annex-VI)

169

	<p align="center">GOVERNMENT OF KHYBER PAKHTUNKHWA FORESTRY, ENVIRONMENT & WILDLIFE DEPARTMENT</p> <p align="center">NO.SO(Estt)/FE&WD/1-43/2020/KC Dated Peshawar the, 28th May, 2021</p>
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To
 The Chief-Conservator Wildlife,
 Khyber Pakhtunkhwa,
 Peshawar.

Office of the PD/CWL
 Peshawar Zoo, Peshawar
 Diary No. 964
 Dated 3-6-2021



Subject: **APPLICATION FOR RE-INSTATEMENT IN SERVICE**

I am directed to refer to the subject captioned above and to enclose herewith a copy of an application dated 19th May, 2021 alongwith its enclosures in respect of Mr. Majid Khattak S/o Istifar Hussain, Ex-Mali Peshawar Zoo.

In this regard, it is requested to look into the matter and take necessary action strictly as per the rules/policy under intimation to this department, please.

Encl: As above

[Signature]
SECTION OFFICER (ESTT)

Endst: No: & date even

Copy is forwarded for information to PS to Secretary, Forestry, Environment & Wildlife department, Khyber Pakhtunkhwa.

[Signature]
SECTION OFFICER (ESTT)

No. 9068 WL (B-X-08)

Dated Peshawar the 31 /05/2021

Copy alongwith its enclosure forwarded to Director/Conservator Wildlife Peshawar Zoo for submission of his comments.

*He is a habitual liar
 and making false claims
 to prove himself innocent.*
[Signature]
 3/4/2021

[Signature]
 Chief Conservator Wildlife
 Khyber Pakhtunkhwa
 Peshawar

11

بخدمت جناب سیکریٹری وائلڈ لائف پشاور چڑیا گھر خیبر پختونخواہ

عنوان: ایپل برائے بحالی سروں

جناب عالی!

سائل حسب ذیل عرض رساں ہیں:-

- 1- یہ کہ سائل حکیم گھڑی پشاور کا مستقل اور باعزت رہائشی ہے۔
- 2- یہ کہ سائل محکمہ وائلڈ لائف پشاور چڑیا گھر میں بطور مالی ایبٹی ڈیوٹی سرانجام دے رہا تھا۔
- 3- یہ کہ سائل کا والد صاحب ایک عمر رسیدہ شخص ہے اور موجودہ دباہ کی وجہ سے والد ام بھی کر دنا کا شکار ہو گئے تھے۔ جسکی وجہ سے سائل سخت زہنی اذیت میں مبتلا تھے اور تیار داری کے لیے سائل کے علاوہ دیگر کوئی نہیں تھا اور تمام تر ذمہ داری سائل پر تھی اور سائل بھی دن رات والد ام کی خدمت اور تیار داری میں لگا رہا تھا۔ جس کی وجہ سے سائل ڈیوٹی سرانجام دینے سے قاصر رہا تھا۔ اور اس بابت سائل نے ڈائریکٹر اور ایڈمن کو بذریعہ فون آگاہ کیا تھا کہ سائل چونکہ سخت اذیت سے گزر رہا ہے اس لیے سائل کو چھٹی عنایت کرے تاکہ سائل اپنے والد کی تیار داری کر سکے۔

4- یہ کہ تقریباً ایک ہفتہ تک سائل اپنے والد ام کے ساتھ دن رات ہسپتال اور گھر میں تیار داری میں مصروف رہا اس دوران سائل کو پتہ چلا کہ متعلقہ محکمہ نے سائل کو درخواست کرنے کا لیکر تیار کیا ہے۔ اس لیے سائل اپنے بیمار باپ کو اللہ کے سرے پر چھوڑ کر جب اپنے ڈیوٹی کے لیے آیا تو سائل کو آفس آرڈر نمبر 58 بمورخہ 13 اپریل 2021 حوالہ کیا گیا کہ آپ کو نوکری سے درخواست کیا گیا ہے۔

اس لیے استدعا ہے کہ سائل چونکہ ایک غریب گھرانے سے تعلق رکھتا ہے اور گھر کی کفالت کا سارا دار و مدار اس نوکری پر ہے اس لیے گزارش ہے کہ متعلقہ حکام کو ہدایت جاری فرمائی جاوے کہ مذکورہ بالا آفس آرڈر کو منسوخ کر کے سائل کو اپنی ملازمت پر بحال کیا جائے کیونکہ نہ تو سائل کو کوئی اطلاع دی گئی تھی نہ کوئی نوٹس نہ اخبار میں اشتہار وغیرہ اور اس سے پہلے سائل کی نوکری کا ریکارڈ بھی مکمل صاف ستھرا ہے اس لیے نہ صرف سائل بلکہ سائل کے پورے خاندان کے ساتھ ایک ظلم اور نا انصافی ہے چونکہ سائل اپنے ضعیف اور بیمار والد صاحب کی خدمت اور تیار داری کی وجہ سے سائل کو سزاوی جاری ہے جو کہ سراسر ظلم اور نا انصافی ہے اس لیے استدعا ہے کہ فوری نوٹس لیا جائے تاکہ سائل کو اپنے حق سے محروم نہ کیا جاسکے۔

سائل اور سائل کے تمام گھروالے تاحیات آپ کے لیے دعا گو رہینگے۔

عین نوازش ہوگی۔

المرقوم: 19 مئی 2021

العبد: Rajid

ماجد تنگ ولد استفار حسین (مالی وائلڈ لائف پشاور چڑیا گھر)

موبائل نمبر: 03159716863

ایک عدد کاپی برائے

SO (Estt)

85/ASCA

1- چیف سیکریٹری پشاور خیبر پختونخواہ

2- مکتبہ، شہزاد پور، اسلام آباد

خدمت جناب چیف ایگزیکٹو آفیسر وائلڈ لائف لیشاور
مختون - اپریل 2021ء

Office of the DD/OWL
Peshawar Zoo, Peshawar
Diary No. 965
Date: 3-6-2021

ضابطہ: اگر ایش خدمت معذرت سائل وائلڈ لائف جسٹریٹریٹ میں بطور مالی پین
ڈیوٹی کے دوران بیمار ہوئے۔ اس کے والدین کے پاس سے اور موجودہ کورونا
بیماری کے دور میں بیمار ہوئے۔ جنکی دیگر سہیل کے کوئی دوسرا فرد نہ تھا۔ سائل
اسی پر ایمپلائمنٹ میں دن رات والدین بیمار رہے صرف سائل نے باقاعدہ ڈاکٹر کے
ایکسٹرن کو بند کیا۔ فون الٹا کر دی تھی۔ اور طبی کی ایش کر دی تھی۔ اس ضمن میں گورنمنٹ
کی ہدایت بھی موجود ہے جن پر عمل درآمد کی ہدایت تھی۔ سائل ایک ہفتہ والدین بیمار جاری
میں مصروف رہا۔ حالانکہ گورنمنٹ کی ہدایت میں بھی گنجائش بنتی ہے۔

ضابطہ: سائل کو بہت جلد حکم سے حلف یکلر کا روای کرنے کو ہے اور بہر حال سائل کا
سائل خودی والا ہے۔ کو بیمار کی حالت میں حضور فرما کر دفتر حاضر ہو گیا۔ اور دفتر سے
آف آؤٹ رہا۔ دیکھا کہ تم فارغ ہو۔ آؤٹ کی کاپی لف ہٹا ہے۔

ضابطہ: اگر ایش خدمت سائل نے باقاعدہ دفتر الٹا کر دی تھی۔ کوئی نوٹس نہیں دیا گیا
نہ کو وہ پورے تھی۔ سائل کو ای ایم ایڈی رولنگ 2011 سے کٹ لٹال دیا گیا۔ سائل حلف
کسی قسم کی ایڈوائس نہیں ہے۔ نہ ہی جواب طلبی صوبی یکلرنگ کا والی عمل میں لائی گی جو
سائل کے حکم ہے

ضابطہ: سائل کے صوبے حضور ہے۔ والدین کے بیمار کی حالت میں ہے۔ اگر
ادوات کا کوئی ڈیویژن ہے۔ بچے نفسیاتی ریفٹ بننے جا رہے ہیں۔ حضور والا صرف اپنی
گزارش ہے۔ سائل کے حال پر لکھ کر آفس آؤٹ کر لیا ہے۔ حضور والا کو حضور
غیر تکرار ہو رہا ہے۔ سائل کو ذاتی طور پر حکم دیا کہ وہ پورے تھی ہے۔ امیر حکیم سائل
کے ساتھ مکمل لائف و فٹنس ہے۔

عین فوٹو کے سائل کی No-91
1/6/2021

حاضر شدہ دلہ استفسار میں ماں وائلڈ لائف لیشاور جسٹریٹریٹ
Forwarded to Director/OWL 0315-9716863
for n/a and
submission of his comm
as already asked with
office email No. 9068/2021
Date: 31-5-2021

Seen 4/6/2021

1/6/21
Director Wildlife
Khyber Pakhtunkhwa
Peshawar

13

OFFICE ORDER NO. 171 DATED PESHAWAR THE 17-06 /2021, ISSUED BY 187
DR. MOHSIN FAROOQUE, CHIEF CONSERVATOR WILDLIFE, KHYBER PAKHTUNKHWA, PESHAWAR. 1015
Diary No. 1015

Mr. Majid Khattak, Ex-Mali of Peshawar Zoo was proceeded against under Rule-09 of Efficiency & Discipline (E&D) Rules 2011 by Director/Conservator Wildlife Peshawar Zoo vide office order No.141 dated 13/05/2020 for the charges/allegations of willful absence from duty and inefficiency etc. as mentioned in the show cause notice, served upon the said official.

The Director/ Conservator Wildlife Peshawar Zoo appointed the Deputy Director Peshawar Zoo as an enquiry officer vide above office order to proceed against the accused official.

It is worth mentioning that the probation period of the incumbent Ex-Mali was also extended vide Director/Conservator Wildlife Peshawar office order No.13 dated 25/08/2020 whereby also censured him and directed that in case of his similar attitude in future he will be liable to be terminated from service as per Section-11(1)(i) of Khyber Pakhtunkhwa Civil Servants Act 1973. The above Ex-official has not mend his ways and kept the same bad attitude towards official duty.

The enquiry officer conducted the enquiry against the accused officer and submitted his report vide his letter No.186/DD/ZOO dated 06/06/2020. After perusal of record and obtaining written reply of accused official, the enquiry officer concluded following:

"The accused Mali has tendency to avoid orders and discipline intentionally. He used to remain inactive unless and until directed by higher ups. He avoids performing duty in the sun and always remains in search of comfort zone. He remains absent on one pretext or the other habitually. He politically pressurizes for favour in avoiding his duty schedule. He prefers to involve in gossips with zoo staff instead of performing duty. He is habitual to misbehave with Wildlife Watchers for reminding him tasks. He is more interested in his domestic issues and least interested in official duty. He is in probation and as per his appointment orders, he is liable to be removed from government service without any notice".


Consequently, the inquiry officer recommended a major penalty of "removal from government service under Rule-4 of Khyber Pakhtunkhwa Govt: (Efficiency and Discipline) Rules, 2011", which was imposed against Mr. Majid Khattak, Ex-Mali vide Director/Conservator Peshawar Zoo office order No.58 dated 13/04/2021.

Subsequent to imposition of major penalty on 13/04/2021, Mr. Majid Khattak, Ex-Mali of Peshawar Zoo have preferred two (02) review petitions/appeals, amongst which one was received through Section Officer (Establishment), FE&WD letter No.SO(Estt)/FE&WD/1-43/ 2020/KC dated 28/05/2021, while an another appeal on 01/06/2021 directly to this office respectively. The appeals were forwarded to the Director/ Conservator Wildlife Peshawar Zoo for comments vide this office endsts No.9068/WL(B-X-08) dated 31/05/2021 & No.9135/WL dated 01/06/2021. The Director/ Conservator Wildlife Peshawar Zoo has offered his comments vide his letter No.2089/Zoo dated 03/06/2021, whereby he concluded that: "His reinstatement will badly effect the Zoo environment and will encourage others to follow suit. He therefore deserves no leniency".

Moreover, as per E&D Rules, both the appeals of dated 19/05/2021 and dated 01/06/2021 are time barred because Mr.Majid Khattak has preferred an appeal after a period of thirty (30) days from the date of termination i.e.13/04/2021, which on one hand show that he has no respect for time and keeping habitually absent from duty for long time is his habit and simultaneously time barred appeal is liable to be rejected. However, he was given chance of personal hearing to explain his position.

While, the undersigned, being appellate authority in the case, after having considered the enquiry report, the stance of Director/Conservator Wildlife Peshawar Zoo, the appeal of the accused official and based on personal hearing on 15/06/2021, concluded that Mr.Majid Khattak, Ex-Mali of Peshawar Zoo has discipline issues leading to misconduct. He could neither provide convincing arguments nor has documentary proof in his defense.

Therefore based on the above factual position and exercising the powers under Rule-17(2)(a) of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, reject the appeal of Mr. Majid Khan, Ex-Mali (BPS-03), Peshawar Zoo and uphold the major penalty of "removal from service" upon him from the date he has been awarded penalty.


(Dr. Mohsin Farooque)
Chief Conservator Wildlife
Khyber Pakhtunkhwa
Peshawar.

