


FORM OF ORDER SHEET

Court of _____

Appeal No. 1111/2024

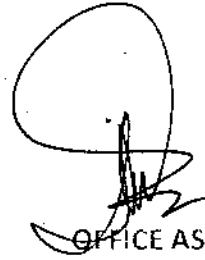
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/08/2024	<p>The appeal of Malik Yousaf Khan resubmitted today by Mr. Javed Iqbal Gulbela Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 09/08.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Malik Yousaf Khan received today i.e on 25.07.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexure-A of the appeal is illegible be replaced by legible/better one.
- 2- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with appeal be placed on it.

No. 473 /Inst./2024/KPST,

Dt. 26/07 /2024.

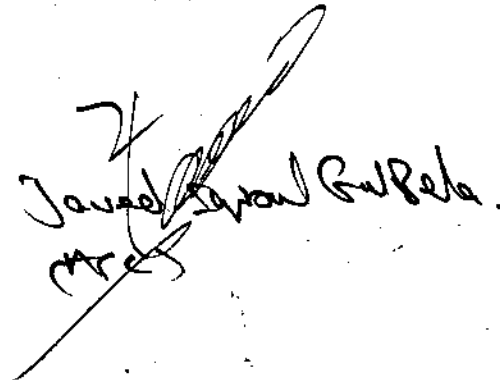


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Javed Iqbal Guibela Adv.
High Court Peshawar.

Respected Sir!

Re-submitted after removal of objection.
charge sheet, statement of allegations, show
cause Notice, enquiry report, &
statement of Appellant are attached at
page No. 27 to 32.


Javed Iqbal Guibela
Adv.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 1111 /2024

Malik Yousaf Khan

VERSUS

IGP KPK & Others

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Dated :24.07.2024

~~APPELLANT~~

THROUGH

JAVED IQBAL GULBELA
ADVOCATE, SUPREME COURT
PAKISTAN.

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 1111 /2024

(Constable)
Malik Yousaf Khan[†] (No.253 SSU/CPEC) S/o Malik Muhammad Zahoor
R/o Nasir Pur P/o Nasir Pur District Peshawar.

...APPELLANT

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
2. Commandant Special Security Unit (CPEC) Khyber Pakhtunkhwa, Peshawar.
3. Superintendent of Police Admin & Minority SSU (CPEC) Khyber Pakhtunkhwa, Peshawar.

...RESPONDENTS

Service appeal under section - 4 of the Khyber Pakhtunkhwa services tribunal act - 1974, against the Impugned office order No.525-36EC/SSU, Peshawar dated 22-02-2023, whereby appellant was dismissed from service and against the impugned office order No.3559-63/EC dated 11-04-2023, whereby the departmental of the appellant had been rejected by the respondent and against the impugned order No.S/1494/23 dated 05-06-2023, whereby the revision petition of the appellant had been also dismissed in a classical cursory and whimsical manner.

Respectfully Sheweth,

1. That after going through mandatorily required criteria, and after being envisaged with the ordeals and inquisition of selection process, the Appellant got inducted onto the rolls of the prestigious police force of the province, as constable.
2. That thereafter the Appellant took charge & with his most sincere and pragmatic way, performed his duties with full zest and devotion & never left any stone unturned in performance of his duties and have always won felicitations and appreciations of his High-up at certain junctures due to his

Mantle whetted skills, punctuality and behavior. The appellant performed various duties at different locations, including Abbottabad, Mansehra, Peshawar, Mardan and Upper Kohistan, with dedication and commitment.

3. That on 22-02-2023, an Impugned Order No.525-36 EC/SSU was issued by the office of the SP Admin & Minority SSU (CPEC) Khyber Pakhtunkhwa, where the appellant was dismissed from service on the ground of absence. **(Copy of the Impugned Dismissal Order No.525-36 EC/SSU dated.22-02-2023 is annexed as "A")**
4. That feeling aggrieved, the Appellant moved a Departmental Appeal Dated: 08-03-2023, which is officially communicated from the office of SP Admin & Minority SSU (CPEC) Khyber Pakhtunkhwa to The Worthy Commandant SSU (CPEC) Khyber Pakhtunkhwa, on 08-03-2023 against the impugned Dismissal Order No.525-36 EC/SSU to respondents office. Which had been rejected vide impugned office order No.3559-63/EC dated. 11-04-2023 by the office of Commandant Special Security Unit (CPEC) Khyber Pakhtunkhwa, Peshawar in a classical cursory and in whimsical manner. **(Copies of Departmental Appeal 08-03-2023 & Office letter dated 08-03-2023 And impugned Departmental Appeal Dismissal order No.3559-63/EC dated. 11-04-2023 are annexed as annexure "B, C & D")**
5. That thereafter feeling aggrieved from the impugned Departmental Appeal Dismissal order No.3559-63/EC dated. 11-04-2023, the Appellant preferred a revision petition before the office of Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar, which was also dismissed vide impugned Order No. S/1494/23 dated.05-06-2023. **(Copies of Revision petition and Impugned revision dismissal order No. S/1494/23 Dated: 05-06-2023 are annexed as annexure "E & F")**
6. That it is important to mention here, that the appellant and his family faces domestic issues/enmities, it is to be noted that the appellant family movies and file civil suit for enforcement their proprietary rights; due to which the appellant did not attend his duties and thus remain absent, and thus the appellant movies an application to consign/filed the inquiry against him. But even than the appellant was dismissed from service. **(copy of application is annexed as annexure "G")**
7. That feeling highly aggrieved and having no other remedy, the Appellant approaches this August Tribunal for recognition, acknowledgment and enforcement of his due rights and for reinstatement into service with all back benefits, upon the following grounds inter alia:-

GROUND:

- A. That the Appellant is a naturally born bona-fide citizen of Islamic Republic of Pakistan and is fully and equally, on equality basis, entitled to and basic

and fundamental rights on enshrined in the fundamental law of the land, interpreted, acknowledge, and enforced by the law of the land and any discrimination or unfettered exercise of discretionary powers public functionaries is always chucked away and chucked down by law and law court of the land.

- B. That it is a cherished principle of law that where a law requires a thing to be done in a particular manner, the same is to be done in that manner and not otherwise.
- C. That the impugned dismissal order as well as the impugned appellate & revisional orders are illegal, unlawful and void ab initio and liable to be struck down.
- D. That the impugned dismissal order is unwarranted, illogical and against the Rules so therefore not maintainable at all.
- E. That no proper inquiry was ever conducted in case of the appellant, nor the appellant was ever heard in person, nor was ever allowed to cross examine any witness and thus the appellant was condemned unheard.
- F. That not only the dismissal order from service is illegal, unlawful, void-ab-initio but the rejection of departmental appeals by the Respondents are also against the law and rules governing the subject, therefore not sustainable in the eye of law and need to be set aside in the best interest of justice.
- G. That the appellant belongs to a poor family, and is the only earning hand in the whole family to look after them.
- H. That from every angle the appellant is liable to be re-instated into service with all back benefits.
- I. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

It is, therefore most humbly prayed that on acceptance of the instant appeal, the Impugned office order No.525-36EC/SSU, Peshawar dated 22-02-2023, of the SP Admin & Minority SSU (CPEC) and the impugned office order No.3559-63/EC dated 11-04-2023 of the office of Commandant Special Security Unit (CPEC) Khyber Pakhtunkhwa, Peshawar, and the impugned order No. S/1494/23 dated 05-06-2023 of the Worthy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar, may kindly be set aside and by doing the appellant be reinstated into service with all back benefits.

