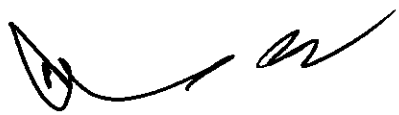


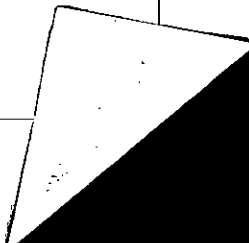
**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

Service Appeal No. 1095/2024

M. Akhtar                      versus                      Government of Khyber Pakhtunkhwa

S.No. of Order & Date of proceeding	<b>Order or other proceedings with signature of Chairman/Member(s)/Registrar and that of parties or counsel where necessary</b>
Order-10 30 <sup>th</sup> October, 2024.	<p>Present:</p> <ol style="list-style-type: none"><li>1. None for the appellant.</li><li>2. Mr. Umair Azam, Additional Advocate General for the respondents.</li></ol> <p><b><u>Mr. Kalim Arshad Khan, Chairman:</u></b> Nobody is present on behalf of the appellant nor security fees has been deposited, therefore, the instant appeal is dismissed in default as well as for non-compliance of the court order. Consign</p> <p>2.     <i>Pronounced in open court at camp court Abbottabad and given under my hand and seal of the Tribunal on this 30<sup>th</sup> day of October, 2024.</i></p> <p style="text-align: right;"> (Kalim Arshad Khan) Chairman Camp Court Abbottabad</p> <p><i>*Adnan Shah*</i></p>

SCANNED  
KPST  
Peshawar



12<sup>th</sup> August, 2024

Appellant in person present and seeks adjournment on the ground that his counsel is busy in Peshawar High Court. Adjourned. To come up for preliminary hearing on 17.09.2024 before the S.B. Parcha Peshi given to the appellant.

SCANNED  
KPST  
Peshawar

\*Naeem Amin\*

(Aurangzeb Khattak)  
Member (Judicial)

17/9/24

Due to public holiday the case is adjourned to 18/10/24. Reader.

- 18.10.2024
1. Appellant present in person. Preliminary arguments heard.
  2. Points raised needs consideration. Instant appeal is admitted for regular hearing subject to all just and legal objections. The appellant is directed to deposit security fee within ten days. Thereafter, notices be issued to respondents for submission of written reply/comments. Respondents be summoned through TCS the expenses of which be deposited by the appellant within seven days. Appellant submitted an application for transfer of appeal to camp court, Abbottabad, which application is allowed. To come up for written reply/comments on 30.10.2024 before S.B at Camp Court, Abbottabad. P.P given to the appellant.

TCS + Security  
not submitted  
25-10-24

SCANNED  
KPST  
Peshawar

Rashida Bano  
Member (J)

15.07.2024 1. Appellant present in person.

2. Perusal of record reveals that appeal in hand was returned to the appellant on 05.10.2023 for removing office objections with direction to resubmit the same within 15 days. The record reveals that the same was resubmitted on 20.11.2023 with a delay of 32 days. Learned counsel for the appellant stated at the bar that he resubmitted it within time i.e on 20.10.2023 but the same was again returned two times by the office. He in this respect referred to entry of resubmission, which is available on file which bears date of resubmission with his resubmission note as 20.10.2023. Perusal of the court file also reveals that there is over writing upon month, which was made 11 instead of 10 by marking 0 as 1.

3. Appellant also stated that when he brought file for resubmission, the same was twice returned to him by the office, without writing any return order. This fact was confirmed by office of this Tribunal, which support the appellant contention. Therefore, in the peculiar circumstance of the case, office objection is removed and instant appeal be fixed for preliminary hearing on 12.08.2024 before S.B. P.P given to the appellant.




(Rashida Bano)  
Member (J)

23.07.2024

Learned counsel for the appellant present and requested for adjournment in order to prepare the brief. Granted. To come up for arguments on 25/07/2024 before S.B at Camp Court, Abbottabad.. P.P given to the learned counsel for the appellant.


\*Kaleemullah\*

  
(Rashida Bano)  
Member (J)  
Camp Court, Abbottabad

25.07.2024

Appellant in person present and requested for adjournment on the ground that learned counsel for the appellant is not available today. To come up for arguments on 29.07.2024 before S.B at Principal Seat, Peshawar. P.P given to the appellant.

\*Kaleemullah\*


  
(Rashida Bano)  
Member (J)  
Camp Court, Abbottabad

24.01.2024

Learned counsel for the appellant present and requested for adjournment in order to further prepare the brief. Adjourned. To come up for arguments on office objection on 26.03.2024 before S.B at camp court, Abbottabad. P.P given to learned counsel for the appellant.

