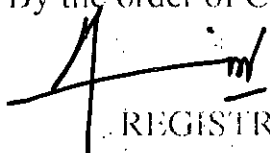


FORM OF ORDER SHEET

Court of _____

Appeal No. 2545/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/12/2023	<p>The appeal of Mr. Ikram Ullah resubmitted today by Mr. Javed Ahmad Kakar Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ . Parcha Peshi is given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Ikram Ullah received today i.e on 05.12.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of appellant is incomplete which may be completed according to the rule-6 of Khyber Pakhtunkhwa Service Tribunal rules-1974.
- 2- Memorandum of appeal is not signed by the appellant.
- 3- Annexures of the appeal are not in sequence be annexed serial wise as mentioned in the memo of appeal.
- 4- Page Nos. 23, 24, 25, 28, 29 and 35 of the appeal are illegible which may be replaced by legible/better one.

No. 3791 /S.T.

Dt. 6/12 /2023.

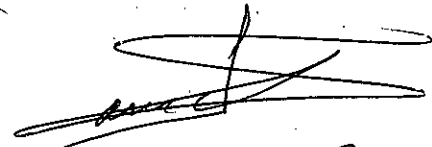


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Javed Ahmad Kakar Adv.
High Court Peshawar.

note:

That the objection raised upon the appeal are removed and cleared. Now the file is ready for re-submission.



Counsel
Javed Ahmad Kakar

(A)

BEFORE THE HON'BLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

In Re S.A 2545 /2023

Ikram Ullah

VERSUS

Govt of Khyber Pakhtunkhwa & other

INDEX

S#	Description of Documents	Annex	Pages
1.	Grounds of Appeal.		1-5
2.	Affidavit.		6
3.	Copy of Condonation application		7-8
4	Affidavit		9
5	Addresses of parties		10
6	Copy Doctor Prescriptions	"A"-A6	11-17
7	Copy of Death Certificate	"B"	18
8	Copies of medical reports	"C"-C2	19-20
9	Copy of dismissal order	"D"	21
10	Copies of the Show Cause Notice and statement of allegations.	"E-F"	22-23
11	Copies of Letters, Enquiry and orders	"G, H, I"	26-31
12	Other documents		32-38
13	Wakalat Nama		39

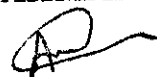
Appellant

Dated 29/11/2023

Through


JAVED AHMAD KAKAR

&


ARSHAD AMAN GANDAPUR
Advocates High Court
Peshawar

(1)

BEFORE THE HON'BLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 9694

Dated 05-12-2023

In Re S.A _____/2023

Ikram Ullah S/o Niamat Ullah R/o Mohallah Jogi Khel,
Sangao, Tehsil and District Mardan. (Police constable
Belt No FC-2786 District Police Mardan)
.....Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa Through Capital City Police Officer (C.C.P.O) Peshawar
2. Inspector General of Police Khyber Pakhtunkhwa.
3. Regional Police Officer Mardan.
4. District Police Officer Mardan.

.....Respondents

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT -1974 AGAINST THE
IMPUGNED DISMISSAL ORDER NO. OB 243 DATED
30/01/2023 WHEREBY THE APPELLANT WAS
DISMISSED FROM SERVICE AND AGAINST THE
IMPUGNED ORDER NO. 6002/ES DATED 12/09/2023,
WHEREBY THE REVISION PETITION DISMISSED
ON DATED 06/10/2023 IN A CLASSICALLY
CURSORY AND WHIMSICAL MANNER.

RESPECTFULLY SHEWETH:

1. That the appellant was initially appointed in police department as constable, after observing all the codal formalities in the form of tests & interviews & was thus given belt No. FC. 2786 in 2009.

(2)

2. That after being inducted into service, the appellant has been the most obedient, hardworking & sincere subordinate & never left any stone unturned in fulfillment of his duties & responsibilities.

3. That on 14-05-2022 the appellant while performing his official duty, was informed that his mother is seriously ill. The appellant got permission from the concern police station and took her mother to the hospital where she was diagnosed of serious illness i.e. (Anemia, Arthritis).

(Doctor Prescriptions are attached as annexure A)

4. That on dated 24-02-2023 the mother of the appellant passed away from the same illness.

(Copy of Death Certificate is attached as annexure B)

5. That after the demises of the mother the appellant was suffered from affective disorder and fell in depression and was confined to bed due to which the appellant was under the care and treatment of doctor for a long period.

(Copies of medical reports are attached as annexure C)

6. That the appellant on dated 14-05-2022 got permission for leave from the concern police station but to utter shock of the appellant when he came to know through the inquiry report dated 31-01-2023 that he is absent from his duty without permission from 14-05-2022 contrary to the facts.

(Copy of dismissal order is attached as annexure D)

7. That because of the absence, which was certainly beyond the control of the appellant, the appellant was repeatedly issued show cause Notices along with statements of allegations which was replied in quite detail and true scenario, was detailed therein.

(Copies of the Show Cause Notice and statement of allegations are annexed herewith as annexure "E, F").

8. That different applications were submitted by the appellant to the high ups from time to time but no fruitful result came out. The appellant submitted applications to DIG Mardan with reference to Letter No. 6002, dated 12-09-2022 and DPO Mardan with reference to Letter No. OB No. 243 dated 30-01-2023 and enquiry conducted by the respondent No.5.

(Copies of Letters, Enquiry and orders are attached as Annexure G, H, I)

9. That the appellant preferred a departmental appeal quite well in time, but instead of re-instating the appellant the respondent dismissed his appeal.

10. That on dated 21-09-2023 the appellant approached to IG of Khyber Pakhtunkhwa and submitted revisional application which was turned down on dated 06-10-2023.

11. That the appellant feel aggrieved from the respondents order to approaches this honorable tribunal on the following grounds inter-alia.

GROUND:-

1. That the impugned dismissal order as well as the revisional and appellant orders are against facts of the case & law governing the subject & liable to be set aside.

2. That the impugned dismissal order as well as that of the appellate authority are cubical, void ab-initio, & unwarranted & are liable for setting aside.

(4)

3. That no proper inquiry was ever conducted in case of the appellant, nor the appellant was ever heard in person, nor was ever allowed to cross examine any witness and thus the appellant was condemned unheard.
4. That the allegation of absence from the duties of the appellant was not based on true facts, but rather has been victimized for reasons best known to the respondents.
5. That the appellant was ill and remained confined to bed for a long period and thus could not report to the department and on the other hand the department took the same as deliberate absence from duty and was proceeded against departmentally.
6. That even the appeal of the appellant was simply shelved without any rem or reason, nor the appellant was ever summoned and thus the appellant was double jeopardized.
7. That the appellant belongs to a poor family, and is the only earning hand in the whole family to look after them.
8. That the appellant has 11 year service and that too unblemished, without any complaint ever against, on part of the appellant.
9. That from every angle the appellant is liable to be reinstated into service into with all back benefits.
10. That from all prospective the dismissal order as well as that of the appellate and revisional orders are illegal, wrong, unwarranted & are liable to be set aside.

(5)

11. That any other ground not raised here may graciously be allowed at the time of arguments.

It is, therefore, humbly prayed that on acceptance of the instant appeal, the impugned office order No. 2488 dated 06-10-2023 of the Respondent No.2 as well as impugned office order No.6002/ES dated 12-09-2023 of respondent No.3 and order No. OB 243 dated 30/01/2023, whereby the applicant has been dismissed from Service may graciously be set-aside and by doing so the appellant may very graciously be re-instated into Service with all back benefits.

Any other relief not specifically asked for may also graciously be extended in favour of the appellant in the circumstances of the case.


Appellant

Dated 29/11/2023

Through


JAVED AHMAD KAKAR

&


ARSHAD AMAN GANDAPUR
Advocates High Court
Peshawar

Note:

No such like appeal for the same appellant has earlier been filed by me, upon the subject matter, prior to the instant one.


ADVOCATE.

