

Sr. No	Date of order/proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	15.03.2018	<p style="text-align: center;"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u> Service Appeal No. 595/2015 Date of Institution ... 28.05.2015 Date of Decision ... 15.03.2018</p> <p>Asif Ex-Sepay, having belt No.5519, R/O Peshawar. <p style="text-align: right;">Appellant</p> <ol style="list-style-type: none"> 1. Capital City Police Officer Peshawar. 2. Senior Superintendent of Police, Hayatabad Peshawar. 3. Deputy Superintendent of Police Headquarter Peshawar. 4. Deputy Superintendent of Police, Headquarter, Peshawar. 5. Superintendent of Police, Rural, Peshawar. <p style="text-align: right;">Respondents</p> <p><u>JUDGMENT</u> <u>MUHAMMAD HAMID MUGHAL, MEMBER:</u> - Learned counsel for the appellant present. Learned Assistant Advocate General for the respondents present.</p> <p>2. The appellant (Ex-Constable) has filed the present appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the respondents and made impugned the order dated 06.02.2015 awarding major penalty of dismissal from service to the appellant and order dated 29.04.2015 rejecting the departmental appeal of the appellant.</p> <p>3. Learned Counsel for the appellant argued that the impugned orders are against law and facts. Further argued that the appellant was dismissed from service without observing codal formalities and legal requirements. Further argued that the impugned orders are</p> </p>

D. Khan

excessive/harsh as the appellant could not attend to his duties due to severe illness. Further argued that the appellant has mentioned the plea of his severe illness in reply to the Show Cause Notice as well as in his departmental appeal.

4. As against that Learned Assistant Advocate General resisted the present appeal and argued that the appellant ~~was~~ remained willfully absent from his duties without any application and permission, hence the impugned orders were rightly passed by adhering to legal requirements.

5. Arguments heard. File perused.

6. From perusal of record and arguments of the parties it transpired that disciplinary action was initiated against the appellant, inquiry was conducted and Show Cause Notice was also issued to the appellant as such learned counsel for the appellant remained unable to substantiate his plea that the impugned orders were issued without observing legal requirements. However the appellant has taken the plea that he could not attend to his duties being severely ill and he also mentioned this fact not only in the present service appeal but also in his reply to Show Cause Notice as well as in the departmental appeal. The appellant has also submitted copies of documents regarding his medical treatment in the hospital. In this back drop the punishment of dismissal from service appears to be harsh one.

7. Consequently the present appeal is accepted in terms that the major punishment of dismissal from service is modified and

Dismissal

converted to withholding of two (02) annual increments for a period of three (03) years. Absence period and intervening period shall be treated as leave without pay. Parties are left to bear their own costs.

File be consigned to the record room.

ANNOUNCED

15.03.2018



(MUHAMMAD AMIN KUNDI)
MEMBER



(MUHAMMAD HAMID MUGHAL)
MEMBER

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR

N.W.F. Province
Service Tribunal

Diary No. 605
Dated 28-5-2015

Service Appeal No 595 /2015

Asif Ex-Sepay, having belt No. 5519, R/o Peshawar
.....Appellant

VERSUS

1. Capital ^{City} Police Officer Peshawar.
 2. Senior Superintendent of Police, Hayatabad Peshawar
 3. Superintendent of Police Head quarter Peshawar
 4. Deputy Superintendent of Police, Headquarter Peshawar.
 5. Superintendent of Police, Rural, Peshawar.
-Respondents

APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT-
1974 FOR SETTING ASIDE THE IMPUGNED
ORDER DATED 29-04-2015 OF THE LEANED
RESPONDENT NO.1 WHEREBY
DEPARTMENTAL APPEAL OF THE
APPELLANT WAS DISMISSED IN A CURSORY
MANNER.

Respectfully Sheweth,

1. That the Appellant is a naturally born citizen of the Islamic Republic of Pakistan and hails from District Peshawar.
2. That the petitioner was inducted into police force of Khyber Pakhtunkhwa & was given belt No. 5519.

Filed to-day

Registrar
25/5/15

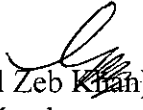
Re-submitted to-day


and filed

Registrar
03/08/2015

15.01.2018

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


(Gul Zeb Khan)
Member

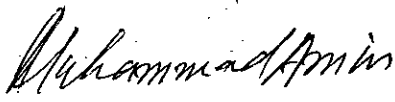

(M. Hamid Mughal)
Member

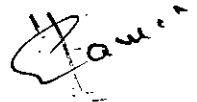
15.03.2018

Learned counsel for the appellant present. Learned Deputy
District Attorney for the respondents present. Vide separate
judgment of today of this Tribunal placed on file, the present appeal
is accepted in terms that the major punishment of dismissal from
service is modified and converted to withholding of two (02) annual
increments for a period of three (03) years. Absence period and
intervening period shall be treated as leave without pay. Parties are
left to bear their own costs. File be consigned to the record room.

ANNOUNCED

15.03.2018


(MUHAMMAD AMIN KUNDI)
MEMBER


(MUHAMMAD HAMID MUGHAL)
MEMBER

25.04.2017


Agent to counsel for the appellant and Mr. Ziaullah, Government Pleader for the respondents present. Agent to counsel for the appellant seeks adjournment as counsel for the appellant is not available today. Adjourned for final hearing to 08.08.2017 before D.B.

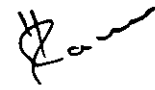

Member


Chairman

08.08.2017

Appellant in person present. Mr. Ziaullah, Deputy District Attorney for the respondents present. Arguments could not be heard as lawyer community is on general strike. Adjourned. To come up for arguments on 30.10.2017 before D.B.

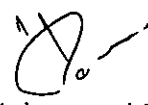

(Muhammad Amin Khan Kundi)
Member (J)


(Muhammad Hamid Mughal)
Member (J)

30.10.2017

Appellant with counsel present. Mr. Zia Ullah, Deputy District Attorney for the respondents present. Appellant with counsel seeks adjournment. Adjourn. To come up for arguments on 15.01.2018 before D.B.


(Gul Zeb Khan)
Member (E)


(Muhammad Hamid Mughal)
Member (J)


10.02.2016


Agent of counsel for the appellant and Mr. Aziz Shah, Reader
alongwith Addl: A.G for respondents present. Written statement
submitted. The appeal is assigned to D.B for rejoinder and final
hearing for 26.5.2016.


Chairman

26.5.2016

Counsel for the appellant and AAG for respondents
present. Rejoinder submitted copy which is placed on file to
come up for arguments to 27.10.2016.


Member


Member

27.10.2016

Appellant in person and Mr. Muhammad Jan, GP
for respondents present. Appellant requested for
adjournment as his counsel was busy before the Peshawar
High Court Peshawar. To come up for arguments on
07.02.2017.


(PIR BAKHSH SHAH)
MEMBER


(ABDUL LATIF)
MEMBER

07.02.2017

Counsel for the appellant and Mr. Ziaullah, GP for
respondents present. Counsel for the appellant requested for
adjournment. Request accepted. To come up for arguments on
25.04.2017.


(ASHFAQUE TAJ)
MEMBER


(MUHAMMAD AAMIR NAZIR)
MEMBER

03. 09.06.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Sepay in Police and vide impugned order dated 06.02.2015 he was dismissed from service on the allegations of wilful absence regarding which he preferred departmental appeal on 18.02.2015 which was rejected on 29.04.2015 and hence the instant service appeal on 03.06.2015.

That the appellant was afforded no opportunity of hearing nor the enquiry was conducted in the prescribed manners.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 01.09.2015 before S.B.

Appellant Deposited
Security & Process Fee



71-2-10

Chairman

4 01.09.2015

Appellant in person and Mr. Hayat Muhammad, Reader to DSP alongwith Assistant A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 12.11.2015 before S.B.

Chairman

12.11.2015



Appellant in person and Mr. Hayat Muhammad, Reader to DSP alongwith Addl: A.G for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 10.2.2016 before S.B.

Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 595/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	03.06.2015	<p style="text-align: center;">The appeal of Mr. Asif ex-Sepoy resubmitted today by Mr. Javed Iqbal Gulbela Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	5-6-15	<p style="text-align: center;">This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>9-6-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Asif Ex-Sepoy having Belt No. 5519 r/o Peshawar received to-day i.e. on 28.05.2015 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexure-B of the appeal is illegible which may be replaced by legible/better one.
- 2- The authority whose order is challenged has not been arrayed/made a necessary party.
- 3- Copy of order dated 3.3.2015 mentioned in the index of the appeal at serial no. 4 is not attached with the appeal which may be placed on it.

No. 819 /S.T,

Dt. 28/5 /2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Javed Iqbal Gulbehla Adv.

Respected Sir,
Resubmitted after necessary
completion.



03/06/2015

Note: In fact the impugned order
of Appellate Authority is
29-04-2015, but erroneously
mentioned as 03-03-2015 in
index, which is rectified, please.