SCANNED  
KFST  
Peshawar

\*KaleemUllah\*

  
(Rashida Bano)  
Member (J)  
Camp Court, Abbottabad

Due to cancellation of tour case is  
adjourn to 30/5/2024.

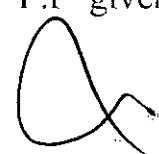


30<sup>th</sup> May. 2024

1. Appellant in person present.
2. He made a request for adjournment as his counsel was not available today. Adjourned. To come up for arguments on office objection on 23.07.2024 before S.B. P.P given to the appellant.

SCANNED  
KFST  
Peshawar

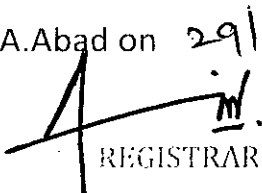

\*Mutazem Shah\*

  
(Kalim Arshad Khan)  
Chairman

Form-A  
FORM OF ORDERSHEET

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

Case No. \_\_\_\_\_ /2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	23.11.2023	<p>As per direction of the Worthy Chairman the present appeal is fixed for decision on office objections before touring Single Bench at A.Abad on 29/11/23</p> <p> REGISTRAR</p>
	29 <sup>th</sup> Nov. 2023	<p>1. Nobody is present on behalf of the appellant.</p> <p>2. Notice be issued to appellant as well as his counsel for arguments on office objections, for 24.01.2024 before S.B at Camp Court, Abbottabad.</p> <p> (Kalim Arshad Khan) Chairman Camp Court, Abbottabad</p>

SCANNED  
KPST  
Peshawar

SCANNED  
KPST  
Peshawar

\*Mutazem Shah\*

Respected Sir,

It is submitted that the present appeal was received on 05.10.2023 after thoroughly scrutinizing the same, many deficiencies were found in it which was returned to the counsel for the appellant for completion and resubmission within 15 days which was to be resubmitted on 20-10-2023 but counsel for the appellant re-filed the same today on 21.11.2023 late by 32 days.

The appeal is submitted to your Honour under rule-7(c) of Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

Worthy Chairman

*90 be tried*  
*23/11/23*  
REGISTRAR *23/11/23*

The appeal of Mr. Muhammad Akbar son of Ali Asghar, Flat No. 33 Paris camp Balakot Mianehra received today i.e. on 05.10.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Memorandum of appeal is misprinted.
2. Index of the appeal is incomplete be completed according to the rules.
3. Appeal has not been flagged/arked with annexures marks.
4. Law under which appeal is filed is not mentioned.
5. Page nos. 9, 17, 22 and 23 of the appeal are illegible which may be replaced by legible/better one.
6. Annexures of the appeal are unattached.
7. Annexures of the appeal are not in sequence be annexed serial wise as mentioned in the memo of appeal.
8. Three more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3353 /S.T.

0105/19 /2023

REGISTRAR  
 SERVICE TRIBUNAL  
 KHAYBER PAKHTUNKHWA  
 PESHAWAR  
 5/10/23

Mr. Zulfiqar Ahmad Adv.  
 High Court A Abad.

SIR  
 Copy/sets has been  
 prepared and submitted  
 for further copy process  
 for the court file  
 20/10/23



10

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PUKHTUNKHWA PESHAWAR**

*Appeal no. 1095/2024*

Mohammad Akhtar S/O Ali Asghar IHC Paltoon #39 paras camp Teshsil Balakot  
District Mansehra.

... APPELLANT

VERSUS

1. Government of KPK through Secretary home and TAs Department Peshawar
2. Inspector General of Police KPK Peshawar.
3. SP Admin and minority SSU (CPEC) KPK Peshawar.
4. Commandant SSU (CPEC) Peshawar
5. Muhammad Saeed DSP SSU (CPEC) Hazara Region.

**RECORDED**  
**KPST**  
**Peshawar**

...RESPONDENTS

=====

**SERVICE APPEAL**

**INDEX**

S. No.	Description	Annexure	Pages.
1	Memo of Appeal along with affidavit		1- 8
2	Application for condonation of delay along with affidavit		8
3	Copy of application for long leave having alleged removing the report of senior office.	A	9
4	Copy of daily diary serial # 11 dated 30/3/22	B	10
5	Copy of entry in the police post dated 31/5/22	C	11
6	Copy of show cause notice/and reply	D& E	12-13
7	Copy of order of inquiry and charge sheet/ statement of allegation / and Reply.	F. G.	14-15 16
8	Copy of final show cause notice and medical prescriptions/reply	H,I, J.	17-18—22 23-24
9	Copy of impugned order	K	25-26
10	Copy of departmental appeal	L	27-28
11	Copy of appeal made to respondent #2 & order for treating appeal as revision	M	29-30
12	Copy of impugned order	N	31-32
13	Wakalatnama		

*M. Akhtar*

...APPELLANT

*Ms- 0322 2854976*  
Through

Dated: 5/09/2023

*Zulfiqar Ahmad*  
(ZULFIQAR AHMAD)  
Advocate High Court  
Abhattabad

*LEKLI. 0333. 5084670*

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PUKHTUNKHWA PESHAWAR**

Service Appeal No. 1095 /2024

Mohammad Akhtar S/O Ali Asghar IHC Paltoon #39 paras  
camp Teshsil Balakot District Mansehra.