Any other relief not specifically ask for may also graciously be extended in favor of the Appellant in the circumstances of the case.

Dated :24.07.2024

y. Iqbal Gulbela
(4)
APPELLANT

THROUGH

Javed Iqbal Gulbela
JAVED IQBAL GULBELA
Advocate Supreme Court
of Pakistan

Saghir Iqbal Gulbela
Saghir Iqbal Gulbela
Advocate High Court,
Peshawar

Almazeb Khan
Almazeb Khan
Advocate, Peshawar.

&
Muhammad Arif Mohmand
Advocate, Peshawar.

NOTE:

No such like service appeal for the same appellant upon the same subject matter has earlier been filed by me.

7
ADVOCATE
2

(5)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR


Yousaf Khan
VERSUS
IGP Khyber Pakhtunkhwa

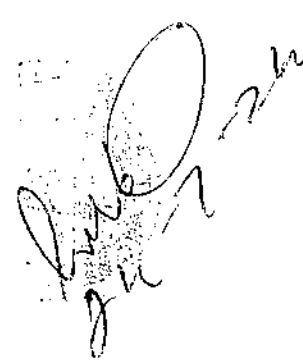
AFFIDAVIT

I, Yousaf Khan S/o Malik Muhammad Zahoor Khan R/o Nasir Pur P.O Nasir Pur Tehsil Chamakani District Peshawar, do hereby solemnly affirm and declare on oath that the contents of accompanied Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


DEPONENT

CNIC # 17301-5469481-5
Cell No. 0310-1414997

Identified by: 
Javid Iqbal Gulbela
ASC



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Civil Miscellaneous No. _____/2024

SERVICE APPEAL NO. _____/2024

Malik Yousaf Khan

VERSUS

IGP KPK & Others

APPLICATION FOR CONDONATION OF DELAY

RESPECTFULLY SHEWETH,

1. That the appellant is filling the accompanying Service appeal, the contents of which may graciously be considered as integral part of the instant application.
2. That the delay in filling the instant service appeal was not deliberate, but due to the appellant suffering from mental disease i.e. "major depressive disorder", and the appellant regularly under medical treatment, therefore the appellant was not in position to file the accompanying service appeal within time. (Copy of Medical Documents is annexed "H")
3. That law also favors adjudication on merits and technicalities of any sort must always be ignored while reaching a just and fair disposal of any lis.
4. That for proper disposal of the accompanying service appeal on its merits, the condonation of delay is indispensable.
5. That not only the appellant has got a good prima facie case and having balance of convenience in his favor, but would suffer irreparable loss, if the instant application is not allowed.

It is, therefore, most humbly prayed that on acceptance of the instant application, the delay in filing the accompanying Service appeal may graciously be condoned and the accompanying service appeal may very graciously be decided on its merits.

Dated :24.07.2024

Appellant

Through

Javed Iqbal Gulbena
Advocate, Supreme Court of
Pakistan.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Yousaf Khan
VERSUS
IGP Khyber Pakhtunkhwa

AFFIDAVIT

I, Yousaf Khan S/o Malik Muhammad Zahoor Khan R/o Nasir Pur P.O Nasir Pur Tehsil Chamakani District Peshawar, do hereby solemnly affirm and declare on oath that the contents of accompanied application of condonation of delay are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Yousaf Khan
DEPONENT

CNIC # 17301-5469481-5

Cell No. 0310-1414997

Identified by: *Javid Iqbal Gulbela*
Javid Iqbal Gulbela
ASC

Javid Iqbal Gulbela
24

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. _____ /2024

Malik Yousaf Khan

VERSUS

IGP KPK & Others

ADDRESSES OF PARTIES

ADDRESS OF APPELLANT

Malik Yousaf Khan (No.253 SSU/CPEC) S/o Malik Muhammad Zahoor
R/o Nasir Pur P/o Nasir Pur District Peshawar.

ADDRESSES OF RESPONDENTS

- 1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar**
- 2. Commandant Special Security Unit (CPEC) Khyber Pakhtunkhwa, Peshawar.**
- 3. Superintendent of Police Admin & Minority SSU (CPEC) Khyber Pakhtunkhwa, Peshawar.**

Dated :24.07.2024

Appellant

Through

Javed Iqbal Gulbela
Advocate, Supreme Court of
Pakistan.

9

Ann "A"
Original
Copy

**OFFICE OF THE COMMANDANT
SPECIAL SECURITY UNIT (SSU)
KHYBER PAKHTUNKHWA POLICE**

CENTRAL POLICE OFFICES, S.A.Q ROAD, PESHAWAR CANTT (P.N. CP-02/4056)

No. 36 EC/SSU,

dated Peshawar the 22/02/2023.

ORDER

This order will dispose the formal departmental inquiry against Constable Yousaf No. 253 of Special Security Unit (CPEC), District Peshawar.

Chief facts of the case are that as reported vide DD report No. 04, dated 25.10.2022 that Constable Yousaf No. 253 had absconded himself from his lawful duties w.e.f. 25.10.2022 till date without any sanctioned leave or intimation.

In this regard, his pay was stopped and proper departmental proceeding was initiated against him. He was issued charge sheet & summary of allegation vide this office Endst: No. 11797/EC, dated 05.12.2022 and Mr. Ibrahim Khan DSP Admin SSU (CPEC) was nominated as enquiry officer to conduct inquiry into the matter and submit findings report. After completion of all legal formalities, EO submitted his findings report, wherein he reported that the delinquent constable was summoned time & again to receive charge sheet and submit reply or appear before EO but he did not bother to do so. Thus, the EO recommended him for ex-parte action.

Later on he was issued/served with final show cause notice vide office No. 07/EC, dated 03.01.2023 to which he replied that he is suffering financially due to which he is unable to perform his duties at District Upper Kohistan. Also he was heard in OR in person on 17.02.2023 and was directed to report at his concerned posting place for his lawful duties but he absconded again, it means that he is not willing to continue his services more.