03/06/2015

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR

Service Appeal No. 595 /2015

ASIF

VERSUS

~~Case~~ Capital Police Officer Peshawar etc

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Through

Petitioner

Javed Iqbal Gulbela

Advocate High Court

Peshawar

Dated: 28-05-2015

(1)

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR**

Service Appeal No 595 /2015

K.W.F Province
Service Tribunal
Diary No 605
Dated 28-5-2015

Asif Ex-Sepay, having belt No. 5519, R/o Peshawar
.....Appellant

VERSUS

1. ~~City~~ Capital ^{City} Police Officer Peshawar.
2. Senior Superintendent of Police, Hayatabad Peshawar
3. Superintendent of Police Head quarter Peshawar
4. Deputy Superintendent of Police, Headquarter Peshawar.
5. Superintendent of Police, Rural, Peshawar.

.....Respondents

APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT-
1974 FOR SETTING ASIDE THE IMPUGNED
ORDER DATED 29-04-2015 OF THE LEANED
RESPONDENT NO,1 WHEREBY
DEPARTMENTAL APPEAL OF THE
APPELLANT WAS DISMISSED IN A CURSORY
MANNER.

Respectfully Sheweth,

1. That the Appellant is a naturally born citizen of the Islamic Republic of Pakistan and hails from District Peshawar.
2. That the petitioner was inducted into police force of Khyber Pakhtunkhwa & was given belt No. 5519.

Filed to-day
25/5/15

Re-submitted to-day
and filed

03/08/2015

(2)

3. That after getting into the rolls of this prestigious force of the homeland, the appellant was sent for physical training whereupon the appellant proved his mantle and after completing the training tenure, the appellant joined back his station of service and started serving there with utmost zeist and capabilities.
4. That it was while at this juncture that the appellant fell seriously ill and developed severe pain due to incident, which caused the appellant to be confined to bed for many months.
5. That unfortunately the illness remained the same, rather aggravated after few days and the appellant had to remained at home and was ultimately dismissed from service on 06-02-2015. (Copies of final show case notice & impugned dismissed order are annexed herewith as Annexure "A & B" respectively, while medical documents annexed "C").
6. That feeling aggrieved, the appellant preferred an appeal to the Respondent No. 1, but the same was turned down without any rem or reason vide the impugned office order dated 29-04-2015 (Copies of appeal and office order is attached as annexure "D & E", respectively).
7. That feeling aggrieved from dismissal order from service & finding of the learned appellate authority, the appellant prefers the instant appeal for reinstated into service with all back benefits, by setting aside both the impugned orders, upon the following grounds, inter alia.

Grounds:

(3)

- A. That the dismissal order as well as the impugned order of the learned appellant authority are against facts of the case, material available on file & law governing the subject & are therefore illegal, unwarranted & ineffective in the eyes of law.
- B. That there had neither been conducted any proper inquiry, nor the appellant was ever allowed to be heard in person, nor was ever allowed to defend his case.
- C. That even the appeal of the Petitioner was decided in vacuum and without affording any opportunity to the appellant to be heard in person. And thus not only the principles of natural justice was blatantly violated, but rather Section 24-A of the General Clauses Act was ruthlessly chucked out too.
- D. That under the Police Rules of 1975, the disciplinary action and particularly those carrying major punishments, in consequences, must be precedent-ally followed by show cause notice, a proper inquiry and a fair chance of defense, but all have blatantly been violated in the instant case, which is not allowed under the law.
- E. That from all prospective the impugned dismissal order dated 06/02/2015 and office order dated 29-04-2015 are wrong, illegal, void ab-initio, unwarranted and are liable to be set aside.
- F. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

(4)

It is, therefore, respectfully prayed that on acceptance of the instant appeal, the impugned officer order dated 06-02-2015 of the office of the learned respondent No. 3 and impugned office order dated 29-04-2015 of the respondent No. 1 be set aside and the appellant be reinstated into service with all back benefits.

Any other remedy deemed proper and just in the circumstances of the case, may also be extended in favor of appellant.



Appellant

Through



Javed Iqbal Gulbela

Advocate High Court

Peshawar

Dated: 28-05-2015

CERTIFICATE

No appeal on the subject has earlier been filed by the appellant in above noted case before this Hon'ble Tribunal.



Advocate

LAW BOOKS:-

1. Constitution of Islamic Republic of Pakistan
2. Case law according to need.



Advocate

5

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR**

Asif

VERSUS

~~Chief~~ Capital Police Officer Peshawar

AFFIDAVIT

I Asif, Ex- Sepoy Police Department, R/o Peshawar, declare on oath that all the contents of accompanied appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court:

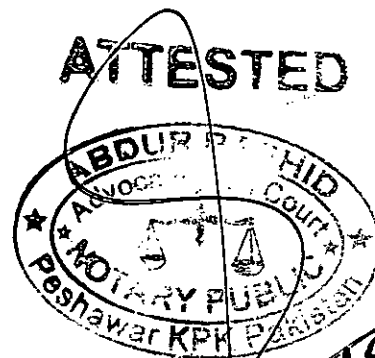
Asif

Deponent

Identified by:

Javed Iqbal Gulbela

JAVED IQBAL GULBELA
Advocate High Court Peshawar



28/5/2015

(6)

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICES
TRIBUNAL PESHAWAR**

Asif

VERSUS

~~Chief~~ Capital Police Officer Peshawar.

ADDRESS OF THE PARTIES

Appellant

Asif, Ex- Sepoy belt No. 5519, Police Department R/o Peshawar

Respondents

1. ~~Chief~~ Capital Police Officer Peshawar.
2. Senior Superintendent of Police, Hayatabad Peshawar
3. Superintendent of Police Head quarter Peshawar
4. Deputy Superintendent of Police, Headquarter Peshawar.
5. Superintendent of Police, Rural Peshawar.

[Handwritten signature]

Petitioner

Through

[Handwritten signature]
Javed Iqbal Gulbela
Advocate High Court
Peshawar

Dated: 28/04/2015

(7)

Ann-A

FINAL SHOW CAUSE NOTICE

I Superintendent of Police, Rural, Capital City Police, Peshawar as competent authority, under the provision of Police Disciplinary Rules 1975 do hereby serve you **FC Asif No. 5519** of Capital City Police, Peshawar as follows.

1 (i) That consequent upon the completion of enquiry conducted against you by the enquiry officer for which you were given opportunity of hearing.

(ii) On going through the findings and recommendation of the enquiry Officer, the material on record and other connected papers produced before the E.O.

I am satisfied that you have committed the following acts/omissions specified in Police Disciplinary Rules 1975 of the said Ordinance.

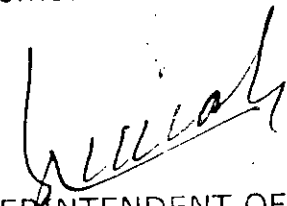
"That you FC Asif No. 5519 while posted at P.S Badaber remained absent from duty w.e.f: 17.11.2013 to 08.08.2014 without taking permission or leave. This act amounts to gross misconduct on your part and against the discipline of the force"

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of major punishment under Police Disciplinary Rules 1975 for absence.

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

4. If no reply to this notice is received within 7 days of its delivery, in normal course of circumstances, it shall, be presumed that you have no defense to put in and in that case as ex-parte action be taken against you.

5. The copy of the finding of the enquiry officer is enclosed.


SUPERINTENDENT OF POLICE,
RURAL, PESHAWAR

No. 5690 /PA, SP Rural: dated Peshawar the 9/12 /2014.

Copy to official concerned

ATTESTED

(8)

کمیٹی چیاب سٹیٹس پولیس رورل ایسٹ اور

8

درخواست

بشکل جواب دہی بایسٹریسٹ
قائل شوماز ٹولس رورل 9/12/2014

کوالیٹر 09/12/2014
NO-5690/PA, SP Rural dated

تیم نمبر 5519 ایس ایس ایف
آخری آئیناتی تماتہ پٹھو پیر ایسٹ اور

چیاب عالیہ! سائل حسب ذیل عرض رتان ہے*

۱۔ یہ کہ سائل ایسے فتنی اور الماندار و پیر وقتینل پولیس اہلکار ہے۔ اور 2006 سے تا حال پولیس فورس میں خدمات انجام دے رہا ہے۔ اور پوری فتن اور جالمنسانی سے خدمات انجام دی ہیں اور کبھی بھی کئی بالائی آفسر یا ذمہ دار کو شکایت کا موقع نہ دیا ہے*
۲۔ یہ کہ سائل صیاب پولیس سٹیشن میں آئیناتی تماتہ اور رورل 17/11/2013 کو سائل کا تبادلہ تماتہ پٹھو پیر ہوا۔ چونکہ سائل ہمارے قلم بد تصویر حاضریمانہ دسکا۔ بد تصویر تماتہ پٹھو پیر غیر حاضر دی۔ سائل نے حتی الامکان علیہ لیا۔ ہر جگہ از جلد صورت یا پورٹوٹو لونی پر حاضر کیا۔ مگر جلد ہی پاتہ ہو گیا*
(سید لیٹل ماعدات حکم ملنے پر رورل لٹا)

۳۔ یہ کہ اب سائل کی پوسٹنگ تماتہ پٹھو پیر ہے۔ میرے ڈیوٹی پولیس لائن میں ہے

چیاب والا! سائل ایسے فرض شناس اہلکار ہے۔ اور جہاں کہیں بھی ڈیوٹی پر موجود جاوے۔ پوری الماندار، دیانتداری اور مکمل ذمہ داری کیساتھ فرض انجام دوتا۔ اور کبھی بھی ایسے بالائی ذمہ داران کو شکایت کا موقع نہ دلتا*
ATTES

کبتہ آسٹہ صاحبہ قائل شوماز ٹولس مذکورہ کو بلا تمبر
کاروائی داخل دفتر کرنے اور سائل پر خصوصی تحقیقات
اور مہربانی فرمانے اور رورل ایسٹ اور رورل ایسٹ
اجازت و حکم صادر فرمایا جاوے*

Amir

الکھڑی

5519 ایس ایس ایف
پولیس لائن ایسٹ اور

(چیاب کی غیر درازی اور پٹھو پیر سائل لکھنے کے بعد)

ORDER.

