


# FORM OF ORDER SHEET

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

**Appeal No. 715/2024**


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/05/2024	<p>The appeal of Mr. Muhammad Asad resubmitted today by Mr. Mir Zaman Safi Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad 27.06.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Muhammad Asad received today i.e on 20.05.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.


- 1- Copy of reply to charge sheet is incomplete be completed.
- 2- Copy of departmental appeal attached with the appeal is unsigned.


No. 55 /Inst;/2024/KPST,

Dt. 21/05 /2024.

  
21/5/24  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mir Zaman Safi Adv.  
High Court Peshawar.

  
Re - Submitted after compliance.

  
29/5/2024

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

APPEAL NO. 715 /2024

MUHAMMAD ASAD

VS

POLICE DEPTT:

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APPELLANT

THROUGH:

  
MIR ZAMAN SAFI  
ADVOCATE

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

APPEAL No. 715 /2024

Muhammad Asad, Constable No. 1971/ Platoon No.42,  
SSU (CPEC) Upper Kohistan.....APPELLANT

VERSUS

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

.....RESPONDENTS

**APPEAL UNDER SECTION- 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 29.11.2023 WHEREBY MINOR PENALTY OF FORFEITURE OF TWO ANNUAL INCREMENTS HAS BEEN IMPOSED UPON THE APPELLANT AND AGAINST THE IMPUGNED APPELLATE ORDERS DATED 22.01.2024 & REJECTION ORDER OF REVISION PETITION DATED 03.04.2024 (COMMUNICATED TO THE APPELLANT ON 24.04.2024) WHICH WERE REJECTED ON NO GOOD GROUNDS.**

**PRAYER:**

That on acceptance of this service appeal, the impugned orders dated 29.11.2023, 22.01.2024 and 03.04.2024 may very kindly be set aside and the respondents be directed to restore the annual increments of the appellant w.e.f 29.11.2023. Any other relief which this august Tribunal deems fit may also be awarded in the favor of appellant.

**R/SHEWETH:**

**ON FACTS:**

*Brief facts giving rise to the present appeal are as under:-*

1. That appellant is the employee of respondent department and is serving as Constable No.1971 in Platoon No.42 SSU (CPEC) Upper Kohistan, Mansehra quite efficiently and up to the entire satisfaction of his superiors.
2. That appellant while performing his duty as Constable in Platoon No.42 at his concerned place of duty was affected by serious illness. That after detailed check up of the said illness the appellant was referred to the Ayub Medical Complex Abbottabad for proper treatment regarding which the

appellant informed his Platoon Incharge Inspector Abdur Rauf Khan through whatsapp. That after proper consultation the doctor concerned advised the appellant for complete bed rest for fourteen (14) days. Copies of the medical prescriptions are attached as annexure.....A.

3. That after recovery from the said illness the appellant once again started performing his duty at the concerned station with all zeal and zest. That after the lapse of almost 9/10 months the respondent No.3 served the appellant with charge sheet and statement of allegations vide dated 02.10.2023 with the baseless allegations of submission of fake medical documents which the appellant properly replied alongwith documentary proofs and denied all the allegations leveled against him. Copies of the charge sheet/statement of allegations and reply are attached as annexure.....B & C.
4. That astonishingly the respondent No.3 issued the impugned order dated 29.11.2023 whereby minor of forfeiture of two annual increments with cumulative effect has been imposed upon the appellant. Copy of the impugned order is attached as annexure.....D.
5. That the appellant feeling aggrieved preferred departmental appeal before the respondent No.2 but the same has been rejected vide appellate order dated 22.01.2024. Copies of the Departmental appeal and appellate order are attached as annexure.....E & F.
6. That the appellant further aggrieved preferred revision Petition before the respondent No.1 which has also been rejected vide order dated 03.04.2024 which was communicated to the appellant on 24.04.2024 through via whatsapp. Copies of the revision petition and rejection order dated 03.04.2024 are attached as annexure.....G & H.
7. That appellant feeling aggrieved and having no other adequate remedy but to file the instant service appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned orders dated 29.11.2023, 22.01.2024 and 03.04.2024 are against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent department in accordance with law and rules on the subject noted above and as such the respondents violated Article-4 and 25 of the Constitution of Islamic Republic of Pakistan, 1973.