**... APPELLANT**

**VERSUS**

1. Government of KPK through Secretary home and TAs Department Peshawar
2. Inspector General of Police KPK Peshawar.
3. SP Admin and minority SSU (CPEC) KPK Peshawar.
4. Commandant SSU (CPEC) Peshawar
5. Muhammad Saeed DSP SSU (CPEC) Hazara Region.

8144  
05/10/23

**...RESPONDENTS**

=====

**APPEAL AGAINST THE ORDER OF RESPONDENT #3 PASSED VIDE OB # 546 DATED 23-08-2022 WHEREBY THE ALLEGED ABSENCE PERIOD OF 83 DAYS WAS TREATED AS LEAVE WITHOUT PAY ALONG WITH STORAGE OF ONE ANNUAL INCREMENT WITH CUMALATIVE AFFECT AS WELL AS AGAINST THE ORDER OF RESPONDENT #2 PASSED VICE LETTER #1621 dated 16-06-2023 COMMUNICATED ON 2-8-2023 WHEREBY THE REVISION PETITION WAS FILED THAT IS ILLEGAL, DISCRIMINATORY AGAINST THE SETTLED NORMS OF JUSTICE AND IS RESULTED IN MISCARRIAGE OF JUSTICE THEREFORE IS LIABLE TO BE SET ASIDE.**

Filed to-day  
Registered

-----

**PRAYER:- ON ACCEPTANCE OF INSTANT APPEAL THE ORDERS OF RESPONDENTS NO 2 AND 3 MAY KINDLY BE SET ASIDE AND THE PENALTY IMPOSED UPON THE APPELLANT MAY ALSO BE SET ASIDE AND ANY FURTHER PROCEEDINGS IN CONSEQUENCE OF IMPUGNED ORDERS MAY ALSO BE SET ASIDE BEING UNLAWFUL AND AGAINST THE SETTLED NORMS OF JUSTICE AND THE ALLEGED ACCEPTANCE PERIOD MAY VERY KINDLY BE TREATED LEAVE WITH PAY.**

-----

C

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PUKHTUNKHWA PESHAWAR**

Service Appeal No. 1095 /2024

Mohammad Akhtar S/O Ali Asghar IHC Paltoon #39 paras camp  
Teshsil Balakot District Mansehra.

... APPELLANT

VERSUS

1. Government of KPK through Secretary home and TAs  
Department Peshawar
2. Inspector General of Police KPK Peshawar.
3. SP Admin and minority SSU (CPEC) KPK Peshawar.
4. Commandant SSU (CPEC) Peshawar
5. Muhammad Saeed DSP SSU (CPEC) Hazara Region.

...RESPONDENTS

=====

**APPEAL UNDER SECTION 4 OF K.P SERVICE TRIBUNAL  
ACT 1974 AGAINST THE ORDER OF RESPONDENT #3  
PASSED VIDE OB # 546 DATED 23-08-2022 WHEREBY THE  
ALLEGED ABSENCE PERIOD OF 83 DAYS WAS  
TREATED AS LEAVE WITHOUT PAY ALONG WITH  
STOPPAGE OF ONE ANNUAL INCREMENT WITH  
CUMALATIVE AFFECT AS WELL AS AGAINST THE  
ORDER OF RESPONDENT #2 PASSED VICE LETTER  
#1621 dated 16-06-2023 COMMUNICATED ON 2-8-2023  
WHEREBY THE REVISION PETITION WAS FILED THAT  
IS ILLEGAL, DISCRIMINATORY AGAINST THE SETTLED  
NORMS OF JUSTICE AND IS RESULTED IN  
MISCARRIAGE OF JUSTICE THEREFORE IS LIABLE TO  
BE SET ASIDE.**

-----

**PRAYER:- ON ACCEPTANCE OF INSTANT APPEAL THE  
ORDERS OF RESPONDENTS NO 2 AND 3 MAY KINDLY  
BE SET ASIDE AND THE PENALTY IMPOSED UPON  
THE APPELLANT MAY ALSO BE SET ASIDE AND ANY  
FURTHER PROCEEDINGS IN CONSEQUENCE OF  
IMPUGNED ORDERS MAY ALSO BE SET ASIDE BEING  
UNLAWFUL AND AGAINST THE SETTLED NORMS OF  
JUSTICE AND THE ALLEGED ACCEPTANCE PERIOD  
MAY VERY KINDLY BE TREATED LEAVE WITH PAY.**

-----

Respectfully Sheweth; -

The facts giving rise to the instant appeal are arrayed as under.

