

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M. NO. _____/2023

IN

Service Appeal No.1891/2022

Khyber Pakhtunkhwa
Service Tribunal

USMAN KHAN

V/S FOOD DEPTT:

Diary No. 4490

Dated 21/3/2023

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Dated 21.03.2023

APPLICANT/APELLANT

Through:


NOOR MOHAMMAD KHATTAK
Advocate Supreme Court.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

C.M. NO. _____/2023

IN

Service Appeal No.1891/2022

USMAN KHAN

V/S FOOD DEPTT:

**APPLICATION FOR PLACING ON FILE
NECESSARY DOCUMENTS IN THE ABOVE TITLE
SERVICE APPEAL**

Respectfully Sheweth:

1. That the above title service appeal is pending adjudication before this Honourable Tribunal which has been fixed for hearing on 21.03.2023
2. That there are some necessary documents that need to be placed on file for the just and fair decision in the above titled service appeal. Copy of Additional Documents are attached as **AnnexureA.**
3. That any other grounds and proof with regard to the additional documents would be raised at the time of argument with prior permission of this Honourable Tribunal.

It is, therefore, most humbly prayed that on acceptance of this application on behalf of the appellant the additional documents may be placed on file, for just and proper decision of the above mentioned service appeal.

Dated 21.03.2023


APPLICANT/APPELLANT
USMAN KHAN

Through: .


NOOR MOHAMMAD KHATTAK
Advocate Supreme Court.

AFFIDAVIT

I, **Usman Khan** (the Applicant/Appellant) do hereby solemnly affirm and declare on Oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Court.


DEPONENT





"A"

-2-

FOOD DIRECTORATE
KHYBER PAKHTUNKHWA,
PESHAWAR

No. 1752/C-6-(S.T)

Dated 09/05/2022

To

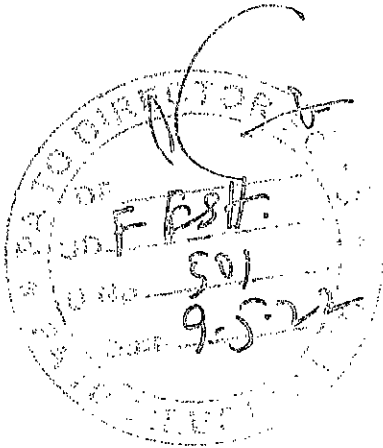
The Director Food,
Khyber Pakhtunkhwa,
Peshawar.

Subject:- INQUIRY REPORT AGAINST MR. USMAN KHAN EX-FOOD
GRAIN SUPERVISOR OFFICE OF DISTRICT FOOD
CONTROLLER, CHITRAL UPPER REGARDING ALLEGED
CHARGES OF EMBEZZLEMENT/MISAPPROPRIATION OF 789
(78.9 M.TON) WHEAT BAGS VALUING RS.2.7615 MILLION AT
PRC CENTERS BOONI & KHUSUM, DISTRICT CHITRAL UPPER.

Reference to charge sheet/statement of allegations dated
05.04.2022 on the subject noted above.

In this regard inquiry conducted by the undersigned containing 05 pages
and 23 Annexures are submitted for perusal and further necessary action,
please.


ASSISTANT DIRECTOR LITIGATION
FOOD DIRECTORATE
KHYBER PUKHTUNKHWA



ATTESTED
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INQUIRY REPORT

INQUIRY REPORT AGAINST MR. USMAN KHAN EX- FOOD GRAIN SUPERVISOR OFFICE OF DISTRICT FOOD CONTROLLER, CHITRAL UPPER REGARDING ALLEGED CHARGES OF EMBEZZLEMENT/ MISAPPROPRIATION OF 789 (78.9 M.TON) WHEAT BAGS VALUING RS.2.7615 MILLION AT PRC CENTERS BOONI & KHUSUM, DISTRICT CHITRAL UPPER.

The Director Food, Khyber Pakhtunkhwa /competent authority vide a letter No.1460/PF-1123 dated 05.04.2022 has appointed the undersigned as Inquiry Officer to conduct formal inquiry against Mr. Usman Khan, accused official, ex-Food Grain Supervisor, DFC Chitral (upper) on account of allegations contained in the charge sheet, served upon him in this regard (Annex- I & II).

BACKGROUND

Mr. Usman Khan joined Food Department as Food Grain Supervisor, FGS (BS-06) vide Director Food Khyber Pakhtunkhwa, office order no.261121/ET-542 dated 24.11.2008 and was assigned the charge of Provincial Reserve Centers, Booni and Kushum, District Chitral (Annex III & IV). District Food Controller, Chitral reported vide a letter no.1553/Usman khan dated 6.6.2014, letter No.1560/Usman Khan dated 6.6.2014, letter No.1591/Usman Khan FGS dated 10.6.2014 that during physical verification a quantity of 789 bags 78.9 (M. Tons) wheat valuing Rs.2.7615 Million was short detected against Mr. Usman Khan, FGS, Incharge Provincial Reserve Centers Booni and Khusum (Annex-V,VI & VII). An amount of Rs.350000/- on account of cost of wheat/empty gunny bags had been recovered from the official and deposited into Government treasury through proper Challan. Regarding the balance of Rs.2411500/-, the accused official was served with a notice to deposit the outstanding balance amount into government treasury and produce Original treasury Challan but he failed to deposit the outstanding amount till date.

The District Food Controller Chitral had worked out the cost of wheat on the basis of issue price i.e Rs.3500 per bag, and thus the total amount including landed cost of the embezzled quantity comes out to be Rs.3.353 Million, out of which, the accused official has already deposited Rs.0.35 Million while Rs.3.003 Million are still outstanding against the accused official.

Prior to this, Mr. Usman Khan ex-FGS was served with a show Cause Notice vide Food Directorate letter No.6533/PF-1123 dated 06.11.2014, letter No.6793/PF-1039 dated 21.11.2014 and letter no.1258/PF-1039 dated 27.02.2015 but he did not submit his reply. An opportunity of personal hearing was also given to the accused official on 19.03.2015 by competent authority, but he failed to appear before the competent authority to be heard in person (Annex-VIII, IX & X). The accused official did not deposit the outstanding amount of Rs.3.003 million into government treasury rather absented himself time and again. By doing such delaying tactics, the said ex-official was held responsible for embezzlement/misappropriation of 789 bags (78.9M. tons wheat costing Rs.3.003 million). Consequently, the competent authority while exercising his powers vide Food Directorate letter No.2037/PF-1123 dated 21.04.2015 had directed to this effect that the embezzled /misappropriated amount outstanding

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against the accused official be recovered from his movable/immovable property as per law/Rules (Annex-XI).

Moreover, vide a letter No.1554-58/usman khan dated 06.06.2014, the DFC Chitral addressed a letter to Mr. Usman khan ex-FGS, with its copy endorsed to Director Food KP and other concerned officers directing him to deposit the Government amount into government treasury and produce its original challan to his office within a week failing which his case shall be forwarded to Director Anti-corruption, Establishment Peshawar for necessary action. Since the accused official did not comply with the letter dated 6.6.2014, therefore, the Director Food KP Peshawar vide a letter no.587/PF-1123 dated 16.10.2014, addressed to Director Anti-Corruption Establishment Govt of KP, Peshawar requested thereof that the matter be investigated and complete recovery be effected from the accused official (Annex-XII). Finally an FIR No.2 dated 16.10.2014 was registered against the accused official in the anti-corruption police station Chitral by District Food Controller, Sher Fayyaz and now a case no.63 of 2017 is pending in the court of Special Judge Anti-Corruption KP at Swat and next date fixed for hearing is 13.5.2022. (Annex-XIII)

PROCEEDINGS

The undersigned requisitioned the relevant record from the Mr. Sher Fayyaz DFC Chitral lower, Mr. Arshid Hussain DFC Chitral Upper, Mr. Riaz Ahmad AFC Chitral Lower and Mr. Usman Khan, the accused official was directed to appear before the undersigned on 19.4.2022 at 11.am along with the relevant record for recording their statements but they didn't appeared on the date fixed. However Mr. Usman Khan accused official though appeared before the undersigned on 19.4.2022 at 11 am yet no reply to the charge sheet served upon him was submitted by him and sought some time for submission of reply to the charge sheet. Subsequently the undersigned through registered letter dated 20.04.2022 addressed to DFC Sher Fayyaz, DFC Arshid Hussain, AFC Riaz Ahmed and Usman Khan was issued asking them to appear before the undersigned on 22.4.2022 at 11 am for recording their statements. On 22.4.2022, the following officers/officials came to Directorate Food Peshawar and recorded their statements as under:

Statement of Sher Fayyaz Khan, District Food Controller, Lower chitral

On 22.4.2022, Mr. Sher Fayyaz Khan District Food Controller, Lower Chitral recorded his statement as follows:

- i. During his tenure, working as District Food Controller, physical verification of PRC Booni and PRC Kushum was carried out vide letter No.1093-99/1/1-AC dated 16.4.2014 by Mr. Arshid Hussain, Assistant Food Controller and Riaz Ahmad, Food Grain Inspector
- ii. During physical verification conducted by the team, shortage of wheat and Empty Gunny Bags were detected short amounting to Rs.3033715/-
- iii. The Incharge of both PRCs Mr. Usman Khan, accused official was directed time and again by DFC Chitral to deposit the said amount into government

- treasury but he was reluctant to do so and finally flatly refused to deposit the same amount.
- iv. Later on his case was referred to Anti-corruption Establishment Peshawar and also an FIR was lodged against him for recovery of the said government outstanding amount.
 - v. Presently the case is pending in the court of Anti-Corruption Judge KP at Swat and next date of hearing is 13.5.2022.
 - vi. As per statement of DFC, lower Chitral, a sum of Rs.350000/- has been recovered from Mr. Usman Khan accused official till this date. (Annex-XIV)

Statement of Arshad Hussain AFC, (now DFC Upper Chitral) and Riaz Ahmad FGI, (now AFC Lower Chitral)

Both stated before the undersigned that on the order of DFC Chitral, vide No.1093-99/1/1-AC dated 16.04.2014, they conducted physical verification of the PRC Booni and Kushum. During physical verification shortage of wheat and EG bags amounting to Rs.3033715/- was detected. DFC Chitral directed Usman Khan ex-Incharge PRC Booni & PRC Kushum to deposit the said amount into government treasury but the accused official flatly refused to deposit the same amount. Later on this case was referred to Anti-Corruption Establishment, Peshawar for recovery of Government outstanding amount and FIR was registered against him in the anti-corruption police station Chitral for recovery of the said amount. This case is under trial before the special judge anti-corruption court KP at Swat and the next date fixed is 13.5.2022. (Annex-XV)

Statement of Mr. Usman Khan, ex-FGS, Incharge PRC Booni/Kushum

Mr. Usman Khan ex-FGS, accused official while appearing before the undersigned on 22.4.2022 did not record his statement but submitted already typed reply to the charge sheet/statement of allegations already served upon him by the Competent Authority.

Perusal of the reply submitted by the accused official reveals that he has refuted and denied all the allegations levelled against him in the charge sheet. The accused official mainly focused on this fact that he was untrained and freshly appointed and was assigned the charge of Godown without any training and guidance by the department in this regard.

Moreover, the accused official stated in para (iii) of his reply that detection of 789 bags is incorrect but in the same breath he also stated thereon that a sum of Rs.350000/- has been deposited against actual sale of 100 wheat bags into government treasury.

Mr. Usman Khan, the accused official was afforded full opportunity to cross examine the officials/officers who recorded their statements against him but no substantial objections were raised by accused official during inquiry proceedings nor any concrete evidence was produced by accused official to confront their statements which were recorded against him. The accused official was given sufficient time to produce evidence in his defense but he failed to produce any evidence in this behalf. (Annex-XVI)

FINDINGS & ANALYSIS

After perusal of the relevant record and statements of the concerned officials/officers namely Mr. Sher Fayyaz DFC, Mr. Arshid Hussain DFC and Mr. Riaz Ahmad AFC, it is clear that after taking over charge of the post of DFC Chitral by Mr Sher fayyaz khan, he issued office order No.1093-99/1/1-AC dated 16.4.2014 to Incharge, Assistant Food Controller, sub division Mastuj and Chitral to conduct physical verification of wheat at PR Center Booni and Kushum under the charge of Mr. Usman khan ex-FGS. After carrying out physical verification of the stock of wheat by the inspection team, a quantity of 775 bags at PR center Booni and 14 bags at PR center Kushum, costing Rs.2411500/- was short detected against accused official (Mr.Usman Khan) (**Annex-XVII, XVIII, XIX, XX & XXI**). The DFC issued notice to accused official to deposit the cost of the above mentioned quantity into government treasury within 7 days vide letter No.1553/Usman Khan dated 6.6.2014, letter No.1660/Usman Khan dated 6.6.2014 with its copy endorsed to Director Food KP, Peshawar, PS to Minister Food, Secretary Food, KP and others. The Director Food, KP was also informed to forward the case to Director Anti-Corruption, Establishment KP, Peshawar vide letter No.1591/Usman Khan dated 10.6.2014. The accused official was also given an opportunity to deposit the cost of short quantity of wheat into government treasury. However in the meantime the accused official (Mr. Usman Khan) deposited an amount of Rs. 350000/- into government treasury (**Annex-XXII & XXIII**). Furthermore the Director Food KP, Peshawar also forwarded the case of accused official to Director Anti-Corruption Establishment KP, Peshawar to investigate the matter for effecting complete recovery from the accused official vide letter no.5817/PF-1123 dated 16.10.2014. All relevant records pertaining to this case were sent to circle officer anti-corruption chitral by the DFC Chitral. Presently the case of the accused official is pending in the court of Special Judge Anti-Corruption Establishment, KP at camp court, Swat titled "State vs Usman Khan". As per statement of the DFC Sher Fayyaz, the next date fixed for hearing in this case is 13.5.2022.

Perusal of the statements of DFC Sher Fayyaz, and joint report submitted by DFC Arshid Husain & AFC Riaz Ahmad coupled with relevant record obtained from DFC Chitral, it seems that the charges levelled against the accused official (Mr. Usman Khan) are partially proved, but in this episode the role of supervising officers cannot be ignored, the statements given by the DFC and AFC are the only proves available against the accused official.

CONCLUSION/RECOMMENDATION

After having gone through the relevant record as well as written statements recorded by the concerned officials/officers based on documentary proofs, the undersigned recommends that:

- i. The accused official (Mr. Usman khan) may be inflicted any minor penalty for his negligence and carelessness as laid down under Rule 4(1)(b) of the KP Government Servants (Efficiency and Discipline) Rules, 2011.
- ii. As the Director Food Khyber Pakhtunkhwa, Peshawar already forwarded the case of accused official to Director Anti-Corruption

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Establishment KP, Peshawar to investigate the matter for effecting complete recovery from the accused official vide letter no.5817/PF-1123 dated 16.10.2014. FIR already launched and case is subjudice. Therefore, decision regarding recovery of any amount from the accused official shall be subject to the outcome of the criminal case.

- iii. As regards the issue of back benefits it is suggested that it is settled principle of law that where there is work, there is pay. Since the accused official (Mr. Usman khan) has not rendered any duty, therefore, he is not entitled to back benefits in this regard and the intervening period may be converted into leave without pay.

Submitted, please.

(The inquiry consists of 05 pages and 23 Annexures)



(HAFAEZ UR REHMAN)
Assistant Director Litigation
Food Directorate, KP, Peshawar

~~ATTESTED~~

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DIRECTOR FOOD,
KHYBER PAKHTUN KHWA,
PESHAWAR



GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF FOOD, PESHAWAR

No: 1461 /PF-1123

Dated: 05/04/2022

☎ 091-9225378 M fooddirectoratetkpk@gmail.com 📠 foodKPGovt 📧 @foodkpgovt

CHARGE SHEET

I, Kashif Iqbal Jilani, Director Food Khyber Pakhtunkhwa, as competent authority hereby charge you (Mr. Usman Khan Foodgrain Supervisor) as follows:-

2. That you, while posted as Foodgrain Supervisor office of District Food Controller, Chitral now Upper committed the following irregularity:-

- a) The District Food Controller, Chitral reported vide letters No.1554-58/Usman Khan dated 06-06-2014, No. No.1561-65/Usman Khan dated 06-06-2014, No.1591/Usman Khan FGS, dated 10-06-2014 and office order No.2535-39/4/3-ET, dated 02-10-2014 (copy enclosed) that during physical verification carried out in the current financial year a quantity of 789 bags (78.9) M. Tons wheat valuing Rs.2761500/- was short detected against you (Mr. Usman Khan Foodgrain Supervisor Incharge Provincial Reserve Centres Booni and Kushum). An amount of Rs.350000/- on account of cost of wheat/ empty gunny bags has been recovered from you and deposited into Government treasury through proper Challan leaving behind, a balance of Rs.2411500/- You were served last notice by the DFC Chitral with the direction to deposit the remaining balance into Government treasury and produce Original treasury Challan within one week time, but you have failed to deposit the outstanding amount.
- b) The District Food Controller, Chitral has worked out the cost of wheat on the basis of issue price ie. 3500 per bags however the landed cost of the embezzled quantity at the present rate comes out to be Rs.3.353 Million out of which you have deposited Rs.0.35 Millions while Rs.3.003 Millions are still outstanding against you.