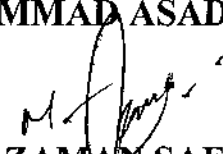
- C- That the respondent department acted in arbitrary and malafide manner while issuing the impugned order dated 29.11.2023 which is not tenable in the eye of law and the same is liable to be set aside.
- D- That the appellant properly informed his incharge platoon regarding his illness as well as sent him hospital chit through whatsapp and as such proper roznamcha/daily report was registered by the concerned incharge but despite that the authority concerned issued the impugned order dated 29.11.2023 which is not tenable in the eye of law and the same is liable to be set aside.
- E- That the appellant has not been properly associated in the inquiry neither statements of the concerned doctor has been recorded, therefore, the impugned order dated 29.11.2023 is not tenable in the eye of law.
- F- That as per rule the respondents was bound to prefer the appellant at the same time for second medical opinion regarding genuineness of his illness but the respondents were kept silent and after the lapse of 9/10 months charge sheeted the appellant which is clear violation of the law and rules ibid.
- G- That the impugned order dated 29.11.2023 is violative of the principle of natural justice.
- H- That the impugned order dated 29.11.2023 is also violative of the Fundamental Rule-29; therefore, the same is not tenable and liable to be set aside.
- I- That no chance of personal hearing/defence has been provided to the appellant, hence the impugned order dated 29.11.2023 is violative of the principle of "Audi Alteram partem".
- J- That the appellant seeks permission to advance any other ground at the time of hearing.

It is, therefore, most humbly prayed that the appeal of appellant may be accepted as prayed for.

Dated: 20.05.2024.

APPELLANT

MUHAMMAD ASAD

THROUGH:   
MIR ZAMAN SAFI  
ADVOCATE

**CERTIFICATE:**

It is, certified that no other earlier appeal was filed between the parties.

  
**DEPONENT**

**LIST OF BOOKS:**

- 1- CONSTITUTION OF PAKISTAN, 1973
- 2- SERVICES LAWS BOOKS
- 3- ANY OTHER CASE LAW AS PER NEED

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

APPEAL NO. \_\_\_\_\_/2024

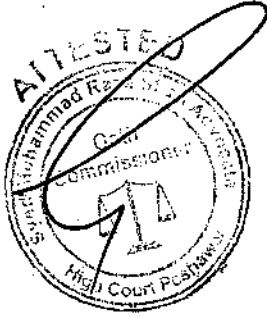
MUHAMMAD ASAD


VS

POLICE DEPTT:

**AFFIDAVIT**

I **Mir Zaman Safi**, Advocate High Court, Peshawar on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **service appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.



  
MIR ZAMAN SAFI  
Advocate  
High Court, Peshawar





Handwritten notes: "Refer to ART/SSM to have laboratory tests done in Islamabad/Health Services" with a signature and date "1/1/16".

Handwritten notes: "Needs surgery" and "Paracetamol 650mg; Tablets".

Printed labels: "Referral:", "Review:", "Response:"

Handwritten notes: "Paracetamol 650mg" and "C. Nore S".

Handwritten notes: "Hypertension" and "2. Nore S".

Printed labels: "Provisional Diagnosis:", "Treatment:", "Allergies if any:"

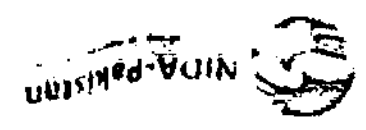
Handwritten note: "Hypertension".

Printed labels: "Chief Complaints:", "Clinical Findings:", "Physical Examination:", "Vital Signs:", "Investigations:", "Treatment:", "Allergies if any:", "Provisional Diagnosis:", "Treatment:", "Allergies if any:"

Handwritten notes: "Nore S" and "Nore S".

Form fields: "Patient's Name", "Age", "Sex", "Address", "Date", "S No.", "District", "Health Facility", "Referral/Husband's Name", "Monthly OPD S. No." with handwritten entries.

Printed text: "OUTDOOR PATIENT TICKET (OPD)"



Handwritten text: "A-6" inside a circle.

Medical Officer  
Ayub Medical Complex  
Abbottabad

Handwritten notes at the top right, including "D.H. ...", "R/S ...", and "R/S ...".

Handwritten notes in the middle left, including "R/S ...", "R/S ...", and "R/S ...".

Handwritten notes in the middle right, including "R/S ...", "R/S ...", and "R/S ...".

Handwritten notes below the middle left section.

Handwritten notes below the middle left section.

Handwritten notes below the middle left section.

Handwritten notes on the right side, including "R/S ...", "R/S ...", and "R/S ...".

