


FORM OF ORDER SHEET

Court of _____

Appeal No. 1583/2024

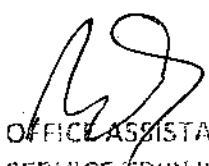
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/09/2024	<p>The appeal of Mr. Muneer Ahmad resubmitted today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 30.09.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Munir Ahmad received today i.e on 05.09.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Affidavit is not attested by the Oath Commissioner.
- 3- Memorandum of appeal is not signed by the appellant.
- 4- Copy of departmental appeal is not attached with the appeal.
- 5- Copy of order dated 30.07.2024 mentioned in the memo of appeal is not attached with the appeal
- 6- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal be placed on it.
- 7- The documents that are to be provided must be readable/legible.
- 8- Four copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal

No. 739 /Inst./2024/KPST,

Dt. 12/9 /2024.


OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Taimur Ali Khan Adv.
High Court Peshawar.

Respected Sir,

1- Removed

2- Removed

3- Removed

4- ~~Removed~~ the appellant filed application to provide

the departmental appeal as he has not kept the

copy of that. however it was not provided.


5- Copy of order 30/7/2024 is attached at page 47

6- Removed

7- Removed

8- Removed

Resubmitted after compliance


24/09/2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 1583 /2024

Munir Ahmad

VS


Police Department

INDEX

S.No	Documents	Annexure	Page No.
01	Memo of Appeal	----	01-06
02	Affidavit	----	07
03	Copy of FIR	A	08-09
04	Copies of memo letter dated 31.01.20217 and report dated 22.02.2017	B&C	10-11
05	Copies of medical report, memo dated 25.11.2022, order dated 06.12.2022, memo 08.02.2023, reference dated 05.12.2023, memo dated 20.12.2023	D&E	12-21
06	Copies of inquiry report dated 20.03.2023 and order dated 29.03.2023, inquiry report dated 29.05.2023 and order dated 31.10.2023	F&G	22-26
07	Copies of DD No.32 and DD No.40, FIR, order/judgment dated 21.12.2023, Charge sheet along with statement of allegations and reply to charge sheets, inquiry report and show cause notice and reply to show cause notice	G,H,I,J,K, L&M	27-39
08	Copies of charge sheet along with statement of allegations, reply to charge sheet and inquiry report	N&O	40-44
09	Copies of order dated 13.02.2024 and memo dated 02.03.2024	P&Q	45-46
10	Copies of order dated 23.04.2024	R	47-48
11	Copies of departmental appeal/revision, rejection order dated 30.07.2024 and memo dated 29.04.2024	S,T&U	49-51
12	Vakalat Nama	----	52

APPELLANT

THROUGH:


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT
Cell No.03339390916

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 1583 /2024

Munir Ahmad Constable No.1281,
Police Lines, Swabi.

(APPELLANT)

VERSUS

1. The provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. The Regional Police Officer, Mardan Region Mardan.
3. The District Police Officer, Swabi.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 23.04.2024, WHEREBY THE APPELLANT WAS REINSTATED INTO SERVICE AND CONVERTED HIS DISMISSAL FROM SERVICE INTO MINOR PUNISHMENT OF STOPPAGE OF THREE ANNUAL INCREMENTS WITHOUT CUMULATIVE EFFECT FOR THREE YEARS AND HIS INTERVENING PERIOD AS WELL AS ABSENCE PERIOD WAS TREATED AS LEAVE WITHOUT PAY AND AGAINST THE ORDER DATED 30.07.2024 RECEIVED BY THE APPELLANT ON 07.08.2024, WHEREBY THE DEPARTMENTAL APPEAL/REVISION PETITION OF THE APPELLANT WAS REJECTED FOR NO GOOD GROUNDS.

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 30.07.2024 MAY PLEASE BE SET ASIDE AND THE ORDER DATED 23.04.2024 MAY PLEASE BE MODIFIED TO THE EXTENT THAT THE STOPPED THREE ANNUAL INCREMENTS OF THE APPELLANT MAY BE RESTORED AND HIS INTERVENING PERIOD AS WELL AS ABSENCE PERIOD W.E.F 13.12.2023 TILL 22.04.2024 MAY BE TREATED ON FULL PAY WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS HONORABLE TRIBUNAL

②

DEEMS FIT AND APPROPRIATE MAY ALSO BE
AWARDED IN THE FAVOUR OF THE APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was appointed in the respondent department as Constable in the year 06.07.2012 and since his appointment, the appellant is performing his duty with devotion and honesty, whatsoever, assigned to him and no complaint has been filed by his superiors regarding his performance.
2. That on 06.11.2021, encounter was occurred between the police officials and terrorist in which some police officials were died while the appellant was seriously injured and in this respect FIR dated 06.11.2021 U/S 302,324,353,436,427,15AA ¾ Exp 7ATA PS CTD Mardan was lodged. (Copy of FIR is attached as Annexure-A)
3. That the appellant was seriously injured in above mentioned FIR, therefore, respondent No.3 through memo dated 31.01.2017 requested to MS District Headquarter Hospital Swabi for arrangement of standing medical Board for injury compensation of the appellant on which Medical Board was held on 22.02.2017 in which the Board concluded the nature of injury of the appellant is Grievous. (Copies of memo letter dated 31.01.2017 and report dated 22.02.2017 are attached as Annexure-B&C)
4. That as the appellant was seriously injured in the above mentioned FIR, therefore, he is under treatment and till date he is doing his treatment and due to bed medical condition he cannot perform his duty effectively, therefore, he filed many applications to retire him on medical ground on which correspondence were made between his high ups for arrangement Medical Board for the appellant which is evident from memo dated 25.11.2022, order dated 06.12.2022, memo 08.02.2023, reference dated 05.12.2023, memo dated 20.12.2023. (Copies of medical report, memo dated 25.11.2022, order dated 06.12.2022, memo 08.02.2023, reference dated 05.12.2023, memo dated 20.12.2023 are attached as Annexure-D&E)
5. That as the appellant cannot perform his duty efficiently due to above mentioned injurious, therefore, disciplinary proceeding was initiated against the appellant on the basis of absence 21.10.2022 to 07.02.2023, however, inquiry officer gave his recommendation on that absence that medical ground of the appellant qualifies him for lenient view and he may be exonerated on medical grounds on which minor punishment of censure was awarded to the appellant and his three

3

months period was treated as leave without pay vide order dated 29.03.2023. similarly, the appellant was again departmentally proceeded on the absence 10.03.2023 to 18.04.2023, however, the inquiry officer recommended that due to his material record that his absence period i.e 38 days may be count as medical leave and he may be exonerated from the charges leveled against the appellant, however, on that absence minor punishment of forfeiture of one year approved service was awarded to the appellant and his absence period was treated as leave without pay vide order dated 13.10.2023. (Copies of inquiry report and order dated 29.03.2023, inquiry report and order dated 31.10.2023 are attached as Annexure-F&G)

6. That as the appellant had health condition due to the above mentioned accident therefore, he has assigned to perform his duty at Kalu Khan Hospital near to his home, but he was transferred PS Utla and on transfer to Utla he went to PS Utla for performing his duty but he could not perform his duty at Utla due to extreme cold weather there and on 20.12.2023 exchange of some harsh took place between the appellant and his relative namely Said Arab Khan on land dispute on which both the party went to concerned police Station for complaint/report, however, due to intervention of the elders of the locality in police station they settle their issue and did not proceed the issue further and did not want file report against with each other, but the concerned DSP compel Said Arab Khan to file report against the appellant on which he filed report against the appellant through DD No. 32 and also compel the appellant to file report against Said Arab Khan on which he also filed report against the appellant through DD No.40 and on the basis of report of Said Arab Khan, FIR No. 1049 dated 20.12.2023 U/S 506/15-AA/13-KPK PS Kalu Khan was lodge against the appellant and as the issue has pitched up between the appellant and Said Arab Khan by the local elders, therefore, the competent court of law discharge the appellant on next day through an order/judgment dated 21.12.2023, but despite that charge sheet along with the statement of allegation were issued to the appellant on that FIR which was replied by the appellant in which mentioned that the issue has been settled by way of comprise between the parties and the competent court also discharge him but despite that inquiry was conducted against the appellant and show cause notice was issued to him, which was replied by him in which narrated the whole story about the FIR. (Copies of DD No.32 and DD No.40, FIR, order/judgment dated 21.12.2023, Charge sheet along with statement of allegations and reply to charge sheets, inquiry report and show cause notice and reply to show cause notice are attached as Annexure-H,I,J,K,L&M)
7. That although the appellant went to perform his duty at PS Utla but due to extreme cold weather and his bad health condition he cannot perform his duty at PS Utla on which charge sheet along with statement of allegation dated 26.12.2023 were issued to the appellant,

4

which was replied by the appellant in which he gave the reason of not performing his duty at PS Utlā and on the basis of that absence inquiry was conducted against the appellant and inquiry officer gave recommendation of major punishment despite the fact that the inquiry officer has knowledge about the health condition of the appellant and it was not possible for the appellant to perform his duty at far flung cold area of Utlā. (Copies of charge sheet along with statement of allegations, reply to charge sheet and inquiry report are attached as Annexure-N&O)

8. That on the basis of FIR No.1049 dated 20.12.2023 u/s 506//15-AA/13-KPK PS Kalu Khan on which charge sheet dated 22.12.2023 was issued, the appellant was dismissed from service on 13.02.2024. It is pertinent to mention here that as the appellant was dismissed from service on 13.02.2024 due to which his application for retirement on medical grounds was also filed on 02.03.2024. (Copies of order dated 13.02.2024 and memo dated 02.03.2024 are attached as Annexure-P&Q)

9. That the appellant then filed departmental appeal, however, the appellant did not keep the copy of departmental appeal which may be requisite from the department. Respondent No.2 on his departmental appeal passed an order dated 23.04.2024, whereby major punishment of dismissal from service was modified and convert the same into minor punishment of stoppage of three annual increments without cumulative effect for a period of 03 years he was reinstated into service and his intervening period as well as his absence period was treated as leave without pay. (Copies of order dated 23.04.2024 is attached as Annexure-R)

10. That the appellant then filed departmental appeal/revision on 15.05.2024, which was rejected on 30.07.2024 and the rejection order dated 30.07.2024 was communicated to the appellant on 07.08.2024. It is pertinent to mention here that the name of the appellant again included for Medical Board referred to Central Police Office Peshawar which is evident from the memo dated 29.04.2024. (Copies of departmental appeal/revision, rejection order dated 30.07.2024 and memo dated 29.04.2024 are attached as Annexure-S,T&U)

11. That the appellant now wants to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

GROUND:

A) That the order dated 23.04.2024 and rejection order dated 30.07.2024 are against the law, rules, facts, norms of justice and material on record, therefore, order dated 30.07.2024 is liable to be set aside and

5

the order dated 23.04.2024 is liable to modified to the extent by setting aside imposition of minor punishment of stoppage of three annual increment without cumulative effect for a period of 03 years upon the appellant and his intervening period as well as his absence period which was treated as leave without pay.

