


FORM OF ORDER SHEET

Court of _____

Appeal No. 2170/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/10/2024	<p>The appeal of Mr. Said Wali presented today by Mr. Abdul Samad Durrani Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 05.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. ~~2170~~ /2024

Said Wali, Constable Belt #. 1722 Kurram Region 2 CTD.
(Appellant)

VERSUS

DIG Of Police CTD, Khyber Pakhtunkhwa & Another.
(Respondents)

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Through

Appellant

ABDUL SAMAD DURRANI

Advocate High Court

BC-12-3479

Office: A-13, Nasir

Manson(Chinar Buildig) Shuba

Bazar, Peshawar City

CNIC # 17301-9592293-5

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1

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 2170 /2024

Said Wali, Constable Belt #. 1722 Hangu Bypass CTD Chowki,
CTD Kurram Region 2, Son Of Said Muhammad Resident of
Mengal Abad Near Badsha Gul Kaly, Mandani, Tehsil Tangi
District Charsadda.

(Appellant)

VERSUS

1. Deputy Inspector General Of Police CTD, Khyber
Pakhtunkhwa.
2. Superintendent of Police CTD, Kurram Region.

(Respondents)

**APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE ORDER
DATED 05.08.2024, WHEREBY THE APPEAL
OF THE APPELLANT WAS DISMISSED
WHICH WAS FILED AGAINST THE
IMPUGNED ORDER DATED: 08.05.2024, VIDE
WHICH THE APPELLANT HAS BEEN
AWARDED MAJOR PUNISHMENT OF
DISMISSAL FROM SERVICE.**

Prayer in Appeal: -

On acceptance of this appeal both impugned
Office Order No. 810/EC/CTD, dated
08.05.2024 & impugned Office Order No.
14351/EC, Dated: 05.08.2024 may please be set-
aside and the appellant may please be re-
instated in service with full back wages and
benefits of service.

Respectfully Submitted:

Compendium of the facts from which the present appeal
arises, are as under:-

1. That the appellant was appointed as Constable in CTD Vide Office Order, OB No. 431-33, Dated: 21.12.2022 at serial No. 06 of the said order. (Copy of Appointment Order Vide Office Order, OB No. 431-33, Dated: 21.12.2022 is attached as Annexure "A")
2. That ever since his appointment, the appellant was performing his duties as assigned to him with zeal and devotion and there was no complaint whatsoever regarding his performance. It is pertinent to mention here that during his entire service, the performance of the appellant remained commendable.
3. That the appellant was got ailment in the year 2023 and diagnosis Anxiety, Depression & Tension for which the doctors advised bed rest to appellant in this regard the appellant informed his high ups. (Copy of Medical Prescription/ Record is attached as Annexure "B")
4. That enquiry proceeding regarding the absence of appellant was initiated without informing the appellant furthermore, the appellant was not served with the charge sheet and the proceeding along with the enquiry report is false and mala-fide submitted. It is pertinent to mention here that the final show cause notice was served upon the appellant which was duly replied along with the medical reports of the appellant but the inquiry officer totally negate the version of the appellant and passed the impugned order vide Office Order No. 810/EC/CTD, Dated: 08.05.2024 vide which the appellant was awarded a major penalty of dismissal from service illegally. (Copies of Final Show cause Notice, Reply to Showcause, Inquiry Report and impugned Office Order No. 810/EC/CTD, Dated: 08.05.2024 are attached as Annexure "C", "D", "E" & "F")

