

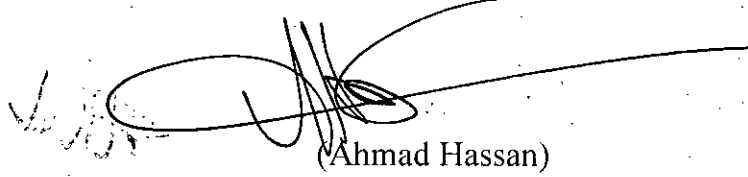
Order

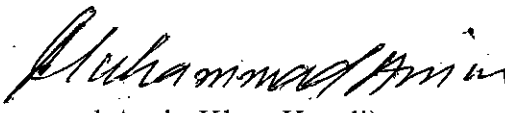
06.12.2018

Counsel for the appellant present. Mr. Asad Jan Durrani, Legal Advisor for respondents no. 3 and 4 alongwith Mr. Muhammad Riaz Khan Paindakhel, Asst: AG for official respondents and present. Arguments heard and record perused.

This appeal is also dismissed as per detailed judgment of today placed on file in connected service appeal No. 1226/2015 titled "Sajawal Khan-vs- The Govt: of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar and three others". Parties are left to bear their own cost. File be consigned to the record room.


Announced:
06.12.2018


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

Service Appeal No. 1226/2015

18.09.2018 Appellant with counsel present. Mr. Kabirullah Khattak, Additional AG for respondents 1 & 2 and Mr. Asad Jan Durrani, Advocate for respondents No. 3 & 4 present. Requested for adjournment. Adjourned. To come up for arguments on 19.10.2018 before D.B.


(Hussain Shah)
Member

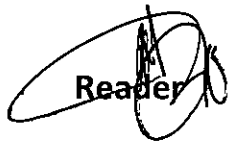

(M. Amin Khan Kundi)
Member

19.10.2018 Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Counsel for the appellant seeks adjournment. Adjourned. Case to come up for arguments on 09.11.2018 before D.B.


(Hussain Shah)
Member


(Ahmad Hassan)
Member

09.11.2018 Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 06.12.2018.


Reader

30.08.2018


Appellant with counsel and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. At the very outset of hearing learned Deputy District Attorney raised objection on the maintainability of the present appeal, as the appellant was not a civil servant. Attention was invited to Section-22 of Khyber Pakhtunkhwa Emergency Rescue Act, 2012, whereby all the employees have been declared as to be Public servants within the meaning of Section -21 of Pakistan Penal Code, 1860. Subsequently these employees were regularized under Section-23 of the said act. Both the learned counsel for the appellant and learned Deputy District Attorney are directed to produce documentary evidence through which it can be established that employees of Rescue 1122 are the civil servants or otherwise. To come up for record and arguments on 11.09.2018 before D.B.


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

11.09.2018

Learned counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents No.1 & 2; learned counsel for respondents No.3 & 4 also present. Learned counsel for respondents No.3 & 4 seeks adjournment. Adjourned. To come up for arguments on 18.09.2018 before D.B.


(Hussain Shah)
Member


(Muhammad Hamid Mughal)
Member

Post Script
27.06.2018

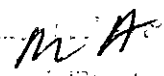
In the meanwhile learned counsel for respondents No. 3 & 4 appeared and submitted application for setting-aside ex-parte proceedings initiated against respondents No. 3 & 4. Application allowed. Ex-parte proceeding initiated against respondents No. 3 & 4 is hereby set-aside. To come up for arguments on the date already fixed.

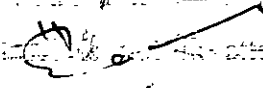

(Muhammad Amin Kundi)
Member


(Muhammad Hamid Mughal)
Member

17.08.2018

Junior to counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Junior to counsel for the appellant seeks adjournment as senior counsel is not in attendance. Adjourned. To come up for arguments on 30.08.2018 before D.B. Khan

18.08.2018
Junior to counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General present. Junior to counsel for the appellant seeks adjournment as senior counsel is not in attendance. Adjourned. To come up for arguments on 30.08.2018 before D.B. Khan

(Muhammad Amin Kundi)
Member


(Muhammad Hamid Mughal)
Member

(Muhammad Amin Kundi)
Member

(Muhammad Hamid Mughal)
Member

04.04.2018

Counsel for the appellant and Addl; AG for respondents present. Counsel for the appellant is directed to submit member copy of the instant appeal. Counsel for the appellant seeks adjournment. Adjourned. To come up for record and arguments on 10.04.2018 before D.B.



(Ahmad Hassan)



(M. Hamid Mughal)

11.04.2018

Member Clerk to counsel for the appellant and Mr. Kabir Ullah Khattak, learned Additional Advocate General present. Adjourment requested. adjourn. To come up for arguments on 27.04.2018 before D.B



(Ahmad Hassan)

Member



(Muhammad Hamid Mughal)

Member

27.04.2018

Junior counsel for the appellant and Mr. Zia Ullah, DDA for the respondents present. The Tribunal is non functional due to retirement of the Honorable Chairman. Therefore, the case is adjourned. To come up for the same on 27.06.2018 before D.B.

Reader

27.06.2018

Appellant with counsel and Mr. Riaz ahmad Paindakhail, Assistant AG for respondent No. 1 & 2 present. Case called several time but no one present on behalf of respondents No. 3 & 4 hence, they placed ex-parte. To come up for arguments on 16.08.2018 before D.B.



(Muhammad Amin Kundi)

Member

(Muhammad Hamid Mughal)

Member

06.11.2017

Appellant in person present. Mr. Usman Ghani, District Attorney for the respondent No. 1 also present. None present on behalf of respondents No. 2 to 4 therefore, fresh notice be issued to respondents No. 2 to 4 for attendance. Appellant also requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for attendance of respondents No. 2 to 4 and arguments on 15.01.2018 before D.B.



(Gul Zeb Khan)
Member


(Muhammad Amin Khan Kundi)
Member

15.01.2018


Clerk of the counsel for appellant present. Mr. Riaz Pinda Khel, Assistant AG for the respondents present. Lawyer community on strike on the call of Khyber Pakhtunkhwa Bar Council. Adjourned. To come up for arguments on 15.03.2018 before D.B.



(Gul Zeb Khan)
Member


(M. Hamid Mughal)
Member

15.03.2018

Learned counsel for the appellant present. Learned District Attorney on behalf of official respondents present. Learned counsel for private respondents present and seeks adjournment. Adjourned by way of last chance. To come up for arguments on ~~15.03~~ 15.04.2018 before D.B.


(Muhammad Amin Kundi)
Member


(Muhammad Hamid Mughal)
Member

Before the Service Tribunal KP, Peshawar
Bakhtawan VS Rescue 1122

27/6/2018 Application for setting aside
Ex parte proceedings.

Respectfully Sheweth,

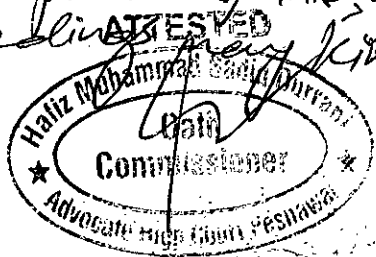
- (1) That the instant case is/was fixed before this Hon'ble Court/Tribunal for today i.e 27-06-2018.
- (2) That the instant case was fixed for arguments for today and the counsel for the Respondent No 3 and 4 was busy before the Hon'ble Peshawar High Court, Peshawar in a case titled as "Nabeel Ahmad VS Govt of KP" and after becoming free from Hon'ble High Court rushed to this Hon'ble Service Tribunal around 11:30 am but was informed in the Tribunal that Respondent No 3 and 4 has been proceeded Ex parte by this Hon'ble Tribunal.
- (3) That it is pertinent to mention here that the available Rights of the Govt Department are attached with the instant case.
- (4) That the application is well in time and even after 15 minutes of passing Ex parte Order/Ex parte Proceeding order on the same day i.e 27-06-2018.

It is therefore, very humbly prayed on acceptance of this application that the ex parte proceedings may kindly be set-aside.

Applicant/Respondent 3 & 4
Through Asad Jan Durran Advocate


Affidavite

As per instruction of my client, the contents of this application are true & correct



28.02.2017

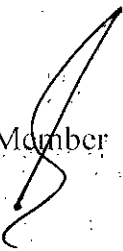
Counsel for the appellant, Asst: AG for official respondent No.1 and counsel for respondents No.2 to 4 present. Learned Counsel for respondents No.2 to 4 requested for adjournment. Parties are directed to assist the Tribunal on the point of maintainability. To come up for arguments on the point of maintainability on 08.05.2017 before D.B.


(AHMAD HASSAN)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

8.05.2017

Clerk of
Counsel for the appellant and Addl. AG for the respondents present. Due to strike of the bar counsel for the appellant is not available. To come up for final hearing for 11.07.2017 before D.B.


Member


Chairman

11.07.2017


Junior to counsel for the appellant and Mr. Ziaullah, DDA for the respondents present. Requested for adjournment as senior counsel for the appellant is busy in Darul Qaza, Swat. Adjourned. To come up for arguments on 06.11.2017 before the D.B.


Member


Chairman

04.04.2016

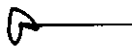
Counsel for the appellant and Mr. Sajjad Durrani, Legal Advisor, alongwith Addl: AG for respondents present. Rejoinder submitted, copy whereof handed over to learned Addl: AG. To come up for arguments on 27.7.16 before D.B.


Member

27.07.2016


Appellant with counsel and Mr. Muhammad Jan, GP for respondents present. Counsel for the appellant seeks adjournment. Adjournment allowed. To come up for arguments on 25.10.2016.


Member


Member

25.10.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 28.02.2017 before D.B.


Member


Chairman

27.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Station Coordinator (BPS-14) when dismissed from service vide impugned order dated 8.4.2015 on the allegations of wilful absence from duty on 12.8.2011 regarding which he preferred departmental appeal on 13.4.2015 which was not responded and hence the instant service appeal on 15.7.2015.

That the impugned order was passed by incompetent authority. That no charge sheet or show cause notice was ever issued nor appellant associated with the inquiry which was not even conducted in the prescribed manners.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 13.10.2015 before S.B.


Chairman

13.10.2015

Appellant in person and Addl: A.G for respondents No. 1 and 2 present. Mr. Sikandar Rashid, Advocate on behalf of respondents No. 3 and 4 present and submitted Wakalat Nama. Requested for adjournment. To come up for written reply/comments on 21.12.2015 before S.B.



Chairman

21.12.2015

Counsel for the appellant and Mr. Sakandar Rashid, Advocate alongwith Addl: A.G for respondents present. Written statement submitted. The appeal is assigned to D.B for rejoinder and final hearing for 4.4.2016.


Chairman

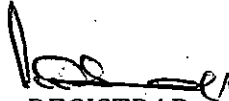

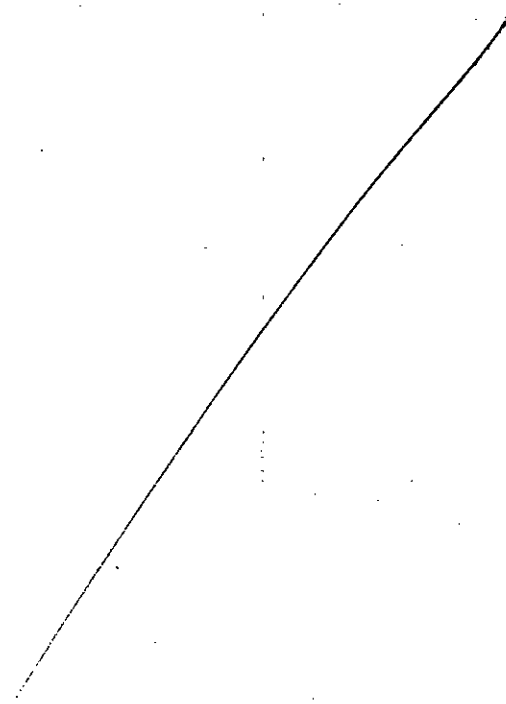
Appellant Deposited
Security & Process Fee



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 819/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	15.07.2015	<p>The appeal of Mr. Bakht Rawan presented today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	16-7-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>27-10-2015</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> 

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

WRIT PETITION NO. 819 /2015

BAKHT RAWAN

VS

GOVT: OF KPK

INDEX

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5.	Show cause notice	D	14- 16.
6.	Reply	E	17.
8.	Impugned order	F	18.
9.	Departmental appeal	G	19- 22.
10.	Vakalat nama	23.

APPELLANT

THROUGH:

NOOR MUHAMMAD KHATTAK
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 819 /2015

K.W.F. Province
Service Tribunal

Diary No. 864

Date 15-7-2015

Mr. Bakht Rawan, Station Co-Ordinator (BPS-14),
O/O the Emergency Rescue Service 1122, Station No.66,
Sherpaw, Khyber Pakhtunkhwa, Peshawar **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Relief and Rehabilitation Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Director General Rescue 1122, Khyber Pakhtunkhwa, Peshawar.
- 4- The Administrative Officer Rescue 1122, Khyber Pakhtunkhwa, Peshawar.

..... **RESPONDENTS**

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 08.04.2015 WHEREBY MAJOR PENALTY OF DISMISSAL FROM SERVICE WAS IMPOSED ON THE APPELLANT WITHOUT ANY REASON AND WITHOUT CONDUCTING REGULAR INQUIRY IN THE MATTER AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS

PRAYER:

That on acceptance of this appeal the impugned order 08.04.2015 may very kindly be set aside and the respondents may please be directed to re-instate the appellant with all back benefits. Any remedy which this august Tribunal deems that may also be awarded in favor of the appellant.

R/SHEWETH:

ON FACTS:

- 1- That appellant was appointed as Station Coordinator BPS-14 in the Rescue 1122 in the year 2010. That after appointment the appellant submitted his charge report and started performing his duty quite efficiently and up to the entire satisfaction of his superiors.

Handwritten notes:
15/7/15

- 2- That due to his hard work and commitment to his job description the appellant was assigned the extra charge of Station House Incharge (BPS-16). That appellant also performed the said duty quite efficiently and with all zeal and zest.

- 3- That appellant while working in the Rescue 1122 Department the respondent No.3 served a statement of allegation without charge sheet on the appellant in which it was alleged that the appellant have absented himself from duty on 23.8.2011 along with the allegation which are as follows. Copy of the statement of allegation is attached as annexure **A.**
 - i. Explanation issued by District Emergency Officer, Peshawar on dated 07.01.2014 due to submitting the blank Duty Rota of Station-66, Peshawar.
 - ii. As per visit report of station-66 Peshawar on dated 01/01/2015 by District Emergency Officer, Peshawar the following observed:
 - iii. Poor administration of Rescue Station which affects the Operational activities of Rescue-1122.
 - iv. Emergency Vehicles and equipments were in very pathetic condition with poor maintenance.
 - v. Attendance register, stock register and other official record were not maintained.
 - vi. Rescuers were found with poor discipline, and were not properly geared up.
 - vii. During the inspection of District Emergency Officer, Peshawar you were found irresponsible, careless and disobedient.
 - viii. Allegations against you for receiving case for recommending leave to the rescuers.
 - ix. Allegations against you for receiving case for adjusting officials favorably in duty Rota.
 - x. Making threatening calls to District Emergency Officer Peshawar and issuing threats and using abusive language towards superior officers.
 - xi. Generally mentioning and debiting, unacceptable discipline and professionalism.

- 4- That in response to the said statement of allegation dated Nil the appellant submitted his detail reply and denied all the allegations which have been leveled against the appellant by the respondent No.3. Copy of the reply is attached as annexure **B.**

- 5- That it is very pertinent to mention, that the appellant is leading the employees of rescue 1122 in the case title Ihsanullah and 688 others VS Govt: of KPK filed by the

employees of Rescue 1122 against the respondent No.3 and others and due to that reason the concerned Director General Rescue 1122 imposed undue influence and pressurized the appellant and his other colleagues to withdraw the case against him. That appellant time and again requested and explained the scenario to the concerned D.G about his case but inspite of that the concerned D.G acted in arbitrary and malafide manner. Copy of the judgment is attached as annexure C.

- 6- That then after the appellant was served with a show cause notice in which the same baseless allegations have been mentioned which was mentioned in the previous statement of allegation. That in response the appellant submitted his reply and denied all the allegations which have been leveled against him. Copy of the show cause notice is attached as annexure D&E
- 7- That due to personal grudges of the concerned Director General Rescue 1122 issued the impugned order dated 8.04.2015 through wrong authority i.e. respondent No.4 against the appellant due to which the appellant was dismissed from service without assigning any reason in the said impugned order. Copy of the impugned order is attached as annexure F
- 8- That appellant feeling aggrieved and having no other remedy prefer Departmental appeal against the impugned order dated 8.4.2015 but no reply has been received so far. Copy of the Departmental is attached as annexure G
- 9- That appellant having no other remedy filed the instant appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned order dated 08.04.2015 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the appellant has been punished on the past and closed transactions, therefore the impugned order dated 8.4.2015 is not tenable in the eyes of law and liable to be set aside on this score alone.

- D- That the impugned order dated 8.4.2015 is the result of writ petitions NO.182-P/2015, 183-P/2015, 300-P/2015 and 301-P/2015 filed by the appellant and his colleagues against the Director General Rescue 1122 and due to that reason the concerned Director General Rescue 1122 got against the appellant and imposed undue influence on the appellant and his other colleagues to withdraw the case against him. That appellant time and again requested and explain the scenario to the concerned D.G about his case but inspite of that the concerned D.G acted in arbitrary and malafide manner by issuing the impugned order dated 8.4.2015 against the appellant.
- E- That no charge sheet has been served against the appellant by the concerned authority before issuing the impugned order dated 8.4.2015.
- F- That no chance of personal hearing/defense has been given to the appellant before issuing the impugned order dated 8.4.2015.
- G- That no final Show cause notice has been served by the concerned authority on the appellant before issuing the impugned order dated 8.4.2015.
- H- That no regular inquiry has been conducted in the matter which as per Supreme Court judgments is necessary in punitive actions against the civil servant.
- I- That the impugned order dated 8.4.2015 has been issued by the wrong authority, therefore the impugned order dated 8.4.2015 is void ab initio in the eyes of law.
- J- That the issue against the appellant is planted one and is clearly based on malafides, therefore the action taken by the concern authority against the appellant in terms of impugned order dated 8.4.2015 is not tenable and liable to be set aside.
- K- That no fact finding inquiry has been conducted in the matter of appellant, therefore the entire proceedings which have been initiated against the appellant is void one.
- L- That no law has been mentioned in the said impugned order dated 8.4.2015, therefore the same is not tenable and liable to be set aside.
- M- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

Dated: 14.7.2015

APPELLANT

A handwritten signature in black ink, consisting of a large, stylized letter 'B' followed by a series of loops and a long horizontal stroke extending to the right.