Keeping in view all the above facts as well as recommendation of enquiry officer & material available on record that the above named constable has deliberately absented himself from his lawful duties. Therefore, I, Superintendent of Police, Admin & Minority Wing SSU (CPEC), being the competent authority in the exercise of powers vested to me under section 5(4) of Khyber Pakhtunkhwa, Police Rules: 1975 (amended in 2014) hereby awarded major punishment of "Dismissal from Service" and his absence period w.e.f. 25.10.2022 till date is treated as leave without pay and the Accountant SSU HQrs: is directed to reckon & recover the amount if paid to him during his absence alongwith Basic Recruit Course charges accordingly.

ASST / S / EC
22/02/2023
22-02-2023
(FAZAL HANIF)
SP Admin & Minority SSU (CPEC),
Khyber Pakhtunkhwa, Peshawar.

Copy of the above is forwarded for information to the:

1. Accountant General, Khyber Pakhtunkhwa
2. Capital City Police Officer, Peshawar.
3. SSP HQrs: & Hazara SSU (CPEC).
4. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
5. Reader to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
6. Accountant, SRC, LO, OASL, I/C HRMS, I/C KOT and I/C Clothing Godown HQrs. SSU (CPEC).
7. Mr. Yousaf No. 253 S/O Malik Muhammad Zahoor Khan P/O Nasir Pur District Peshawar.

22-02-2023

[Handwritten signature]

BETTER COPY

**OFFICE OF THE COMMANDANT SPECIAL SECURITY UNIT (SSU)
KHYBER PAKHTUNKHWA POLICE
CENTRAL POLICE OFFICE, S.A.Q ROAD, PESHAWAR CANTT (PH:091-9214056)**

No. EC/SSU

Dated Peshawar the 22/02/2023.

ORDER

This order will dispose the formal departmental inquiry against Constable Yousaf No. 253 of special Security Unit (CPEC), District Peshawar.

Brief Facts of the case are that as reported vide DD report No.04, dated 25/10/2022 that Constable Yousaf No.253 had absented himself from his lawful duties w.e.f 25.10.2022 till date without any sanctioned leave or intimation.

In this regard, his pay was stopped and proper departmental proceeding was initiated against him. He was issued charge sheet and summary of allegation vide this office Endst: no 11797/EC, dated 05.12.2022 and Mr. Ibrahim khan DSP Admin SSU (CPEC) was nominated as enquiry officer to conduct inquiry in to the matter and submit findings report. After completion of all codal formalities, EO submitted his finding report, wherein he reported that the delinquent Constable was summoned time and again to receive charge sheet and submit reply or appear before EO but he did not bother to do so. Thus, the EO recommended him for ex- party action.

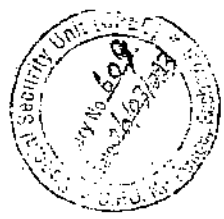
Later on he was issued/served with final show cause notice, vide office No. 07/EC, dated 03.01.2023 to which he replied that he is suffering financially due to which he is unable to perform his duties at District Upper Kohistan. Also he was heard in OR in person on 17.02.2023 and was directed to report at his concerned posting place for his lawful duties but he absconded again, it means that he is not willing to continue his service more.

Keeping in view all the above facts as well as recommendation of enquiry officer and material available on record that the above named constable has deliberately absented himself from his lawful duties. Therefore, I, Superintendent of Police, Admin and Minority Wing SSU(CPEC), being the competent authority in the exercise of powers vested to me under section 5(4) of Khyber Pakhtunkhwa, Police rules, 1975 (amended in 2014) hereby awarded major punishment of **“Dismissal from Service”** and his absence period w.e.f 25.10.2022 till date is treated as leave without pay and the Accountant SSU HQrs: is directed to reckon and recover the amount if paid to him during his absence along with Basic Recruit Course charges accordingly.

JAVED Iqbal GUL BELA
Sd/-
Supreme Court of Pakistan
(MSC H 5217)

10

Ann "B"



To,
The Commandant SSU (CPEC) DIG,
Khyber Pakhtunkhwa Police, Peshawar.

**Subject: - DEPARTMENTAL APPEAL AGAINST THE ORDER
NO. 525-36 EC/SSU DATED 22.02.2023 WHEREBY THE
APPELLANT WAS DISMISSED FROM SERVICE.**

Respected Sir

It is stated that the appellant was an employee of your good self-department and was performing his duty quite efficiently and up to the entire satisfaction of his superior.

That during service the appellant was charge sheeted for absence on 05/12/2022 to which the appellant responded by submitting his detail reply wherein he clarified the stance.

That due to financially problems, I can't continue my duty at upper Kohistan and I am suffered already with loan. That after the submitting of reply the appellant was quite hopeful for exoneration from the charge mention in the charge sheet but astonishingly vide impugned order dated 22/02/2023. The appellant was dismissed from service for the alleged absence.

11

That before the issuance of impugned order no regular inquiry has been conducted into the matter and no right of personal hearing and personal defense has been provided to the appellant, he is condemn unheard.

That since his appointment no complaint whatsoever had been lodged against the appellant which manifest has devotion of duty.

That no opportunity has been provided to the appellant to clarify his stance.

Dear sir, I am very shameful from this act and I promise to avoid this type of act and absence in future. It is therefore most humbly prayer that on acceptance of instant departmental appeal the impugned order dated 22/02/2023 may kindly be a set aside and the appellant may please be reinstated into service with all back benefits.

SP/Ad'mn

EC

Your Sincerely;

for n/action as per rules

Malik Yousaf Khan
Belt No. 253(SSU)CPEC
NIC No. 17301-5469481-

Ceill No.0310-1414997

08/03/23

SP/A
08/03/23

Comdt. SSJ

Handwritten signature

(12)

Ann "C"

From: SP Admin & Minority SSU (CPEC),
Khyber Pakhtunkhwa, Peshawar.

To: Worthy Commandant SSU (CPEC),
Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER NO. 525-36/EC/SSU
DATED 22.02.2023 WHEREBY THE APPELLANT WAS DISMISSED
FROM SERVICE.

Memo:

Kindly refer to the subject cited above.

Brief fact of the case are that Constable Yousaf No. 253 had absented himself from his lawful duties w.e.f. 25.10.2022 till date without any sanctioned leave or intimation.

Resultantly, proper departmental proceeding was initiated against him. He was issued charge sheet & summary of allegation vide this office Endst: No. 11797/EC, dated 05.12.2022 and Mr. Ibrahim Khan DSP Admin SSU (CPEC) was nominated as enquiry officer to conduct inquiry into the matter and submit findings report. After completion of all codal formalities, EO submitted his findings report, wherein he reported that the delinquent constable was summoned time & again to receive charge sheet and submit reply or appear before EO but he did not bother to do so. Thus, the EO recommended him for ex-parte action.

Later on he was issued served with final show cause notice vide office No. 07/EC, dated 03.01.2023 to which he replied that he is suffering financially due to which he is unable to perform his duties at District Upper Kohistan. Also he was heard in OR in person on 17.02.2023 and was directed to report at his concerned posting place for his lawful duties but he absconded again, it means that he is not willing to continue his services more.