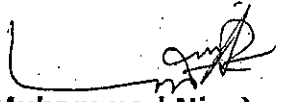
No. 9604-06 /WL (E)

Copy forwarded for information and necessary action to the:

1. Section Officer (Establishment) with reference to his letter No.SO(Estt)/FE&WD/1-43/ 2020/KC dated 28/05/2021
2. Director/Conservator Wildlife Peshawar Zoo with reference to his letter 2089/Zoo dated 03/06/2021

OFFICE ORDER NO. 36 DATED 06/12 /2022
ISSUED BY MUHAMMAD NIAZ DIRECTOR/ CONSERVATOR WILDLIFE
PESHAWAR ZOO, PESHAWAR


In compliance to the order of the Khyber Pakhtunkhwa as per Judgment of the Honorable Service Tribunal dated 01/11/2022 in service appeal No.6728/2021. Mr. Zia ur Rehman, Divisional Forest Officer Wildlife, Merged Areas Integrated Development Project Wildlife Component is hereby appointed to conduct "De-novo" enquiry proceeding against Mr. Majid Khattak, Ex-Mali (BPS-03) at Peshawar Zoo Wildlife Department and submit report within 45 days positively.


(Muhammad Niaz)
Director/Conservator Wildlife
Peshawar Zoo, Peshawar.



No. 1373-76 /Zoo,

Copy forwarded for information and necessary action to the:-

1. Chief Conservator Wildlife Khyber Pakhtunkhwa for favor of information.
2. The Project Director/Conservator Wildlife Merged Areas Integrated Development Project Wildlife Component for favor of information.
3. Mr. Zia ur Rehman Divisional Forest Officer Wildlife Merged Areas Integrated Development Project Wildlife Component for favor of information and compliance.
4. Deputy Director Wildlife Peshawar Zoo to provide record to the enquiry officer.


Director/Conservator Wildlife
Peshawar Zoo, Peshawar

(Annex-X)


	OFFICE OF THE DIRECTOR/CONSERVATOR WILDLIFE, PESHAWAR ZOO PESHAWAR	
	Main Palosi Road Rahatabad, Opposite Pakistan Forest Institute, Peshawar, Phone: 091-7256677 Email: zoopeshawar@gmail.com	
No. 1440 /P-Zoo	Dated: 13/12/2022	

To

**Mr. Majid Khattak
Ex-Mali, Peshawar Zoo**

Subject: CHARGE SHEET

Find enclosed herewith charge sheet alongwith statement of allegations served to you under the "De-novo" inquiry conducted against you for information necessary action. Your reply must be submitted to the enquiry officer within stipulated time.


**Director/Conservator Wildlife
Peshawar Zoo, Peshawar**

CHARGE SHEET

1. I, Muhammad Niaz, Director/Conservator Peshawar Zoo, as competent authority, hereby charge you Mr. Majid Khattak, Mali Peshawar Zoo, as follow:

That you, while posted as Mali Peshawar Zoo committed the following irregularities:

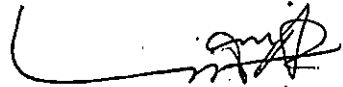
- (a) Inefficient or has ceased to be efficient,
 - (b) Guilty of misconduct,
 - (c) Guilty of habitually absenting yourself from duty without prior approval of leave.
2. By reason of the above, you appear to be guilty of inefficiency, misconduct and habitually absenteeism under rule 3 of the Khyber Pakhtunkhwa Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rule 4 of the rules ibid.
3. You are, therefore, required to submit your written defense within seven days of the receipt of this charge sheet to the inquiry officer, as the case may be.
4. Your written defense, if any, should reach the inquiry officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to be heard in person.
6. A statement of allegations is enclosed.



(Muhammad Niaz)
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

STATEMENT OF ALLEGATIONS

- i. That you have tendency to avoid orders and discipline intentionally.
- ii. You used to remain inactive unless and until directed by higher ups.
- iii. You avoid performing duty in the sun and always remain in search of comfort zone.
- iv. You remain absent on one pretext or other habitually.
- v. That you politically pressurize higher ups for favor in avoiding your duty schedule.
- vi. You prefer to involve in gossips with zoo staff instead of performing duty.
- vii. You are habitual in misbehaving with Wildlife Watchers for reminding your tasks.
- viii. You are more interested in your domestic issues and least interested in official duty.



Director/Conservator Wildlife
Peshawar Zoo, Peshawar



OFFICE OF THE
DIVISIONAL FOREST OFFICER WILDLIFE COORDINATION &
EXTENSION "MERGED AREAS INTEGRATED DEVELOPMENT
FORESTRY SECTOR PROJECT UNDER TRIBAL DECADE STRATEGY
(WILDLIFE CONSERVATION AND DEVELOPMENT)"
STREET NO. 03 ABBSHAR COLONY NEAR MASJID USMAN KABABYAN
CHOCK WARSAK ROAD, PESHAWAR.
E-mail ID: pdmergedarea@gmail.com



(Annex - XI)

No: 5160 W/L (AIP)

Dated Peshawar the 16/12/2022

To

Mr. Majid Khattak (Ex- Mall)
Peshawar Zoo
C/O Director Peshawar Zoo

Subject: REPLY TO THE CHARGE SHEET AND PERSONAL HEARING

A charge sheet has already been served upon you by the Director Peshawar Zoo (Competent Authority) wherein you have been directed to submit your written defense, if any, to the inquiry officer within Seven days.

The undersigned has been appointed as Inquiry Officer in the case under consideration vide Director/Conservator Wildlife, Peshawar Zoo office order No. 36 dated 06/12/2022. You are therefore directed to submit your written reply, if any, immediately as well as attend office of the undersigned on 27/12/2022, at 10:00 am for personal hearing in the case.

Zia ur Rahman
Zia ur Rahman
Coordination & Extension
Divisional Forest Officer Wildlife
MAI Forestry Sector Project
(Wildlife Component)
Peshawar
16/12/22

No. W/L (AIP)

Copy forwarded to Director/Conservator Peshawar zoo for information and necessary action. He is requested to deliver the letter to the above mentioned accused after getting his acknowledge on the same, please.

17201-247948-7
Majid

Coordination & Extension
Divisional Forest Officer Wildlife
MAI Forestry Sector Project
(Wildlife Component)
Peshawar

(19)

SCANNED
KPST
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No: 6728/2021



BEFORE: SALAH UD DIN --- MEMBER(J)
MIAN MUHAMMAD --- MEMBER(E)

Majid Khattak, Ex-Mali (BPS-03) at Peshawar Zoo, Wildlife Department, Khyber Pakhtunkhwa, Peshawar..... (*Appellant*)

VERSUS

1. Chief Conservator, Wildlife Department, Khyber Pakhtunkhwa, Peshawar.
2. Director/Conservator, Peshawar Zoo, Wildlife Department, Khyber Pakhtunkhwa, Peshawar.
3. Administrative Officer, Peshawar Zoo, Wildlife Department, Khyber Pakhtunkhwa, Peshawar..... (*Respondents*)

Present:

MUHAMMAD ARSALAN AFRIDI,
Advocate --- For Appellant.

ASIF MASOOD ALI SHAH,
Deputy District Attorney --- For respondents.

Date of Institution.....02.07.2021

Date of Hearing.....01.11.2022

Date of Decision.....01.11.2022

JUDGEMENT.

MIAN MUHAMMAD, MEMBER(E):- The instant service appeal has been instituted with the prayer that "on acceptance of this appeal the impugned orders dated 17.06.2021 and 13.04.2021 of the respondents may kindly be set aside and the appellant may be reinstated to his post (Mali BPS-03) with all back benefits admissible under the law and rules".

ATTESTED

Secretary, Peshawar
Khyber Pakhtunkhwa Service Tribunal

02. Brief facts, as averred in the memorandum of service appeal, are that the appellant was appointed in the respondent department as Mali (BPS-03) on 30.08.2019. The appellant was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 and he was imposed upon the major penalty of removal from service vide office order dated 13.04.2021. Feeling aggrieved, the appellant filed departmental appeal on 19.04.2021 which was rejected by the appellate authority vide office order dated 17.06.2021, hence the instant service appeal filed on 02.07.2021.

03. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions raised by the appellant in his appeal. We have heard learned counsel for the appellant as well as learned Deputy District Attorney for the respondents and have gone through the record with their valuable assistance.

04. Learned counsel for the appellant vehemently contended that the major penalty of removal from service has been imposed upon the appellant on the allegations of willful absence from duty as well as weak performance but the period during which the appellant remained absent from duty has not been specifically mentioned in the impugned order, which is against the law and rules. The absence of appellant was not intentional but it was due to his illness and in this respect he had also submitted medical prescriptions, which were not considered

ATTESTED

 EXAMINER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

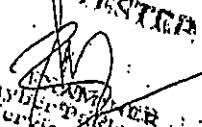
found unsatisfactory. Moreover, formal and regular enquiry was conducted against the appellant and he was provided ample opportunity of personal hearing but neither he could advance convincing arguments nor he provided any documentary proof in his defence to be innocent. The appellant was removed from service on 13.04.2021, after fulfillment of all codal formalities. The appellant was required to file departmental appeal within one month but he filed the department appeal on 01.06.2021 which was barred by time, hence the service appeal is liable to be dismissed with costs, he concluded.

06. Careful perusal of the record reveals that the appellant was appointed as Mali (BS-03) vide office order dated 30.08.2019. He was proceeded against on allegations of inefficiency, misconduct and habitual absenteeism vide charge sheet/statement of allegations issued on 02.11.2020. The inquiry was ordered and conducted vide office order No. 41 dated 13.05.2020 as is evident from introduction in the enquiry report. However, no copy of such office order to have been issued, was produced by the respondents. Astonishingly, the charge sheet issued to the appellant on 02.11.2020 was signed by the Director/Conservator Wildlife Peshawar Zoo (Mr. Ishtiaq ullah) who also conducted enquiry against the appellant as Deputy Director Peshawar Zoo 06 months before issuance of the charge sheet and statement of allegations. The appellant was issued Show Cause Notice by the same person on 23.11.2020 and

ATTESTED
 [Signature]
 Sybil Faruk
 Service Tribunal
 Peshawar

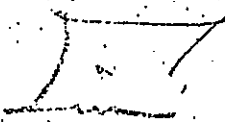
finally the impugned order of imposition of major penalty of removal from service was issued by the same officer on 13.04.2021. So much so that when departmental appeal was submitted to the same officer on 19.04.2021 vide Diary No. 870, it was summarily "rejected" the same day instead to have forwarded it to the appellate authority under Rule 4 (2) of the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986. The departmental appeal was therefore, submitted well within the statutory period and no question of limitation arises to hit the instant service appeal before the Service Tribunal. In the entire scenario and circumstances explained before this Bench, only the appellate order dated 17.06.2021 was issued by respondent No. 1 (Chief Conservator Wildlife) who rejected departmental appeal of the appellant on 17.06.2021.

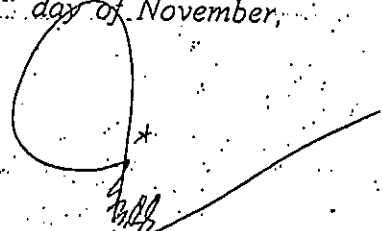
07th In view of the preceding Paras, we found that the enquiry proceedings have not been conducted in accordance with laid down procedure and in the prescribed manner under the law and rules. The appellant has been deprived of and negated the fundamental right of fair chance of an impartial enquiry through an independent enquiry officer as well as ample opportunity of self defence to prove himself innocent. The ends of natural justice have therefore, not been met when the appellant was treated in surmise and whimsical manner by the same person in the enquiry proceedings. We are therefore, constrained to remit the case to the respondents with the direction to conduct De-novo

ATTORNEY

 Attorney General
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

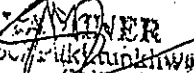
enquiry proceedings against the appellant strictly in accordance with the law and rules providing him the opportunity of personal hearing and cross examination, within one month of receipt of this judgement. Parties are left to bear their own costs. File be consigned to the record room.

08. Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 1st day of November, 2022.

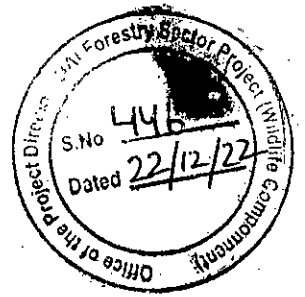

(SALAH UD DIN)
MEMBER (J)


(MIAN MUHAMMAD)
MEMBER (E)

Certified to be true copy


Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 02/12/22
Number of Words 2400
Copying Fee 26/-
Urgent 4/-
Total 30/-
Name of Copy _____
Date of Completion of Copy 01/12/22
Date of Delivery of Copy 01/12/22



To,

The Coordination & Extension
Divisional Forest Officer Wildlife
MAI Forestry Sector Project
(Wildlife Component) Peshawar
(Inquiry Officer Mr. Zia Ur Rahman)

Subject: Reply of Charge sheet in statement of allegation issued against Mr. Majid Khattak (Ex-Mali) Peshawar Zoo, dated: 22-12-2022.

That the petition submits parawise reply of the allegations as under:

→ 1. As to the Para No.1 I would humbly submit that I have performed my duties according to the orders of the superior authority and have not violated any order of the superior authority, moreover, petitioner remained disciplined & the entire allegations in the alleged para is totally wrong, baseless and without proof, hence the same may not be kindly consider against the petitioner.

→ 2. In reply to Para No. 02 it is humbly submitted that I used to remain active & worked hard as a Mali being poor person, Moreover the allegation is baseless as already stated in the preceding para & the petitioner have never violated the orders of high ups & remains obedient.

→ 3. In reply to Para No. 03 it is humbly submitted as I already stated that I am a poor person & have work hard without preferring comfort zone use to remain under the hot rays of the sun during the duty hours, hence, the allegation may kindly be rejected in favor of petitioner.