**FACTS:-**

1. That the appellant being police employee serving as head constable was posted in SSU/ CEPEC platoon #39 police post shatyal District upper Kohistan and had moved an application for long leave on 28/3/2022 for getting the maintenance and repairing of his mud house. (Copy of application is attached as annexure "A").
2. That the platoon in charge and the DSP forwarded the application whereupon SP north Mansehra also recommended 45 days leave.
3. That the appellant on 30/3/2022 made his departure from the police post Peshawar and while making the photo state copy of the application due to falling of some ink on it, a portion of the application got invisible where the report of DSP was mentioned. Copy of daily diary serial # 11 dated 30/3/22 is attached as Annexure B while Annexure C is the entry in the police post dated 31/5/22 when the applicant return back from Peshawar.
4. That his matter of getting the application damaged, the OHC was informed and also the affect was brought into the

notice of SP by fixing the blank paper at the spoilt portion of the application. According to the report of SRC there was leaves account of 1142 at her credit of applicant but the applicant was made accused for cheating and intentionally damaging the portion of application where forwarding report of DSP was entered.

5. That for the allegation of removing and damaging the report of DSP/ Senior officer, a show cause notice was issued to applicant under the police rule 1975 on 8/4/2022 that was properly replied explaining each and every prospect of ink matter and the reply of itself contain the submission of applicant for filling the show cause notice treating the absence period as leave keeping in view sufficient leave account of applicant. **Copy of show cause notice and reply are attached as D and E.**
6. That thereafter the order for inquiry was made by respondent #3 appointing and nomination Inspector FAZAL E Mahmood khan as inquiry officer to inquire into chare label against applicant by issuing charge sheet and summary of allegation with the direction to submit reply with in the period of seven days. **Copy of order of inquiry and charge sheet/ statement of allegation is annexed as F and G.**
7. That the final show cause notice was given to the appellant that too was replied but even then impugned order was passed although sufficient explanation was tendered even in

4

*the matter of alleged absence and the medical prescriptions were presented which was also not honored. Copy of show cause notice and medical prescriptions are annexure H & I.*

8. *That thereafter the impugned order passed by respondent #3 was made in view of report submitted by one Muhammad Saeed DSP SSU (CPEC) who was never nominated as inquiry officer and the appellant was held responsible for absence from official duties holding 83 days absence period treating it leave without pay as well as for ink matter / removing the remarks of his seniors his one annual increment was stopped with cumulative affect vide OB # 546 dated 23/8/2022. Copy of impugned order is attached as Annexure J.*

9. *That a departmental appeal to respondent #4 was made against the impugned order. Copy of departmental appeal is attached as Annexure K.*

10. *That no reply or order was made by the respondent #4 on appeal lodged therefore through another appeal the jurisdiction of respondent #2 was invoked who treated the appeal as revision but did not consider the submissions made therein. Copy of dismissal by revision by respondent #2 was delivered to the applicant 2/8/2023. Copy of appeal*

(5)

*made to respondent #2 and order there on as attached as Annexure L and M.*

*Feeling aggrieved of the orders of respondent, the instant appeal is preferred inter-alia on the following grounds:-*

**GROUNDS:**

- a) *That the order of Respondents is against law facts and material on record.*
- b) *That no proper inquiry is been conducted against the applicant and punishment awarded was quite alien to the existing law and procedure as enumerated in police rule 1975.*
- c) *That the basic show cause notice to the appellant does not contain any allegation of absence from duties but the punishment awarded through the impugned order do contain the absence matter therefore the appellant has been condemned unheard which is not justified under the law and need to be reversed.*
- d) *That the appellant has sufficient leave account in his credit therefore the respondents was obliged to convert the alleged absence period if any into that of leaves available.*




- e) That the punishment is based on the report of One Muhammad Saeed Khan who was never appointed as inquiry officer.
  
- f) That no proper inquiry was conducted in the matter and the rights of cross examination was not provided to appellant if any witness was examined therefore the appellant was discriminated to this score as well that was not permitted under the law and need to be reversed.
  
- e) That further points will be submitted at the time of arguments.