3. By reason of the above, you appear to be guilty of misconduct under rule-3 of the Khyber Pakhtunkhwa Government Servant Efficiency & Discipline Rules 2011 which rendered you liable to all or any of the penalties specified in rule-4 of the ibid rules. Mr. Kamal Ahmad Khan AFC Food Directorate was appointed as Enquiry Officer, wherein he submitted an application dated 17-03-2022 that his name may be replaced with well versed and expert officer, therefore Mr. Harjeez ur Rehman AD Lit is hereby appointed as an Inquiry Officer.

4. Your written defence, if any, should reach the Inquiry Officer within the specified period, failing which, it shall be presumed that you have no material in your defence and, in that case, ex-parte action shall be taken against you.

5. Please also intimate whether you desire to be heard in person.

6. A statement of allegations is enclosed.

DIRECTOR FOOD,
KHYBER PAKHTUN KHWA,
PESHAWAR

ATTESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA

DIRECTORATE OF FOOD, PESHAWAR

No: 146/PF-1123

Dated: 21/04/2022

091-9225378 | fooddirectoratkok@gmail.com | [foodKPGovt](https://www.facebook.com/foodKPGovt) | [@foodkpgovt](https://www.instagram.com/foodkpgovt)

STATEMENT OF ALLEGATIONS

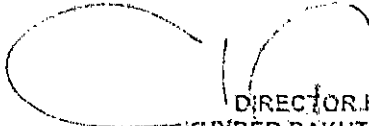
1, Kashif Iqbal Jillani, Director Food Khyber Pakhtunkhwa, being competent authority, am of the opinion that Mr. Usman Khan, Foodgrain Supervisor Office of District Food Controller, Chitral now Upper has rendered himself liable to be proceeded against, as he committed the following act /omission, within the meaning of Rule-3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011:-

- a) The District Food Controller, Chitral reported vide letters No 1554-58/Usman Khan dated 06-06-2014, No.1561-65/Usman Khan dated 06-06-2014 No 1591/Usman Khan FGS, dated 10-06-2014 and office order No.2535-39/4/3-ET, dated 02-10-2014 that during physical verification carried out in the current financial year a quantity of 789 bags (78.9) M Tons wheat valuing Rs.2761500/- was short detected against Mr. Usman Khan Foodgrain Supervisor Incharge Provincial Reserve Centres Booni and Kushum. An amount of Rs.350000/- on account of cost of wheat/ empty gunny bags has been recovered from him and deposited into Government treasury through proper Challan leaving behind, a balance of Rs.2411500/- he was served last notice by the DFC Chitral with the direction to deposit the remaining balance into Government treasury and produce Original treasury Challan within one week time, but he has failed to deposit the outstanding amount.
- b) The District Food Controller Chitral has worked out the cost of wheat on the basis of issue price i.e. 3500 per bag however the landed cost of the embezzled quantity at the present rate comes out to be Rs.3.353 Million out of which the accused has deposited Rs.0.35 Millions while Rs.3.003 Millions are still outstanding against him.

2 After completion of all codal formalities the official was removed from service vide Office Order No 2037/PF-1123 dated 21-04-2015. Now in compliance with Khyber Pakhtunkhwa Service Tribunal Peshawar Judgment dated 26-01-2022, in case of Service Appeal No. 1029/2016, wherein in the Hon.able Service Tribunal partially accepted the Service Appeal to re-instate the appellant and the Department is directed to conduct the de-novo Enquiry within 90 days of the receipt of this Judgment. Therefore, for the purpose of inquiry against the said accused with reference to the above-cited allegations, Mr. Hafeez ur Rehman Assistant Director (Litigation) Food Directorate Khyber Pakhtunkhwa Peshawar is hereby appointed as an Inquiry Officer under rule 10 (1) (a) of the ibid rules.

3 The Inquiry Officer shall, in accordance with the provisions of the ibid rules, provide reasonable opportunity of hearing to the accused, record his statement and submit the inquiry report within thirty days of the receipt of this order.

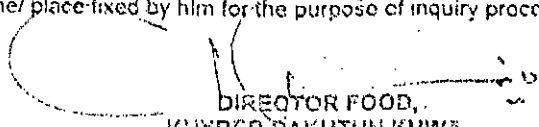
4 The accused and a well-conversant representative of the department shall join the proceedings on the date, time and place fixed by the Inquiry Officer.


DIRECTOR FOOD,
KHYBER PAKHTUNKHWA,
PESHAWAR

Endorsement No & date Even

A copy of the above is forwarded to:-

- 1) Mr. Hafeez ur Rehman Assistant Director (Litigation) Food Directorate, Khyber Pakhtunkhwa Peshawar for initiating proceedings against the accused under the provisions of the Khyber Pakhtunkhwa ESD Rules, 2011 (Copies of Charge Sheet and Statement of Allegations are enclosed)
- 2) The Assistant Director Food Malakand Division for information with the direction to submit / provide complete record to the Inquiry Officer for the purpose of the enquiry proceedings
- 3) The District Food Controllers, Chitral Upper and Lower for information with the direction to submit / provide complete record to the Inquiry Officer for the purpose of the enquiry proceedings.
- 4) Mr. Usman Khan, Foodgrain Supervisor Office of District Food Controller, Chitral Upper with the direction to appear before the Inquiry Officer on the date/time/ place fixed by him for the purpose of inquiry proceedings


DIRECTOR FOOD,
KHYBER PAKHTUNKHWA,
PESHAWAR

NO. 24/23/ET-542

Dated 24/11/2008


APPOINTMENT OFFER

On the recommendation of Departmental Selection Committee of Food Directorate NWFP Peshawar, Usman Khan S/O Kameen Khan Mohallah Bhatai Korona V& Post Office Hathian Bakhela Mardan is hereby offered a temporary post of Food grain Supervisor (BPS-06) on the following terms & conditions:-

- i. His employment in the Food Department would be purely on temporary basis.
- ii. His services will be subject to Medical fitness for Government service. He should produce Medical fitness certificate from the Medical Superintendent/Civil Surgeon of a Government Hospital.
- iii. He will be governed by the Rules and Regulations issued by the Government from time to time for such category of Government servants to which he belongs.
- iv. His service is not pensionable and he will not claim any pension/provident for the service rendered by him.
- v. His employment will be subject to deduction of Benevolent Fund and contributory Provident Fund as required under the policy.
- vi. He will join duty at his own expenses.
- vii. He shall produce domicile certificate of being a bonafide resident of NWFP.
- viii. In case he wishes to resign at any time, one month notice will be necessary or one month pay in lieu thereof will have to be forfeited to Government.

2. If he accepts the post on the above terms and conditions, he should convey his acceptance in writing to the undersigned by 24/11/2008 and produce original domicile and academic qualifications certificates as well as character certificate from two respectable persons not being his relatives who are well acquainted with him.

3. The appointment offer will be cancelled if no reply is received or the candidate failed to respond by the due date.



 DIRECTOR FOOD, NWFP,
 PESHAWAR.

Dated 24/11/2008

E.No. 24/23-24/ET-542

Copy forwarded to :-

- 1. The P.S. to Minister Food, NWFP for information of the Minister Food, NWFP.
- 2. The P.S. to Secretary Food, NWFP for information of the Secretary Food, NWFP.
- 3. Usman Khan S/O Kameen Khan Mohallah Bhatai Korona V& Post Office Hathian Bakhela Mardan for information & compliance.


 DIRECTOR FOOD, NWFP,
 PESHAWAR.



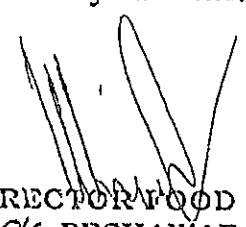
OFFICE ORDER

~~Amir III~~ -11- 228
FOOD DIRECTORATE, NWFP,
PESHAWAR
No. 27336 /ET-542
Dated 28/11/2008

Consequent upon the acceptance of appointment offer bearing No. ET-542 dated 24-11-2008 and in pursuance of NWFP, Establishment & Administration Department Circular letter No.SOR-VI (ER&A)1-13/2008 dated 10-08-2008 Mr. Usman Khan S/O Kameen Khan Mohallah Battli Koroonna Village & Post Office Hathian Tehsil Takht Bhai District Mardan hereby appointed as Foodgrain Supervisor, (BPS-06) on temporary basis on the terms and conditions laid down in his appointment offer referred to above.

2. On appointment as Foodgrain Supervisor (BPS-06), he is hereby posted in District Food Controller Office Chitral, against the vacant post.