→ 4. In reply to Para No. 04 it is submitted that unfortunately in year 2021 the petitioner & then his father fell ill & later on the petitioner father was diagnosed Covid -19 due to which he quarantined himself with his father, & couldn't attend the office & perform his duties in those days. (copy of Medical script is annexed)

→ 5. In reply Para No. 05 it is submitted that I am a poor person & worked in the department as Mali. It is astonishing that how a poor person being Mali could approach political high UPS,

(20)

for pressurizing baseless, wrong & may kindly be rejected in favour of petitioner.

- 6. In reply to Para No. 06 it is submitted that the entire para is wrong as there is no single statement of any person with whom I have gossips while performing my duties, hence the para may kindly be rejected in favor of petitioner.
- 7. In reply to Para No. 7 it is submitted that I have never misbehaved with wild life watchers & I myself perform all tasks given by high UPS & there in no single statement of wild life watchers that I have misbehaved with them, hence Para may kindly be rejected in favor of petitioner.
- 8. In reply to Para No. 8 it is submitted that I have performed my duties according to the orders & was never interested in the domestic issues, however being human I was facing server diseases as well as caring my father being quarantine with him during covid-19 for which I have taken proper leaves from high UPS accordingly, Moreover the entire allegation in charge sheet is baseless without circumstantial evidence based on presumption & assumptions, hence , the entire allegation may kindly be rejected.

It is therefore humbly prayed that my Para wise reply may kindly be considered & reinstate the petition along with back benefit admissible by law being the only source of income for entire family of the petitioner.

Petitioner *Majid*
Majid Khattak
(Ex-Mali)
Peshawar zoo
CNIC: 17201-2479145-7
Mobil # 0315-9716863

(21)



OFFICE OF THE
DIVISIONAL FOREST OFFICER WILDLIFE COORDINATION &
EXTENSION "MERGED AREAS INTEGRATED DEVELOPMENT
FORESTRY SECTOR PROJECT UNDER TRIBAL DECADE STRATEGY
(WILDLIFE CONSERVATION AND DEVELOPMENT)"
STREET NO. 03 ABBSHAR COLONY NEAR MASJID USMAN KABABYAN
CHOCK WARSACK ROAD, PESHAWAR.
E-mail ID: pdmergedarea@gmail.com



No. 5160 /WL (AIP)

Dated Peshawar the 16/12/2022

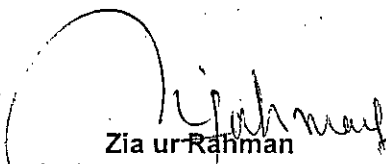
To

Mr. Majid Khattak (Ex- Mali)
Peshawar Zoo
C/O Director Peshawar Zoo

Subject: REPLY TO THE CHARGE SHEET AND PERSONAL HEARING

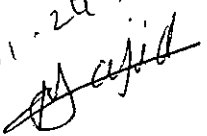
A charge sheet has already been served upon you by the Director Peshawar Zoo (Competent Authority) wherein you have been directed to submit your written defense, if any, to the inquiry officer within Seven days.

The undersigned has been appointed as Inquiry Officer in the case under consideration vide Director/Conservator Wildlife, Peshawar Zoo office order No. 36 dated 06/12/2022. You are therefore directed to submit your written reply, if any, immediately as well as attend office of the undersigned on 27/12/2022, at 10:00 am for personal hearing in the case.


Zia ur Rahman
Coordination & Extension
Divisional Forest Officer Wildlife
MAI Forestry Sector Project
(Wildlife Component)
Peshawar

No. / WL (AIP)

Copy forwarded to Director/Conservator Peshawar zoo for information and necessary action. He is requested to deliver the letter to the above mentioned accused after getting his acknowledge on the same, please.

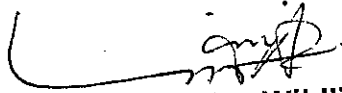
17201-2478148-7


Coordination & Extension
Divisional Forest Officer Wildlife
MAI Forestry Sector Project
(Wildlife Component)
Peshawar

22

STATEMENT OF ALLEGATIONS

- i. That you have tendency to avoid orders and discipline intentionally.
- ii. You used to remain inactive unless and until directed by higher ups.
- iii. You avoid performing duty in the sun and always remain in search of comfort zone.
- iv. You remain absent on one pretext or other habitually.
- v. That you politically pressurize higher ups for favor in avoiding your duty schedule.
- vi. You prefer to involve in gossips with zoo staff instead of performing duty.
- vii. You are habitual in misbehaving with Wildlife Watchers for reminding your tasks.
- viii. You are more interested in your domestic issues and least interested in official duty.

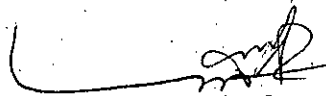

Director/Conservator Wildlife
Peshawar Zoo, Peshawar

CHARGE SHEET

1. I, Muhammad Niaz, Director/Conservator Peshawar Zoo, as competent authority, hereby charge you Mr. Majid Khattak, Mali Peshawar Zoo, as follow:

That you, while posted as Mali Peshawar Zoo committed the following irregularities:

- (a) Inefficient or has ceased to be efficient,
 - (b) Guilty of misconduct,
 - (c) Guilty of habitually absenting yourself from duty without prior approval of leave.
2. By reason of the above, you appear to be guilty of inefficiency, misconduct and habitually absenteeism under rule 3 of the Khyber Pakhtunkhwa Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rule 4 of the rules ibid.
3. You are, therefore, required to submit your written defense within seven days of the receipt of this charge sheet to the inquiry officer, as the case may be.
4. Your written defense, if any, should reach the inquiry officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to be heard in person.
6. A statement of allegations is enclosed.


(Muhammad Niaz)
Director/Conservator Wildlife
Peshawar Zoo, Peshawar

24

Col. Dr. Muhammad Farooq Malik

MBBS (Pak), DIM (Pak) RSCPHS (Saudi Arabia), FCPS (Pak)
DIT Infectious Disease (United Kingdom)
Classified Medical and Infectious Diseases Specialist
Associate Professor of Medicine
Head of Department of Medicine CMH Nowshera



11

پروفیسر کرنل ڈاکٹر
محمد فاروق ملک

ایم بی بی ایس (پاک)، ڈی آئی ایم (پاک)، ایم ڈی ایس ایف ایف (سعودی عرب)
ایم بی بی ایس (پاک)، ڈی ایس ڈی (انگلینڈ)
کلاسفائیڈ میڈیکل اینڈ انفیکٹس ڈیزیز سپیشلسٹ
ایسوسی ایٹ پروفیسر آف میڈیسن آف سی ایم این او ایف
ہیڈ آف ڈیپارٹمنٹ آف میڈیسن سی ایم این او ایف

Name: Ikhtad Hussain Age: 65y Wt: -

Date: 05-07-21 BP: 120/70

Clinical Data	S.No	Drug	Dose	Route	Timing			Other Advice
					صبح	دوپہر	شام	
Temp 100°	1	TD Cotinyl	4g		1	-	-	سے 5
RPR-198	2	TD Sitaram	(50/100)		1	-	1	
	3	TD DAPA	10g		1	-	-	
DM (low)	4	TD Loprin	75g		1	-	-	
	5	TD Rolip	10g		-	-	1	
COVID-19 (Clinical)	6	TD Rozestral	1g		1	-	1	5 سے 12
Chest/sept	7	TD Esotape	40g		1	-	-	
	8	TD Cal Dew			1	-	-	
	9	Temp Megnum-2			1	-	-	
	10	ly. MD ₃	(200, 100)					ایک نسخہ ملائیں
	11							
	12							

For PA Appointment: Mishal Mehmood # 0345-1303099

ATTESTED

to be four copy

Mishal Mehmood
Advocate
05/7/21

25

by Kim brook (2g) 1/2 shot & OD (17-A)
 D22 A 2.omyer (8007) 1/2 shot 04
 Vantlin 2eb (1-1) X TD 37

Plan

- by - Remdesivir 200 mg IV shot - Day 1
 100 mg IV X OD - 4 days (from Day 2)

- by - Decision of 1/2 X OD if (COVID) +ve

Investigation:-

- CBC 1000
- CRP (Quantitative) 250
- ESR 250
- Urea / Creatinine / Na / K 250
- Bilirubin / ALT / ALP 250
- HbA1c 250
- Hbs Ag
- Anti-HCV
- TSH
- Vitamin D Level
- Urine RE / CS / Microalbuminuria 150
- Stool RE / CS / Occult blood
- ECG 250

- X-Ray
- USG Abdomen / Pelvis / Doppler
- CT Scan H/O CT chest
- MRI
- Sputum RE / CS / AFB / Genexpert
- Culture Sensitivity
- PCR (Quantitative) for COVID-19
- HIV
- 2-D Echo
- EFT
- Spirometry
- CT Angio
- Others

Dr. Muhammad Farooq
 MBBS (Punjab), MD (Punjab), DNB (Punjab)
 USCLHS (USCLHS), FRCGS (UK), FRCR (UK)
 Associate Professor of Medicine
 Head of Department of Medicine
 GAG Hospital, Lahore, PAK.

ATTESTED

to be true copy

[Signature]
 Advocate
 05/7/21

(26)

Flow
k
10

(ضروری روایات)

Sr.No. 6716

برائے مہربانی آئندہ وزٹ پر رسید ضرور ساتھ لائیں

Receipt For Outdoor Consultation Fee

Received a sum of Rs. 800/- (Rupees)

in account of 1st / subsequent visit consultation fee from, CNE

Iftikhar Hussain referred to

Patient's Address: Lt Col M. Farooq Spec

Contact No

CMH Nowshera Cantt
Dated: 5/4/2021

(Account Clerk)

Original.....
Duplicate.....
Triplicate.....

(ضروری روایات)

Sr.No. 7162

برائے مہربانی آئندہ وزٹ پر رسید ضرور ساتھ لائیں

RECEIPT FOR OUTDOOR PROCEDURE FEE

Received a sum of Rs. 5000/- (Rupees) 19306

on account of 1st / subsequent visit consultation fee from, CNE

Iftikhar Hussain referred to
Lt Col Spec

Patient's Address: (PCR for covid-19) (Mudblasin)

Adv by Lt Col Farooq Contact No 0333-8007480

CMH Nowshera Cantt

Bic 7511
8192

(Account Clerk)

Dated: 05-04-21

(27)

20

Department of Pathology
Combined Military Hospital
Nowshera Cantt
Exchange 0823611908
Civil Exchange 0913510030

Entered By: Habib Ullah
Entered At: 06/04/2021
Print Date: 06/04/2021

Miscellaneous virology

COVID-19

Positive

Opinion: There is molecular evidence of SARS-CoV-2 by RT-PCR in the sample provided. Please correlate clinically.

Comment: The test has been performed by RNA extraction with FAVORGEN Biotech Corp. (Taiwan) and Amplification by ARGENE RT-PCR assay detection Kit for SARS-CoV-2 using Cepheid Smart Cycler 1600 System.

Report Authorized By: Maj. Dr Nargis Sabir, Classified Microbiologist. (06/04/21 08:26)

Note: This is a computer generated report.

ATTESTED
to be true copy.
Advocate
05/7/21

28

Department of Pathology
Combined Military Hospital
Rawshera Cantt
Phone: 0923610958
Exchange: 0923610030

Entered By: Habib Ullah Latif
Entered At: 05/04/2021
Print Date: 10/06/2021

Lab ID: 21019306
Patient: P- 7165/7162.Mr Iftikhar Hussain (M) (65 Y)

Miscellaneous virology

COVID-19

✓ **Positive** *

Opinion: There is molecular evidence of SARS-CoV-2 by RT-PCR in the sample provided. Please correlate clinically.

Comment: The test has been performed by RNA extraction with FAVORGEN Biotech Corp. (Taiwan) and Amplification by ARGENE RT-PCR assay detection Kit for SARS -Cov 2 using Cepheid Smart Cycler.1600 System.