- B) That on dated 20.12.2023 exchange of some harsh took place between the appellant and his relative namely Said Arab Khan on land dispute on which both the party went to concerned police Station for compliant/report, however, due to intervention of the elders of the locality in police station they settle their issue and did not proceeded the issue further and did not want file report against with each other, but the concerned DSP compel Said Arab Khan to file report against the appellant on which he filed report against the appellant and also compel the appellant to file report against Said Arab Khan and on the basis of report of Said Arab Khan FIR No. 1049 dated 20.12.2023 U/S 506/15-AA/13-KPK PS Kalu Khan was lodge against the appellant and as the issue has pitched up between the appellant and Said Arab Khan by the local elders, therefore, the competent court of law discharge the appellant on next day i.e 21.12.2023, but despite that disciplinary proceeding was initiated against the appellant on which the appellant was dismissed from service, which is against the norms of justice and fair play.
- C) That the appellant and his opponent Said Arab Khan did not want file complaint against each other but they were compel by the concerned DSP to file complaint against each other due to which FIR No. 1049 dated 20.12.2023 U/S 506/15-AA/13-KPK PS Kalu Khan was lodged against the appellant, however, he was discharged on the next day on 21.12.2023 by the competent court of law, which means that the appellant has been punished on baseless FIR by the fault of the others.
- D) That appellant was seriously injured in encounter occurred between the police officials and terrorist and in this respect FIR dated 06.11.20216 U/S 302,324,353,436,427,15AA ¾ Exp 7ATA PS CTD Mardan was also lodged and due to his bad health condition he cannot perform his duty efficiently, therefore, he filed many applications for retirement of Medical Board, however, his case on retirement on Medical Board could not be finalized due to his dismissal from service on 13.02.2024 on baseless FIR which effect his case of retirement of medical ground for no fault on his part.
- E) That the appellant was appointed on 06.07.2012 was seriously injured in the above mentioned FIR and due to bad health condition he cannot

6


perform his duty effectively and wants to retire on medical ground, however, his absence period w.e.f 21.10.2022 to 07.02.2023 by treating leave without pay in order dated 29.03.2023, punishment of forfeiture of one year approved service and absence period and intervening period w,e,f 13.12.2023 till 22.04.2024 by treating leave without pay and stoppage of three annual increments without cumulative effect for a period of 03 years in order dated 23.04.2024 will effect his pension if he retire on medical ground, therefore, lenient view is requested to modify the order dated 23.04.2024 to the extent that the stopped three annual increment without cumulative effect for a period of 03 years of the appellant may be restored and absence period and intervening period w,e,f 13.12.2023 till 22.04.2024 may be treated on full pay as if the order 23.04.2023 is not modified to the extent stoppage of three annual increment without cumulative effect for a period of 03 years and absence period and intervening period w,e,f 13.12.2023 till 22.04.2023 was treated as leave without pay, then ultimately it will effect the pension of the appellant and being low paid employee he will be badly effected.

- F) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed the acceptance of this appeal, the order dated 30.07.2024 may please be set aside and the order dated 23.04.2024 may please be modified to the extent that the stopped three annual increments of the appellant may be restored and his intervening period as well as absence period w.e.f 13.12.2023 till 22.04.2024 may be treated on full pay with all back and consequential benefits. Any other remedy which this honorable tribunal deems fit and appropriate may also be awarded in the favour of the appellant.


APPELLANT
Munir Ahmad

THROUGH:


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT
&
SHAKIR ULLAH TORANI)
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. _____/2024

Munir Ahmad

VS

Police Department

AFFIDAVIT

I, Munir Ahmad Constable No.1281, Police Lines, Swabi, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.


DEPONENT

1. The first part of the document discusses the importance of maintaining accurate records for all transactions. It emphasizes that every entry should be clearly documented and verified.

2. The second part details the specific procedures for recording income and expenses. It includes instructions on how to categorize different types of transactions and how to reconcile the accounts regularly.

3. The third part covers the requirements for auditing and reviewing the financial statements. It outlines the steps for ensuring the integrity of the data and the accuracy of the reports.

4. The final part provides a summary of the key points and offers advice on how to handle any discrepancies or errors that may arise during the process.

Account Name	Initial Balance
Income	1000.00
Expenses	(200.00)
Net Income	800.00
Opening Balance	500.00
Closing Balance	1300.00

Prepared by: [Signature]

Date: 03/19/05

Total: 1300.00



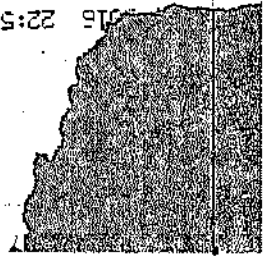
Handwritten text at the top of the page, possibly a header or title, written in Arabic script.

Handwritten text in the middle right section, including a date: 06.11.2016.

Main body of handwritten text in Arabic script, appearing to be a letter or report.

TO 9538222434 FROM PARSONS 22:56

Handwritten number 6 inside a circle.



From: The District Police Officer, Swabi.

To: The Medical Superintendent,
District Headquarters Hospital, Swabi.

No. / PC, dated Swabi, the 31-1-2017.

Subject: STANDING MEDICAL BOARD.

Memo:

Constable Munir Ahmad No. 1281 has received injuries during official duty occurred in the Jurisdiction of Police Station Topi vide case FIR No. 66 dated 06.11.2016 u/s 302/324/353/636/427/ % Exp: /15AA/7ATA PS CTD Mardan. The above named Constable was immediately referred to District Headquarter Hospital, Swabi where from he was further referred to LRI Peshawar for necessary treatment.

According to Govt. instructions injury compensation cases are required to be sent to the competent authority after the standing Medical Board's opinion.

It is requested that standing Medical Board may please be arranged to examine the above named Constable. The date and time fixed for the purpose may also be intimated to this office.

District Police Officer,
Swabi.

No. 698 /PC,

Copy of above is submitted to the Deputy Inspector General of Police Mardan Region-I, Mardan for favour of information, please.

District Police Officer,
Swabi.

29
40

THE MEDICAL SUPERINTENDENT DHQ TEACHING
HOSPITAL SWABI

Telephone & Fax #: 0938-221267



Medical Examination.

Name: Mr Munir Ahmad No.1281 S/O Sherin Said

Referred by: DPD Swabi

Mark of Identification: Nil

N.I.C No 16202-0785568-3

Time: 11:00 AM Dated: - 22/02/2017

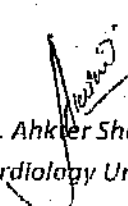
Opinion of Medical Board:


1. Dr. Naveed Iqbal Radiologist
2. Dr. Muhammad Shafiq Aslam District Surgeon
3. Dr. Akhter Sher MO Cardiology Unit.

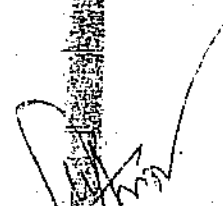
CONCLUSION:

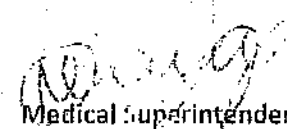
Patient examined completely. He is a case of fire arm injury right thigh through and through. Multiple metallic foreign bodies inside thigh.

Nature of injury is **Grievous**


Dr. Akhter Sher MO
Cardiology Unit


Dr. Naveed Iqbal Radiologist.


Dr. Muhammad Shafiq Aslam
District Surgeon


Medical Superintendent
DHQ Teaching Hospital
Swabi

Dr. Akhter Sher

Dr. Muhammad Shafiq Aslam



PAKISTAN INSTITUTE OF MEDICAL SCIENCES ISLAMABAD
Islamabad Hospital

Rs. 00

PCN : P-11/20-39348
OPD Name : Emergency Triage
Patient Name : MUNIR AHMED
Age : 27 year(s) 0 month(s) 3 day(s) old.
Payment Type : (EAC) Triage
City : ISLAMABAD
Address :
OPD # : 020/20/11/27194
Date : 30/11/2020 11:38:35AM
F/N : SHIREEN SAID
Sex : Male
CNIC :
Phone : 03139654761

D 12

97

472 یہ P-11/20-39348 آپ کی کاپی کنٹرول نمبر ہے۔ یہ سنجال کر رکھیں اور ہمیشہ یہ ہسپتال آنے پر اپنے ساتھ لائیں۔
نوٹ۔ ڈاکٹر سے مشورے کے بعد ہسپتال میں موجود ادویات حاصل کرنے کیلئے فارمی سے رابطہ کریں۔
اپنا شناختی کارڈ اپنے ہمراہ لے کر آئیں

Entry Operator: eac filter Amend by: eac filter Re-Amend by:

Priority Time:

P1 P2 P3 P4 P5

Complaint / Diagnosis : Treatment

Post op case of fire arms
ry

Alc Juice pain

By wren 1/11/2020
Reju to mlu SW II

BP: /
PULSE:
O2SAT:
TEMPRATURE
RESPIRATION:
COVID-19: /

ER
Room 14

DR. FARKHANA (MBBS FCPS)
MEDICAL OFFICER
Pakistan Institute of Medical Sciences
(PIMS), Islamabad

30/11/20



PAKISTAN INSTITUTE OF MEDICAL SCIENCES ISLAMABAD

Islamabad Hospital

Rs. 5

PCN : P-11/20-39348
OPD Name : Neurology(IH)
Patient Name : MUNIR AHMED
Age : 28 year(s) 4 month(s) 1 day(s) old.
Weight :
Address :
Payment Type : General (OPD)
OPD # : 272/22/03/03849
Date : 28/03/2022 11:08:12AM
F/N : SHIREEN SAID
Visit Unit :
Sex : Male
City : ISLAMABAD
CNIC :
Phone : 03139654761

یہ P-11/20-39348 آپ کا پیشٹ کنٹرول نمبر ہے۔ یہ سنبھال کر ریکس اور میڈیچر ہسپتال آنے پر اپنے ساتھ لائیں۔

168

نوٹ۔ ڈاکٹر سے مشورے کے بعد ہسپتال میں موجود ادویات حاصل کرنے کیلئے فارمیسی سے رابطہ کریں۔

Entry Operator: cac filer

Amend by: cac filer

Re-Amend by: Muhammad Nazir

Complaint / Diagnosis :

Treatment

Came for

H/O FAI - 4 years back.

Operated twice.

C/O: Numbness of feet.

Unable to walk properly.
shoes slip from feet.

Advice- NCS/EMG.

Physiotherapy &
foot orthosis (NIRM).

Rx:

Tab. Neuromet 500 mg (1+0+1)
اندھ، اندھ، اندھ

DR. MARYAM KHALIL
PGR Neurology
PIMS ISLAMABAD.