OPD Prescription form  
M. A. S. H. R. A. T.  
AYUB MEDICAL INSTITUTION

(7)

INFINIX NOTE 7 LITE

B-8

Disciplinary Action

I, Superintendent of Police, Admin & Minority, Special Security Unit (CPEC) Peshawar as a competent authority, am of the opinion that Constable Asad No. 1971 of SSU (CPEC), has rendered him-self liable to be proceeded against under the provision of Police Disciplinary Rules-1975.

STATEMENT OF ALLEGATION

"That Constable Asad No. 1971 had submitted medical prescriptions for 14 days of medical rest to his senior officer, upon verification from the concerned hospital, it was determined to be fraudulent & counterfeit. Being part of the Disciplined Force, this act of his is against the Police Rules & shows gross misconduct on his part".

For the purpose of scrutinizing the conduct of said accused with reference to the above allegations an enquiry is ordered and Mr. Muhammad Saeed Khan DSP Hazara Region 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. 4658 /EC, dated Peshawar the 02/10/2023.

02-10-2023

1. Enquiry Officer.
2. Official Concerned.

ACKNOWLEDGED

(9)

CHARGE SHEET

I, Superintendent of Police, Admin & Minority Wing, Special Security Unit (CPEC), Peshawar, as competent authority, hereby charge that Constable Asad No. 1971 of SSU (CPEC), with the following irregularities.

"That you Constable Asad No. 1971 had submitted medical prescriptions for 14 days of medical rest to your senior officer, upon verification from the concerned hospital, it was determined to be fraudulent & counterfeit. Being part of the Disciplined Force, this act of yours is against the Police Rules & shows gross misconduct on your part".

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 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.

02-10-2023

ATTESTED



10/11

اپنی حاضری کی رپورٹ جائے تعیناتی پر کی۔  
اس دوران تقریباً 10 ماہ گزر گئے ہیں اب مجھے جناب کی طرف سے چارج شیٹ موصول ہوئی ہے  
کہ آپ نے جو میڈیکل رپورٹ تھوڑے متعلقہ ہسپتال سے Unverified ہوا ہے۔  
جناب عالی! میں نے جو OPD کی چٹوں کا حوالہ دیا ہے ان پر باقاعدہ دوائی تحریر کی ہوئی ہے  
میڈیکل ریست تحریر کیا ہوا ہے اور ساتھ متعلقہ ہسپتال کی Stemp (مہر) بھی لگی ہوئی ہے۔ نہ تو  
میں نے اپنے پاس سے یہ میڈیکل لکھا ہے اور نہ ہی میں ایسا کر سکتا ہوں اور نہ ہی ایسا کرنے کا سوچ  
سکتا ہوں نہ تو میں نے اپنے آفران سے دھوکہ کیا ہے اور نہ ہی اپنے حکم سے مجھے میڈیکل ریست  
ایوب میڈیکل کمپلکس سے جاری کیا گیا جو کہ اور بجیل ہے اگر اب اس کی تصدیق نہیں ہوتی تو یہ  
بات میری سمجھ سے بالاتر ہے۔

استدعا ہے کہ انصاف کے تقاضے پورے کرتے ہوئے مجھے اس چارج شیٹ سے  
مبرا فرمایا جائے۔ سائل آپ کی اقبال بلندی کے لیے دعا گو رہے گا۔

المرقوم: 25 اکتوبر 2023ء

Asad

ارض

کاشمیل اسڈنمبر 1971/SSU CPAC پلاٹون نمبر 42 ضلع مانسہرہ۔

حال اپر کوہستان۔

شناختی کارڈ نمبر: 1-13503-6542409

رابطہ نمبر: 0342-9084471

Asad  
D.S.P. north

ATTESTED

D-11



OFFICE OF THE COMMANDANT  
SPECIAL SECURITY UNIT (SSU)  
KHYBER PAKHTUNKHWA POLICE  
CENTRAL POLICE OFFICES, S.A.Q ROAD, PESHAWAR CANTT (PIL: 091-9211056)

No. 5706-10 /EC,

dated Peshawar the 29 / 11 / 2023.

ORDER

This order will dispose the formal departmental enquiry against Constable Muhammad Asad No. 1971 of Special Security Unit (CPEC).

Brief facts of the case are that Constable Muhammad Asad No. 1971 while posted at District Upper Kohistan had submitted medical prescriptions for 14 days of medical rest to his senior officer, upon verification from the concerned hospital, it was determined to be fraudulent & counterfeit.