Report Authorized By: Maj.Dr Nargis Sabir, Classified Microbiologist. (06/04/21 08:26)

21

Department of Pathology
Combined Military Hospital
Rawshera Cantt
Exchange 0575610013
Civil Exchange 0923 10033

Entered By Habib Ullah
Entered At 5/04/2021
Print Date 09/04/2021

Lab No: 19305
Patient: 687182 Mr. Iftikhar Hussain (M) 65 Y

Blood Complete Picture

Blood Counts

TLC	46	40 - 10.0 x 10 ⁹ /L
RBC	5.30	4.50 - 6.50 x 10 ¹² /L
Haemoglobin	15.3	13.0 - 17.0 g/dL
PCV	0.46	0.40 - 0.54
MCV	87.4	76.0 - 96.0 fL
MCH	28.9	26.0 - 32.0 pg
MCHC	33.0	30 - 36 g/dL
Platelet Count	173	150 - 400 x 10 ⁹ /L

Differential Leucocyte Count

Neutrophils	79	40 - 70 %
Lymphocytes	13	15 - 40 %
Monocytes	05	2 - 10 %
Eosinophils	03	1 - 6 %

Report Authorized By: Maj. Dr. Nargis Sabir, Classified Microbiologist. (06/04/21 08:56)

ATTESTED

to be true copy

[Signature]
Advocate
05/7/2021

30

18-A

COVID-19 Hospital
(Peshawar-KPK)
Patient Discharge Card

Patient Name: TETAKHAR S/o, D/o, W/o: Tenzan

CNIC: 7201-2479145-7 Contact # (mandatory): 0315-9716863

Address: Peshawar

Age: 60 yrs Gender: F. Male Blood Group: _____

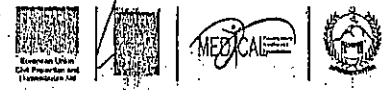
Ref #: _____ Date of Admission: 06/04/21 Discharge Date: 09/04/21

CRP #: 14853 OPD #: 1077 IPD #: _____

PROVISIONAL DIAGNOSIS Covid-19 Positive

FINAL DIAGNOSIS _____

Consultant Name: Dr. Fazal Akbar Signature: [Signature]



ATTESTED
to be True Copy
[Signature]
Advocate
05/7/21

(2)

Chief Complaints

Sci B. Loss of vision

Treatment at Hospital

- inj Ceftriaxone 9 6M No
- inj Heparin Saccate 70-50
- inj Dexam 1.55cc 1/0 OD
- Tab. Ivermectin per 3 days
- Tab. Cefcon .910
- Tab. Simbax 2 P/O OD
- Cap. Combivir TDS
- 141 indroP
- inf. Vit K1 500ml
- insulin 7c/3c M-24
N-14
- inj. Mette bioa 1/0 OD

(19-A)

ATTACHED

to be true copy

[Signature]
 Advocate
 05/7/2021

10/10

19

10

Investigations

All BLD's

Procedure Notes (if any)

Treatment at Home

① Tab Amoxiclav 675mg → 5 days
111

② Tab Dettacotta 5+5 → E1
4+4 → DL 2+2 → PL
3+3 → 0 1+1
→ 000 → 2 PSI

③ Tab Sorbay 2 - 1 month
(10)

④ Tab Ceeon (1+1) → 15 days

⑤ Tab Riscik 40mg → 14 days
1.4

⑥ Tab - Xcept 10mg → 1 month
1/1/17 (1)

⑦ inj insulin 70/30 M 20/10
E 1/10

Follow up

5/12 (10) 10/10 (1/1/17)

1/1

33

The director Conservator,
Wild life, Peshawar zoo
KPK Peshawar.

Sub

Reply of chargesheet in statement of
allegation issued against Mr. Majid
Khattak (Ex-Maj.) Peshawar Zoo,
Dated 16/12/22

that the Petition submits Parawise reply
of the allegations as Under;

1: As to Para No. 1 I would humbly submit
that: I have perform my duties according to
the Orders of High UFs I have never
violated any orders of the superior authority
Moreover, the Petitioners remained discipline
the entire allegation in the alleged
Para is totally wrong, baseless & without
Proof, hence the same may ~~not~~ be
Kindly Consider against the Petitioners.

(34)

2: in reply to Para No. 2 it is humbly
submitted I use to remain active &
worked hard as a Maj. Besides
Person, Moreover the allegation in the
Para as already stated in the piece
Para

the Petitioners have never violated the order of high ups & remains obedient.

(2)

3: In reply of Para No. 3 It is humbly submitted

as I already stated that I am a Post Person & have work load without

Use to Demand Referring comfort zone of the sun during

Under the duty hours, hence, the allegation may kindly be rejected in favor of Petitioners

4: In reply to Para No. 4 It is submitted

that unfortunately in year 2020 the Petitioners ~~appointment~~ & then his father fell ill & dates on the Petitioners father was diagnosed Covid-19 due to which he quarantined himself with his father, therefore the Petitioners could not attend the office & perform his duties in those days. (copy of medical script is annexed)

5: In reply to Para No. 5 It is submitted that I am a Post Person & work in dept. as

Mail. It is astonishing that how a Post Person being could approach Politically high ups, for

Respecting the authority, therefore the entire allegation are baseless, wrong & may kindly be rejected in favor of Petitioners.

Arguments:

- Pages number
- appointment order
- medical scrubs and AP/Resection - 10
- Inquiry - 22 - charge by State
- Statement of allegations - 25
- Slow case
- Reply - 27
- Removal order
- Departmental appeal = 29 = 30
- Departmental appeal
- and Departmental appeal

3

Q: In reply to Para No 6 It is submitted that the entire Para is wrong as there is no single statement of any person with whom I have gossips while performing my duties, hence the Para may kindly be rejected in favor of Petitioner.

(36)

7: In reply to Para No. 7 It is submitted that Misbehave with wild life watcher & I have never perform all tasks given by high up single statement of wild life & I have myself in no matter that I have Misbehave with them hence the Para may kindly be rejected in favor of Petitioner.



in reply to Para No-8 It
is submitted that I have performed
my duties according to the orders
I was never involved in the
domestic issues, however being human
I was facing severe diseases as
well as caring my father being
quarantine with him during Covid-19
for which I have taken proper leaves
from high ups accordingly, Moreover the
entire allegation in charge sheet is
baseless without circumstantial
evidence based on biased presumption
assumptions, hence, the entire
allegation may kindly be rejected -

It is therefore most humbly
Prayed that my Para wise reply
may kindly be considered & reinstate
the Petition along with back benefit
admissible by law being the only source
of income for entire family of
the Petitioner

Petitioner
Majid Khattak
(Ex-Mali)
Peshawar Zoo

(37)

(Annex - (XII))


	<p>OFFICE OF THE DIVISIONAL FOREST OFFICER WILDLIFE COORDINATION & EXTENSION "MERGED AREAS INTEGRATED DEVELOPMENT FORESTRY SECTOR PROJECT UNDER TRIBAL DECADE STRATEGY (WILDLIFE CONSERVATION AND DEVELOPMENT)" STREET NO. 03 ABBSHAR COLONY NEAR MASJID USMAN KABABYAN CHOCK WARSACK ROAD, PESHAWAR. E-mail ID: pdmergedarea@gmail.com</p>	
No. 5173 W/L (AIP)		Dated Peshawar the 26/12/2022

To

The Director/Conservator Wildlife
Peshawar Zoo,
Peshawar.

Subject REPLY TO THE CHARGE SHEET AND PERSONAL HEARING

In continuation of this office letter No. 5160/WL (AIP) dated 16/12/2022, it is requested to kindly depute a well conversant officer of your office to attend office of the undersigned along with all relevant record in connection with personal hearing of Mr. Majid Khattak (Ex-Mali) Peshawar Zoo, at 10:00 am on 27/12/2022.


26/12/22
Zia ur Rahman
Coordination & Extension
Divisional Forest Officer Wildlife
MA Forestry Sector Project
(Wildlife Component)
Peshawar

38

Annexo - (XIII)

5



OFFICE OF THE ADMINISTRATION OFFICER
PESHAWAR ZOO



Phone: 091-5610011

Email: zoocare11@gmail.com

No. 240/AO-Zoo

Dated Peshawar zoo the 04/05/2019

To,

The Deputy Director,
Peshawar Zoo

Subject: LACK OF INTERSET IN DUTY AND WEEK PERFORMANCE

Respected sir,

I am writing this letter to inform you that Mr. Majid Khattak (Mali Peshawar Zoo) is not taking interest in performing his official duties. The administration is not satisfied with his performance. His attendance is not satisfactory as he avail leave without proper sanction of the competent authority. In recent pandemic created by COVID-19, all staff of Peshawar Zoo is provided relaxation in duty timings. He was also provided with the same and allowed one month leave as he was suffering from severe chest infection. The said Mali either keeps wandering around or lying in guard room without completing any assigned tasks. He was verbally warned a few times and explanations have been called several times (Copies enclosed) but he failed to follow the discipline. His misbehavior with all beat watchers and admin officer is a point of concern. He is habitual defaulter and medically unfit. He lack experience in his relevant field, his excuses regarding duty are beyond understanding.

You respected sir are well aware of the fact that he is in his probation period, he will create problems for the whole administration in future, so it is requested kindly to take strict legal action against the said Mali. Previous Admin Officers also has highlighted his lack of interest towards his duty and his behavior in their respective letters which are attached herewith. It is further requested to terminate the said Mali without any further loss to Government assets. Please.

Administration Officer
Peshawar Zoo

(39)

No. 241-42/AO-Zoo

Dated 04/05/2019


Copy Forwarded to

- 1) Director Peshawar Zoo for information and N/A
- 2) Personal file

Seen by 7/5/2022
D/Sw

Administration Officer
Peshawar Zoo

Annex - III
67

	OFFICE OF THE DEPUTY DIRECTOR/DFO, PESHAWAR ZOO, PESHAWAR
	Pakistan Forest Institute, Govt. of Khyber Pakhtunkhwa Peshawar Phone: 091-9221195, Email: zoonpeshawar@gmail.com
No. 1013	Dated: 23/09/2019

To,

Mr. Muhammad Majid (Mali)

Subject: LACK OF INTEREST TOWARDS YOUR OFFICIAL WORK


It is stated that the undersign is keenly observing you from the very first day of your joining at Peshawar Zoo that you are not taking interest in your official duty. When the undersigned is on routine visit, found you many time in gossip with others or using mobile or taking rest.

Therefore, these indifferent behaviors towards your official duty are greatly undermined by the undersigned and you are hereby directed to concentrate on your official work otherwise strict disciplinary action will be initiated against you under the Efficiency and Disciplinary rules-2011.

Deputy Director Peshawar
Zoo, Peshawar

SNo. 1013 / Zoo
Copy to,



1. Director/Conservator Wildlife Peshawar Zoo for favor of information.
2. Admin. Officer/S/DWO Wildlife Peshawar Zoo for favor of information.


 Deputy Director Peshawar
 Zoo, Peshawar

40

Amir

63


	OFFICE OF THE ADMINISTRATION OFFICER PESHAWAR ZOO	
Phone: 091-5610011 Email: zoocare11@gmail.com		
No. 69/AO-Zoo		Dated Peshawar Zoo the 01/10/2019

بجائے

مستند جنک
مالی، پشاور جزیرا گھر

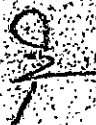
عنوان: سرکاری فرائض میں غفلت

آپ کو اس سے پہلے بھی زیر دستخطی کے دفتر سے مراسلہ نمبر 43/2019 بتاریخ 14/09/2019 ہدایات دی گئی تھیں اور خبردار کیا گیا تھا کہ ڈیوٹی کے دوران اپنا اور دوسرے سٹاف کا وقت ضائع کرنے کے بجائے اپنے کام پر توجہ دیا کریں۔ لیکن حسب عادت آپ کام کے بجائے ادھر ادھر گھومنے، گپ شب اور سایوں کے نیچے اور مختلف بہانوں سے ٹیمپل کرنے پائے گئے۔ زبانی اور تحریری ہدایات کا آپ پر کوئی اثر نہیں ہوتا۔ آپ کی وجہ سے جزیرا گھر انتظامیہ سخت پریشانی میں ہے کیونکہ آپ کے اس رویے اور عمل کی وجہ سے باقی عملہ بھی متاثر ہو رہا ہے۔ بار بار تنبیہ کے باوجود آپ نے اپنے معاملات ٹھیک نہیں کیئے اور نہ اب تک اپنے آپ میں کوئی خاطر خواہ تبدیلی لیکر آئے۔ ہدایات کو ہدایات ہی سمجھ جاتی ہیں کہ آپ اپنے معاملات درست کریں۔ ادھر ادھر فضول باتوں، سستی، غیر ضروری گھومنے پھرنے میں وقت ضائع کرنے کے بجائے اپنے کام پر توجہ دیں۔ کیونکہ آپ کا یہ رویہ اور عمل آپ کو سرکاری نوکری سے نکال بھی سکتا ہے۔


ایڈمنسٹریٹو آفیسر
پشاور جزیرا گھر

نمبر: 69/AO-Zoo

کاپی برائے اطلاع و ضروری عمل
ڈپٹی ڈائریکٹر پشاور جزیرا گھر کو ارسال کی گئی۔


ایڈمنسٹریٹو آفیسر
پشاور جزیرا گھر

afc

(4)



OFFICE OF THE DEPUTY DIRECTOR/DFO
PESHAWAR ZOO

Ph# 091-9221195

Email: ddirector66@gmail.com



No. 6975/DD/Zoo

Dated Peshawar the 02/01/2020

بجانب:

ماجد خٹک، مالی
اسد مسیح سویپر
نعمان خان سویپر

نوید خان / وائلڈ لائف واچر
انیل مسیح سویپر
آصف مسیح سویپر
سکندر خان سکیورٹی گارڈ

عنوان: دیر سے آمد وقت سے پہلے جانا اور کمزور کارکردگی

حوالہ نمبر: 135/A0-Zoo dated 02/01/2020

اوپر ظاہر کیے گئے پشاور چڑیا گھر کے سٹاف کو خبردار کیا جاتا ہے کہ سرکاری ڈیوٹی میں وقت کی پابندی کا سختی سے خیال رکھا کریں۔ دیر سے آنے اور وقت سے پہلے چھٹی کرنے کو بالکل بھی برداشت نہیں کیا جائے گا۔ لہذا آپ سب کو اور باقی سٹاف کو خبردار کیا جاتا ہے کہ آئندہ دینے گئے ڈیوٹی شیڈول پہ عمل نہ کرنے، دیر سے آنے اور وقت سے پہلے چلے جانے کو غیر حاضر تصور کیا جائیگا اور اُس کی اُس دن کی تنخواہ کاٹ دی جائیگی۔ اس کے علاوہ غفلت کرنے والوں کے ساتھ قانونی کارروائی کی جائیگی اور اُن کی کارکردگی سالانہ رپورٹ میں لکھی جائیگی۔

ڈپٹی ڈائریکٹر، پشاور چڑیا گھر

نمبر: 7677 تاریخ 02/01/2020

کاپی برائے اطلاع و ضروری عمل

1- ڈائریکٹر پشاور چڑیا گھر



2- ایڈمنسٹریشن آفیسر پشاور چڑیا گھر

ڈپٹی ڈائریکٹر، پشاور چڑیا گھر

o/c

42

81

	OFFICE OF THE ADMINISTRATION OFFICER PESHAWAR ZOO	
	Phone: 091-5610011 Email: zoocare11@gmail.com	
No. <u>244</u> /AO-Zoo		Dated Peshawar zoo the 10/08/2020

To,

The Deputy Director,
Peshawar Zoo.