Keeping in view all the above facts as well as recommendation of enquiry officer & material available on record, the above named constable had deliberately absented himself from his lawful duties. Therefore, I, Superintendent of Police, Admin & Minority Wing SSU (CPEC), being the competent authority in the exercise of powers vested to me under section 5(4) of Khyber Pakhtunkhwa, Police Rules 1975 (amended in 2014) awarded him major punishment of "Dismissal from Service" and his absence period w.e.f. 25.10.2022 till date was treated as leave without pay.

Submitted for your kind perusal & appropriate order, please.

(FAZAL HANIF)

SP Admin & Minority SSU (CPEC),
Khyber Pakhtunkhwa Peshawar.

to be filed please
23/03/23

No. 253 / EC

dated the Peshawar 28/03/2023.

13

Ann "D"
Impugned
Orders



**OFFICE OF THE COMMANDANT
SPECIAL SECURITY UNIT (SSU)
KHYBER PAKHTUNKHWA POLICE**



CENTRAL POLICE OFFICES, S.A.Q ROAD, PESHAWAR, CANTT (PH: 091-9214056)

No. 3559-63 /EC,

dated Peshawar the 11/10/2023.

ORDER

This order will dispose of the formal departmental appeal preferred by ex-constable Yousaf No. 253 of Special Security Unit (CPEC) against the order of SP Admin SSU (CPEC), wherein he was awarded major punishment of "Dismissal from Service" on the allegations that he remained absent from his lawful duties w.e.f. 25.10.2022 till date.

In this regard, proper departmental inquiry was carried out. He was issued/served charge sheet and summoned time & again to submit reply and appear before EO for personal hearing but he badly failed to do so. Thus the EO recommended him for ex-parte action.

Later on he was issued/served with final show cause notice, to which he replied that he is suffering financially due to which he is unable to perform duties at District Upper Kohistan. He was heard in OR in Person by SP Admin & Minority SSU (CPEC) but badly failed to prove himself innocent of the charges leveled against him.

In the light of recommendation of enquiry officers and other material available on the record, he was awarded major punishment of "Dismissal from Service" and his absence period w.e.f. 25.10.2022 till date was treated as leave without pay.

Feeling aggrieved against the impugned orders of SP Admin & Minority SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 08.03.2023.


During the course of personal hearing, the applicant failed to prove himself innocent. From perusal of enquiry file it has been found that the allegations were fully established against him by the Enquiry Officer during the course of enquiry. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on findings narrated above, I, Commandant SSU (CPEC), Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.


Order announced.

OB No. 429

Dated 11/10/23


(MOHAMMAD ZAFAR ALI)^{PSP}
COMMANDANT,
Special Security Unit (CPEC),
Khyber Pakhtunkhwa, Peshawar

- Copy of the above is forwarded for information to the:
1. SP Admin & Minority SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
 2. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
 3. Reader to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
 4. Ex-Constable Yousaf No. 253.



محضور جناب انسپکٹر جنرل آف پولیس خیبر پختونخوا پشاور

11942 / SB جناب صاحب

گزارش ہے کہ سال 2019 میں محکمہ پولیس میں بطور سپاہی ETEA کے ذریعے بھرتی ہوا ہے جس کو بعد میں سپیشل سیکورٹی یونٹ میں شامل کر دیا گیا تھا۔ سالانہ پیرا لیٹل سائنس پاس ہے اور پی ٹی سی، گلو سے ریکروٹ کورس کو ایڈوانس بھی ہے سالانہ سپیشل سیکورٹی یونٹ میں مختلف جگہوں پر ڈیوٹی خوب دلجوئی کے ساتھ سرانجام دی ہے جس میں ایبٹ آباد، مانسہرہ، پشاور، مردان اور اپر کوہستان اس کے علاوہ سالانہ ایک غریب خاندان سے تعلق رکھتا ہے جس کے گھر کا سربراہ نہیں ہے سالانہ کے مسائل کافی محدود ہیں اور باوجود اس کے سالانہ ہر قسم کی ڈیوٹی سے دریغ نہیں کیا اور آڈٹ دستک ڈیوٹی بھی افسران بالا کا حکم سچ کر کے ہے جس کی وجہ سے سالانہ کافی مقدمات بھی ہو اس سال ایک دن ڈیڑھ گھنٹہ کا OASI دفتر سے کال آئی کہ تمہارا نام ATS کورس کے لیے منتخب کیا گیا ہے اسی دن سے سالانہ اپنے آپ کو میٹنگلی اور فزیکلی تیار کر لیا تھا لیکن 2-3 دن میں روانگی کا مسئلہ آگیا تھا جس کی وجہ سے میری مالی حالت نامناسب تھی میرے اس وقت 4 بچے ہیں جن میں سے 2 سکول جاتے ہیں اور 2 چھوٹے ہیں لیکن اس کے باوجود میں اپنی تنخواہ کے آدے سے زیادہ ہمدردیوں کی نہیں اور گھر کے خرچے کے لیے دیے باقی میں نے اپنے خرچے کے لیے رکھ دیے لیکن جو نئی ہم سہلی ڈیم اسلام آباد پہنچے تو وہاں پر گراؤنڈ فیس، مس خرچہ وغیرہ کافی زیادہ تھا جس کی وجہ سے میں مجبوراً واپس آگیا اور افسران بالا سے التجا کی کہ میری موجودہ مالی حالت کافی خراب ہے مجھے دوسرے ٹرم میں بھیج دیا جائے تو بہتر ہو گا جو کہ افسران بالا نے میری درخواست پر غور کیے بغیر میری اس حرکت کو حکم کی خلاف ورزی سمجھا کر اس کے برعکس میرا افسران پر کوہستان کر دیا جو کہ سراسر زیادتی کی اس کے بعد میں نے Accountant SSU سے درخواست کی قرضہ کے لیے تاکہ میں مجبوراً ATS کورس کے لیے چلا جاؤں میں نے اپنے بچوں کو بے یار و مددگار چھوڑ کر افسران بالا کی حکم کی تعمیل کرنا چاہی لیکن Accountant SSU نے منہ توڑ جواب دیا کہ موجودہ ہمارے پاس کسی قسم کا فنڈ نہیں ہے جس کا مسئلہ آج تک چل رہا ہے اس کے علاوہ میں نے پھر بھی افسران کا حکم مان کر اپر کوہستان میں حاضری کی لیکن میں کافی مقدمات بھی ہو چکا تھا اور افسران بالا نے دوسری طرف میری تنخواہ بھی بند کر دی تھی جس کی وجہ سے مجبوراً واپس آنا پڑا افسران بالا نے میری ایک ناستی اور مجھے بار بار شوکار دیتے رہے جس کا جواب میں جمع کرنا اور ساتھ میں رحم اور مدد کی اپیل بھی کرتا رہا لیکن آخر کار مجھے محکمہ پولیس سے درخواست کر دیا گیا اس کے باوجود محکمہ پولیس سے محبت و شفقت رکھتے ہوئے میں نے Commandant SSU کو دوبارہ بحالی اور افسران بالا کے ہاں پیش ہونے کے لیے درخواست کی لیکن ان کے باوجود افسران بالا نے بنا حکم کے میری دوبارہ بحالی کی درخواست بھی رد کی اور ساتھ میں اردنی روم میں پیش ہونے کی اجازت بھی نہیں دی۔ 2019 کے ETEA ٹیسٹ میں میرے نمبر 4 تھے یہ تھا کہ محکمہ پولیس کے ساتھ شوق کی وجہ سے آیا تھا اس کے علاوہ میں اب بھی ہر قسم کے کورس کرنے کا خواہش مند ہوں مشکل سے مشکل کیوں ناہو اور ہر قسم کی ڈیوٹی کے لیے تیار ہوں اور فزیکل فٹ بھی ہوں۔