List of Books Referred:

1. Constitution of the Islamic Republic of Pakistan
2. Case Laws
3. Any other book as per need.


ADVOCATE

(6)

BEFORE THE HON'BLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Ikram Ullah

VERSUS

Govt of Khyber Pakhtunkhwa

AFFIDAVIT

I, Ikram Ullah S/o Niamat Ullah R/o Mohallah Jogi Khel, Sangao, Tehsil and District Mardan, do hereby solemnly affirm and declare on oath that all the contents of the Instant Appeal are true and correct to the best my knowledge and belief and nothing has been concealed from this honorable Court.

I. Ullah

DEPONENT

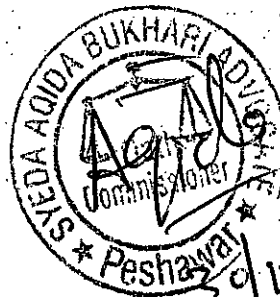
CNIC: 16101-5773868-1

Mob: 0300-9345448

Identified by:

[Signature]
Advocate

ATTESTED



(7)

**BEFORE THE HON'BLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR**

In Re. C.M No. _____/2023

In S.A No. _____/2023

Ikram Ullah

VERSUS

Govt of Khyber Pakhtunkhwa & Others

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth,

1. That the petitioner is filing the accompanying appeal the contents of which may graciously be considered as integral part of the instant petition.
2. That the petitioner had preferred departmental period within one month from the impugned dismissal order, but when the appeal was preferred, the appellant was suffering from affective disorder and fell in depression and was confined to bed.
3. That delay in approaching this Tribunal was due to perusing the aforementioned reason which was neither intentional, nor was under control of the petitioner.
4. That law also favour adjudication on merits and technicalities of any sort must always be ignored while reaching a just and fair disposal of any les.

(8)

5. That for proper disposal of the accompanying case on its merits, the condonation of delay is indispensable.
6. That not only the petitioner has got a prima facie case and having balance of convenience in his favour, but would suffer irreparable loss, if the instant petition is not allowed.

It is, therefore, most humbly prayed that on acceptance of the instant petition, the delay in filing the accompanying appeal i.e. almost 27 days, may graciously be condoned and the accompanying appeal may very graciously be decided on its merits.

Petitioner/Appellant

Dated 29/11/2023

Through


JAVED AHMAD KAKAR

&


ARSHAD AMAN GANDAPUR

Advocates High Court

Peshawar

(9)

**BEFORE THE HON'BLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR**

Ikram Ullah

VERSUS

Govt of Khyber Pakhtunkhwa

AFFIDAVIT

I, Ikram Ullah S/o Niamat Ullah R/o Mohallah Jogi Khel, Sangao, Tehsil and District Mardan, do hereby solemnly affirm and declare on oath that all the contents of the Instant Application are true and correct to the best my knowledge and belief and nothing has been concealed from this honorable Court.

Ikram Ullah

DEPONENT

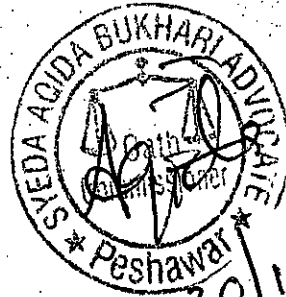
CNIC: 16101-5773868-1

Mob: 0300-9345448

Identified by:

[Signature]
Advocate

ATTESTED



30/11/23

(10)

**BEFORE THE HON'BLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR**

Ikram Ullah

VERSUS

Govt of Khyber Pakhtunkhwa & Others

ADDRESS OF PETITIONERS

Ikram Ullah S/o Niamat Ullah R/o Mohallah Jogi Khel,
Sangao, Tehsil and District Mardan.

ADDRESS OF RESPONDENTS

1. Government of Khyber Pakhtunkhwa Through Capital
City Police Officer (C.C.P.O) Peshawar
2. Inspector General of Police Khyber Pakhtunkhwa.
3. Regional Police Officer Mardan.
4. District Police Officer Mardan.

Appellant

Dated 29/11/2023

Through


JAVED AHMAD KAKAR

&

ARSHAD AMAN GANDAPUR

Advocates High Court

Peshawar



AM&DC ABUZAR MEDICAL & DIAGNOSTIC CENTRE

Abuzar Pharmacy, Opp. CMT & SD Golra Mor, Islamabad.
☎ 0342-8286668 ☎ 051-5495920
www.abuzar.telehospital.health



Name M/O Ikram ulldh MR# _____
Gender F/M Age 68 yrs Date 11-12-2022

BP 180/100 mmHg
TEMP 100 ° F
PULSE _____
SPO2 _____
R.R. _____
WEIGHT _____

1/0 - Fever
Cough
SOB } 03 days

O/E
A+, J+, P.E+
chest: HV B
CV S: S1 + S2 + 0

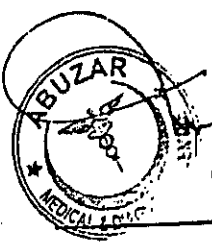
T2: Janix 40mg stat
J: Oxidol 1gm 2x stat
Nebs E atent clarit 1RS stat

Ad
Blood CP
CRP
ECG
Echo

S, B

TAB: O-EZIDAY 1x OD
TAB: RAS9 10mg 1x HS
CAP: A20MAX 500mg 1x OD
TAB: P/L 2x2+2
TAB: FEAB7-D 1x OD

1x OD
1x HS
1x OD
05 days



Dr. Ahmed

Not valid For Court

- Medical specialist
- Medical officer
- Urologist
- Gynecologist
- Physiotherapy
- ENT specialist
- Home care services
- Laboratory
- Pharmacy

Professor
Brig. M. Suhail Amin

MRCSEd (UK), FCPS (Surg), FCPS (Orth), MCPS (HPE),
Fellowship in Adult Joint Reconstruction (Singapore),
Fellowship in Sports Surgery (Singapore), AO Fellowship (AO)

Consultant Orthopaedic Surgeon
Specialist in Joint Replacement / Reconstruction,
Arthroscopic / Sports Injury Surgery
Bone & Joint Tumor Surgery

Member American Academy of Orthopaedic Surgeons (AAOS), USA
Associate Member Singapore Orthopaedic Association (SOA), Singapore
Member AO Trauma, Switzerland

Appt: 0323-3114855

30-11-2022

M/Dr Ikram Ullah

پروفیسر
بریگیڈیئر محمد سہیل امین
ایف سی پی ایس (سرجری)، ایف سی پی ایس (آرٹھو)، ایم سی پی ایس (ایچ پی ایس)،
فرینڈشپ فیلو شپ آف ایڈلٹ جوائنٹ ری کنسٹرکشن (سنگاپور)،
فرینڈشپ فیلو شپ آف سپورٹس سرجری (سنگاپور)، او ایف ایچ (او ایف ایچ)،
ایف او ایف ایچ (ایف او ایف ایچ)،
ایف او ایف ایچ (ایف او ایف ایچ)،
ایف او ایف ایچ (ایف او ایف ایچ)،
ایف او ایف ایچ (ایف او ایف ایچ)

Original
X-ray Both knee joints
AP (Standing)
Lax
Hydric
wax

Professor
Brig. M. Suhail Amin
MRCSEd (UK), FCPS (Surg), FCPS (Orth), MCPS (HPE)
Classified Orthopaedic Surgeon
CMH, Rawalpindi

Professor

Brig. M. Suhail Amin

MRCSEd (UK), FCPS (Surg), FCPS (Orth), MCPS (NPE),
Fellowship in Adult Joint Recon (Singapore),
Fellowship in Sports Surgery (Singapore), AO Fellowship (UK)

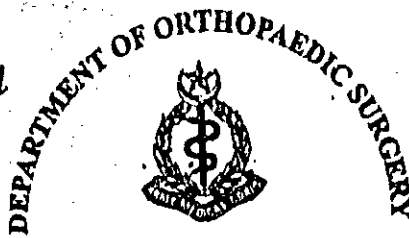
Consultant Orthopaedic Surgeon

Specialist in Joint Replacement / Reconstruction,
Arthroscopic / Sports Injury Surgery
Bone & Joint Tumor Surgery

Member American Academy of Orthopaedic Surgeons (AAOS), USA
Associate Member Singapore Orthopaedic Association (SOA), Singapore
Member AO Trauma, Switzerland

Appt: 0323-3114855

13



Combined Military Hospital Rawalpindi
& Army Medical College Rawalpindi

Anneau Ar

پروفیسر بریگیڈیئر محمد سہیل امین

ایم ای ایم سی (اینگلینڈ)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)
ایم ای ایم سی (اینگلینڈ)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)

ایم ای ایم سی (اینگلینڈ)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)

ایم ای ایم سی (اینگلینڈ)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)

ایم ای ایم سی (اینگلینڈ)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)

ایم ای ایم سی (اینگلینڈ)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)

ایم ای ایم سی (اینگلینڈ)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)

ایم ای ایم سی (اینگلینڈ)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)، ایم ای ایم سی (سنگاپور)

Name: M/O Ikram Ullah Age 58yrs Date 30-11-2022

Advanced
OA
knee.