Subject: LEAVE WITHOUT PROPER SANCTION

Respected sir,

It is submitted that the following staff of Peshawar Zoo were absent from their official duties on the mentioned days without informing the undersigned. Their willful absence without prior permission of concerned official is becoming headache for Zoo administration.

Therefore it is requested to treat them as without pay for these willful absences and negligencé, please.

S.No	Name	Designation	Total without pay
1	Mr.Nouman	Sweepers	03 days (19 July and 5,6 august 2020)
2	Mr.Shahkar shahid	Animal keepers	03 days (6,15 and 24 July 2020)
3	Mr.Majid khatak	Mali	04 days (3,10,19 and 28 July 2020)

[Signature]
 Administration Officer
 Peshawar Zoo

No. 245 /AO-Zoo Dated 10/08/2020
Veterinary Officer for information

[Signature]
 Administration Officer
 Peshawar Zoo

43



OFFICE OF THE ADMINISTRATION OFFICER
PESHAWAR ZOO



Phone: 091-5610011

Email: zoocare11@gmail.com

No. 303 /AO-Zoo

Dated Peshawar zoo the 17/08/2020

To,

The Deputy Director,
Peshawar Zoo.

Subject: MISBEHAVIOR OF MAJID KHATAK (MALI) WITH ADMIN OFFICER

Respected sir,

It is submitted that Mr. Majid khatak (Mali Peshawar zoo) is habitual defaulter and liar. He is providing irrelevant and fake reports for his illness. Recently he provided a medical report which was signed by a trainee at KTH, the undersigned refused to allow him leave for one week but he continued willful absence for 04 days. He is medically unfit for the job. He is suspended due to his behavior and lack of interest in duty and inquiry against him already has been started but he is still not showing any improvement in his performance. His reasoning and misbehavior with all beat watchers and admin officer is a point of concern. He refused to perform his official duties and misbehaved with Admin Officer.

He keeps providing medical reports regarding his illness which is from the start of his career. In the last 10 months he is unable to recover from thousands of injuries, surgeries and excuses. He must be removed from the service as soon as possible as he is ruining the administration of Peshawar Zoo with his casual behavior. Therefore you are requested kindly to finalize the inquiry decision and take legal action for such negligence, misbehavior and lack of interest in official duty, Please.

Administration Officer
Peshawar Zoo

No. 207/AO-Zoo Dated 17/08/2020
Copy for information and necessary action to Director Peshawar Zoo.

Administration Officer
Peshawar Zoo

D/20



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OFFICE ORDER NO. 04 DATED PESHAWAR THE 13/08/2020
ISSUED BY MR. ISHTIAQ ULLAH DEPUTY DIRECTOR/DFO WILDLIFE
PESHAWAR ZOO

As per report submitted by administration officer vide letter No. 294/Ao/zoo dated 10/08/2020, the following staff is hereby treated as leave without pay as per detail given below;

S.No	Name	Designation	Days treated as without pay
01	Mr. Nauman khan	Sweeper	03 days (19 July, 05, 06 August 2020)
02	Mr. Shahkar Shahid	Animal Keeper	03 days (06, 15 & 24 July 2020)
03	Mr. Majid Khattak	Mali	04 days (3, 10, 19 & 28 July 2020)

You all are directed to ensure your presence as per duty schedule and avoid willful absent in your own interest otherwise disciplinary action will be initiated against you under Khyber Pakhtunkhwa Government servants (E&D Rules), 2011.

(ISHTIAQ ULLAH)
Deputy Director/DFO
Peshawar Zoo

No. 23-28 /DD/Zoo

Copy forwarded to;

- ✓ 1. Director Peshawar Zoo for information please.
2. Administration Officer for information w.r.t his letter No. 294/Ao/zoo dated 10/08/2020.
3. Accountant Peshawar Zoo for information and necessary action.
4. Mr. Nauman Khan, Sweeper Peshawar Zoo, Mr. Shahkar Shahid, Animal Keeper Peshawar zoo and Mr. Majid Khattak Mali Peshawar Zoo.

Handwritten signature and date: 13/08/2020

Handwritten signature
Deputy Director/DFO
Peshawar Zoo

45

01220



OFFICE OF THE DEPUTY DIRECTOR/DFO
WILDLIFE PESHAWAR ZOO, PESHAWAR

Ph# 091-9221195

Email: ddirector66@gmail.com



No. 49 /Zoo

Dated Peshawar the 28 / 02 / 2020

To,

Director/Conservator Wildlife
Peshawar Zoo

Subject: WEAK/NIL PERFORMANCE AND EXTENSION OF PROBATION
PERIOD THEREOF

It is submitted that the following staff of Peshawar zoo has shown either weak or zero performance besides disobedience and misconduct on various occasions. They have been frequently reported and warned for their lack of interest in performing official duties, non submissive attitude, violating duty schedule and absenteeism at their will. They could not improve/mend their ways and means and are a source of constant inconvenience for the zoo administration since their induction to the government service. Detail of staff with official record is as follow;

S#	Name	Designation	Particulars
01	Ibad ur Rehman	Animal Keeper	No. 82/Ao/zoo dated 27/10/2019 No. 221/Ao/zoo dated 02/03/2020 No. 222/Vo/zoo dated 20/03/2020 No. 218/Vo/zoo dated 16/03/2020 No. 299/Ao/zoo dated 14/08/2020 No. 300/Ao/zoo dated 14/08/2020 No. 313/Ao/zoo dated 24/08/2020 No. 26/Vo/zoo dated 31/07/2020 No. 12/Vo/zoo dated 23/07/2020 No. 321/Vo/zoo dated 30/06/2020 No. 126/Vo/zoo dated 20/09/2019 No. 147/Vo/zoo dated 11/01/2020 No. 217/Vo/zoo dated 06/03/2020 No. 221/Vo/zoo dated 20/03/2020 No. 222/Vo/zoo dated 20/03/2020 No. 292/Vo/zoo dated 27/05/2020 No. 302/Vo/zoo dated 07/01/2020 No. 230/Ao/zoo dated 27/04/2020 No. 148/Ao/zoo dated 11/01/2020
	Shahkar Shahid	Animal Keeper	No. 82/Ao/zoo dated 27/10/2019 No. 211/Ao/zoo dated 08/03/2020 No. 294/Ao/zoo dated 10/08/2020 No. 299/Ao/zoo dated 14/08/2020 No. 300/Ao/zoo dated 14/08/2020 No. 313/Ao/zoo dated 24/08/2020 No. 213/Ao/zoo dated 06/03/2020 No. 12/Vo/zoo dated 23/07/2020 No. 108/Vo/zoo dated 03/12/2019 No. 117/Vo/zoo dated 18/12/2019 No. 210/Vo/zoo dated 06/03/2020 No. 217/Vo/zoo dated 16/03/2020 No. 279/Vo/zoo dated 19/05/2020 No. 118/Vo/zoo dated 18/12/2019 No. 109/Vo/zoo dated 03/12/2019
	M. Aamir	Animal Keeper	No. 308/Ao/zoo dated 23/08/2020 No. 313/Ao/zoo dated 24/08/2020 No. 35/Vo/zoo dated 24/08/2020 No. 213/Vo/zoo dated 06/03/2020 No. 279/Vo/zoo dated 19/05/2020 No. 310/Vo/zoo dated 12/06/2020 No. 33/Vo/zoo dated 18/08/2020 No. 12/Vo/zoo dated 23/07/2020 No. 210/Vo/zoo dated 12/06/2020 OO No. 07/DD dated 19/05/2020
	Sadaat Ali	Animal Keeper	No. 168/Ao/zoo dated 29/01/2020 No. 230/Ao/zoo dated 27/04/2020 No. 300/Ao/zoo dated 14/08/2020 No. 313/Ao/zoo dated 24/08/2020 No. 15/Vo/zoo dated 26/07/2020 No. 12/Vo/zoo dated 23/07/2020 No. 179/Vo/zoo dated 29/01/2020
	Nauman	Sweeper	No. 72/Ao/zoo dated 08/10/2019 No. 110/Ao/zoo dated 10/12/2019 No. 135/Ao/zoo dated 02/01/2020 No. 136/Ao/zoo dated 03/01/2020 No. 168/Ao/zoo dated 29/01/2020 No. 200/Ao/zoo dated 20/02/2020 No. 296/Ao/zoo dated 10/08/2020 No. 299/Ao/zoo dated 14/08/2020 No. 300/Ao/zoo dated 14/08/2020 No. 313/Ao/zoo dated 24/08/2020 No. 253/Ao/zoo dated 28/05/2020 No. 294/Ao/zoo dated 10/08/2020
	Majid Khattak	Maali	No. 135/Ao/zoo dated 02/01/2020 No. 146/Ao/zoo dated 14/01/2020 No. 180/Ao/zoo dated 03/01/2020

*D.A. L.M.
Issue order
11/11/2020*

(46)



OFFICE OF THE
DIRECTOR/CONSERVATOR WILDLIFE
PESHAWAR ZOO, PESHAWAR

Phone: 091-9221195, Email: zoopeshawar@gmail.com



No. 849 /Zoo

Dated Peshawar 15-10-2020

To

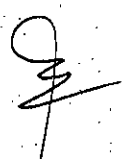
Mr. Majid Khattak
Mali, Peshawar Zoo

Subject

LAST WARNING

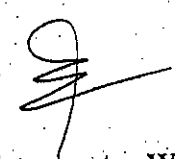
You are warned several times regarding your willful absence. But you did not mend your ways and means & continue to remain absent at will. Your negligence and lack of interest is source of concern for the zoo administration.

You are therefore finally warned to shun such attitude and perform duty as per duty schedule and instruction from your higher ups otherwise you will be terminated from the government services in case of failure in complying orders from your immediate officers. No leniency will be shown if your negligence, absentee and misconduct reported in future.




Director/Conservator Wildlife
Peshawar Zoo *ou*

No. 850 /Zoo

Copy forwarded to Admin: Officer, Peshawar Zoo for information, please.


Director/Conservator Wildlife
Peshawar Zoo *ou*

(47)

	OFFICE OF THE DIRECTOR/CONSERVATOR WILDLIFE PESHAWAR ZOO, PESHAWAR	
	Ph# 091-7256677 Email: zoopeshawar@gmail.com	
No. <u>1154</u> /Zoo		Dated Peshawar the <u>23</u> / <u>11</u> /2020

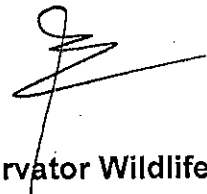
To,

Mr. Majid Khattak
Maali, Peshawar Zoo

Subject: LAST WARNING


Reference: Your reply to the charge sheet vide this office letter No. 1043/zoo dated 02/11/2020.

You are warned for the last time to avoid inefficiency, misconduct and willful absenteeism and ensure duty as per notified schedule in your own interest otherwise you will be removed from government service under E&D Rules 2011 without any further notice.


Director/Conservator Wildlife
Peshawar Zoo

No. 1155 /Zoo

Copy for information and necessary action forwarded to Administration Officer Peshawar Zoo. You are directed to keep strict vigilance over him and report any negligence on his part positively.


Majid Director/Conservator Wildlife
23-11-2020 Peshawar Zoo

(48)

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OFFICE OF THE ADMINISTRATION OFFICER
PESHAWAR ZOO



Phone: 091-5610011 Email: zoocare11@gmail.com

No. 465/MZoo

Dated Peshawar Zoo the 05/03/2021

To,
The Director/Conservator,
Peshawar Zoo.

754
8-3-2021

Subject: PERFORMANCE OF MR. MAJID KHATTAK (GARDNER, PESHAWAR ZOO)

Dear Sir,
It is to inform your good self that the undersigned himself was observing the performance of the said Gardner for the last two weeks. Earlier, the Watchers of Peshawar Zoo were directed to keep close eye on the activities of Mr. Majid khattak. According to the observations and written statements (Attached herewith) of the concern watchers, it was then decided by the undersigned to observe his performance personally. The said Mali was given many tasks but he failed to complete any of them. It was then decided to assign another Mali as a helper for a day or two to help him out in completion of all his remaining works. This sympathy was shown by the undersigned just because the said Mali was not feeling well and he had issues regarding his health in recent past.

It is further submitted that despite of the sympathy, performance of the said Mali is getting weaker day by day. The undersigned made a collage of what he had discovered in the last few days. It is stated with grave concern that podium, being a major sight of attraction for all the visitors is treated like this. The said Mali was warned hundred times verbally and in writing to abstain from such lack of interest in his duties but he failed to improve. He spends most of his time in the tube well room making tea and having gossips with the security guards. This behavior of Mr. Majid Khattak is ruining the reputation of Peshawar Zoo. All other Gardeners of Peshawar Zoo are working harder for the beauty of Zoo but the said Mali is taking his duties and orders of the higher ups very lightly. He normally argues with the Watchers of his concern beat which clearly reflects insubordination and gross negligence of duties. He is making himself liable for necessary action.