(5)

Am-B

The office order for disposal of departmental proceedings against Constable Isif No. 5519 on the grounds that he while posted at Police Station Badaber absented himself from his lawful duty with effect from: 17.11.2013 to 08.08.2014 without leave or permission.

Departmental proceedings were initiated against him and SDPO Chamkani Circle was appointed as enquiry officer who vide his findings submitted that the alleged Constable was telephonically summoned time and again on his mobile phone numbers (331) 3888413 and 03339362293 to join the enquiry proceedings but he did not bother to appear before him which shows that he is not taking interest in his official duty. Thus enquiry officer found him guilty and recommended for ex-parte action.

He was issued final Show Cause Notice vide this office No. 3090/PA, SP Rural dated 15.11.2014 to which he submitted reply but could not found satisfactory. He was repeatedly summoned on his mobile phone number as well as vide DD No. 47, dated 10.01.2015 of Police Lines to attend this office but he did not bother to appear before the undersigned for personal hearing.

His service record was checked which revealed that he was enlisted in service on 30.03.2006 and during his service he carries 11 bad entries, 01 good entry and 02 minor punishment.

Keeping in view his long absence and other material on record, the undersigned reached a conclusion that the alleged Constable Isif No. 5519 is guilty of the charges. Therefore, the undersigned, being a competent authority, awarded him the major punishment of "Dismissal from Service" under Police Rules 1917 and his absence period is treated as lost pay.

Under announce

(Signature)

(SHAHIR BANGASH)
SUPERINTENDENT OF POLICE
RURAL, PESHAWAR.

Off. No. 483
Dated: 6/2/2015

To: 52 /SP-R, dated Peshawar dt. 9/2/2015

- Copy to:
- 1) The SP HQs: Peshawar.
- 2) SDPO Chamkani (E.O)
- 3) SDPO Saddar.
- 4) DSP Legal
- 5) R.I. Police Lines
- 6) Pay Officer
- 7) EMC, Computer Cell, CRC, I.D. Pay & O.M.
- 8) Multanrar Police Lines.
- 9) EMC (along-with enclosure)

(Large handwritten signature/initials)
9/2/2015

AST 6
0315

9205445

Erman Muses & Micals -

BETTER COPY-NO.9

ORDER

This is office order for disposal of departmental proceeding against constable Asif No. 5519 on the grounds that he while posted at police station Badaber absented himself from his lawful duty with effect from: 17-11-2013 to 08-08-2014 without leave or permission.

Departmental proceedings were initiated him and SDPO Chamkani circle was appointed as enquiry officer who vide his findings submitted that the alleged constable was telephonically summoned time and again on his mobile phone numbers 0311-8885443 and 03339303293) to join the enquiry proceeding but he did not bother to appear before him which shows that he is not taking interest in his official duty. Thus we found him guilty and recommended for ex-parte action.

He was issued final show cause Notice vide this office No. 5690/PA, SP Rural dated: 09-12-2014 to which he submitted reply but could not found satisfactory. He was repeatedly summoned on his mobile phone number as well as vide DD No. 17 dated:02-02-2014 police Lines to attend this office but he did not bother to appear before the undersigned for personal hearing.

His service record was checked which revealed that he was enlisted in service on 20-05-2006 and during his service he carries 11 bad entries, good entry and 02 minor punishment.

Keeping in view his long absence and other material on record the undersigned came to conclusion that the alleged **Constable Asif No. 5519** is guilty of the charges. Therefore, the undersigned being a compeat authority award him the major punishment of "Dismissed from service" under police Rules 1975 and his absence period is counted without pay.

Order announced.

SD

SUPERINTENDENT OF POLECE
, PESHAWAR.

OB NO. 483

Dated: 6/2/2015.

NO. 52/SP-R dated Peshawar the 9/2/2015.

Copy to:

1. The SP HQrs: Peshawar.
2. SDPO Chamkani (E.O)
3. SDPO Saddar.
4. DSP Legal
5. R.I Police Lines
6. Pay Officer
7. FMC, computer cell, CRC IO-PAY & OSI.
8. Muharrar Police Lines.
9. FMC (along- enclosure).

ATTESTED


(10)

Annex 2



Lady Reading Hospital Peshawar Out-Patients Department

RS-10/-

Yearly No: 109495877

Date: 12-Dec-2013

Name: Muhammad Asif

OPD:

فری ایجوو لینس سروں کیلئے 137 پرکال کریں۔

Orthopedic

Tab:
Nabon 130/80
1 1/2 Tab
Tab. B. C. 141 20
Tab. B. C. 141 20
Tab. B. C. 141 20

Medical Superintendent
Lady Reading Hospital
Peshawar

Resident Med. Officer
Lady Reading Hospital
Peshawar

Admission (One) Month. Sick leave
12/12/2013
Registered
Orthopedic
Peshawar

ATTENDED

11



Lady Reading Hospital

Peshawar

Out-Patients Department

RS-10

0008382

13-Jan-2014

Yearly No: Muhammad Asif

Date:

Orthopedic

Name:

OPD:

فری ایجوکیشن سروس کیلئے 137 پرکال کریں۔

dis patient of L.R.
Hospital Peshawar

Dr. T. Phulega

Dr. Vatsal

Dr. Kamal

Dr. Hussain

Admin. In-charge
w.c. Jan 13/01/2014

Medical Superintendent
Lady Reading Hospital
Peshawar.

Resident Medical Officer
Lady Reading Hospital
Peshawar.

Orthopedic
L.R.H.

ATTESTED

12



Lady Reading Hospital Peshawar Out-Patients Department

RS-101

Yearly No: 1109213

Date: 14-Feb-2014

Name:

OPD:

Muhammad Asif

Orthopedic

فری ایجوویشن سروس کیلئے 137 پرکال کریں۔

Abt pain of diffrence
of disc of lumb. vertebrae

Medical Superintendent
Lady Reading Hospital
Peshawar.

Admission

Tab: Voltadol Regu V. Day
1 + 1 BR

Tab: Dulobid 100mg
1 + 1

Tab: Easoz. 120mg
1 + 1

Tab: Letrenol 120mg
1 + 1

Handwritten notes in Urdu script

Handwritten signature and date: 14/02/2014

Medical Superintendent
Lady Reading Hospital
Peshawar.

Handwritten signature

(13)



Lady Reading Hospital Peshawar Out-Patients Department

Rs. 10/-

Yearly No: 34211435

Date: 15-March-2014

Name: Muhammad Asif

OPD: Orthopedic

فری ایجوکیشن سروس کیلئے 137 پرکال کریں۔

Old pain of ~~disceus~~
trunk

[Signature]

Medical Officer
Lady Reading Hospital
Peshawar

Dr. Fa. Nuebsch
Assoc. Consultant
USIC Head.