3. He shall be on probation for a period of one year which can be extended subject to his performance as per rules.


DIRECTOR FOOD NWFP,
o/c PESHAWAR.
Dated 28/11/2008

EX. No. 27337-44 /ET-542

Copy forwarded to :-

1. P.O. to Minister Food for information of the Minister Food, NWFP Peshawar.
2. P.S. to Secretary Food, NWFP for information of the Secretary Food, NWFP Peshawar.
3. Accountant General, NWFP, Peshawar.
4. The District Accounts Officer Chitral *o/c chitral*
5. The Budget Officer Food Directorate NWFP Peshawar.
6. The District Food Controller, Chitral.
7. Mr. Usman Khan S/O Kameen Khan Mohallah Battli Koroonna village & Post Office Hathian Tehsil Takht Bhai District Mardan
7. ET-542/Personal File


DIRECTOR FOOD NWFP,
o/c PESHAWAR.

RECEIVED

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① ~~Annex V~~

OFFICE OF THE DISTRICT FOOD CONTROLLER CHITRAL.

No. 1553 /Usman Khan, Dated Chitral the 6 /06/2014.
To,

Mr. Usman Khan FGS,
Incharge PRC Booni/Kushum.

Subject: - RECOVERY OF GOVERNMENT DUES/FINAL NOTICE.
Memo:-

Reference Director Food Khyber Pakhtunkhwa letter No.3482/ET-660-enquiry-2013, dated 04/06/2014 address to this office and copy endorsed to others. (Photo state copy of which is enclosed for your ready reference).

2. You are hereby finally directed to deposit the Government dues into Government treasury and produce original treasury challan to this office within a weak time positively. Otherwise case will be forwarded to Food Directorate for onward submission to the Director Anti Corruption Establishment for necessary action.

to be treated most important.

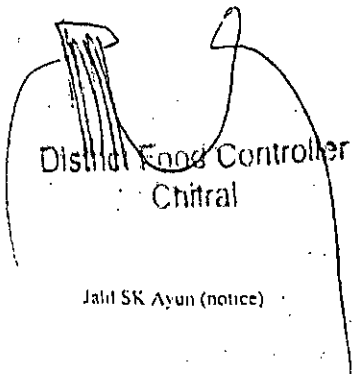

District Food Controller,
Chitral.

No. 1554-58 /Usman Khan, Dated Chitral the 6 /06/2014.

Copy forwarded to:-

1. The Director Food Khyber Pakhtunkhwa Peshawar for information with reference to above, please.
2. PS to Minister Food Khyber Pakhtunkhwa for information, please.
3. PS to Secretary Food Government of Khyber Pakhtunkhwa for information of the Hon'able Secretary Food.
4. The Assistant Director Food Malakand Division at Saidu Sharif Swat for information.
5. Assistant Food Controller Mastuj at Booni with the direction to ensure the deposit of cost of short fallen quantity into Government treasury by Mr. Usman Khan FGS Incharge PRC Booni/Kushum with in one weak positively.

ATTACHED


District Food Controller
Chitral
Jalil SK Ayun (notice)


District Food Controller,
Chitral.

ATTACHED

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~~Amman Khan~~

OFFICE OF THE DISTRICT FOOD CONTROLLER CHITRAL.

No. 1561 / Usman Khan.

Dated Chitral the 6 / 06 / 2014.

To,

Mr. Usman Khan FGS,
Incharge PRC Booni/Kushum.

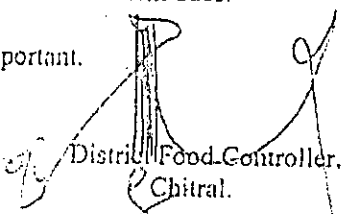
Subject: - DEPARTMENTAL PROMOTION COMMITTEE MEETING /
NOC.

Memo:-

Reference Director Food Khyber Pakhtunkhwa letter No.3491/ET-660-enquiry-2014, dated 04/06/2014 and subsequent telephonic message of Director Food Khyber Pakhtunkhwa conveyed by Mr. Falak Naz Assistant Establishment Branch Food Directorate on 05/06/2014.

2. You are hereby directed to deposit the Government dues into Government treasury by Monday i.e. 09/06/2014 positively, other wise case will be forwarded to Food Directorate for onward submission to the Director Anti Corruption Establishment and your promotion will be stopped till clearance of Government dues.

Matter may be treated most important.

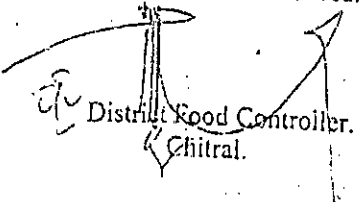

District Food Controller,
Chitral.

No. 1561-65 / Usman Khan.

Dated Chitral the 6 / 06 / 2014.

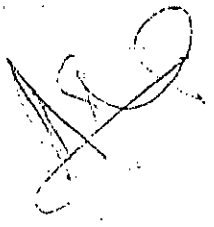
Copy forwarded to:-

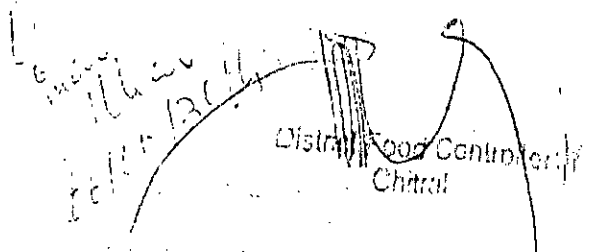
1. The Director Food Khyber Pakhtunkhwa Peshawar for information with reference to above, please.
2. PS to Minister Food Khyber Pakhtunkhwa for information, please.
3. PS to Secretary Food Government of Khyber Pakhtunkhwa for information of the Hon'able Secretary Food.
4. The Assistant Director Food Malakand Division at Saidu Sharif Swat for
5. Food Controller Mastuj at Booni with the direction to ensure the deposit of cost of short fallen quantity into Government treasury by Mr. Usman Khan FGS Incharge PRC Booni/Kushum with in one weak positively.


District Food Controller,
Chitral.

ATTESTED

Usman Khan FGS. (notice)-II




District Food Controller,
Chitral

ATTESTED

-14-

~~Amir~~

24

OFFICE OF THE DISTRICT FOOD CONTROLLER CHITRAL

No. 1591 /Usman Khan FGS.
To,

Dated Chitral the 10 /06/2014.

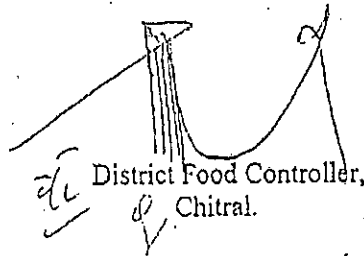
The Director Food,
Khyber Pakhtunkhwa,
Peshawar.

Subject: - RECOVERY OF GOVERNMENT DUES.
Memo:-

Kindly refer your No.3482/ET-660-Enquiry-2013, dated 04/06/2014.

2. In this connection it is submitted that during physical verification carried out in the current financial year a quantity of 789 bags 78.900 M.Ton wheat valuing Rs.2761500/- was short detected against Mr. Usman Khan FGS / Incharge PR Centres Booni and Mastuj. The recovery process immediately started and an amount of Rs.350000/- on account of cost of wheat / empty gunny bags recovered from the official and deposited into Government treasury through proper challan living behind, a balance of Rs.2411500/-. The official was served last notice with the direction to deposit the remaining balance into Government treasury and produce original treasury challan within one week time, but he was unable to deposit the outstanding amount.

3. In view of the above facts it is submitted that the case may kindly be forwarded to Director Anti Corruption Establishment Khyber Pakhtunkhwa Peshawar for further necessary action.


District Food Controller,
Chitral.

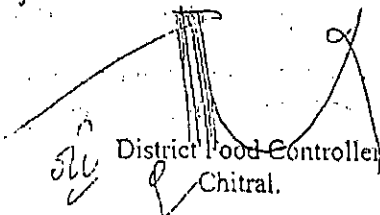
No. 1592-95 /Usman Khan FGS,

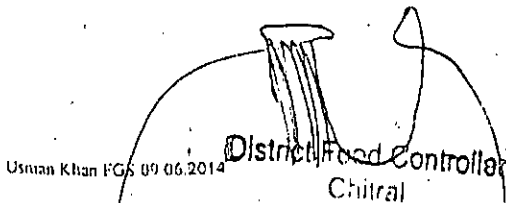
Dated Chitral the 10 /06/2014.

Copy forwarded to:-

1. District Food Controller Khyber Pakhtunkhwa for information, please.
2. District Secretary Food Government of Khyber Pakhtunkhwa for information of the Honorable Secretary Food.
3. The Assistant Director Food Malakand Division at Saidu Sharif Swat for information.
4. Assistant Food Controller Mastuj at Booni for information and necessary action.

