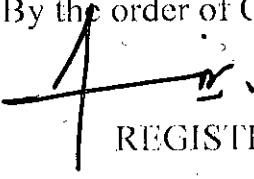


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No.** 64/2024

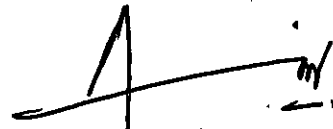
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	03/01/2024	<p>The appeal of Mr. Muhammad Shair Khan resubmitted today by Mr. Muhammad Ayaz Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at D.I.Khan on _____ . Parcha Peshi is given to counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Muhammad Shair Khan received today i.e on 12.12.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- not removed* 1- ✓ Check list is not attached with the appeal.
- not removed* 2- ✓ Address of appellant is incomplete be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- ✓ Memorandum of appeal is not signed by the appellant.
- 4- ✓ Copy of show cause notice mentioned in para-4 of the memo of appeal (Annexure-B) is not attached with the appeal be placed on it.
- 5- Annexures of the appeal are not in sequence. Page no. 11, 12 and 13 of the appeal are illegible which may be replaced by legible/better one.
- 6- The documents that are to be provided must be legible/readable.
- 7- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3849 /S.T.

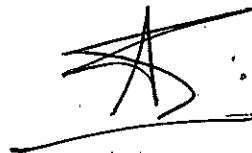
DL 13/12 /2023.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Ayaz Khan Adv.  
High Court Peshawar.

### Objections:

1. Objection (1) is cleared.
2. Removed.
3. Removed.
4. Copy of show cause notice sent to appellant.
5. Removed.
6. Removed.
7. Removed.



BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. 64 /2023

Shair khan

VERSUS

Superintendent of Police and Others

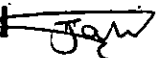
INDEX

S#	Description Of The Documents	Annex	Pages
1	Service Appeal Along Affidavit	*	1-3
2	Copy of MEDICAL Reports	A	4-9
3	Copy of show cause notice & final report	B	10-13
4	Copy of impugned order 19/04/2023	C	14
5	Copy of departmental appeal and order dated 19/10/2023	D	15-16
6	Vakalat nama	E	17

Through

Appellant

  
Muhammad Ayaz Khan

And 

Jan Muhammad

ADVOCATE HIGH COURT

And 

Israr Iqbal Advocate

Dated: 12/12/2023

# BEFORE KPK SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

S.A No. 64 /2023<sup>4</sup>

Diary No. 9839

Dated 12-12-2023

**Muhammad shair khan**

R/o of makeen, chlaraishamkkhel tehsil makeen, district south Waziristan presently berunganj, batpandhu road sheikh abad no 3, Peshawar.

..... Appellant

**VERSUS**

1. **Superintendent of Police (Investigation)**, South Waziristan tribal district.
2. **District Police Officer**, South Waziristan tribal district.
3. **Regional Police Officer /DIG**, deraismail khan region ..
4. **Provincial Police Officer/Inspector General of Police**, KPK Peshawar.

..... Respondents

**APPEAL U/S 4 OF KP SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 19/04/2023 WHEREBY THE APPELLANT WAS AWARDED MAJOR PENALTY OF DIMISSAL FROM SERVICE AS WELL AS AGAISNT THE ORDER DATED 19/10/2023 WHEREBY HIS DEPARTMENTAL APPEAL WAS TURNED DOWN.**

**Respectfully Sheweth**

1. That the appellant is the bona-fide resident of makeen, chlaraishamkkhel tehsil makeen, district south Waziristan presently berunganj, batpandhu road sheikh abad no 3, Peshawar.
2. That on 18/09/2022 the appellant was selected for training at PTS shakas vide office letter no 10367 dated 18/09/2022.
3. That the appellant could not attend the training session regularly because he was suffering from piles. **(COPY OF MEDICAL REPORTS IS ATTACHED AS ANNEXURE-A).**
4. That the respondent no. 01 issued a show cause notice and resultantly enquiry was levelled against the appellant **(copy of show cause notice is attached as annexure-B)**
5. That on the recommendation of enquiry committee, the appellant was awarded major punishment, resultantly the appellant was dismissed from the service vide order, dated 19/04/2023, and the appellant was

- not informed nor any copy of the order was issued in writing to the official concerned **(copy of the impugned order is attached as annexure-C)**
6. That the appellant preferred a departmental appeal through provincial police officer (PPO), Central police office, KPK, Peshawar on which was turned down for being time barred. **(Copy of departmental appeal and order are attached as annexure-D)**
  7. That feeling aggrieved, the appellant seeks indulgence of this honorable Tribunal, *inter alia*, on the following grounds.

#### **GROUND:**

- A. That the impugned order as well as the order passed by the Departmental Authority are based on conjectures and surmises, hence untenable.
- B. That admittedly, the appellant was not associated with any sort of inquiry, therefore, the impugned order has nullity in the eyes of law.
- C. That the impugned order carries no reason, what to speak of a plausible one, hence goes contrary to section 24-A of the General Clauses Act 1897. On this score too, the impugned order needs rectification by the Honorable Tribunal.
- D. That the order passed by the Departmental Authority is also non speaking one, as the same lacks reason and logic which is against the principles of fair play and justice.
- E. That the impugned order has been passed at the back of the appellant hence it is against the norms of justice.
- F. That the appellant has not been treated in accordance with law rather he has been discriminated, which goes contrary to Articles 4 and 25 of the Constitution of Pakistan 1973, hence needs rectification by the Hon'ble Tribunal.
- G. That the impugned orders are against the law, rules and policy on the subject, hence untenable.
- H. That the appellant seeks leave of the Hon'ble Tribunal to urge additional grounds at the time of arguments.

#### PRAYER:


**In view of the foregoing facts, it is, therefore, most humbly prayed that the impugned orders dated**

19/04/2023 and 09/10/2023 may please be set aside and the respondents be please directed to reinstate the appellant into service with all back benefits.

Any other remedy to which the appellant is found fit in law, justice and equity may also be granted.