Feb. 14 70
Feb. 15 40

Cambridge

Registrar
Lady Reading Hospital
Peshawar

Feb. 15 20
Admission 15/3/2014
Registrar
Orthopedic Unit
L.R.H. Peshawar

[Handwritten mark]

14



Lady Reading Hospital Peshawar Out-Patients Department

Rs. 10/-

Yearly No: 34211435

Date:

16-April-2017

Name:

OPD:

Muhammad Asif

فری ایجوکیشن سروس کیلئے 137 پرکال کریں۔

Orthopedic

fracture of distal radius

Accid
PH. J. 10/10/16

Toe Distal radius

Toe Dorsum of

Toe Nucleus

Toe Distal radius
wound in distal radius

Asif (Reg) M.D. Ortho
Registered Medical Officer
Lady Reading Hospital
Peshawar.

seen on 16/04/2017

[Handwritten signature]

15



Lady Reading Hospital Peshawar Out-Patients Department

Rs. 10/-

Yearly No: 45321546

Date: 17-May-2014

Name: Muhammad Asif

OPD: Orthopedic

فری ایسویٹیشن سروس کیلئے 137 برکال کریں۔

Pair of Heels
Beck's test

Toe N/A

Toe 1, 2, 3

Toe 4, 5

toes 1, 2, 3, 4, 5

Heel (one) on floor

once a few days

Handwritten signature

Handwritten signature

Lady Reading Hospital
Peshawar

Lady Reading Hospital
Peshawar

TESTED

16



Lady Reading Hospital
Peshawar
Out-Patients Department

Rs. 10/-

Yearly No: 56432657

Date: 18-June-2014

Name: Muhammad Asif

OPD: Orthopedic

فری ایسولیشن سروسز کیلئے 137 برکال کریں۔
In hand of Dr. Asif

Dr. Tahir

Dr. Nabeel

Dr. Feroze Adnan

Dr. CD

Active (One) Member

18/03/2014

Medical Superintendent
Lady Reading Hospital
Peshawar

Resident Medical Officer
Lady Reading Hospital
Peshawar

ATTENDED

17



Lady Reading Hospital
Peshawar

Rs. 10/-

Out-Patients Department

Yearly No: 67543768

Date: 19-July-2014

Name: Muhammad Asif

OPD: Orthopedic

فزی ایمبولینس سروس کیلئے 137 پرکال کریں۔

part head of Discharge

Impound Name

To: Muzammar Ahmad

for the purpose of...

To: Calicut - present

for the purpose of...

To: Jinnah

Admission (63) weeks full

for the purpose of... 19/07/2014

Medical Superintendent
Lady Reading Hospital
Peshawar

Resident Medical Officer
Lady Reading Hospital
Peshawar

ATTESTED

ORDER

(19)

Ann-15
1

This order will dispose off departmental appeal of ex-constable **Asif No. 5519** who was awarded the major punishment of **Dismissal** from service under PR-1975 vide OB No. 483 dated 6.2.2015 by SP/Rural Peshawar, on the charge of deliberate absence for a long time from lawful duty w.e.f. 17.11. 2013 to 8.8.2014 **(Total 8-months and 21-days)** from PS Badhaber.

Proper departmental proceedings were initiated against him and DSP/Chamani was appointed as the E.O. The enquiry officer during the course of enquiry contacted the appellant on his Mobile Phone but he failed to appear and defend himself. On receipt of the findings of the E.O. the Competent Authority issued him SCN to which he replied but the same was found unsatisfactory. Hence the Competent Authority awarded him the above major punishment.

The relevant record was perused along with his explanation. He was also heard in person in OR on 24/4/2015. He could not defend himself. The allegations stand proved against him. He deserves no leniency. The order of SP-Rural is upheld and his appeal for re-instatement in service is rejected/filed.

**CAPITAL CITY POLICE OFFICER,
PESHAWAR.**

No. 2282-87 /PA dated Peshawar the 29.4. 15

Copies for information and n/a to the :-

- 1/ SP-Rural Peshawar
- 2/ PO/ OASI
- 3/ CRC along with S.Roll for making n/entry.
- 4/ FMC along with FM.
- 5/ Official concerned.

ATTESTED



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR
PAY ROLL SYSTEM AG NUFP PESH

PAYMENT ADVICE

P Sec: 006 Month: November 2013
PR4093 -DDO FUK CAPITAL CITY POLI
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621

DEPTT CODE

Pers # 00287830 BUCLE 164
Name: MUHAMMAD ASIF KHAN
Dsg: CONSTABLE
CNIC No. 1730159219597

BPS Interest Applied

05 Active Temporary		PR4093
PAYS AND ALLOWANCES:		
0001-Basic Pay		7,220.00
1001-House Rent Allowance 45%		1,593.00
1210-Convey Allowance 2005		1,840.00
1300-Medical Allowance		1,000.00
1547-Ration Allowance		681.00
1567-Washing Allowance		100.00
1646-Constabulary R Allowance		300.00
1901-Risk Allowance (Police)		5,010.00
1902-Special Incentive Allowance		775.00
Gross Pay and Allowances		20,139.00
DEDUCTIONS:		
GPF Balance	14,486.00	Subrc: 465.00
6505-GPF Loan Principal Instal	Bal: 0.00	400.00
3511-Addl Group Insurance		7.00
3604-Group Insurance		67.00

Asif

JD

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON
07 Years 06 Months

D.O.B
01.02.1986
012 Days

LFP Quota: 4
NATIONAL BANK OF PAK
UNIVERSITY CAMPUS
2470-1



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR
PAY ROLL SYSTEM AG NUFP PESH

PAYMENT ADVICE

P Sec: 006 Month: November 2013
PR4093 -DDO FUK CAPITAL CITY POLI
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621

DEPTT CODE

Pers # 00287830 BUCLE 164
Name: MUHAMMAD ASIF KHAN
Dsg: CONSTABLE
CNIC No. 1730159219597

BPS Interest Applied

05 Active Temporary		
PAYS AND ALLOWANCES:		
1970-Adhoc Relief Allow 2011		
2148-15% Adhoc Relief All-2013		
Gross Pay and Allowances		
DEDUCTIONS:		
GPF Balance	14,486.00	Subrc:

Asif

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON
07 years 06 Months

D.O.B
01.02.1986
012 Days

LFP Quota:
NATIONAL BANK OF PAK
UNIVERSITY CAMPUS
2470-1

GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR
PAY ROLL SYSTEM AG NWFP PESH

PAYMENT ADVICE

P Sec: 006 Month: December 2013
PR4093 - DDU FOR CAPITAL CITY POL
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621

DEPTT CODE

Pers No: 00287830 - Buckle 164
Name: MUHAMMAD ASIF KHAN
Des: CONSTABLE
CNIC No: 1730157219577
BPS Interest Applied

05 Active Temporary
PAYS AND ALLOWANCES:
0001-Basic Pay
1001-HOUSE Rent Allowance 45%
1210-Convey Allowance 2005
1300-Medical Allowance
1547-Ration Allowance
1567-Washing Allowance
1646-Constabulary R Allowance
1701-RISK Allowance (Police)
1702-Special Incentive Allowance
Gross Pay and Allowances

DEPTT CODE	PR4093	AMOUNT
		7,480.00
		1,503.00
		1,840.00
		1,000.00
		681.00
		100.00
		300.00
		5,010.00
		775.00
		20,432.00

GPF Balance 14,951.00
3511-Addl Group Insurance
3614-Group Insurance

Subtr: 465.00
7.00
67.00

Total Deductions

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON

07 Years 07 Months

D. O. B
01.02.1986
13 Days

LFP Quota: 4
NATIONAL BANK OF PAK UNIVERSITY CAMPUS
2470-1

GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR
PAY ROLL SYSTEM AG NWFP PESH

PAYMENT ADVICE

P Sec: 006 Month: December 2013
PR4093 - DDU FOR CAPITAL CITY
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621

DEPTT CODE

Pers No: 00287830 - Buckle 164
Name: MUHAMMAD ASIF KHAN
Des: CONSTABLE
CNIC No: 1730157219577
BPS Interest Applied

05 Active Temporary
PAYS AND ALLOWANCES:
1970-Adhoc Relief Allow 2011
2148-15% Adhoc Relief All-2013

Gross Pay and Allowances
DEDUCTIONS:
GPF Balance 14,951.00

Total Deductions

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON

07 Years 07 Months

D. O. B
01.02.1986
13 Days

LFP Quota:
NATIONAL BANK OF PAK UNIVERSITY CAMPUS
2470-1

ATTES

PAYMENT ADVICE

P Sec: 008 Month: January 2014
PR4093 -000 FOR CAPITAL CITY POL
NTN: Home & Tribal Affairs
GPF #: POL 51621
Old #:

Ref: 00267530 Ruckle: 164
Name: MUHAMMAD ASIF KHAN
Dsg: CONSTABLE
GNIC No: 1730159219597
GPF Interest Applied

DEPTT CODE PR4093

BPS 05 Active Temporary
PAYS AND ALLOWANCES

0001-Basic Pay	
1001-House Rent Allowance 45%	7,480.00
1210-Convey Allowance 2005	1,503.00
1300-Medical Allowance	1,840.00
1547-Ration Allowance	1,000.00
1567-Washing Allowance	681.00
1646-Constabulary R Allowance	100.00
1901-Risk Allowance (Police)	300.00
1902-Special Incentive Allowance	5,010.00
Gross Pay and Allowances	20,432.00
DEDUCTIONS:	
Subrc:	465.00
	7.00
	67.00
Total Deductions	1,919.00
NET AMOUNT PAYABLE	2,458.00

GPF Balance 15,416.00
3511-Addl Group Insurance
3604-Group Insurance
5801-Adj Basic Pay

QUALIFYING SERVICE
YRS 7 Months
MON 08 Months

D. O. B
01.02.1986
013 Days

LFP Quota: 4
NATIONAL BANK OF PAKUNIVERSITY CAMPUS
2470-1

PAYMENT ADVICE

P Sec: 008 Month: January 2014
PR4093 -000 FOR CAPITAL CITY POL
NTN: Home & Tribal Affairs
GPF #: POL 51621
Old #:

Ref: 00267530 Ruckle: 164
Name: MUHAMMAD ASIF KHAN
Dsg: CONSTABLE
GNIC No: 1730159219597
GPF Interest Applied

DEPTT CODE PR4093

BPS 05 Active Temporary
PAYS AND ALLOWANCES

1970-Adhoc Relief Allow 2011	
2148-15% Adhoc Relief All-2013	
Gross Pay and Allowances	
DEDUCTIONS:	
Subrc:	
GPF Balance 15,416.00	
Total Deductions	
NET AMOUNT PAYABLE	15,416.00

QUALIFYING SERVICE
YRS 7 Months
MON 08 Months

D. O. B
01.02.1986
013 Days

LFP Quota:
NATIONAL BANK OF PAKUNIVERSITY CAMPUS
2470-1

ATTACHED

GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR AG NUFF PESH
PAYROLL SYSTEM

PAYMENT ADVICE
P Sec: 006 Month: February 2014
PR4093 -DDO FOR CAPITAL CITY FOLI

Pers# 00287830 Buckle 164
Name MUHAMMAD WASM KHAN
Dsg: CONSTABLE
CNIC No 173015219597
GPF Interest Applied

Min Home & Tribal Affairs
NTN
BPF # POL 51621
Old #

DEPTT CODE PR4093

BPS 05 Active Temporary

PAYS AND ALLOWANCES:	
0001-Basic Pay	7,480.00
1001-House Rent Allowance 45%	1,503.00
1210-Convey Allowance 2005	1,840.00
1300-Medical Allowance	1,000.00
1547-Ration Allowance	681.00
1567-Washing Allowance	100.00
1646-Constabulary R Allowance	300.00
1901-Risk Allowance (Police)	5,010.00
1902-Special Incentive Allowance	775.00
Gross Pay and Allowances	20,432.00

DEDUCTIONS	
GPF Balance	15,881.00
301-Addl Group Insurance	7.00
304-Group Insurance	67.00
Total Deductions	15,955.00

NET AMOUNT PAYABLE 4,477.00

QUALIFYING SERVICE
YRS: 07 Months: 09 Days

D.O.B: 01.02.1986
LFP Quota: 4
NATIONAL BANK OF PAK UNIVERSITY CAMPUS
2470-1

GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR AG NUFF PESH
PAYROLL SYSTEM

PAYMENT ADVICE
P Sec: 006 Month: February 2014
PR4093 -DDO FOR CAPITAL CITY FOLI

Pers# 00287830 Buckle 164
Name MUHAMMAD ASLE KHAN
Dsg: CONSTABLE
CNIC No 173015219597
GPF Interest Applied

Min Home & Tribal Affairs
NTN
BPF # POL 51621
Old #

DEPTT CODE PR4093

BPS 05 Active Temporary

PAYS AND ALLOWANCES:	
1970-Adhoc Relief Allow 2011	621.00
2148-15% Adhoc Relief All-2013	1,132.00
Gross Pay and Allowances	20,432.00

DEDUCTIONS	
GPF Balance	15,881.00
Total Deductions	15,881.00

NET AMOUNT PAYABLE 4,551.00

QUALIFYING SERVICE
YRS: 07 Months: 09 Days

D.O.B: 01.02.1986
LFP Quota: 4
NATIONAL BANK OF PAK UNIVERSITY CAMPUS
2470-1

ATTENTION

PAYMENT ADVICE

P. Sec-006 Month: March 2014
 PR4093-DDO FOR CAPITAL CITY POLI

PAY ROLL SYSTEM

Pers. No. 00287820 Pckt. 164

Name: MUHAMMAD ASIF KHAN
 Dsg: CONSTABLE
 CNIC No: 1730159219597

Min: Home & Tribal Affairs
 NTN:
 GPF # POL 51621
 Old #:

DEPTT CODE PR4093

BPS 05 Active Temporary

PAYS AND ALLOWANCES:

0001 Basic Pay	7,480.00
1001 House Rent Allowance 45%	1,503.00
1210 Convey Allowance 2005	1,840.00
1300 Medical Allowance	1,000.00
1547 Ration Allowance	681.00
1567 Washing Allowance	100.00
1646 Constabulary R Allowance	300.00
1901 Risk Allowance (Police)	5,010.00
1902 Special Incentive Allowance	775.00
Gross Pay and Allowances	20,432.00

DEDUCTIONS:	
GPF Balance 16,346.00	Subrc: 465.00
351 Addl Group Insurance	7.00
360 Group Insurance	67.00
Total Deductions	539.00

NET AMOUNT PAYABLE 19,893.00

QUALIFYING SERVICE
 YRS 7 Years 10 Months

D.O.B
 01.02.1985
 013 Days

LFP Quota 4
 NATIONAL BANK OF PAK UNIVERSITY CAMPUS
 2470-1

PAYMENT ADVICE

P. Sec-006 Month: March 2014
 PR4093-DDO FOR CAPITAL CITY P

PAY ROLL SYSTEM

Pers. No. 00287820 Pckt. 164

Name: MUHAMMAD ASIF KHAN
 Dsg: CONSTABLE
 CNIC No: 1730159219597

Min: Home & Tribal Affairs
 NTN:
 GPF # POL 51621
 Old #:

DEPTT CODE PR4093

BPS 05 Active Temporary

PAYS AND ALLOWANCES:

1970 Adhoc Relief Allow 2011	421.00
2148-15% Adhoc Relief All-2013	1,122.00

Gross Pay and Allowances 20,432.00

DEDUCTIONS:	
GPF Balance 16,346.00	Subrc: 465.00
Total Deductions	539.00

NET AMOUNT PAYABLE 19,893.00

QUALIFYING SERVICE
 YRS 7 Years 10 Months

D.O.B
 01.02.1985
 013 Days

LFP Quota 4
 NATIONAL BANK OF PAK UNIVERSITY CAMPUS
 2470-1

ATTESTED

PAYMENT ADVICE

P. Sec. 006 Month April 2014
PR4093-DDO FOR CAPITAL CITY POLI

Min Home & Tribal Affairs
MTN
GPF # POL 51621
Old #

Pers # 00287890 Buckle 164
Name MUHAMMAD ASIF KHAN
Dsg CONSTABLE
CNIC No 730159219597
GPF Interest Applied

BPS 05 Active Temporary

DEPTT CODE PR4093

PAYS AND ALLOWANCES	
0001-Basic Pay	7,480.00
1001-House Rent Allowance 45%	1,509.00
1210-Convey Allowance 2005	1,840.00
1300-Medical Allowance	1,000.00
1547-Ration Allowance	681.00
1567-Washing Allowance	100.00
1646-Constabulary R Allowance	300.00
1901-Risk Allowance (Police)	5,010.00
1902-Special Incentive Allowance	775.00
Gross Pay and Allowances	23,162.00

DEDUCTIONS	
GPF Balance 16,811.00	
8511-Add'l Group Insurance	465.00
3004-Group Insurance	7.00
5001-Adj Basic Pay	6,631.00
Total Deductions	7,170.00

NET AMOUNT PAYABLE 16,000.00

QUALIFYING SERVICE
YRS 07 MON 11 Months

D.O.B 01.02.1986
012 Days

LFP Quota 4
NATIONAL BANK OF PAK UNIVERSITY CAMPUS
2470-1

PAYMENT ADVICE

P. Sec. 006 Month April 2014
PR4093-DDO FOR CAPITAL CITY POLI

Min Home & Tribal Affairs
MTN
GPF # POL 51621
Old #

Pers # 00287890 Buckle 164
Name MUHAMMAD ASIF KHAN
Dsg CONSTABLE
CNIC No 730159219597
GPF Interest Applied

BPS 05 Active Temporary

DEPTT CODE PR4093

PAYS AND ALLOWANCES	
1970-Adhoc Relief Allow 2011	521.00
2148-15% Adhoc Relief All-2013	1,122.00
2168-Fixed Daily Allowance	2,756.00
Gross Pay and Allowances	23,162.00

DEDUCTIONS	
GPF Balance 16,811.00	
Subrc	
Total Deductions	7,170.00

NET AMOUNT PAYABLE 16,000.00

QUALIFYING SERVICE
YRS 07 MON 11 Months

D.O.B 01.02.1986
012 Days

LFP Quota 4
NATIONAL BANK OF PAK UNIVERSITY CAMPUS
2470-1

ATTESTED

Min. Home & Tribal Affairs
NTN
GPF # POL 51621
Old #

DEPTT CODE PR4093

Pers. No. 00287880 Buckle 64
Name MUHAMMAD ASIF KHAN
Dsg. CONSTABLE
CNIC No. 1730159219597
GPF Interest Applied

BPS 05 Active Temporary

PAYS AND ALLOWANCES	
0001-Basic Pay	7,480.00
1001-House Rent Allowance 45%	1,503.00
1210-Convey Allowance 2005	1,840.00
1300-Medical Allowance	1,000.00
1547-Ration Allowance	681.00
1567-Washing Allowance	100.00
1646-Constabulary R Allowance	300.00
1701-Risk Allowance (Police)	5,010.00
1902-Special Incentive Allowance	775.00
Gross Pay and Allowances	23,162.00