(A/E) +
knee/spine

FPO - RT 10°
L 10°
OA°
HTN°
-



- ⊙ TAB NECULIS (100%)
سینکھنے والی جگہ (کمان) 100%
- ⊙ TAB MYONAL
سینکھنے والی جگہ (کمان) 100%
- ⊙ TAB OSWALD-1
سینکھنے والی جگہ (کمان) 100%
- ⊙ CAP ESOSTA (20%)
سینکھنے والی جگہ (کمان) 20%
- ⊙ CAP DULOCOFF (30%)
سینکھنے والی جگہ (کمان) 30%

2 weeks

Professor
Brig. M. Suhail Amin
MRCSEd (UK), FCPS (Surg), FCPS (Orth), MCPS (NPE)
Orthopaedic Surgeon

غوثیہ میڈیکل سنٹر میٹرنٹی ہوم

آفسیہ آباد، راولپنڈی۔ فون 051-5494478

Dr. Rizwana Abrar
M.B.B.S., F.C.P.S., M.C.P.S
Gynaecologist

صبح 10:00-1:00 بجے دن
شام 6:00-9:00 بجے رات
نمبر پروڈاکٹوار

لیڈی ڈاکٹر رضوانہ ابرار
ایس ایم ایس ایف سی پی ایس ایم ایس ایف سی پی ایس

Patient's Name M/O Ikrom ullah Age 68 yrs Sex F Date 16-9-2022

Clinical Notes

Rx

(130
/
Sz)

Temp 99.3°f

Adv
RFI, CBC

Tan Detrusited x22

Detrusited N 2

(14) ←

ایکسرے، لیبارٹری، الٹراساؤنڈ، ڈیویزی اور ہر قسم کے آپریشن کی سہولت موجود ہے۔

Col
DR. AMER FAKHR
MBBS (QAU)
DIP MED (AFPGMI)
FCPS MED (PAK)
OJT RHEUMATOLOGY (LONDON)

ایم ایچ راولپنڈی
ریومنالوجی ڈیپارٹمنٹ



ڈاکٹر عامر فخر

ایم بی بی ایس (کیو اے یو)
ڈپ میڈیسن (اے ایف پی بی ایم آئی)، ایف سی پی ایس (پاک)
ہیڈ آف ڈیپارٹمنٹ ریومنالوجی
ممبر نیشنل ریومنالوجی آرٹھرائٹس سوسائٹی (لندن)
ممبر برٹش سوسائٹی آف ریومنالوجی (لندن)
ایسوسی ایٹ پروفیسر آف میڈیسن
کامیونٹی میڈیکل اسپیشلسٹ اور ریومنالوجسٹ
ایم ایچ راولپنڈی کینٹ

Head of Rheumatology Department
Specialist in Joint Diseases & Autoimmune Diseases
Associate Professor of Medicine
Member National Rheumatoid Arthritis Society (London)
Member British Society of Rheumatology (London)
Classified Medical Specialist & Rheumatologist
Military Hospital, Rawalpindi Cantt.
Ph (PA): 0345-4653887

Patient's Name: M/lo Iqbal Ullah
Age: 68 yrs Date: 29/8/2022 Weight: _____ BP: 120/80

CA
Spinal
Radicular
Obese
Joint
Glandular
Comfolora
LACOLER
AMODIP-Plus
JLEVAL
Glandular
= 1/2 105
= 1 150
= 1 100
= 1 100
= 1 100
= 1 100

Follow Up

[Signature]

Col
DR. AMER FAKHR

MBBS (QAU)
DIP MED (AFPGM)
FCPS MED (PAK)
OJT RHEUMATOLOGY (LONDON)

Head of Rheumatology Department
Specialist in Joint Diseases & Autoimmune Diseases
Associate Professor of Medicine
Member National Rheumatoid Arthritis Society (London)
Member British Society of Rheumatology (London)
Classified Medical Specialist & Rheumatologist
Military Hospital, Rawalpindi Cantt.
Ph (PA): 0345-4653887

ایم ایچ راولپنڈی

16

ریو میٹالوجی ڈیپارٹمنٹ



Annexus AS

ڈاکٹر عامر فخر

یو بی ایس (کیو ایس یو)

ڈپ میڈیسن (ایف بی جی ایم اے سی)، ایف سی پی ایس (پاک)

ہیڈ آف ایپارٹمنٹ ریو میٹالوجی

ممبر نیشنل ریو میٹائڈ آرٹھریٹس سوسائٹی (لندن)

ممبر برٹش سوسائٹی آف ریو میٹالوجی (لندن)

ایسوسی ایٹ پروفیسر آف میڈیسن

کلاسفائیڈ میڈیکل اسپیشلسٹ، ریو میٹالوجسٹ

ایم ایچ راولپنڈی کینٹ

Patient's Name: M/O Ikram Ullah
Age: 68 yrs Date: 2/8/2022 Weight: _____ BP: 140/90

Spinel
Levodopa
+
OA
Obese lady
Exacerbated
const. ?
Diabetes
Rs 200/mf
AMC
AMER FAKHR
Classified Medical Specialist
Head Dept of Rheumatology
MH Rawalpindi
Chlorzoxipone
5007
Intra-articular (b/w) knees Follow Up
ē (Amalgam, Bupivacaine & Triton)
Rs 700/-

Col
DR. AMER FAKHR

MBBS (QAU)
DIP MED (AFPGM)
FRCS MED (PAK)
OJT RHEUMATOLOGY (LONDON)

Head of Rheumatology Department
Specialist in Joint Diseases & Autoimmune Diseases
Associate Professor of Medicine
Member National Rheumatoid Arthritis Society (London)
Member British Society of Rheumatology (London)
Classified Medical Specialist & Rheumatologist
Military Hospital, Rawalpindi Cantt.
Ph (PA): 0345-4653887

(17)
ایم ایچ راولپنڈی
ریومنالوجی ڈیپارٹمنٹ

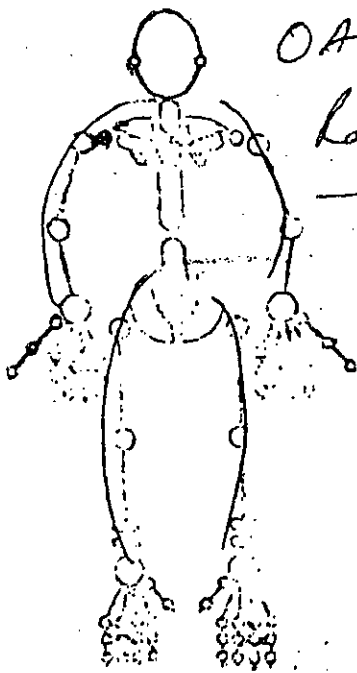


Annexure A 6

ڈاکٹر عامر فخر

(کیو ایس ایو)
ن (ایس ایف پی جی ایم آئی)، ایف سی پی ایس (پاک)
پارٹنٹ ریومنالوجی
سائنڈ آرٹھرائٹس سوسائٹی (لندن)
سائی آف ریومنالوجی (لندن)
پروفیسر آف میڈیسن
پڈیکل اسپیشلسٹ، ریومنالوجسٹ
ولپنڈی کینٹ