**PRAYER:**

*It is therefore most humbly prayed that on acceptance of instant appeal impugned orders of respondent # 2 and 3 may kindly be set aside and the punishment awarded may very kindly be set aside in order to meet the end of justice.*

  
...APPELLANT

Dated 5/09/2023

Through  
  
(ZULFIQAR AHMAD)  
Advocate High Court  
Abbottabad

7

**BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA**  
**PESHAWAR**

*Mohammad Akhtar S/O Ali Asghar IHC Paltoon #39 paras camp  
Teshsil Balakot District Mansehra.*

**... APPELLANT**

**VERSUS**

1. Government of KPK through Secretary home and TAs  
Department Peshawar
2. Inspector General of Police KPK Peshawar.
3. SP Admin and minority SSU (CPEC) KPK Peshawar.
4. Commandant SSU (CPEC) Peshawar
5. Muhammad Saeed DSP SSU (CPEC) Hazara Region.

**...RESPONDENTS**


=====

**SERVICE APPEAL**

**AFFIDAVIT**

*I, Muhamad Akhtar S/O Ali asghar R/O IHC Paltoon #39 paras camp  
Teshsil Balakot District Mansehra. Do hereby solemnly affirm and  
declare on oath that the contents of foregoing appeal are true and  
correct to the best of my knowledge and belief and nothing has been  
concealed therein. No such appeal is pending in any other court.*

Dated 5/09/2023  
Identified by:

  
**(ZULFIQAR AHMAD)**  
Advocate High Court  
Abbottabad  
Cont. 0333-5054670-

  
**...DEPONENT**

MA. 03222805922

8

**BEFORE THE KPK SERVICES TRIBUNAL,**  
**CAMP COURT ABBOTTABAD**

Service Appeal No. \_\_\_\_\_ /2023

*Muhammad Akhtar*

**VERSUS**

*Government of KPK & Others*

---

**SERVICE APPEAL**

**PETITION FOR CONDONATION OF DELAY**

*Respectfully Sheweth; -*

- *That the titled appeal is pending hearing before this Honorable tribunal.*
- *That the delay if any was not intentional as the appeal has remained pending before the tribunal.*
- *That a huge loss to the appellant will be caused if the unintentional delay is not condoned as the impugned orders are against law and facts.*

**PRAYER**

*It is therefore most humbly prayed that on acceptance of instant petition delay may graciously be condoned in the best interest of justice.*

*[Signature]*  
...PETITIONER



Dated: 5/6/23 /2023

16/2023

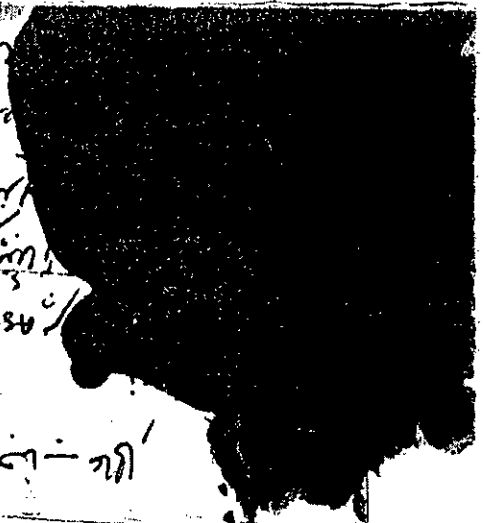
Through

*[Signature]*  
(ZULFIQAR AHMAD)  
Advocate High Court  
Abbottabad

Conc. - 0333-5054670

**INTERESTED**

SSU CPEC North  
Superintendent of Police



There are enough HCs in P.N.O.S  
The application is recommended.  
as of 1st Jan 2022.

(45) days E/T ✓

DSP/A

This Dates are as under:  
Date of Birth: 26-4-1994  
Total Service: 27 years 9 months  
E/T leave enjoyed 155 in 600  
Balance leave 1141 days  
New Applied for 90 days  
Submitted Please  
SACSSU (CPEC)  
HOR (PO)  
SACSSU (CPEC) February

28-03-2022  
SI/PC-SSU  
C/PC-11-K

IC P/Comp. Commander

Handwritten Urdu text, likely a letter or report, containing details of the application and service records.

APPLICATION FOR THE GRANT OF LEAVE SSU (CPEC)

117

ATTESTED

*[Handwritten signature]*

MM SSU - P.P. Shrestha - U.K.  
CPBE  
30-08-2022

*[Handwritten signature]*

CPBE

*[Handwritten notes in Nepali]*

*[Handwritten notes in Nepali]*

CPBE

*[Handwritten notes]*

30-08-22

10

CPBE

CPBE



12

10

**OFFICE OF THE COMMANDANT SSU (CPEC) KP - PESHAWAR**

No. 1916 /HQrs/SSU, dated Peshawar the, 08/04/2022.