DEDUCTIONS

GPF Balance	17,276.00
3511-Addl. Group Insurance	465.00
3604-Group Insurance	7.00
	67.00

Total Deductions

NET AMOUNT PAYABLE 2,423.00

QUALIFYING SERVICE
YRS 00 Months

D.O.B
01.02.1985
013 Days

LFP Quota 4
NATIONAL BANK OF PAK UNIVERSITY CAMPUS
2470-1

Pers. No. 00287880 Buckle 64
Name MUHAMMAD ASIF KHAN
Dsg. CONSTABLE
CNIC No. 1730159219597
GPF Interest Applied

BPS 05 Active Temporary

PAYS AND ALLOWANCES	
1970-Adhoc Relief Allow 2011	421.00
2148-15% Adhoc Relief All-2013	1,122.00
2168-Fixed Daily Allowance	2,720.00

Gross Pay and Allowances

DEDUCTIONS:	23,162.00
GPF Balance	17,276.00

Total Deductions

NET AMOUNT PAYABLE 2,423.00

QUALIFYING SERVICE
YRS 00 Months

D.O.B
01.02.1985
013 Days

LFP Quota
NATIONAL BANK OF PAK UNIVERSITY CAMPUS
2470-1

ATTESTED



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR AG NWFP PESH
PAY ROLL SYSTEM

PAYMENT ADVICE

P-Sec: 006 - Month: June 2014
PR4093 - DDD FOR CAPITAL CITY POLI

Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621
Old #:

DEPTT CODE PR4093

Pers # : 00287830 Buckle : 64
Name : MUHAMMAD ASIF KHAN
Dsg : CONSTABLE
CNIC No. 1730159219597

BPS Interest Applied
BPS 05 Active Temporary

PAYS AND ALLOWANCES:

0001-Basic Pay	7,480.00
1001-House Rent Allowance 45%	1,503.00
1210-Convey Allowance 2005	1,840.00
1300-Medical Allowance	1,000.00
1547-Ration Allowance	681.00
1567-Washing Allowance	100.00
1646-Constabulary R Allowance	300.00
1901-Risk Allowance (Police)	5,010.00
1902-Special Incentive Allowance	775.00
Gross Pay and Allowances	23,162.00

DEDUCTIONS:

GPF Balance 17,741.00	Subrc:	465.00
3511-Addl Group Insurance		7.00
3604-Group Insurance		67.00
5801-Adj Basic Pay		4,631.00

Total Deductions

7,170.00

NET AMOUNT PAYABLE

15,992.00

QUALIFYING SERVICE
YRS MON
08 Years 01 Months

D.O.B
01.02.1988
012 Days

LFP Quota: 4
NATIONAL BANK OF PAKUNIVERSITY CAMPUS
2470-1



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR AG NWFP PESH
PAY ROLL SYSTEM

PAYMENT ADVICE

P-Sec: 006 - Month: June 2014
PR4093 - DDD FOR CAPITAL CITY POLI

Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621
Old #:

DEPTT CODE PR4093

Pers # : 00287830 Buckle : 64
Name : MUHAMMAD ASIF KHAN
Dsg : CONSTABLE
CNIC No. 1730159219597

BPS Interest Applied
BPS 05 Active Temporary

PAYS AND ALLOWANCES:

1970-Adhoc Relief Allow 2011	1,811.00
2148-15% Adhoc Relief All-2013	1,132.00
2168-Fixed Daily Allowance	2,130.00

Gross Pay and Allowances

25,162.00

DEDUCTIONS:

GPF Balance 17,741.00

Subrc:

Total Deductions

7,170.00

NET AMOUNT PAYABLE

17,992.00

QUALIFYING SERVICE
YRS MON
08 Years 01 Months

D.O.B
01.02.1988
012 Days

LFP Quota:
NATIONAL BANK OF PAKUNIVERSITY CAMPUS
2470-1

ATTACHED



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR
PAY ROLL SYSTEM

PAYMENT ADVICE

P Sec:006 Month:July 2014
PR4093 -DDO FOR CAPITAL DISTRICT POLI
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621

DEPTT CODE

164
164

CNIC No. 1730157219577
BPS GPF Interest Applied
05 Active Temporary
PAYS AND ALLOWANCES:
0001-Basic Pay
1001-House Rent Allowance 45%
1210-Convey Allowance 2005
1300-Medical Allowance
1547-Ration Allowance
1567-Washing Allowance
1646-Constabulary R Allowance
1901-Risk Allowance (Police)
1902-Special Incentive Allowance
Gross Pay and Allowances
DEDUCTIONS:
GPF Balance 20,211.00
3511-Addl Group Insurance
3604-Group Insurance
3211-CN KP Fund IDP,S-NW-2014

PR4093	
7,480.00	
1,500.00	
1,930.00	
1,200.00	
581.00	
100.00	
300.00	
5,010.00	
775.00	
24,202.00	
Subrc: 465.00	
7.00	
67.00	
242.00	

Total Deductions

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON
08 Years 02 Months

D.O.B
01.02.1986
013 Days

LFP Quota: 4
NATIONAL BANK OF PAK
UNIVERSITY CAMPUS
2470-1



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR
PAY ROLL SYSTEM AG NWFP PESH

PAYMENT ADVICE

P Sec:006 Month:July 2014
PR4093 -DDO FOR CAPITAL DISTRICT POLI
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621

DEPTT CODE

164
164

CNIC No. 1730157219577
BPS GPF Interest Applied
05 Active Temporary
PAYS AND ALLOWANCES:
1970-Adhoc Relief Allow 2011
2148-15% Adhoc Relief All-2013
2168-Fixed Daily-Allowance
2174-Adhoc Relief Allow-2014
Gross Pay and Allowances
DEDUCTIONS:
GPF Balance 20,211.00

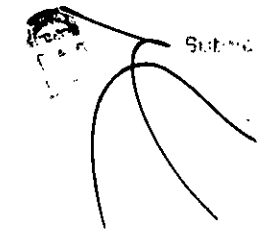
Total Deductions

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON
08 Years 02 Months

D.O.B
01.02.1986
013 Days

LFP Quota:
NATIONAL BANK OF PAK
UNIVERSITY CAMPUS
2470-1



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR AG NWFP PESH
PAY ROLL SYSTEM

PAYMENT ADVICE

F Sec: 006 Month: August 2014
PR4073 - DDO FOR CAPITAL CTR POLI
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621

DEPTT CODE

GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR AG NWFP PESH
PAY ROLL SYSTEM

PAYMENT ADVICE

F Sec: 006 Month: August 2014
PR4073 - DDO FOR CAPITAL CTR
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621

DEPTT CODE

Pers # 00287830 Buckle 164
Name MUHAMMAD ASIF KHAN
Dsg CONSTABLE
CNIC No 1730159219577
BPSGF Interest Applied

PAYS AND ALLOWANCES:

0001-Basic Pay	7,480.00
1001-House Rent Allowance 45%	1,503.00
1210-Convey Allowance 2005	1,932.00
1300-Medical Allowance	1,200.00
1547-Ration Allowance	481.00
1567-Washing Allowance	100.00
1646-Constabulary R Allowance	300.00
1901-Risk Allowance (Police)	5,010.00
1902-Special Incentive Allowance	775.00
Gross Pay and Allowances	24,202.00

DEDUCTIONS:

GPF Balance	20,676.00	Subrc:	465.00
3511-Addl Group Insurance			7.00
3604-Group Insurance			67.00

Total Deductions

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON

08 Years 03 Months

D.O.B
01.02.1986
013 Days

LFP Quota: 4
NATIONAL BANK OF PAKUNIVERSITY CAMPUS
2470-1

QUALIFYING SERVICE
YRS MON

08 Years 03 Months

D.O.B
01.02.1986
013 Days

LFP Quota:
NATIONAL BANK OF PAKUNIVERSITY CAMPUS
2470-1

DEPTT CODE

05 Active Temporary

PAYS AND ALLOWANCES:

1970-Adhoc Relief Allow 2011	421.00
2148-15% Adhoc Relief All-2013	1,122.00
2168-Fixed Daily Allowance	2,700.00
2174-Adhoc Relief Allow-2014	748.00

Gross Pay and Allowances

DEDUCTIONS:

GPF Balance 20,676.00

Total Deductions

NET AMOUNT PAYABLE



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR
PAY ROLL SYSTEM AG NWFP PESH

PAYMENT ADVICE

P Sec: 006 Month: September 2014
PR4093 -DDU FOR CAPITAL CITY POLI
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621
DIA #:

DEPT CODE

Pers # 00287830 Buckle 164
Name: MUHAMMAD ASIF KHAN
Dsg: CONSTABLE
CNIC No: 1730159219597
BPS Interest Applied