Patient's Name: M/O Krom Ullah
Age: 68 Yrs Date: 22/6/22 Weight: _____ BP: 130/80



OAT Spinal
Kadunipok

Handwritten notes and signatures including:
① 1007
WINSAT
① 1007
Pepzym
① 1007
Pepkas ✓
① 1007
FAGOVIT
① 1007
Follow Up
AMER FAKHR
Specialist

Annexure B

18



حکومت خیبر پختونخوا پاکستان
Govt of Khyber Pakhtunkhwa Pakistan



اندراج وفات سرٹیفکیٹ
Death Registration Certificate

Tracking Id: 91100019549275
CRMS No. D342606300
ULD/M REG#:

دفترا اندراج : JNGAO_KATLANG
Old CRMS No.:

Deceased Person's Details متوفی کے تفصیلات

Name :	Natar Jan	نام :	ناتظر جان
Nationality :	Pakistan	قومیت :	پاکستانی
CNIC No :	16101-1154435-0	شناختی نمبر :	16101-1154435-0
Date of Birth :	01-Jan-1954	تاریخ پیدائش :	01-Jan-1954
Gender :	Female	جنس :	عورت
Religion :	Islam	مذہب :	اسلام
Sickness Period :	00 Days 00 Months 00 Years	مدت علالت :	00 دن 00 ماہ 00 سال
Date of Death :	24-Feb-2023	تاریخ وفات :	24-Feb-2023
Date of Burial/Last rite :	24-Feb-2023	تاریخ تدفین/آخری رسومات :	24-Feb-2023
Place of Death :	sangao	جائے وفات :	سنگاؤ
Reason of Death :	Natural	وجہ وفات :	قدرتی
Nature of Death :	Normal	کیثرت وفات :	عام
Buried/Last rite at :	Sangao	جگہ تدفین/آخری رسومات :	سنگاؤ

Parental Information والدین کے تفصیلات

Father's Name :	Khan Mir	والد کا نام :	خان میر
CNIC No :		شناختی نمبر :	
Mother's Name :	Noor Janal	والدہ کا نام :	نور جنی
CNIC No :		شناختی نمبر :	

Husband's Information شوہر کے تفصیلات

Name :	Niamat Ullah	نام :	نعمت اللہ
CNIC No :	16101-1240212-1	شناختی نمبر :	16101-1240212-1

Address :	Jugl khel Village Sangao, Post Office sangao, Postal Code 23251	پتہ :	جوگی خیل گاؤں سنگاؤ، پوسٹ آفس سنگاؤ، پوسٹل کوڈ 23251
Tehsil :	Katlang	تحصیل :	کٹلانگ
District :	Mardan	ضلع :	مردان

Applicant's Details درخواست دہندہ کے تفصیلات

Name :	Niamat Ullah	نام :	نعمت اللہ
CNIC No :	16101-1240212-1	شناختی نمبر :	16101-1240212-1
Relation with Deceased :	Husband	متوفی سے رشتہ :	شوہر
Entry Date :	06-Apr-2023	تاریخ اندراج :	06-Apr-2023
Issue Date :	04-May-2023	تاریخ اجراء :	04-May-2023
Entry Status :	Normal	اندراج اسٹیٹس :	نارمل
Additional Information :		اضافی معلومات :	



مستطط سیکرٹری
ریجنل کونسل سنگاؤ
کٹلانگ ضلع مردان
SECRETARY
JNGAO Sangao Tehsil, Mardan

(19)

Annexure C

Sibtain Anwar

Psychiatry Hospital

Tel: Clinic: 0937-863628

Hospital: 0937-870452

Pharmacy: 0937-870442

Fax: 0937-863020

Not Valid For Court

Hospital:

Defense Officers Colony near

Saddar Police Station Malakand

Road Mardan

Date: _____

Date: 05-12-2023

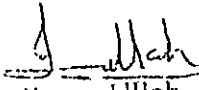
Ref: SAPH/AP-2023/623

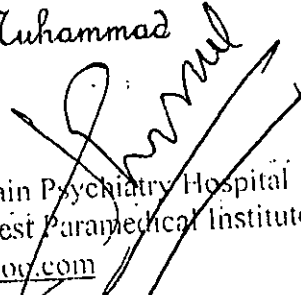
To Whom It May Concern

It is to certify that Mr. Ikram Ullah S/O Mr. Nimat Ullah bearing N.I.C # 16101-5773868-1 is suffering from Affective Disorder, his absence from service was due to his depressive phase from which he is out. he his been under my care and treatment from time to time since 2002.

It is permissible to me to grant leave to the government servant under mental health act amendment rule 2001 by President Rafique Tarar.

Signature / Thumb Impression

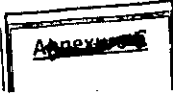

Ikram Ullah
S/O
Nimat Ullah


Dr. Shah Muhammad
M.B.B.S. (M.D)
R.M.P. (Pak)
C.B.T.
Consultant: Sibtain Psychiatry Hospital
Lecturer: East west Paramedical Institute Mardan
drshahmrd@yahoo.com

ATTACHED

(90)

AMCHA C1



DR. SIBTAIN ANWAR

Chief Consultant Neuro Psychiatrist

Mardan.

Tel: Clinic: 63628, 61094

Patient's Name

S. K. Mulla

Date

27/11/22

تظليل روز هفته اتوار

دوباره معائنہ

Sangatho

Handwritten notes in Urdu script, including numbers 5, 4, 3, 2, 1, 8, 7, 6, 5, 4, 3, 2, 1, 5, 4, 3, 2, 1, 5, 4, 3, 2, 1.

Handwritten notes in Urdu script: "Plasma M..."

Handwritten notes in Urdu script: "Electroencephalogram..."

Handwritten notes in Urdu script: "E... 37-5200"

Handwritten notes in Urdu script: "72 71"

Handwritten notes in Urdu script: "71 70 71 72"

Clinic: Opp. D.I.G. House Matakand Road, Mardan.

Handwritten notes: "Fit: Keil"



**OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpomdn@gmail.com

2023

No. 1021-24/PA

Dated 31/1/2023

ORDER ON ENQUIRY OF CONSTABLE IKRAM ULLAH NO. 2786

This order will dispose off a departmental enquiry under Police Rules 1975, initiated against Constable Ikram Ullah No. 2786, under the allegations that while posted at Police Station Rustam (Now under transfer to Guard MMC Hospital), proceeded against departmentally through Mr. Gulshed Khan, the then SDPO/Katlang vide this office Statement of Disciplinary Action/Charge Sheet No. 249/PA dated 18-08-2022, on account of absence from duty without any leave/permission of the competent authority vide DD No. 31 dated 17-05-2022 till-date, who (E.O) after fulfillment/necessary process, submitted his Finding Report to this office vide his office letter No. 559/St dated 14-10-2022, holding responsible the delinquent official of gross misconduct on the eve of non-presenting his reply in compliance of delivered Statement of Allegations/Charge Sheet, nor appearing to him (Enquiry Officer), therefore, recommended him for ex-parte action.

Being held responsible of allegations by Enquiry Officer & to further ascertain facts, on 24-12-2022, Constable Ikram Ullah was served with a Final Show Cause Notice, under Khyber Pakhtunkhwa Police Rules-1975, issued vide this office No. 13019-20/PA dated 23-12-2022, to which, he was required to submit his reply to this office within stipulated time of (07) days, but neither has he submitted his reply to this office, nor assumed duty till-date, clarifying that he is not interested in his service.

Final Order

The above discussion has clarified that Constable Ikram Ullah is not a willing worker, therefore, awarded him major punishment of dismissal from service with effect from 17-05-2022 with immediate effect, in exercise of the power vested in me under Police Rules-1975.

OB No. 243
Dated 30/01/2023

(Haroon Rashid Khan) T.SI/ PSP
District Police Officer, Mardan.