**SHOW CAUSE NOTICE**

(Under Rule 5 (3) K.P.K Police Rules, 1975)

1. You Head Constable Muhammad Akhtar No. 108 while posted at SSU (CPEC). District Abbottabad have rendered yourself liable to be proceeded under rule 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct/s;

You Head Constable Muhammad Akhtar No. 108 while posted at SSU (CPEC) you were caught cheating with your E-leave application by removing the report of your seniors which shows gross miss-conduct on your part.

That by reason of above, as sufficient material is place before the undersigned, therefore, it is decided to proceed against you in general Police proceeding without aid of enquiry officer;

2. That the misconduct on your part is prejudicial to good order of discipline in the Police force;
3. That your retention in the Police force will amount to encourage in efficient and unbecoming of good Police officer;
4. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the rules.
5. You are, therefore, called upon to show cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred to above.
6. You should submit reply to this show cause notice within 07 days of the receipt of the notice failing which an ex parte action shall be taken against you.
7. You are further directed to inform the undersigned that you wish to be heard in person or not.
8. Grounds of action are also enclosed with this notice.

*08/04/22*  
**(ROZIA ALTAF)**  
SP Admin SSU (CPEC),  
Khyber Pakhtunkhwa Peshawar.

Received By \_\_\_\_\_

Dated    /    /2022.

*7/11/22*  
**ATTESTED**

*DSP*  
*دستور العمل کے مطابق*

مشکوٰۃ شوکار نوٹس مجاہدہ جناب SP صاحبہ عرفی خدمت جون م سائل سے بوجہ  
تھریلو امیر جینسی / عرفی کمان 3 ماہ رخصت طرآن لیلے درخواستیں کی۔  
جو افسران نے درخواست Forwoded کرتے ہوئے جناب SP صاحبہ سے  
45 یوم رخصت کا سفارش کی رہی۔

خونہ سائل خود افسران امیر جینسی جو ر پور سے 3 ماہ رخصت لیا جا تھا  
اس لیے اصل درخواست سائل سے پاس موجود تھی۔ مگر اچانک سیاہی پرنے  
کی وجہ سے درخواست کا ایک حصہ مکمل طور پر سیاہی آلود ہو کر خراب ہو گیا۔  
جو انتہائی بُرا لگے گا۔

اگرچہ سائل خراب شدہ درخواست افسران بالہ نوٹس رد کیا تو بھی لیٹینا افسران بالہ  
سائل کو رخصت تو دے دیتے۔ مگر سائل نے سیاہی آلود اور خراب شدہ درخواست  
افسران بالہ نوٹس پر نا مناسب نہیں کیا۔ اس لیے نیک بینی کے ساتھ  
سیاہی آلود حکم پر سفید کاغذ لگا دیا۔ تاہم درخواست پرنے لگے۔ اس میں

سائل کی کوئی بد نیتی شامل نہیں تھی۔ اور نہ ہی جان بوجھ کر ایسا کر سکتا ہوں۔  
استدعا دھیکہ مندرجہ بالہ حالات اور شبہوں کو مدنظر  
رکھتے ہوئے سائل کے خلاف جاری شوکار نوٹ داخل دفتر فرمایا جاوے اور عدالت  
عبر حاضر ہو کر رخصت میں شمول کیا جائے۔  
جناب امیر نوٹس ہوئی۔

الحارثی  
Asi  
ATTESTED  
خال امیر نوٹس  
بلالون نمبر 39  
7/11/2022



14

F

**CHARGE SHEET U/R 6(1) (A) NWFP (NOW KHYBER PAKHTUNKHWA)**  
**POLICE RULES 1975.**

You Head Constable Muhammad Akhtar No. 108 of SSU (CPEC), District Lower Chitral is hereby charged for committing the following Omission/Commissions.

That you Head Constable Muhammad Akhtar No. 108 of SSU (CPEC), District Abbottabad were caught cheating with your E-leave application by removing the report of your seniors, which is undisciplined and shows gross misconduct on your part.

You are hereby called upon to submit your written defense against the above charges mentioned before the enquiry officer.

Your reply should reach to the inquiry officer within (07) days from date of receipt of this charge Sheet, failing with Ex-parte proceeding shall be initiated against you.

**SUMMERY/STATEMENT OF ALLEGATION**

You Head Constable Muhammad Akhtar No. 108 of SSU (CPEC), District Abbottabad were caught cheating with your E-leave application by removing the report of your seniors, which is undisciplined and shows gross misconduct on your part. Your reply should reach to the inquiry officer within (07) days from date of receipt of this charge Sheet, failing which an Ex-parte proceeding shall be initiated against you.