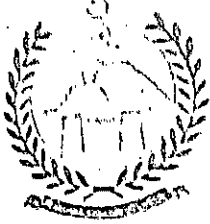
ATTESTED


District Food Controller,
Chitral.


District Food Controller,
Chitral

Usman Khan FGS 09 06.2014

ATTESTED



FOOD DIRECTORATE
KHYBER PAKHTUNKHWA,
PESHAWAR

No. 6333 /PI-1123

Dated 06/11/2014

~~15~~ -15- 842
[Handwritten signature]

SHOW CAUSE NOTICE

I Muhammad Anwar Khan Director Food Khyber Pakhtunkhwa being competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby serve Mr. Usman Khan Foodgrain Supervisor Incharge of PRCs Bomal and Kushum at District Chitral as follows:

- a) The District Food Controller, Chitral reported vide letters No.1551-53/Usman Khan dated 06-06-2014, No. No.1551-65/Usman Khan dated 06-06-2014, No.1391/Usman Khan (CG), dated 10-06-2014 and cancel order No.2533-39/4/3-ET, dated 02-10-2014 (copy enclosed) that during physical verification carried out in the current financial year a quantity of 709 bags (78.9) M. Tons wheat valuing Rs.2761500/- was short detected against Mr. Usman Khan Foodgrain Supervisor Incharge Provincial Reserve Centres Bomal and Kushum. An amount of Rs.350000/- on account of cost of wheat/ empty gunny bags has been recovered from you and deposited into Government treasury through proper Challan leaving behind, a balance of Rs.2411500/- You were served last notice by the DFC Chitral with the direction to deposit the remaining balance into Government treasury and produce Original treasury Challan within one week time, but you have failed to deposit the outstanding amount.
- b) The District Food Controller Chitral has worked out the cost of wheat on the basis of issue price i.e. 3500 per bags however the landed cost of the embezzled quantity at the present rate comes out to be Rs.3.353 Million out of which the accused has deposited Rs.0.35 Millions while Rs.3.003 Millions are still outstanding against you.

On going through the material on record provided by the DFC Chitral, I am satisfied that you have committed the above etc/omissions specified in rule-3 of the said rules.

2. As a result thereof, the under signed being competent authority, have tentatively decided to impose upon you the Major Penalty i.e. Removal from Service under rule (d) (b) (iii) Efficiency & Discipline Rules 1973 amended/ revised 2011.

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

4. If no reply to this notice is received within seven days, it shall be presumed that you have no reply to put in your defence and in that case an ex-parte action shall be taken against you.

He has the copy reviewed in name of removal the official? 17/11/14

[Handwritten Signature]
DIRECTOR FOOD
KHYBER PAKHTUNKHWA,
PESHAWAR

2871
17-11-14
USMAN KHAN

[Handwritten Signature]
District Food Controller

~~Annex-III~~ (3)



FOOD DIRECTORATE
KHYBER PAKHTUNKHWA,
PESHAWAR

No. 6793 /PF-1039
Dated Peshawar the 21 /11/2014

10

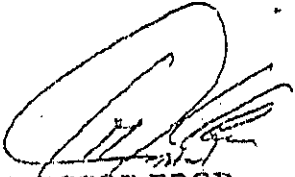
Mt. Usman Khan FCS
Office of District Food Controller,
Chitral.

Subject: SHOW CAUSE NOTICE / PERSONAL HEARING
Memo

Reference this Directorate Show Cause Notice No.6533/PF-1123 dated 06-11-2014 on the subject noted above.(Copy enclosed)

2 You were directed to submit the reply to the Show Cause Notice as noted above within 07 days, but you have failed to submit the reply of the Show Cause Notice till date.

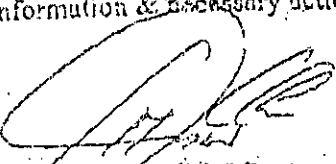
3 You are directed to appear before the competent authority along with reply to the Show Cause Notice for personal hearing on 27/11/2014 to proceed further action in the matter.

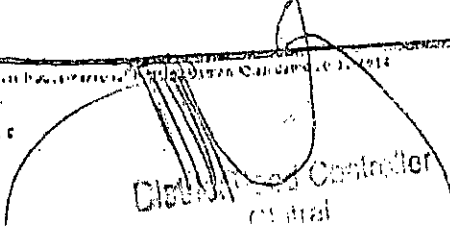

DIRECTOR FOOD
KHYBER PAKHTUNKHWA,
PESHAWAR.

Endorsement No & Date Even


Copy to be forwarded to

- 1) The Assistant Director Food Malakund Division at Saidu Sharif Swat for information & necessary action.
- 2) The District Food Controller, Chitral for information & necessary action.


DIRECTOR FOOD
KHYBER PAKHTUNKHWA,
PESHAWAR.


District Food Controller
Chitral

00-11 11/05/2014





FOOD DIRECTORATE
KHYBER PAKHTUNKHWA,
PESHAWAR

No. 1258 /PF-1039
Dated Peshawar the 27 /02/2015

~~Amir Khan~~

-17-

24

TO

Mr. Usman Khan FGS,
Office of District Food Controller,
Chitral.

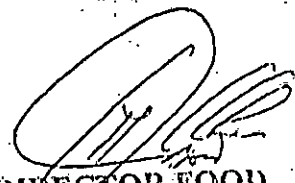
Subject:- SHOW CAUSE NOTICE / PERSONAL HEARING
Memo

Reference this Directorate letter No.6533/PF-1123 dated 06-11-2014, No. 6993/PF-1123 dated 21-11-2014 and 6958/PF-1039 dated 09-12-2014, on the subject noted above

2 You are directed to appear before the competent authority along with reply to the Show Cause Notice for personal hearing on 19/03/2015 to proceed further action in the matter.

ATTACHED

District Food Controller
Chitral

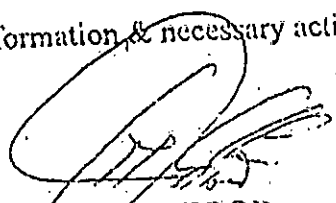

DIRECTOR FOOD
KHYBER PAKHTUNKHWA,
PESHAWAR.

Endorsement No & Date Even

Copy is forwarded to

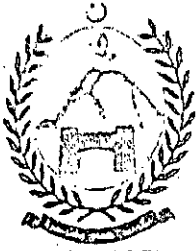
- 1) The Assistant Director Food Maiakand Division at Saidu Sharif Swat for information & necessary action.
- 2) The District Food Controller, Chitral for information & necessary action.

2974
12.3.15
Usman Khan
H/C


DIRECTOR FOOD
KHYBER PAKHTUNKHWA,
PESHAWAR.

*He the official may be
by email & the letter may
delivered by getting my
acknowledgment
phoned*

ATTACHED



OFFICE ORDER

FOOD DIRECTORATE,
KHYBER PAKHTUNKHWA
PESHAWAR

No. 2037 /PF-1123

Dated 21/04 2015

Amex - XI

18-

24

Where as the District Food Controller, Chitral reported vide letters No.1554-58/Usman Khan dated 06-06-2014, No. No.1561-65/Usman Khan dated 06-06-2014. No.1591/Usman Khan FGS, dated 10-06-2014 and office order No.2535-39/4/3-ET, dated 02-10-2014 (copy enclosed) that during physical verification a quantity of 789 bags (78.9) M. Tons wheat valuing Rs.2.76 Million was short detected against Mr. Usman Khan Foodgrain Supervisor Incharge Provincial Reserve Centres Booni and Kushum. An amount of Rs.350000/ on account of cost of empty gunny bags has been recovered from the official and deposited into Government treasury through proper Challan leaving behind, a balance of Rs.2411500/-. He was upon with notice by the DFC Chitral to deposit the remaining balance into Government treasury and produce Original treasury Challan, but he have failed to deposit the outstanding amount.

2 The District Food Controller Chitral has worked out the cost of wheat on the basis of issue price ie. 3500 per bags however the landed cost of the embezzled quantity comes out to be Rs.3.353 Million out of which the accused has deposited Rs.0.35 Millions while Rs.3.003 Millions are still outstanding against you.

3 Mr. Usman Khan Foodgrain Inspector (incharge of PRC Booni & Kushum Chitral) was served with Show Cause Notice vide Food Directorate letter No. 6533/PF-1123 dated 06-11-2014, No. 6793/PF-1039 dated 21-11-2014 and No. 1258/PF-1039 dated 27-02-2015, for appearance before the competent authority along with reply to the Show Cause Notice for personal hearing on 19-03-2015 to proceed further but he not only failed to appear before the authority to be heard in person, depositing the outstanding amount but rather absented himself from the office.