BAKHT RAWAN

THROUGH:

A handwritten signature in black ink, appearing as a series of vertical and diagonal strokes.

**NOOR MOHAMMAD KHATTAK
ADVOCATE**

A - 6

STATEMENT OF ALLEGATIONS AGAINST MR. BAKHTRAWAN STATION
COORDINATOR KHYBER PAKHTUNKHWA EMERGENCY RESCUE SERVICE
(RESCUE-1122), PESHAWAR.

1. Explanation on dated 23/08/2011 issued for being absent from duty on dated 12/08/2011.
2. Explanation issued by District Emergency Officer, Peshawar on dated 07/01/2014 due to submitting the blank Duty Rota of Station-66, Peshawar.
3. As per visit report of station -66 Peshawar on dated 01/01/2015 by District Emergency Officer, Peshawar the following were observed:
 - Poor administration of Rescue Station which affects the Operational activities of Rescue-1122.
 - Emergency Vehicles and equipments were in very pathetic condition with poor maintenance.
 - Attendance register, stock register and other official record were not maintained.
 - Rescuers were found with poor discipline, and were not properly geared up.
 - During the inspection of District Emergency Officer, Peshawar you were found irresponsible, careless and disobedient.
 - Allegations against you for receiving cash for recommending leave to the rescuers.
 - Allegations against you for receiving cash for adjusting officials favorably in duty Rota.
 - Making threatening calls to District Emergency Officer Peshawar and issuing threats and using abusive language towards superior officers.
 - Generally maintaining and exhibiting unacceptable discipline and professionalism.

Fazal Ullah
DIRECTOR GENERAL
Emergency Rescue Service (Rescue-1122),
Khyber Pakhtunkhwa

ATTESTAD

[Signature]

1

TO

B-7

The Inquiry Officer Emergency Rescue Service 1122, Peshawar

REPLY IN RESPONSE TO THE STATEMENT OF ALLEGATIONS SERVED BY YOUR GOOD SELF ENDORSMENT NO. NIL DATED. NIL

Most humbly my Para wise reply to the statement of allegations are as under:

That I am the most efficient employee of your good self Department and I have never done such like acts and omissions which your good self leveled against me and statement of allegations issued by your good self.

- 1- That since it is on old issue therefore the said Para is denied.
- 2- That I have not submitted a blank Rota on dated 7/1/2014.
- 3- That the District Emergency Officer did not pay an official visit to 66 station on dated 1/1/2015 anyhow, my administration is upto the mark emergency vehicles or in better condition attendance register, stock register and other official record are will maintained. Rescuers are in proper uniform as they ought to be according to the rules and regulation of our Department.
- 4- I in the most punctual, responsible, careful, obedient and will temper rescuer.
- 5- That allegations leveled against me as per receiving cash is incorrect and need fact finding.
- 6- I belongs to a respectable family I always talked to my seniors in a respectable way and I would do so in the future as well.
- 7- I have always maintained a discipline upto the mark as well as know how and professionalism upto the high level.
- 8- That all the registers and documentations of 66 stations are updated up to date moreover, they are open for impartial inquiry

It is therefore, most numbly prayed that on acceptance of this reply to the statement of allegations served by good self I may very kindly be exonerated from the charges in light of above facts.

Dated: 3/2/2015

YOUR SINCERELY

BAKHIT RAWAN 3/2/15
Station Coordinator

ATTESTAD

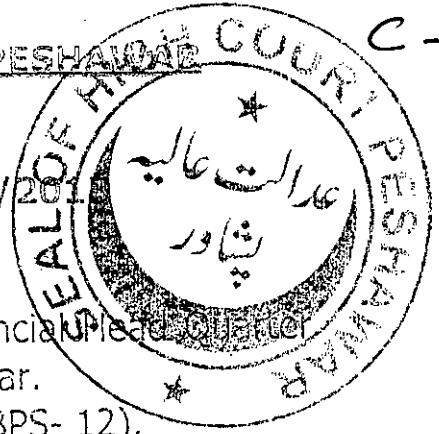
3/2
Allegation reply
submitted to
Inquiry officer

2

BEFORE THE PESHAWAR HIGH COURT PESHAWAR

C-8

WRIT PETITION NO. 182-P/2015



- 1- Mr. Ihsan ullah, Shift Incharge (BPS-12),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar.
- 2- Mr. Sadaqat Shah, Leading Fire Rescuer (BPS- 12),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 3- Abdullah, Leading Fire Rescuer (BPS- 12),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 4- Mr. Muhammad Riaz, Leading Fire Rescuer (BPS- 12),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar.
- 5- Mr. Ghufran Ullah, Leading Fire Rescuer (BPS- 12),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 6- Mr. Aman Ullah, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 7- Mr. Aftab Muhammad, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 8- Mr. Mudasir Shah, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 9- Mr. Asfandyar, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 10- Mr. Tajamul Shah, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 11- Mr. Tahseen Ullah, Fire Rescuer (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 12- Mr. Anwar Ullah, Fire Rescuer (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 13- Mr. Aimal Khalid, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 14- Mr. Munsif, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 15- Mr. Muhammad Ismail, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar.

ATTESTED
EXAMINER
Peshawar High Court
02 APR 2015

ATTESTAD

- 16- Mr. Kabir Ahmad, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 17- Mr. Muhammad Idrees, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 18- Mr. Fazal Manan, Fire Rescuer (BPS- 11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 19- Mr. Noor Ullah, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 20- Mr. Yasin Ullah, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 21- Mr. Jehanzeb, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 22- Mr. Irfan Ullah, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 23- Mr. Tahir Zaman, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 24- Mr. Zahir Ullah, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 25- Mr. Ilyas Khan, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 26- Mr. Amir Zeb, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 27- Mr. Shah Nawaz, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 28- Mr. Mian Noor Muhammad, EMT (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 29- Mr. Salim Marjan, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 30- Mr. Mazhar Ali, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar
- 31- Mr. Zia Ur Rehman, Emergency Medical Technician (BPS-11),
O/O Director General Rescue 1122, Provincial Head Quarter
Tariq Road, Khyber Pakhtunkhwa, Peshawar.
- 32- Mr. Shair Zeb, Emergency Medical Technician (BPS-11),

ATTESTED

EXAMINER
Peshawar High Court

02 APR 2015

ATTESTAD

TODAY

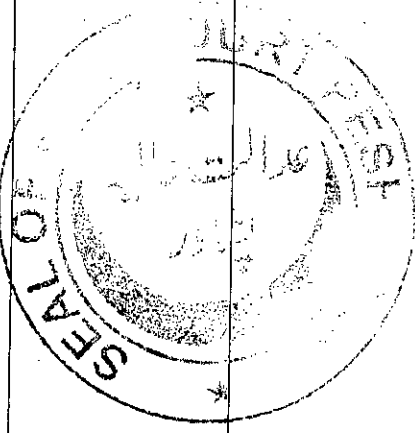
REGISTERED
JAN 2015



PESHAWAR HIGH COURT PESHAWAR.
FORM "A"
FORM OF ORDER SHEET

186
125
10

Court of.....
Case Noof.....

Serial No of order or proceeding	Date of Order or Proceeding	Order or other proceedings with Signature of judge or Magistrate and That of parties or counsel where necessary
1	2	3
	25.03.2015.	<p><u>WP No.182-P/2015 (Motion)</u></p> <p>Present: Mr. Noor Muhammad Khattak, Advocate, for petitioners</p> <p>Mr. Muhammad Suhail, AAG for the official Respondents.</p> <p>Mr. Sabahuddin Khattak, Advocate, for respondents- DG Rescue 1122 on notice.</p> <p>-----</p> <p><u>YAHYA AFRIDI, J.-</u> This single judgment shall dispose of three writ petitions involving identical questions of law and facts. The details of the writ petitions are as under:-</p> <p>(i) <u>Writ Petition No.182-P/15</u> Ihsanullah and 349 others Vs. Chief Secretary KPK & 04 others.</p> <p>(ii) <u>Writ Petition No.300-P/15</u> Shakeel Ahmad & 337 others Vs. Chief Secretary KPK & 04 others.</p> <p>(iii) <u>Writ Petition No.301-P/15</u> Shakeel Ahmad & 337 others Vs. Chief Secretary KPK & 04 others.</p>

ATTESTED
EXAMINER
Peshawar High Court.
02 APR 2015

ATTESTAD

2. The petitioners seek the constitutional jurisdiction of this Court praying that:

"On acceptance of this writ petition the old Service Rules of 2012 of the employees of Rescue 1122 may be declared as illegal, unconstitutional and ineffective upon the rights of the petitioners. That the respondents may very kindly be directed to issue/introduce new service structure/rules for the petitioners being employees of the Rescue 1122 in fair and transparent manner by superseding the old Rules of 2012. Any other remedy which this august Court deems fit that may also be awarded in favour of the petitioners."

3. In essence, the grievance of the learned counsel for the petitioners is that the old Service Rules of 2012 have not been framed in accordance with law and that fresh Service Rules are required to be framed for the welfare of the employees in Rescue 1122. In this connection, he places reliance on the judgment of the august Supreme Court of India reported as State of M.P. Versus Rakesh Kohli and another (2013 SCMR 34) in support of his submissions.

ATTESTED
EXAMINER
Peshawar High Court
02 APR 2015.

9

ATTESTAD

✓ (12) (15) (18)

4. The respondents-department were put on notice, in consequence of which the learned counsel for the respondents appeared and argued that till date the employees of Rescue 1122 do not have any statutory rules. He further argued that fresh draft service rules relating to the employees of Rescue 1122 have been framed by the organization and forwarded to Rescue Council for its approval, which is still awaited.

5. As the process for framing of new service rules has been initiated and the finalization thereof requires time, we direct the respondents to get the same finalized within a period sixty days.

6. As far as the grievance of the petitioners regarding their harassment is concerned, as previously noted vide order 18-03-2015, the relevant para thereof reads as under:-

"The attention of the Court was drawn to the fact that respondents are asserting undue influence over some of the petitioners to detract them from their stance taken in the present petition. The worthy AAG present in

ATTESTED

EXAMINER
Peshawar High Court

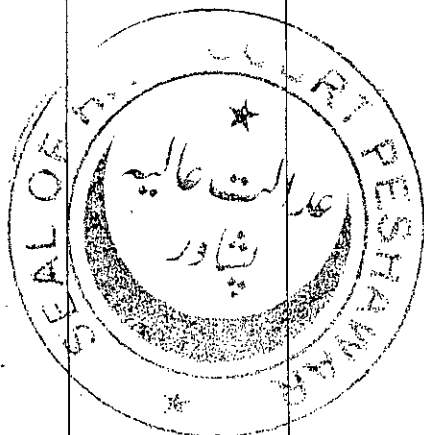
02 APR 2015

ATTESTAD

Court is directed to put the respondents on notice that in case of pressure or influence by the respondents, in any manner, whatsoever, they shall expose themselves to penal action by the Court.

7. In this regard, the petitioners would be at liberty to file separate Contempt of Court Petition before this Court, if so advised.

8. The writ petitions are disposed of with the above observations.



Sd/- Jahya Afzidi JUDGE

Sd/- Muhammad Davd Khan JUDGE

Announced on
26th Mar. 2015

CERTIFIED TO BE TRUE COPY

Peshawar High Court, Peshawar
Authorised Under Article 17 of
The Courts (Sharia) Ordinance 1974

02 APR 2015

17895

Date of Presentation of Application 30-3-15

No of Pages 6P

Copying fee

Urgent Fee

Total

Date of Preparation of Copy 2-4-15

Date Given for Delivery 2-4-15

Date of Delivery of Copy 2-4-15

Received By

Mrs Zaman

ATTESTAD



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
GOVERNMENT OF KHYBER PAKHTUNKHWA
info@rescue1122kpk.com www.rescue1122kpk.com



DIRECTOR GENERAL

No.1-2/Discipline/DG-1122/Estt: 792-97 Peshawar: 19 -02-2015

To

Mr. Bakhtwan
Station Coordinator,
ERS (Rescue-1122) Peshawar.

Subject: SHOW CAUSE NOTICE.

I am directed to send the enclosed show cause notice to be responded within (07) days of issuance of this letter.

This show cause notice issued as per E & D Rules for your final written explanation for personal hearing before competent authority.

Admin Officer
Emergency Rescue Service (Rescue-1122)
Khyber Pakhtunkhwa

Copy to:-

1. District Emergency Officer, ERS (Rescue-1122), Peshawar.
2. PA to Director General, ERS (Rescue-1122), Khyber Pakhtunkhwa.
3. Personal file of the concerned.
4. Office File.

Admin Officer
Emergency Rescue Service (Rescue-1122)
Khyber Pakhtunkhwa

ATTESTAD

M
P



15

DIRECTOR GENERAL

No.1-2/Discipline/DG-1122/Estt: 797-99 Peshawar: 19 - 02-2015

SHOW CAUSE NOTICE:

I Dr. Asad Ali Khan Director General, Khyber Pakhtunkhwa Emergency Rescue Service (Rescue-1122) as competent authority under the E & D Rules do hereby serve you Mr. Bakhtrwan (Station Coordinator) Khyber Pakhtunkhwa Emergency Rescue Service (Rescue-1122) Peshawar as follows;

1. Explanation on dated 23-08-2011 was issued due to being absent from duty on dated 12-08-2011.
2. Explanation issued by Director Operations on dated 07-01-2014 due to submitting the blank roster of 12 hours shift.
3. Suspension order on dated 12-01-2014 was issued with nomination of Inquiry Officer.
4. Explanation issued on dated 20-01-2015 being absent during the visit of the Director Operation on dated 20-01-2015.
5. First Information Report (FIR) through letter No.4/DEO-Pesh/Gen/00-03 dated 28-01-2015 registered against you for abusing and threatening the Director Operations on mobile phone.
6. During the visit of Director Operations on dated 01-01-2015 following were noticed with great concern:
 - i. Very poor standard of cleanliness observed at the station.
 - ii. Register, logbook and especially vehicle maintenance was not satisfactory.
 - iii. A very disappointing aspect was the poor condition of the personal hygiene of the Rescuer.
 - iv. Appearance of uniform of Rescuers was pitiful which clearly shows poor management and ill-discipline on part of the Station Coordinator.
 - v. Furthermore Mr. Bakhtrawan Station Coordinator is disobedient and irresponsible official it is proposed that strict disciplinary action may be initiated against him.
7. Inquiry Officer nominated on dated 12-01-2014 fixed the responsibility and recommended strict action (Major Penalty) according to efficiency and disciplinary Rules, 2011.

ATTESTAD

(Next Page Continue)



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
GOVERNMENT OF KHYBER PAKHTUNKHWA
info@rescue1122kpk.com www.rescue1122kpk.com



DIRECTOR GENERAL

16

No.1-2/Discipline/DG-1122/Estt: 797-99 Peshawar: 10 -02 -2015

8. You are therefore required to show cause as to why the penalty should not be imposed upon you and also intimate if you desire to be heard in person.
9. If no reply to this notice is received within Seven (07) days of its delivery in normal course of circumstance then it shall be presumed that you have no defence to put up before and in that case exparte action shall be taken against you.

DIRECTOR GENERAL

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa,

ATTESTAD

To

E - (17)

The Director General Rescue 1122,
Khyber Pakhtunkhwa Peshawar.

**REPLY IN RESPONSE TO THE SHOW CAUSE NOTICE
DATED 19.2.2015 COMMUNICATED TO THE APPELLANT
ON 21.2.2015**

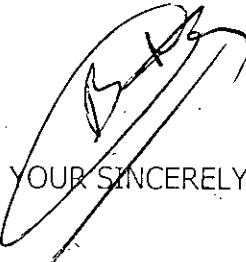
Most humbly my Para wise reply to the show cause notice are as under:-

- 1- That since it is an old issue therefore, the said Para is denied. Further more on dated 23.08.2011 due to illness i.e. Malaria which was further converted to Typhoid I submitted application for leave which was accepted by the competent authority by allowing me leave but inspite of that I was marked absent quite illegally.
- 2- Incorrect I have not submitted blank Rota on dated 7/1/2014 therefore the instant para is denied.
- 3- Incorrect I have never ever been suspended on dated 12.1.2014.
- 4- On dated 20.1.2015 being suspended I had written a short leave application and had left far to participate in the funeral prayer of the cousin of Dr. Shoaib Emergency Rescue Service 1122. The copy of that short leave is attached. Moreover DEO didn't mark me absent in the attendance register. Copy is annexed.
- 5- That the FIR registered against me was the result of misunderstanding between me in Director Operational neither I have threatened him nor I would do so in the future as well. Moreover we have reached to mutual consensus on dated 23.2.2015. Written copy of compromise deed is attached.
- 6- On dated 1.1.2015 the Director Operations did not visit our station. Further more he visited our station on dated 20.1.2015 and according to his remarks every thing is okay. Copy of visiting register is annexed. Any how my administration was up to the mark emergency vehicles were in better condition attendance register, stock register and other official record were well maintained. Rescuers were in proper uniform.

It is therefore, most humbly prayed that on acceptance of this reply to the show cause notice I may very kindly be exonerated from the charges which has been leveled against me.

Dated:

ATTESTAD



YOUR SINCERELY,
BAKHT RAWAN
(STATION COORDINATOR)



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),

GOVERNMENT OF KHYBER PAKHTUNKHWA

info@rescue1122kpk.com www.rescue1122kpk.com



No.1-1/Office Order/DG-1122/Estt: 1537-44 Peshawar: 8-4-2015

F-(18)

OFFICE ORDER

Consequent upon the approval of the competent authority, the recommendations of the inquiry officer and after holding personal hearing to the official and fulfilling all codal formalities under the (Efficiency & Discipline) Rules 2011, the competent authority has further agreed to the findings of inquiry officer and decided to impose the major penalty by dismissing Mr. Bakht Rawan S/O Khan Pachai Station Coordinator (BPS-14) Khyber Pakhtunkhwa Emergency Rescue Service (Rescue-1122) Peshawar holding of CNIC Number 21106-1911823-7 resident of village Kharkano P.O Khar Tehsil Salarzai District Bajaur Agency Khyber Pakhtunkhwa with immediate effect.

(ADMIN OFFICER)

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa

Copy to:-

1. Accountant General, Khyber Pakhtunkhwa.
2. District Emergency Officer, Emergency Rescue Service (Rescue-1122), Peshawar.
3. PS to Secretary Relief Rehabilitation & Settlement Department, Govt. of Khyber Pakhtunkhwa.
4. Accountant, Emergency Rescue Service (Rescue-1122), Peshawar.
5. PA to Director General, ERS (Rescue-1122) Khyber Pakhtunkhwa.
6. Senior Store Keeper, ERS (Rescue-1122) Head Quarter.
7. Mr. Bakht Rawan Ex- Station Coordinator ERS (Rescue-1122) Station-66 Peshawar.
8. Office file.