*[Handwritten signature]*  
03/06/22

**(ROZIA ALTAF)**  
SP Admin SSU (CPEC),  
Khyber Pakhtunkhwa, Peshawar.

*[Handwritten signature]*  
**ATTESTED**

**ORDER OF INQUIRY AGAINST HEAD CONSTABLE MUHAMMAD AKHTAR NO. 108 CONTAINED UNDER SUB, RULE 4, OF RULE 5 OF NWFP (NOW KHYBER PAKHTUNKHWA) (E&D) RULES 1975.**

It has been made to appear before me that accused Head Constable Muhammad Akhtar No. 108 is prima-facie guilty of the following charges to be dealt with under General Police proceedings contained u/r 5(4) of NWFP Rules (E&D) 1975.

Head Constable Muhammad Akhtar No. 108 of SSU (CPEC), District Abbottabad was caught cheating with his E-leave application by removing the report of his seniors, which is undisciplined and shows gross misconduct on his part.

The act of accused official falls within the ambit of misconduct within the meaning of rules 2 (iii) rules 1975 and is liable to be proceeded with under the General police proceedings, contained in Police Rules 1975.

From the above charge, I am convinced that the said official has ceased to become efficient and it accused of gross misconduct therefore, I Superintendent of Police Special Security Unit (CPEC) HQrs. Peshawar being authorized officer within the meaning of 2(ii) of the said rules nominate Inquiry Officer. Inspector Fazle Mabood Khan to inquire into the charge, levelled against him.

The Inquiry officer after completing all inquiry proceedings, shall forward the verdict/Findings to the undersigned within due dated period of 10-days contained U/S 6 (5) of the rules.

Charge sheet and summary of allegations against the accused official, are being issued separately, reply where of shall be submitted before the enquiry officer within the period of (07 days) from date of receipt.

*[Handwritten signature]*  
03/06/22

**(ROZIA ALTA F)**  
SP Admin SSU (CPEC),  
Khyber Pakhtunkhwa, Peshawar.

No. 3008 OHC/SSU,

dated Peshawar the 03 / 06 / 2022.

Copy to the:-  
Enquiry Officer. Inspector Fazle Mabood Khan.

*[Handwritten signature]*  
**ATTESTED**

ATTESTED

M. M. M. M.

Handwritten signature and date: 108/3/1954

Main body of handwritten text in Urdu script, including the word 'Recommended'.

Handwritten text at the bottom left: 108/3/1954

Handwritten signature at the bottom center.

**FINAL SHOW CAUSE NOTICE**

17

H.


(Under Rule 5 (3) K.P.K Police Rules, 1975)

As Ordered, I Superintendent of Police Admin SSU (CPEC), Peshawar, as Competent Authority hereby serve upon you IHC Muhammad Akhtar No. 108 of SSU (CPEC), District Abbottabad.


You IHC Muhammad Akhtar No. 108 were caught cheating with your E-leave application by removing the report of your seniors. Upon which you were issued charge sheet but your reply was not satisfactory. Also you have remained absent from your lawful duty w.e.f. 30.03.2022 up to 31.05.2022 (62 days) without any leave or permission of the competent authority, received vide DD report No. 08, dated 31.05.2022.

Therefore I, Superintendent of Police Admin SSU (CPEC), Peshawar, as Competent Authority have tentatively decided to impose upon you major/minor penalty including dismissal from the service under police rules.

- 1) You are therefore, required to show cause & explain your position as to why penalty should not be imposed upon you.
- 2) If no reply to Show Cause Notice is received within the (07) seven days of its receipt, it shall be presumed that you have no defense to put in and consequently ex-parte action shall be taken against you.

  
(FAZAL HANIF)

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

  
20/06/2022

No. 3759 OASI/SSU

dated Peshawar the 21/06/2022.