Through

Appellant

  
Muhammad Ayaz Khan

And 

Jan Muhammad  
ADVOCATE HIGH COURT

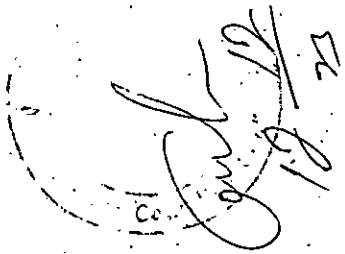
And 

Israr Iqbal Advocate

AFFIDAVIT

It is hereby verified and declared on oath that the contents of above Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

  
Deponent



Surgical Consultant

Dr. Muhammad Bilawal Khan

M.B.B.S (KMC, Pesh)

M.C.P.S (Pak)

F.C.P.S (Pak)

Laposcopic & General Surgeon

Police & Services Hospital Peshawar

→ Cron 17/2

→ 5/20/2

→ Ougens

→ vide-2

→ Gabaars



*[Handwritten signature]*

Name: M. Shaker

Gender: Male

Age: 35/2

Date: 28/11/22

Clinical Record

Rx

*[Handwritten notes: Post 1/2]*

*[Handwritten notes: Prop spine, Anxial]*

Tas Citanew 10mg

*[Handwritten notes: 1 + 1]*

Xylocain gel

Syp

lenaloran 200mg

Tas

sterlan 100mg

Tal

1000 of len - p

*[Handwritten notes: 1 + 1]*

Tas

Doflou 500p

Tal

AIP 0.5mg

ATTESTED

*[Handwritten notes: 1 + 1]*

*[Handwritten signature]*

Not Valid For Court

Clinic # 091-5711751

0305-9532602

0334-9034165

معدہ، آنت، اپنڈکس، ہرنیا، پتہ، بواہیر، گردہ، مثانہ، پراسٹیٹ، جگر، چھاتی اور کینسر

آفریدی سٹیجیوکل کالج (کلینک نمبر SF-24) ترمال بین یونیورسٹی روڈ پشاور

(5)

Surgical Consultant

Dr. Muhammad Bilawal Khan

M.B.B.S (KMC, Pesh)

M.C.P.S (Pak)

F.C.P.S (Pak)

Laposcopic & General Surgeon

Police & Services Hospital Peshawar



Name: M. Shaleer Gender: ? Age: 35y Date: 20/1/18/20

Clinical Record

Rx

Bleeding PR  
Swelling of rectum  
open 9x8 cm

Herein

Admitted for  
Haemorrhoidectomy & fistula  
on rectal canal

rectal  
swelling

Adms

Hep B and C

- CBC

ATTESTED

Not Valid For Court

Clinic # 091-5711751

0305-9532602

0334-9034165

ناہر امراض، معذور، آنت، اینڈوکس، ہرنیا، پتہ، بوا سیر، گردہ، مثانہ، پرائیٹ، جگر، خجائی اور کینسر

آفریدی میڈیکل کیمپس (کلینک نمبر SF-24) جیکال مین ہسپتال روڈ پشاور

9



Sourinier Hospital

سورينير هسپتال

طريق 111

0311 9399873

سورينير

Hospital



سولہ سہ جنرل ہسپتال

### Operation Note

(To be filled by Consultant Surgeon)

Admission No: \_\_\_\_\_

Date: 20/10/2022

Patient's Name: \_\_\_\_\_

Age/Sex: 36Y M

Consultant: M. Shalies

Ward/Room: \_\_\_\_\_ Bed No: \_\_\_\_\_

Scrub Nurse: Dr. M. Pastana

Anaesthetist: Dr. M. Asad

Scrub OTA: \_\_\_\_\_

Anaesthesia Tech: Irfan

Type of Anaesthesia: GA  LA  Spinal  Epidural

Time In: 6:25 PM Total Time: \_\_\_\_\_  
Time Out: 7:10 PM Hrs: \_\_\_\_\_ Min: \_\_\_\_\_

PRE OP DIAGNOSIS: ① Haemorrhoidectomy + fistulectomy

Operation Notes and Finding: 3, 7, 11° clock haemorrhoids + fistula at 5 o'clock  
wells GA and A&M pulses dropped - Abdominal tenderness noted then haemorrhoidectomy done followed by fistulectomy

Antibiotic during surgery: cefixime cavity - given pre & post

Analgesic during surgery: \_\_\_\_\_

Post Operative Diagnosis: ② Haemorrhoidectomy + fistulectomy

Post Op. Treatment & Advice: (Instructions for ward/ICU staff)

ATTESTED

Remarks: \_\_\_\_\_

Surgeon's Assistant Sign: \_\_\_\_\_

Surgeon's Sign: \_\_\_\_\_



# Discharge Summary Sheet

(To be filled by on duty Medical officer/Consultant Opinion)

Adm No:	152210207	Date:	20-10-22
Patient's Name:	M Ghaur Khan	S/D/W/O:	Carik Khan
Age:	36	Sex:	m
Consultant Name:	M Bilawal Khan	Date of Admission:	20-10-21
Diagnosis:	Heamorrhoids	Date of Discharge:	21-10-22
Investigations done at hospital:	<input checked="" type="checkbox"/> Blood CP <input checked="" type="checkbox"/> BSR <input checked="" type="checkbox"/> Viral Marker B/C <input type="checkbox"/> US	<input type="checkbox"/> X-Ray <input type="checkbox"/> ECG/ECHO <input type="checkbox"/> LFTs <input type="checkbox"/> RFTs	<input type="checkbox"/> CT/BT <input type="checkbox"/> MRI <input type="checkbox"/> CT <input type="checkbox"/> Covid-19
HX:	Hemorrhoidectomy		

Medicine	Dosage	Days
1. Inf. Flagyl	1/2 P.D.	
2. Inf. Stadol + Glycerin	1/2 P.D.	
3.		
4.		
5.		
6.		

Medicine	Dosage	Days
1. Flagyl 400	1 + 1 + 1	
2. Ceftriaxone	1 P.D. / 5 days	
3. Xylometazoline gel	1 + 1	
4.		
5.		
6.		