(22) 22

Annexure E



OFFICE OF THE
DEPUTY SUPERINTENDENT OF POLICE,
KATLANG

Phone & Fax No. 0937-575333
Email. sdpo.katlang@gmail.com

To: The Worthy District Police Officer,
Mardan.

No. 559/SI

Dated 14/10/2022.

Subject: DEPARTMENTAL ENQUIRY AGAINST FC IKRAM ULLAH NO2786.

Memo: Kindly refer to your good office Diary No. 249 / PA dated 18/08/2022.

In pursuance of your kind order, the undersigned completed enquiry in the above subject case. Its step-wise detail is given below.

STATEMENTS OF ALLEGATIONS:

Whereas, FC Ikram Ullah No. 2786 while posted at Police station Rustam, remained absent from duty without any leave / permission of the competent authority vide DD No. 31 dated 17.05.2022 till date.

PROCEEDINGS:

The defaulter FC Ikram Ullah No. 2786 was summoned and copy of Charge Sheet was served upon.

CONCLUSION:


He was contacted time and again to appear and produce his written statement and arrival report, but in vain, which reveals that he has no interest in official duty. It is therefore requested that he may be treated as ex-parte action, if agreed.

Encl :(11)

Submitted please.


Deputy Superintendent of Police,
Katlang Circle

Issue F.SCN


D/S/MOH
31/10/22

2022-10-14 17:30



(23)
OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpomdn@gmail.com



415
SB
2022
Annexure E1

No. 13018-20 PA

Dated 23/12/2022

FINAL SHOW CAUSE NOTICE

Constable Ikram Ullah No.2786, while posted at Police Station Rustan, remained absent from duty without any leave/permission of the competent authority vide DD No.31 dated 17-05-2022 till date.

To ascertain facts, a proper departmental enquiry against you was conducted through Mr. Gulshad Khar, the then SDPO/Katlang vide this office Statement of Disciplinary Action/Charge Sheet No.249/PA dated 18-08-2022, who (EO) after fulfillment necessary process, submitted his Finding Report to this office vide his office letter No.559/St dated 14-10-2022, holding responsible you of gross misconduct & recommended for ex-parte action.

Therefore, it is proposed to impose Major/Minor penalty as envisaged under Rules 4 (a) of the Khyber Pakhtunkhwa Police Rules 1975.

Hence, I Haroon Rashid Khan (PSP) District Police Officer Mardan, in exercise of the power vested in me under Rules 5 (3) (a) & (b) of the Khyber Pakhtunkhwa Police Rules 1975 call upon you to Show Cause Finally as to why the proposed punishment should not be awarded to you.

Your reply shall reach this office within 07 days of receipt of this Notice, failing which it will be presumed that you have no explanation to offer

You are liberty to appear for personal hearing before the undersigned.

Asgi
S/O/PS/Baizai
Received by: [Signature]

[Signature]
(Haroon Rashid Khan) T.ST/PSP
District Police Officer, Mardan.

Dated: 24/12/2022

Copy to SHC PS Baizai (Attention Moharrar) to deliver this notice upon Constable Ikram Ullah (0300-934544), Son of Nimat Ullah resident of Jogi Khel Sangao or any of his closed family member & the receipt thereof shall be returned to this office within (05) days positive.y for onward necessary action :

OFFICE OF THE
DEPUTY SUPERINTENDENT OF POLICE,
KATLANG

Phone & Fax No. 0937-575333
Email. sdpo.katlang@gmail.com

To: The Worthy District Police Officer,
Mardan.

No. 559/St

Dated 14/10/2022.

Subject: DEPARTMENTAL ENQUIRY AGAINST FC IKRAM ULLAH NO2786.

Memo: Kindly refer to your good office Diary No. 249 / PA dated 18/08/2022.

In pursuance of your kind order, the undersigned completed enquiry in the above subject case. Its step-wise detail is given below.

STATEMENTS OF ALLEGATIONS:

Whereas, FC Ikram Ullah No. 786 while posted at Police station Rustam, remained absent from duty without any leave / permission of the competent authority vide DD No. 31 dated 17.05.2022 till date.

PROCEEDINGS:


The defaulter FC Ikram Ullah No. 786 was summoned and copy of Charge Sheet was served upon.

CONCLUSION:


He was contacted time and again to appear and produce his written statement and arrival report, but in vain, which reveals that he has no interest in official duty. It is therefore requested that he may be treated as ex-parte action, if agreed.

Encl : (11)

Submitted please.


Deputy Superintendent of Police,
Katlang Circle

Issue F.SCN


DAs/MDW
31/10/22

105-712.61723

OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN

Tel No. 0937-9430109 & Fax No. 0937-923011.
Email: dpo.mdn@gmail.com

(75)
(94)

No. /PA

Dated: 31/12/23

ORDER ON ENQUIRY OF CONSTABLE IKRAM ULLAH NC.2786

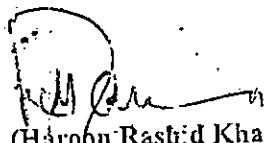
This order will dispose-off a departmental enquiry under Police Rules 1975, initiated against Constable Ikram Ullah No.2786, under the allegations that while posted at Police Station Rustam (Now under transfer to Guard MMH Hospital), proceeded against departmentally through Mr. Gulshed Khan, the then SDPO/Katlang vide this office Statement of Disciplinary Action/Charge Sheet No.249/PA dated 18-08-2022, on account of absence from duty without any leave or permission of the competent authority vide DD No.31 dated 17-05-2022 till date, who (E.O) after fulfillment necessary process, submitted his Finding Report to this office vide his office letter No.559/St dated 14-10-2022, holding responsible the delinquent official of gross misconduct on the eve of non-presenting his reply in compliance & delivered Statement of Allegations/Charge Sheet, nor appearing to him (Enquiry Officer), therefore, recommended him for ex-parte action.

Being held responsible of allegations by Enquiry Officer & to further ascertain facts. On 24-12-2022, Constable Ikram Ullah was served with a Final Show Cause Notice under Khyber Pakhtunkhwa Police Rules-1975, issued vide this office No.150/9-20/PA dated 23-12-2022, to which, he was required to submit his reply to this office within stipulated time of (07) days, but neither has he submitted his reply to this office, nor assured duty till date, clarifying that he is not interested in his service.

Final Order

The above discussion has clarified that Constable Ikram Ullah is not a willing worker, therefore, awarded him major punishment of dismissal from service with effect from 17-05-2022 with immediate effect, in exercise of the power vested in me under Police Rules-1975.

OB No. 243
Dated: 30/01/2023


(Haroon Rashed Khan) T.ST/ PSP
District Police Officer, Mardan.

Copy forwarded for information & n/action to:-

- 1) The DSsP/HQrs & Rural in Mardan.
- 2) The P.O & E.C (DPO Office) Mardan.
- 3) The In-charge Lab (HRMIS) DPO Office Mardan.
- 4) The OSI (DPO Office) Mardan with 15 Sheets.



OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpomdn@gmail.com

95

Better copy
Signature
F-1

2022

No. 258 /PA

Dated 18/8/2022

DISCIPLINARY ACTION

I, IRFAN ULLAH KHAN (PSP), District Police Officer Mardan, as competent authority am of the opinion that Constable Ikram Ullah No.786, himself liable to be proceeded against, as he committed the following acts/omissions within the meaning of Police Rules 1975.

STATEMENT OF ALLEGATIONS

Whereas, Constable Ikram Ullah No.786, while posted at Police Station Rustam, remained absent from duty without any leave/permission of the competent authority vide DD No.34 dated 17-05-2022 till-date.

For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, Mr. Gulshed Khan SDPO Kallang Mardan is nominated as Enquiry Officer.

The Enquiry Officer shall, in accordance with the provision of Police Rules 1975, provides reasonable opportunity of hearing to the accused Police Official, record/submit his findings and make within (30) days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused Official.

Constable Ikram Ullah is directed to appear before the Enquiry Officer on the date +time and place fixed by the Enquiry Officer.