PAKISTAN INSTITUTE OF MEDICAL SCIENCES ISLAMABAD

14

Islamabad Hospital

Rs. 5

PCN : P-05/23-05376
 OPD Name : Neuro Surgery(IH)
 Patient Name : MUNIR AHMED
 Age : 30 year(s) 2 month(s) 29 day(s) old.
 Weight :
 Address :
 Payment Type : General (OPD)

OPD # : 283/23/05/00354
 Date : 03/05/2023 10:28:41AM
 F/N : SHAREEN SAID
 Visit Unit :
 Sex : Male
 City : ISLAMABAD
 CNIC : 16202-0785568-3
 Phone :

شفیقہ منورہ سرگرمی
 مشورہ کا دن منگل 15/05/2023
 ڈاکٹر شہزادہ شہزادہ

یہ کلینک کنٹرول نمبر ہے۔ یہ سنبھال کر رکھیں اور ایڈمٹ ہو ہسپتال آنے پر اپنے ساتھ لائیں۔

125

نوٹ۔ ڈاکٹر سے مشورے کے بعد ہسپتال میں موجود ادویات حاصل کرنے کیلئے فارمیسی سے رابطہ کریں۔

Entry Operator: M. Zafar

Amend by:

Re-Amend by:

Complaint / Diagnosis :

Treatment

Handwritten notes in Urdu:
 سانس کی کمی
 اور
 دھڑکنے کا احساس

Handwritten text: FATI

Handwritten text: ST. Leg pain

Handwritten text: nil intact

Handwritten text: SLR - RT 65°
 LT 75°

Handwritten notes in Urdu:
 اس کے ساتھ
 ساتھ اس طرح

Handwritten prescriptions:
 Tab. Tazdel
 Tab. Clapsel 100g
 (0-2) +
 Tab. mgolax 4g
 (0-15) +
 Tab. metax
 (0-2) +



OUTPATIENT DEPARTMENT (OPD)
MTI THQ HOSPITAL TOPI SWABI

15

13/12/23

Muhammad Ahmad

443/13

Presenting Complaints

R

Remarks

Investigations

Diagnosis

Plan

Handwritten notes in Urdu and English:

سینے کی تھکن (Chest pain)
 (13/12/23)
 → (13/12/23) :
 سینے کی تھکن (Chest pain)
 (13/12/23)
 Tab. Panadol
 (13/12/23)
 (13/12/23)
 (13/12/23)

Stamp & Signature of Prescriber

16



OUTPATIENT DEPARTMENT (OPD)
MTI THQ HOSPITAL TOPI SWABI

1377

نمبر 1377

94/12/2022

Rx

Presenting Complaints

- Recurrent N/V
of F.A.I.
- X-ray Pelvis
- Slipped F.13. (D)

Investigations

Infection. Probe
+ success.
Success.

Diagnosis

NCS/EMG
also advised before

Plan

Remarks

X-ray
Pelvis
for film
V-type
(AP)

- Pain
Ignored
2 days

- Erector
D. muscle
fascia

- T.12
T.11
T.10
T.9
T.8
T.7
T.6
T.5
T.4
T.3
T.2
T.1

Stamp & Signature of Prescriber

(Signature)



OFFICE OF THE
 DISTRICT POLICE OFFICER, SWABI
 PHONE# 0938-920053 FAX# 0938-920054
 EMAIL: dpo_swabi@yahoo.com

E (17)

No. 3127 /EC, dated Swabi the 25-11 /2022

To: The Regional Police Officer,
 Mardan.

Subject: CONSTITUTION OF MEDICAL BOARD.

Memo: kindly refer to your office letter Endst: No. 4875-84/ES dated 20.07.2022 on the subject noted above.

It is submitted that the following Police personnel of this District have submitted applications stating therein that they are unable to continue their Services (operational duties) due to reasons mentioned against their names and intends to proceed on medical board.

S No.	Name & Belt No.	Reason
1	Saddam Hussain No. 832	Epilepsy
2	Sherin Rahman No. 592	Cardiovascular & Blood Pressure
3	Munir Ahmad No. 1281	Injured during performing his official duty

Apropos, it is requested to consider above mentioned police officials for examination of their cases before region level committee constituted vide above cited letter, please.

Enclosed - Medical documents

Nia
 DISTRICT POLICE OFFICER,
 SWABI

24.11.2022

18

ORDER

A Committee comprising of the following Officers under the Chairmanship of the Undersigned is hereby constituted to scrutinize the cases of Police Officers who requested for retirement on medical grounds.

- 1. Regional Police Officer, Mardan (Chairman)
- 2. District Police Officer, Swab (Member)
- 3. Representative of DHQ Hospital, Swabi (Member)

Regional Police Officer,
Mardan.

6/12/22

No. 976-96/ES,

Dated Mardan the 06/12/2022.

Copy forwarded for information and necessary action to the:-

- 1. Assistant Inspector General of Police, Establishment Khyber Pakhtunkhwa, Peshawar w/r to his office letter No. 6306-30/E-IV dated 19.07.2022.
- 2. District Police Officer, Swabi w/r to his office Memo: No. 9187/EC dated 25.11.2022.
- 3. Medical Superintendent District Headquarters Hospital, Swabi.

12/12

PS attached.

EC

EC
for information

9761
12/12/22

10/12
DPO Swabi
08-12-2022



OFFICE OF THE
DISTRICT POLICE OFFICER, SWABI
PHONE#0938-920053 FAX# 0938-920054.
EMAIL: dpo_swabi@yahoo.com.

19

No. 722-83/EC, dated Swabi the 2-2 /2023

To: The Regional Police Officer,
Mardan.

Subject: MEDICAL BOARD.

Memo:

Kindly refer to your office Endst No. 9594-96/ES dated 06.12.2022 on the subject noted above.

It is submitted that a committee under your kind Chairmanship has already been constituted by your good self vide above cited letter to scrutinize the cases of Police Officials who requested for retirement on medical grounds.

It is therefore, requested to fix a suitable date & time to finalize the subject matter, please.


DISTRICT POLICE OFFICER,
SWABI

C.C:

The Medical Superintendent District Headquarter, hospital Swabi for information.

REFERENCE ATTACHED.

20

Respected Sir,

Constable Munir Ahmad No. 1281 presently posted at Casualty Hospital Kalu Khan, submitted the attached application stating therein that he is unable to continue his service as he injured during official duties in the jurisdiction of PS Topi vide case FIR No. 66 dated 06.11.2016 u/c 302/324/353/436/427 % EXP/15AA/7ATA PS CTD and requesting for pension on Medical ground.

From perusal of his service roll, he has completed 11 years, 04 months and 23 days net service and his age is 30 years, 10 months and 01 days w/r to 05.12.2023.

If approved, may send his application to the Region Chief, for favor of consideration or otherwise.

Submitted for favour of order, please.

Alhman

ESTABLISHMENT CLERK
Date: 05.12.2023

HC
DPO
5/12

call in ok.
[Signature]

approved
[Signature]



OFFICE OF THE
DISTRICT POLICE OFFICER, SWABI
PHONE# 0938-920053 FAX# 0938-920054.
EMAIL: dpo_swabi@yahoo.com.

21

No. 7387 /EC, dated Swabi the 20-12 /2023

To: The Regional Police Officer,
Mardan.

Subject: APPLICATION FOR RETIREMENT ON MEDICAL GROUNDS.
Memo:

In continuation to this office letter No. 5287/EC dated 19.09.2023.

Enclosed kindly find herewith an application submitted by Constable Munir Ahmad No. 1281 of this District Police stating therein that he is unable to continue his service (operational duties) due to his injury during performing his official duty in case FIR No. 66 dated 06.11.2016 u/s 302/324/353/436/427/ ¼ EXP/15AA/7ATA PS CTD Mardan and requesting for retirement on medical grounds.

Apropos, it is requested to consider above mentioned constable for examination of his case before regional level committee constituted, please.

(HAROON RASHID KHAN) PSP
DISTRICT POLICE OFFICER,
SWABI



**OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE,
HEADQUARTER, SWABI.**
Phone No. 0938-280279, E-Mail: dsphaswabi@gmail.com

To: The District Police Officer,
Swabi.

No: 150 /H.Qrs: Swabi dated, 20/03/2023.

Subject: - **DEPARTMENTAL ENQUIRY AGAINST CONSTABLE MUNAIR AHMAD No. 1281**
Memo:

Kindly refer to your office Endorsement No. 23/CC/PA dated 20.02.2023 on the subject cited above.

SUMMARY OF ALLEGATION:-

It is alleged that Constable Munair Ahmad No. 1281, while posted at Police Lines Swabi absented himself from duty w.e.f 21.10.2022 till date without any leave/prior permission of the competent authority. This commission falls under the purview of in-efficiency and miss-conduct and is punishable under rules 4 a and b of Police Rules 1975 amended 2014.

PROCEEDINGS

The undersigned perused the relevant enquiry file and summoned the delinquent officer for personal hearing and recording his statement.

STATEMENT OF CONSTABLE MUNAIR AHMAD No. 1281

He briefly stated that he got injured vide case FIR No. 66 dated 06.11.2016 w/s 302/324/427/7ATA, CTD Mardan. Earlier, he was reported to have been recovered fully, but he was not for when insp. Legal send him to DHQ Hospital for examination, the doctor advised him further tests. He further claimed that he has no Money for Treatment. He may be provided with Medical Aid. He further revealed that he has applied for Medical Board. He prayed for exoneration. (Statement and Medical Documents attached)


FINDINGS:-

After the perusal of enquiry papers, relevant record at hand, and careful deliberations the undersigned reckons that:-

1. The constable has reported his arrival for duty on 07.02.2023. His absence period is about 03 months and 14 days. (DD report attached)
2. The ibid Medical Document suggests that he still require Medical Attention. However, the extent and nature of his Medical condition cannot be gauged for the non-availability of Medical diagnosing requiring funds. A thorough Medical diagnosing will determine the state of his health.
3. He may be deputed to duty after the state of his health is determined.

RECOMMENDATIONS:-

Forgoing in view, the undersigned is of the considerate opinion that Constable Munair Ahmad No.1281 is guilty as charged. However his medical condition qualifies him for lenient view. He may be exonerated on medical grounds, if agreed, please.


(NOOR-UL-AMIN KHAN)
Deputy Superintendent of Police,
H.Qrs, Swabi.

OFFICE OF THE
DISTRICT POLICE OFFICER, SWABI
PHONE# 0938-920050 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

23

No. 1342-45 IPA, :

Dated 29/03/2023

ORDER

Certified to be True Copy.

This order is aimed to dispose-off the departmental proceedings conducted against **Constable Munair Ahmad No.1281** of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014) vide this office No.23/CC/PA, dated 20.02.2023 on the following allegations.

He while posted at Police Lines Swabi, absented himself from duty w.e.f. 21.10.2022 to 07.02.2023 without any leave/prior permission of the competent authority.