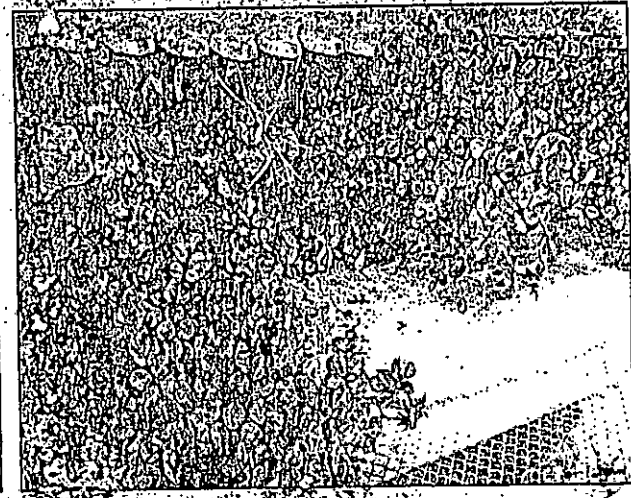
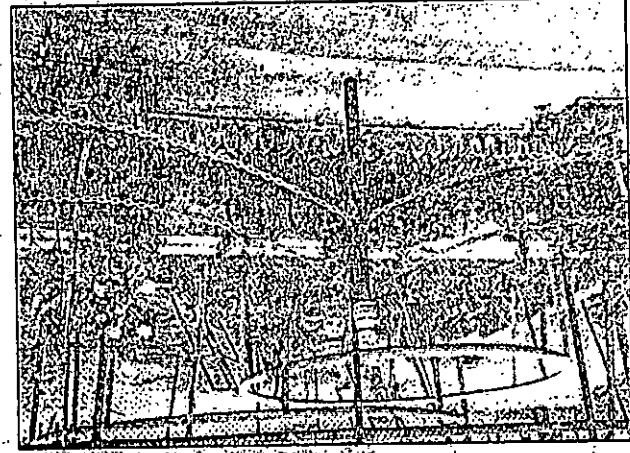
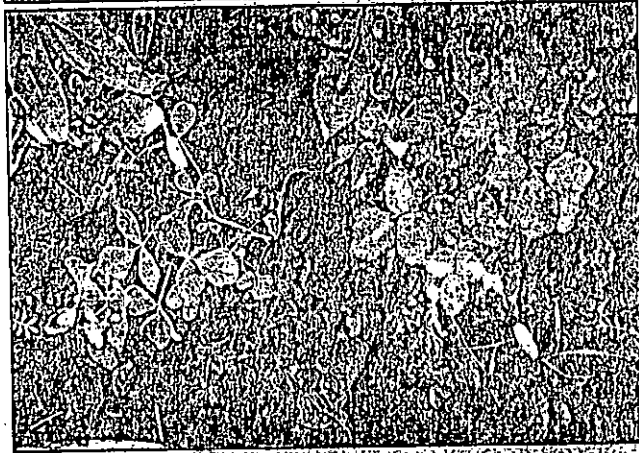
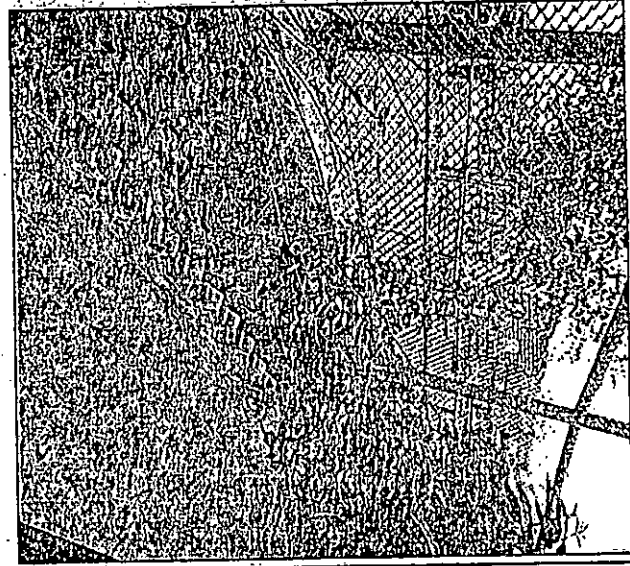
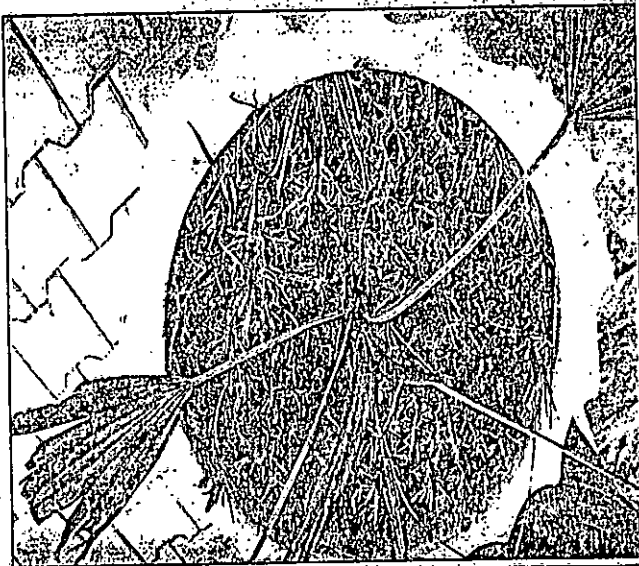
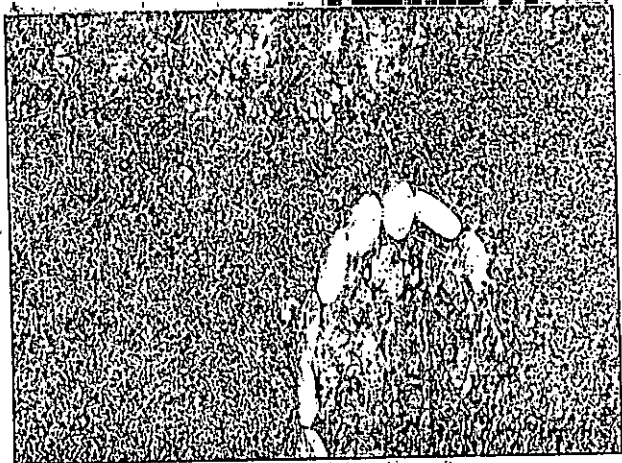
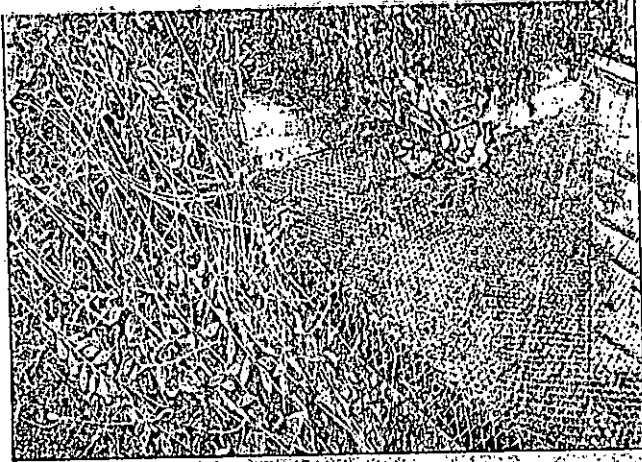
You are therefore requested to take strict legal action for such negligence and lack of interest in official duty, Please.

Handwritten notes:
1st / 2nd / 3rd days
all day
5 mins
file

Signature:
Administrative Officer
Peshawar Zoo

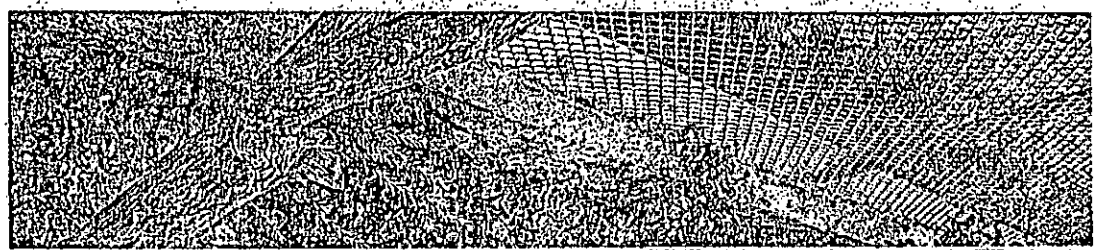
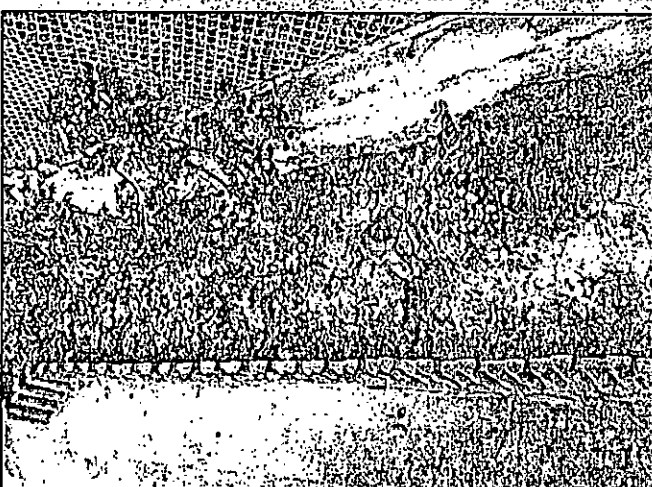
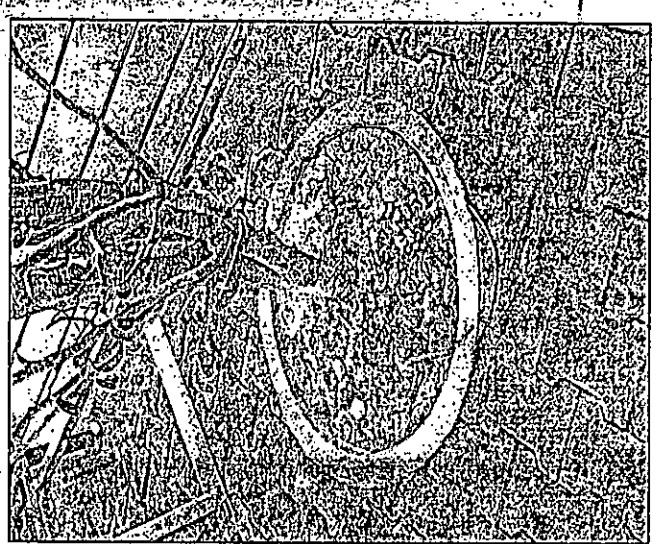
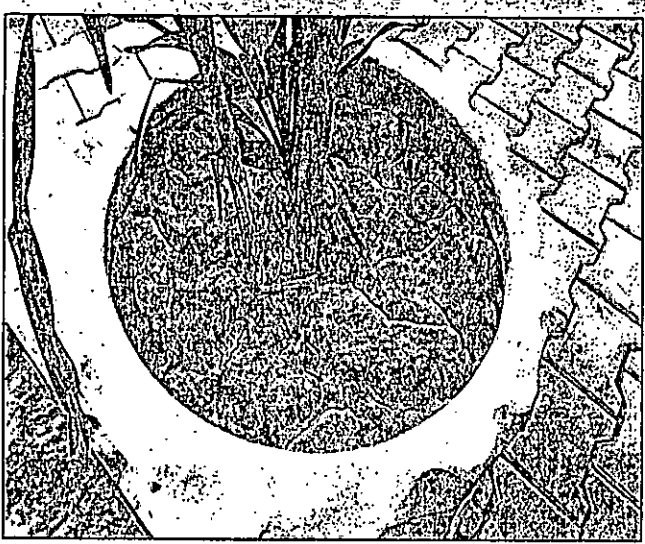
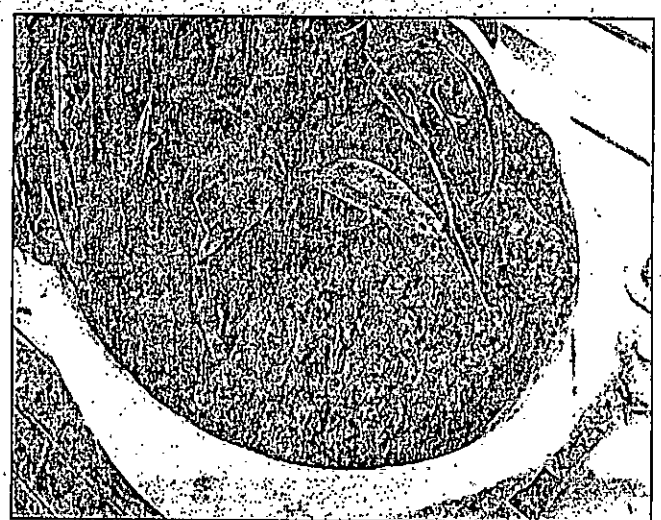
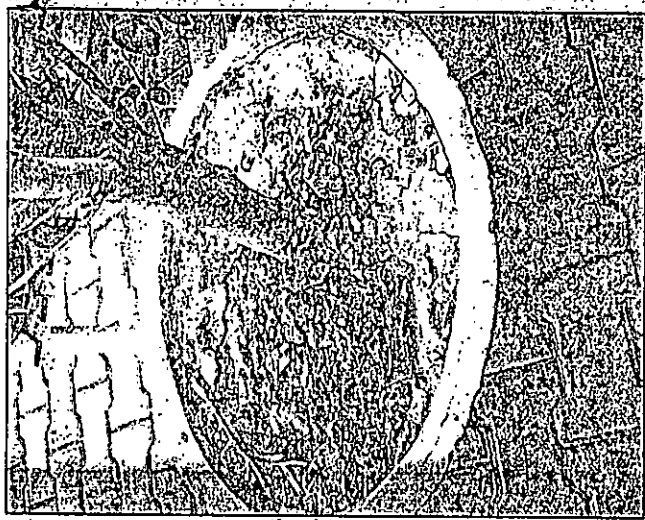
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WESTERN FLOWER BED

135



(S)

	OFFICE OF THE ADMINISTRATION OFFICER PESHAWAR ZOO	
	Phone: 091-5610011 Email: zoocare11@gmail.com	
No. /AOZoo	Dated Peshawar Zoo the 08/04/2021	

بجانب :

ماجد ٹنک (مالی) پشاور چڑیا گھر

Office of the PD/CWL
Peshawar Zoo, Peshawar.