4 After full consideration of the case, the said official is held responsible for embezzlement/ misappropriation of 789 bags (78.9 Tons wheat costing Rs.3.003 Millions, ill discipline and hereby awarded the major penalty of removal from service with immediate effect.

5 The embezzled/ misappropriation quantity which are still outstanding against him will be recovered from his moveable/ immovicable property as per Rules.

[Signature]
DIRECTOR FOOD
KHYBER PAKHTUNKHWA,
PESHAWAR

*Ac/Act
for further in lp.
Also please in
recovery for B-8/5/15*

Enderts of even No & Date

Copy is forwarded to:-

- 1 The Deputy Commissioner Chitral.
- 2 The Director Anti-Corruption Establishment Khyber Pakhtunkhwa Peshawar.
- 3 The District Accounts Officer Chitral.
- 4 The District Revenue Officer Chitral
- 5 The Assistant Director Food Malakand Division at Saidu Sharif Swat.
- 6 The Circle Officer Anti-Corruption Establishment Chitral.
- 7 The District Food Controller Chitral.
- 8 Mr. Usman Khan FGS Chitral.
- 9 Personal File.

ATTACHED

[Signature]
DIRECTOR FOOD
KHYBER PAKHTUNKHWA,
PESHAWAR

NO.	3071
DATE	8.5.15
	USMAN

Office Order for removal from service Usman Khan FGS dated 19/03/2015

[Signature]
District Food Controller
Chitral



-19-

Annex - XII

FOOD DIRECTORATE
KHYBER PAKHTUN KHWA,
PESHAWAR

No. 5577 /PE-1123

Dated 16 /1 /2014

The Director, Anti Corruption,
Establishment, Government of
Khyber Pakhtunkhwa,
Peshawar

Subject: RECOVERY OF GOVERNMENT DUES AGAINST MR. USMAN KHAN
FOODGRAIN SUPERVISOR CHITRAL

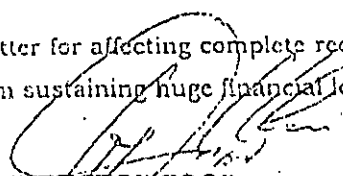
The District Food Controller, Chitral reported vide letters No.1554 58/Usman Khan dated 06-06-2014, No. No.1561-65/Usman Khan dated 06-06-2014, No.1591/Usman Khan dated 10-06-2014 and office order No.2535-39/4/3-ET, dated 02-10-2014. Copies enclosed

The District Food Controller, Chitral reported that during physical verification carried out in the current financial year a quantity of 789 bags (78.9) M. Tons wheat valuing Rs.2701500/- was short detected against Mr. Usman Khan Foodgrain Supervisor Incharge 3 Provincial Reserve Centres Boom and Kushum. The recovery process immediately started and an amount of Rs.350000/- on account of cost of what/ empty gunny bags recovered from the offend and deposited into Government Treasury through proper Challan leaving behind, a balance of Rs.2411500/- The accused official was served last notice by the DFC Chitral with the direction to deposit the remaining balance into Government treasury and produce Original treasury Challan within one week time, but he was unable to deposit the outstanding amount.

The District Food Controller Chitral has worked out the cost of wheat on the basis of issue price i.e. 3500 per bags however the landed cost of the embezzled quantity at the present rate comes out to be Rs.3.353 Million out of which the accused has deposited Rs.0.35 Millions while Rs.3.003 Millions are still outstanding against him.

The official has been given ample time to deposit the outstanding liabilities due against him but he failed to comply with.

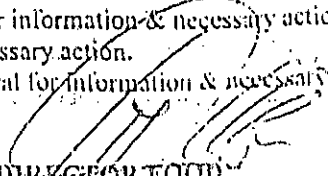
It is therefore requested to investigate the matter for affecting complete recovery from the official so as to save the Government exchequer from sustaining huge financial loss.


DIRECTOR FOOD
KHYBER PAKHTUNKHWA,
PESHAWAR.

Endorsement No. & Date Even

Copy is forwarded to

- 1) PS to Minister Food for information of the Minister Food Khyber Pakhtunkhwa
- 2) PS to Secretary Food for information of the Secretary Food Government of Khyber Pakhtunkhwa Food Department Peshawar.
- 3) The Assistant Director Food Malakand Division at Saidu Sharif Swat.
- 4) The Circle Officer Anti-Corruption Establishment Chitral for information & necessary action.
- 5) The District Food Controller, Chitral for information & necessary action.
- 6) Mr. Usman Khan Foodgrain Supervisor Office of DFC Chitral for information & necessary action.


DIRECTOR FOOD
KHYBER PAKHTUNKHWA,
PESHAWAR.

10/11/2014

No 59-56-135
dl71214117

90

اسپیکر جنرل پولیس سرسید ناہنہ نمبر ۵۰-۲۰۰۰

Seen

ACE

ابتدائی اطلاعی رپورٹ

فائل: ابتدائی اطلاعیت برسر تاجن دست اندازی پولیس رپورٹ شدہ زیر رقم ۱۵ بجوہ ضابطہ فوجداری
تعداد انٹی لہریشن جرنل
محل جرنل
تاریخ وقت وقوعہ شمال 2014ء وقت تا حیلیم -
نمبر (2)

1	تاریخ وقت رپورٹ 16/04/14 دستری اوقات چاکیدگی پرچہ 12/4/14 وقت 09.00ء
2	نام دستکرت اطلاع دہندہ دستکرت: شریفیاض سابتہ DF، محکمہ خوراک جرنل
3	مقرر کیفیت برسر (مرد لوہ) خان اگر گویہ لیگی ہو
4	جائے وقوعہ ناصلہ تھانہ سے اور سمت PR سنہا بیونی، کٹھ کینا واسلہ کرید 75 اور 85 کلومیٹر جانب شمال از وطن ACE کول
5	نام دستکرت ملزم عثمان خان فرزند گریبا بیوی، کٹھ کینا خوراک جرنل - گروہ (6)
6	کارروائی بر تلبش کے متعلق کی گئی اطلاع درجہ کرنے میں ترقف ہوا ہو تو وجہ بیان کرے۔
7	تھانہ سے روانگی کی تاریخ وقت بند کٹھ نکس و خوراک

ابتدائی اطلاعیت درجہ مذکورہ بالا کی شکایت پر تشکیل دی گئی
نمبر 58171/PF-1123 برسر 16/04/14 تاریخ خوراک جرنل کے نام سے رقم 789 لہری
وزن 78.9 کلو گرام مالیت تمام 2761500 روپے ریاضا شدہ PR کو الزام دیا جلا عثمان خان
نے چارج دیے وقت خوراک جرنل کے نام سے رقم 789 لہری ان کے پاس 14 لہری
10270/ACE برسر 11/04/14 شروع کر کے متعلقہ دست اندازی میں کٹھ کینا 14 لہری
مقرر کیفیت شاہ صاحب ایڈیٹ انسپشن کر کے حکومت کو شکایت کی کہ میں نے اپنے والی عثمان صاحب کو
10249-53/ACE برسر 2/04/14 مقررہ کر کے مالیت 2761500 روپے مالیت
قرضہ کیلئے جس کے گندم اور ظالی بر دیاں شکل ستیا قیلتہ 3033715 روپے واجت الزامین
ملازم کے خدوں میں کٹھ کینا انکوارڈینا کر کے ملازم سے بھی پھنایا گیا ہے ملازم کے خدوں میں کٹھ کینا
کے برسر 10270/ACE کا کٹھ کینا ڈاؤن کٹھ کینا ACE شاید لہری ACE 4882/ACE برسر 17/04/14
ملازم کے خدوں میں متدد رجسٹر کرنے اور گرفتاری کا حکم صادر کرنے کے لئے ملازم عثمان خان سابتہ فرزند گریبا
PR کوئی کٹھ کینا ظالی برسر کٹھ کینا مالیت 3033715 روپے فرزند گریبا کا پاداش میں ملزم
وقت کیا جائے دوران تلبش اگر گویہ کر کے شہنشاہ ملزم پاداش کر کے خدوں میں ملازم کا پاداش میں ملزم
کے تمام کٹھ کینا خدوں میں آگے برسر ان کے بالا کر کے کٹھ کینا ملازم کے خدوں میں ملازم کا پاداش میں ملزم
ہوں - پرچہ گزارش 12/4/14

ATTESTED
12/4/14

District Food Controller
Chitral

Statement Recorded before
Inquiring officer in case of
Charge sheet/ statement of
allegation against Mr: Usman Khan
Pd: Food Grain Supervisor

I, Sher Faraz Khan District Food
Controller Nowshah Chitral do
hereby record my statement
before Inquiring officer today
on 22.4.2022.