آپ صاحبان سے گزارش کی جاتی ہے کہ سالانہ کی درخواست کو منظور فرما کر مسائل کو دوبارہ محکمہ پولیس میں بیک پیکیٹ کے ساتھ آنے کا موقع دیا جائے سالانہ

حیات دعا گو رہے گا۔

العارض

آپکا تابع فرمان کنسٹیبل محمد یوسف بلٹ نمبر 253 ایس ایس پی سی بیک خیبر پختونخوا پشاور

0310-1414997

محمد یوسف

دستخط



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

No. S/ 1494 /23, dated Peshawar the 05/06/2023.

To : The Commandant,
Special Security Unit (CPEC),
Khyber Pakhtunkhwa, Peshawar.

Subject: - REVISION PETITION.

Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-FC Muhammad Yousuf No. 253 of Special Security Unit, CPEC, against the penalty of dismissal from service awarded by SP/Admin & Minority SSU (CPEC) vide OB No. 257, dated 22.02.2023 being badly time barred.

The applicant may please be informed accordingly.

(Signature)
5/6/23
(AFSAR JAN)

Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

(Handwritten initials)
05/06/23

15
Ann "F"
Circled
Recd - Special
Director

(Handwritten initials)

(16)

Ann '5'

Registration
Punjab

بخدمت جناب ڈپٹی کمشنر صاحب (SSU) سی پیک پشاور
درخواست بمراد روائہ بابت تزیلی سزا

جناب عالی!

بجوالہ مشمولہ آرڈر نمبر 402 مورخہ 21-06-2022 معروض خدمت ہوں کہ من مسائل نے بوجہ
خاندانی مسئلہ اراضی کے مکان خود چھوڑ کر مردان اور بعد از ضلع سوات میں رشتہ داران کے ہاں مقیم رہ کر اسی عرصہ
میں اپنے جائز ڈیوٹی سے غیر حاضر ہو اراضی تنازعہ خانی کے ساتھ بعد الت جناب احمد مجتبیٰ کمال سینئر سول جج پشاور
میں زیر سماعت ہے جس کی حالیہ آرڈر کاپی لفدہ ہذا ہے جس کی نسبت انکو آفری آفسر صاحب کو تمام دستاویزات ثبوت
فراہم کئے ہیں جس کے باوجود بھی من مسائل کو دوہری سزا عرصہ حاضر بلا تنخواہ اور سالانہ ایک انگریمنٹ کے روکنے کا
حکم کیا ہے۔ آرڈر کاپی لفدہ ہذا ہے۔

لہذا استدعا ہے کہ من مسائل کے جملہ انکو آفری پیپر ز پر نظر ثانی فرما کر مزید حکم سزا میں ترمیم کی
جائے من مسائل آئندہ کسی بھی قسم کی غفلت اور غیر حاضری سے اجتناب کرے گا اور دوبارہ آپ صاحبان کو کسی بھی
قسم کی شکایت کا موقع نہیں دیگا۔ چونکہ مسائل ایک غریب گھرانے سے تعلق رکھتا ہے اسی لئے آپ صاحبان سے
درخواست کی جاتی ہے کہ من مسائل کی سزا پر نظر ثانی فرمائیں۔ مسائل ہمیشہ دعا گو رہے گا۔

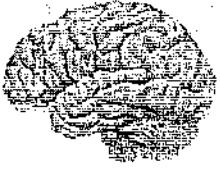
العارض
محمد یوسف خان

کنستبل ملک یوسف خان

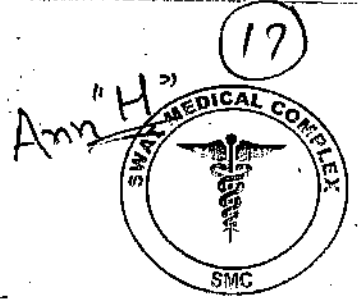
پلاٹ نمبر 253

شناختی کارڈ نمبر: 5-5469481-17301

تاریخ: 06-07-2022



Dr. Ashfaq Hussain
 Consultant psychiatrist
 MBBS, DCP (Ireland), FCPS (Psychiatry)



Maslat Gousuf Khan

3rd July, 2024

Tab VENDEP XR 75mg

1 + 1

Dr Ashfaq

SWAT MEDICAL COMPLEX
 SWAT
 17/07/2024

Moham Jassaf Khan

3rd July, 2024

A. Major depressive disorder

Flup

Much better

- Denying active symptoms

- Biological functions → ok

JAVED IQBAL GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

Plan

(1) Stopping olanzapine

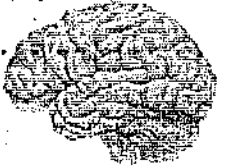
(2) Patient counselled about

the importance of continuing meds
for three more months.

(3) Advised on healthy life style
and staying fit.

(4) Safety nets and warning signs
explained.

18



Dr. Ashfaq Hussain
Consultant psychiatrist
MBBS, DCP (Ireland), FCPS (Psychiatry)

7th March, 2024

Molali Yousuf Khan

Teb VENDEP XR 75mg

سب 1 + 1

Teb CLEPRA 5mg

سب x 1 (1/2)

Ashfaq
Dr. Ashfaq

SWAT MEDICAL COMPLEX
Faizabad Road, Saidu Sharif, Swat, Pakistan

SWAT MEDICAL COMPLEX

Faizabad Road, saidu Sharif, Swat, E-mail: Swatmedicalcomplex@gmail.com

ایڈوانس نمبر کیلئے صبح 9 بجے سے 10 بجے تک فون نمبر 0344-5975868 پر رابطہ کریں

چھٹی بروز اتوار

Malak Jousuf Khan

7th March, 2024

Flup

Δ Major depressive disorder.

Compliance: Good

doing well than before

Reporting Some improvement.

denying thoughts of self harm / harm to others.