(Irfan Ullah Khan) PSP
District Police Officer
Mardan

1155
0341-593 8552
5773 868-1
0300-9345448
0301-8188875
746-71261725

گورنمنٹ ٹیبلٹ پبلسھنگ ہاؤس، لاہور۔ 10.1.57ء۔ نمبر 1000

اپیل

برائے عالی ملازمت مقررہ نفاذ حکم

مہتاب - 5. P.O. - لاہور

جوائنڈ 243 OB No 503 01.02.3

مہتاب پراسسنگ نندہ کنٹریل 2786 انٹرنیشنل

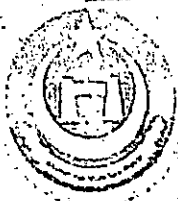
ٹیبلٹ پبلسھنگ ہاؤس، لاہور

- 1- 1959ء سے 1960ء تک نفاذ ہونے والے حکم
- 2- 1960ء سے 1961ء تک نفاذ ہونے والے حکم
- 3- 1961ء سے 1962ء تک نفاذ ہونے والے حکم
- 4- 1962ء سے 1963ء تک نفاذ ہونے والے حکم
- 5- 1963ء سے 1964ء تک نفاذ ہونے والے حکم
- 6- 1964ء سے 1965ء تک نفاذ ہونے والے حکم
- 7- 1965ء سے 1966ء تک نفاذ ہونے والے حکم
- 8- 1966ء سے 1967ء تک نفاذ ہونے والے حکم
- 9- 1967ء سے 1968ء تک نفاذ ہونے والے حکم
- 10- 1968ء سے 1969ء تک نفاذ ہونے والے حکم
- 11- 1969ء سے 1970ء تک نفاذ ہونے والے حکم
- 12- 1970ء سے 1971ء تک نفاذ ہونے والے حکم

ٹیبلٹ پبلسھنگ ہاؤس، لاہور

242 2428/38

الحمد لله



OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN

2023

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpomdn@gmail.com

No. 1021-24 /PA

Dated 31/1/2023

ORDER ON ENQUIRY OF CONSTABLE IKRAM ULLAH NO.2786

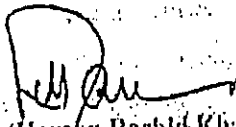
This order will dispose-off a departmental enquiry under Police Rules 1975, initiated against Constable Ikram Ullah No.2786, under the allegations that while posted at Police Station Rustam (Now under transfer to Guard MMC Hospital), proceeded against departmentally through Mr. Gulshed Khan, the then SDPO/Katlang vide this office Statement of Disciplinary Action/Charge Sheet No.249/PA dated 18-08-2022, on account of absence from duty without any leave/permission of the competent authority vide DD No.31 dated 17-05-2022 till-date, who (E.O) after fulfillment necessary process, submitted his Finding Report to this office vide his office letter No.559/St dated 14-10-2022, holding responsible the delinquent official of gross misconduct on the eve of non-presenting his reply in compliance of delivered Statement of Allegations/Charge Sheet, nor appearing to him (Enquiry Officer), therefore, recommended him for ex-parte action.

Being held responsible of allegations by Enquiry Officer & to further ascertain facts, on 24-12-2022, Constable Ikram Ullah was served with a Final Show Cause Notice, under Khyber Pakhtunkhwa Police Rules-1975, issued vide this office No.13019-20/PA dated 23-12-2022, to which, he was required to submit his reply to this office within stipulated time of (07) days, but neither has he submitted his reply to this office, nor assumed duty till-date, clarifying that he is not interested in his service.

Final Order

The above discussion has clarified that Constable Ikram Ullah is not a willing worker, therefore, awarded him major punishment of dismissal from service with effect from 17-05-2022 with immediate effect, in exercise of the power vested in me under Police Rules-1975.

OB No. 243
Dated 30/01 2023


(Haroon Rashid Khan) T.S/PSP
District Police Officer, Mardan.

(23)

Annex I

ORDER

This order will dispose-off the departmental appeal preferred by Ex-Constable Miran Ullah No. 2703 of Mardan District Police against the order of the then District Police Officer, Mardan, whereby he was awarded major punishment of dismissal from service vide OB No. 243 dated 30.01.2023. The appellant was proceeded against departmentally on the allegations that he while posted at Police Station Mardan District Mardan absented himself from his lawful duty without any leave or prior permission of the competent authority vide daily diary No. 31 dated 17.05.2022 the date of his dismissal from service.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and the then Sub Divisional Police Officer, (SDPO) Katlang, Mardan was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities submitted his findings wherein he reported that the delinquent Officer was contacted time and again to appear before the enquiry Officer, but he failed and remained absent, which showed that he was no more interested in Police Service. He recommended the delinquent Officer for ex-communication.

The then District Police Officer, Mardan perused the findings and by agreeing with the recommendations of Enquiry Officer issued him Final Show Cause Notice, but the delinquent Officer neither submitted his reply nor assumed his duty, therefore, he was awarded major punishment of dismissal from service from the date of absence by the then District Police, Mardan vide OB No. 243 dated 30.01.2023.

Feeling aggrieved from the order of the then District Police Officer, Mardan, the appellant preferred the instant appeal. He was summoned and heard in person in Court Room held in his office on 17.06.2023.

On perusal of the enquiry file and service record of the appellant, it has been found that allegations levelled against the appellant have been proved beyond any shadow of doubt. As he has bitterly failed to produce any cogent reason to justify his absence because the same clearly depicts his casual and lethargic attitude towards his official duties. The very conduct of appellant is unbecoming of a disciplined Police Officer. On perusal of previous service record of the appellant, it was noticed that he is habitual absentee and prior to this, the appellant was also dismissed from service twice for his disinterest in the official duties. Hence, order passed by the competent authority does not warrant any interference. Besides the

29

above, the appellant approached this forum at a belated stage by filing the instant appeal which is badly time barred for 04 months and 13 days without advancing any cogent reason regarding such delay.

Keeping in view the above, I, Muhammad Suleman, PSP Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit as well as badly time barred for 04 months and 13 days.

Order Announced.

(MUHAMMAD SULEMAN) PSP
Regional Police Officer
Mardan.

Rec. 6-002 /ES, Dated Mardan the 12/10/2023

Copy forwarded to District Police Officer, Mardan, for information and necessary action w/r to his office Memo: No. 106/LB dated 14.07.2023. His Service Record is returned herewith.

بخدمت جناب انسپکٹر جنرل آف پولیس صوبہ خیبر پختونخواہ پشاور

منسوخ اپیل برخلاف حکم جناب DIG صاحب مردان بحوالہ چھٹی نمبر 6002 تاریخ 12-09-2023

اور DPO صاحب ضلع مردان بحوالہ چھٹی نمبر 243 OB No: مورخہ 30-01-2023 بنام اکرام اللہ نمبر

FC-2786 ضلع مردان و بحالی ملازمت کے حکم صادر فرمائیں۔

درخواست اپیل منجانب سائل کا نشیبل حسب ذیل عرض ہے

جناب عالی

☆ سائل کا نشیبل اکرام اللہ نمبر FC-2786 ملکہ پولیس مردان میں سال 2009 کا بھرتی ہے اور دوران ڈیوٹی اپنے بالا افسران پولیس کو کبھی شکایت کا موقع نہیں دیا اور نہ ہی ڈیوٹی میں غفلت وغیرہ حاضری برتی ہے۔ اور ہمیشہ اپنی ڈیوٹی ایمانداری سے سرانجام دینے کی کوشش کی ہے۔ آپ صاحب کی اطلاع کیلئے عرض کی جاتی ہے کہ سائل کا نشیبل کو کنگم جناب DPO صاحب مردان نے چھٹی نمبر 243 تاریخ 30-01-2023 کو 17-05-2022 سے ملازمت سے برطرف کرنے کے احکامات صادر فرمائے۔ جس کو وجہ ذیل میں بیان کی جاتی ہے۔