(ADMIN OFFICER)

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa

ATTESTAD

[Handwritten signature]

To

G-19

The Hon'ble Secretary Relief & Rehabilitation Deptt.,
Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 08.04.2015 WHEREBY MAJOR PENALTY OF DISMISSAL FROM SERVICE WAS IMPOSED ON THE APPELLANT WITHOUT ANY REASON AND WITHOUT CONDUCTING REGULAR INQUIRY AGAINST THE APPELLANT

R/SHEWETH:
ON FACTS:

- 1- That appellant was appointed as Station Coordinator BPS-14 in the Rescue 1122 in the year 2010. That after appointment the appellant submitted his charge report and started performing his duty quite efficiently and up to the entire satisfaction of his superiors.
- 2- That due to his hard work and commitment to his job description the appellant was assigned the extra charge of Station House Incharge (BPS-16). That appellant also performed the said duty quite efficiently and with all zeal and zest.
- 3- That appellant while working in the Rescue 1122 Department the Director General Rescue 1122 served a statement of allegation without charge sheet on the appellant in which it was alleged that the appellant have absented himself from duty on 23.8.2011 along with the allegation which are as follows.
 - i. Explanation issued by District Emergency Officer, Peshawar on dated 07.01.2014 due to submitting the blank Duty Rota of Station-66, Peshawar.
 - ii. As per visit report of station-66 Peshawar on dated 01/01/2015 by District Emergency Officer, Peshawar the following observed:
 - iii. Poor administration of Rescue Station which affects the Operational activities of Rescue-1122.
 - iv. Emergency Vehicles and equipments were in very pathetic condition with poor maintenance.
 - v. Attendance register, stock register and other official record were not maintained.
 - vi. Rescuers were found with poor discipline, and were not properly geared up.

ATTESTAD



- vii. During the inspection of District Emergency Officer, Peshawar you were found irresponsible, careless and disobedient.
- viii. Allegations against you for receiving case for recommending leave to the rescuers.
- ix. Allegations against you for receiving case for adjusting officials' favorably in duty Rota.
- x. Making threatening calls to District Emergency Officer Peshawar and issuing threats and using abusive language towards superior officers.
- xi. Generally mentioning and debiting, unacceptable discipline and professionalism.

4- That in response to the said statement of allegation dated Nil the appellant submitted his detail reply and denied all the allegations which have been leveled against the appellant by the Director General Rescue 1122.

5- That it is very pertinent to mention that the appellant is leading the employees of rescue 1122 in the case title Ihsanullah and 688 others VS Govt: of KPK filed by the employees of Rescue 1122 against the Director General Rescue 1122 and others and due to that reason the concerned Director General Rescue 1122 imposed undue influence and pressurized the appellant and his other colleagues to withdraw the case against him. That appellant time and again requested and explained the scenario to the concerned D.G about his case but inspite of that the concerned D.G acted in arbitrary and malafide manner.

6- That then after the appellant was served with a show cause notice in which the same baseless allegations have been mentioned which was mentioned in the previous statement of allegation. That in response the appellant submitted his reply and denied all the allegations which have been leveled against him.

7- That due to personal grudges of the concerned Director General Rescue 1122 issued the impugned order dated 8.04.2015 through wrong authority against the appellant due to which the appellant was dismissed from service from service without assigning any reason in the said impugned order.

8- That appellant feeling aggrieved and having no other remedy prefers the instant Departmental appeal inter alia on the following grounds.

ATTESTAD



GROUND:

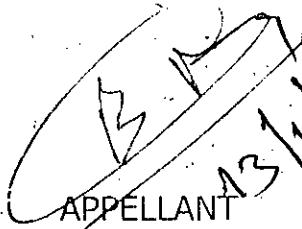
- A- That the impugned order dated 08.04.2015 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated in accordance with law and rules by the authority on the subject noted above and as such the authority violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the appellant has been punished on the past and closed transactions, therefore the impugned order dated 8.4.2015 is not tenable in the eyes of law and liable to be set aside on this score alone.
- D- That the impugned order dated 8.4.2015 is the result of writ petitions NO.182-P/2015, 183-P/2015, 300-P/2015 and 301-P/2015 filed by the appellant and his colleagues against the Director General Rescue 1122 and due to that reason the concerned Director General Rescue 1122 got against the appellant and imposed undue influence on the appellant and his other colleagues to withdraw the case against him. That appellant time and again requested and explain the scenario to the concerned D.G about his case but ~~inspite of~~ that the concerned D.G acted in arbitrary and malafide manner by issuing the impugned order dated 8.4.2015 against the appellant.
- E- That no charge sheet has been served against the appellant by the concerned authority before issuing the impugned order dated 8.4.2015.
- F- That no chance of personal hearing/defense has been given to the appellant before issuing the impugned order dated 8.4.2015.
- G- That no final Show cause notice has been served by the concerned authority on the appellant before issuing the impugned order dated 8.4.2015.
- H- That no regular inquiry has been conducted in the matter which as per Supreme Court judgments is necessary in punitive actions against the civil servant.
- I- That the impugned order dated 8.4.2015 has been issued by the wrong authority, therefore the impugned order dated 8.4.2015 is void ab initio in the eyes of law.

ATTESTAD

- J- That the issue against the appellant is planted ~~one~~ and is clearly based on malafides, therefore the action taken by the concern authority against the appellant in terms of impugned order dated 8.4.2015 is not tenable and liable to be set aside.
- K- That no fact finding inquiry has been conducted in the matter of appellant, therefore the entire proceedings which have been initiated against the appellant is void one.

It is therefore most humbly prayed that on acceptance of this Departmental appeal the impugned order dated 8.4.2015 may very kindly be set aside and the appellant may be re-instated with all back benefits. Any other remedy which your good self deems fit that may also be awarded in favor of the appellant.

Dated: 13.4.2015


APPELLANT
13/4/15

BAKHT RAWAN, STATION CO-ORDINATOR (BPS-14),
O/O EMERGENCY RESCUE SERVICE 1122 STATION
NO.66, SHERPAW, KHYBER PAKHTUNKHWA, PESHAWAR.

ATTESTAD



BEFORE THE KHYBER PAKHTUNKWA SERVICE TRIBUNAL,

PESHAWAR

APPEAL No. 819 / 2015..

Bakht Rawan.....Appellant.

Versus

The Government of Khyber Pakhtunkhwa through

Chief Secretary & others.....Respondents.

WAKALATNAMA /POWER OF ATTORNEY

KNOW all to whom these shall come that I/We the undersigned appoint **Sikanar Rasheed** Advocate Supreme court of Pakistan to be an advocate for **RESPONENT NO 3& 4** in the above mentioned case to do all following acts, deeds and things or any of these that is to say.

- 1.To act, appear and plead in the above mentioned case in this court or any other court in which the same may be tried or heard in the first instance or in appeal or in revision or execution or in any other stage of its progress until its final decision.
- 2.To present pleadings,appeals,cross objections for execution review, revision, withdrawal, compromise or other petitions or affidavits or other documents as shall be deemed necessary or advisable for the prosecution/ defense of the said cause at all its stages.
3. To withdraw or compromise the said case or submit to arbitration any differences or disputes that shall arise touching or in any manner to the said case.
4. To receive and grant receipts therefore a to do all other acts & things which may be necessary to be done for the progress in the course of prosecution/defense of cause.
5. To employ, authorize any other legal practitioner to assist or exercise the power and authority hereby conferred on the advocate whenever he may think to do so.

AND I/ WE agree to ratify whatever the advocate or his substitute shall do in this behalf **AND I/WE** hereby agree not to hold the advocate or his substitute responsible for the result of the said case consequences of his absence from the court when the said case is called up for hearing. **AND I/ WE** hereby agree that in the event of the whole or any part of the fee agreed by me /us to be paid to the advocate remaining unpaid, he shall be entitled to withdraw from the prosecution / defense of the said case until the same is paid.

WHEREFOR I/ WE here under set my / our hands to these presents the contents of which have been explained to and understood by me/us.

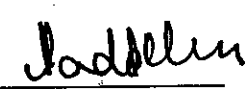
Dated.

Accepted subject to the above terms
& payment of settled fee.

Sikander Rasheed
Advocate Supreme Court of Pakistan

SIKNADAR RASHID
Advocate
Supreme Court Of Pakistan

Signature/ Thumb Impression of Client.
Respondent No 3

Mr. Asad ali Khan 
DG Rescue 1122, Peshawar
Respondent No 4

Mr. Aruj Sherazi 
Admin. Officer Rescue 1122, Peshawar

BEFORE THE KHYBER PAKHTUNKWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL No. 819 / 2015.

Bakht Rawan.....Appellant.

Vs

The Government of Khyber Pakhtunkhwa through
Chief Secretary & others.....Respondents.

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DEPONENT

CNIC: 12101-3238560-9

BEFORE THE KHYBER PAKHTUNKWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL No. 819 / 2015.

Bakht Rawan.....Appellant.

Vs

**The Government of Khyber Pakhtunkhwa through
Chief Secretary & others.....Respondents.**

AFFIDAVIT

**I ARUJ SHERAZI Litigation Officer Emergency Rescue Services (Rescue 1122)
Department Khyber Pakhtunkhwa, do hereby solemnly affirm that the contents of
accompanying parawise reply on behalf of Respondents of this appeal are true and
correct to the best of my knowledge and belief and nothing has been concealed from this
honorable court.**

DEPONENT

CNIC: 12101-3238560-9

Identified by

REGISTRAR SERVICE TRIBUNAL

**Government of Khyber Pakhtunkhwa,
Peshawar**



10

BEFORE THE KHYBER PAKHTUNKWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL No. 819 / 2015.

Bakht Rawan.....Appellant.

Vs

The Government of Khyber Pakhtunkhwa through
Chief Secretary & others.....Respondents.

REPLY TO THE APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT
1974 FOR AND ON BEHALF OF RESPONDENTS 2 TO
4.

RESPECTFULLY SHEWEETH:

Preliminary Objections:

- I. That the appellant has got no locus standi to file the instant appeal.
- II. That the appellant have concealed material facts from this honorable tribunal. Thus, he has not come with clean hands.
- III. That the appellant is estopped by his own words and conduct to institute the present appeal, because he is not a civil servant.
- IV. That the appeal is not maintainable in its present form, due to lack of jurisdiction before this honorable service tribunal.
- V. That the appellant is not the aggrieved persons within the meaning of Article-199 of the Constitution of Islamic Republic of Pakistan, 1973. Hence, the appeal is liable to be dismissed on the score alone.
- VI. That relationship of master & servant exists between the appellant and respondent No 3 and 4, the appellant have no Legal justification to file the instant appeal.



ON FACTS:

1. In reply to Para No.1, it is humbly submitted that the Appellant was appointed as Station Coordinator B.P.S-14 in the Rescue 1122 in the year 2010.

2. In reply to the instant Para, it is respectfully submitted that the Appellant was assigned additional charge of Station House In charge for a period of few months.

3. That before replying to the instant Para, the answering respondents would like to apprise this Honorable Tribunal about the conduct and past history of the appellant. The appellant is a habitual absentee from work and on one pretext or the other is always asking for leave which shows his interest in performing his duties. Before issuing the statement of allegations dated.07.01.2014 to the appellant, he was issued numerous explanations from time to time for his lack of interest in his duties. An F.I.R No.52 dated.03.02.2015 was also registered against the Appellant by Director Operations for threatening him on phone of dire consequences. Appellant was granted bail in that case due to a compromise between the parties. Now as far as statement of allegations dated.07.01.2014 is concerned, the said statement of allegations was issued to the appellant for the reasons given in detail in the said statement of allegations. Complete record of explanations, replies, leave applications, F.I.R & compromise are marked as Annexure "A" to "A-

4. In reply to the instant Para, it is humbly submitted that the appellant filed his reply to the statement of allegations wherein he denied all the allegations.

5. Denied as Laid: In reply to the instant Para, it is very respectfully submitted that the Appellant is miss-guiding this Learned Tribunal. Writ Petition No.182-P, 300-P & 301-P / 2015 were filed by the employees of the Rescue 1122 for framing of fresh service rules. In addition to that they also submitted before the Honorable High Court Peshawar that the answering respondents are harassing the employees of the Rescue 1122 who have filed the instant Writ Petitions. The Honorable High Court disposed of all the above mentioned Writ Petitions with a direction to the answering respondents to frame the service rules within 60 days. As far as

Harassment of the employees of Rescue 1122 is concerned, the Honorable High Court directed the Petitioners (Those who filed Writ Petitions) to file separate Contempt of Court application if so advised. After the disposal of all the above mentioned Writ Petitions, the Petitioners in those Writ Petition filed a contempt of Court application before the Honorable Peshawar High Court wherein they alleged that the services of some of the employees has been terminated and the answering respondents have started departmental proceedings against the employees of Rescue 1122 who filed those Writ Petitions. The Honorable High Court sought record from us to show that why departmental proceedings are initiated against the employees of Rescue 1122. Complete record was placed before the Honorable Peshawar High Court and after perusing the whole record, the Contempt Application was dismissed and the Contempt notices issued to the Respondents were withdrawn.

(True copy of the Contempt application and Order dated 16-6-2015, are marked as Annexure "B" & "C" respectively)

6. In reply to the instant Para, it is humbly submitted that Show Cause notice was issued to the Appellant in accordance with Law. Reply to the Show cause notice was given by the Appellant wherein he denied all the allegations.

7. In reply to the instant Para, it is respectfully submitted that the appellant is leveling baseless allegations against the answering respondents. Proper inquiry was conducted against the appellant and the inquiry officer in his report recommended major penalty of dismissal from service (Annexed "D"). After that, final show cause notice Dated: 19/02/2015 (Annexed "E"), was given to the appellant which was duly replied by him denying all the allegations. The appellant was summoned for personal hearing on 20.03.2015 (Annexed "F") and after affording an opportunity of personal hearing, the appellant was dismissed from service vide Office Order dated.08.04.2015 by the competent authority in accordance with Law (Annexed "G").

It is pertinent to mention here that after receiving the final show cause notice, the appellant started spreading false propaganda against the department of Rescue 1122 and its officials by convening an illegal meeting of the Station Coordinator, Shift In charge & Lead Fire Rescuers of District Peshawar & Mardan on 14th of March 2015 at 02:00 PM which was against E & D Rules and Khyber Pakhtunkhwa Emergency Rescue Act 2012 and also against The West Pakistan Essential Service (Maintenance) Act 1958. Another explanation dated.18.03.2015 was called from the Appellant to explain his position within three days as to why he called that illegal meeting and provoking the staff against the department and its officials. Reply to

(4)

the explanation was given by the Appellant where not only he admitted the convening of that illegal meeting rather also threatened the department to withdraw the explanation as it amounts to Contempt of Court. The appellant further stated in his reply to the explanation that if the explanation is not withdrawn, he will file Contempt of Court application before the Honorable High Court Peshawar. From the above stated facts, this Learned Tribunal can very well judge the conduct of the Appellant.

8. In reply to the instant Para, it is humbly submitted that the Appellant's departmental appeal is pending before the department and without waiting for the outcome of the departmental appeal, the Appellant filed the instant appeal before this Learned Tribunal.

GROUND:

A. In reply to Para A, it is humbly submitted that complete procedure as per law was adopted while proceeding departmentally against the Appellant. Statement of allegations was issued to the Appellant to which he replied and after considering the reply not satisfactory; Inquiry Officer was appointed who after conducting through inquiry recommended major penalty of dismissal from service. Final show cause notice was issued to the Appellant and on receiving his reply to show cause notice, an opportunity of personal hearing was given to the Appellant. The whole proceedings were conducted in accordance with Law.

B. In reply to Para B, it is respectfully submitted that no Article of the constitution was violated while proceeding against the Appellant. The Appellant was given full opportunity to defend and explain his position but instead of defending himself, the Appellant during the inquiry proceedings called an illegal meeting of the employees of Recue 1122 at Mardan and provoked the staff against the department and its officials. When explanation was called from him with regard to the convening of that illegal meeting, reply to the explanation was given by the Appellant where not only he admitted the convening of that illegal meeting rather also threatened the department to withdraw the explanation as it amounts to Contempt of Court. The appellant further stated in his reply to the explanation that if the explanation is not withdrawn, he will file Contempt of Court application before the Honorable High Court Peshawar. Accordingly a Contempt application was filed before the Honorable High Court

Peshawar and the Honorable High Court after perusing the whole record, dismissed the Contempt application.

C. In reply to instant Para, it is respectfully submitted that the Appellant was given numerous opportunities to mend his ways and to perform his duty according to the set rules and regulations as Rescue 1122 is suppose to provide rescue services to the people of this province already effected by the terror incidents but instead of performing his duties with zeal and zest, the Appellant was performing his duty very carelessly and not only this but also provoking the other employees against the department and it officials without any reason but to put pressure on the department to withdraw the proceedings against him.

D. In reply to the instant Para, it is humbly submitted that the Appellant is just leveling baseless allegations against the answering respondent. The same baseless allegations were put before the Honorable High Court Peshawar in the shape of a Contempt application but the Honorable High Court after perusing and examining the whole record, dismissed the Contempt Application against the answering respondents which is a proof by itself that the Appellant is leveling baseless allegations against the answering respondent.

E. In reply to the instant Para, it is respectfully submitted that Statement of Allegations was issued to the Appellant and after the whole procedure of inquiry was conducted in accordance with Khyber Pakhtunkhwa (Efficiency & Discipline) Rules 2011 which culminated in the Office Order dated.08.04.2015.

F. Denied as Laid: In reply to the instant Para, it is humbly submitted that the Appellant is misstating before this Learned Tribunal. The Appellant was called for personal hearing vide letter No.2-8/Summon/DG-1122/Estt:1418-22, dated.20.03.2014 and was directed to appear before the Competent Authority (DG Rescue 1122) on 24.03.2015. The appellant appeared before the DG Rescue 1122 on 24.03.2015 and acknowledged the above mentioned letter of personal hearing.

G. Denied as Laid: In reply to the instant Para, it is once again respectfully submitted that the Appellant is misstating before this Learned Tribunal. The appellant was given show cause notice on 19.02.2015 which was duly replied by the Appellant on 26.02.2015.

H. Denied as Laid: In reply to instant Para, it is humbly submitted that proper inquiry was conducted in accordance with Khyber Pakhtunkhwa (Efficiency & Discipline) Rules 2011.

I. In reply to the instant Para, it is humbly submitted that the Impugned Order has been issued by the DG Rescue 1122 who is the proper person and competent authority.

J. In reply to the instant Para, it is submitted with respect that nothing has been planted against the Appellant rather thorough investigation was conducted in the shape of inquiry and after finding the Appellant guilty, the impugned order dated.08.04.2015 was issued.