Follow Up & Others: *Dr. P*

Instructions for Home:

Patient's condition at the time of discharge: **ATTENDED**

Discharged by Medical officer/Ward/ICU: Dr. *[Signature]*

Sign: *[Signature]*





SERVICES HOSPITAL PESHAWAR  
GOVERNMENT OF KPK  
OPD REGISTRATION

RS. 10/-

M. SHAHEER KHAN 36 MALE

Name: GENERAL OPD Age: PESHAWAR Sex:

Department: 257659-22 Address:

Hospital Yearly No. Dated:

History

Pain Abdomen

Ref to Surgical OPD  
15/11/23

Clinical Examination

Provisional Diagnosis

Investigations

Surgeon  
Service Hospital  
Peshawar

*[Handwritten Signature]*

Doctor on Duty

*[Handwritten Signature]*

Doctor's Signature

ATTESTED



M.R.# S22110473  
 TIME: 22.Nov.04 4:31 PM  
 Fee Rs. 200

Emergency  
 Emergency

سویٹر جنرل ہسپتال

Muhammad Shaheer

36-Years

Male

04-Nov-2022

4:31 PM

Peshawar

Name \_\_\_\_\_ Age \_\_\_\_\_ Sex \_\_\_\_\_ Date \_\_\_\_\_ Address \_\_\_\_\_

Patient Complaints

(post OPP)

Hemorrhoidectomy +

Fistula

Follow up

patient

Examination/Findings

Refer to Dr. M. Bilawal  
 Khan

*[Signature]* ATTESTED  
 04/11/2022

سویٹر جنرل ہسپتال

Investigations:

Not Valid for Court

Souvenir General Hospital, Main Dalazak Road, Peshawar. Ph: +92 91 2602995

E-mail: info@sgh.com.pk website:www.sgh.com.pk

نور - نور  
ع 2 - 3

افر

xylocain gel

ل.ت

CIN cream

ل.ت

Tas

Peny, 400p

Tap

Nezari

ل.ت ل.ت ل.ت

Sup, ل.ت

Tap

Penoflex P

ل.ت ل.ت

Ty

Daflon 500p

ل.ت ل.ت

2 Bu p

ل.ت

ضلع ساؤتھ وزیرستان

فائنڈنگ رپورٹ

دفتر پولیس

جناب عالی

بحوالہ محکمانہ انکوائری برخلاف کنسٹیبل ~~شمار نمبر~~ کنسٹیبل  
 بیٹ نمبر ~~112-24~~ معروف ہوں کہ مذکورہ کنسٹیبل بحوالہ لیٹر  
 نمبر 1037 مورخہ 18-09-2022 جناب ڈی پی او صاحب نے پولیس  
 ٹریننگ سینٹر شاکس کے لیے سلیکٹ کیا تھا اور مذکورہ نے ٹریننگ سینٹر  
 میں حاضری پیش نہ کی جسکو جناب ڈی پی او صاحب نے چارج شیٹ  
 کر کے انکوائری من ایس۔ پی۔ انویسٹیگیشن کے نام مارک کر دی۔

اندریں سلسلہ میں کنسٹیبل۔ مذکورہ کو بزرگہ تحریری نوٹس بار بار  
 اطلاع دی گئی کہ آپ اپنے سلسلہ چارج شیٹ اپنا تحریری بیان اندر 7 یوم  
 پیش کریں لیکن کنسٹیبل مذکورہ دیدہ دانستہ طور پر جواب پیش کرنے  
 سے قاصر ہے۔ اور تاحال چارج شیٹ وصول نہ کر سکا۔

مذکورہ کنسٹیبل کے متعلق خفیہ طور پر پتہ براری کی گئی جو معلوم ہوا  
 کہ کنسٹیبل مذکورہ جان بوجھ کر ٹریننگ سنٹر نہیں گیا اور افسران بالا  
 کے جائز حکم کی تعمیل نہیں کی اور تاحال اس سلسلے میں کوئی وجوہات  
 پیش نہ کر سکا۔ جو کہ پولیس رولز کی واضح خلاف ورزی ہے۔۔۔

مذکورہ کانسٹیبل کو قصور وار جان کر میجرینیشیمنٹ سزا کی سفارش کی  
 جاتی ہے اور مزید حکم آنجناب افضل ہوگا۔

ایس پی انویسٹیگیشن

ساؤتھ وزیرستان

بایب - SP/INV SWTD

تقریباً ۱۰۰۰ نفر در این مکان در واقع

برای آن استیشن در این زمین

این مکان در این زمین در واقع استیشن و تجهیزات که در این زمین قرار دارد  
که برای آن در این مکان در واقع SP/INV می باشد و در این زمین در واقع  
تجهیزات آن در این زمین در واقع استیشن و تجهیزات که در این زمین قرار دارد  
در این زمین در واقع استیشن و تجهیزات که در این زمین قرار دارد

- 16 - FC. شماره 2867
- 17 - " " شماره 3373
- 18 - " " شماره 3105
- 19 - " " شماره 3054
- 20 - " " شماره 2849
- 21 - " " شماره 2764
- 22 - " " شماره 2812
- 23 - " " شماره 3424
- 24 - " " شماره 4295
- 1 - " " شماره 304
- 2 - " " شماره 2114
- 3 - " " شماره 2035
- 4 - " " شماره 1957
- 5 - " " شماره 1936
- 6 - " " شماره 1865
- 7 - " " شماره 1648
- 8 - " " شماره 1705
- 9 - " " شماره 2131
- 10 - " " شماره 2705
- 11 - " " شماره 2015
- 12 - " " شماره 2039
- 13 - " " شماره 2814
- 14 - " " شماره 2154
- 15 - " " شماره 4424