5. That felt aggrieved from the impugned order of the enquiry officer the appellant filed a departmental appeal before the authority concerned which was also rejected Vide Office Order No. 14351/EC, Dated: 05.08.2024. (Copy of Departmental Appeal, & Office Order No. 14351/EC, Dated: 05.08.2024 are attached as Annexure "G" & "H")
6. That after the recovering from ailment the appellant once again diagnose Anxiety, Depression & Tension for the reason earlier no proper treatment continued by the appellant due to jobless in this severe poverty the appellant visited the hospital wherein appellant was advised complete bed rest. It is pertinent to mention here that after feeling little bit well and improvement the appellant approached to the Respondent No. 1 for taking the information in respect of the departmental appeal so filed by the appellant already mentioned above wherein the appellant was handed over with impugned Office Order No. 14351/EC, Dated: 05.08.2024 vide which Respondent No. 1 dismissed the departmental appeal of the appellant and maintain the order of the enquiry officer / Respondent No. 2 dated: 08.05.2024.
7. That the appellant having no other adequate remedy but to challenge the validity of the impugned Office Order No. 810/EC/CTD, Dated: 08.05.2024 & Office Order No. 14351/EC, Dated: 05.08.2024 by filing the instant appeal on the following grounds amongst others:-

(9)

Grounds of Appeal:

- A. That the appellant has not been treated in accordance with law, and the impugned orders were passed in a haphazard manner.
- B. That the impugned Notification is illegal, void abinitio, with mala-fide intentions, without lawful authority, jurisdiction, and ineffective upon the rights of the appellant, hence liable to be cancelled.
- C. That the respondents while passing the impugned orders totally ignored the prescribed law and rules and passed the impugned orders which are liable to be set at naught.
- D. That no proper opportunity of hearing was provided to the appellant and passed the impugned orders which gross violation of the Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973, hence the impugned orders are not tenable in the eyes of law and are liable to be set aside.
- E. That punishments so awarded to the appellant are against the fundamental rights guaranteed by the constitution of Islamic Republic of Pakistan, 1973 and other laws for the time being enforced hence the both orders of the respondents may liable to be set aside.
- F. That the appellant has performed his duty with great zeal and devotion, hard work and till date no complaint of the appellant has registered to the respondents, in this regard guidance may be taken from the ACR's of the appellant.

5

G. That the other grounds will be raised, if any, at the time of arguments, with the permission of this Honorable Tribunal.

It is, therefore, prayed that on acceptance of this appeal the impugned Office Order No. 810/EC/CTD, dated 08.05.2024 & impugned Office Order No. 14351/EC, Dated: 05.08.2024 may please be set-aside/ Cancelled and the appellant may please be restored/ re instated in service with full back wages and benefits of service.

Appellant

Through

ABDUL SAMAD DURRANI

NASIR KHAN ABA KHEL
&

JOHAR SHAH MOHMAND
Advocates-High Court

Certificate:

As per the information of my client no such like service appeal in the subject matter has been filed before this Honorable Court.

ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. _____/2024

Said Wali, Constable Belt #. 1722 Kurram Region 2 CTD.

(Appellant)

VERSUS

Deputy Inspector General Of Police CTD, Khyber
Pakhtunkhwa & Another.

(Respondents)

AFFIDAVIT

I, Said Wali, Constable Belt #. 1722 Hangu Bypass CTD
Chowki, CTD Kurram Region 2, Son Of Said Muhammad
Resident of Mengal Abad Near Badsha Gul Kaly, Mandani,
Tehsil Tangi District Charsadda, do hereby solemnly affirm and
declare that the contents of the above appeal are true and correct
to the best of my knowledge and belief and that nothing has
been kept back or concealed from this Honorable Tribunal.



Said Wali
DEPONENT

CNIC # 21303-9009776-3

7

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. _____/2024

Said Wali, Constable Belt #. 1722 Kurram Region 2 CTD.
(Appellant)

VERSUS

DIG Of Police CTD, Khyber Pakhtunkhwa & Another.
(Respondents)

APPLICATION FOR CONDONATION OF DELAY

Respectfully Submitted:

1. That the appellant has filed the accompanied service appeal in which no date has been fixed so far.
2. That all the grounds raise in the main appeal may kindly be considered as part and parcel of the instant application.
3. That as mentioned in the main appeal that the appellant was got ill and diagnose with the Anxiety, Depression & Tension and after recovering little bit due to severe poverty the appellant once again diagnose with the Anxiety, Depression & Tension for the reason earlier no proper treatment instruction of the doctor was followed by the appellant and on the same the appellant was advised complete bed rest. It is pertinent to mention here that after feeling little bit well and improvement on 14.10.2024 the appellant approached to the Respondent No. 1 for taking the information in respect of the departmental appeal so filed by the appellant already mentioned above wherein the appellant was handed over with impugned order dated: 05.08.2024 vide which respondent No. 1 dismissed the departmental appeal of the appellant and maintain the order of the enquiry officer / Respondent No. 2 dated: 08.05.2024 hence the appellant got knowledge of the same.
4. That the delay in filling the instant appeal is not intentionally but due to the reason mentioned above and the same may kindly be condone in favor of the applicant/appellant.

5. That, valuable rights of the applicant/appellant are involved in the case hence the instant application may be allowed, in best interest of the justice.

It is, therefore, prayed that on acceptance of this application the delay caused in filling of appeal may kindly be condone in favor of the applicant/appellant.

Sidi
Applicant/ Appellant

Through

Sidi
ABDUL SAMAD DURRANI
NASIR KHAN ABA KHEL
&
JOHAR SHAH MOHMAND
Advocates High Court

AFFIDAVIT

I, Said Wali, Constable Belt #. 1722 Hangu Bypass CTD Chowki, CTD Kurram Region 2, Son Of Said Muhammad Resident of Mengal Abad Near Badsha Gul Kaly, Mandani, Tehsil Tangi District Charsadda, do hereby solemnly affirm and declare that the contents of the above appeal as well as the application are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.

Sidi
Deponent

CNIC # 21303-9009776-3



Annexure "A"

9



OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax: 0926-311354 • Email: policekurram@gmail.com

OFFICE ORDER.

Reference No. 18131/EC dated Kohat the 19.12.2022, direction of Regional Police Officer Kohat Region Kohat and recommendations of Regional Selection Board, Kohat, the following (10) successful candidates of district Kurram who have qualified ETEA Examination Test 2022 are hereby appointed as constables in BPS-07 for Counter Terrorism Department Kurram (CTD) against the existing vacancies with immediate effect, subject to the production of Medical fitness certificate and fulfillment of all coddle formalities. The cutoff date for calculating the upper age limit be the 31st day of the month of December preceding the year of advertisement i.e. 31.12.2021.

Rolls	Name	F/Name	CNIC NO.	Address	Quota
40100	Irfan Khan	Sher Khat Khan	21302-374352-3	District Kurram	Open
40105	Akhtar Muhammad	Muhammad Ghani	14301-7113933-3	District Kurram	Open
40135	Abdul Wali	Gul Rehman	21303-3929606-9	District Kurram	Open
40112	Aman Ullah Khan	Qadim Jan	21301-7806730-5	District Kurram	Open
40041	Muhammad Saqlan	Almasad Hussain	21303-0779200-3	District Kurram	Police son
40127	Said Wali	Said Muhammad	21303-9009770-3	District Kurram	Open
40116	Irfan Ullah	Walayat Khan	21301-1730122-3	District Kurram	Open
40073	Rehmat Wazir	Nazir Gul	21302-3631272-3	District Kurram	Open
40130	Hidal Hussain	Lal Hussain	21303-9703298-5	District Kurram	Police Son
40001	Maryam Bibi	Sher Zaman	21303-7632790-8	District Kurram	Open

The following (03) candidates who have qualified ETEA Examination Test 2022, but they were debarred by the Regional Selection Board, Kohat on ground mentioned against each.

Rolls	Name	F/Name	Address	Quota
40067	Shehzad Ali	Dost Ali	District Kurram	Absent
40140	Raza Ali	Nasir Ali	District Kurram	Absent/ biometric not verified
40122	Muhammad Wasim	Nasir Muhammad	District Kurram	Deficient in height not eligible

Attested

District Police Officer
Kurram

OB No. 431-33
Dated 21.12.2022

Copy forwarded for favor of information to the:

1. Worthy Inspector General of Police Khyber Pakhtunkhwa Peshawar.
2. Regional Police officer Kohat Region, Kohat.
3. All concerned

Principal Medical Officer
Category-B-Hospital
Jamalabad

Handwritten notes and signatures, including a signature that appears to be "B. S. ...".