In this regard, proper departmental proceeding was initiated against him. He was issued charge sheet and summary of allegations vide this office Endst: No. 4658/EC, dated 02.10.2023 and Mr. Muhammad Saced DSP Hazara Region was nominated as enquiry officer to conduct inquiry into the matter and submit his findings report. After completion of all codal formalities, EO reported that the charge sheet was served upon the alleged constable to which he replied that he was ill and went to Ayub Medical Teaching Hospital for treatment, where after proper check-up he was advised 14 days medical rest, in support of which he also produced medical prescriptions. The inquiry officer further added that the same medical prescriptions were sent to Ayub Medical Teaching Hospital for verifications which were returned as fake & bogus vide ATH letter No. 9025, dated 26.07.2023. Thus, the enquiry officer did not found his reply satisfactory and recommended that him for suitable punishment.

Later on he was issued/served with final show cause notice vide this office No. 5239/EC. dated 06.11.2023 to which he replied same as above. He was also heard in person in orderly room held on 07.11.2023 and given ample opportunity to prove himself innocent of the charges leveled against him but he failed to satisfy the undersigned.

Keeping in view all the above facts and recommendation of enquiry officer, as well as material available on record, the above named Constable was found guilty of the gross misconduct. Therefore, he is hereby awarded minor punishment of "forfeiture of two annual increments with cumulative effect" and given last warning to be careful in future with immediate effect.

OB No. 1508  
Dated 29/11/2023

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

29-11-2023

- Copy of the above is forwarded for information to the:
1. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
  2. PA to Deputy Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
  3. Accountant, SRC & OASI SSU (CPEC) HQrs.

E-12

اپیل بنام کمانڈنٹ صاحب ایس۔ ایس۔ یو (سی پیک) خیبر پختونخواہ پشاور

بیماری بحوالہ آرڈر نمبر 5706 OB NO 1508 مورخہ 29-11-2023 جاریہ جناب فضل  
منیف SP صاحب ایس این ایف خیبر پختونخواہ پشاور جس میں سائل کو  
Forfeiture of two annual increments with cumulative effect کی سزا دی گئی ہے۔  
جناب عالی!

معروض خدمت ہوں کہ سائل کی نوکری 4 سال ہے سائل 31-12-2019 کو محکمہ پولیس SSSU سی  
پیک میں بھرتی ہوا۔ ریکروٹ کورس مکمل کرنے کے بعد سائل نے احسن طریقہ سے اپنی ڈیوٹی پلانوں نمبر 42 ضلع ہنسروہ  
میں سرانجام دی ہے۔ دوران ڈیوٹی سائل ضلع اپر کوہستان ٹرنالہ چیک پوسٹ پر تعینات تھا۔ کہ اس دوران مورخہ  
11-01-2023 کو شدید بیمار ہوا اور علاج معالجہ کی غرض سے پلانوں نمبر 42 کے روزنامہ سے روادگی کر کے تحصیل  
ہیڈ کوارٹر ہسپتال ماسوا آیا جہاں پر ڈاکٹر صاحب نے بعد چیک اپ سائل کو ATH ایبٹ آباد ریفر کیا جہاں پر سائل نے  
OPD میں ڈاکٹر صاحب کو چیک اپ کروایا بعد چیک اپ ڈاکٹر صاحب نے سائل 14 یوم Complete  
Home Bedrest تحریر کر کے دیا جو سائل نے باقاعدہ اسپیکلر مہاروف خان کینی کمانڈر ضلع اپر کوہستان کو بذریعہ  
ڈس اپ بھیجا جنہوں نے P-42 کے روزنامہ سے روادگی کر کے ہدایت کی کے بعد گزارنے میڈیکل ریست اپنی حاضری کو  
جائے تعیناتی پر یعنی ہائیں۔ سائل نے بعد اختتام میڈیکل ریست P-42 کے روزنامہ میں حاضری کی رپورٹ کی اور  
جائے تعیناتی ٹرنالہ چیک پوسٹ چلا گیا۔ بعد ازاں مجھے مورخہ 07-11-2023 کو حکمانہ انکوائری کی چارج شیٹ  
نسبت Unverified Medical Rest موصول ہوئی۔

عالیجاہ میں نے جو میڈیکل ریست دیا تھا وہ Original تھا تو میں نے اس میں کوئی جعل سازی فراڈ اور دھوکہ کیا ہے  
مجھے جو میڈیکل ریست ATH ہسپتال سے جناب ڈاکٹر صاحب نے دیا تھا میں نے ہو بہو ہی منسلک کر دیا ہے۔