SP/INV - SWTD  
14-03-93

روش: هم‌زمان از طریق PTS نکس در سوراخ در مقادیر



منجانب - SWTD SP/INV

بنام - کنٹرول روم ٹانک  
برائے آن اسٹیشن پولیس لائنز

ذیل ملازمان کو بذریعہ متعلقہ اسٹیشن مطلع کریں کہ وہ اپنی اپنی چارج شیٹ کی کاپی آفس ٹانک نزد ریڈر SP/INV صاحب سے وصول کریں اور جواب چارج شیٹ اندر 7 یوم دفتر ہذا کو پیش ہوئیں بصورت دیگر آپ کے خلاف محکمانہ انکوائری عمل میں لائی جائے گی۔

2867 FC (16) محمد خالد	(1) ایم فرمان اللہ 3804
3378 FC (17) محمد امین خان	(2) سرور خان 2114
3105 FC (18) تاج محمد	(3) عمیر خان 2035
3054 FC (19) محمد جنید	(4) علاؤ الدین 1957
2809 FC (20) آیاز خان	(5) محمد دین 1936
2764 FC (21) امیر اللہ	(6) رحیم داد 1865
2812 (22) ضیاء الرحمن	(7) صدام حسین 1648
3484 (23) عمر حیات	(8) سید نور 1705
4295 (24) اسامہ	(9) امیر محمد 2131
	(10) غلام رسول 2205
	(11) حبیب خان 2215
	(12) حکیم اللہ 2639
	(13) امیر نواز 2814
SP/INV-SWTD	(14) آدم شاہ 2954
14/03/2023	(15) حضرت عثمان 4424

(نوٹ) جملہ ملازمان / ٹرویز PTS شاخس و سوات سے غیر حاضر ہیں

243

3

12

Letter No. 10367

Date 18-09-22

56

Basic Training Not Reported PTS Shakas

Sl	Rank	Name	Belt	Posting	Remarks
1	FC	Muhammad Amjed ✓	377	Under Training PTS Shahkas 02 Month Basic	Not Reported
2	FC	Sher Ullah ✓	491	Under Training PTS Shahkas 03 Month Basic	Not Reported
3	HC	Muhammad Irfan ✓	1073	Under Training PTS Shahkas 03 Month Basic	Not Reported
4	B1	Said Umar ✓	1163	Under Training PTS Shahkas 05 Month Basic	Not Reported
5	B1	Shah Mehmood ✓	1209	Under Training PTS Shahkas 03 Month Basic	Not Reported
6	FC	Kaleem Ullah Masood ✓	1617	Under Training PTS Shahkas 03 Month Basic	Not Reported
7	FC	Pir Afzal ✓	1986	Under Training PTS Shahkas 03 Month Basic	Not Reported
8	FC	Abdur Rehman ✓	2437	Under Training PTS Shahkas 03 Month Basic	Not Reported
9	FC	Noor Ud Din ✓	2503	Under Training PTS Shahkas 03 Month Basic	Not Reported
10	FC	Muhammad Saleem ✓	2522	Under Training PTS Shahkas 03 Month Basic	Not Reported
11	FC	Ahmad Shaheen ✓	2546	Under Training PTS Shahkas 03 Month Basic	Not Reported
12	FC	Muhammad Sajjad ✓	2838	Under Training PTS Shahkas 03 Month Basic	Not Reported
13	IC	Itaboo Khan	3151	Under Training PTS Shahkas 03 Month Basic	Not Reported
14	FC	Noor Kalum Khan	3224	Under Training PTS Shahkas 03 Month Basic	Not Reported
15	FC	Qareeb Ullah	3242	Under Training PTS Shahkas 03 Month Basic	Not Reported
16	FC	Naqib U Rehman	3263	Under Training PTS Shahkas 03 Month Basic	Not Reported
17	FC	Nizam Ud Din	3279	Under Training PTS Shahkas 03 Month Basic	Not Reported
18	FC	Waheed Ullah	3346	Under Training PTS Shahkas 03 Month Basic	Not Reported
19	FC	Raheel Khan	3360	Under Training PTS Shahkas 03 Month Basic	Not Reported
20	FC	Muhammad Umar	3395	Under Training PTS Shahkas 03 Month Basic	Not Reported
21	FC	Arif Nawaz	3421	Under Training PTS Shahkas 03 Month Basic	Not Reported
22	FC	Taj Muhammad	3480	Under Training PTS Shahkas 03 Month Basic	Not Reported
23	FC	Mohsin Shah Masood	3493	Under Training PTS Shahkas 03 Month Basic	Not Reported
24	FC	Muhammad Wasim	3731	Under Training PTS Shahkas 03 Month Basic	Not Reported
25	FC	Arbab Khan	3792	Under Training PTS Shahkas 03 Month Basic	Not Reported
26	FC	Farman Ullah	3804	Under Training PTS Shahkas 03 Month Basic	Not Reported
27	FC	Nadim Qasmi	3851	Under Training PTS Shahkas 03 Month Basic	Not Reported
28	FC	Shams Ud Din	3860	Under Training PTS Shahkas 03 Month Basic	Not Reported
29	B1	Abbas Khan	3933	Under Training PTS Shahkas 03 Month Basic	Not Reported
30	B1	Gul Rehman	3935	Under Training PTS Shahkas 03 Month Basic	Not Reported
31	B1	Khawaza Khan	3938	Under Training PTS Shahkas 03 Month Basic	Not Reported
32	FC	Shah Faisal	3991	Under Training PTS Shahkas 03 Month Basic	Not Reported
33	FC	Niaz Muhammad	4012	Under Training PTS Shahkas 03 Month Basic	Not Reported
34	FC	Altab Ahmad	4013	Under Training PTS Shahkas 03 Month Basic	Not Reported
35	FC	Zain Ullah	4014	Under Training PTS Shahkas 03 Month Basic	Not Reported
36	FC	Gul Muhammad	4021	Under Training PTS Shahkas 03 Month Basic	Not Reported
37	FC	Irshad Ullah Khan ✓	4033	Under Training PTS Shahkas 03 Month Basic	Not Reported
38	FC	Ajmal	4035	Under Training PTS Shahkas 03 Month Basic	Not Reported
39	FC	Sabbir Rehman	4038	Under Training PTS Shahkas 03 Month Basic	Not Reported
40	FC	Muhammad Ashiq	4043	Under Training PTS Shahkas 03 Month Basic	Not Reported
41	FC	Muhammad Sulernan	4052	Under Training PTS Shahkas 03 Month Basic	Not Reported
42	FC	Hayat Ullah	4097	Under Training PTS Shahkas 03 Month Basic	Not Reported
43	FC	Rehmat Ullah	4115	Under Training PTS Shahkas 03 Month Basic	Not Reported
44	FC	Allah Noor	4121	Under Training PTS Shahkas 03 Month Basic	Not Reported
45	FC	Relmatullah	4143	Under Training PTS Shahkas 03 Month Basic	Not Reported
46	FC	Muhammad Shair Khan	4224	Under Training PTS Shahkas 03 Month Basic	Not Reported
47	FC	Abdul Majeed ✓	4331	Under Training PTS Shahkas 03 Month Basic	Not Reported
48	FC	Israr Ullah	4345	Under Training PTS Shahkas 03 Month Basic	Not Reported
49	FC	Azad Noor	4362	Under Training PTS Shahkas 03 Month Basic	Not Reported
50	FC	Hayat Ullah	4371	Under Training PTS Shahkas 03 Month Basic	Not Reported
51	FC	Hazrat Ullah	4377	Under Training PTS Shahkas 03 Month Basic	Not Reported
52	HC	Gulam Rasool	4473	Under Training PTS Shahkas 03 Month Basic	Not Reported
53	FC	Afsar Khan	4484	Under Training PTS Shahkas 03 Month Basic	Not Reported
54	FC	Said Khan	4487	Under Training PTS Shahkas 03 Month Basic	Not Reported
55	FC	Saeed Ullah	4497	Under Training PTS Shahkas 03 Month Basic	Not Reported
56	FC	Aqal Zaman	4502	Under Training PTS Shahkas 03 Month Basic	Not Reported
57	FC	Gulam Shah	4510	Under Training PTS Shahkas 03 Month Basic	Not Reported
58	FC	Refat Ullah	4512	Under Training PTS Shahkas 03 Month Basic	Not Reported