Diary No. 859

Dated 13-04-2021

وضاحت طلبی

پچھلے کئی عرصے سے زبردست تھپی اور بیٹ واچرز آپ کی کارکردگی پر نظر رکھے ہوئے ہیں لیکن کوئی بھی آپ کے کارکردگی سے مطمئن نہیں ہیں۔ جو کام بھی آپ کے حوالے کیا جائے آپ اسے وقت پر پورا نہیں کرتے۔ آپ کی بیماری کی وجہ انتظامیہ نے آپ کے ساتھ یہ تعاون کیا کہ آپ کو سخت کام سے دور رکھا اور آپ کی ڈیوٹی مین گیٹ پر لگائی جہاں پر کام دوسرے جگہوں کی نسبت کم ہوتا ہے۔ اس کے باوجود بھی آپ کی کارکردگی غیر تسلی بخش ہے اور اس کے ساتھ ساتھ آپ کی حاضری بھی غیر تسلی بخش ہے آپ پچھلے دو دنوں سے بغیر بتائے غیر حاضر ہے۔ آپ کی یہ غیر حاضریاں اور کاموں میں غفلت زبردست تھپی کے لیے درد سر بن چکا ہے۔ وقت بے وقت چھٹی بیٹ واچرز کے ساتھ تکرار اور ایڈمن آفسر کی بات نہ ماننے پر آپ سے وضاحت طلبی کی جاتی ہے۔ لہذا آپ اپنا وضاحتی بیان تین دن کے اندر اندر جمع کروادیں

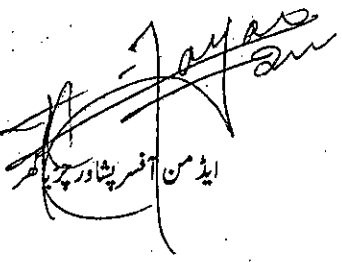
ایڈمن آفسر پشاور چڑیا گھر

No. 1910/200

dt. 13/04/2021

حوالہ نمبر 484/Ad/20

کاپی برائے قانونی کارروائی ڈائریکٹر پشاور چڑیا گھر ✓


 ایڈمن آفسر پشاور چڑیا گھر

A/O:

He has exhausted his way
all chances to mend his
and means and therefore
no leniency. He is named
for Govt. services now onwards

13/4/2021

(52)

Annex - XIII

47

	OFFICE OF THE DEPUTY DIRECTOR/DFO PESHAWAR ZOO		
	Ph#: 091-9221195	Email: ddirector66@gmail.com	
No: 90	DD/Zoo	Dated Peshawar the 06/02/2020	

To: The Director/Conservator Wildlife
Peshawar zoo

Subject: WILLFUL/UNOFFICIAL ATTENDANCE RECORD OF MR. MAJID KHATAK,
GARDENER, PESHAWAR ZOO

Reference: Admin office letter No. 180/AO-Zoo dated: 03/02/2020

It is stated with concern that Mr. Majid Khattak, Gardener in Peshawar zoo is a habitual defaulter in attendance and duty performance. He has become liability for zoo administration. He has to regularly be directed for shouldering his assigned responsibilities as he used to stay inactive unless and until directed by the concerned officer/official.

His attendance record in December 2019 and January 2020 is very poor which has become a norm for the zoo administration.

Your office is requested to kindly take necessary measures against him in the best interests of Zoo management and public at large please.

Deputy Director/DFO Wildlife
Peshawar Zoo

No: / DD/Zoo

Copy for information forwarded to administration office Peshawar zoo.

Deputy Director/DFO Wildlife
Peshawar Zoo

302/2020
14/2/2020

copy of phone

D/20

53

Amma - 84

49

The D. Director
Peshawar zoo Peshawar

Subject : Application of Explanation

Respectfully

It is state that I explain my reason that I am far from my duty location I am trying for coming early and I will not come late again



Sincerly

Majid
Majid khattak
Disignation : Mall
Peshawar zoo

(54)

Annex - XI

49

	OFFICE OF THE DEPUTY DIRECTOR/DFO PESHAWAR ZOO		
	No. /DD/Zoo	Ph# 091-9224195	
Dated Peshawar the 03/02/2020			

57

بجانب
 رقم اینڈر اینڈنگ اسسٹنٹ
 ماسٹر ٹیک مانی
 واحد سٹیشن اینڈکریشن

عنوان: کمپوز حاضری ریکارڈ اور وضاحتی جواب
 حوالہ نمبر: 180/A0-Zoo dated 03/02/2020

ایڈمنسٹریشن آفیسر کی رپورٹ کے مطابق مندرجہ بالا اسٹاف کا حاضری ریکارڈ تعلق بخش نہیں ہے۔ آپ سب کو ہدایات دی جاتی ہیں کہ اپنی حاضری کے مقررہ اوقات کو یقینی بنائیں۔
 اسی سلسلے میں آپ سب کو خبردار کیا جاتا ہے کہ تین دن کے اندر اپنا توضاحتی جواب دفتر ہذا میں جمع کریں کہ کیوں آپ کے خلاف قانونی کارروائی نہ کی جائے۔ دوبارہ خلاف ورزی کرنے والوں کی تنخواہ حاضری ریکارڈ کے حساب سے گات دی جائے گی۔

ڈپٹی ڈائریکٹر، پشاور جڑیا گھر

تعمیر: 97-98
 کاغذ برائے اطلاع و ضروری عمل

- 1- ڈائریکٹر پشاور جڑیا گھر
- 2- ایڈمنسٹریشن آفیسر پشاور جڑیا گھر





ڈپٹی ڈائریکٹر، پشاور جڑیا گھر

55

Annex-VIII

57

	OFFICE OF THE ADMINISTRATION OFFICER PESHAWAR ZOO	
Phone: 091-5610011		Email: Zooadmin1@gmail.com
No. 146/AO/Zoo		Dated Peshawar Zoo WZ 14/01/2020

To,

Mr. Majid Khattak
Mali, Peshawar Zoo

Subject: EXPLANATION REGARDING WILFUL ABSENCE

It has been observed for the last few days that you are not attending the office on time. Your habitual late coming is already reported & copied to Deputy Director. Yesterday you were absent from official duty without prior permission of the concerned official.

You are therefore directed to be punctual & explain your position immediately without wasting time.

↓
Administration Officer
Peshawar Zoo

No. 1106/AO-Zoo Dated 14/01/2020



Copy Forwarded to Deputy Director Peshawar Zoo

↓
Administration Officer
Peshawar Zoo

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(56)

173

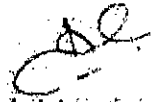
	OFFICE OF THE ADMINISTRATION OFFICER PESHAWAR ZOO	
	Phone: 091-5610011 Email: zoocare1@gmail.com	
No. 3187 / Zoo		Dated Peshawar Zoo the 07/10/2020

To,
The Director/Conservator,
Peshawar Zoo.

Subject: LEAVE DETAIL OF Mr. MAJID KHATAK (MALI PESHAWAR ZOO)
Reference: Your office letter No. 778/Zoo dated 06/10/2020

Respected sir,

Kindly find enclosed here with the details of month wise attendance of
Mr. Majid khatak (Mali Peshawar Zoo).


Administration Officer
Peshawar Zoo

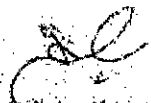
Abstract for 09 months

Total No. of days = 274

Total allowed holidays = 36 days

Availed holidays = 122 days



Total absence = 86 days


Administrative officer
Peshawar Zoo

(58)

61

Annex VI

	OFFICE OF THE ADMINISTRATION OFFICER PESHAWAR ZOO	
	Phone: 091-5610011 Email: zooadmin@gnibk.gov.pk	
No. 135/AO/Zoo		Dated Peshawar zoo the 02/01/2020

To,
 Deputy Director,
 Peshawar Zoo

Subject: SUBMISSION OF MONTHLY STAFF ATTENDANCE FOR DEC 2019

Respected sir,

Kindly find enclosed herewith the monthly staff attendance of all the staff at Peshawar zoo for the month of December 2019.

Following is the list of staff members whose daily attendance is extremely poor, neither have they attended the office/zoo on time nor they take any interest in their respective duties. Their entry and exit timings are highlighted in the attendance sheets provided with this letter.

S.No	Name	Designation	Remarks
1	Mr. Naveed Khan	Wildlife Watcher	Late Entry Early exit
2	Mr. Majid Khattak	Mali	Early Exit
3	Mr. Anil Masih	Sweeper	Late entry, early exit, weak performance, hundreds of excuses.
4	Mr. Asad Masih	Sweeper	Late entry and early exit
5	Mr. Asif Masih	Sweeper	Late entry and early exit
6	Mr. Noman Khan	Sweeper	Very poor performance, ill mannered, late entry, early exit, leaves without approval.
7	Mr. Wali Muhammad	Sweeper	Late entry, weak performance on regular basis
8	Mr. Shehzad	Sweeper	Late entry and early exit
9	Mr. Sikandar Khan	Security guard	Late entry on regular basis

[Signature]
 Administration Officer
 Peshawar Zoo

(59)

Appendix

XIV) XIV Absentees



OFFICE OF THE DEPUTY DIRECTOR/DFO
WILDLIFE PESHAWAR ZOO, PESHAWAR

Ph# 091-9221195

Email: ddirector66@gmail.com



No. 161 /DD/Zoo

Dated Peshawar the 06 / 05 /2020

To,

Director/Conservator Wildlife
Peshawar Zoo

Subject: WILLFUL ABSENCE/LACK OF INTEREST IN OFFICIAL DUTY

It is submitted that Mr. Asif Masih, Sweeper Peshawar Zoo and Mr. Majid Khattak, Mali Peshawar Zoo are continual source of concern for Peshawar zoo administration. They are taking no or least interest in their official duties. Their willful absenteeism has become a norm. Their absentees, misconduct and lack of interests have been reported several times by the administration officer which have also been corresponded with office of your good self. Explanation and leave without pay have also been served. But despite verbal direction along with explanation and warning in letter, they are least bothered by any directives. All measures to mend their ways and means have proven vain so far.

Your office is therefore requested to kindly take strict legal and logical action against them and suspend them from government service under E&D Rules 2011, in the interest of public please.

Deputy Director/DFO Wildlife
Peshawar Zoo

No. 162 /DD/zoo

Copy for information and necessary action forwarded to Administration Officer Peshawar Zoo with respect to his office reports.

Deputy Director/DFO Wildlife
Peshawar Zoo

- ① ماجد خٹک کا رویہ میرے ساتھ انتہائی خیر مناسب اور خیر اخلاقانہ ہے
- ② ڈیوٹی کے دوران میں نے اُسے انتہائی خیر ذمہ دار پایا۔
- ③ کام کی تفریق کرنے پر وہ بد تمیزیاں پر اتر آتا ہے۔
- ④ مجموعی طور پر اسکی کارکردگی خیر نسلی مجس ہے۔
- ⑤ اپنے کام میں وہ بالکل میں دلچسپی نہیں لیتا۔
- ⑥ جی ہاں، یہ بات بالکل درست ہے۔
- ⑦ ابتداد سے لیکر اب تک اسکی کارکردگی دن بہ دن خراب ہوتی جا رہی ہے۔
- ⑧ مجھ مستقبل میں اسکی کارکردگی میں بہتری کی کوئی امید نہیں
- ⑨ ماجد خٹک ایک خیر ذمہ دار انسان ہے۔ جسے اپنے سنٹرز سے بات کرنے کی کوئی تمیز نہیں۔ زمانہ ٹرنٹ وہ اپنی کڑائی اور سانس نفلت کے بارے میں بھارتی ہے۔ اور جب اُسے کام کرنے کا کہا جاتا ہے تو اسکا رویہ انتہائی نا اہل برداشت ہوتا ہے۔ اور دوبارہ ٹرود اپنی ڈپٹی سے خیر حاضر رہتا ہے۔

واہس
شعبہ باؤ

عابد علی واہم

① حاجر فٹنگ کاروبار میرے ساتھ تو مناسب رہا ہے لیکن وہ میرے اہل خانہ میں ہے نہیں۔ البتہ سارے سٹاف کے مطابق اس کاروبار فٹنگ نہیں

② دیوٹی کے دوران وہ ایک غیر ذمہ دار انسان ہے۔

③ کام کی نشاندہی کرنے پر بھی وہ کام کو تسلی بخش طریقے سے نہیں کرتا

④ مجموعی طور پر اسکی کارکردگی غیر تسلی بخش ہے۔

⑤ وہ اپنے کام میں کبھی بھی دلچسپی نہیں لیتا۔

⑥ جی ہاں یہ بات بالکل درست ہے۔

⑦ اسکی کارکردگی دن بدن خراب ہوتی جا رہی ہے۔

⑧ مجھ اسکی کارکردگی میں کوئی بہتری کی امید نہیں۔

⑨ حاجر فٹنگ ایک غیر ذمہ دار شخص ہے جو کہ ہر وقت اپنی سیاسی تعلقات کے بارے میں لگا رہتا ہے۔ اپنے سینئر سے بات کرنے کی بجائے سینئر نہیں، اور دیوٹی سے زیادہ تر غیر حاضر ہی رہتا ہے۔