استدعا ہے کہ انصاف کے تقاضے پورے کرتے ہوئے سائل کی Forfeiture of two annual increments with cumulative effect  
کے دوڑوں کی سزا کو قلمدم کر کے سائل کے دوڑوں  
Increments بحال کرنے کا حکم صادر فرمایا جاوے۔ سائل آپ جناب کی اقبال بلندی کے لئے تادمعا کر رہا ہے۔

الرقوم: 20-12-2023

ارضی

کامیٹل محمد اسد نمبر 1971 پلانوں نمبر 42 ضلع ہنسروہ ایس۔ ایس۔ یو سی پیک خیبر پختونخواہ پشاور

موبائل نمبر: 0342-9084471



09-01-2024

(MOHAMMAD ZAFAR ALI)  
COMMANDANT,  
Special Security Unit (SSU) (CPEC),  
Khyber Pakhtunkhwa, Peshawar

Copy of the report...  
SP Admn & Min...  
PA to Comm...  
PA to Dy Comm...  
Official...  
Khyber Pakhtunkhwa, Peshawar

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.

During the course of personal hearing, the applicant failed to prove himself innocent of the charges leveled against him. Furthermore, he also confessed that he has made a mistake & will not repeat it again. Also 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 exists to interfere in same.

Feeling aggrieved against the impugned order of SP Admn & Min (CPEC), Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 11.01.2024.

In the light of recommendation of enquiry officers and other material available on the record, he was awarded minor punishment of "forfeiture of one annual increment with cumulative effect" vide order No. 5706-10/B.C. dated 29.11.2023.

This order will dispose of the formal departmental appeal preferred by commandant Muhammad Asad No. 1971 of Special Security Unit (CPEC) against the order of SP Admn & Min (CPEC), wherein he was awarded minor punishment of "forfeiture of two annual increments with cumulative effect" on the allegations that he while posted at Upper Kohistan had submitted medical prescriptions for 14 days of medical rest to his senior officer. Upon verification from the concerned hospital, it was determined to be fraudulent & counterfitted.

In this regard, proper departmental inquiry was carried out. He was unaided/assisted with charge sheet and summary of allegations. After completion of enquiry, the enquiry officer reported that the accused contended to prove himself innocent of the charges leveled against him. Thus, the enquiry officer recommended him for suitable punishment.

ORDER

Office of the Commandant  
Special Security Unit (SSU)  
Khyber Pakhtunkhwa Police  
General Police Office, I.A.Q Road, Peshawar Cantt. (74 001-01059)



F-12

No. 255-58/NC dated Peshawar the 22/01/2024

6-14

## اپیل بنام انسپکٹر جنرل صاحب خیبر پختونخواہ پشاور۔

نامہ اراضی بحوالہ آرڈر نمبر 5706 ادلی نمبر 1508 مورخہ 29-11-2023 جاریہ جناب

فضل ضف ISP ایس ایس سی ایک خیبر پختونخواہ پشاور جس میں سائل کو For

Future Two Annual Increments with Cumulative Effect

بزا دی گئی ہے۔

جناب عالی!

معرض خدمت ہوں کہ سائل کی نوکری چار سال ہے سائل  
31-12-2019 کو محکمہ پولیس SSU سی پیک میں بھرتی ہوا ریکروٹ کورس مکمل کرنے کے بعد  
سائل نے احسن طریقے سے اپنی ایوانی پائلون نمبر 45 ضلع ماسموہ میں سرانجام دی ہے دوران ڈیوٹی  
سال اپر کوہستان ٹرنالہ چیک پوسٹ پر تعینات تھا کہ اس دوران مورخہ 11-01-2023 کو  
شدید بیمار ہوا اور علاج معالجہ کی مرض سے پائلون نمبر 42 کے روزنامچے سے روائگی کر کے تحصیل ہینڈ  
کوارٹر ہسپتال داسوا آیا جہاں پر ڈاکٹر صاحب نے بعد از چیک اپ سائل کو ATH ایبٹ آباد ریفر کیا  
جہاں پر سائل نے OPD میں ڈاکٹر صاحب کو چیک اپ کروایا بعد از چیک اپ ڈاکٹر صاحب نے  
سائل کو 14 یوم Complete Home Bed Rest تحریر کر کے دیا جو سائل نے باقاعدہ  
انسپکٹر میڈیال رائف خان کپنی کمانڈر ضلع اپر کوہستان کو بذریعہ وائس ایپ بھیجا جنہوں نے P42 کے  
روزنامچے سے روائگی کر کے ہر ایت کی کہ بعد گزارنے میڈیکل ریسٹ اپنی حاضری کو جائے تعیناتی پر  
یعنی بنالی سائل نے بعد امتحان میڈیکل ریسٹ P42 کے روزنامچے میں حاضری کی رپورٹ کی اور  
جائے تعیناتی ٹرنالہ چیک پوسٹ چلا گیا بعد ازاں مجھے 07-11-2023 کو حکمانہ انکوٹری چار  
شیٹ نسبت Unverified میڈیکل ریسٹ موصول ہوئی۔