He was issued charge sheet on the said allegations and enquiry proceedings were entrusted to **Mr. Noor ul Amin DSP H.Qrs Swabi** under Police Rules-1975, ammended-2014. The Enquiry Officer conducted departmental enquiry, collected evidence, recorded statements of all concerned and submitted his findings. The undersigned thoroughly perused the findings of the Enquiry Officer.

The defaulter Constable was called in orderly room dated 28.03.2023, but he could not advance any reason in self-defence.

Keeping in view findings report of the Enquiry Officer and conduct of the defaulter Constable, the undersigned came to the conclusion that the charges levelled against him have been proved beyond the shadow of doubt.

Therefore, in exercise of powers vested upon undersigned, I, **Najmul Hasnain Liaquat, PSP**, District Police Officer Swabi hereby award Constable Munair Ahmad No.1281 minor punishment of "Censure" and treat his period of three months absence as "leave without pay" with immediate effect. His pay is hereby released.

Order Announced

OB No. 260

Dated: 28/03/2023

[Handwritten Signature]

NAJMUL HASNAIN LIAQUAT, (PSP)
DISTRICT POLICE OFFICER
SWABI

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI.

Copies to the: -

1. Pay Officer.
2. Establishment Clerk.
3. I/C PAL
4. Fauji Missal Clerk.

Date of Presentation of Application: 29-3-23

Copying Fee: Nil

Total Pages: 01

Name of Copyist: Faral Subhan

Date of Completion: 03-04-23

Date of Delivery of Copy: 04-04-23

ATTESTED

[Handwritten Signature]

District Police Officer, Swabi.

No. 217 /L

Dated 29/5/2023

DEPARTMENTAL ENQUIRY OF SI CONSTABLE MUNAIR AHMAD NO.1281
POLICE LINES SWABI.

Certified to be True Copy.

Reference attached:-

Allegations:-

It is alleged that:-

1. While posted at Police Lines Swabi, he absented himself from duty w.e.f 10.03.2023 till date without any leave/prior permission of the competent authority.

In order to probe into the matter the undersigned perused the entire record alongwith the statement of concerned which are as under:-

STATEMENT OF CONSTABLE MUNAIR AHMAD NO.1281.

He stated that on 06.11.2016 he was posted in Police Station Zaida. On the same he was critically injured in encounter with terrorist in village Mani. In this connection a proper case vide FIR No.66 dated 06.11.2016 u/s 302/324/353/7ATA/3/4 EXP/436/427/15-AA was registered in Police Station CTD District Mardan. Due to serious injuries he is no longer fit for duty and still he is under treatment (Medical documents attached). He further stated that he was not absent deliberately from duty. His detail statement is attached herewith for perusal.

FINDINGS:-

1. From the entire record it transpired that the delinquent official was critically injured in encounter with terrorist in village Mani. In this connection a proper case vide FIR No.66 dated 06.11.2016 u/s 302/324/353/7ATA/3/4 EXP/436/427/15-AA was registered in Police Station CTD District Mardan.
2. His name was also recommended for regional level committee that he is unable to continue his duty due to his injuries vide letter No.3187/EC dated 25.11.2022.

ATTESTED



PIO
District Police Officer, Swabi

Certified to be True Copy.


3. The undersigned personally examined his style of walking and observed that he is not medically fit to continue his duty more.
4. The delinquent official absent from duty w.e.f 10.03.2023 to 18.04.2023 due to his injuries and for treatment and he is still under treatment.
5. His total absent period is 38 days.

25

RECOMMENDATION:-

Keeping in view, the above facts, his medical record, it is recommended that his absence period i.e 38 days may be count as medical leave and he may be exonerated from the charges leveled against him, if, agreed.

Date of Presentation of Application: 13/05/2024
Copying Fee: nil
Total Pages: (02)
Name of Officer: Javed Iqbal
Date of Completion: 13/05/2024
Date of Delivery of Copy: 13/05/2024


Sub-Divisional Police Officer,
Lahor

ATTESTED
PIO 
District Police Officer, Swabi.



(1221)

OFFICE OF THE
DISTRICT POLICE OFFICER, SWABI
PHONE# 0938-920050 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

26

No. 5430-931/A

ORDER

Dated. 13/10/2023

Certified to be True Copy.

This order is aimed to dispose-off the departmental proceedings conducted against Constable Munair Ahmad No.1281 of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014). vide this office No.65/CC/PA dated 09.05.2023 on the following allegations.

While posted at Police Lines Swabi, he absented himself from duty w.e.f. 10.03.2023 to 18.04.2023 without any leave/prior permission of the competent authority. Therefore, he was served with Show Cause Notice. His reply to the Show Cause Notice was received and perused but was not found satisfactory.

He was issued charge sheet on the said allegations and enquiry proceedings were entrusted to SDPO Lahor under Khyber Pakhtunkhwa Police Rules-1975 ammended-2014. The Enquiry Officer conducted departmental enquiry, collected evidence, recorded statements of all concerned and submitted his finding report. The undersigned thoroughly perused the findings of the Enquiry Officer.

The defaulter Official was called in orderly room dated 10.10.2023, but he could not advance any reason in self-defence.

Keeping in view findings report of the Enquiry Officer and conduct of the defaulter Official, the undersigned came to the conclusion that the charges levelled against him have been proved beyond the shadow of doubt.

Therefore, in exercise of powers vested upon undersigned, I, Haroon Rashid Khan, T.ST/PSP, District Police Officer Swabi hereby award Constable Munair Ahmad No.1281 minor punishment of "forfeiture of one year approved service" with immediate effect. His period of absence is treated as leave without pay. His pay is hereby released.

Order Announced
No. 1187
Dated: 13/10/2023

HAROON RASHID KHAN (T.ST/PSP)
DISTRICT POLICE OFFICER
SWABI

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI.

Copies to the: -

1. Pay officer.
2. Establishment Clerk.
3. I/C PAL
4. Fauji Missal Clerk

ATTESTED

District Police Officer, Swabi.

[Faint, illegible handwritten text, possibly bleed-through from the reverse side of the page. The text is arranged in several horizontal lines across the page.]

H
②⑦

Handwritten text in a cursive script, possibly Arabic or Persian, covering the majority of the page. The text is arranged in approximately 15 horizontal lines, with some lines being more densely packed than others. The ink is dark and the background is light, though there is some graininess and noise in the scan.

86

Better copy (27)

روزنامہ 20/12/2023

نقلہ 32

32

ضلع صوابلی

تھانہ کالو خان

عقب خان DSP

پج رت

سرکل رزرو بوقت 17:00 بجے میں غلامہ پر مولیٰ سے تھانہ بڈا حاضر خاصہ آکر بوقت 12:12 بجے موبائل نمبر 03068342045 سے میری ذاتی موبائل نمبر 03335350548 پر کال آیا اور اپنے آپ کو کانسٹیبل سید عرب ظاہر کر کے بتلایا کہ میں محکمہ پولیس میں کانسٹیبل ہوں۔ آج میں کالو خان آ کر اپنے اراضیات کو دیکھنے کے لیے گیا تھا۔ کہ منیر نامی کانسٹیبل جو اس کا چچا زاد ہے شخص نے ہماری زمین کو نقصان پہنچایا ہے۔ میں نے جوابا کہا کہ تھانہ میں جا کر رپورٹ کرو اور میں نے بتلایا کہ میں صوابلی ایس پی صاحب کے دفتر پیشی کے لیے آیا ہوں آپ کا جو بھی رپورٹ ہے پولیس تحریر کرے گا۔ واپسی پر اپنے دفتر آکر دفتری سٹاپ نے بتلایا کہ سید عرب کانسٹیبل آیا تھا۔ اپنے ساتھ ایک پستول لایا تھا اور کہاں کہ منیر نامی کانسٹیبل جو اس کا چچا زاد ہے۔ نے اس کو مارنے کی کوشش کی ہے لیکن خود سے کار تو س چلاتا۔ مذکورہ بالا نمبر سے دوبارہ کال بوقت 16:26 بجے دوبارہ کل آیا اور اپنے آپ کو سید عرب کہہ کر بتلایا کہ رپورٹ کروانا چاہتا ہوں کہ میں نے جواب میں کہا کہ رپورٹ اپ کا حق ہے میں جائے بعد میں محرم فضل خالق نے وزیر وائس بھیجا اور کہاں کہ کانسٹیبل ان منیر احمد اور سید عرب ائے ہوئے تھے اور ایک دوسرے کے خلاف دھمکانے اور مارنے پینے اور گالی گلوچ کرنے کی رپورٹس کرتے ہیں اور پستول 30 بور بلا نمبر پکس چارج لوڈ شدہ سات عدد کار توں جس میں ایک روند مس ہے کانسٹیبل سید عرب نے پیش کیا۔ اور بتلایا کہ بوقت وقوعہ منیر نے مجھ پر ایم کر کے فائر کرنے کی کوشش کی تھی۔ مگر خوش قسمتی سے روند چل نہ سکا اور میں دوران ہاتھ پائی منیر سے پستول بذریعہ جین کر محرم کو پیش کیا ہے۔ اور دوسرا فریق منیر بھی ڈرانے دھمکانے اور گالی گلوچ کی رپورٹ کرتا ہے جس پر میں نے جواب میں کہا کہ دونوں کی رپورٹس لکھ کر پی اے درج رجسٹر کرے بعد میں محرم تھانہ نے سچ کہا کہ ابھی دونوں فریقین ایک دوسرے کے خلاف رپورٹس نہیں کرواتے میں نے جوابا کہا ہر دو کانسٹیبلان منیر اور سید عرب بند خوات تھانہ کریں اور ان کے خلاف پولیس کی مدد میں مقدمہ

جارجا

Al
20-12-2023

28

درج رجسٹر کریں یہ دو منیر اور سید عرب پولیس میں کانسٹیبلان ہیں۔ جملہ حقائق افسر بالا کے نوٹس میں لایا جا کر اپنے ہماریان بوقت بغرض مزید گشت روانہ ہوں۔

A
A. S. S. S.
23-9-24

Handwritten text in Arabic script, appearing to be a list or ledger with multiple columns and rows. The text is dense and difficult to read due to the high contrast and graininess of the scan. Some legible fragments include:

- 1955
- 1956
- 1957
- 1958
- 1959
- 1960
- 1961
- 1962
- 1963
- 1964
- 1965
- 1966
- 1967
- 1968
- 1969
- 1970
- 1971
- 1972
- 1973
- 1974
- 1975
- 1976
- 1977
- 1978
- 1979
- 1980
- 1981
- 1982
- 1983
- 1984
- 1985
- 1986
- 1987
- 1988
- 1989
- 1990
- 1991
- 1992
- 1993
- 1994
- 1995
- 1996
- 1997
- 1998
- 1999
- 2000