☆ سائل تھانہ رستم مردان میں تاریخ 14-05-2022 کو دوران ڈیوٹی والدہ صاحبہ کی شدید بیماری کی اطلاع موصول ہوئی اور متعلقہ تھانہ سے چھٹی لیکر گھر گیا، گھر پہنچنے پر معلوم ہوا کہ والدہ صاحبہ کی طبیعت انتہائی نازک ہے۔ اور والدہ کو (Anemia, Arthritis) جیسی موذی بیماریاں لاحق ہو گئی تھیں۔ جن کا علاج راولپنڈی، اسلام آباد کے مختلف ہسپتالوں سے کراتا رہا۔ ڈاکٹرز کے (Prescriptions) منسلک ہیں۔ اور تقریباً ہر مہینے ڈاکٹرز کو چیک کراتا رہا، مگر بیماری کی شدت کی وجہ سے 24-02-2023 کو والدہ صاحبہ کا انتقال ہوا۔ جس کے بارے میں کا نشیبل اکرام اللہ نے تھانہ رستم مردان کو والدہ صاحبہ کے فوت ہونے کی بروقت اطلاع دی۔ والدہ صاحبہ کے وفات کا صدمہ برداشت نہ ہونے پر سائل موقع پر بے ہوش ہو گیا اور ڈپریشن اور بیماری کی وجہ سے کئی ہفتوں تک علاج کراتا رہا۔ اور ساتھ ہی کئی درخواستیں مقامی تھانہ کو بھی دیتا رہا مگر ساری درخواستوں پر کوئی عمل نہیں ہوا۔ اور آخر کار سائل کا نشیبل کو بیچہ غیر حاضری نوکری سے 17-05-2022 کو برطرف کر دیا گیا۔ سائل نے اس بارے میں جناب DPO صاحب مردان اور DIG صاحب مردان کو نوکری کی بحالی کی درخواست گزاری بھی کی، لیکن سائل کی کہیں یہ بھی نہیں سنی گئی۔ اور پوری تفصیل مندرجہ ذیل ہے۔

DIG صاحب مردان بحوالہ چھٹی نمبر 6002 تاریخ 12-09-2023 Anx-A :

DPO صاحب ضلع مردان بحوالہ چھٹی نمبر 243 OB No: مورخہ 30-01-2023 Anx-B :

سائل کے میڈیکل کاغذات : Anx-C :

سائل کے والدہ صاحبہ کے میڈیکل کاغذات : Anx-D :

☆ جناب والا سائل ایک ہال بچے دار شخص ہے اور آج کل بے روزگاری کی وجہ سے گھریلو حالات انتہائی خراب ہیں، جبکہ ایک طرف والدہ صاحبہ کی وفات کا صدمہ اور دوسری طرف ملازمت کی برطرفی کی وجہ سے سائل انتہائی نازک حالات سے گزر رہا ہے۔

☆ جناب عالی سائل کی طرف سے انتہائی موذی ہانہ استدعا ہے کہ سائل کو اپنی سابقہ ملازمت پر بحال کرانے کے احکامات صادر فرمائیں، آپ صاحب کی اس مہربانی پر سائل عمر بھر آپ اور آپ صاحب کے بچوں کیلئے ہمیشہ دعا گو رہے گا۔

مورخہ: 21-09-2023

دستخط کا نشیبل:

آپ کا فرمانبردار

اکرام اللہ ولد نعمت اللہ (کا نشیبل FC-2786)

موبائل نمبر: 0342-2228138, 0300-9345448



3016 (31)
08/9/23

Annex I-25

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

No. SI/2429/23, dated Peshawar the 04/10/2023

To: The Regional Police Officer,
Mardan.

Subject: REVISION PETITION.

Memo:
The Competent Authority has examined and filed the revision petition submitted by Ex-FC Ikram Ullah No. 2786 of District Mardan, against the punishment of dismissal from service awarded by DPO Mardan vide OB No. 243, dated 30.01.2023 being badly time barred. The applicant may please be informed accordingly.

482/EC
16-10-23

EC/DPO Mardan
For action.

(Signature)
4/10
(AFSAR JAN)
Registrar.
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

(Signature)
RPO Mardan
5/10/23

(5)

(32)



**OFFICE OF THE
DISTRICT POLICE OFFICER
MARDAN**

Tel: 0937-9230109
Fax: 0937-9230111
Email: dpo_mardan@yahoo.com
Facebook: District Police Mardan
Twitter: @dpomardan

No. 3932-2/PA

Dated 3.10 /2017

ORDER ON ENQUIRY OF CONSTABLE IKRAMULLAH NO.2783

This order will dispose-off a departmental enquiry under Police Rules 1975, initiated against the subject Police Official, under the allegations that while posted at Police Station City. (Now PS Saro Shah), faced departmentally through Inspector Ikhtiraz Khan, Acting DSP HQrs. Mardan vide this office Disciplinary Action No. 1283-84/PA dated 03.02.2017 on account of One Month & Seven days absence's period without any leave/permission of the competent authority vide DD report No. 11 dated 22.12.2016 to DD report No. 52 dated 19.01.2017, who after fulfilling necessary process, submitted his finding report to this office, vide his office letter No. 481 HQrs. dated 10.06.2017, holding responsible the alleged Constable for gross misconduct & recommended for major punishment.

Final Order

Constable Ikramullah was called twice for O.R held on 19.07.2017 & 16.08.2017, but he did not bother to comply with, meaning that he has nothing to offer in his defense, so awarded him major punishment of dismissal from service with immediate effect with counting his absence's period as leave without pay, in exercise of the power vested in me under Police Rules 1975.

O.B No. 1445

Dated 18/10/2017


**District Police Officer,
Mardan.**

Copy forwarded for information & n/action to:-

1. The SP Operations Mardan.
2. The SDPO Takht-Bhai & DSP/HQrs Mardan.
3. The Pay Officer & Estt. Clerk (Police Office) Mardan.
4. The OSI (Police Office) Mardan with () Sheets.

34

ORDER.

This order will dispose-off the appeal preferred by **Ex-Constable Ikramullah** No. 2783 of Mardan District Police against the order of District Police Officer, Mardan, whereby he was awarded Major Punishment of dismissal from service vide OB: No. 1998 dated 18.08.2017.

Brief facts of the of the case are that he while posted at Police Station City, (Now PS Saro Shah), had absented himself for One month & Seven Days without any leave/permission of the competent authority and reported vide DD No. 11 dated 22.12.2016 to DD No. 52 dated 19.01.2017. In this connection, the appellant was charge sheeted vide District Police Officer, Mardan office No. 1283-84/PA, dated 03.02.2017 and also proceeded against departmentally through **Ikhtiraz Khan DSP/HQrs: Mardan**, who after fulfilling necessary process, submitted his findings to the District Police Officer, Mardn vide his office letter No. 481/HQrs, dated 20.06.2017, The allegations have been established against him and recommended for major punishment. Keeping in view the facts collected during inquiry, the appellant was called upon in the orderly room but he could not defend plausibly his fault and was awarded major penalty of dismissal from service vide this office OB No. 1998 dated 18.08.2017.

He was called in orderly room held in this office on **08.06.2018** and heard him in person. The penalty of dismissal from service is too harsh and as well as poor family circumstances, therefore, he is re-instated in service and major punishment of dismissal from service is **converted into Minor Punishment of Censure**. However, the intervening period including absence period shall be counted towards service but not on duty. He will not be entitled for any kind of financial benefits including monthly salary for the said period.

ORDER ANNOUNCED.

(Muhammad Alam Shinwari)PSP
Regional Police Officer,
Mardan

No. 3744 /ES, Dated Mardan the 11/06 /2018.

Copy to District Police Officer, Mardan for information and necessary action w/r to his office Memo: No. 408/LB dated 30.06.2018. The Service Roll is returned herewith.