Medical No. 2
GSPD, PK, 132978, S. 25, 000, Made in India, 1970
OUT-PATIENTS DEPARTMENT
NAME
YEARLY NO
DATE
No. 10/-
OUT-PATIENTS DEPARTMENT
NAME
YEARLY NO
DATE
No. 10/-
FACE VALUE RUPEES 10/-

DATE 20-8-24
YEARLY NO 545
NAME [Signature]
OUT-PATIENTS DEPARTMENT
No. 10/-

DATE
YEARLY NO
NAME
OUT-PATIENTS DEPARTMENT
No. 10/-

Attended

(10)

Annexure B

~~A Method~~

(1) (2) (3) (4) (5) (6) (7) (8) (9) (10) (11) (12) (13) (14) (15) (16) (17) (18) (19) (20) (21) (22) (23) (24) (25) (26) (27) (28) (29) (30) (31) (32) (33) (34) (35) (36) (37) (38) (39) (40) (41) (42) (43) (44) (45) (46) (47) (48) (49) (50) (51) (52) (53) (54) (55) (56) (57) (58) (59) (60) (61) (62) (63) (64) (65) (66) (67) (68) (69) (70) (71) (72) (73) (74) (75) (76) (77) (78) (79) (80) (81) (82) (83) (84) (85) (86) (87) (88) (89) (90) (91) (92) (93) (94) (95) (96) (97) (98) (99) (100)

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PAGE VALUE REP.

YEARLY NO

NAME

(11)

Department of Psychiatry

Qadri General Hospital
091-6551001
qadrihospital@gmail.com

Qadri General Hospital
Harchand Road, Daska
Teh. Tangi, Distt. Charsadda
091-6551001

[Handwritten signature]

~~Attended~~

Assistant Professor
M.D. Degree College
Tangi

complete rest
for one month

Dr. H. H. Khan
M.D. + D.C.I.S.D.

14y. Estar
2003
10/10/03

- Normal behavior
 - Normal speech
 - etc
 - Anger
 - Isolated
 - in daily activities
 - Loss of interest
 - Disturbed sleep
 - Low mood
- 2 months

25/12/2003

Said well

Qadri General Hospital
Harchand Road, Daska
Tangi, Distt. Charsadda



QADRI GENERAL HOSPITAL

(15)

MUKHALI UR REHMAN

- FRCGS (USA)
- American College of Gastroenterology
- European Association of Liver Diseases
- Asian Pacific Association of Liver Diseases
- Pakistani Society of Gastroenterology

MEDICAL SPECIALIST
HEPATOLOGIST
GASTROENTEROLOGIST

د. ایشانی

Consultant
 On Appointment
 PMDC NO: 6241-N

HI TECH DIAGNOSTIC CENTER
 OPP: Grid Station Host (on Road) (at) Dist Charsadda
 KPK Pakistan
 Postal Code 24543
 Ph: 0092-91-6555815
 Email: mukhalirahman@yahoo.com

قریب سے شہر ہسپتال (انڈیا) کے شہر ہے

صیغہ

NOT VALID IN COURT

Said a.o.