05 Active Temporary		PR4093
PAYS AND ALLOWANCES:		
0001-Basic Pay		7,480.00
1001-House Rent Allowance 45%		1,503.00
1210-Convey Allowance 2005		1,932.00
1300-Medical Allowance		1,200.00
1547-Ration Allowance		681.00
1567-Washing Allowance		100.00
1646-Constabulary R Allowance		300.00
1901-Risk Allowance (Police)		5,010.00
1902-Special Incentive Allowance		775.00
Gross Pay and Allowances		24,202.00

DEDUCTIONS:		
GPF Balance	21,141.00	Subrc: 465.00
3511-Addl Group Insurance		7.00
3601-Group Insurance		67.00

Total Deductions

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON

08 Years 04 Months

D.D.B
01.02.1986
012 Days

LFP Quota: 4
NATIONAL BANK OF PAK UNIVERSITY CAMPUS
2470-1



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR
PAY ROLL SYSTEM AG NWFP PESH

PAYMENT ADVICE

P Sec: 006 Month: September 2014
PR4093 -DDU FOR CAPITAL CITY P
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621
DIA #:

DEPT CODE

Pers # 00287830 Buckle 164
Name: MUHAMMAD ASIF KHAN
Dsg: CONSTABLE
CNIC No: 1730159219597
BPS Interest Applied

05 Active Temporary		PR4093
PAYS AND ALLOWANCES:		
1970-Adhoc Relief Allow 2011		601.00
2148-15% Adhoc Relief All-2013		1,132.00
2168-Fixed Daily Allowance		2,720.00
2174-Adhoc Relief Allow-2014		583.00
Gross Pay and Allowances		24,302.00

DEDUCTIONS:		
GPF Balance	21,141.00	Subrc:

Total Deductions

NET AMOUNT PAYABLE

QUALIFYING SERVICE
YRS MON

08 Years 04 Months

D.D.B
01.02.1986
012 Days

LFP Quota:
NATIONAL BANK OF PAK UNIVERSITY CAMPUS
2470-1

ATTESTED



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR
PAY ROLL SYSTEM AG NUFP PESH

PAYMENT ADVICE

P Sec: 006 Month: October 2014
PR4093 -000 FOR CAPITAL CIT POLI
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621

DEPTT CODE

FR4093

Pers. # 00287830 Buckle 64
Name: MUHAMMAD ASIF KHAN
Dsg: CONSTABLE
CNIC No. 1730159219597

BPSPF Interest Applied

05 Active Temporary

PAYS AND ALLOWANCES:

0001-Basic Pay	7,480.00
1001-House Rent Allowance 45%	1,503.00
1210-Convey Allowance 2005	1,932.00
1300-Medical Allowance	1,200.00
1547-Ration Allowance	681.00
1567-Washing Allowance	100.00
1646-Constabulary R Allowance	300.00
1901-Risk Allowance (Police)	5,010.00
1902-Special Incentive Allowance	775.00
Gross Pay and Allowances	24,202.00

DEDUCTIONS:

GPF Balance 21,606.00	Subrc:	465.00
3511-Addl Group Insurance		7.00
3604-Group Insurance		67.00

Total Deductions

NET AMOUNT PAYABLE

23,737.00

QUALIFYING SERVICE
YRS MON

08 Years 05 Months

D.O.B
01.02.1985
013 Days

LFP Quota: 4
NATIONAL BANK OF PAKUNIVERSITY CAMPUS
2470-1



GOVERNMENT OF PAKISTAN
ACCOUNTANT GENERAL PAKISTAN REVENUE
PESHAWAR
PAY ROLL SYSTEM AG NUFP PESH

PAYMENT ADVICE

P Sec: 006 Month: October 2014
PR4093 -000 FOR CAPITAL CIT POLI
Min: Home & Tribal Affairs
NTN:
GPF #: POL 51621

DEPTT CODE

FR4093

Pers. # 00287830 Buckle 64
Name: MUHAMMAD ASIF KHAN
Dsg: CONSTABLE
CNIC No. 1730159219597

BPSPF Interest Applied

05 Active Temporary

PAYS AND ALLOWANCES:

1970-Adhoc Relief Allow 2011	425.00
2148-15% Adhoc Relief All-2013	1,200.00
2168-Fixed Daily Allowance	2,000.00
2174-Adhoc Relief Allow-2014	1,000.00

Gross Pay and Allowances

GPF Balance 21,606.00

Total Deductions

NET AMOUNT PAYABLE

24,131.00

QUALIFYING SERVICE
YRS MON

08 Years 05 Months

D.O.B
01.02.1985
013 Days

LFP Quota: 4
NATIONAL BANK OF PAKUNIVERSITY CAMPUS
2470-1

ATTESTED

TO: THE SP RURAL, PESHAWAR
FROM: THE SDPO CHAMKANI, PESHAWAR
NO. 34 /ST, DATED: 2-12 /2014
SUBJECT: ENQUIRY AGAINST FC ASIF NO. 5519 PS BADABER

(33)

† (33)
Ann-G²

MEMO:

Please refer to your office diary No. 87/PA, dated: 29.09.2014 on the subject cited above.

ALLEGATIONS:

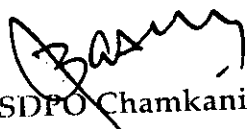
According to the statement of allegations, Constable Asif No. 5519 while posted at PS Badaber remained absent from his lawful duty with effect from 17.11.2013 to 08.08.2014 without leave or permission.

FINDINGS:

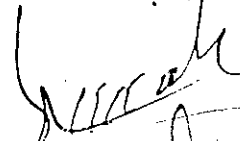
The alleged official was telephonically summoned time and again on his mobile phone numbers 03339303293 and 03118885443 to join the enquiry proceedings but he did not bother to appear before the undersigned which shows that he is not taking interest in his official duty.

RECOMMENDATION:

Keeping in view the above, it is recommended that ex-parte action may please be initiated against him.


SDPO Chamkani

Issue final S.C.P


SP/Rural
2/12/14
ATTESTED

وکالت نامہ

بعدالت: محمد کوثر اسد سہیل
 نامہ: C.C. No. 15/08
 منجانب: ایڈووکیٹ دعویٰ یا جرم
 تھانہ: ایف آئی آر تاریخ: _____

باعث تحریر آنکہ مقدمہ مندرجہ بالا عنوان اپنی طرف سے واسطے پیروی اور جوابدہی کے لیے جاوید اقبال گل بیلہ ایڈووکیٹ ہائی کورٹ کو برسر شرط وکیل مقرر کیا ہے۔ کہ میں ہر پیشی کا خود یا بزرگیہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا، اگر پیشی پر من مظہر حاضر نہ ہوں اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پشہری کی کسی اور جگہ یا پشہری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام پشہری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا پشہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کوکل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کے روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپروائشی و راضی نامہ فیصلہ برخلاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منوشی ڈگری یکطرفہ درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختار نہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزوی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے دوسرے وکیل یا ایئر سٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کے ہر امر وہی اور ویسے ہی اختیارات حاصل ہوں گے جیسے کے صاحب موصوف کو حاصل ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ اور صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا کہ سند ہے۔


مورخہ: _____ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

NWFP Bar Council

ADVOCATE

JAVED IQBAL

Secretary's Signature



Father's Name: JAN, MUHAMMAD
 Address: VILL & P.O. GULBELA TEHSIL & DIST. PESHAWAR
 Office Tel: 214160 Res: 239319
 Enrolment Date L.C. 18/06/2005
 Place of Practice: PESHAWAR
 Date of Birth: 11/02/1980
 Blood Group: A+VE
 N.I.C. No. 137-80-681070
N.W.F.P. BAR COUNCIL
 Karachi Market, Baskarno Square, Peshawar. Phone: (091) 9211
 E-mail: nwfpbarcouncil@hotmail.com

لیدالت صاحب سرکل شریعتی غیر مختون خواہ لیسٹ

انڈیا دہلی ۰۱ ۹/۲۰۱۵

رہنہ سیم حکومت

درخواستیہ براد اجازت دینے بابت جمعہ رات سر دہلی جاؤں

صاحب علی:۔۔۔ سٹیٹ لیب ڈیر علیہ رسالہ

۱۔ یہ مقدمہ عنوان بالا عدالت حضور میں ازیم جوڑ ہے

جس میں تاریخ سیم ۵۹ کا ۱۵۵۱ قور ہے

۲۔ یہ مقدمہ عنوان بالا میں عدالت حضور میں سر دہلی جاؤں

اندر دس روپے میں جمعہ رات کا حکم صادر فرمایا تھا

لہذا اسٹیمپ لگانے سے اس میں مقدمہ عنوان بالا میں

سر دہلی جاؤں جمعہ رات کی اجازت دیا جاوے

Muhammad
J. 13.07.15

۱۲ ۰۷/۲۰۱۵ اظہار نوم

محمد عرفان نوری صاحب دہلی
۱۳/۰۷/۱۵

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Service Appeal No.595/2015.

Asif Ex- Constable No.5519 CCP Peshawar.....Appellant.

VERSUS.

1. Capital City Police Officer, Peshawar.
2. Superintendent of Police, Hqrs, Peshawar.
3. Superintendent of Police, Rural, Peshawar.
4. Deputy Superintendent of Police, Hqrs, PeshawarRespondents.