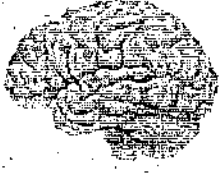
Sleep ✓

Appetite ✓

Plan: Same treatment

INTERNATIONAL GULBELA
D. Gulbela
District Registrar
(ASO # 5317)

19



Dr. Ashfaq Hussain
Consultant psychiatrist
MBBS, DCP (Ireland), FCPS (Psychiatry)



M. Yousuf Khan

20th May, 2024

Tab VENDEF XR 75mg

Tab + 1 + 1

Tab OLERA 5mg

Tab + 1, (1/2)

Dr. Ashfaq

Dr. Ashfaq

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SWAT MEDICAL COMPLEX

Faizabad Road, saidu Sharif, Swat, E-mail: Swatmedicalcomplex@gmail.com

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چھٹی بروز اتوار

Malik Javaf

20th May, 2024

Flup

Δ Major Depressive disorder

Mood → brighter and reactive

Energy levels → ok

has started exercise

is worried about his prospects

Sleep ✓

Appetite ✓

Libido ✓

Impression: In Remission

Plan: Stopping olanzapine next review

JAVED ICEAL BULBUL
Supervisor
Supreme Court of Pakistan
(SC/11/11)

Dr. Asif Iqbal

M.D.S., M.C.S., F.C.S. (Medicine)



Dr. Asif Iqbal

Medical Specialist
& Nephrologist
Police & Services Hospital Peshawar

Name: Malak Yusuf Sex: M Date: 18/6/23

Clinical Record

Low Blood

Pressure

Normal

Artery

① L. Renal

② Normal of
arterial

③ L. medial of

④ L. Renal of
artery

[Handwritten signature]



Dr. Asif Iqbal

Medical Specialist
& Nephrologist
Police & Services Hospital Faisalabad



ڈاکٹر اسف ایقبال
متخصص کلیہ کلیہ
(نفری و کلیہ کلیہ)
ہسپتال پولیس و سروسز
فیصل آباد

Name: Yusuf wt: _____ Age: _____ Sex: M Date: 28-7-22

Clinical Record

DL
Insane
Aggressive
Bhauw

PA paroxyl CR
20 23 51 28 f

NT
NS

to treatment of
23 51

3 11
H. Lumbax

5 11
3 8

[Signature]

[Signature]

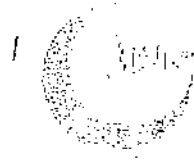
Dr. Asif Iqbal

M.B.S., M.C.P.S., F.C.P.S. (Medicine)

Medical Specialist

& Nephrologist

Police & Services Hospital Peshawar



ڈاکٹر اسف اعظمی

مدرسہ تعلیمی

پولیس و سروس ہسپتال

پشاور

پشاور

Name: Malak Yusuf Age: _____ Sex: M Date: 18/9/23

Clinical Record

DI

Insomnia

Odd Behavior

① Le benzyl
citer 3/25

② Zol. Dormicum
2.5g

③ Zol. Beufol

④ Zol. Beufol

اسف

Signature

23



Dr. Ashfaq Hussain

Consultant psychiatrist

MBBS, DCP (Ireland), FCPS (Psychiatry)

Mohale Yousuf Khan 30 yrs

2nd Oct, 2023

Cap Co-DEPRICAP 6/25mg

کریک + ۲۵۰ (۱)

Allen

SWAT MEDICAL COMPLEX
FAIZABAD ROAD SAIDU SHARIF
SWAT

SWAT MEDICAL COMPLEX

Faizabad Road ,saidu Sharif , Swat , E-mail : Swatmedicalcomplex@gmail.com

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Malak Yousuf Khan Adult Male

From Peshawar

Worried and apprehensive

Currently residing in Swat

Sad mood

- Ex-policeman

Weeping Spells

• Father of (3)

Extrem lethargy

• Denying substance misuse

hopeless, thinking of suicide

(denying active planning)

Past history:

Poor Concentration

Not Significant

Impulsivity

Family history

~~Anger out bursts - & regrets after words~~

strongly positive

Insomnia

Mother's mood
Siblings' disorder

decreased appetite

Bowels: ind water works ✓

Duration: Many months

Red over last few weeks.

Δ Major depressive disorder without psychotic disorder.

JAVED HEGAL
M.D. Psychiatrist
Supervisor of Psychiatrist
(ASD#5357)

24



Dr. Ashfaq Hussain
Consultant psychiatrist
MBBS, DCP (Ireland), FCPS (Psychiatry)



Mohale Hussain

D

for recovery of memory

with a...

...

...

...

...

SWAT MEDICAL COMPLEX
SWAT
2017

SWAT MEDICAL COMPLEX

Faizabad Road ,saidu Sharif , Swat , E-mail : Swatmedicalcomplex@gmail.com

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چھٹی بروز اتوار

History

1st Op.

History. No change in symptoms rather

worsening

of Depressive Cognitions, thinking of suicide

complaints & medicines.

↳ major side effects.

Discussion:

→ worried about his and his family prospects after losing his job

Plan:

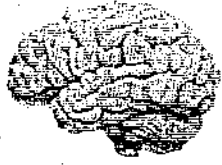
Advised admission (refused).

↳ Risk explained to patient and his sister.

↳ Sister promised that she will keep a check on him.

IMRAN ALI GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

25



Dr. Ashfaq Hussain
Consultant psychiatrist
MBBS, DCP (Ireland), FCPS (Psychiatry)



Melak Yousuf 4th January, 2024

Tob Vender: 2R 75mg

1 + 1

Tob OLEPRA 5mg

1 + 1 (1/2)

A. Hussain

SWAT MEDICAL COMPLEX
SWAT
FAIZABAD ROAD, SAIDU SHARIF

SWAT MEDICAL COMPLEX

Faizabad Road, saidu Sharif, Swat, E-mail : Swatmedicalcomplex@gmail.com

چھٹی بروز اتوار

ایڈوانس نمبر کیلئے 9 بجے سے 10 بجے تک فون نمبر 0344-5975868 پر رابطہ کریں

Malak Jassaf

F/UP Δ Major depressive disorder

Mood brighter than before.

but still some episodes of hopelessness and anxiety about his prospects.

denying suicidal thoughts/plans

sleep ✓

Appetite ✓

Plan: Continue same treatment.