11/12
 11/12
 11/12
 11/12

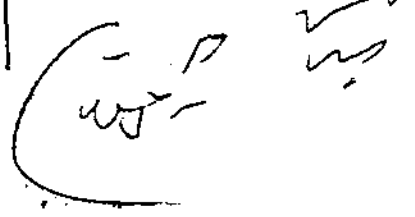
Attested




Amrohi 11/12
 11/12
 11/12
 11/12
 11/12
 11/12

Professor
 College

11/12
 11/12
 11/12
 11/12
 11/12
 11/12



کلینک: حسانی ٹیک ڈاٹ اینک سٹریٹ
 انتقال کروائیں: 091-6555815

پیشہ رو اور اتوار

پیشہ رو ہسپتال
 0304-6555815 - 091-6551001

ڈاکٹر ایم خلیل الرحمان
 سینئر ایجوکیشن
 گورنمنٹ ہسپتال (پشاور ہسپتال)

www.hospital.com
10015-22-169

In doubtful cases, free re-portion if altered

Technology

Professor
College
Signature

No MP Seen in thick & thin smears. Post. 159 - 100

Result

MP Test

Altered

REPORT

Age 2 Years Sex M
Said that he passed blood for MP Test
Hospital Opd

cedar
Hospital



17

In doubtful cases, specimens should be offered.

In doubtful cases, specimens should be offered.

Technology

Medical Professor
Green College

0.1
1.1
1.6
20.13
80.75

00
05
00
15
80

17000
S.1
Male 11-18
17000

NORMAL RANGE

FAH

Hemoglobin

Hospital Code

Said Hall
Hospital

Lab No

Lab No 1601

Handwritten notes in Urdu script



Handwritten text

Handwritten text

(18)

M. M. KHALIL UR REHMAN

Member of American College of Gastroenterology
Member of European Association of Liver Diseases
Member of Asian Pacific Association of Liver Diseases
Member of Pakistan Society of Gastroenterology

MEDICAL SPECIALIST
GASTROENTEROLOGIST

تواشانی
Consultation
On Appointment
PMDC NO: 6241-N

HITACHI DIAGNOSTIC CENTER
OFF: Ginn Sahn
Distt Charvadda
KPK Pakistan
Postal Code 24540
Ph: 0092-91-655515
Email: m.khalilurrahman@yahoo.com

ترتیب اور جب مشورہ دیا گیا ہے تو اس کے مطابق

NOT VALID IN COURT

Said aron

Handwritten notes and signatures in Urdu, including a signature that appears to be 'Aron'.

Attested

Handwritten notes in Urdu, possibly 'Aron'.

Handwritten list of names and medical notes in Urdu, including 'Aron' and 'Rahman'.

Handwritten notes in Urdu, possibly 'Aron'.

Handwritten signature and a stamp that reads 'Consultant or Specialist Doctor'.

Handwritten notes in Urdu, possibly 'Aron'.

کھونگ، جانی ٹیک ڈائیکان سٹریٹ
بالتال کراچی
فون: 0303-2555508 091-6555815

پیشن پروڈا توارد

قادر جنرل ہسپتال
0304-6555815 - 091-6551001

ڈاکٹر ایم خلیل الرحمان
مینیجنگ ڈائریکٹر
ہسپتال
بالتال کراچی

FINAL SHOW CAUSE NOTICE

NAZIR KHAN, SUPERINTENDENT OF POLICE, KURRAM REGION

Reference is made to the order of the Director of Police, Kurram Region, dated 13.07.2024, whereby you were recommended for punishment for the offence of...

The Director of Police, Kurram Region, has recommended you for punishment for the offence of... The Director of Police, Kurram Region, has recommended you for punishment for the offence of...

As per the report No. 23 dated 14.07.2023 of PS CTD Kohat, you were absent for 12 days long absence you have arrived on 24.02.2024 vide DD No. 04 dated 24.02.2024 of PS CTD Kurram (copies enclosed).

Due to your long absence Superintendent of Police, CTD Kohat Region has issued Show Cause Notice to you vide his office No. 1906/CTD, dated 01.11.2023 and delivered to this office vide Memo No. 122/CTD dated 23.01.2024 without serving upon you which was served upon you on 22.02.2024 with the direction to submit your reply without further delay.

After receipt of Show Cause Notice, you have submitted your written reply which was perused by the undersigned and found not satisfactory therefore, recommended to be charge sheeted. Your long absence shows your disinterest, negligence and amount to gross misconduct which cannot be ignored.