29

Bethu copy - (29)

تقلید 40 روز نامہ 20/12/2023

ضلع صوابلی

تھانہ کالو خان

وقت 17:15 بجے مورخ 20/12/2023 اس وقت مسی منیر احمد ولد شریں سید سکنہ محلہ پڑہ کالو خان
بھاضری تھانہ آکریوں رپورٹ کرتا ہے۔ آج میں کسی کام کے سلسلے میں کالو خان سٹاف موٹر سائیکل پر آیا ہوا
تھا۔ جب واپسی پر بمقام مکان نیٹار باچہ ولد قمریش ساکن کالو خان محلہ پر رڈ بوقت 11:45 پہنچا تو وہاں پر پہلے سے
موجود مسی سد عرب خان ولد افسر سید ساکن کالو خان محلہ تھانہ کورونہ سے میں نے پوچھا کہ آپ میرے گھر کے
طرف کیوں گئے ہوئے تھے۔ اس بات پر مذکورہ سید عرب خان میرے ساتھ امداد پر فساد پر فساد ہو کر میرے
ساتھ گالی گلوچ اور میرے ساتھ ہاتھ پائی شروع کر کے ساتھ ہی مجھے قتل کرنے کی دھمکیاں دے کر بڈھ شلوار
سے پستول نکال کر پستول سے مجھ پر گزرات کر کے جن کے گزرات سے میرا دائیں ہاتھ پر دروند مند ہوا ہوں
۔ وہاں موجود گان کسان موجود تھے۔ رپورٹ میں دیر اسی وجہ سے ہوئی کہ میرے مشران ہمارے مابین راضی
نامہ کی کوشش کر رہے تھے وجہ عناد راضی تنازعہ ہے۔ میں اپنے میں اپنے آپ کو گالی گلوچ کرنا اور دھمکیاں
دینے اور پستول سے گزرات کرنے کا برخلاف سید عرب خان ولد افسر سید ساکن کالو خان دعویٰ دار
القبضہ کارروائی پولیس حسب گفتہ مسائل رپورٹ درج بالا ہو کر پڑھ کر سنایا جا کے درست تسلیم کر
کے رپورٹ خود دستخط ثبت کر کے تصدیق کرتا ہوں۔ مذکورہ کا نقشہ ضرعین مطابق رحمت مرتب کر کے بغیر یہ
خانیہ معالجہ کارروائی کرنے سے پہلے چونکہ رپورٹ مقدمہ علب 1249/83 جرم 1588 - 156 محلہ تھانہ
کورونہ کا بلتامل ہے۔ اور رپورٹ کنندہ مقدمہ بالا میں ملزم ہے جس کو جب ضابطہ گرفتار کر کے کارڈ گرفتاری
تخلیہ مرتب کر کے جیلے حالات واقعات افسر بالا کی نوٹس میں لائی جا کر اب مذکورہ کو ہسپتال کالو خان کر کے
کنسٹیبل سہیل ہدایات مناسب ہوئی۔

Asi
24-8-23

20-12-23
MSI-P5-1K
Starz
(بیمه نامه)

این بیمه نامه از طرف شرکت بیمه ستارز به شماره قرارداد P5-1K صادر شده است.
 این بیمه نامه شامل تمام خسارتها می باشد که در طول مدت اعتبار آن در نتیجه حوادث
 غیر عمدی و ناخواسته بر روی اموال متبوع بیمه شده ایجاد شود.
 این بیمه نامه در صورت وقوع حادثه و اعلام خسارت به کارگزار بیمه کننده می تواند
 استفاده شود.
 این بیمه نامه در صورت بروز حادثه خسارت را به میزان حد تعهد این بیمه نامه
 پرداخت می نماید.
 این بیمه نامه در صورت بروز حادثه خسارت را به میزان حد تعهد این بیمه نامه
 پرداخت می نماید.

1- شرح خسارت	2- مبلغ خسارت
3- شرح خسارت	4- مبلغ خسارت
5- شرح خسارت	6- مبلغ خسارت
7- شرح خسارت	8- مبلغ خسارت

مبلغ کل خسارت: 1249
 تاریخ پرداخت: 20/12/23

این اطلاعیه جهت اعلام به کارگزاران صادر شده است.
 شماره تماس: 0304 8342045
 شماره پستی: 16202-9025760-5

30
I

03119194993
16202-9025760-5

IN THE COURT OF
MUHAMMAD KHALIL KHAN,
JUDICIAL MAGISTRATE-I, SWABI
The State vs. **Munir Ahmad**

Case F.I.N. # 1219 dated 20.12.2023 under section 506 PPC/15 of Hyderabad Habitual Arms Act, 2013 of Police Station Kalu Khan,
District Swabi


J (31)

Order
21 December 2023

Accused named above produced in custody by the I.O for recording his confessional statement under section 164/364 Cr.PC. After observing all the legal and codal formalities, accused refused to confess his guilt. The I.O also produced complainant of the instant case namely Said Arab Khan, who tendered an affidavit/compromise deed stating therein, that he does not want to press/pursue the case against the accused as the matter has been patched with the accused with the help of local elders and pardoned him in the name of Allah Almighty. He further stated that he has got no objection over the release of accused and subsequently acquittal during trial. To this effect his statement recorded and placed on file.

As the matter between the parties has been patched up and the offence is compoundable while further proceedings does serve any fruitful purpose, therefore, the application of the I.O seeking physical remand is turned down and the accused is discharged from custody under section 63 Cr.PC subject to furnishing surety bonds to the tune of Rs. 80,000/- with two sureties each in the like amount to the satisfaction of this court, otherwise, be kept in judicial lockup and be produce on 3/1/24

رائی میں
میانہ نہ رہے
تین سہ سال


Muhammad Khalil Khan
Judicial Magistrate-I, Swabi

Muhammad Khalil Khan
Judicial Magistrate-I, Swabi

OFFICE OF THE
DISTRICT POLICE OFFICER SWABI
PHONE# 0938-920050 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

K (32)

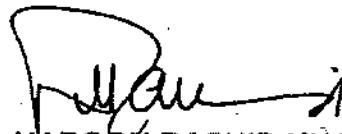
Verified to be True Copy.

SUMMARY OF ALLEGATIONS

I, Haroon Rashid Khan, District Police Officer, Swabi as competent authority am of the opinion that Constable Munir Ahmad No.1281 has rendered himself liable to be proceeded under rule 5 (2) of KPK Police Rules-1975. (Amendment 2014) for following mis-conduct:-

1. While posted at PS Utlā, he involved himself in case vide FIR No.1049 dated 20.12.2023 u/s 506/15-AA/13-KPK PS Kalu Khan.
2. Above commission/omission falls under the purview of mis-conduct is punishable under Rules 4 a & b of Police Rules 1975 amended 2014.

For the purpose of scrutinizing the conduct of the said official Mr. Ajab DSP Razaan is hereby deputed to conduct proper departmental enquiry against the aforesaid official, as contained in section 6 (I) (a) of the afore mentioned rules. The enquiry officer after completing all proceedings shall submit his verdict to this office within (7) days, Constable Munir Ahmad No.1281 is directed to appear before the enquiry officer on the date, time and place fixed by the later (enquiry officer). A statement of charge sheet is attached herewith.




HAROON RASHID KHAN (T.ST/PSP)
DISTRICT POLICE OFFICER
SWABI

No. 194 /CC/PA

Dated: 22 / 12 /2023

ATTESTED

PIO


District Police Officer, Swabi.



OFFICE OF THE
DISTRICT POLICE OFFICER SWABI
PHONE# 0938-920050 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

33

CHARGE SHEET UNDER KPK POLICE RULES-1975


Certified to be True Copy.

Whereas I am satisfied that formal enquiry as contemplated by Khyber Pakhtunkhwa Police Rules 1975 is necessary and expedient.


And whereas I am of the view that the allegations if established would call for Major/Minor penalty as defined in Rules 4 (b) a & b of the aforesaid Rules.

Now therefore as required by Rules 6 (1) of the aforesaid Rules I, Haroon Rashid Khan (T.ST/PSP), District Police Officer Swabi charge you **Constable Munir Ahmad No.1281** on the basis of statement of allegations attached to this charge sheet.

In case your reply is not received within seven days without sufficient cause it will be presumed that you have no defence to offer and ex-parte action will be taken against you.


HAROON RASHID KHAN (T.ST/ PSP)
DISTRICT POLICE OFFICER,
SWABI

ATTESTED

PIO 
District Police Officer Swabi

Chief Police Officer, Gwalior

P.O.

ATTESTED

Handwritten signature and text, possibly a name and date.

Main body of handwritten text, appearing to be a letter or official communication.

FORWARDED TO THE...

34

Handwritten text at the bottom of the page.

No. 25 /R.
DATED: 15/01/2024

SUBJECT: DEPARTMENTAL INQUIRY AGAINST FOOT CONSTABLE (FC)
MUNEER AHMAD NO. 1281.

Certified to be true

It is submitted that the departmental inquiry against the above-mentioned official was entrusted to the undersigned vide Endst: No. 194/CC/PA, dated 22.12.2023.

SUMMARY OF ALLEGATIONS:-

Constable Muneer Ahmad while posted at police station Utlā, involved himself in case FIR No. 1249 dated 20.12.2023 u/s 506/15-AA/13-KPK police station Kalu Khan.

Provided the above allegations the District Police Officer (DPO) Swabi initiated departmental inquiry against him and appointed undersigned as an inquiry-officer.

PROCEEDINGS:-

In order to establish facts, the undersigned recorded statement of FC Muneer Ahmad which is as under:

"I had fight with my cousin namely Said Arab on 20.12.2023 due to which FIR No. 1249 dated 20.12.2023 u/s 506/15-AA/13-KPK police station Kalu Khan registered against me-I also registered report a assault against my cousin in police station Kalu Khan. We have land dispute with my cousin. As Said Arab is my cousin, we have reached a compromise with the involvement of our relatives and local elders, documented on stamp paper. Now the court discharged the case."

FINDINGS:-

What findings, during the course of inquiry, were transpired are as under:

- The delinquent official is charged in FIR No. 1249 dated 20.12.2023 under sections 506 15-AA, 13-KPK at Kalu Khan police station.
- Numerous revenue complaints have been received in this office and the Kalu Khan police station against Constable Muneer Ahmad, suggesting his involvement in land grabbing.
- The delinquent official confessed during cross-questioning that several complaints and FIRs have been registered against him at different times.
- Prior to this inquiry, the undersigned conducted an enquiry against the official, the undersigned requested his transfer from Category-D Hospital Kalu Khan to Utlā police station. Although he was transferred, he absented himself from Utlā police station and he was closed to Police Line Swab.
- It is true that Said Arab is the cousin of the alleged Muneer Ahmad. They reached a compromise with the involvement of their relatives and local elders. However, his previous FIRs and complaints confirm that he does not possess good character.