K. Detailed reply to the instant Para has already been given in the preceding Paras.

L. In reply to the instant Para, it is humbly submitted that the Appellant was departmentally proceeded under Khyber Pakhtunkhwa (Efficiency & Discipline) Rules 2011 and was dismissed from service under the Khyber Pakhtunkhwa (Efficiency & Discipline) Rules 2011 which is explicitly written in the Impugned Order and that is the reason that the Appellant has filed appeal before this Learned Tribunal.



It is therefore respectfully prayed that the instant appeal in the light of above mentioned submissions may kindly be dismissed as it is without any substance and material.

RESPONDENT NO. 1



For

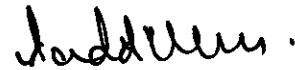
CHIEF SECRETARY
Government of Khyber Pakhtunkhwa

RESPONDENT NO. 2



SECRETARY
Relief Rehabilitation and Settlement
Government of Khyber Pakhtunkhwa.

RESPONDENT NO.3




DIRECTOR GENERAL
Emergency Rescue Service (Rescue-1122)
Khyber Pakhtunkhwa.

RESPONDENT NO. 4



ADMIN OFFICER
Emergency Rescue Service (Rescue-1122)
Khyber Pakhtunkhwa.

Through



Sikandar Rasheed
Advocate Supreme Court of Pakistan



6

DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA
091-2264223-4-5 2263158 Fax: 091-2263159
ersrescue1122kpk@yahoo.com



No.1/ERS-Rescue 1122/Discipline/2010-11/ 1024-28

Peshawar: 23 - 8 - 2011

To

Mr. Bakhtrawan,
Station Coordinator, (SC)
Station- 33

Subject: **EXPLANATION**

It has been reported that you remained absent from your duty on dated:
12-08-2011 without any intimation/permission of your seniors.

2. You must know that being a project employee, your services can be terminated any time without assigning any reason under the rules, however, before taking any punitive action against you; you are given hereby an opportunity to explain your position about your willful absentee within three days of the receipt of this letter as to why disciplinary action should not be taken against you, including dismissal from service.

(Director General)
Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa, Peshawar.

Copy to:-

- 1- Director, Emergency Rescue Service (Rescue 1122), Peshawar.
- 2- District Emergency Officer, Emergency Rescue Service (Rescue 1122), Peshawar.
- 3- Personal file.

(Director General)
Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa, Peshawar.

ca



OFFICE OF THE DISTRICT EMERGENCY OFFICER
Khyber Pakhtunkhwa Emergency Rescue Service
(Rescue - 1122), Peshawar

(9)



No.2/Discipline/DEO -Pesh/

Peshawar: 7 - 1 - 2015

To

Mr. Bakhtrawan - Station Coordinator-66
ERS (Rescue-1122) Peshawar.

Subject: EXPLANATION

Reference to the order issued by this office regarding submission of 12 hours duty Roaster, it has been noticed with great concern that you intentionally submitted blank roaster showing just names only and no other requisite information was available.

2. The above mentioned fact proves you to be totally irresponsible, carefree and negligent official. Your attitude is totally against the office decorum/discipline and is tantamount to gross misconduct.

3. However, before taking any punitive action against you, you are given hereby an opportunity to explain your position about your above mentioned act within three days of the receipt of this letter as to why disciplinary action should not be taken against you.

(DISTRICT EMERGENCY OFFICER)
Emergency Rescue Service (Rescue 1122),
Peshawar.

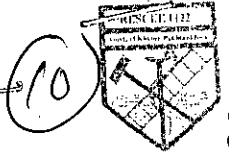
Copy to:-

1. Director (Admin), ERS (Rescue 1122), Peshawar, Khyber Pakhtunkhwa.
2. PA to Director General, ERS (Rescue 1122), Peshawar, Khyber Pakhtunkhwa.
3. Personal files of the concerned.
4. Office File

(DISTRICT EMERGENCY OFFICER)
Emergency Rescue Service (Rescue 1122),
Peshawar.



OFFICE OF THE DISTRICT EMERGENCY OFFICER
Khyber Pakhtunkhwa Emergency Rescue Service
(Rescue - 1122), Peshawar



No.2/Discipline/DEO -Pesh/58-63

Peshawar: 20-1-2015

To

1. Mr. Bakhtawan - Station Coordinator - 66
2. Mr. Fazal Rabi- Office Attendant Head Quarter

Subject: EXPLANATION

It has been noticed with great concern that during surprise visit of the undersigned dated 20-01-2015, you were not present in their respective duty place.

2. The above mentioned fact proves you to be totally irresponsible, carefree and negligent official. Your attitude is totally against the office decorum/discipline and is tantamount to gross misconduct.

3. However, before taking any punitive action against you; you are given hereby an opportunity to explain your position about your above mentioned act within seven days of the receipt of this letter as to why disciplinary action should not be taken against you.

(DISTRICT EMERGENCY OFFICER)
Emergency Rescue Service (Rescue 1122),
Peshawar.

Copy to:-

1. Director (Admin), ERS (Rescue 1122), Peshawar, Khyber Pakhtunkhwa.
2. PA to Director General, ERS (Rescue 1122), Peshawar, Khyber Pakhtunkhwa.
3. Personal files of the concerned.
4. Office File

(DISTRICT EMERGENCY OFFICER)
Emergency Rescue Service (Rescue 1122),
Peshawar.



DIRECTORATE GENERAL OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
GOVERNMENT OF KHYBER PAKHTUNKHWA

091-9222488 Fax: 091-9222487

No. 1-20/General/DA-1122/Estt. 1321-3 Peshawar: 18/3/2015



11 104

To

Mr. Bakht Rawan,
(Station Coordinator)
District Peshawar.

Dispatch MD-110

Subject: EXPLANATION

The competent authority noticed with great concern that the state of the art service of Rescue, 1122 is deteriorating with every passing day due to your conspiracies against the department which is the only department providing emergency rescue service to the masses entrapped in natural and manmade calamities.

You with malafide intention called a meeting of Station Coordinator, Shift Incharge, Lead Fire Rescuers of District Peshawar and Mardan on 14th March, 2015 at 02:00 PM to invoke the bad sentiments against the officers and department. The meeting you called is against E&D rules and Khyber Pakhtunkhwa Emergency Rescue Service Act 2012 and also against the West Pakistan essential service (maintenance) Act 1958.

Furthermore an affidavit/ undertaking which you signed at the time of appointment also clearly states that you will not indulge in any undesirable activities like ganging up or acts involving moral turpitude.

You have also been found engaging in the spread of false propaganda against the department, institution and the high authorities. You have also been found by forging of false signature of Rescuers in submission of false and baseless allegations to different quarters.

You are directed to explain your position regarding the convening of the meeting and provoking the staff against the department and officers, within the 03 days of issuance this explanation.

In case you failed to make satisfactory reply the strict disciplinary action will be initiated against you under the above mentioned rules.

[Signature]
(DISTRICT EMERGENCY OFFICER)
Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa, Peshawar.

Copy to:

1. District Emergency officer, ERS (Rescue 1122), Peshawar, Khyber Pakhtunkhwa.
2. PS to Secretary Relief Rehabilitation & Settlement Department, Govt of Khyber Pakhtunkhwa.
3. PA to Director General, ERS (Rescue-1122), Khyber Pakhtunkhwa, Peshawar.
4. Personal file of the concerned.

Dispatch MD-110

(DISTRICT EMERGENCY OFFICER)
Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa, Peshawar.

[Signature]

White S... (1)

Date	Officer	Rank	Time	Remarks	Signature
5/8/14	Dr. Shoaib	EO	9:00	OK	[Signature]
6/8/14	Dr. Shoaib	EO	10:00	OK	[Signature]
6/8/14	Kamal Shah	EO	9:00	OK	[Signature]
7/8/14	Dr. Shoaib	EO	10:00	OK	[Signature]
7/8/14	Kamal Shah	EO	12:00	OK	[Signature]
8/8/14	Dr. Shoaib	EO	3:00 pm	Satisfactory	[Signature]
8/8/14	Kamal Shah	EO	3:00 pm	Good	[Signature]
3/8/14	R. Adil Shah	SHT	3:45 pm	OK	[Signature]
9/8/14	Dr. Shoaib	EO		OK	[Signature]
11/8/14	Dr. Shoaib	EO	9:00	OK	[Signature]
12/8/14	Dr. Ayaz	DEO	9:00	OK	[Signature]
15/8	Dr. Ayaz	DEO	9:00	OK	[Signature]
18/8/14	Dr. Shoaib	EO	10:00	OK	[Signature]
22/8/14	Dr. Shoaib	EO	11:00	OK	[Signature]
25/8/14	Dr. Shoaib	EO	9:00	OK	[Signature]
06/09/14	WASIM KHAN	EO	12:00	OK	[Signature]
09/09/14	WASIM KHAN	EO	08:00	OK	[Signature]
12/09/14	WASIM KHAN	EO	10:00	OK	[Signature]
15/09/14	WASIM KHAN	EO	5:00 pm	OK	[Signature]
27/9	Dr. Ayaz	DEO	9:00 pm	OK	[Signature]
26/9	Kamal Shah	EO	3:30 pm	sc/incharge must check and proper maintain handover / being over	[Signature]
				Legislation - Remaining station is satisfactory - management is good	[Signature]
08/09/14	Shaykh	TOX (9/3)	11:00 AM	pl guidelines at being first step staff present - Good	[Signature]
02/10/14	Bashirullah	SHT	9:00 PM	Satisfactory	[Signature]

(2)

(14) 112

Date	Officer	Rank	Time	Remarks	Signature	
4/10/14	Bashir-ullah	SHI	9:30 am	OK		29
4/10/14	Yasir ulamin	SC	14:00 pm	OK		29
05/10/14	Do waseel shah	SC	7:00 am	OK		30
26/10/2014	S. Adil Shah	SPL	11:45 am	OK		31
09/11/14	M. ALI KHAN	SPL	12:00 pm	OK		31
10/11/14	WASIM KHAN	PO	9:00 am	OK		31
24/11/14	S. Adil Shah	RHT	10:15 pm	(OK)		32
25/11/14	Kamul Sudi	EO (P/S)	10:00 am	Neat & Clean Sob		31
27/12/14	Bashir-ullah	SHI	1:00 pm	OK		32
11/12/14	Dr. Shoaib	EO	9:00 am	OK		33
11/12/14	Irfan ullah	SHI	12:40 am	OK		36
13/12/14	B. Rawan	A. SNI	10:30	Needs improvement Remind		37
14/12/14	Bashir-ullah	SHI	6:30	OK		38
15/12/14	Dr. Shoaib	EO	9:00	OK		39
16/12/14	Dr. Shoaib	EO	10:00	OK		30
22/12/14	Dr. Shoaib	EO	9:00	Satisfactory		31
23/12/14	Dr. Shoaib	EO	9:00	Good		31
24/12/14	Dr. Shoaib	EO	10:00	OK		31
25/12/14	Dr. Shoaib	EO	12:00	Satisfactory		31
26/12/14	Dr. Shoaib	EO	3:00 pm	OK		31
29/12/14	Dr. Shoaib	EO	9:00 am	OK		31
30/12/14	Dr. Shoaib	EO	10:00	OK		31
31/12/14	Dr. Shoaib	EO	9:00	Satisfactory		31
1/1/15	Dr. Shoaib	EO	10:00 am	OK		31
2/1/15	Dr. Shoaib	EO	8:00 am	OK		31
5/1/15	Dr. Shoaib	EO	10:00 am	Satisfactory		31
6/1/15	Dr. Shoaib	EO	9:00 am	OK		31
7/1/15	Dr. Shoaib	EO	10:00	Satisfactory		31

- 3. PA to Director General,
- 4. Personal file of the concerned.

AL

OFFICER

3

Sl. No.	Date	Officer	Rank	Time	Remarks	Signature
1	8/1/15	Dr. Shoaib	EO	9:30am	OK	[Signature]
2	9/1/15	Dr. Shoaib	EO	10:00am	Satisfactory	[Signature]
3	20/01/15	M. Amjad	SC	02:00 PM	OK	[Signature]
4	11/01/15	Bakul Rawan	A/Su	7:35 PM	Satisfactory	[Signature]
5	14/1/15	Dr. Shoaib	EO	11:00 AM	OK	[Signature]
6	20/1/15	Dr. Shoaib	EO	9:30	OK	[Signature]
7	21/1/15	Dr. Shoaib	EO	9:00	OK	[Signature]
8	22/1/15	Dr. Shoaib	EO	10:00	Satisfactory	[Signature]
9	23/1/15	Dr. Shoaib	EO	9:30	OK	[Signature]
10	26/1/15	Dr. Shoaib	EO	11:00	OK	[Signature]
11	27/1/15	Dr. Shoaib	EO	13:00	Satisfactory	[Signature]
12	28/1/15	Dr. Shoaib	EO	9:00	OK	[Signature]
13	29/1/15	Dr. Shoaib	EO	10:00	Satisfactory	[Signature]
14	30/1/15	Dr. Shoaib	EO	12:00	OK	[Signature]
15	31/1/15	Dr. Shoaib	EO	10:00	OK	[Signature]
16	31/01/15	Inj. Iqbal	Su	10:15 PM	Satisfactory	[Signature]

Handwritten notes and signatures in the left margin, including a large signature at the bottom.

OK



DIRECTORATE GENERAL OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
GOVERNMENT OF KHYBER PAKHTUNKHWA

091-9222488 Fax: 091-9222487



No.1-26/General/DA-1122/Estt: 1321-25 Peshawar: 17/03/2015

16

To

Mr. Bakht Rawan,
(Station Coordinator),
District Peshawar.

Subject: EXPLANATION

The competent authority noticed with great concern that the state of the art service of Rescue 1122 is deteriorating with every passing day due to your conspiracies against the department which is the only department providing emergency rescue service to the masses entrapped in natural and manmade calamities.

You with malafide intention called a meeting of Station Coordinator, Shift Incharge, Lead Fire Rescuers of District Peshawar and Mardan on 14th March, 2015 at 02:00 PM to invoke the bad sentiments against the officers and department. The meeting you called is against E&D rules and Khyber Pakhtunkhwa Emergency Rescue Service Act 2012 and also against the West Pakistan essential service (maintenance) Act 1958.

Furthermore an affidavit/ undertaking which you signed at the time of appointment also clearly states that you will not indulge in any undesirable activities like ganging up or acts involving moral turpitude.

You have also been found engaging in the spread of false propaganda against the department, institution and the high authorities. You have also been found by forging of false signature of Rescuers in submission of false and baseless allegations to different quarters.

You are directed to explain your position regarding the convening of the meeting and provoking the staff against the department and officers, within the 03 days of issuance this explanation.

In case you failed to make satisfactory reply the strict disciplinary action will be initiated against you under the above mentioned rules.

(DISTRICT EMERGENCY OFFICER)

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa, Peshawar.

Copy to:

1. District Emergency officer, ERS (Rescue 1122), Peshawar, Khyber Pakhtunkhwa.
2. PS to Secretary Relief Rehabilitation & Settlement Department, Govt of Khyber Pakhtunkhwa.
3. PA to Director General, ERS (Rescue-1122), Khyber Pakhtunkhwa, Peshawar.
4. Personal file of the concerned.

(DISTRICT EMERGENCY OFFICER)

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa, Peshawar.

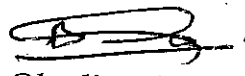
To

Director General
Emergency Rescue Service
Rescue 1122, Peshawar KP

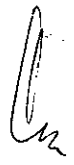
Subject: REPLY TO EXPLANATION

R/sir,

I was ill and taking the medicines yet had not taken the fast. Respectable EO Waseem sahib visit to station 77 keeping in view, the significance of proper channel I wrote down an application free decided monthly offs as well as leave. Also, inform EO sahib by contacting him he allowed me to be at home. In this regard, I had already given a written application to Emergency Officer and District Emergency Officer. In spite of that, explanation is call from me. Kindly, consider the problem on emergency bases.


Your Obedient Rescuer

Bakht Rawan Vise Incharge. Station 33



TO
The Inquiry Officer Emergency Rescue Service 1122, Peshawar

REPLY IN RESPONSE TO THE STATEMENT OF ALLEGATIONS SERVED BY YOUR GOOD SELF
ENDORSMENT NO. NIL DATED. NIL

Most humbly my Para wise reply to the statement of allegations are as under:

That I am the most efficient employee of your good self Department and I have never done such like acts and omissions which your good self leveled against me and statement of allegations issued by your good self.

- 1- That since it is on old issue therefore the said Para is denied.
- 2- That I have not submitted a blank Rota on dated 7/1/2014.
- 3- That the District Emergency Officer did not pay an official visit to 66 station on dated 1/1/2015 anyhow, my administration is upto the mark emergency vehicles or in better condition attendance register, stock register and other official record are will maintained. Rescuers are in proper uniform as they ought to be according to the rules and regulation of our Department.
- 4- I m the most punctual, responsible, careful, obedient and will temper rescuer.
- 5- That allegations leveled against me as per receiving cash is incorrect and need fact finding.
- 6- I belongs to a respectable family I always talked to my seniors in a respectable way and I would do so in the future is well.
- 7- I have always maintained a discipline upto the mark as well as know how and professionalism upto the high level.
- 8- That all the registers and documentations of 66 stations are updated up to date moreover, they are open for impartial inquiry.

It is therefore, most humbly prayed that on acceptance of this reply to the statement of allegations served by good self I may very kindly be exonerated from the charges in light of above facts.

Dated: 3/2/2015

YOUR SINCERELY
B. Rawan
BAKHT RAWAN 3/2/15
Station Coordinator

kg

District Emergency Officer
Emergency Rescue Service 1122
Peshawar.

Subject: Replay to Explanation (No. 2/discipline/pea: -11-15

Respected Sir,

stated in your kind control that on date 08/01/2015 we sharply received an oral message from control room saying that deposit/submit duty rota before 11:00 A.M while it was hard 10:00 A.M.

As, it was for the 1st time a chart in the format of rota in the entire career history of our Service that's why we were ambiguous about the exact number of obb's. be granted to a single rescuer. respected sir, it being the most punctual obedient, professional and devoted rescuer. will make sure to bulbil all the prior necessary documentation in future.

You are requested to accept my replay and kindly expunge my explanation pl:

DE/ (P)

10.9 JAN 2015

SS
09-01-015

Thinking your!
Bakht Yaqoob
Inch-bb-st

put on P. file

Sub Hd

2 P. us

9/1/15
12/1

DE/ (P)
23 JAN 2015

23/1/15

bb-st

To

The District Emergency Office
Emergency Rescue Service 1122

Sub: Explanation replay
Peshawar

Respected sir, replying to explanation no-
2/Discipline/Deo-Pesh/58-63 dated 20/1/15
It is stated in your kind control
that I had reported to station &
had resumed my duty as usual.
I was informed that the uncle
of Dr. Swaid has passed away.