عالیجا! جو میں نے میڈیکل ریسٹ دیا تھا وہ اور بجٹل نہ ہی میں نے کوئی جعل سازی فراڈ یا دھوکہ کیا

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0342-9084471: ریفونڈ نمبر

پیشکش شدہ سروس نمبر 1971 تا 42 نمبر 42 سروس نمبر SSU کے تحت رجسٹرڈ ہو چکا ہے اور پتہ اور

رہائشی

2024ء، 20، 120

یہ سروس نمبر صرف اس کے لئے ہے اور اس کے لئے

کوئی اور سروس نمبر نہیں ہے۔

نو - of Two Annual Increments with Cumulative Effect

Future کو سروس نمبر کے لئے ہے اور اس کے لئے

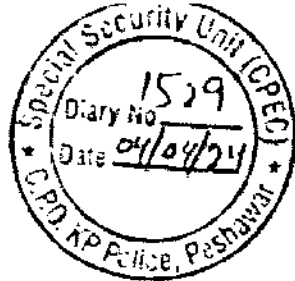
کوئی اور سروس نمبر نہیں ہے۔

22-01-2024 مورخہ 255-58 نمبر 58-58 مورخہ 22-01-2024 کو

کوئی اور سروس نمبر نہیں ہے اور اس کے لئے

کوئی اور سروس نمبر نہیں ہے اور اس کے لئے

(15)



H (16)

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

No. S 947 /24, dated Peshawar the 03 / 04 2024

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 Constable Muhammad Asad No. 1971 of SSU (CPEC), against the punishment of forfeiture of two (02) annual increment with cumulative effect awarded by SP Admin & Minority SSU (CPEC) vide Order Endst: No. 5706-10/EC, dated 29.11.2023 being badly time barred.

The applicant may please be informed accordingly.

SP/Admin: EC

*[Handwritten Signature]*  
3/4/24

(AFSAR JAN)  
Registrar

For Inspector General of Police,  
Khyber Pakhtunkhwa Peshawar

in

EC

for n/a as per rates

*[Handwritten Signature]*

Comdt: SSU  
4/4/2024

*[Handwritten Signature]*  
SP/A  
09/04/24

ATTACHED

17

24 April 2024

⇒ Forwarded



OFFICE OF THE  
INSPECTOR GENERAL OF PUBLIC  
ADMINISTRATION  
Central Public Office, Pekanbaru

No. 947 24 April 2024

To: The Commandant,  
Special Security Unit (SPK)

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6:36 pm



OFFICE OF THE  
INSPECTOR GENERAL OF PUBLIC  
ADMINISTRATION  
Central Public Office, Pekanbaru

No. 947 24 April 2024

To: The Commandant,  
Special Security Unit (SPK)

Subject: REVISION PERMITS

The Inspector General has examined and filed the revision permits submitted by Commander Muhammad Anas No. 1971 of 2021 (SPK) against the issuance of licenses of the (RC) rental attachment with completed effect awarded by Mr. Adnan A. Marzuki SA (SPK) with Order Letter No. 3700-10 LC, dated 20 11 2021 being duly long passed.  
The applicant may please be received accordingly.

SP/Adm- EC

*[Signature]*  
14 APR 2024

**INSAN JANI**  
Inspector  
Central Public Office, Pekanbaru

ATTENDED

EC  
for 1/2 at perisiter

*[Signature]*

Com. SSC  
4/24/2024

*[Signature]*  
09/04/24

6:36 pm

**VAKALATNAMA**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

OF 2024

Muhammad Asad

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Police Deptt:

(RESPONDENT)  
(DEFENDANT)

I/We Muhammad Asad

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, Peshawar** 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 cost. 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.

Dated. 17 / 05 / 2024

Asad  
CLIENT

Mir Zaman Safi  
**ACCEPTED**

**MIR ZAMAN SAFI**  
**ADVOCATE**

OFFICE:

Room No.6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, G.T Road,  
Hashtnagri, Peshawar.  
Mobile No.0333-9991564  
0317-9743003