ATTESTED

PIO

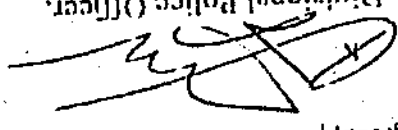
District Police Officer, Swabi

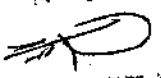
36

Prepared to be the copy

In view of the above findings, the undersigned is of the opinion that the official may be recommended for Major Punishment, if agreed, please.

RECOMMENDATION:-


Sub-Divisional Police Officer,
Kazran, Swabi.


P.O. District Police Officer, Swabi.

ATTESTED

Certified to be True Copy.

FINAL SHOW CAUSE NOTICE

M 37

I, Haroon Rashid Khan, District Police Officer, Swabi as competent authority under Police Rules 1975, hereby serves upon you, Constable Munir Ahmad No.1281, as follow:

1. While posted at PS Utla, you involved himself in case vide FIR No.1049 dated 20.12.2023 u/s 506/15-AA/13-KPK PS Kalu Khan.
2. The above commission/omission falls under the purview of mis-conduct and is punishable under Rules 4 a & b of Police Rules 1975 amended 2014.

In this connection you were charge sheeted and served with summary of allegations and SDPO Razzar was appointed to conduct proper departmental enquiry. The enquiry officer held enquiry, collected evidence, recorded statements of all concerned and submitted his findings, wherein he recommended you Constable Munir Ahmad No. 1281, for Major Punishment.

You are hereby directed to show cause of your irresponsible acts towards performing your professional responsibilities within 07 days, as to why you should not be punished in light of Police Rules 1975 (amendment 2014).

In case of none submission of your reply within 07 days of its delivery in the normal course of circumstances, it shall be presumed that you have nothing to offer in defence and ex-parte action shall be taken against you.



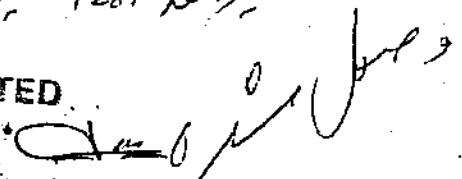
HAROON RASHID KHAN (T.ST/ P3P)
DISTRICT POLICE OFFICER,
SWABI

16202-0785562-3
03139654761
18/1/24
18/1/24

مستند پولیس (لاہور) 1281

ATTESTED

PIO
District Police Officer, Swabi.



بیان ازان غازی کا سنبل منیر احمد 1281

جناب عالی! بخوالہ شوکاژ نوٹس معروض خدمت ہوں۔ کہ کا سنبل غازی منیر احمد 1281 جو کہ سال 2012 میں ڈسٹرکٹ پولیس کا بھرتی کا سنبل ہے۔ اور اپنی ڈیوٹی نہایت ایمانداری اور جان فشانی سے سر انجام دیتا رہتا ہوں

سال 2016 میں SHO تھانہ زیدہ گوہر خان صاحب کیساتھ گنڈیوٹی سر انجام دے رہا تھا۔ کہ اطلاع ملی۔ کہ ٹوپی کے خدود میں دہشتگرد پولیس جھڑپ شروع ہے۔ جس اطلاع پر جناب SHO کیساتھ فوری طور پر جائے وقوع پہنچے ہی دہشتگرد کیساتھ نہایت دلیری سے مقابلہ کرتے ہوئے دہشتگردوں کے فائرنگ سے میں بذات خود شدید زخمی ہوا اور ایک ساتھی کا سنبل نے شہادت نوش کیا۔ جس کے بعد کی افسران بالانے حوصلہ افزائی کرتے ہوئے نقد انعامات اور سرٹیفکیٹ سے نوازہ تھا۔ لیکن وہی سرٹیفکیٹ تاحال مجھے نہیں ملے۔ جو کہ بعد میں اپ صاحبان کی مہربانی اور شفقت کی وجہ سے کئی سال گزرنے کے بعد موصول ہوئے۔ جس کی میں اپ صاحبان کی جتنی تعریف کرو کم ہے۔ اور تہہ دل سے شکر گزار ہوں۔

حال ہی میں میرا اور میرے چچا زاد بھائی سید عرب خان کے مابین گھریلو معاملات پر توں توں میں میں ہو کر سید عرب خان پہلے اور میں بعد میں تھانہ کالو خان گئے ہوئے تھے ہمارے مابین مشران مسیمان ظاہر شاہ، سید عباس باچہ، صاحبزاد باچہ، افتخار باچہ، عادل، خارش، فضل رازق باچہ اور دیگر کی مشران نے

ATTESTED.

PIO.

W. P. P. Officer, Suwat

ہمارے گھر کا مسلہ مکمل طور پر ختم کر دیا۔ اور ہم دونوں نے ایک دوسرے کے خلاف کریمنل کارروائی نہیں کرنا چاہتے تھے۔ لیکن DSP صاحب سرکل رزڈ نے محرر تھانہ کو حکم دیا کہ سید عرب اور مجھے خوات تھانہ میں بغیر کسی اندراج مقدمہ کے بند کے لیے۔ اور کی گھنٹے جس بے جا میں بند کئے رکھا اور مرزا صاحب نے سید عرب کو کہا کہ آپ مقدمہ درج کروور نہ آپ کے خلاف پولیس کی طرف سے مقدمہ درج رجسٹر کیا جائے گا۔ اور پھر آپ دونوں کی ضمانت ہی نہیں ہو سکے گی۔ وقوعہ دن کے وقت تقریباً 11 بجے رونما ہوا تھا۔ اور FIR پولیس کے کہنے پر رات گئے درج کیے گی۔ یہ سارا واقعہ تھانہ کے CCTV میں محفوظ ہوا تھا۔ ہم دونوں نے ایک رات قابل ضمانت جرم میں گزاری۔ مشران دیہہ بالا کی باز DSP صاحب کے پاس بھی گئے تھے۔ کہ ہم دو فریقین کے مابین راضی نامہ کیا ہے۔ لیکن DSP صاحب نے بات بڑھا چڑھا کر ہم نے ایک دوسرے کے خلاف مقدمہ درج کئے۔ صبح ہم دونوں نے راضی نامہ عدالت میں پیش کر کے عدالت نے ہم دونوں کو باعزت بری کئے اور فائل واپس تھانہ بھیج دیا۔ مقدمہ زیر بحث میں، ہم دونوں اس مقدمہ میں جیل نہیں گئے۔ آپ مشران دیہہ بالا سے پوچھ سکتے ہیں۔ اگر میں گناہگار ثابت ہوا تو جو سزا ہوگی منظور ہے۔

آپ کا تابع فرمان کا سنبل غازی منیر احمد 1281 پولیس لائین

ATTESTED

PIO
Police Officer, Swahl



OFFICE OF THE
DISTRICT POLICE OFFICER SWABI
PHONE# 0938-920050 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

N
40

CHARGE SHEET UNDER KPK POLICE RULES-1975

Certified to be true Copy.

Whereas I am satisfied that formal enquiry as contemplated by Khyber Pakhtunkhwa Police Rules 1975 is necessary and expedient.

And whereas I am of the view that the allegations if established would call for Major/Minor penalty as defined in Rules 4 (b) a & b of the aforesaid Rules.

Now therefore as required by Rules 6 (1) of the aforesaid Rules I, Haroon Rashid Khan (T.ST/PSP), District Police Officer Swabi charge you **Constable Munir Ahmad No.1281** on the basis of statement of allegations attached to this charge sheet.

In case your reply is not received within seven days without sufficient cause it will be presumed that you have no defence to offer and ex-parte action will be taken against you.

HAROOH RASHID KHAN (T.ST/ PSP)
DISTRICT POLICE OFFICER,
SWABI

ATTESTED

Police Officer, Swabi.

Date of Presentation of Application: 03/09/2024
Copying Fee: Nil
Total Pages: (11)
Name of Copy: Faisal Sabhan
Date of Completion of Copy: 03/09/2024
Date of Delivery of Copy: 03/09/2024



OFFICE OF THE
DISTRICT POLICE OFFICER SWABI
PHONE# 0938-920050 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

44
Certified to be True Copy.

SUMMARY OF ALLEGATIONS

I, Haroon Rashid Khan, District Police Officer, Swabi as competent authority am of the opinion that Constable Munir Ahmad No.1281 has rendered himself liable to be proceeded under rule 5 (2) of KPK Police Rules-1975. (Amendment 2014) for following mis-conduct:-

1. While posted at PS Ulla, he absented himself from duty w.e.f. 13.12.2023 till date without any leave/prior permission of the competent authority.
2. Above commission/omission falls under the purview of mis-conduct is punishable under Rules 4 a & b of Police Rules 1975 amended 2014.

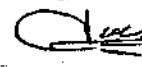
For the purpose of scrutinizing the conduct of the said official Mr. Shafiq DSP Topi is hereby deputed to conduct proper departmental enquiry against the aforesaid official, as contained in section 6 (I) (a) of the afore mentioned rules. The enquiry officer after completing all proceedings shall submit his verdict to this office within (7) days, Constable Munir Ahmad No.1281 is directed to appear before the enquiry officer on the date, time and place fixed by the later (enquiry officer). A statement of charge sheet is attached herewith.


HAROON RASHID KHAN (T.ST/PSP)
DISTRICT POLICE OFFICER
SWABI

No. 196 /CC/PA

Dated: 26/12 /2023

ATTESTED


P/O
District Police Officer Swabi.

District Police Officer, Swabi.

PRO

ATTESTED

Handwritten signature and date: 1281/21

02/10/20

Main body of handwritten text, likely a report or letter, written in Urdu.

Handwritten reference numbers: M 302/324/354/423/423, B/4 exp. 747A, 06-11-20

Handwritten text at the bottom of the main body, including a date: 1281/21

Continued on the next page

Handwritten number 49 inside a circle

Handwritten signature and date: 1281/21

1281
43

Certified to be True Copy.

DY: No. 66 /TP
DATED: 21/2/2024.

SUBJECT: DEPARTMENTAL ENQUIRY AGAINST CONSTABLE MUNIR AHMAD NO. 1281.

Memo:

It is submitted that the subject departmental enquiry against constable Munir Ahmad No. 1281 was entrusted to the undersigned vide Dy: No.196/CC/PA dated 26.12.2023 on the following acts/omission:-

1. While posted at Police Station Utla, he absented him-self from duty w.e.f 13.12.2023 till date without any leave/prior permission of the competent authority.
2. Above commission/omission falls under the purview of mis-conduct is punishable under Rules 4 A & B of Police Rules-1975 amended 2014.