Being suspended I wrote an applicatio
original specimen annexed & left out
the station to participate in funeral
party. more over, you did not marked
me absent in the attendance register
nor enquired about my location &
marked me absent.

23/1/15

1426
23 JAN 2015

put on P. file
23/1/15

Kindly, accept
my replay.
Bakht Rawani
bb-st

h

To

The District Emergency Office,
Emergency Rescue Service, Rescue- 1122,
KhyberPakhtunkhwa, Peshawar.

Subject: REPLY OF EXPLANATION

Respected sir,

In pursuance of explanation No 1-26/General\DA-1122\Estt:1346-50 Peshawar: 18-03-2015, I submit to explain as under:

Allegation of conspiracies against the department, are being committed by us, as alleged in above explanation, we deem conspiracy of any kind against state/department is curse. However, in accordance with constitution & law of state a treatise to eradicate corruption, nepotism, abuse of power, etc. etc. whereby justice & right, etc. could be trampled, are sole obligations & duties of any & every citizen in service or without service. Sir, we did so on 14/03/2015 with verbal permission of director admin. Therefore, we did not commit any unlawful activity.

Sir!

No doubt we rendered affidavit \ undertaking to serve diligently, & honestly without fair & fear according to law of land & justice we have been doing so since joining service rescue-1122 till now & we re-affirm affidavit \ undertaking to fulfill obligations & duties diligently, honestly & without any fair & fear & not to be a tool for unlawful wishes.

Sir!

This explanation note is contempt of Honorable apex Peshawar high court Peshawar order dated 18-03-2015 in writ petition No.182-P/2015, we reserve right of contempt petition if this explanation is not withdrawn (photo copy of order is enclosed).

It is, therefore, requested to very kindly close this explanation in the best interest of justice.

You're obediently,

Date: March 19, 2015

Dispatch No-110

Balich Rawan
SC


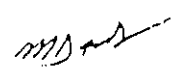
SC

Peshawar
19-MAR

PESHAWAR HIGH COURT PESHAWAR

22 106

ORDER SHEET

Serial No. of Order or Proceedings	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsels where necessary
1	2	3
	18.03.2015	<p><u>WP. No. 182-P/2015.</u></p> <p>Present: Petitioners in person.</p> <p>Syed Qaiser Ali Shah, AAG, for the respondents.</p> <p>*****</p> <p>Final opportunity rendered to file their comments before the next date of hearing. Adjourned to 26.03.2015.</p> <p>Till then, the impugned appointment process may continue, however, no final order in this regard be made till the date fixed.</p> <p>The attention of the Court was drawn to the fact that respondents are asserting undue influence over some of the petitioners to detract them from their stance taken in the present petition. The worthy AAG present in Court is directed to put the respondents on notice that in case of pressure or influence by the respondents, in any manner, whatsoever, they shall expose themselves to penal action by the Court.</p> <p style="text-align: right;">  JUDGE </p> <p style="text-align: right;">  JUDGE </p>

Dispatch NO-110

hsan

CERTIFIED TO BE TRUE COPY

Examination
 Peshawar High Court
 19-MAR-2015

To

The Director General Rescue 1122,
Khyber Pakhtunkhwa Peshawar.

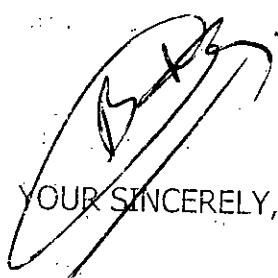
**REPLY IN RESPONSE TO THE SHOW CAUSE NOTICE
DATED 19.2.2015 COMMUNICATED TO THE APPELLANT
ON 21.2.2015**

Most humbly my Para wise reply to the show cause notice are as under:-

- 1- That since it is an old issue therefore, the said Para is denied. Further more on dated 23.08.2011 due to illness i.e: Malaria which was further converted to Typhoid I submitted application for leave which was accepted by the competent authority by allowing me leave but inspite of that I was marked absent quite illegally.
- 2- Incorrect I have not submitted blank Rota on dated 7/1/2014 therefore the instant para is denied.
- 3- Incorrect I have never ever been suspended on dated 12.1.2014.
- 4- On dated 20.1.2015 being suspended I had written a short leave application and had left far to participate in the funeral prayer of the causin of Dr. Shoab Emergency Rescue Service 1122. The copy of that short leave is attached. Moreover DEO didn't mark me absent in the attendance register. Copy is annexed.
- 5- That the FIR registered against me was the result of misunderstanding between me in Director Operational neither I have threatened him nor I would do so in the future as well. Moreover we have reached to mutual consensus on dated 23.2.2015. Written copy of compromise deed is attached.
- 6- On dated 1.1.2015 the Director Operations did not visit our station. Further more he visited our station on dated 20.1.2015 and according to his remarks every thing is okay. Copy of visiting register is annexed. Any how my administration was up to the mark emergency vehicles were in better condition attendance register, stock register and other official record were well maintained. Rescuers were in proper uniform.

It is therefore, most humbly prayed that on acceptance of this reply to the show cause notice I may very kindly be exonerated from the charges which has been leveled against me.

Dated: 26/02/15


YOUR SINCERELY,

**BAKHT RAWAN
(STATION COORDINATOR)**

ERC (Rescue 1122), Peshawar

Duty No: 076

Date: 26-02-15

SEEN BY	
Charge hand	
Director	

[Handwritten notes and signatures in the bottom left corner]

The Ho/c officer to rescu
11 22 Resn.

24

Sub: APP for Leave.

H/Sir,

Humly stated in your

Honour that my wife is ill.

I have to go to home.

Kindly allow me Three leave

on dated 18, 19, 20.

Allow 3 days leave

A file
14/4/2011

Thanking
you.

Bakul Rawan
Sc/SHI 33-8/11

ls

To

The EO
ERS 1122
Peshawar (KPK)

R/Sir,

It is humbly requested that
i am going to Bajaur Agency at home
which is faraway from Peshawar.

Therefore i request to allow me 2 day leave
and 2 day Reliance e 5 monthly off.

I will be very Thankful

Yours Thankful
Bakht Rawan SC
33 Station.

To

Soft + 2 beave

Allow

Plz file ^{24/5/2011}

Please Put in P/B
for record

h

مفتی محمد رفیع الرحمن صاحب مدظلہ العالی
مفتی صاحب!

مفتی صاحب! درستی ہو، گارینٹ والے۔ اور سب سے پہلے جاننا چاہیے

کس وقت سے سب سے پہلے گارینٹ والے کے باج OFF کرنا ہے

مفتی صاحب! سب سے پہلے گارینٹ والے کے باج OFF کرنا چاہیے

دو، تین، چار، پانچ، ست، آٹھ، نو، دس

مفتی صاحب!

الکالین اور نوم 2011-27-19

From 21-27 upto

الکالین، سب سے پہلے
se/SMI کے سٹیشن

recommended to honorable
E/O sb for further consid-
eration plz!

B. P.
19/7/11

Allow 5offs + 2 Rebrun

From 21-27/7/2011

[Signature]
19/7/2011



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
 HOME & TRIBAL AFFAIRS DEPARTMENT
 GOVERNMENT OF KHYBER PAKHTUNKHWA
 091-2264223-4-5 2263158 Fax: 091-2263159
 ersrescue1122kpk@yahoo.com



APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Baqul Nawaz
02	Father's Name	Khan Pacha
03	Designation	SC/SHI
04	Place of duty	Station: <u>33</u> Vehicle: _____ Shift: _____
05	Days & Date from which the leave is required	Days: <u>21/22/02</u> - <u>21/02</u> From Date: <u>21/02</u>
06	Nature of leave	Casual Leave/Earned Leave/Medical Leave
07	Reason for leave	Home mother ill
08	Address if to proceed outside the city	
09	Valid Phone No:	03463875785

Baqul Nawaz 19/07/11

Applicant's Signature

Date: _____

Reliever's Name	Desg:	Duty/Shift	Date	Signature	Contact Number
Sajawal	SI	Morning	21/07	<u>Sajawal</u>	0321-9391122
M. Sajawal	SI	Morning	22/07	<u>Sajawal</u>	same

Sajawal

SHI's Signature

ESTABLISHMENT REPORT

Leave Record	Availed		Balance
--------------	---------	--	---------

Recommended/Not Recommended

Sanctioned

Signature of forwarding officer
 Name: WASIM KISHAN
 Designation: PO
 Stamp: [Signature]
19/7

Sanctioning Authority
 Name: _____
 Designation: _____
 Stamp: _____

29



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA
091-2261223-4-5 2263158 Fax: 091-2263159
• ersrescue1122kpk@yahoo.com

APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Bareen Khan
02	Father's Name	Abdul Rehman
03	Designation	Vehicle Ins.
04	Place of duty	Station: 33 Vehicle: _____ Shift: 8:15/11:15
05	Days & Date from which the leave is required	Days: 3 / Three From Date: 27 - 29/08
06	Nature of leave	Casual Leave/ Earned Leave/ Medical Leave
07	Reason for leave	Leaving Family Bazaar
08	Address if to proceed outside the city	v/p.o. Khan Khawab Bazaar
09	Valid Phone No:	0846-3875285

Bareen Khan
Applicant's Signature
29/8/11

Date: _____

Reliever's Name	Desg:	Duty/Shift	Date	Signature	Contact Number

SHI's Signature

ESTABLISHMENT REPORT

Leave Record	Availed		Balance	
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Recommended/Not Recommended

Sanctioned

Signature of forwarding officer
Name: WASIM KHAN
Designation: DEO
Stamp: [Signature]
29/8

Sanctioning Authority
Name: Ayaz
Designation: DEO
Stamp: [Signature]
29/8

بابت سٹیٹ ایئر لائنز کی سفر اخراجات 11/22 سے 12/22
بابت علی

off, 02 5
موجودہ سہ ماہی کے دوران

بابت سٹیٹ ایئر لائنز کی سفر اخراجات 27 تاریخ کو
اور 28، 29 کو جو سہ ماہی کے

تعداداً 1000 روپے کے لئے
مقرر کیا گیا

Dates: 27, 28, 29

Also a sum leave on
the 26 is to this month
if agreed P/E!

ایئر لائنز کی
بابت اخراجات
33-81

h



**DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA**
091-2264223-4-5 2263158 Fax: 091-2263159
ersrescue1122.pk@yahoo.com



31

53

APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Bakht Rawan
02	Father's Name	Rham Raehai
03	Designation	SE/SHI
04	Place of duty	Station: 33 Vehicle: — Shift: Morning
05	Days & Date from which the leave is required	Days: 03 Leaves + 04 off From Date: 09, 11, 12 - 09 - 2011
06	Nature of leave	Casual Leave/ Earned Leave/ Medical Leave
07	Reason for leave	Sickness
08	Address if to proceed outside the city	Bayan Agency
09	Valid Phone No:	

Date: 09-08-2011


 Applicant's Signature

Reliever's Name	Desg:	Duty/Shift	Date	Signature	Contact Number


 SHI's Signature

ESTABLISHMENT REPORT

Leave Record	Availed	Balance

Recommended/Not Recommended

Sanctioned

Signature of forwarding officer

Name: WATSON KATON

Designation: 30

Stamp: 10/10

Sanctioning Authority

Name: _____

Designation: _____

Stamp: _____

Rejected he should
 immediately report to
 the office street
 with his file

کفیلہ کے لئے درخواستیں اور درخواستیں

کفیلہ کے لئے

گزشتہ دنوں کے لئے طبیٹ شدید عرب میں اور سائل 13/8
 کے روز ادویات استعمال کرنا تھا۔ لیکن جب سائل کے حالت ایشیا کے عرب میں
 اور سائل نے گھر جانے کا ارادہ کیا۔ جب سائل نے وسم (E.O) کو لکھی
 اپنے غزلیں سے فون کیا تو وسم نے کہا کہ وہ اس وقت 77 مہینے
 کے کام میں غزلیں سے جا رہا ہے۔ اور سائل کو فون پر یہ کہہ کر جانیں اہلکار دہری
 سائل نے اپنی درخواست سیشن میں لکھو کر ایشیا کے عرب طبیٹ کے کارڈ روانہ ہوا
 لیکن جب اگلی دن وسم نے 33 مہینے کا ورڈ کیا اور سائل نے بار بار کہا
 اس کے اہلکار نہیں لی اور اسے غیر جانور لکھا گیا

جب تک عالی! چونکہ سائل اہلکار کے لئے تھا اور اسے غیر جانور کا کارڈ دیا گیا
 اس لیے آپ جان سے اتنا ہی کہ سائل نے خود اس سے وسم کا ایشیا کے عرب اور سائل
 غیر جانور کو لکھی لکھی ہے

13/08/11
 Recommended
 to non-removable
 D.E.O
 immediate
 N/A P/2!

13-08-11
 HIS 4 offe may knely
 adjust with in 3 Absence

[Signature]

13/8
 N/A please

13/8
 cel Station 33

13/8
 101
 report is already send to
 705 very important to report
 13/8

33




DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122)
HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF JHARKHAND
091-22647... Fax: 091-2263159
www.jharkhand.gov.in



APPLICATION FOR CASUAL LEAVE

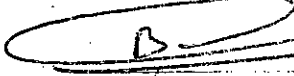
01	Name of the Applicant	Baani Rawan
02	Father's Name	Uday Prasad
03	Designation	Incharge 33-ST
04	Place of duty	CCR Konatee
05	Days & Date from which the leave is required	33 PF03-12 PA-05-06 Shift: (M) (E) (N) Days: 04 / <u>FOUR (Leave)</u> From Date: 13, 14, 15, 16
06	Nature of leave	Casual Leave / Paternal
07	Reason for leave	wife-illness Fallopian tube Problem
08	Address if to proceed outside the city	Vand P.O Kherkanolchav Bajaur. A
09	Valid Phone No:	03463875785

Date: _____


 Applicant's Signature 33-ST

Reliever's Name	Desg:	Duty/Shift:	Date	Signature	Contact Number
			?		

Also a sui leave P12!

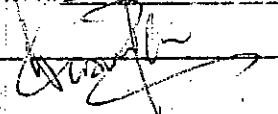

 V/Inch-33-ST

ESTABLISHMENT REPORT


Leave Record	Availed	Balance
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Recommended / Not Recommended: _____

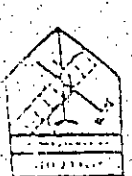
Sanctioned:

Signature of forwarding officer
Name: W. R. M. KHAN
Designation: EO
Stamp: 

3 days

Sanctioning Authority
Name: DR. Anand
Designation: Deo.
Stamp: 
6-12

P-V



**DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122)**

HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF PUNJAB PAKHTUNKHWA

091-2261211, 091-2263159 Fax: 091-2263159
www.punjab.gov.pk

APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Baqir Khan
02	Father's Name	Khan Khan
03	Designation	W/and 33-SI
04	Place of duty	Station: 33 Shift: M → E → N
05	Days & Date from which the leave is required	Days: 05 From Date: 1/11-10 to 05/11/11
06	Nature of leave	Casual Leave / Earned Leave 4 off's one leave
07	Reason for leave	Leaving of Paternal home
08	Address if to proceed outside the city	V.P.O. Khanawar Sahi
09	Valid Phone No.	0346-3875785

(Signature)

Date: 30/10/11

Reliever's Name	Desg.	Day/Shift	Date	Signature	Contact Number

ESTABLISHMENT REPORT

Leave Record	Avalied	Balance
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Recommended / Not Recommended

Signature of forwarding officer

Name: *Shahid*

Designation: *F.O.*

Stamp: *(Signature)*

Sanctioning authority

Name: *Shahid*

Designation: *Deo.*

Stamp: *(Signature)*

(Signature)

Sanctioned

24

ST

35

DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
 HOME & TRIBAL AFFAIRS DEPARTMENT
 GOVERNMENT OF KHYBER PAKHTUNKHWA
 091-2264223-4-5 2263158 Fax: 091-2263159
 ersrescue1122kpk@yahoo.com



APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Bakht Rawan		
02	Father's Name	Khan Rameez		
03	Designation	V/Asst. Insp.		
04	Place of duty	ICFH	Station: EO	Vehicle: PA, 10, 12 P
			Shift: M-2-N	
05	Days & Date from which the leave is required	Days: 04 From Date: 10, 11, 12, 13		
06	Nature of leave	Casual Leave/Earned Leave/Medical Leave		
07	Reason for leave	Wife Illness		
08	Address if to proceed outside the city	Khan Rameez		
09	Valid Phone No:	Khan Rameez		

Date: _____

Applicant's Signature

Reliever's Name	Desg:	Duty/Shift	Date	Signature	Contact Number

Also
 receipt
 dated 9/04/11
 P.12

SHI's Signature 06/04/11

ESTABLISHMENT REPORT

Leave Record	Availed		Balance
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Recommended/Not Recommended

Signature of forwarding officer

Name: _____

Designation: _____

Stamp: _____

Sanctioned

Sanctioning Authority

Name: D. Shabbir

Designation: EO

Stamp: _____

Accept these 3 days
 P.12
 9/4/12

27/07/12

P.T.U



**DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA**
091-2264223-4-5 2263158 Fax: 091-2263159
ersrescue1122@yahoo.com

35



APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Bakht Rawan
02	Father's Name	Khan Pachai
03	Designation	Station Co-ordinator
04	Place of duty	Station: 66 - Vehicle: _____ Shift: Morning
05	Days & Date from which the leave is required	Days: 04 From Date: 12-05-12 To 15-05-12
06	nature of leave	Casual Leave/ Earned Leave/ Medical Leave
07	Reason for leave	Wife check up.
08	Address if to proceed outside the city	Mardan
09	Valid Phone No:	0346-3875785

Date: 08/05/12

[Signature]
Applicant's Signature

Reliever's Name	Desg:	Duty/Shift	Date	Signature	Contact Number
Forwarded To EO					

Forwarded To EO
[Signature] "SC"
(66)
08/05/2012

SHI's Signature

ESTABLISHMENT REPORT

Leave Record	Availed	Balance

Recommended/Not Recommended

Sanctioned /

Signature of forwarding officer

Name: *Dr. Shereh*

Designation: *EO*

Stamp: *[Signature]*

9/5/12

Sanctioning Authority

Name: _____

Designation: _____

Stamp: *[Signature]*

*P. J. & Informal
only 2 days
renewed*

27/07/12

P. J. U

[Signature]



37

APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Bankhi Rawan
02	Father's Name	Khan Pachai
03	Designation	"SC"
04	Place of duty	Station: 66- Vehicle: - Shift: Morning
05	Days & Date from which the leave is required	Days: 05 days From Date: 16-20 June 2012
06	Nature of leave	Casual Leave/Earned Leave/Medical Leave
07	Reason for leave	Domestic Problems.
08	Address if to proceed outside the city	Bayaur Agency
09	Valid Phone No.	0346-3875785