① During my tenure as District
Food Controller, physical verification
of PRC Booni and PRC Kushom
carried out vide No 1093-99/11-AC
dated 16.4.2014. Physical verification
carried ^{out} by Mr: Asad Hussain
Assistant Food Controller and
Riaz Ahmad Food Grain Inspector

② During physical verification short
of wheat found E.g bags detected
amounting to Rs 3033715/-

③ The Incharge of both PRCs Mr:
Usman Khan since and again
directed by DFC Chitral to deposit
the said amount into Govt: Treasury

ATTESTED

but he was reluctant and unfortunately remained failed to deposit the same

(4) Matter on his case was referred to Anti-Corruption and FCR was lodged against him for recovery of the said Government outflow

(5) At present, the said case is under trial in the Anti-Corruption court and next hearing date is fixed on 13/5/2022.

(6) The undersigned remain present in each and every date of hearing.

At least but not atleast the Ex: Official has only recovered RS 350000/-

SARAYAN K
DISTRICT FOOD CONTROLLER
LOWER CHITRA

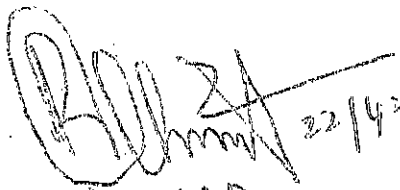
~~ARRESTED~~

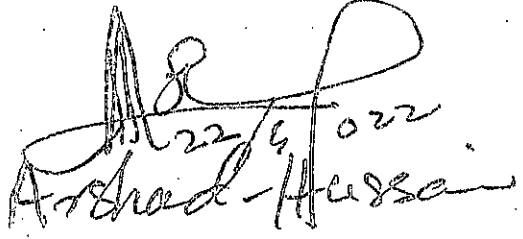
~~Annex - XV~~


-23-

BREFING REGARDING USMAN KHAN EX-INCHARGE PRC BOONI/KUSHUM.

On the order of DFC Chitral, vide No.1093-99/1/1-AC dated 16/04/2014 I Mr. Arshad Hussain Assistant Food Controller Chitral along with Mr. Riaz Ahmed FGI of the office of DFC Chitral, conducted physical verification of the PRC Booni and Kushum. In light of physical verification of the said Godowns, the shortage of wheat and E.G bags was detected amounting to Rs.3033715/-. He was time and again directed by the DFC Chitral to deposit the said amount into government treasury, but he was reluctant and unfortunately remained failed to deposit the same. Later on his case was referred to Anti-Corruption department Chitral and FIR was lodged against him for the recovery of the said amount. At present, the said case is under trial in the Anti-Corruption court Swat, next hearing date is fixed as 13/05/2022. It is worth mentioning here that the case is v attended by the undersigned in every date as fixed by the court. (relevant documents are attached).


Riaz AHMAD
AFC Lower Chitral
22/4/22


Arshad Hussain
District Food Controller,
Upper Chitral.


2022/4/22

To,

Mr. Hafeez ur Rehman (Inquiry Officer)
Asstt: Director (Litigation)
Directorate of Food
Govt of KPK, Peshawar

Subject: REPLY TO CHARGE SHEET

Respected Sir,

1. That undersigned had been issued charge sheet No 1461/PFZ-1123 dated 05.04.2022 received by hand on 20.04.2022 vide memo No 1598/C-06(ST) wherein the undersigned has been directed to appear with statement and relevant record.

2. That undersigned strongly rebut the charge sheet and statement of allegations with following reasons:

- (i) That I was transferred to PRC Booni and Kushum in August 2011. At this venue the Godown premises was an old building with damage walls and roof less exposed to nature and animal creatures. There was no proper management system available so much so even the measurement / weightage equipments were not available. It was common practice that new consignments were placed upon the old ones. As a result thereof the gunny bags were either rusted or crashed. There were no extra gunny bags available nor any men power was there to repute the wheat into the bags.

~~Amra - XVI~~
-24-
ATTESTED

This practice and problem was in vague since decades.

- (ii) I was newly and freshly appointed and was never undergone any training nor any guidance for my assignment. As a result thereof I was handed over the Godowns without any physical weight or handing over by the undersigned in presence of my boss AFC Booni namely Arshad Hussain, hence I cannot be blamed for the shortage of wheat.
- (iii) Similarly alleged detection of 789 bags is also incorrect and not as per actual record. Similarly the cost of 350000 has been deposited against actual sale of 100 bags available at that time it will not be out of place to mention here that the all. Infact I have been trapped due to fresh untrained appointment / assignment and being outsider transferred to Chitral Valley as all the persons posted in the office were locals and belong to Chitral.
- (iv) The alleged calculations of 3500 per bags is also incorrect based on whims and conjectures. The alleged calculations as well as price too are incorrect and without any support of record with landed cost.

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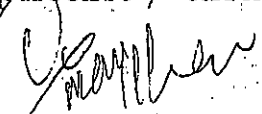
- (v) The alleged quantity of the shortage of wheat its weight, and No;s of bags are incorrect and without any support of documents / record.
- (vi) That the Applicant was neither associated in any proceedings during the physical verification at site nor was ever invited or asked to join. The alleged calculations facts mentioned in the charge sheet and statement of allegations are baseless, fabricated, one sided and untenable in the eyes of law.
- (vii) That Applicant is innocent, falsely implicated in the whole affair with melafide intention and is required to be exonerated all back benefits.
- (viii) That Applicant has never been provided copies of the any official record of incriminating material so that Applicant put at more defence.
- (ix) The Applicant after assuming charge had also inform the office about the site situation and physical shortages.
- (x) The office has never conducted any physical verification at site neither prior to the assumption of charge, nor even after assumption of my charge.
- (xi) The calculation given in the charge sheet is exorbitant, exaggerated by adding extra amount in

Attest the office and the site situation and
 [Signature]

the said quantum of money which is beyond the legal authority.

- (xii) The amount so calculated is again incorrect as the concerned officer has failed to clarify and add the actual cost of auction poor damaged quality wheat and its gunny bags, this aspect requires the attention of the worthy inquiry officer.
- (xiii) It will not be out of place to mention here that undersigned has been pressurized by the AFC Booni and DFC Chitral for dire consequences.
- (xiv) Since short time has been given therefore the undersigned will require time to annex few supporting documents relating to reports and letters sent to the high ups about the situation which are available on the record and shall be produced accordingly.
- (xv) That Applicant would like to be heard in person. It is therefore requested that the charges against the Applicant in the charge sheet and statement of allegations may graciously be dropped and Applicant be exonerated from the charges and be also allowed to serve along with the grant of all back service benefits.

Applicant / undersigned


USMAN KHAN
FGS, Booni & Kushum
Chirtal Upper.

APPROVED

Amir XVII


28-

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OFFICE OF THE DISTRICT FOOD CONTROLLER, PRC JIJIAL

OFFICE ORDER

In order to have the factual position of stock of wheat, Mr. Arshad Hussain Assistant Food Controller Mastuj and Mr. Riaz Ahmad Foodgrain Inspector are hereby constituted to conduct physical verification of wheat at PR Centre Booni and Kushum. They are directed to submit their authentic report regarding stock of wheat and other deal articles to the undersigned within seven days positively.


District Food Controller,
Chitral.

No. 1093-99 11/1-AC.

Dated Chitral the 14 /04/2014.

Forwarded to:-

1. The Director Food Khyber Pakhtunkhwa Peshawar for information, please.
2. PS to Minister Food Khyber Pakhtunkhwa for information of the Minister Food.
3. PS to Secretary Food for information of the Hon'able Secretary Food Government of Khyber Pakhtunkhwa.
4. The Assistant Director Food Malakand Division at Swat for information.
5. Mr. Arshad Hussain AFC Sub Division Mastuj for information.
6. Mr. Riaz Ahmad Foodgrain Inspector for information.
7. Mr. Usman Khan Foodgrain Supervisor incharge PRC Booni & Kushum for information & necessary action.


District Food Controller,
Chitral.