DATE: 10/10/2014
BY: [Signature]
STATE: [Signature]

وکالت نامہ

بعدالت: جسٹس جعفر کھٹک، سروس ٹریڈیونل اینڈ اور

لوسٹر خان نام حکومت و خیر

منجانب ایپلنٹ دعویٰ سروس ایپل

تاریخ 24/07/2024

بابت: حویر آنکھہ مقدمہ مندرجہ بالا عنوان اپنی طرف سے واسطے پیروی و جوابدہی

بمقام کپٹن سجاد اور کیلے جاوید اقبال گل بیلہ ایڈووکیٹ سپریم کورٹ آف پاکستان

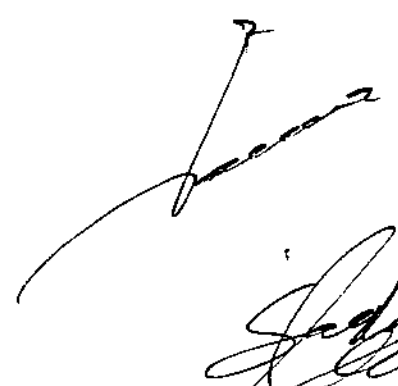
کوہدیں شرط وکیل مقرر کیا ہے۔ کہ میں ہر پیشی کا کوڈ یا بزرگیہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر الدت کرونگا، اگر پیشی پر من مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہونگے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کی کسی اور جگہ یا پکھری کے مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے۔ اگر مقدمہ علاوہ صدر مقام پکھری کے کسی اور جگہ ساعت ہونے یا بروز تعطیل یا پکھری 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 ہونگے۔ مجھے کوکل پر داخستہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب کو عرضی دعویٰ و جواب دعویٰ اور درخواست جرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے 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 پر خلاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کٹرفہ درخواست حکم انتہائی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادا ایگی علیحدہ مختار نہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کارروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے دوسرے وکیل یا بیرسٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کے ہر امر وہی اور ویسے ہی اختیارات حاصل ہونگے جیسے کے صاحب موصوف کو حاصل ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جانہ اتواء پڑے گا۔ اور صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کرونگا 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 سندر ہے۔

مورخہ 24/07/2024 مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

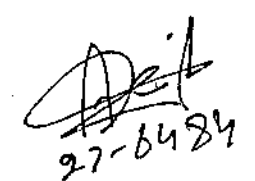
M. Arif M. Arif
Syed Jazib Mungar,
Waleed Ahmed Khalil.

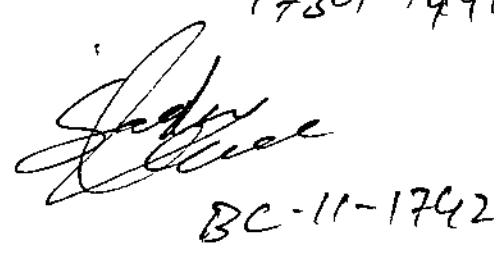
Alim zeb, Saghir Lalral, Javed Lalral

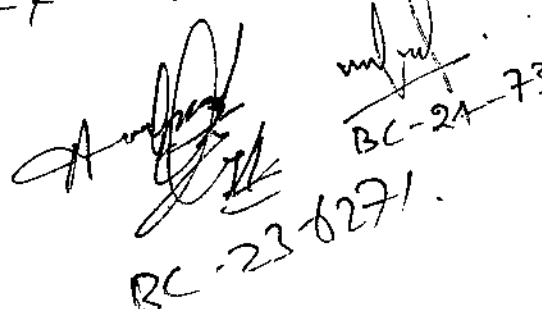
ایڈووکیٹ سجاد اقبال گل



BC-10-7924
0345-9405502
17301-1496065-7


27-6484


BC-11-1742


BC-24-73
BC-23-6271

CHARGE SHEET

I, Superintendent of Police, Admin & Minority Wing, Special Security Unit (CPEC), Peshawar, as competent authority, hereby charge that Constable Yousaf No. 253 of SSU (CPEC), District Peshawar with the following irregularities.

"That you Constable Yousaf No. 253 while posted at District Upper Kohistan had absented yourself from your lawful duty w.e.f. 25.10.2022 till date without any leave or permission of the competent authority, received vide DD report No. 04, dated 25.10.2022 from DSP SSU (CPEC), Hazara Region. This amounts to gross misconduct on your part and is against the discipline of the force."

You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the Enquiry Officer committee, as the case may be.

Your written defence, if any, should reach the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person.
A statement of allegation is enclosed.

(FAZAL HANIF)

SP Admin & Minority SSU (CPEC),
Khyber Pakhtunkhwa Peshawar.

02-12-22

JAVED USMAN GULBEGA
Advocate
Supreme Court of Pakistan
(ASC # 5217)

Disciplinary Action

I, Superintendent of Police, Admin & Minority, Special Security Unit (CPEC) Peshawar as a competent authority, am of the opinion that Constable Yousaf No. 253 of SSU (CPEC), District Peshawar has rendered him-self liable to be proceeded against under the provision of Police Disciplinary Rules-1975.

STATEMENT OF ALLEGATION

"That Constable Yousaf No. 253 while posted at District Upper Kohistan had absented himself from his lawful duty w.e.f. 25.10.2022 till date without any leave or permission of the competent authority, received vide DD report No. 04, dated 25.10.2022 from DSP SSU (CPEC), Hazara Region. This amounts to gross misconduct on his part and is against the discipline of the force."

For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and DSP Admin SSU (CPEC) is appointed as enquiry officer.

1. The Enquiry Officer shall, in accordance with the provisions of the Ordinance, provide reasonable opportunity of hearing to the accused officer, record his finding within 15 days of the receipt to this order, make recommendations as to punishment or other appropriate action against the accused.

2. The accused shall join the proceeding on the date time and place fixed by the Enquiry Officer.

(FAZAL HANIF)

SP Admin & Minority SSU (CPEC),
Khyber Pakhtunkhwa Peshawar.

No. 11797 /EC, dated Peshawar the 05/12 2022.

02-12-22

1. DSP Admin SSU (CPEC), Peshawar is directed to finalize the aforementioned departmental proceeding within stipulated period under the provision of Police Rules-1975.

2. Official Concerned.

JAVEED MOBAR GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

FINAL SHOW CAUSE NOTICE

I, Superintendent of Police, Admin & Minority, Special Security Unit (CPEC), Peshawar, as competent authority, under the provision of police Disciplinary Rules 1975 do hereby serve upon you, Constable Yousaf No. 253 of SSU (CPEC) final show cause notice.

The Enquiry Officer, DSP Admin SSU (CPEC), after completion of departmental proceedings, has recommended ex-parte action for you constable Yousaf No. 253 as the charges/allegations leveled against you in the charge sheet/statement of allegations.

And whereas, the undersigned is satisfied that you Constable Yousaf No. 253 deserve the punishment in the light of the above said enquiry reports.

I, competent authority, have decided to impose upon you the penalty of minor/major punishment under police Disciplinary Rules-1975.

1. 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.

2. If no reply to this notice is received within 07 days of its receipt, in normal course of circumstance, it shall be presumed that you have no defense to put in and in that case as ex-parte action shall be taken against you.

(FAZAL HANIF)
SP Admin & Minority SSU (CPEC),
Khyber Pakhtunkhwa Peshawar.

No. _____ /EC dated Peshawar the 03 / 01 /2023.

Copy to official Concerned.