Date: 12/06/12

Applicant's Signature

Forwarded to EC
for F/M "SC"
(66)
12/06/12

Reliever's Name	Desg.	Duty/Shift	Date	Signature	Contact Number

SH's Signature

ESTABLISHMENT REPORT

Leave Record	Availed	Balance	
--------------	---------	---------	--

Recommended/Not Recommended

Sanctioned ✓

Signature of forwarding officer: *[Signature]*
Name: *[Blank]*
Designation: *[Blank]*
Stamp: *[Blank]*

Sanctioning Authority
Name: *[Blank]*
Designation: *[Blank]*
Stamp: *[Blank]*

Information file on by (03 days)

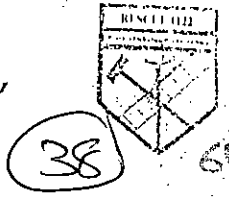
27/07/12

P.T.O

[Signature]



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
 HOME & TRIBAL AFFAIRS DEPARTMENT
 GOVERNMENT OF KHYBER PAKHTUNKHWA
 091-2261223-4-5 2263158 Fax: 091-2263159
 ersrescue1122.pk@yahoo.com



APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Bakul Raway	
02	Father's Name	Ghar Pachal	
03	Designation	SC	
04	Place of duty	Station: 66	Vehicle: _____
		Shift: morning	
05	Days & Date from which the leave is required	Days: 03 / Three	
	28/07/12 - 30/07/12	From Date: 28-07-12	
06	nature of leave	Casual Leave/ Earned Leave/ Medical Leave	
07	Reason for leave	Home Construction	
08	Address if to proceed outside the city		
09	Valid Phone No:	0346-3875785	

Date: 27-07-12

[Signature]
 Applicant's Signature
27/07/12

Reliever's Name	Desg:	Duty/Shift	Date	Signature	Contact Number

[Signature]
 S.H.'s Signature

ESTABLISHMENT REPORT

Leave Record	Availed	Balance	
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Recommended / Not Recommended

Sanctioned

Signature of forwarding officer
 Name: Bakul Raway
 Designation: S.H.I.
 Stamp: *[Signature]*

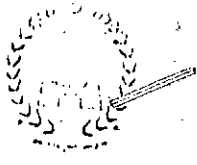
*Forwarded to DEO
 on 28/7/12
 [Signature]*

Sanctioning Authority
 Name: _____
 Designation: _____
 Stamp: _____

*Forwarded to E.O/DEO
 for further action*

*only 03 days
 12 July
 inform concerned S.H.*

*27/07/12
 A.T.O*



**DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA**
091-2261223-4-5 2263158 Fax: 091-2263159
rescue1122pk@yahoo.com



39

APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Balal Rawan
02	Father's Name	Chay Pachai
03	Designation	SC
04	Place of duty	KTH 66-ST Station: 66 Vehicle: _____ Shift: Morning
05	Days & Date from which the leave is required	Days: 20/ twintly From Date: 25/9 - 24/9/12
06	Nature of leave	Casual Leave/Earned Leave/Medical Leave
07	Reason for leave	M.A Eng previous exam
08	Address if to proceed outside the city	Khanicome/Chay Bafallr
09	Valid Phone No:	02463875785

Date: _____

[Signature]
30/8/12
Applicant's Signature

Reliever's Name	Desg:	Duty/Shift	Date	Signature	Contact Number

may be allowed
forward to E.O sb for further
Action. *31/8/12*

[Signature]
SHI's Signature

Leave Record	Availed	Balance
--------------	---------	---------

Recommended/Not Recommended
May be allowed

Sanctioned

Signature of forwarding officer: *[Signature]*
Name: Dr. Shaeesh
Designation: EO
Stamp: *[Stamp]*
31/8/12

Sanctioning Authority
Name: _____
Designation: _____
Stamp: _____

[Signature]
21/8/2011

[Signature]
21/8



40

65

DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA



No.1-11/Leave/DG-1122/Estt/ 4407-11

Peshawar: 6-9-2012

OFFICE ORDER

Consequent upon the approval of the competent authority Mr. Bakht Rawan S/o Khan Pachai - Station Coordinator, Station-66 is hereby granted 10 days earned leave on 05, 06, 11, 12, 16, 17, 18, 20, 21 and 22 September 2012, vide his application dated: 30-08-2012.

(DEPUTY DIRECTOR)

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa.

Copy to:-

1. District Emergency Officer, Emergency Rescue Service (Rescue - 1122), Peshawar.
2. Station House Incharge, Station-66, Emergency Rescue Service (Rescue 1122), Peshawar.
3. PA to Director General, Emergency Rescue Service (Rescue - 1122), Peshawar.
4. Personal file of the concerned.

(DEPUTY DIRECTOR)

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa.



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122)
HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA
091-2264223-4-5 2263158 Fax: 091-2263159
ersnrescue1122kpk@yahoo.com



41

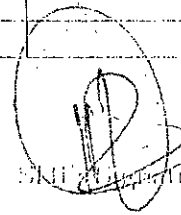
APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Bakht Rawan
02	Father's Name	Khan Pachai
03	Designation	SC
04	Place of duty	Station: 77 Vehicle: _____ Shift: (M)
05	Days & Date from which the leave is required	Days: 03 From Date: 06, 07, 08/03/13
06	Nature of leave	Casual Leave/ Earned Leave (Medical Leave)
07	Reason for leave	Call tract problem +
08	Address if to proceed outside the city	Indigiton.
09	Valid Phone No:	

Date: 04/03/13

 04/03/13
Applicant's Signature

Reliever's Name	Desg:	Duty/Shift	Date	Signature	Contact Number

 04/03/13
Signature

ESTABLISHMENT REPORT

Leave Record	Availed	Balance

Recommended/Not Recommended

Sanctioned

Signature of forwarding officer

Sanctioning Authority

Name: _____

Name: _____

Designation: _____

Designation: _____

Stamp: _____

Stamp: _____

Forward to B.O for
Recommendation P19



no leave
no reliever
no off or

04/03/13

30 days
12 Feb
SITK 77/13

1623

92



DIRECTORATE OF
 EMERGENCY RESCUE SERVICE (RESCUE - 1122),
 HOME & TRIBAL AFFAIRS DEPARTMENT
 GOVERNMENT OF KHYBER PAKHTUNKHWA
 091-2264223-4-5 2263153 Fax: 091-2263159
 ersrcsue1122@kpk.gov.pk@yahoo.com



APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	BAKHT Rawan
02	Father's Name	Khan Pachai
03	Designation	
04	Place of duty	Station: <u>CC</u> Vehicle: <u>FFS PAK</u> Shift: <u>M-S-N</u>
05	Days & Date from which the leave is required	Days: <u>one / one</u> From Date: <u>11/04/13</u>
06	Nature of leave	Casual Leave / earned Leave / Medical Leave
07	Reason for leave	Religious festival nephew
08	Address if to proceed outside the city	Mardan at Zal Khan Colo
09	Valid Phone No:	0346 3875785

Date: 10/04/13

B.R.
Applicant's Signature 10/4/13

Reliever's Name	Desig	Duty/Shift	Date	Signature	Contact Number

B.R.
SHF's Signature 10/4/13

ESTABLISHMENT REPORT

Leave Record	Availed	Balance
--------------	---------	---------

Recommended / Not Recommended Sanctioned

Signature of forwarding officer
 Name: _____
 Designation: _____
 Stamp: _____

Sanctioning Authority
 Name: _____
 Designation: _____
 Stamp: _____

Designation: _____
 Stamp: _____

Name: _____
 Designation: _____
 Stamp: _____

(01)

35/14



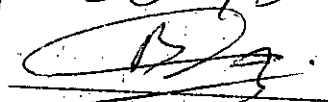
DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
 HOME & TRIBAL AFFAIRS DEPARTMENT
 GOVERNMENT OF KHYBER PAKHTUNKHWA
 091-2261223-4-5-2263155 Fax: 091-2263159
 ersrescue1122kpk@yahoo.com



APPLICATION FOR CASUAL LEAVE


01	Name of the Applicant	Bakht-Rawan
02	Father's Name	Khan Pachai
03	Designation	A-SHI
04	Place of duty	66-St KTH
	Station:	66
	Vehicle:	M
	Shift:	M-S-N
05	Days & Date from which the leave is required	Days: One/One/001
	From Date:	26/04/13
06	Nature of leave	Casual Leave/ Earned Leave/ Medical Leave
07	Reason for leave	Wife - Illness
08	Address if to proceed outside the city	Mardan Azizal Khan c/o
09	Valid Phone No:	0346 3875785

Date: _____


 Applicant's Signature

Reliever's Name	Desg.	Duty/Shift	Date	Signature	Contact Number

ESTABLISHMENT REPORT


 SHI's Signature
 25/04/13

Leave Record	Availed	Balance
Recommended / Not Recommended	Sanctioned	

Signature of forwarding officer
 Name: _____
 Designation: _____
 Stamp: _____

Sanctioning Authority
 Name: _____
 Designation: _____
 Stamp: _____



25/4



**DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA**
091-2264223-4-5 2263158 Fax: 091-2263159
ersrescue1122kpk@yahoo.com

71
44

APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	Bacchi Khan
02	Father's Name	Khan / Achai
03	Designation	
04	Place of duty	Station: 66 Vehicle: PA-11,12 Shift: All m-e
05	Days & Date from which the leave is required	Days: 02/Two From Date: 21/06/13
06	nature of leave	Casual leave/ Earned Leave/Medical Leave
07	Reason for leave	Mother ill/ rest
08	Address if to proceed outside the city	Ajzal Khan Lal Colony Mardana
09	Valid Phone No:	03463875785

Date: 22/06/2013

Applicant's Signature

Reliever's Name	Desg:	Duty/Shift	Date	Signature	Contact Number

SHI's Signature 22/06/13

ESTABLISHMENT REPORT

Leave Record	Availed	Balance
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Recommended/Not Recommended

Sanctioned

Signature of forwarding officer

Name: _____

Designation: _____

Stamp: _____

Sanctioning Authority

Name: _____

Designation: _____

Stamp: _____

Forward to:
EC/DEC for RIA/pla
26/06/13

DEC (P)
ER

20/6/13



45

74

RESCUE 1122
Govt of Khyber Pakhtunkhwa

DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
GOVERNMENT OF KHYBER PAKHTUNKHWA
info@rescue1122kpk.com www.rescue1122kpk.com

No.1-11/leave/DG-1122/Estt: 6384-87 Peshawar: 25-8 -2014

OFFICE ORDER

Consequent upon the approval of the competent authority, Mr. Bakht Rawan S/O Khan Pachai (Station Coordinator) Station-66 Khyber Pakhtunkhwa Emergency Rescue Service (Rescue-1122) Peshawar is hereby granted 05 days Casual Leave on dated 16th, 21st, 26th, 30th August 2014, and 04th September 2014, on full pay.

On the expiry of leave, the official is likely to return to the same post and station.

SUPERINTENDENT
Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa

Copy to:-

1. District Emergency Officer, ERS (Rescue-1122) Peshawar.
2. PA to Director General, ERS (Rescue-1122), Khyber Pakhtunkhwa.
3. Official Concerned.
4. Personal file of the concerned.

SUPERINTENDENT
Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa

DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RUSCUE - 1122),
HOME & TRIBAL AFFAIRS DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA
091-2264223-4-5 2264158 Fax: 091-2263159
rscue@kpk.gov.pk @raheo.com



46

APPLICATION FOR CASUAL LEAVE

01	Name of the Applicant	BARKH RAWAN
02	Father's Name	KHAN PACHAI
03	Designation	SC/A-SHI
04	Place of duty	Station: 66 Vehicle: PF-6 PA 11/4/12 Shift: (M)
05	Days & Date from which the leave is required	Days: 15 / Fifteen. From Date: 16 th , August onwards
06	Nature of leave	Casual Leave/Earned Leave/Medical Leave
07	Reason for leave	M-A Eng Final exam.
08	Address if to proceed outside the city	ADZAR KHAN TOWN MARDAN.
09	Valid Phone No:	0346-387585

Date: 12/8/14

Applicant's Signature
12/8/14

Reliever's Name	Desg.	Duty/Shift	Date	Signature	Contact Number

Shif's Signature
12/8/14

ESTABLISHMENT REPORT

Leave Record	Availed	Balance

Recommended/Not Recommended

Sanctioned

Signature of forwarding officer

Sanctioning Authority

Name: _____

Name: _____

Designation: _____

Designation: _____

Stamp: _____

Stamp: _____

G.O.

May allow for 15 days - P2

17/8

Put on file
12/8/14

Suppl
A/E

13/8

To

The Director General,
Emergency Rescue Service Rescue-1122,
Khyber Pakhtunkhwa Peshawar.

Subject: APPLICATION FOR LEAVE REGARDING M.A (FINAL) ENGLISH LITRATURE EXAM.

Respected sir,

With profound reverence it is stated in your kind control that our exam is going to commence on from the 16th of this month which will go ahead up to 4th of September and will be followed by viva voca immediately.

Your honor, I would request you to allow me at least fifteen (15) days leave to have a panoramic view of the course concerned pleas.

Dated: 12/8/2014

Thanking Your !

*B.A.
12/18/14
Forwarded to
resp S.O SB Doc
Quitted N/A Piz!*

B.A.

Bakhtrawan
Station Coordinator/A-SHI 66-St
ERS Rescue-1122.

*Amir
12/8*

ll

To

The District Emergency Officer
ERs 1122 Peshawar.

Title: Short Leave:

Respected Sir, the Uncle of ^{Sb} Dr - Shouab
was passed away. I have to participate
in his funeral. Kindly, allow me.

Dated: 20/1/15

Thanking you!
M. Bakht Rawan
66-St.

Witness is
A. Tariq
A. Jaleel

Am

(49)

To
The District Emergency Officer
ERs 1122 Peshawar.

Title Short Leave

Respected Sir, the Uncle of Dr. S
was passed away.

I have to participate
in his funeral.

Kindly, allow me.

Thanking you!
M. Mallis
Bakht Rawan
66 St.

h

ac

جنوری 2011ء میں ایف ایف ایف کے ساتھ ساتھ
کھنور ایب ڈیٹو کے ساتھ ساتھ

ایب ڈیٹو

عنوان: درخواست برائے ایف ایف ایف کے ساتھ ساتھ

تقریباً یہ درخواستیں ایب ڈیٹو کے ساتھ ساتھ
ایب ڈیٹو سے ایف ایف ایف کے ساتھ ساتھ
ایب ڈیٹو کے ساتھ ساتھ
ایب ڈیٹو کے ساتھ ساتھ

ایب ڈیٹو کے ساتھ ساتھ
ایب ڈیٹو کے ساتھ ساتھ

ایب ڈیٹو کے ساتھ ساتھ

ایب ڈیٹو کے ساتھ ساتھ

consideration as well as
necessary action
needed to E.O so PIZ!

B.P
20/8/11

Forward to DBO

24/8/2011

Adjust this accordingly
to your letter

20/8

OFFICE OF THE DISTRICT EMERGENCY OFFICER

Khber Pakhtunkhwa Emergency Rescue Service
(Rescue-1122) Peshawar.

No.4/DEO-Pesh/GEN/100-03

Peshawar Dated: 28/07/2015

To

The Superintendent of police
Peshawar Cantt.

Subject: - Request for Lodging FIR against Mr. Bakhthrawan

Dear Sir,

With reference to the subject cited above it is submitted that the undersigned received some threats from Mr. Bakhthrawan through a call, at my cell phone (0333-9128713) on dated 22-01-2015 when present in this office.

The said person is also a Government employee of this organization i.e. Khyber Pakhtunkhwa Emergency Rescue service (Rescue-1122) as Station Coordinator, (BPS-14) working in Rescue Station-66 located near Khyber teaching hospital and a permanent resident of Bajaur.

Your good office is therefore, requested that First information Report (FIR) may be registered against the said person under the relevant section of Pakistan panel code and other relevant rules.

Your kind cooperation will highly be appreciated.

(DIRECTOR OPERATIONS)

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa.

Copy to:-

1. Station House Officer, University Town Peshawar.
2. PA to Director General, ERS (Rescue 1122), Khyber Pakhtunkhwa.
3. Office file.

(DIRECTOR OPERATIONS)

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa.