ذات 18 ستمبر 2022ء کو پیش کی گئی اس کی کاپی اس کے ساتھ ہے۔

Issue charge sheet

[Signature]

DPO/MSD  
2872

366-9055446

**BETTER COPY OF THE PAGE NO. 12**

**Basic Training Not Reported PTS Shakas**

S#	Rank	Name	Belt	Posting	Remarks
1	FC	Muhammad Amjad	377	Under Training PTS Shahkas 03 Months Basic	Not Reported
2	FC	Sher Ullah	491	Under Training PTS Shahkas 03 Months Basic	Not Reported
3	HC	Muhamad Irfan	1073	Under Training PTS Shahkas 03 Months Basic	Not Reported
4	B1	Said Umar	1163	Under Training PTS Shahkas 03 Months Basic	Not Reported
5	B1	Shah Mehmood	1209	Under Training PTS Shahkas 03 Months Basic	Not Reported
6	FC	Kaleem Ullah Masood	1617	Under Training PTS Shahkas 03 Months Basic	Not Reported
7	FC	Pir Afzal	1986	Under Training PTS Shahkas 03 Months Basic	Not Reported
8	FC	Abdur Rehman	2437	Under Training PTS Shahkas 03 Months Basic	Not Reported
9	FC	Noor Ud Din	2503	Under Training PTS Shahkas 03 Months Basic	Not Reported
10	FC	Muhammad Saleem	2522	Under Training PTS Shahkas 03 Months Basic	Not Reported
11	FC	Ahmad Shaheen	2546	Under Training PTS Shahkas 03 Months Basic	Not Reported
12	FC	Muhammad Sajjad	2838	Under Training PTS Shahkas 03 Months Basic	Not Reported
13	FC	Rabooob Khan	3151	Under Training PTS Shahkas 03 Months Basic	Not Reported
14	FC	Noor Kalam Khan	3224	Under Training PTS Shahkas 03 Months Basic	Not Reported
15	FC	Qareeb Ullah	3242	Under Training PTS Shahkas 03 Months Basic	Not Reported
16	FC	Naqib U Rehman	3263	Under Training PTS Shahkas 03 Months Basic	Not Reported
17	FC	Nizam Ud Din	3279	Under Training PTS Shahkas 03 Months Basic	Not Reported
18	FC	Waheed Ullah	3346	Under Training PTS Shahkas 03 Months Basic	Not Reported
19	FC	Raheel Khan	3360	Under Training PTS Shahkas 03 Months Basic	Not Reported
20	FC	Muhammad Umar	3395	Under Training PTS Shahkas 03 Months Basic	Not Reported
21	FC	Arif Nawaz	3421	Under Training PTS Shahkas 03 Months Basic	Not Reported
22	FC	Taj Muhammad	3480	Under Training PTS Shahkas 03 Months Basic	Not Reported
23	FC	Mohsin Shah Masood	3493	Under Training PTS Shahkas 03 Months Basic	Not Reported
24	FC	Muhammad Wasim	3731	Under Training PTS Shahkas 03 Months Basic	Not Reported
25	FC	Arbab Khan	3792	Under Training PTS Shahkas 03 Months Basic	Not Reported
26	FC	Farman Ullah	3804	Under Training PTS Shahkas 03 Months Basic	Not Reported
27	FC	Nadim Qasmi	3851	Under Training PTS Shahkas 03 Months Basic	Not Reported
28	FC	Shams Ud Din	3860	Under Training PTS Shahkas 03 Months Basic	Not Reported
29	B1	Abbas Khan	3999	Under Training PTS Shahkas 03 Months Basic	Not Reported
30	B1	Gul Rehman	3935	Under Training PTS Shahkas 03 Months Basic	Not Reported
31	B1	Khawaza Khan	3938	Under Training PTS Shahkas 03 Months Basic	Not Reported
32	FC	Shah Faisal	3991	Under Training PTS Shahkas 03 Months Basic	Not Reported
33	FC	Niaz Muhammad	4012	Under Training PTS Shahkas 03 Months Basic	Not Reported
34	FC	Aftab Ahmad	4013	Under Training PTS Shahkas 03 Months Basic	Not Reported
35	FC	Zain Ullah	4014	Under Training PTS Shahkas 03 Months Basic	Not Reported
36	FC	Gul Muhammad	4021	Under Training PTS Shahkas 03 Months Basic	Not Reported
37	FC	Irshad Ullah Khan	4033	Under Training PTS Shahkas 03 Months Basic	Not Reported
38	FC	Amjal	4035	Under Training PTS Shahkas 03 Months Basic	Not Reported
39	FC	Sabbir Rehman	4038	Under Training PTS Shahkas 03 Months Basic	Not Reported
40	FC	Muhammad Ashiq	4043	Under Training PTS Shahkas 03 Months Basic	Not Reported
41	FC	Muhammad Suleman	4052	Under Training PTS Shahkas 03 Months Basic	Not Reported
42	FC	Hayat Ullah	4097	Under Training PTS Shahkas 03 Months Basic	Not Reported
43	FC	Rehmat Ullah	5115	Under Training PTS Shahkas 03 Months Basic	Not Reported
44	FC	Allah Noor	4121	Under Training PTS Shahkas 03 Months Basic	Not Reported
45	FC	Rehmatullah	4143	Under Training PTS Shahkas 03 Months Basic	Not Reported
46	FC	Muhammad Sabir Khan	4224	Under Training PTS Shahkas 03 Months Basic	Not Reported
47	FC	Abdul Majeed	4331	Under Training PTS Shahkas 03 Months Basic	Not Reported
48	FC	Israr Ullah	4345	Under Training PTS Shahkas 03 Months Basic	Not Reported
49	FC	Asad Noor	4362	Under Training PTS Shahkas 03 Months Basic	Not Reported
50	FC	Hayat Ullah	4371	Under Training PTS Shahkas 03 Months Basic	Not Reported
51	FC	Hazrat Ullah	4377	Under Training PTS Shahkas 03 Months Basic	Not Reported
52	HC	Gulam Rasool	4473	Under Training PTS Shahkas 03 Months Basic	Not Reported
53	FC	Afsar Khan	4484	Under Training PTS Shahkas 03 Months Basic	Not Reported
54	FC	Said Khan	4487	Under Training PTS Shahkas 03 Months Basic	Not Reported
55	FC	Saeed Ullah	4497	Under Training PTS Shahkas 03 Months Basic	Not Reported
56	FC	Aqal Zaman	4502	Under Training PTS Shahkas 03 Months Basic	Not Reported
57	FC	Gulami Shah	4510	Under Training PTS Shahkas 03 Months Basic	Not Reported
58	FC	Refat Ullah	4512	Under Training PTS Shahkas 03 Months Basic	Not Reported