As a result thereof, I, as competent authority, have tentatively decided to impose upon you a major penalty provided under the rules, vide... You are, therefore, required to show cause as to why the above should not be imposed upon you also intimate whether you desire to be heard in person.

If no reply to this notice is received within 07 days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put forward in that case as no action shall be taken against you and in that case as no action shall be taken against you and in that case as no action shall be taken against you.

The copy of the finding of inquiry officer is enclosed. Copy of above is submitted for favour of information to the Addl. Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar. Alleged Recruit Constable Said Wali No. 1722. All concerned.

1/A-CTD, District Kurram the 22/04/2024. Copy of above is submitted for favour of information to the SUPERINTENDENT OF POLICE, CTD, KURRAM REGION.

SUPERINTENDENT OF POLICE, CTD, KURRAM REGION. SUPERINTENDENT OF POLICE, CTD, KURRAM REGION.

Handwritten text at the top of the page, possibly a title or header, including the word "Thefted" written upside down.

Main body of handwritten text in a cursive script, likely a historical document or record.



نمبر 1702

1702

موضوع: ذیلی پرفیٹنٹ آف پولیس CTD اور کڑی۔

بموضوع: پرفیٹنٹ آف پولیس CTD کریم ریجن۔

موضوع: حکامانہ انگریزی بہ خلاف کانسٹیبل سید ولی نمبر 1722 (CTD) ہینڈ کورڈ کریم ریجن۔

Attested

الزام کی تفصیل:

بموضوع: پابج شیٹ دستاویز آف ایلی گیٹس نمبر 485/EC/CTD مورخہ 12.03.2024 جاریہ دستاویز SP کی جانب سے
ریجن کانسٹیبل سید ولی نمبر 1722 پر ذیلی غیر معاشری کے اعلانات مانگے گئے ہیں۔

بموضوع: نمبر 23 مورخہ 14.09.2023 تمام سی ای ڈی کوہاٹ میں AOS اور 12 دن غیر معاشریہ ہوا تھا اور
24.02.2024 کو بموضوع 04 معاشریہ آیا تھا۔ جسکی بنا پر SP سی ای ڈی کوہاٹ نے انکو ایک ہندو شوکارڈ نمبر
(CTD/1906) پیش کیا۔ جسکا جواب قلمی پیش نہ ہونے کی وجہ سے کانسٹیبل سید ولی کو پابج شیٹ بمع شیٹ آف ایلی گیٹس
پیش کیا گیا اور ڈیڑھ ستمبر 2024 کو انکو انگریزی آفیسر مقرر کیا گیا۔

کارروائی انگریزی:

- انگریزی ہائیڈرو کاروائی کا آغاز کرتے ہوئے مورخہ 15.03.2024 کو زیر دستخطی نے کانسٹیبل سید ولی نمبر 1722 کو
تعمیراتی بیان پیش کیا۔ (انگریزوں) جمع کرنے کے لئے ایک پروان جاری کیا گیا۔
- اس طرح ایک پروان تمام ریڈر SP سی ای ڈی کریم ریجن بھی جاری کیا گیا تاکہ وہ کانسٹیبل سید ولی کی غیر معاشریہ اور معاشریہ کی
رہائی کے متعلق ذیلی دفتر میں جمع کرائے۔

• کانسٹیبل سید ولی نے اپنا تعمیری بیان پیش کیا۔ جس کا خلاصہ کیا گیا۔

• کانسٹیبل سید ولی کو نمٹنٹ کر اس سہولت پیش ہونے کے لئے مورخہ 21.03.2024 کو ایک پروان جاری کیا گیا۔

• کانسٹیبل سید ولی نے معاشریہ کر جس کے بیان پر اس سہولت کے لئے اور ان کے جوابات پر اسکے دستخط بھی لئے گئے۔

• مورخہ 21.03.2024 کو اس سہولت پر بات معلوم ہوئی کہ کانسٹیبل سید ولی کو اپنی غیر معاشریہ کے بارے میں ذیل (CTD/EC) نے انکو