PROCEEDING:

During enquiry the undersigned summoned the defaulter official constable Munir Ahmad No. 1281 heard and recorded his statement. Facts of the instant enquiry runs as following :-

1. He stated in his statement that "he was injured in an encounter with terrorists reported vide FIR No. 66 dated 06.11.2016 u/s 302/324/353/427/ ¾ Exp/7ATA , whereas his injuries are not recovered yet and had uses medicines. Further added that he is still unable to perform duty in hilly area due to injuries. Lastly he added that " he made his arrival in PS: Utla on due date at the order of the high-ups, but had not carried medicine, hence came back to home. Moreover, due to cold weather illness was increased whereat he carried out medical checkup (medical documents attached).
2. Vide DD No. 04 dated 13.12.2023 at 18:30 hrs: the defaulter constable Munir Ahmad No. 1281 made his arrival at Police Station Utla, while on the same day vide DD No. 05 dated 13.12.2023 at 19:00 hrs: PS Utla he was absented from duty.
3. Vide OB No. 00 dated 22.12.2023 he was suspended and closed to Police Lines Swabi. Next day vide DD No. 25 dated 23.12.2023 he made his arrival at Police Lines Swabi.
4. Service record of the defaulter official was perused which revealed that the defaulter constable was enlisted in Police on 12.07.2012. During service he earned the following punishments:
 - a. Absence from duty 09 days was treated as leave W/Pay vided OB No. 1219 dated 13.10.2014.
 - b. Awarded Fine of rupees-1000/- vide OB No. 147 dated 03.02.2015
 - c. Absence from duty 02 days was treated as leave W/Pay vided OB No. 1411 dated 27.10.2015.
 - d. Suspended vide OB No. 126 dated 25.01.2017 due to Involvement in case FIR No. 41 dated 18.01.2017 u/s 186/187 PPC PS: kalu Khan.
 - e. Awarded minor punishment of Censure & 03 months absence period was treated as leave W/Pay vide OB No. 260 dated 28.03.2023.

ATTESTED

FIG
District Police Officer, Swabi.

44

Certified to be True Copy.

- f. Awarded minor punishment of Forfeiture of one year approved service vide OB No. 1187 dated 13.10.2023.
- g. Placed under suspension vide OB No. 1386 dated 22.12.2023.
- h. Awarded minor punishment of Censure vide OB No. 1346 dated 14.12.2023.
- i. Awarded major Punishment of "Dismissal From Service" due to involvement in case vide FIR No. 1049 dated 20.12.2023 u/s 506/15-AA/13KPK PS: kalu Khan.
- j. In light of above facts/evidences collected from his service record, it is observed that the delinquent constable is a habitual absentee and is no more interested in service.

RECOMMENDATIONS:-

Keeping in view the above facts and circumstances, I, the undersigned as enquiry officer, am of the opinion that the allegations leveled against the delinquent constable Munir Ahmad No. 1281 are proved and he is found guilty of misconduct. Therefore, he is recommended for Major Punishment under the Police Rules-1934, if approved please.

Sub Divisional Police Officer

TOPI (Swabi)

ATTESTED

PIO

Sub Divisional Police Officer, Swabi

PMC

The delinquent officer has already been dismissed from service vide OB no. 73 dated 13-2-2024. Therefore, the enquiry may be made part of his order/enquiry.

DPO Swabi:
5/3/24



OFFICE OF THE
DISTRICT POLICE OFFICER, SWABI
PHONE# 0938-920050 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

P
45

No. 647-650 IPA.

Dated. 14 / 02 / 2024

ORDER

This order is aimed to dispose-off the departmental proceedings conducted against Constable Munir Ahmad No. 1281 of this district Police, under the Khyber Pakhtunkhwa Police Rules, 1975 (amendment 2014) vide this office No. 194/CC/PA dated 22.12.2023 on the following allegations.

While posted at PS Ulla, he involved himself in case vide FIR No. 1049 dated 20.12.2023 u/s 506/15-AA/13-KPK PS Kalu Khan.

He was issued charge sheet on the said allegations and enquiry proceedings were entrusted to SDPO Razzar under Police Rules-1975 ammended-2014 The Enquiry Officer conducted departmental enquiry, collected evidence, recorded statements of all concerned and submitted his finding report, wherein the enquiry officer recommended the defaulter Constable for Major punishment. The undersigned thoroughly perused the findings of the Enquiry Officer and issued him Final Show Cause Notice. The Final Show Cause Notice was served upon him at his home address through local Police on 18.01.2024. His reply to the Final Show Cause Notice was received, perused and he was heard in Orderly Room on 13.02.2024, but his reply was found un-satisfactory.

Keeping in view findings report of the Enquiry Officer and conduct of the defaulter Constable, the undersigned came to the conclusion that the charges levelled against him have been proved beyond the shadow of doubt.


Moreover, his service record was also checked which revealed that on several occasions he absented himself from duty and was awarded minor punishments including treatment of his absence periods as leave without pay. In the recent past he was posted at PS Ulla, with the directions to remain on duty there, but he did not obey the lawful orders of his seniors and absented himself from duty with effect from 13.12.2023. During the period of absence he involved himself in the above stated criminal case on 20.12.2023. He again absented himself from duty from Police Lines w.e. from 09.01.2024 to 06.02.2024 and w.e. from 09.02.2024 till date.

In view of situation painted above, in exercise of powers vested upon undersigned I. Haroon Rashid Khan T. ST/PSP, District Police Officer Swabi hereby, award Constable Munir Ahmad No. 1281 Major Punishment of "Dismissal from Service" with immediate effect.

Order Announced

OB No. 73

Dated: 13 / 02 / 2024


HAROON RASHID KHAN, (T. ST/PSP)
DISTRICT POLICE OFFICER
SWABI

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI.

Copies to the:

- 1 Pay Officer ✓
- 2 Establishment Clerk ✓
- 3 I/C PAL ✓
- 4 Fauji Messal Clerk ✓



✓ ✓ ✓ ✓ ✓

Government of Khyber Pakhtunkhwa
Office of the Regional Police Officer,
Mardan

Phone No. 0937-9230113, Fax No. 0937-9230115.
Email Address: - esrpomardan@gmail.com

246

To : The District Police Officer,
Swabi.

No. 675 /ES, dated Mardan Region, the 2 / 03/2024.

Subject: APPLICATION FOR RETIREMENT ON MEDICAL GROUNDS

Memo:

Reference your office Memo: Nos. 7397/EC, dated 20.12.2023 and 1177/EC, dated 28.02.2024 on the subject noted above.

Application for retirement on medical grounds in respect of Constable Munir Ahmad No. 1281 received vide above quoted reference was examined and filed by this office as he was awarded major punishment of "Dismissal from Service" being involved himself in case vide FIR No. 1049, dated 20.12.2023 u/s 506/15-AA/13-KPK Police Station Kalu Khan and his repeated absence from lawful duties.

Regional Police Officer,
Mardan.

API
C/E
22/3

Ec
Ret
DP Mardan
22/3

1439
25-03-24

ORDER.

This order will dispose-off the departmental appeal preferred by Ex-Constable Munir Ahmad No. 1281 of Swabi District against the order of the District Police Officer, Swabi, whereby he was awarded major punishment of dismissal from service vide OB No. 73 dated 13.02.2024. The appellant was proceeded against departmentally on the allegations that he while posted at Police Station Ulla found involved in a case vide FIR No. 1049 dated 20.12.2023 U/s 506/15AA-13 KPK Police Station Kaku Khan.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and the then Sub Divisional Police Officer, (SDPO) Razzar, Swabi was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities submitted his findings report to the District Police Officer, Swabi wherein he held responsible the delinquent Officer as his negligence was proved, hence, recommended him for awarding major punishment.

The District Police Officer, Swabi thoroughly perused the findings of the Enquiry Officer and issued him Final Show Cause Notice. The Final Show Cause Notice was served upon him on 12.01.2024 through local Police to which his reply was received, perused and he was heard in Orderly Room on 13.02.2024, but his reply was found unsatisfactory.

From the perusal of service record it was found that on several occasions the delinquent Officer absented himself from duties and was awarded Minor Punishment including treatment of his absence periods as leave without pay. Moreover in the recent past he was transferred to Police Station Ulla with the direction to remain on duty there, but he did not obey the lawful orders and absented himself from duty with effect from 13.12.2023. During the period of absence the delinquent Officer was also involved himself in above mentioned case. Regularly he, again absented himself from duty from Police Lines, Swabi with effect from 09.01.2024 to 05.02.2024 and 09.02.2024 till date of his dismissal.

Keeping in view finding report of the Enquiry Officer and conduct of the delinquent Officer, the District Police Officer, Swabi awarded him Major punishment of dismissal from Service vide OB No. 73 dated 13.02.2024.

ATTESTED

PIO

District Police Officer, Swabi.

47 R

Better Copy - 47

Order

This order will dispose of the departmental appeal preferred by Ex-Constable Munir Ahmad No 1281 of Swabi district against the order of District Police Officer, whereby he was awarded major punishment of dismissal from service vide OB No. 73 dated 13.02.2024. The appellant was proceeded against departmentally on the allegations that he while posted at Police Station found involved in a case vide FIR No. 1049 dated 20.12.2023 U/S /15-AA-KPK constable Kalu Khan.

Proper departmental enquiry proceedings were imitated against him. He was issued charge Sheet along with statement of allegations and then Sub Divisional Police Officer (SDPO) Razzer Shabi was nominated as Enquiry Officer. The Enquiry Officer after fulfilling corral formalities submitted his findings report to the District Police Officer Swabi wherein he held responsible the deliquescent officer as negligence was proved hence recommended him for awarding major punishment.

The District Education Officer swabi thoroughly perused the findings of the inquiry officer and issued him Final Show Cause Notice. The Final Show Cause Notice received upon him on 18.01.2024 through local police to which his reply was received perused and he has heard in orderly room on 13.02.2024 but his reply was found unsatisfactory.

From the perusal of service record it was found that on several occasions the delinquent officer absented from duties and was awarded minor punishment including treatment of his absence periods as leave without pay. Whatsoever in the recent past he was transferred to Police Station with to remain on duty there but he did not obey the lawful orders and absence himself from duty with effect from 13.12.2023. during the period of absence the deliquescent officer was also involved himself in above mentioned case.

Resultantly he again absented himself from duty from Police Line Swabi with effect from 09.01.2024 to 06.02.2024 and 09.02.2024 till date of his dismissal.

Keeping in view finding reports of the Enquiry Officer and conduct of the deliquescent officer the District Police Officer Swabi, awarded him major punishment of dismissal from service vide OB No. 73 dated 13.02.2024.

19498

48

Feeling aggrieved from the order of the District Police Officer, Swabi, the appellant preferred the instant appeal. He was summoned and heard in person in Code-IV Room held in this office on 03/06/2024.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt. As the appellant has bitterly failed to produce any evidence to justify his innocence/absence. However, it is pertinent to mention that the appellant while in the line of duty got injured in case vide FIR No. 65 dated 01/11/2016 U/S 302/324/353/4271 Y. Exp/17-ATA Police Station CTD Mardan. As a result, he is unable to perform his duties at hilly areas. It is also added that due to the head injuries, he has to take rest because of feeling pain of these injuries. In view of the above, in view of the injuries sustained by him during the line of duties coupled with length of service i.e. 17 years, 09 months and 07 days, 08 bad entry in the entire span of service and poor financial background being the sole bread earner for the whole family, the undersigned is constrained to take a lenient view of the misconduct of the appellant.