Reply on behalf of Respondents No. 1, 2, 3&4.

Respectfully Sheweth:-

PRELIMINARY OBJECTIONS.

1. That the appeal is badly time barred.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has not come to this Hon'able Tribunal with clean hands.
4. That the appellant has no cause of action.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appellant has concealed the material facts from Honorable Tribunal.
7. That this Hon'ble tribunal has no jurisdiction to entertain the appeal.

FACTS:-

1. Para No. 1 is not related hence needs no comments.
2. Para No.2 pertains to record hence needs no comments.
3. Para No. 3 pertains to record hence needs no comments.
4. Para No. 4 is for the appellant to prove.
5. Para No. 5 is correct to the extent that the appellant while posted at PS Badaber Peshawar absented himself willfully from his lawful duty w.e.f 17.11.2013 to 08.08.2014 (total 08 months and 21 days) without taking permission or leave. He was issued charge sheet and statement of allegation. In this regard , proper departmental proceedings were initiated against him through DSP Chamkani. He was also contacted on his mobile phone time and again to join the enquiry proceedings but he did not bother to appear before the E.O. As the charges of deliberate absence were stand proved against him hence he was recommended for ex-parte action. He was also issued FS which he received and replied but his reply was found unsatisfactory. He after fulfilling all codal formalities he was awarded major punishment of dismissal from service vide OB No.483 dated 06.02.2015 by SP Peshawar.
6. Para No.6 is correct to the extent that the appellant preferred a departmental appeal but after due consideration was rejected/filed because the charges were stand proved against him.

deliberate absence were stand proved against him. He was also heard in person in OR on 24.04.2015 but he failed to defend himself.

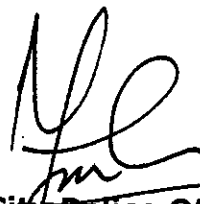
7. That appeal of appellant being devoid of merits may kindly be dismissed on the following grounds:-


GROUNDS:-

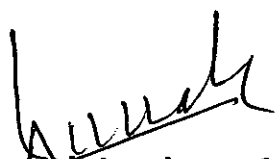
- A) Incorrect. The punishment order is in accordance with law/rules.
- B) Incorrect. Proper departmental enquiry was conducted against him by DSP Chamkani, Peshawar. He was also heard in person in OR on 24.04.2015 but he failed to defend himself.
- C) Incorrect. The appellant was awarded full opportunity to defend himself, he was contacted on his mobile phone but he did not bother to appear before the E.O. Moreover section 24A of the General Clauses Act was followed.
- D) Incorrect. The appellant was proceeded departmentally in accordance with law/rules.
- E) Incorrect. The punishment order is in accordance with law/rules.
- F) Respondents also seek permission of this Honorable Tribunal to raise additional grounds at the time of arguments.


PRAYER.

It is therefore most humbly prayed that in light of above facts and submissions, the appeal of the appellant being devoid of merits and legal footing, may kindly be dismissed.


Capital City Police Officer
Peshawar.


Superintendent of Police
HQs, Peshawar.


Superintendent of Police
Rural, Peshawar.


Deputy Superintendent of Police
HQs, Peshawar.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Service Appeal No.595/2015.

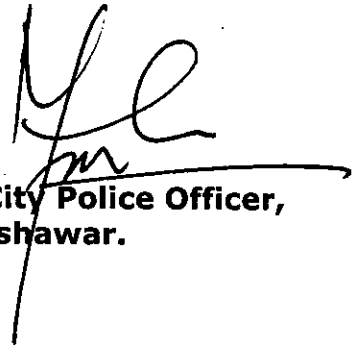
Asif Ex-Constable No.5519 CCP Peshawar..... Appellant.

VERSUS.

1. Capital City Police Officer, Peshawar.
2. Superintendent of Police, Hqrs, Peshawar.
3. Superintendent of Police, Rural, Peshawar
4. Deputy Superintendent of Police, Hqrs, PeshawarRespondents.

AFFIDAVIT.

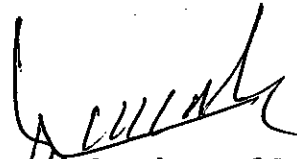
We respondents 1, 2 ,3 &4 do hereby solemnly affirm and declare that the contents of the written reply are true and correct to the best of our knowledge and belief and nothing has concealed/kept secret from this Honorable Tribunal.



**Capital City Police Officer,
Peshawar.**



**Superintendent of Police
HQrs, Peshawar.**



**Superintendent of Police
Rural, Peshawar.**



**Deputy Superintendent of Police
HQrs, Peshawar.**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 595/2015

ASIF

VERSUS

CCPO ETC

INDEX

S#	Description of documents	Page Nos
1	Rejoinder	1-3

Dated: 26/05/2016

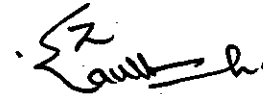
Appellant

Through

JAVED IQBAL GULBELA,

AMIR NAWAZ KHAN SHINWARI

&



MALIK ZIA ULLAH YOUSAFZAI

Advocate High Court Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 595/2015

ASIF

VERSUS

CCPO ETC

REJOINDER ON BEHALF OF THE APPELLANT TO THE
COMMENTS FILED BY THE RESPONDENTS

Respectfully Sheweth,

Reply to preliminary objections

1 to 7: The preliminary objections raised and taken by the respondents are unwarranted, misleading, baseless, wrong, and incorrect hence strongly denied. Not only the appellant has a strong locus standi, but has arrayed all the necessary parties thereto by concealing nothing from this Hon'ble Tribunal and this Hon'ble Tribunal has ample jurisdiction to entertain the instant appeal.

On Facts:

1 to 4:- Para No.1 to 4 of the comments are misleading, while true picture is detailed in the main appeal of the appellant.

5: Para No.5 of the comments is misleading, incorrect, concocted and is therefore, denied; True and detailed

picture is already been given in the corresponding paras of the main appeal.

6: Para No.6 of the comments is misleading and denied. A true picture is in the corresponding paras of main appeal.

7: Para No.7 of the comments is wrong and is therefore denied.

On Grounds:

- A. Para No. "A" of the comments is misleading and is therefore, denied. The punishment order is illegal, unlawful and void ab-initio and is liable to be discarded.
- B. Para No.B of the comments is wrong and misleading. Neither any proper inquiry was ever conducted, nor the appellant was ever allowed to defend himself properly.
- C. Para No.C of the comments is misleading and wrong; hence denied. A true picture is already detailed in the corresponding paras of the main appeal.
- D. Para No.D of the comments is misleading and is denied.
- E. Para No.E of the comments is wrong, incorrect, concocted and void ab-initio, hence denied.
- F. No comments.

It is therefore, humbly prayed that on acceptance of the instant rejoinder, the appeal of the appellant may very graciously be allowed as prayed for therein.

Appellant
Appellant

Through

Javed Iqbal Gulbela
JAVED IQBAL GULBELA,
Amir Nawaz Khan Shinwari
AMIR NAWAZ KHAN SHINWARI

&
Malik Zia Ullah Yousafzai
MALIK ZIA ULLAH YOUSAFZAI
Advocate High Court Peshawar

Affidavit;

I, do hereby solemnly affirm and declare on oath that all the contents of the instant rejoinder is true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble court.

Deponent
Deponent

ATTESTED



26-05-06

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No 607 /ST

Dated 21 /03/2018

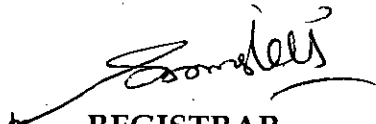
To

The Superintendent of Police, Rural,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: **ORDER/JUDGEMENT IN APPEAL NO. 595/2015, MR. ASIF.**

I am directed to forward herewith a certified copy of Judgment/Order dated 15/03/2018 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

OK

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No.827/2017

Date of Institution ... 03.08.2017

Date of Decision ... 27.02.2018

Muhammad Jan S/O Fazal Akbar,
Clinical Technician, Khyber Teaching Hospital,
Peshawar.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Health Department
Civil Secretariat, Peshawar & 13 others.

... (Respondents)

Mr. Nazir Ahmad,
Advocate

... For appellant.

Mr. Raza Paindakhel,
Assistant Advocate General

... For respondents.

MR. GUL ZEB KHAN

... MEMBER

MR. MUHAMMAD HAMID MUGHAL

... MEMBER

JUDGMENT

GUL ZEB KHAN, MEMBER. The aforesaid appeal dated 03.08.2017 has been lodged by Muhammad Jan, hereinafter referred to as the appellant, under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, against the Provisional seniority list of Clinical Technician Physiotherapy (BS-12) of the Health Department dated 30.03.2017 (received by the appellant on 10.04.2017) and against not taking any action on his departmental appeal filed on 05.05.2017 within the statutory period.

Learned counsel for the appellant argued that the appellant was appointed as Physiotherapy Assistant (BS-05) on regular basis on 22.03.1986 by the Dean PGMI