(نوٹ) چارج شیٹ SP/INV نمبر 4 ایک آفس سے وصول کریں اور رپورٹ ایماں 7 یوم میں ریڈر SP/INV کو پیش کریں

Issue Charge Sheet

دستخط امیر ذی

DPO/SWB

Date: 20/6/2020

Letter No


Batch # II  
Cycle # IV

13

Basic Recruit Training PTS Swat Not Reported w.e From 10-06-2022 To 20-09-2022

Sl. No.	Rank	Name	Bo No.	Current Post	Training	Training Status
1	B1	Saddam Hussain	1647	PTS Sawal 3 Month Ba	Training	Not Reported
2	B1	Said Noor	1705	PTS Sawal 3 Month Ba	Training	Not Reported
3	cc	Muhammad Abbas	1836	PTS Sawal 3 Month Ba	Training	Not Reported
4	FC	Rahim Daa	1865	PTS Sawal 3 Month Ba	Training	Not Reported
5	FC	Muhammad Din	1936	PTS Sawal 3 Month Ba	Training	Not Reported
6	FC	Ali Ud Din	1957	PTS Sawal 3 Month Ba	Training	Not Reported
7	FC	Umair Khan	2035	PTS Sawal 3 Month Ba	Training	Not Reported
8	FC	Sarwar	2114	PTS Sawal 3 Month Ba	Training	Not Reported
9	FC	Amir Muhammad	2131	PTS Sawal 3 Month Ba	Training	Not Reported
10	FC	Ghulam Rasool	2205	PTS Sawal 3 Month Ba	Training	Not Reported
11	FC	Habib Jan	2215	PTS Sawal 3 Month Ba	Training	Not Reported
12	FC	Hakim Ullah	2639	PTS Sawal 3 Month Ba	Training	Not Reported
13	FC	Amir Ullah	2764	PTS Sawal 3 Month Ba	Training	Not Reported
14	FC	Ayaz Shah	2809	PTS Sawal 3 Month Ba	Training	Not Reported
15	FC	Ali U Rehman	2817	PTS Sawal 3 Month Ba	Training	Not Reported
16	FC	Amir Nawaz	2814	PTS Sawal 3 Month Ba	Training	Not Reported
17	FC	Muhammad Khalid	2817	PTS Sawal 3 Month Ba	Training	Not Reported
18	FC	Adnan Shah	2954	PTS Sawal 3 Month Ba	Training	Not Reported
19	FC	Muhammad Junaid	3054	PTS Sawal 3 Month Ba	Training	Not Reported
20	FC	Taj Muhammad	3105	PTS Sawal 3 Month Ba	Training	Not Reported
21	FC	Muhammad Amin Jan	3378	PTS Sawal 3 Month Ba	Training	Not Reported
22	FC	Hazrat Usman	4424	PTS Sawal 3 Month Ba	Training	Not Reported

رپورٹ کے حوالہ سے انہیں بطور سبب رپورٹنگ کے لئے سہولت دینے کے لئے اندرون کیمپ  
انہیں گریڈ خراب کرنے کے لئے سہولت دینے کے لئے اندرون کیمپ