In view of the above, the undersigned, Najeeb-Ur-Rahman Bugvi, PSP being the appellate authority, hereby modify the punishment of dismissal from service and convert the same into minor punishment of stoppage of pay and increments without cumulative effect for a period of 03 years, 06 months and 01 day to service and the intervening period as well as absence period is treated as leave without pay.

(Najeeb-Ur-Rahman Bugvi) PSP
Regional Police Officer,
Mardan.

1002 Date: 23/06/2024

Copy for info to District Police Officer, Swabi, for information and
for file. Legal dated 19/03/2024. His service

ATTESTED

PIO [Signature]
District Police Officer, Swabi

Better Copy-48

Feeling aggravated from the order of the District Police Officer, swabi the appellant preferred the instant appeal. He was summoned and heard in person in orderly room held in this office on 03.04.2024.

For the perusal of enquiry file and service record of the appellant. It has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt. As the appellant has bitterly failed to produce cogent reason to justify his announce / absence. However it is pertinent to mention here that the appellant while in the line of duty got injured in case vide FIR No. 65 dated 06.11.2016 U/S 302/324/353/427/3/4, Exp/7-ATA Police Station CTD Mardan. Resultantly he is unable to perform his duty at hilly areas. It is also added that due to the said injuries he use to take rest because of feeling pain of these injuries. Hence, keeping in view his injuries sustained by him during the line of duties coupled with length of service i.e 11 years, 09 months and 07 days eight bad entry in the entire span of service and poor financial background being the sole bread earner for the entire family, the undersigned is constrained to take a lenient view of the misconduct of the appellant.

Keeping in view the above I, Mujeeb Ur Rehman Bugvi, PSP Regional Police Officer, Mardan, being the appellate authority, hereby modify major punishment of dismissal from service and convert the same into minor punishment of stoppage of three annual increments with cumulative effect for a period of three years. He is reinstated into service and the intervening period as well as absence period is treated as leave without pay.

Order announced

(najeed Ur Rehman Bugvi) PSP
Regional Police officer/Legal dated
Mardan
No. 1002/ES, dated Mardan the 23.04.2024

Copy forwarded to District Police Officer Swat for information

Necessary action w/r to his office memo No. 49 dated 13.03.2024. his service record is returned herewith.

بخدمت جناب محترم انسپکٹر جنرل آف پولیس خیبر پختونخواہ

S
49

ایئیل رحم درخواست بابت ارڈر جناب DIG صاحب مردان ربین

جناب عالی! گزارش کی جاتی ہے۔ کہ سائیل کو جناب DPO صاحب ضلع صوابی محکمہ پولیس سے برخاست کیا تھا۔ جس بابت میں سائیل نے جناب DIG صاحب ایئیل رحم درخواست دائر کی تھی۔ جس پر جناب DIG صاحب نے من سائیل کو نوکری پر دوبارہ بحال کرتے ہوئے ساتھ ہی من سائیل کا اینکریمنٹ بھی سٹاپ کئے ہیں۔ اور کچھ عرصہ سابقہ غیر حاضری کی without pay کرنے کا تحریری آرڈر جاری کیا ہے۔ جسکی تفصیل مہرالف ایئیل لکھا ہے۔

سائیل ایک نہایت ہی عریب گھرانے سے تعلق رکھتا ہے۔ لہذا من سائیل کے حل پر رحم فرما کر جناب DIG صاحب کے حکم کی نسبت مناسب احکامات جاری کر کے سائیل کے تین سال کا اینکریمنٹ بحال کرنے اور تھواریلز کرنے کا حکم صادر فرما کر مشکور اس کے علاوہ DPO صاحب من سائیل ایک اور سزا بھی بخوالہ ارڈر نمبر 10-2023-13/1187 دی ہے جس کی نسبت من سائیل نے جناب DIG کو اپیل کیا تھا لیکن ابھی تک پیشی نہیں آئی۔ علاوہ اس کے سائیل سال 2016-06-11 میں علاقہ تھانہ ٹوپی میں دوران ڈیوٹی دہشت گردوں کیساتھ جو ان مردی کیساتھ مقابلہ کرتے ہوئے شدید زخمی ہوا تھا جبکہ دوران مقابلہ میرے ساتھ میرا ایک ساتھی نے شہادت نوش کیا تھا۔ جبکہ دو نفر دہشت گرد جہنم واصل ہوئے تھے۔ سائیل ابھی تک مختلف ڈاکٹروں سے زیر علاج ہے۔ اور دو تین سرجری بھی کر چکا ہے۔ سائیل سے جو تھواریلز گئی اس کے وجہ سے میرا علاج معالجہ جاری رکھنا اور گھر کا خرچہ بھی مشکل سے چل رہا ہے۔

ہمارے لیے یہ سزا بھی کافی جو کہ میں محکمہ پولیس میں دوران ڈیوٹی زخمی ہو چکا ہوں۔ ابھی تک علاج جاری رکھنے کی وجہ سے سائیل نے تہال پر موشن کے امتحانات A1 اور B1 بھی نہیں دے سکا۔ اور وہی کے وہی کانسٹیبل کے عہدہ پر براجمان ہوں۔ اور میرے ساتھ بھرتی شدہ کانسٹیبل نے صحت کی تندرستی پر موشن کے امتحانات دے کر عہدار ہوئے ہیں۔

بزرگیہ رحم درخواست کی جاتی ہے کہ سائیل کے حال پر رحم فرما کر سائیل کی تنخواہ ریلیز کرنے اور تین سال کے اینکریمنٹ بحال کرنے کا حکم صادر فرما کر مشکور فرمادیں۔

15-5-2024

العارض

اپکا تابع حکم کانسٹیبل غازی منیر احمد 1281 پولیس لائن صوابی



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.
Phone: 011 2710077

T (50)

No. M. 1844 / 24.

Dated Peshawar the 30/ 07/ 2024.

To: The Regional Police Officer,
Mardan.

Subject: REVISION PETITION
Memo

Certified to be True Copy.

Please refer to your office memo No. 1517/IS, dated 27.05.2024.

The Competent Authority has examined and filed the revision petition submitted by FC Muzir Ahmad No. 1281 of district Swabi against the punishment of stoppage of three annual increments without cumulative effect for a period of 03 years awarded by Regional Police Officer, Mardan vide Order (Encl): No. 1002/IS, dated 23.01.2024 being time barred.

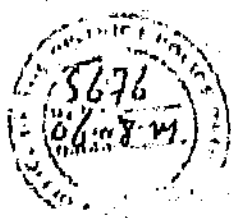
The applicant may please be informed accordingly.

[Handwritten Signature]
27/7/24

(AFSAR IJAZ)
Registrar,
for Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

[Handwritten Signature]

OB/Ec



[Handwritten Signature]
27/07/24

ATTESTED

PIO
District Police Officer, Swabi
718724

OB 728
07.08.24

Better Copy (50)

OFFICE OF THE DISTRICT
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA

Central Police officer
Dated Peshawar the 30.07.2024

No. 1844/24

To

The Regional Police Officer

Mardan

Subject: REVIEW PETITION:

Please refer to your office 1512/ES, dated 27.05.2024

The Competent authority has examined and filed the Revision petition submitted by HC Munir Ahmad No 1281 of District Swabi against the punishment stoppage of above annual increments without cumulative effect for a period of 3 years awarded by regional Police Officer, Mardan vide order Endst No. /1002/ES dated 23.04.2024 being time barred.

The appellant may please be informed accordingly.

Sd

(AFSAR JAN)

Registrar

Inspector General of Police
Khyber Pakhtunkhwa Peshawar

STE

OFFICE OF THE
DISTRICT POLICE OFFICER, SWABI
PHONE# 0938-920053 FAX# 0938-920054.
EMAIL: dpo_swabi@yahoo.com.

No. 2100 /EC, dated Swabi the 28-4 /2024

To: The Regional Police Officer,
Mardan.

Subject: MEDICAL BOARD CASE REFERRED TO CENTRAL POLICE
OFFICE PESHAWAR.

Memo:

Kindly refer to your office Endst: No. 997/ES, dated 22.04.2024 on the subject noted above.

It is submitted that no case of any officer/ officials have been referred to Central Police Office, Peshawar from this District. However, the cases of the following officials have been sent to your good office for constitution of regional level committee to finalize their cases.

Their requisite information is submitted herewith on prescribed proforma as desired, please.

S #	Rank, Name & No.	District/ Units	Date of Birth	Date of Enlistment	Service till date	Age till date
1.	ASI Sadiq Zaman No. 915	Swabi	12.03.1978	26.01.2002	22 years 03 months 0 days	46 years 01 months 14 days
2.	FC Saddam Hussain No. 832	Swabi	15.03.1988	25.07.2007	16 years 09 months 01 days	36 years 01 months 11 days
3.	FC Sherin Rahman No. 592	Swabi	07.01.1974	12.06.1993	30 years 10 months 14 days	50 years 03 months 19 days
4.	FC Munir Ahmad No. 1281	Swabi	04.02.1993	12.07.2012	11 years 09 months 14 days	31 years 02 months 22 days
5.	FC Shehzad No. 71	Swabi	03.04.1985	11.03.2004	20 years 01 months 15 days	39 years 23 days
6.	FC Zahir Ullah No. 03	Swabi	15.01.1971	21.12.1995	28 years 04 months 05 days	53 years 03 months 11 days
7.	FC Bakhtawar Sihan No. 1403	Swabi	05.02.1987	18.05.2007	16 years 11 months 08 days	37 years 02 months 21 days
8.	FC Javed Ali No. 1162	Swabi	01.01.1988	29.06.2012	11 years 09 months 28 days	36 years 03 months 25 days

(HARDON RASHID KHAN) PSP
DISTRICT POLICE OFFICER,
SWABI

VAKALAT NAMA

NO. _____/2024

IN THE COURT OF KP Service Tribunal, Peshawar

Munir Ahmad (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Police Department (Respondent)
(Defendant)

I/We, _____

Do hereby appoint and constitute **TAIMUR ALI KHAN, ADVOCATE HIGH COURT AND SHAKIR ULLAH TORANI ADVOCATE**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2024

[Signature]
(CLIENT)

ACCEPTED

[Signature]
TAIMUR ALI KHAN
Advocate High Court

BC-10-4240
CNIC: 17101-7395544-5
Cell No. 03339390916

[Signature]
SHAKIR ULLAH TORANI
Advocate Peshawar
BC-22-4994
03409146056