JAYESH KOBAL GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5217)

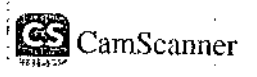
FR 22 of application

Jal
03/01/23

جناب عالی! بچہ شرمناز نوٹس معسر دہن خدمت میں کہ سائل کو 2 شہادتوں کو چارج شیٹ جاری ہوئی جس میں سائل سے بدستور وغیرہ جانچ ہونے کی وجہ پوچھی گئی۔ سائل نے یہ خبر سنا کر کافی غصہ کیا اور سائل نے اپنے گھر پر (6) ماہ تک گزارا لیکن جس میں ماہ جون آگت ستمبر اکتوبر نومبر اور جنوری شام ہیں۔ اس سلسلے میں سائل کو چارج شیٹ نہیں، ایذا جواب جمع کروا چکا ہے۔ تمام دستاویزات ہونے کے باوجود بھی سائل کے خلاف ایک طرفہ کارروائی کی گئی اور ایک چارج شیٹ میں سائل کو دوبارہ سزا (ایک سالہ اینٹرنیشنل اور 6) دن لایف ٹائم کیلئے دیا گیا ہے جسے خلاف سائل نے جناب ڈپٹی کمشنر صاحب کو بابت تفریحی سزا کی اپیل کی جس پر کوئی خاطر خواہ جواب نہ مل سکا۔ دوران تفریح بندش سائل ایس۔ ایس۔ پی بیڑ خوار شریف ڈیوٹی کر رہا ہے۔ ATS فورس سے واپسی کی صورت میں سائل کو پیرکوستان ٹرانسفر کر دیا گیا سائل کو 69-CR پوائنٹ پیر ڈیوٹی کر رہا ہے۔ تقریباً 15 دن تک سائل اپنے جیب سے اور قمیض سے کر ڈیوٹی کر رہا ہے۔ جیب دیال پیر (ایرکوستان) میں جیب فزج ختم ہو گیا تو سائل نے جناب ایس۔ پی صاحب کو پیشگی اور ساری امور عالی سے آگاہ کیا جس پر جناب ایس۔ پی صاحب نے اکاؤنٹ بلیغ سے مبلغ (5000) روپے بطور تفریح

Account No: SDC 2101, Gov. SSL (CPFC), Khyber Pakhtunkhwa Peshawar

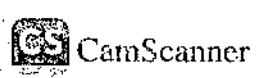
36/12/2024
 10:00 AM
 2024/09/11



بیان آراء کونسلین پروفیسر خان غیسر باب ۵۰۵

جناب عالی! بخواہ شوقاً از نو اس معرودان خودت ہوں کہ مسائل کو حل کر دو اور پورے کو چارج شیٹ بنادی ہوتی جس میں مسائل سے بہتر وغیرہ جاننے ہوں گی وہ پورے کی ہوں گی۔ مسائل کی غیر جانبری کی وجہ سے ہمیشہ مسائل میں کیونکہ مسائل کو حل کرنا ہوا۔ تنخواہ انہیں ملے جس میں ماہ جون آگے ستمبر اکتوبر نومبر اور جنوری شامل ہیں۔ اس سے پہلے بھی مسائل دو چارج شیٹ میں اپنا جواب جمع کروا چکا ہے۔ تمام دستاویزات ہونے کے باوجود بھی مسائل کے خلاف یکطرفہ کارروائی کی گئی اور ایک چارج شیٹ میں مسائل کو دوبارہ سزا (ایک سالہ اینٹریٹ اور ۴۵ دن سائے Pay cut کیا گیا ہے جس کے خلاف مسائل نے جناب ڈپٹی کمشنر کو صاحب کو بابت تنزیہ سزا سائے ایمل بھی کی جو جس پر کوئی خاطر خواہ جواب نہ مل سکا۔ دوران تنخواہ بندش مسائل ایس۔ ایس۔ یو بیڈ کو آرڈر میں ڈیڑھ گھنٹہ کا ہوا ہے۔ ATs کو وہیں سے واپسی کی ضرورت میں مسائل کو ایس کوستان ٹرانسفر کر دیا گیا مسائل وہاں بھی CR-۵۹ پوائنٹ پر ڈیڑھ گھنٹہ کر دیا ہے۔ تقریباً ۱۵ دن تک مسائل اپنے جیب سے اور قہر من سا کر ڈیڑھ گھنٹہ کر دیا ہے۔ جب وہاں پر (ایس کوستان) میں جیب فریج ختم ہو گیا تو مسائل نے جناب ایس۔ پی۔ صاحب کو پیشگی اور ساری امور عالی سے آواہ کیا جس پر جناب ایس۔ پی۔ صاحب نے اکاؤنٹ بلیغ سے مبلغ (5000) روپے بطور قہر من

JAVED
 CHIEF CLERK
 Supreme Court of Pakistan
 SC # 5317



جناب عالی!

بجائے مشمولہ کاغذات انکوائری برخلاف کنشیل یوسف 253 SSU کی ایک شناختی یادداشت معروض خدمت ہوں۔ مذکورہ کنشیل کے خلاف مد 04 روزنامہ 25-10-2022 سے بدستور غیر حاضر ہونے پر SP ایڈیشن صاحب SSU کی ایک پشاور نے مذکورہ کنشیل کو مورخہ 05-12-2022 کو چارج شیٹ جاری کر کے کن DSP ایڈیشن کو اطلاع دی اور مقرر کیا۔ مذکورہ کنشیل کو بذریعہ سرکاری ٹیلی فون کال موبائل نمبر 0310-1414997 پر بار طلب کیا گیا لیکن صاحب اپنا چارج شیٹ وصول کرنے اور اپنا بیان ریکارڈ کرنے نہیں آیا۔

کیٹی انکوائری اور میسر شدہ ریکارڈ سے معلوم ہوا کہ مذکورہ کنشیل مد 04 روزنامہ 25-10-2022 کو پشاور کوہستان سے بدستور غیر حاضر ہے۔ بحیثیت انکوائری افسر اس نتیجے پر پہنچ چکا ہوں کہ کنشیل مذکورہ عادی غیر حاضر رہا ہے اور بار بار بار اطلاع کے باوجود اپنا چارج شیٹ وصول کرنے کے لئے نہیں آیا مزید مذکورہ کنشیل کا پرانا ریکارڈ بھی کر معلوم ہوا کہ پہلے بھی مختلف OBS میں بلا تخواہ اور جرمانہ ہو چکا ہے۔ کنشیل مذکورہ کے خلاف ایک طرف کارروائی کرنے کی سفارش کی جاتی ہے۔ مزید حکم افسرین بالا صاحبان کے افضل ہے۔ انکوائری رپورٹ عرض ہے۔

ڈی ایس پی ایڈیشن

ایس ایس ڈی (یک ایڈ کارٹر پشاور)

JAVED IZAZAT GULBELA
Advocate
Supreme Court of Pakistan
(ASC # 5317)

Supreme Court of Pakistan
Islamabad
Punjab
Sindh
Balochistan
FATA
Khyber Pakhtunkhwa
Gilgit-Baltistan