معلوم کیا تھا۔

• اس طرح پر بھی معلوم ہوا کہ جو سید ولی کا تذات سید ولی نے پیش کیے ہیں وہ پورے دستاویز کے ساتھ ہیں اور ان کو سہولت

دیا جائے گا۔

• اس سہولت پر بھی معلوم ہوا کہ جو سید ولی کا تذات سید ولی نے پیش کیے ہیں وہ پورے دستاویز کے ساتھ ہیں اور ان کو سہولت

دیا جائے گا۔

Prof. Dr. M. A. Khan
Government College
Faisalabad



Annexure "P"
94

OFFICE OF THE,
SUPERINTENDENT OF POLICE,
COUNTER TERRORISM DEPARTMENT,
KURRAM REGION.

O.R.D.E.R

This order of mine will dispose off the departmental enquiry initiated against Recruit Constable Said Wali No. 1722 on the basis of allegations that as per DD Report No. 23 dated 14.09.2023 of PS CTD Kohat, he was absented himself without prior permission or leave from seniors. After 05 Months & 12 Days long absence he arrived on 24.02.2024 vide DD No. 04 dated 24.02.2024 of PS CTD Kurram. His long absence shows disinterest, negligence and amount to gross misconduct which cannot be ignored. Therefore, Superintendent of Police, CTD Kohat Region has issued Show Cause Notice to him vide No. 1906/CTD, dated 01.11.2023 and delivered to the office of Superintendent of Police, CTD Kurram Region vide Memo. No. 122/CTD dated 23.01.2024 without serving upon him which was served upon him on 22.20.2023 with the directions to submit his reply without further delay. After receipt of Show Cause Notice, he submitted his written reply which was perused by the undersigned and found not satisfactory thus recommended to be charge sheeted.

Therefore, he was served with Charge Sheet together with Statement of Allegations under Police Disciplinary Rules 1975 vide No. 485/EC/CTD, dated 12.03.2024 was issued to him by appointing DSP CTD Orakzai as Enquiry Officer. As such, the same was served upon him and the Enquiry Officer has completed the departmental enquiry accordingly. During the course of enquiry he was found guilty and enquiry officer suggested that he may be awarded major punishment as per Police Rules in his finding report received vide letter No. 07/R/CTD/Okz:, dated 19.04.2024.

On the perusal of Finding Report of the Enquiry Officer, the defaulter Constable was served with Final Show Cause Notice vide No.

(25)

(2)


004/DA CTD; dated 22.04.2024. As such, he submitted his reply to the response of Final Show Cause Notice which was perused by the undersigned and unsatisfactory. Thereafter, he was called in Orderly Room and heard in person but failed to define his long absence or produce any cogent/solid evidence.

Keeping in view of the above facts and having gone through available record, the undersigned has arrived at the conclusion that defaulter Recruit Constable Said Wali No. 1722 did not produced any cogent evidence or define his long absence therefore, I, Nazir Khan, Superintendent of Police, CTD Kurram Region in exercise of the powers conferred upon me, disposed of the enquiry in hand with orders that he is hereby removed from service under the Standing Order 03/2023 (Level-5) from the date of absence i.e 14.09.2023 with immediate effect.

Order Announced.

OIB No 20

Dated 09/05/2024.


SUPERINTENDENT OF POLICE,
CTD, KURRAM REGION


OFFICE OF THE, SUPERINTENDENT OF POLICE, CTD, KURRAM REGION.

No 810 /EC/CTD.


Dated Kurram the 08/05/2024

Copy of above is submitted for favour of information to the:-

1. Addl. Inspector General of Police, CTD, Khyber Pakhtunkhwa, Peshawar.
 2. Deputy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
 3. Superintendent of Police, CTD Kohat Region w/r to his office letter No. 122/CTD, dated 23.01.2024.
 4. Accountant, EC, SRC, OASI, Reader etc for necessary action.
 5. Ex-Recruit Constable Said Wali No. 1722.
- All concerned.