ابتدائی اطلاعی رپورٹ

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 152 مجموعہ ضابطہ فوجداری

فارم نمبر 23-15 (1)

ضلع پشاور شہری

تاریخ 15/02/2015 دفتر کی اوقات

16 مئی 52

رٹ	28 دفتر کی اوقات جالندہ 14135
کارندہ مستثنیت	ڈاکٹر آغا رضوان ڈاکٹر ابرارہ ریسکیو 1122
(معدومہ) حال اگر کچھ لیا گیا ہو۔	1508 / 250 ٹیلی (اف) ریلنگ
بقاعدے اور سمت	دفتر ریسکیو 1122 واقع شہر ٹیکہ سولہ
	بچے نروان ملانیم ریسکیو 1122
بچے متعلقہ کی کمی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	سائنس رپورٹ مہولہ کی طرف سے درج شدہ کیس کے بارے میں
کی تاریخ و وقت	پہلے ڈاکٹر

ابتدائی اطلاع نیچے درج کرو۔ ایک تحریری اطلاع بوساطت افسران یا دہ
 نجی یا مستثنیت خانہ سے یہ وصول ہو جس پر حسب رٹ DPP مہولہ کی طرف سے
 یاد پڑھا وہ مہولہ کی طرف سے درج شدہ اور مہولہ کی طرف سے مہولہ کی طرف سے
 مہولہ کی طرف سے درج شدہ اور مہولہ کی طرف سے مہولہ کی طرف سے مہولہ کی طرف سے
 office of the district judge 3/15 Shaukhat
 emergency officer higher rank in the area of the
 Rescue service Rescue 1122 Peshawar to the superintendent of police
 Peshawar comm. subject Request for lodging FIR against Mr.
 Bakhtawan. dead s/o with reference to the subject cited above
 it is submitted that the under signed received some threats
 from Mr. Bakhtawan through a call, at my cell phone (393
 2/28713) on dated 22-01-2015 when present in this office
 The said person is also a government employee of this organization
 i.e. Khyber Pakhtunkhwa Emergency Rescue service Rescuer
 as station coordinator, permanent resident of Bajaur, your good
 office is therefore requested that first information report may
 be registered against the said person under the relevant section of
 Pakistan Penal code and other relevant & all your kind cooperation
 You will highly be appreciated. Datta Ayaz Director operation
 Emergency Rescue service Rescue 1122 Khyber Pakhtunkhwa
 مہولہ کی طرف سے درج شدہ اور مہولہ کی طرف سے مہولہ کی طرف سے مہولہ کی طرف سے
 مہولہ کی طرف سے درج شدہ اور مہولہ کی طرف سے مہولہ کی طرف سے مہولہ کی طرف سے
 مہولہ کی طرف سے درج شدہ اور مہولہ کی طرف سے مہولہ کی طرف سے مہولہ کی طرف سے

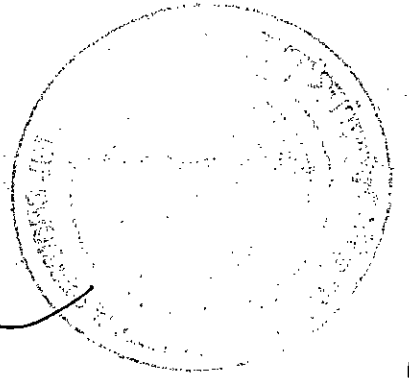
3
 M. S. Khan

(53) بعد ازاں جناب سید صاحب نے تصدیق فرمائی اور
بابت 2000 روپے کے حوالے کی گئی ہے۔

وقت دوران و لا خانہ کتبستان فاروقیہ اسلامیہ فیصلہ فرمایا جو 11/12/22
تاریخ 26/15/22

26/15

نام



1277

M/O
6/2/22

ڈاکٹر ابراہیم رضا خان ڈاکٹر ابراہیم رضا خان
11/12/22

دفعہ اول کے تحت مندرجہ ذیل کے حوالے کی گئی ہے۔
تاریخ 26/15/22

28

25D

... کے حوالے کی گئی ہے۔

بابت 2000 روپے کے حوالے کی گئی ہے۔
تاریخ 26/15/22

بابت 2000 روپے کے حوالے کی گئی ہے۔
تاریخ 26/15/22

ATTESTED

بہتر سائل / مندرجہ ذیل کے لئے اور تا کہ وہ سب سے

بہتر سائل / مندرجہ ذیل کے لئے اور تا کہ وہ سب سے دائرہ کار سے

بہتر سائل / مندرجہ ذیل کے لئے اور تا کہ وہ سب سے

بہتر سائل / مندرجہ ذیل کے لئے اور تا کہ وہ سب سے 182/2015

(دست کا پی بچہ نام دستاویزات لیا)

Handwritten signature

بہتر سائل / مندرجہ ذیل کے لئے اور تا کہ وہ سب سے

بہتر سائل / مندرجہ ذیل کے لئے اور تا کہ وہ سب سے

بہتر سائل / مندرجہ ذیل کے لئے اور تا کہ وہ سب سے

بہتر سائل / مندرجہ ذیل کے لئے اور تا کہ وہ سب سے

بہتر سائل / مندرجہ ذیل کے لئے اور تا کہ وہ سب سے

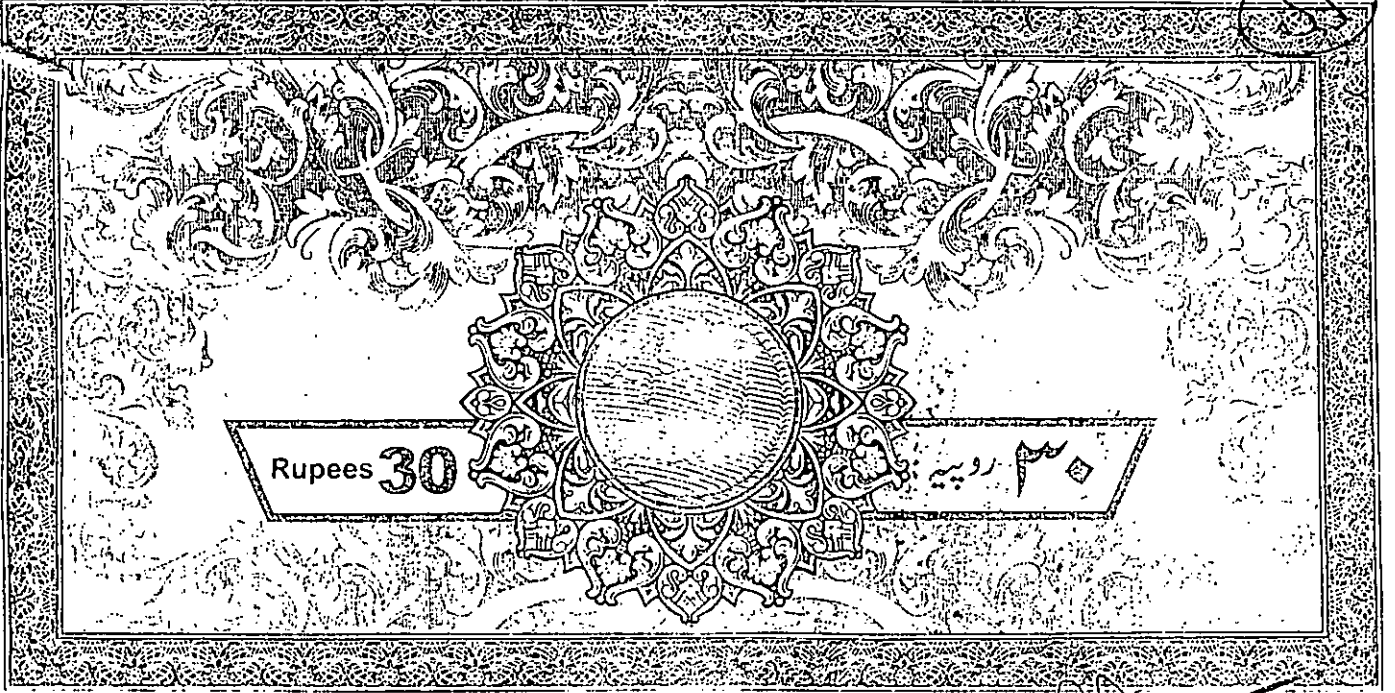
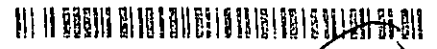
Handwritten notes and signature on the right side

6/1/2015

ATTESTED OATH COMMISSIONER

بہتر سائل / مندرجہ ذیل کے لئے اور تا کہ وہ سب سے

Handwritten signature at the bottom



رائی نام / بیان صافی

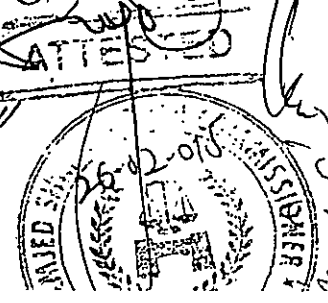
EX PA
AD 7 XII
Penna
26/2/2015

مستحقہ ڈاکٹر کبیر خان ولد عبدالروف خان ساکن دھوبی گاٹ لکھنؤ نورا کی لکھنؤ
صافی بیان کرنا ہوگا کہ من کالف نے مستحقہ جنت روانہ ولد خان خشی ساکن
گادس ضرکتو تحصیل سالارزدی ڈاکوئی نہ فار ضلع باجوڑ ایجنسی علاقہ ریسٹو 1122/11/2015
آفیسر (BPS-14) کے خلاف عدم
کو تھانہ شرقی میں FIR نمبر 52 درج کیا تھا۔ برک من کالف اور من کالف
روانہ کے درمیان کچھ غلط فہمیاں تھی۔ جو کہ گبرہ شران کے ذریعے ختم ہو گئی
ہے۔ اور گبرہ شران کے ذریعے ہم دونوں کے درمیان دانی نام ہو چکا ہے۔
لو من کالف نے مستحقہ جنت روانہ کو خفیہ سبیل اللہ کالف کو دیا ہے اگر عدالت
صفور مقدمہ مذکورہ بیان کی ضمانت قبل اور فقارہ مذکورہ کے ضمانت پر رہا
تبعی کردے تو اس پر من کالف کو کوئی اعتراض نہیں ہوگا۔

سخا دار خان ولد گبرہ شران
گبرہ شران
گبرہ شران

گبرہ شران بیان صافی / دانی نام / تحریر / روایات / نام / سند / سے

23/2/2015
17301-4536570-3



ڈاکٹر کبیر خان

(56)

Statement of Sabah-ud-Din Khattak Advocate counsel for the complainant, Peshawar on oath:

As per instruction of my client who is complainant in instant FIR No.52 dated 3/2/2015 u/s 25 Telegraph Act/ 506 PPC of P.S East Cantt, Peshawar, the petitioner was charged in the present case who is an employee of Rescue 1122. By intervention of colleagues, the matter has been patched up between the parties and he has got no objection if his pre-arrest bail of the petitioner is confirmed. To this effect I submit affidavit on behalf of the complainant which is Ex.PA. It is further clarified that this affidavit is pertaining to the confirmation of the pre-arrest bail of the petitioner. My power of attorney is Ex.PB.

Sabah-ud-Din Khattak
Sabah-ud-Din Khattak Advocate
Counsel for the complainant.

RO & AC
26.02.2015.

Phool Bibi
ASJ-XII, Peshawar

[Handwritten signature]

[Handwritten signature]
1-1

(57)

**IN THE COURT OF PHOOL BIBI,
ADDITIONAL SESSIONS JUDGE -XII, PESHAWAR**

Bakhtrawan Vs State

Case File # 71/BBA of 2015

Date of Institution: 06/02/2015

Date of Decision: 26/02/2015

(5)

ORDER


26/02/2015

1. Petitioner *Bakht Rawan* on ad-interim pre arrest bail along with Counsel and SPP for the state present. Complainant Dr. *Ayaz Khan* through counsel present.
 2. Petitioner seeks confirmation of pre arrest bail extended in his favour in case FIR No. 52 dated 28/01/2015 u/s 25-D Telegraph Act/506 PPC of Police Station East Cantt, *Peshawar*.
 3. Today *Sabah-ud-Din Khattak* advocate counsel for the complainant while submitting affidavit Ex.PA sworn by the complainant has stated ^{that} his client has instructed him that the matter had been patched up between the parties and he got no objection on confirmation of ad-interim pre-arrest bail of the petitioner. To this effect statement of counsel for the complainant recorded and placed on file. Power of attorney on behalf of the complainant in favour of his counsel is Ex.PB.
 4. The main offence u/s 506 PPC is compoundable and the complainant has
- (Signature)
- (Signature)

compounded the matter with petitioner with his own free will, which seems to be genuine and in the interest of the parties. Hence, the same is accepted.


- 5. Consequently, the ad-interim pre-arrest bail already granted to the petitioner is hereby confirmed on the existing bail bond.
- 6. Requisitioned record be returned to the quarter concern.
- 7. File be consigned to Record Room after its completion.

Announced
26/02/2015


Phool Bibi,
Additional Sessions Judge-XII,
Peshawar

No.	5629
Date of application	7/5/15
Name of applicant	Phool Bibi
Word	2402

2/5/15
2/5/15


2/5/15

11/1/15

25/2/2015



59

Nic=17301-4536570-3
03339/28713

03459005996

22UG/11 نام شور- تعداد ایک ہزار ہتر سو و 20.06.2011 لی (نام شور باہر) کی نام (پیس)

پولیس سپر سٹیشن نمبر 2

فارم نمبر 22-105

ابتدائی اطلاعی رپورٹ

فائل

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 152 مجموعہ ضابطہ فوجداری
پیس اور

16 برس سے 29 دسری اوقات

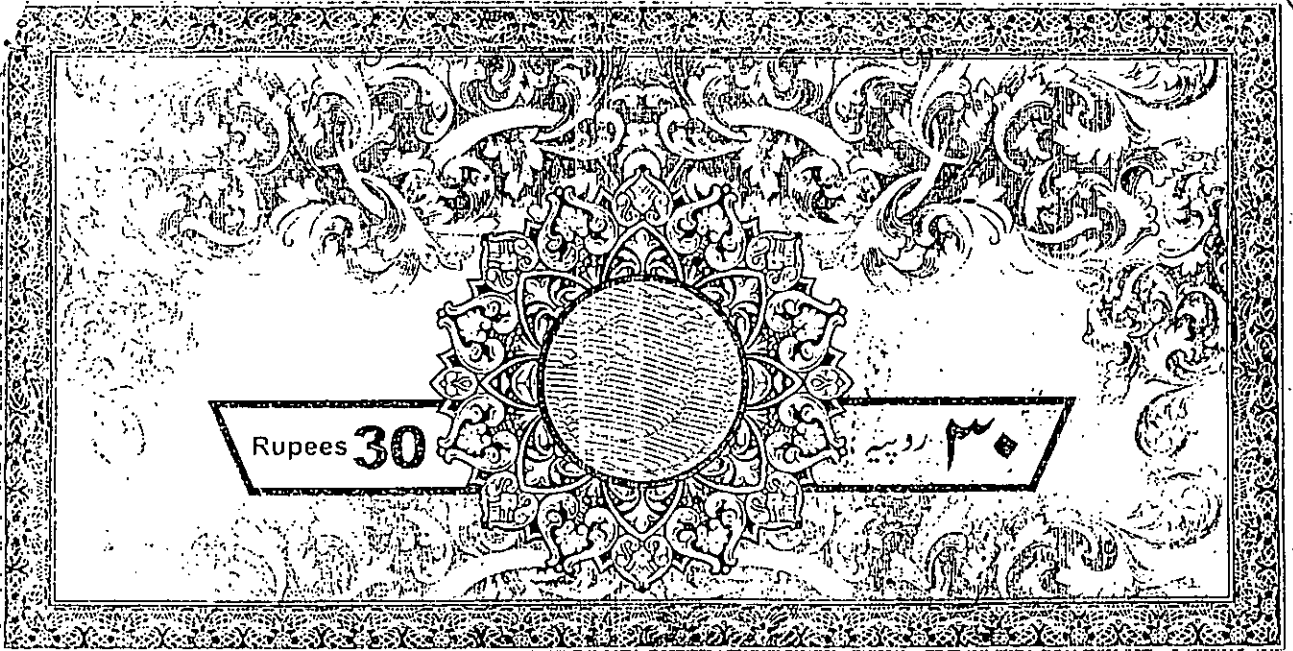
تاریخ وقت رپورٹ	15/05
نام و سکونت اطلاع دہندہ مستفیض	اللہ مرزا یار خان ڈالہ ملکہ
مختصر کیفیت جرم (موردفعہ) حال اگر کچھ لیا گیا ہو۔	25D / 1506
جائے وقوعہ فاصلہ تقاضا سے اور سمت	دستور نمبر 1122/1122
نام و سکونت ملزم	بخت خواں ولد رشید
کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہو تو وجہ بیان کرنا	لی رائے سوسپل سروسز پشاور
تقاضا سے روانگی کی تاریخ و وقت	پشاور

ابتدائی اطلاع مندرجہ درج کر کے کہ ایک شخص جو سادات اصغر ان بادی
 سجاد بھٹو کے ساتھ ہے جو پشاور پولیس سٹیشن پر صحت پر صحت دہے DPP سادات بھٹو کے
 بادی بھٹو کے ساتھ ہے اور پشاور پولیس سٹیشن پر صحت دہے اور پشاور پولیس سٹیشن پر صحت دہے
 office of the district police station Peshawar. The said person is also a Government employee of this organization
 emergency office of the district police station Peshawar. The said person is also a Government employee of this organization
 Rescue Service Rescue 1122 Peshawar to the superintendent of police
 Peshawar with reference to the subject cited above
 It is submitted that the under signed received a letter from 1122 Baktiawan through a call phone 6333
 1128713 on date 22-01-2015 when present in this office.
 The said person is also a Government employee of this organization
 i.e. Khayber Pakhtunkhwa Emergency Rescue Service Rescuer
 as station coordinator, permanent resident of Bajaur. Your good
 office is therefore requested that first information report may
 be registered against the said person under the relevant section of
 Pakistan Penal code and other relevant law if you kind cooperation
 time will highly be appreciate of metropolitan director operations
 emergency Rescue Service Rescue 1122 Khayber Pakhtunkhwa
 پشاور پولیس سٹیشن پر صحت دہے اور پشاور پولیس سٹیشن پر صحت دہے
 پشاور پولیس سٹیشن پر صحت دہے اور پشاور پولیس سٹیشن پر صحت دہے

28/2/2015 11301-4506310-3

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ذاتی نام / بیانِ علمی

مفت مسیحی ڈاکٹر گوپیاز خان ولد عبدالرزاق خان ساکن دھوبی گھاٹ لکھنؤ یونیورسٹی لکھنؤ
 صفائی بیان کرتا ہوں کہ منجانب سے مفت مسیحی بخت روان و مد خان خیر بنی ساکن
 گھاٹن ضلع کو جمع سالانہ ریزی ڈیکلاریشن فار فنلنچ باجوڑ ایجنسی ملازم ریسلینگو 1122 جوڈی
 آفیسر (BPS-14) کے خلاف عدیم 25D/506 کی تحت مورخہ 3/2/2015
 کو تھانہ شرقی میں FIR نمبر 52 درج کیا تھا۔ میرمن کالف اور ملزم بخت
 روان کے درمیان کوئی تعلق نہیں ہے۔ جو کہ گورنمنٹ شراں کے ذریعے قلم بند
 ہے۔ اور گورنمنٹ شراں کے ذریعے ہم دونوں کے درمیان ذاتی نام موجود ہے۔
 بعد میں کالف نے مفت مسیحی بخت روان کو فی سبیل اللہ کالف کو دیا ہے اگر عدالت
 حضور معلوم مذکورہ بیان کی حقیقت قبول اور گرفتاری منظور کرنے کی منت ہو رہی ہے
 تیری کردے تو میں میرمن کالف کو کوئی اعتراض نہیں ہوتا۔

مذکورہ بیانِ علمی / ذاتی نام تحریر کیا گیا ہے سہ ماہی

23/2/2015 مورخہ 17301-4536570-3

ڈاکٹر گوپیاز خان

سجاد صالح تلکیری 17301-1518550-9 مورخہ 23/2/2015

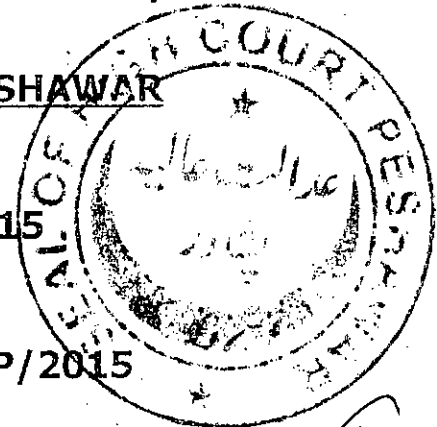
محمد زاہد کھوسو 17201-4517335-5 مورخہ 23/2/2015

Arif

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IN THE PESHAWAR HIGH COURT PESHAWAR

COC NO. 190-P/2015



IN
WRIT PETITIONS NO. 182-P, 300-P/2015

Mr. Ihsanullah & 688 others, Employees,
O/O Director General Rescue 1122, Provincial Headquarter,
Tariq Road, Khyber Pakhtunkhwa, Peshawar.