  
DPO/SH/10

**BETTER COPY OF THE PAGE NO. 13**

Basic Recruit Tanning PTS Swat Not Reported w.e.From 20-06-2022 to 20-09-2022

S#	Rank	Name	Belt	Posting	Remarks
1	B1	Saddam Hussain	1648	Under Training PTS Shahkas 03 Months Basic	Not Reported
2	B1	Said Noor	1705	Under Training PTS Shahkas 03 Months Basic	Not Reported
3	FC	Muhammad Abbas	1836	Under Training PTS Shahkas 03 Months Basic	Not Reported
4	FC	Rahim Dad	1865	Under Training PTS Shahkas 03 Months Basic	Not Reported
5	FC	Muhammad Din	1936	Under Training PTS Shahkas 03 Months Basic	Not Reported
6	FC	Atta Ud Din	1957	Under Training PTS Shahkas 03 Months Basic	Not Reported
7	FC	Umaid Khan	2035	Under Training PTS Shahkas 03 Months Basic	Not Reported
8	FC	Sarwar	2114	Under Training PTS Shahkas 03 Months Basic	Not Reported
9	FC	Amir Muhammad	2131	Under Training PTS Shahkas 03 Months Basic	Not Reported
10	FC	Ghulam Rasool	2205	Under Training PTS Shahkas 03 Months Basic	Not Reported
11	FC	Habib Jan	2215	Under Training PTS Shahkas 03 Months Basic	Not Reported
12	FC	Hakim Ullah	2639	Under Training PTS Shahkas 03 Months Basic	Not Reported
13	FC	Amir Ullah	2764	Under Training PTS Shahkas 03 Months Basic	Not Reported
14	FC	Ayaz Khan	2809	Under Training PTS Shahkas 03 Months Basic	Not Reported
15	FC	Zia u Rehman	2812	Under Training PTS Shahkas 03 Months Basic	Not Reported
16	FC	Amir Nawaz	2814	Under Training PTS Shahkas 03 Months Basic	Not Reported
17	FC	Muhammad Khalid	2867	Under Training PTS Shahkas 03 Months Basic	Not Reported
18	FC	Adam Shah	2954	Under Training PTS Shahkas 03 Months Basic	Not Reported
19	FC	Muhamad Junaid	3054	Under Training PTS Shahkas 03 Months Basic	Not Reported
20	FC	Taj Muhammad	3105	Under Training PTS Shahkas 03 Months Basic	Not Reported
21	FC	Muhammad Amin Jan	3378	Under Training PTS Shahkas 03 Months Basic	Not Reported
22	FC	Hazrat Usman	4424	Under Training PTS Shahkas 03 Months Basic	Not Reported

(نوٹ) جملہ ملازمان اپنی اپنی چارج شیٹ ریڈر SP/INV ٹائیک آفس سے وصول کر کے اندر 7 یوم اپنا تحریری جواب پیش کر کے آفس حاضر آویں ضرورت ہے۔

دستخط انگریزی

DPO SWTD



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
SOUTH WAZIRISTAN TRIBAL DISTRICT.

No. 893 / 1 Dated SWTD the 19.1.2023

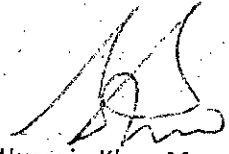
**OFFICE ORDER**

My order will dispose of departmental enquiry against Constable Muhammad Sher Khan No.4224 this District Police SWTD on the allegation that you were selected for training at PTS Shakas vides this office letter No. 10367 dated, 18-09-2022. But he badly failed to report at training Centre will in time. For which he was properly charge Sheeted. The Fazal - F Subhan SP Investigation unit SWTD was nominated as inquiry officer. The enquiry was conducted the alleged official did not join the departmental enquiry intentionally. Subsequently, the enquiry officer has submitted finding report starting therein that during enquiry all possible resources are utilized to ensure the joining for Personnel hearing of alleged official but he failed to appear before me. The enquiry Officer recommended for Major punishment against the said official.

After the perusal finding report, and other relevant materials placed before me, I,

MR, SHBIR HUSSAIN KHAN MARWAT DISTRICT POLICE OFFICER, SWTD being competent Authority vested in me under Khyber Pakhtunkhwa Police Rules 1975 amended 2014 hereby awards to Major Punishment of Dismissal From Service to the defaulter Constable Muhammad Sher Khan No.4224 with immediate effect.

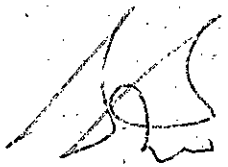
Order announced

  
(Shabir Hussein Khan Marwat)  
District Police Officer  
SWTD

Copy 894 / 7-9-6

Copy of above is submitted to the:-

1. The Regional Police officer, Dera Ismail Khan Region.
2. All Concerned.

  
(Shabir Hussein Khan Marwat)  
District Police Officer  
SWTD

بھندہ دست جناب انسپکٹر جنرل آف پولیس، خیبر پختونخواہ، پشاور

درخواست بمسرد انصاف دلانے مسائل کو واپس بحال کرنے اور

انصاف دینے کیونکہ مسائل پر حسب بیماری عملات کے جو کہ سال 2015 تا

20 دن ہسپتال میں گزارے۔

جناب عالی!

مسائل حسب ذیل عرض رسال ہے:

1. یہ کہ مسائل کا نشیل محمد شایر خان نمبر 4224 ولد سالک خان ساکن بیرون گنج بیٹ پھندہ روڈ محلہ شیخ آباد نمبر 3، پشاور موجودہ پتہ ڈاک خانہ مکین، چلاری شیک خیل، تحصیل مکین، ضلع ساڈتھ وزیرستان کا ہوں۔ (نقل شاختی کارڈ لف درخواست ہر ہے۔)

2. یہ کہ مسائل کو PTS ٹرننگ شاہ کس کے لئے نامزد کیا گیا تھا لیکن یہ وجوہات بیماری اور علالت (بواسیر) کے مسائل کا نشیل مذکورہ ٹرننگ کے لئے نہ جاسکا۔ اور مسائل نے اس کا علاج و معالجہ (آپریشن) اور اس کے لئے بھی مسائل نے کسی سے ادھار رقم لے کر اپنا آپریشن کیا جو کہ ہسپتال کے ڈاکٹر صاحب نے سال 2015 تا 20 دن کی چھٹی کے بارے میں بھی بتایا کہ گھر پر آرام کرو تا کہ آپ کی بیماری ٹھیک ہو سکے۔ (نقل آپریشن، ہسپتال رسیدات لف درخواست ہذا میں)۔