Assistant Professor
Government College
19203

Attested



SUPERINTENDENT OF POLICE,
CTD, KURRAM REGION

Attested

International Professor

Call: 0316-0089276
0302-9794594

21303-9009776-3

24/05/24

انٹرنیشنل پروفیسر کے نام سے ایک ای میل کے ذریعے ایک درخواست آئی ہے۔

انٹرنیشنل پروفیسر کے نام سے ایک ای میل کے ذریعے ایک درخواست آئی ہے۔

انٹرنیشنل پروفیسر کے نام سے ایک ای میل کے ذریعے ایک درخواست آئی ہے۔

انٹرنیشنل پروفیسر کے نام سے ایک ای میل کے ذریعے ایک درخواست آئی ہے۔

انٹرنیشنل پروفیسر کے نام سے ایک ای میل کے ذریعے ایک درخواست آئی ہے۔



Office of the
Deputy Inspector General of Police,
CTF&RI Counter Terrorism Department,
Khyber Pakhtunkhwa, Peshawar.
☎ 091-92124751 ☎ 091-92122501

27

24357 JBC
05-07-2024

Annexure 'H'

Mr. Said Wali,
Ex-Recruit Constable
Son of Said Mohammad,
R/O Village Mirmy Pesar Tangi,
District Upper Kurram.

Subject: DEPARTMENTAL APPEAL IN RESPECT OF EX-RECRUIT/CONSTABLE SAID WALI OF CTD KURRAM.

Memor:

On 30.07.2024 you were called in OR and heard in person in connection with your departmental appeal for reinstatement in service received vide this office duty No. 5222, dated 27.05.2024. From perusal of the case file, it was transpired that you have absented yourself from duty for a period of 05 months & 12-days without leave/permission of the competent authority. Proper departmental proceedings were initiated against you but during the course of enquiry, you also failed to produced cogent reason in support of your willful absence. As a result, you were removed from service.

You filed departmental appeal against the order of SP/CTD Kurram. You were called in connection with your appeal to produce any defence in support of your prolonged absence. You stated that during the absence period, you were ill and produced medical certificates but from perusal of case file, it has been found that you had failed to adopt proper procedure for obtaining medical rest.

During your short span of service i.e. 01 year and 05 months, you have absented yourself for such a long period (05 months & 12 days). Besides this, you were also returned from PTC Hangu as unqualified.

In view of the above facts, your appeal for re-instatement in service is filed/rejected.

[Handwritten signature]
DEPUTY INSPECTOR GENERAL OF POLICE
CTF&RI

[Handwritten signature]
(MUHAMMAD HASAN RAZA KHAN)^{ISP}
Deputy Inspector General of Police,
Counter Terror Financing & Extortion Unit,
CTD, Khyber Pakhtunkhwa,
Peshawar.

Copy of the above is forwarded for information & necessary action if any:-

1. District Police Officer, Kurram.
2. SP CTD District Kurram.

Attested
[Handwritten signature]

0302-9794544
0302-9794544

Attested
Call 2316-0089276

21303-9009756
21303-9009756

08
2023

Handwritten notes in Urdu script, including dates like 14/09/2023 and 14/09/2022, and various lines of text.

Vertical handwritten text on the left margin.

Handwritten signature or scribble, possibly containing the word "Munir" or similar.

Front of a Pakistani National Identity Card (NIC) with Urdu text and a QR code.

PAKISTAN National Identity Card

1303-900776-3

QR Code

Handwritten Urdu text: محمد علی محمد

Back of a Pakistani National Identity Card (NIC) with English text and a photo.

PAKISTAN National Identity Card

Holder's Name: Said Muhammad

Gender: M

Country of Issue: Pakistan

Identifying Number: 1303-900776-3

Date of Birth: 29.12.1996

Date of Issue: 23.08.2024

Signature: Said Muhammad

Photo

Handwritten number 156 inside a circle.