..... **Appellant**

VERSUS

- 1- Mr. Asad Ali Khan, Director General Rescue 1122, Provincial Headquarter Tariq Road, Khyber Pakhtunkhwa, Peshawar.
- 2- Mr. Mohammad Ayaz, Director Operation Rescue 1122, Provincial Headquarter Tariq Road, Khyber Pakhtunkhwa, Peshawar.
- 3- Mr. Urooj Sherazi, Administrative Officer Rescue 1122, Provincial Headquarter Tariq Road, Khyber Pakhtunkhwa, Peshawar.

..... **Respondents/Contemnors**

APPLICATION UNDER ARTICLE- 204 OF THE
CONSTITUTION OF THE ISLAMIC REPUBLIC OF
PAKISTAN, 1973 READ WITH SECTION 3 & 4 OF
THE CONTEMPT OF COURT ORDINANCE, 2004 FOR
INITIATING CONTEMPT OF COURT PROCEEDINGS
AGAINST THE RESPONDENTS/CONTEMNORS

RESPECTFULLY SHEWETH:

- 1- That the applicants/petitioners had filed writ petitions No. 182-P/2015 and 300-P/2015 in this august Court which was allowed vide Judgment dated 26.3.2015 (Annex:-A). That in the said judgment this august Court directed the respondents to finalized the new service structure for the employees of Rescue 1122 (petitioners) within a period of sixty days.
- 2- That in the said judgment this august Court directed the petitioners as per para 6 & 7 of the judgment which are reproduced as below:-

ATTESTED
EXAMINER
Peshawar High Court

19 JUN 2015

FILED TODAY
Deputy Registrar
18 APR 2015


DA
Accd.
19/6/15
22/6/15

"As for as the grievances of the petitioners regarding their harassment is concerned, as previously noted vide order dated 18.3.2015, the relevant para reads as under:- The attention of the Court was drawn to the fact that respondents are asserting undue influence over some of the petitioners to detract them from their stance taken in the present petition, The worthy AAG present in the Court is directed to put the respondents on notice that in case of pressure or influence by the respondents, in any manner, whatsoever, they shall expose themselves to penal action by the Court".

In this regard, the petitioners would be at liberty to file separate contempt of Court petition before this Court, if so advised". Copy of the order sheet dated 18.3.2015 is attached as annexure B.

- 3- That after obtaining the attested copy of the order/Judgment, applicants/petitioners submitted the said judgment before the respondents/contemnors No.1 and No.2 for implementation but the same has been ignored by the respondents but inspite honoring and obeying the said judgment of this august Court the respondents/ Contemnors issued adverse orders against the petitioners in terms of imposing major and minor punishments on the petitioners.. Copies of the orders and explanations is attached as annexure C.
- 4- That the acts and actions of the Respondents/Contemnors squarely fall within the ambit of the Contempt of the Court and as such they are liable to be proceeded for the Contempt and for the punishment under the law.

It is therefore, humbly prayed that on acceptance of this application, the Contempt of Court proceedings may graciously be initiated against the Respondents/Contemnors and they may be punished accordingly.


 EXAMINER
 Peshawar High Court
 19 JUN 2015

APPLICANTS/ PETITIONERS

IHSANULLAH & 688 OTHERS

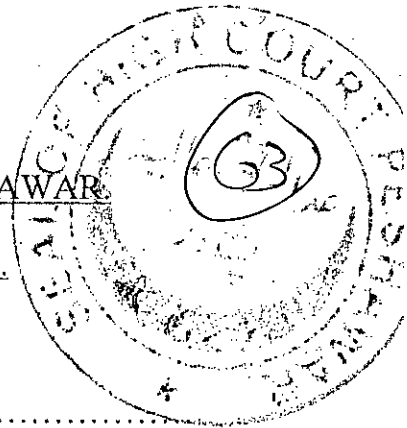
THROUGH:

NOOR MOHAMMAD KHATTAK

IHSANULLAH
 688 OTHERS
 PESHAWAR

[Handwritten signature]

JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT, PESHAWAR
JUDICIAL DEPARTMENT
COC No: 190-P/2015 in W.P NO-182-P/2015.



JUDGMENT

Date of hearing.....16.06.2015.....

Petitioner (s) *(Ihsanullah)* by *Mr. Mary Muhammad Khattak A.*

Respondent (s) *(Asad Ali Khan)* by *Mr. Muhammad Riaz Pindochhel*
Mr Sabahuddin Khattak, Advocate

YAHYA AFRIDI :-J:

Through the instant

petition, Ihsanullah and others, have sought the contempt proceedings against the respondents for non-compliance of orders of this Court dated 26.03.2015, passed in W.P No. 182-P/2015 and W.P No.300-P/2015.

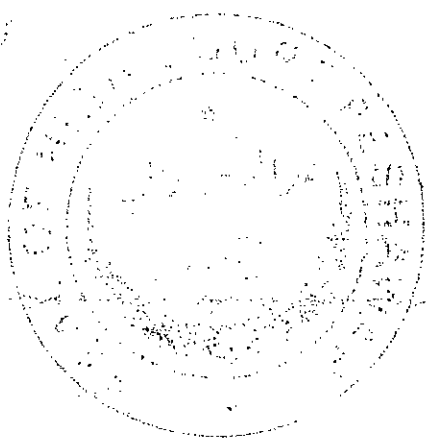
2. The respondents were put to notice. Today, Mr. Sabahuddin Khattak, Advocate, representing the respondents, produced detailed report, which is Exh. PHC/1 (consisting of 09 sheets) regarding disciplinary action taken against the petitioners since January, 2015 to 15th June, 2015, and stated at the bar that the orders of this Court has been complied with.

9

~~ATTENDED~~
EXAMINER
Peshawar High Court
16.06.2015

C

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3. Keeping in view the above, no contempt has been made out. Hence, the contempt petition is dismissed and notices issued to the respondents are hereby recalled. However, if the petitioners are still aggrieved, they may seek appropriate remedy before the proper forum.

Announced:
Dated. 16.6.2015.

sd/Yahya A. Joddi
sd/Rooh-ul-Amin Khan

JUDGE

CERTIFIED TO BE TRUE COPY
Examiner
Peshawar High Court, Peshawar
Authorised Under Article 87 of
The Qanun-e-Shenedad Order 1984
19 JUN 2015

24928

No.

Date of Presentation of Application 19/6/15

No of Pages 04-P

Copying fee /

Urgent Fee

Total 08.00

Date of Preparation of Copy 19/6/15

Date Given for Delivery 19/6/15

Date of Delivery of Copy 19/6/15

Examined By: *[Signature]*

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INQUIRY REPORT

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INTRODUCTION

In compliance of office order No.2-12/suspension/DG-1122/Estt:/176-80 Peshawar: 12-01-2015, the undersigned conducted an impartial fact finding inquiry after thorough analysis of statement of allegations in case of Mr. Bakhth Rawan (Station Coordinator-66) Peshawar, suspended due to the alleged dereliction in official duties.

FINDINGS

1. First allegation against Mr. **Bakhth Rawan** (Station Coordinator) was an explanation issued on dated 12-08-2011 due to his absence from duty, however according to his personal file; the Competent Authority had accepted his explanation reply because of illness.
2. Second allegation against the said official was issued from District Emergency Office on 07-01-2015 due to submitting blank Rota as an incharge of station-66, Peshawar. In this regard the date in statement of allegation was wrong may be due to clerical mistake and the official responded according to the same date as mentioned in the allegations statement that I have not submitted blank Rota on 07-01-2014. However the said official was contacted through phone and informed that the clerical mistake has been removed but the said official did not cooperate in this regard.
3. Third allegation against the said official was a surprise visit report of station-66 (in which the said official was incharge) of Director operations/DEO on 01-01-2015 in which the DEO Peshawar declared him an irresponsible, careless and disobedient official because of his poor administration, poor discipline and pathetic conditions of vehicles etc. In this regard the said official did not respond and clearly denied/rejected that no surprise visit was paid by Director Operations/DEO Peshawar on the above mentioned date and have no signature on the visiting Register. Furthermore the said official stated that his management and maintenance of vehicles are up to the mark. To remove the confusion over this point the undersigned personally visited the said station and interviewed several rescuers and it was confirmed by one of their station rescuer (on the condition of keeping his name secret) that visit has been paid by Director Operations/DEO Peshawar on the mentioned date and further said that dust on vehicles were there due to its station location i.e. dust all around the station due to construction of KTH hospital building but the register maintenance was up to the mark at the said date.
4. Another allegation against the said official was about malpractices i.e. receiving cash from the rescuers by recommending their leaves or adjusting duty Rote in their Favor. However the undersigned interviewed several rescuers in this regard but no solid proof was available although rumors were there.
5. Last allegation in which the said official issued threats and used abusive language against Director Operations/DEO through a phone call. In this regard the said official denied any such call. However Director Administration is the witness and endorsed it.

Conclusions

1. The undersigned considers that submitting blank Rota is clearly reflecting inefficiency and carelessness on the part of the said official.
2. The undersigned considers that the said official has maintained poor discipline and maintenance of vehicles were also not up to the mark, Moreover his attitude towards seniors is also not satisfactory.
3. The undersigned considered that the said official behavior i.e. issuing threats and using abusive language towards seniors must not be tolerated at any cost.

RECOMMEDATIONS

The undersigned recommended that action may be taken against the said official according to the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) rules, 2011 on the basis of above findings and conclusions, which may cultivate in dismissal from the services.

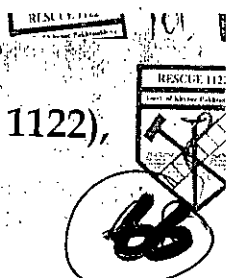
INQUIRY OFFICER



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),

GOVERNMENT OF KHYBER PAKHTUNKHWA

info@rescue1122kpk.com www.rescue1122kpk.com



DIRECTOR GENERAL

No.1-2/Discipline/DG-1122/Estt: 792-97 Peshawar: 19 - 02-2015


To

Mr. Bakhtwan
Station Coordinator,
ERS (Rescue-1122) Peshawar.

Subject: SHOW CAUSE NOTICE.

I am directed to send the enclosed show cause notice to be responded within (07) days of issuance of this letter.

This show cause notice issued as per E & D Rules for your final written explanation for personal hearing before competent authority:


Admin Officer

Emergency Rescue Service (Rescue-1122)
Khyber Pakhtunkhwa

Copy to:-

1. District Emergency Officer, ERS (Rescue-1122), Peshawar.
2. PA to Director General, ERS (Rescue-1122), Khyber Pakhtunkhwa.
3. Personal file of the concerned.
4. Office File.


Admin Officer

Emergency Rescue Service (Rescue-1122)
Khyber Pakhtunkhwa







DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),

GOVERNMENT OF KHYBER PAKHTUNKHWA

info@rescue1122kpk.com www.rescue1122kpk.com



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DIRECTOR GENERAL

No.1-2/Discipline/DG-1122/Estt: 7972/Peshawar: 19 - 01-2015

SHOW CAUSE NOTICE:

I Dr. Asad Ali Khan Director General, Khyber Pakhtunkhwa Emergency Rescue Service (Rescue-1122) as competent authority under the E & D Rules do hereby serve you Mr. Bakhtwan (Station Coordinator) Khyber Pakhtunkhwa Emergency Rescue Service (Rescue-1122) Peshawar as follows;

1. Explanation on dated 23-08-2011 was issued due to being absent from duty on dated 12-08-2011.
2. Explanation issued by Director Operations on dated 07-01-2014 due to submitting the blank roaster of 12 hours shift.
3. Suspension order on dated 12-01-2014 was issued with nomination of Inquiry Officer.
4. Explanation issued on dated 20-01-2015 being absent during the visit of the Director Operation on dated 20-01-2015.
5. First Information Report (FIR) through letter No.4/DEO-Pesh/Gen/00-0 dated 28-01-2015 registered against you for abusing and threatening the Director Operations on mobile phone.
6. During the visit of Director Operations on dated 01-01-2015 following were noticed with great concern:
 - i. Very poor standard of cleanliness observed at the station.
 - ii. Register, logbook and especially vehicle maintenance was not satisfactory.
 - iii. A very disappointing aspect was the poor condition of the personal hygiene of the Rescuer.
 - iv. Appearance of uniform of Rescuers was pitiful which clearly shows poor management and ill-discipline on part of the Station Coordinator.
 - v. Furthermore Mr. Bakhtwan Station Coordinator is disobedient and irresponsible official it is proposed that strict disciplinary action may be initiated against him.
7. Inquiry Officer nominated on dated 12-01-2014 fixed the responsibility and recommended strict action (Major Penalty) according to efficiency and disciplinary Rules, 2011.

(Next Page Continue)



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
GOVERNMENT OF KHYBER PAKHTUNKHWA
info@rescue1122kpk.com www.rescue1122kpk.com



DIRECTOR GENERAL

No.1-2/Discipline/DG-1122/Estt: 797-9 Peshawar: 19 - 02-2015

8. You are therefore required to show cause as to why the penalty should not be imposed upon you and also intimate if you desire to be heard in person.
9. If no reply to this notice is received within **Seven (07) days** of its delivery in normal course of circumstance then it shall be presumed that you have no defence to put up before and in that case, *ex parte* action shall be taken against you.

Had
DIRECTOR GENERAL

9/
Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa,

lu



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RESCUE 1122

DIRECTORATE GENERAL OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
GOVERNMENT OF KHYBER PAKHTUNKHWA

No.2-8/Summon/DG-1122/Estt: 1418-22

Peshawar: 20-03-2014

To

Mr. Bakht Rawan,
Station Coordinator,
ERS (Rescue-1122) Peshawar

Subject: SUMMON/PERSONAL HEARING.

In reference to your reply of Show Cause Notice on dated 26-02-2015, You are hereby directed to ensure your presence before the competent authority on Tuesday dated 24-03-2015 in Khyber Pakhtunkhwa Emergency Rescue Service (Rescue-1122) Head Quarter at 10:30 am sharp in light of E & D Rules for personal hearing.

Admin Officer

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa, Peshawar.

Copy to:-

1. Director Admin, ERS (Rescue-1122) Khyber Pakhtunkhwa.
2. Director Operations, ERS (Rescue-1122) Khyber Pakhtunkhwa.
3. PA to Director General, ERS (Rescue-1122) Khyber Pakhtunkhwa.
4. Personal File.

Admin Officer

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa, Peshawar.

24/3/15
Received.
[Signature]



OFFICE OF THE DISTRICT EMERGENCY OFFICER
Khyber Pakhtunkhwa Emergency Rescue Service
(Rescue - 1122), Peshawar



No.2/Discipline/DEO-Pesh/49-46

Peshawar: 14-01-2015


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To

Mr. Bakhtrawan- Station Coordinator
Peshawar.

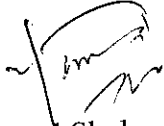
Subject: SUMMON.

You are hereby summoned to appear on 16-01-2015 at 09:00 am sharp regarding the inquiry before the office of the undersigned at head office Peshawar.


Kamal Shah
Emergency Officer
Emergency Rescue Service (Rescue 1122),
Peshawar.

Copy to:-

1. District Emergency Officer, ERS (Rescue 1122), Peshawar.
2. Admin Officer, ERS (Rescue 1122), Peshawar
3. Personal file of the concerned.
4. Office file.


Kamal Shah
Emergency Officer
Emergency Rescue Service (Rescue 1122),
Peshawar.



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),

GOVERNMENT OF KHYBER PAKHTUNKHWA

info@rescue1122kpk.com www.rescue1122kpk.com



No.1-1/Office Order/DG-1122/Estt: 1537-4/Peshawar: 8-4-2015

OFFICE ORDER

Consequent upon the approval of the competent authority, the recommendations of the inquiry officer and after holding personal hearing to the official and fulfilling all codal formalities under the (Efficiency & Discipline) Rules 2011, the competent authority has further agreed to the findings of inquiry officer and decided to impose the major penalty by dismissing Mr. Bakht Rawan S/O Khan Pachai Station Coordinator (BPS-14) Khyber Pakhtunkhwa Emergency Rescue Service (Rescue-1122) Peshawar holding of CNIC Number 21106-1911823-7 resident of village Kharkano P.C. Khar Tehsil Salarzai District Bajaur Agency Khyber Pakhtunkhwa with immediate effect.

(ADMIN OFFICER)

Emergency Rescue Service (Rescue 1122),
Khyber Pakhtunkhwa

Copy to:-

1. Accountant General, Khyber Pakhtunkhwa.
2. District Emergency Officer, Emergency Rescue Service (Rescue-1122), Peshawar.
3. PS to Secretary Relief Rehabilitation & Settlement Department, Govt. of Khyber Pakhtunkhwa.
4. Accountant, Emergency Rescue Service (Rescue-1122), Peshawar.
5. PA to Director General, ERS (Rescue-1122) Khyber Pakhtunkhwa.
6. Senior Store Keeper, ERS (Rescue-1122) Head Quarter.
7. Mr. Bakht Rawan Ex- Station Coordinator ERS (Rescue-1122) Station-66 Peshawar.
8. Office file.

(ADMIN OFFICER)

Emergency Rescue Service (Rescue 1122)
Khyber Pakhtunkhwa

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL NO. 819/2015

BAKHT RAWAN

VS

GOVT: OF KPK

REJOINDER ON BEHALF OF PETITIONER IN
RESPONSE TO THE REPLY SUBMITTED BY THE
RESPONDENTS

R/SHEWETH:

PRELIMINARY OBJECTIONS:

(1-6):

All the preliminary objections raised by the respondents are incorrect and baseless and not in accordance with law and rules rather the respondents are estopped due to their own conduct to raise any objection at this stage of the appeal.

ON FACTS:

- 1- Admitted correct by the respondents hence no comments.
- 2- Incorrect and not replied accordingly. That the appellant due to his commitment to his job description and hard work was assigned the extra charge of Station House Incharge (BPS-16) for quite sufficient period of more than 3 years but the respondents due unaware of the fact counted the said same as few months.
- 3- Incorrect and not replied accordingly. That the appellant was issued statement of allegation with out charge sheet in which plethora of baseless allegations were leveled against the appellant including (i) having one day absence way back in 2011, (ii) Explanation issued by District Emergency Officer, Peshawar on dated 7.1.2014 due to submitting the blank duty Rota of station 66, Peshawar, (iii) as per visit report of station No.6 Peshawar on dated 1.1.2015 by the District Emergency Officer Peshawar. That in response to the said statement of allegation the appellant submitted his detailed reply and denied all the allegations with documentary proof. That during the entire service career the appellant has efficiently served the respondent Department and as such no complaint whatsoever have been lodged against the appellant.
- 4- Admitted correct hence need no comments.