3. یہ کہ مسائل کا نشیل کو مورخہ 19/04/2023 کو جناب ڈی پی او صاحب، ساڈتھ وزیرستان ڈسٹرکٹ ٹرائبل نے مسائل کو ڈیوٹی سے برخاست کیا ہے جو کہ مسائل اس کا تحمل نہ ہے۔ (نقل لف درخواست ہذا میں)۔

4. یہ کہ مسائل نے اس بابت بہت کوششیں کیں لیکن تاحال کوئی عمل در آمد نہ ہو سکا۔ اور مسائل کی کوئی شنوائی نہ ہو سکی۔

5. یہ کہ مسائل ایک غریب اور اپنے کنبے کا واحد کفیل ہے جو کہ مسائل بہت ہی مشکل سے اپنے کنبے کی پرورش کرتا ہے اور یہی واحد ذریعہ معاش ہے۔

لہذا استدعا کی جاتی ہے کہ بمستطور درخواست ہذا مسائل کی داد رسی کی جائے اور مسائل کا نشیل محمد شایر خان

نمبر 4224 کو واپس اپنی جگہ پر بحال کیا جائے تاکہ مسائل اس کے ذریعے سے اپنے کنبے کی کفالت کر سکے۔

تہذیب اور داد رسی جو قرین انصاف ہو مرحمت فرمائی جائے۔

المرقوم:

العبد:

مسائل کا نشیل محمد شایر خان نمبر 4224

شناختی کارڈ نمبر: 7-9214044-21703

رابط نمبر: 9399973-0311

ATTESTED



OFFICE OF THE  
REGIONAL POLICE OFFICER  
DERA ISMAIL KHAN  
REGION

☎ 0966-9280291 Fax # 9280290  
dated D.I.Khan the

No. 5224 /ES  
ORDER

19/10/2023

1. This order disposes off departmental appeal filed by Ex-Constable Muhammad Sher No. 4224 of District Police SWTD has passed against the order of Major Punishment of (Dismissal from Service) by the DPO SWTD vide his office Order No. 893 dated 19.04.2023 on the following allegations:


- 2. "He was selected for training at PTS. Shukas vides this office letter No 10367 dated 18.09.2022, but he badly failed to report at training Center will in time.  
"He was absent from duty without prior permission/approval from the high ups".
- ii. DPO SWTD served the appellant with the charge sheet. Enquiry into the matter was got conducted into through Mr. Fazal Subhan SP Investigation SWTD who in his finding report, stated that all possible resources were utilized to ensure the joining for personal hearing but he failed to appear before him. The inquiry officer has recommended for Major Punishment.

3. Hence, the appellant was awarded Major Punishment of "Dismissal from Service" by the DPO SWTD vide his office Order No. 893 dated 19.04.2023.

4. Perusal of the service record of the applicant and comments received from DPO SW Upper the instant appeal is time barred.


5. Keeping in view the above, I, **NASIR MEHMOOD SATTI, PSP**, Regional Police Officer, Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11, clause-4 (a), of the Police Rules 1975, do not intend to take a lenient view, therefore **REJECT** his appeal being time barred and uphold the order of Major Punishment of "Dismissal from Service" passed by District Police Officer SWTD vide Order No. 893 dated 19.04.2023.

6. Order Announce

  
(NASIR MEHMOOD SATTI)PSP  
Regional Police Officer  
Dera Ismail Khan

No. 8225 /ES,

Copy of above is sent to the DPO SW Upper with reference to his office letter No. 1532/ES dated 04.09.2023, (Encl: Service Roll & Fauji Missal).

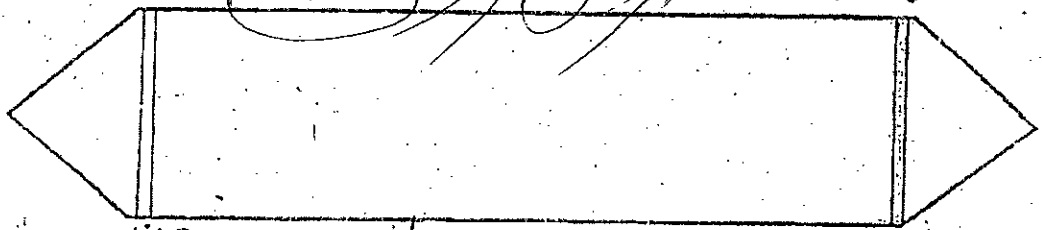
  
(NASIR MEHMOOD SATTI)PSP  
Regional Police Officer  
Dera Ismail Khan  
17/10

192-16/22 ✓

192-16/23



# بعدالت عرض پر سوال کے صفحہ



2 بجانب  
پتہ نام

صبر حال

موزخہ  
مقدمہ  
دعویٰ  
پیر

## باعث تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کفایت کاروائی متعلقہ  
 آجین مقام کشمیر کیلئے مقررہ کارروائی کے لئے مقررہ کارروائی کے لئے مقررہ کارروائی کے لئے  
 مقررہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا۔ نیز  
 وکیل صاحب کو راجسی نامہ کرنے سے و تفریق حالت فیصلہ برحلقہ رہے جواب دہی اور اقبال دعویٰ اور  
 باسورت ڈگری کرنے اجراء اور وصولی چیک ورد پیر اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا جیل کی برآمدگی اور منسوخ  
 نیز دائر کرنے سے اپیل نمرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساتھ  
 پر اختیاط منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جات التوائے مقدمہ کے سبب سے ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
 مذکور کریں۔ لہذا نکالت نامہ لکھدیا کہ سند ہے۔

المرقوم 12/23 20

العبد \_\_\_\_\_ واہ العبد

مقام 3 اور

Handwritten signatures and marks at the bottom of the page.

Shahiv