(*****)

CB/EC, PC/CS
for information

DPC Mardan

OP. 1227
19 Oct 18

(35)

Dr. Sibtain Anwar

Neuro Psychiatrist Mardan

Tel: Clinic: 0937-863628
Res: 0937-861094
Doctor Mobile: 0300-9175573
Fax: 0937-863020



Hospital:
Sibtain Anwar Psychiatry
Hospital Defense Officer
Colony near Saddar Police
Station Malakand Road
Mardan

Date: _____

Ref: SAPH/AP-2013/301

Date: 30-04-2018

To Whom It May Concern

It is to certify that Mr. Ikram Ullah S/O Mr. Niamat Ullah bearing N.I.C # 16101-5773868-1 is suffering from Affective Disorder, his absence from service was due to his depressive phase from which now he is out. He has been under my care and treatment from time to time since 2002.

It is permissible to me to grant leave to the government servant under mental health act amendment rule 200, by President Rafique Tarar.

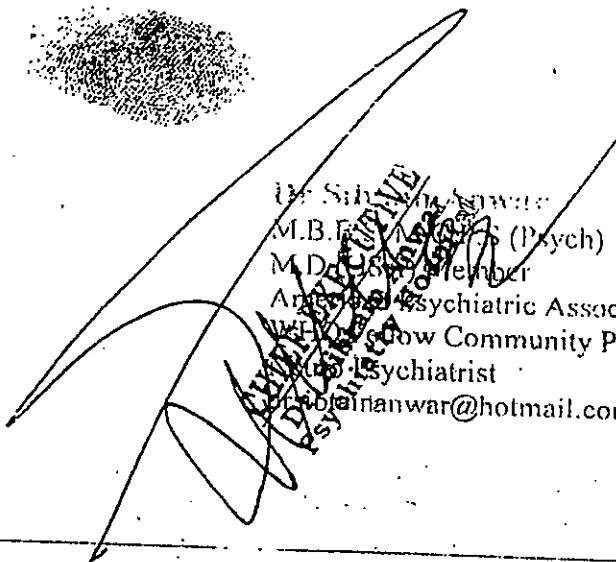
Signature / Thumb Impression

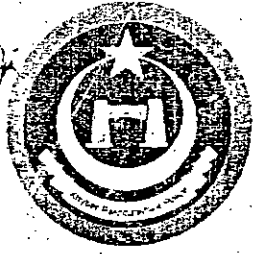

Ikram Ullah
S/O
Niamat Ullah



Checked By:


Talha Ibrahim


Dr. Sibtain Anwar
M.B.F. A.S.P.S (Psych)
M.D. (Psychiatry) Member
Association of Psychiatrists
Khyber Pakhtunkhwa Community Psychiatric
Neuro Psychiatrist
sibtainanwar@hotmail.com



**OFFICE OF THE
DISTRICT POLICE OFFICER,
MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111
Email: dpo_mardan@yahoo.com

2019

No. 996467 /PADated 7/5 /2019

ORDER ON ENQUIRY OF CONSTABLE IKRAM ULLAH NO.2786 PS SADDAR

This order will dispose-off a Departmental Enquiry under Police Rules 1975, initiated against the subject official, under the allegations that while posted at Police Station Saddar. Proceeded against departmentally through ASP Ziaullah SDPO Takht-Bhai vide this office Statement of Disciplinary Action Charge Sheet No.9610-11/PA dated 24-12-2018, on account of 741 days absence's period from duty without any leave/approval of the competent authority vide DD No.12 dated 15-10-2018 to DD No.14 dated 31-12-2018, who (E.O) after fulfilling necessary process, submitted his Findings to this Office vide his Office letter No.109 ST dated 17-11-2018, holding responsible the alleged official of gross misconduct.

Worth mentioning here that he again absented himself from duty without any leave approval of the competent authority vide DD No. 07 dated 31.12.2018 till-date.

Final Order

Constable Ikram Ullah was called for 12-03-2019, 02-04-2019, 09-04-2019 & 30-04-2019 to appear before the undersigned in OR, but he failed to comply with, meaning that he has nothing to offer in his defense, besides non-interesting in Police Service, therefore, award him **major punishment of dismissal from Police Force with effect from 15-10-2018** with immediate effect, in exercise of the power vested in me under P.R 1975.

OB No. 992Dated 3/5 /2019.

(Sajjad Khan) PSP
District Police Officer
Mardan

•Copy forwarded for information & n/action to:-

- 1) The SDPO/City Mardan.
- 2) The DSP/HQrs Mardan.
- 3) The P.O. & E.C (Police Office) Mardan.
- 4) The OSI (Police Office) Mardan with () Sheets.

37 (3)

1

ORDER.

This order will dispose-off the appeal preferred by Ex-Constable **Ikram Ullah No. 2786** of Mardan District Police against the order of District Police Officer, Mardan, whereby he was awarded Major punishment of Dismissal from service vide OB No. 992 dated 03.05.2019.

Brief facts of the case are that, the appellant while posted at Police Station Saddar, Proceeded against departmentally through ASP Ziaullah SDPO Takht-Bhai, on account of (74) days absence's period from duty without any leave/approval of the competent authority vide daily diary No.12 dated 15-10-2018 to daily diary No.14 dated 31-12-2018. The Enquiry Officer after fulfilling necessary process, submitted his Findings, holding responsible the alleged official of gross misconduct. Worth mentioning here that he again absented himself from duty without any leave/approval of the competent authority vide daily diary No. 07 dated 31.12.2018 till-date of dismissal. (total absentee 06 months & 18 days.

Constable Ikram Ullah was called in Orderly Room on 12-03-2019, 02-04-2019, 09-04-2019 & 30-04-2019 to appear before the District Police Officer, Mardan in Orderly Room, but he failed to comply with, meaning that he has nothing to offer in his defense, besides not-interesting in Police Service, therefore, awarded him major punishment of dismissal from Police Force with effect from 15-10-2018.

He was called in orderly room held in this office on 27.08.2019 and heard him in person. Taking a lenient view, the punishment of dismissal from service is converted into Forfeiture of two (02) years approved service and he is re-instated in service. The period he remained out of service is treated as leave without pay.

ORDER ANNOUNCED.

Muhammad Ali Khan
(MUHAMMAD ALI KHAN)PSP
Regional Police Officer,
Mardan.

No. 10852 ES, Dated Mardan the 30/08 /2019.

Copy to District Police Officer, Mardan for information and necessary action w/r to his office Memo: No. 335/LB dated 07.08.2019. His Service Record is returned herewith.

(****)

DSP Legal
OB/EC/OSI/PO

For information w/r to Mardan

District Police Officer
Mardan

1854
4.9.19

726
5-9-98

19

nt

o

led

st

2

sh



DR. SITTAIN ANWAR
Chief Consultant, Neuro Psychiatrist
Mardan
Tel: Clinic: 63628, 51094

Patient's Name

J. Kamal

Date

27 NOV 2002

تقریر سے مندرجہ ذیل

دوبارہ معائنہ 29

Singh

Handwritten notes in Urdu script, including the number '4' and '6.5'.

Handwritten signature: Rameez M. Khan




Handwritten signature: Dr. Sittain Anwar

Handwritten signature: Dr. Farooq

Handwritten signature: Dr. Anwar

Opp. D.G. House, Iskand Road, Mardan.

Handwritten notes and dates: 7/18, 9/12

50	22419	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈوکیٹ: جاوید احمد کاکڑ	PESHAWAR BAR ASSOCIATION	
بار کونسل ایسوسی ایشن نمبر: 7874-17 B.C		
رابطہ نمبر: 0314 9549658		

بعدالت جناب: سروس ٹریبونل پشاور

Appellant	مخائب:
	دعوی:
	غلت نمبر:
	مورخہ:
	جرم:
	تھانہ:
بابت تحریر آگہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
آن مقام پشاور کیلئے جاوید احمد کاکڑ ایڈووکیٹ اور شہداء اعلیٰ کورٹ پشاور کی طرف سے

کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب باہندانہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 29/11/20

المواہ شد العبد

مقام پشاور کے لیے منظور ہے۔

Jaamil

أشركم الله وله نعمت الله سنة محمد صلى الله عليه وسلم

Accepted