واہم
عابد علی

وقایع و احوال

جواب نامہ ہے

(7) ماہہ خندا کی مگرگی دن بادن ضربی ہوتی چارسی ہے اور پیرنشا ہے کہ میرا پرویشن پیرنڈ غنم میں کے فود میرا کوئی کچھ نہیں بگاڑ نہیں سکتا اور میں منتر کا سزاؤں

(8) اس کی کارگردگی (مستقبل میں) سمندر کو پورنا میں بند کرنا کے مترادف ہے۔

(9) ماہہ خندا صفا کی طور پر لائبر، زبانی طور پر وہ عقول، رشتہ کی بداعلافا اور غنم زمیندار شخص سے ہے۔ اس کی بھری کی کوئی امید نہیں۔ اور چٹنا گھر کی بھری کیلئے ڈپوٹی سے خارج کرتا ہے

لوٹنے کے لئے اس میں مندرجہ کام پور نڈوں کو نہیں لیا تو مستقبل قریب میں یہ سٹاف غنم انتہائی کم کے خلاف کھڑا ہو جائے گا اور بیماری کوئی حشرت نہیں رہے گی۔

(Handwritten signature)

جواب نامہ۔
وقاہن واہم

(۱)۔ اس کا رویہ انتہائی غیر اخلاقی نامناسب ہے۔

(۲)۔ ڈیوٹی کے دوران کسی قسم کی دلچسپی میں لگتا اور بار بار اسرار اور سبوتاژ پر بھی وہ یہ صحیح طور پر سے باز نہیں آتا۔

(۳)۔ جب بھی کوئی واہم ماحد ختکہ کو کام کا لیتا ہے تو اس کا رد عمل یہ ہوتا ہے کہ میں ساتھ واہم لاگوئی کام نہیں (میں کسی واہم کو نہیں مانتا)۔

(۴)۔ ماحد ختکہ عالی نہ وقت یہ ڈیوٹی کھلے آتا ہے اور وقت سے پہلے چھڑتا کہ جوڑ بھر اجازت کے چلے جاتا ہے۔ بھر اجازت کھلی چھٹی کرتا ہے اور بات بات میں ساسی دھمکیاں اور کام کے وقت سے رہتا اس کا مقصد مشغول ہے۔

(۵)۔ ماحد ختکہ کسی قسم کی دلچسپی کے کام میں نہیں لیتا۔ کام کے دوران گلاڑیوں میں سو جانا۔ وقت بے وقت کیشیں چاکر چاڑھنا اور باقی ماندہ میناف جھانک رہیں بھینر مانی اور سوہنر آنتظام کے خلاف کرنا ہے اور یہ لیتا ہے کہ سرکاری کام کو گولی مارو۔

(۶)۔ یہ بالکل صحیح ہے کہ ماحد ختکہ کام کے دوران سوہا رہتا ہے اور اسکو دبا گنا کام روز سبے عالی کو کرنا پڑتا ہے۔

طفیل واچر

- (1) اس کا رویہ غیر مناسب اور غیر اخلاقی ہے۔
- (2) ڈیوٹی کے دوران ^{میں نے اس کو} لا اعتدال گپ شب اور سیاسی باتوں میں مصروف دیکھا گیا۔
- (3) ان کا کام کسی نیشنل ایس ایس وہ اپنے سینئر کے ساتھ بد مزگی کر رہے ہیں آتے آتے اور نہ ہی ان کے پاس کام کو سمجھتے ہیں۔
- (4) ان کے (ریجنی مالی کاموں) کے بارے میں ان کے ذہن میں کوئی بات نہیں ہے۔
- (5) ان کے ذہن میں وہ سیاسی باتوں اور اپنے جوبائل میں دس بارہ آگے واپس چلانے (پین) کی جگہ وہ نہیں سمجھتے۔
- (6) فارغ ہو جائے تب وہ دلچسپی لے گا۔
- (7) ان نے بالکل سچ ہے کہ وہ ڈیوٹی کے دوران ادھر ادھر تھرتھکتے گپ شب اور آرام میں گھومتے ہیں۔
- (8) ابتدائی سے لیکر اب تک میں نے ان کو کارکردگی میں کوئی خاص بہتری نہیں دیکھا ہے۔ ان کا وہ یہ ہے کہ وہ اپنے کام کو سمجھتے ہیں۔
- (9) میرے حساب سے مستقبل میں اس نے اخلاقی رویے کا کوئی امید نہیں رکھتا ہوں۔ آئندہ میں نے ان کو دیکھا ہے کہ وہ اپنے انٹرنیشنل کے پیچھے ^{مقبول} باتیں کرنے لگتے ہیں۔ اور جڑیا لکھ میں جب کوئی

جی جانور کسی بیماری سے مر جائے تو اس کے لاشے کو وہ سوشل میڈیکل افسر لے کر لے سکتا ہے۔

(9) ماحولیات کے لیے آلودگی اور زمین کی آلودگی سے متعلقہ کارروائیوں کے لیے ایک ایسی کمیٹی تشکیل دی جائے گی اور اس کے رکنوں کو اور ان کے

کام کے بارے میں سیکورٹی اور زمین کے لیے آلودگی سے متعلقہ کارروائیوں کے بارے میں وہ آئینہ (ایئر ایکٹیوٹی) سے متعلقہ کارروائیوں

کے بارے میں (ایئر ایکٹیوٹی) اور زمین کے لیے آلودگی سے متعلقہ کارروائیوں کے بارے میں (ایئر ایکٹیوٹی) سے متعلقہ کارروائیوں کے بارے میں (ایئر ایکٹیوٹی) سے متعلقہ کارروائیوں

کے بارے میں (ایئر ایکٹیوٹی) سے متعلقہ کارروائیوں کے بارے میں (ایئر ایکٹیوٹی) سے متعلقہ کارروائیوں کے بارے میں (ایئر ایکٹیوٹی) سے متعلقہ کارروائیوں کے بارے میں (ایئر ایکٹیوٹی) سے متعلقہ کارروائیوں

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محمد طفیل
S/16/050
تاریخ: 16/05/05

(1)

نولید خان واجپر

جواب نامہ

- ① ماجر فلک کا رویہ انہی ہی بلڈقیمنی والے ہے۔ اور آج تک ان کے ساتھ ابھی بھی خوشگوار انداز میں بات نہیں ہوئی
- ② دوپوٹی میں اسے ٹیپو ڈمدورار پایا ہے۔ اور جب بھی کام کا پارے میں بات ہوئی تو والچی میں بلڈقیمنی پراکراتا ہے۔
- ③ کام کی تشاندی کرتے ہیں بلڈقیمنی کرتا ہے۔ کہ جو جانگا یہ مہر مہر کام تک نہیں ہے۔ اور مطلوب نام نہیں کرتا۔
- ④ آج کل اس کا کام ٹیپو انتہائی مختصر بقسطی بخش ہے
- ⑤ وہ اپنے آپ کو سیاسی سمجھتا ہے۔ سارا وقت بھٹنے اور سیاسی گفتگو میں گزارتا ہے۔ اور کام میں کوئی دلچسپی نہیں لیتا۔
- ⑥ ان میں سے بھی ہے۔ اس میں کوئی شک نہیں ہے۔
- ⑦ ماجر فلک کی کارکردگی میں بہتری کے کوئی اثرات نظر نہیں آتے۔
- ⑧ ہر اجتناب جس وقت اس کے ساتھ کام کرتے ہیں۔ تو اس کے کام میں اور اضافی میں بہتری سرن کی کوئی امید نہیں۔
- ⑨ ماجر فلک ایک غیر ذمہ دار انسان ہیں۔ اور انتہائی بلڈقیمنی کا رویہ کا حامل انسان ہے۔ اگر اس کے ساتھ کام کرنا بارے میں بات ہو جائے تو اسی کو کہتا ہے اور اگر اسے کچھ کہا جائے تو اپنے آپ کو چڑیا مہر کا ڈون (Don) سمجھتا ہے اور کہتا ہے کہ مہر کوئی کچھ بھی نہیں بگاڑ سکتا۔ اور اپنے سیاسی اثرات سونے کو استعمال کرنے کی دھمکی دیتا ہے۔ کہ اس کے ذریعے میں آپ کو نقصان پہنچا سکتا ہوں۔ غیر ذمہ داری اور بلڈقیمنی والے اظہار کو صریح ہے۔ کہ لیت آتا ہے۔ اور پھر جلدی چلا جاتا ہے۔

(4)

جواب نامہ :-

- ① ماجد فٹاک کا رویہ میرے سابقہ انتہائی غیر مناسب اور غیر اخلاقی رہا ہے
- ② ڈیوٹی کے دوران میں نے اسے انتہائی غیر ذمہ دارانہ پایا۔
- ③ مجموعی طور پر یا انفرادی طور پر کام کی نشاندہی پر وہ بہت کمزور اور اہمیت پر اترتا ہے
- ④ ماجد فٹاک کی کارکردگی مجموعی طور پر غیر تسلی بخش ہے۔
- ⑤ اپنے کام میں وہ بالکل بھی دلچسپی نہیں لیتا۔
- ⑥ جی ہاں یہ بات بالکل درست ہے۔
- ⑦ ابتداء سے لے کر اب تک اس کی کارکردگی دن بہ دن خراب ہوتی جا رہی ہے۔
- ⑧ مجھے مستقبل میں اس کی کارکردگی میں بہتری کی کوئی امید نظر نہیں آ رہی ہے
- ⑨ ماجد فٹاک انتہائی غیر ذمہ دار انسان ہے جسے اپنے سینئر کے سابقہ بات کرنے کی کوئی ٹینر نہیں۔ زیادہ تر وقت وہ اپنی بڑائی اور سیاسی گفتگو میں گزارتا ہے۔ یہ سب کام وہ ڈیوٹی کے وقت میں کرتا ہے۔ اور جب اسے کام کرنے کو کہا جاتا ہے تو اس کا رویہ انتہائی ناقابل برداشت ہوتا ہے۔ اور زیادہ تر وہ ڈیوٹی سے غیر حاضر رہتا ہے۔ لیٹ آتا ہے اور جلدی جاتا ہے۔

ماجد فٹاک

جواب نمبر۔

- ①- میرا ڈیوٹی پر حاضر ہی کا ڈیوٹی ہو گیا ہے۔ اور کچھ پانچ سو گز یا دو گز باقی رہے ہیں۔
- ②- میں نے اسے ایک دفعہ کام کرتے ہوئے دیکھا ہے (میں باقی تمام وقت کچھ لیٹا، کبھی لوگوں کے ساتھ کبھی شب اور کبھی ٹرپس یا گھڑے پائے دیکھا۔)
- ③- وہ اپنی جگہ پر صدمہ نہیں کرتا اور کام کی نشاندہی پر کیا کرتا۔
- ④- میں نے کوئی خاص کام کرتے نہیں دیکھا۔
- ⑤- میں نے اوپر بیان کیا ہے لیکن پھر سے درست ڈاچمنڈ کی ذمہ داری یہ کام میں کوئی دیکھی نہیں لیٹا۔

⑥- اس سے پتہ چلے گا۔

⑦- میں نے اوپر بیان کیا ہے کہ اگر ڈیوٹی تب سے چلتا ہے جب میرا کام ختم ہو جاتا ہے۔

⑧- میرے علم کے مطابق اس بندے کو ^{پہلے} بہت سے (Explanation) کے خطوط بھیجے گئے ہیں۔

⑨- ماچھنڈ (مالی) سے پہلے ملاقات میں اس نے اسے پہلے بیماری کے بہانے بنا کر

اور یہ بات بہت ڈیڑھ گھنٹے پہلے ہوئی تو اس نے سب سے اسٹریٹو کی بات کر کے

کی اور کہا کہ میرے فلائنگ ٹیم کے ساتھ اسے فون کر کے اپنا کام کمال دے سکتا

ہے۔ اور ڈاچمنڈ صاحبان کے بارے میں کہا کہ یہ تمام میرے خلاف

کے ہیں۔

Fahim Ullah

Fahim Ullah Watcher

Handwritten signature or name at the top right.

Main body of handwritten text in Urdu script, consisting of several lines of prose.

- (1) ...
- (2) ...
- (3) ...
- (4) ...
- (5) ...
- (6) ...
- (7) ...
- (8) ...
- (9) ...
- (10) ...

- منتهی ہوتی ہے اور اس میں کوئی تبدیلی نہیں آتی ہے۔
 - اس کے ساتھ ساتھ اس میں کوئی تبدیلی نہیں آتی ہے۔
 - اس کے ساتھ ساتھ اس میں کوئی تبدیلی نہیں آتی ہے۔
 - اس کے ساتھ ساتھ اس میں کوئی تبدیلی نہیں آتی ہے۔
 - اس کے ساتھ ساتھ اس میں کوئی تبدیلی نہیں آتی ہے۔

- اس کے ساتھ ساتھ اس میں کوئی تبدیلی نہیں آتی ہے۔
 - اس کے ساتھ ساتھ اس میں کوئی تبدیلی نہیں آتی ہے۔
 - اس کے ساتھ ساتھ اس میں کوئی تبدیلی نہیں آتی ہے۔

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