ATTESTED

Office order-II


District Food Controller,
Chitral

ATTESTED

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23/4
1014

مخانب : ارشد حسین اے این ٹی سب ڈویژن منسوج
ریاض احمد خٹہ انسٹیٹیوٹ ڈی این ٹی افسر جنرل

خدمت جناب ڈسٹرکٹ فوڈ کنٹرولر صاحب جنرل

سکون : - - - - -
ریجنل ڈیپارٹمنٹس رپورٹ پی آر سیکٹر یونی

یادداشت :- بحوالہ ایڈ کے لٹر نمبر 1093-99/1/1-AC مورخہ 16 اپریل 2014
دائیں رپورٹ عرض ہے -

جناب عالی! ایڈ کے حکم پر مورخہ 22 اپریل 2014 کو پی آر سیکٹر یونی کا
فریکل ڈیپارٹمنٹس کیا گیا۔ نفعی درجہ ذیل ہیں -

✓	1968	بیک بیلنس
	812	
✓	1968	نقل اسٹاک
	480	اپریل 2014 تک
✓	1488	بقیہ اسٹاک
✓	713	نگراؤنڈ بیلنس
	775	غزق / کس

The exchange PKI Bazaar may be described
to deposit the small quantity within one week
otherwise submit within against him. A/c (or) may
also be directed to procure the successful people keep close
watch on D. and M. on 2.0.14.

ہذا رپورٹ عمداً مناسب کارروائی پیش خدمت ہے (بیان حلفی ہے)

ریاض احمد
ڈی این ٹی افسر جنرل

ATTESTED

District Food Controller

23-4-2014
ارشد حسین

ATTESTED

23/4/14

مقامی حکومت چترال

ذرائع انسانی

ذرائع انسانی

ذرائع انسانی

ذرائع انسانی

ذرائع انسانی

38	30/3/14
303	21/4/14
791	کل اسٹاک
400	ایشور 22/4/14 تا
391	بقیمہ اسٹاک
377	مگر ایلڈ بیلنس
14	فرق / کمی

There have order to demont... produce original... challenge within 15 days... action will be taken against him.

ATTACHED

ذرائع انسانی

District Food Controller Chitral

ATTACHED

~~Amir~~

258

(12-31-

OFFICE OF THE DISTRICT FOOD CONTROLLER CHITRAL

No. 1145 /Usman Khan FGS,

Dated Chitral the 23 /04/2004.

To.

Mr.Usman Khan FGS,
Incharge PRC Booni,
Kushum.

Subject: - PHYSICAL VERIFICATION REPORT.
Memo:-

During physical verification of wheat at PR Centres Booni & Kushum by Mr.Arshad Hussain Assistant Food Controller Incharge Sub Division Mastuj and Mr.Riaz Ahmad Foodgrain Inspector Chitral on 21, 22/04/2014, the following quantity of wheat have been short detected against you in the above PR Centres as detail given below:-

S.No.	Name of Centre	Book Balance	Ground Balance	Difference / short detected
01	Booni	1488 Bags	713 Bags	775 Bags
02	Kushum	391 Bags	377 Bags	14 Bags

You are hereby strictly directed to deposit the cost of above mentioned short detected quantity into Government treasury within one week and produce original treasury challan to this office, other wise strict action will be taken against you.

... be treated most important.

[Signature]
District Food Controller
Chitral.

No. 1146-50 /Usman Khan FGS,

Dated Chitral the 23/04/2014.

Copy forwarded to:-

1. The Director Food Khyber Pakhtunkhwa Peshawar for information, please.
2. PS to Minister Food Khyber Pakhtunkhwa for information, please.
3. PS to Secretary Food Government of Khyber Pakhtunkhwa for information of the Hon'able Secretary Food.
4. The Assistant Director Food Malakand Division at Saidu Sharif Swat for information.
5. Assistant Food Controller Incharge Sub Division Mastuj with the direction to ensure the recovery Government dues and keep close watch on receipt / issue of wheat at PR Centre Booni & Kushum.

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23/4/14

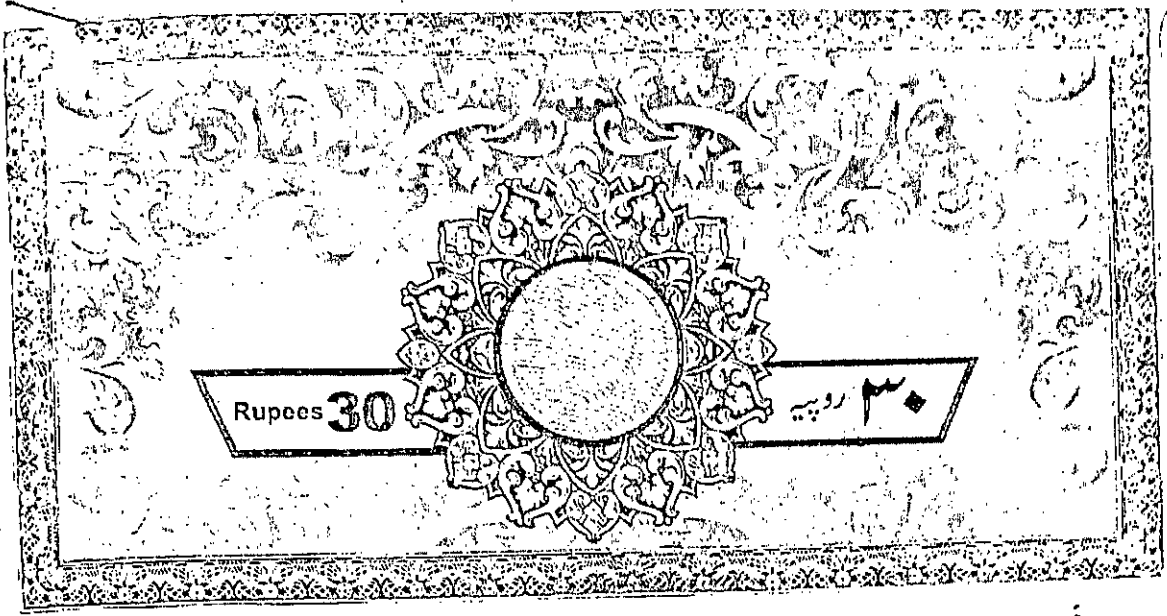
[Signature]
District Food Controller,
Chitral.

ATTESTED

District Food Controller
Chitral

ATTESTED

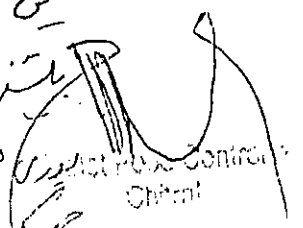
777852



افکار نامہ

Attested
22/11/14

منگہ عثمان خان دکن کین خان سے کندہ پتھان حفیظ قحط بانی ضلع مرادان خیر پور ضلع
 عاقبہ مسلم۔ اس وقت آئی لٹرائی سوشل ورکشاپ کے ایگزیکٹو ایگراہ کے غیر
 محترموں۔ کہ میں بحالت گودام کلرک ٹوٹی گودام میں ڈیوٹی انجام دے رہا ہوں۔
 میں صرف 21 اپریل 2014 کو گودام کا انسپکشن ہوا۔ انسپکشن میں مارچ 2014
 میں 1968 جو کہ موٹورہ اسٹاک 713 پوری ہے۔ جبکہ اپریل 2014 میں 480/2
 جنکا مافی وزن 48000 اور موٹورہ قیمت 1680000/2 سرکاری فنانس
 جمع کرے۔ باقی سبزہ 775 پوری ہے۔
 میں 775 پوری حیدرآباد سے گاری فنانس میں جمع کروانگا جنکا موٹورہ قیمت 16
 کو جمع کروانگا اور حالانکہ دفعہ ہذا میں جمع کرنے پر آمادہ نہیں ہے۔
 لہذا افکار نامہ تحریر کیا جاتا ہے تاکہ اس کے بارے میں
 سوال کیا جا سکے۔



اللہ عثمان خان

شناختی نمبر 16102-8593959-7

P.R.C. 5
22/11/14

22/11/14

(15)

GS&PD, NWFP--1420 Du, Food 2000 P, of 100--20-5-91--(10)

Food Account--II.

CHALLAN No.

(Wheat/Sugar)

Challan of Cash paid into State Bank of Pakistan, Peshawar.

R. G. Bani

To be filled by the Receiver

To be filled by the Department Officer Treasury.

By whom tendered	Name and designation on whose behalf money is paid	Particulars		Rate	Amount	Particulars
		Name of commodities	Weight			
1	2	3	4	5	6	7
13 man Khaw P.R.C. Boori D.P.C. Chitral	D.P.C. Chitral	Wheat	100			1. 1170--STR-- Outlay
		Wheat Atta	125	125/-	12,500/-	(a) 1121--STR--Whe
		Rice	B.100			(b) 1123--STR--Sug
		Maida				(c) 1120--STR--Out
		Barley				
		Gram				
		Total				12,500

In words (Rupees) Twelve Thousand Five Hundred and No Paise only

Received Payment (Rupees) _____ Account at _____ Date _____

Treasurer: _____

MANAGER, State Bank of Pakistan, Peshawar
Treasury Officer, Peshawar.

ATTESTED

Distt. Food Controller
Chitral