  
**ATTESTED**

18

I

2

Counter Record of OPD Slip BBS Teaching Hospital Abbottabad

OPD No: \_\_\_\_\_

Serial No. \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

BENAZIR BHUTTO SHAHEED TEACHING HOSPITAL ABBOTTABAD

OPD No. 32821 GENERAL OPD

Serial No. \_\_\_\_\_

Name: \_\_\_\_\_

Date: 30/7

Age: \_\_\_\_\_

Sex: \_\_\_\_\_

Address: \_\_\_\_\_

CNIC: \_\_\_\_\_

Mobile: \_\_\_\_\_

Temp: \_\_\_\_\_

BP: \_\_\_\_\_

ECG:  Yes  No

IV Line:  Yes  No

any:  Yes  No

Any Procedure:  Yes  No

Examination/  Yes  No

Advise: \_\_\_\_\_

Known Case of COVID

D

Tab Diclofenac SR

Tab Paracetamol

Tab Metformin

Tab Osteo forte

Advise Bed rest for

Four weeks

MEDICAL OFFICER

DNQ HOSPITAL

ABBOTTABAD

**ATTESTED**

Name of Doctor: \_\_\_\_\_

Signature: \_\_\_\_\_

*[Handwritten Signature]*



RECEIVED  
GENERAL INVESTIGATIVE  
DIVISION  
FEDERAL BUREAU OF  
INVESTIGATION  
U. S. DEPARTMENT OF JUSTICE

Thom

Answer for  
Peak (10) weeks

2

Peak (1) weeks  
(4) Peak top

26

Counter Record of OPD Slip BBS Teaching Hospital Abbottabad

OPD No: \_\_\_\_\_

Serial No. \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

BENAZIR BHUTTO SHAHEED TEACHING HOSPITAL ABBOTTABAD

OPD No: 46830 GENERAL OPD

Serial No. \_\_\_\_\_

Name: \_\_\_\_\_

Date: 27/5

Age: \_\_\_\_\_

Sex: \_\_\_\_\_

Address: \_\_\_\_\_

CNIC: \_\_\_\_\_

Mobile: \_\_\_\_\_

Temp: \_\_\_\_\_

BP: \_\_\_\_\_

ECG:  Yes  No

IV Line:  Yes  No

ASD/ Any Procedure:  Yes  No

Examination/ Advise:  Yes  No

46830

H/o low backache  
of 10 months

Ad  
X-ray lumbar spine  
MRI

Inf. Treatment  
3 Meloxicam  
MS

Ad  
physiotherapy  
SWS

BBS TEACHING HOSPITAL  
ABBOTTABAD  
Tal Spineflex  
1000

Name of Doctor: \_\_\_\_\_

Signature: \_\_\_\_\_

ATTESTED

Q

7AM

D.T.





**ATTESTED**

ABBOTTABAD  
DHO HOSPITAL

MEDICAL OFFICER D.V.

Work done for this

25. Oct 1972

24. November 1972

SES TEACHING HOSPITAL  
ABBOTTABAD

27. Dec 1972

1. March 1973

by D. Khan  
↓  
↓  
↓

Lower case of 1972

Signature: \_\_\_\_\_

Name of Doctor: \_\_\_\_\_

*[Handwritten signature]*

*[Handwritten notes]*

Examination:  Yes  No

Any Procedure:  Yes  No

ASD:  Yes  No

AD:  Yes  No

ECG:  Yes  No

1/6  
96572

30/6/22

*[Handwritten initials]*

ALB. 90572  
Date - 30/06/72

Counter Record of OPD Slip BBS Teaching Hospital Abbottabad

OPD No: \_\_\_\_\_ Serial No: \_\_\_\_\_

Name: \_\_\_\_\_ Date: \_\_\_\_\_

BENAZIR BHUTTO SHAHEED TEACHING HOSPITAL ABBOTTABAD

OPD No: 67967 GENERAL OPD Serial No: \_\_\_\_\_

Name: [Signature] Date: 11/09/20

Sex:  Yes  No

W Line:  Yes  No

ASW:  Yes  No

Any Procedure:  Yes  No

Examination/Advise:  Yes  No

40-45  
Radiology to Bil

lower limb  
O/E

Ram - Pain

[Signature]  
TEACHING HOSPITAL  
ABBOTTABAD

Shukri  
Nasir

Ram - Pain

[Signature]  
**ATTESTED**

[Signature]  
Name of Doctor

Signature: [Signature]  
11/09/20

11/15/51

DEPARTMENT OF THE ARMY  
HEADQUARTERS  
WASHINGTON, D.C.

RECEIVED  
GENERAL INVESTIGATIVE  
DIVISION  
NOV 15 1951

Handwritten notes and signatures, including a large signature that appears to be "Theodore H. White" and other illegible scribbles.

## جواب فائل شوکا ز نوٹس

مجاہد جناب دفتر SP صاحب SSU/CPEC مورخہ 21/06/2022

جناب عالی!

مشمولہ شوکا ز نوٹس معروض خدمت ہوں کہ سائل کو بوجہ گھریلو ایمر جنسی/تعمیر و مرمتی رہائشی مٹی چھت/شکستہ مکان۔ رخصت کلاں کی فوری ضرورت تھی۔ جو سائل نے مورخہ 28/03/2022 کو اپنے پلاٹون انچارج سے رخصت درخواست Forward کروانے کے بعد مورخہ 30/03/2022ء 11 چوکی شتیال کو ہستان سے روانگی کر کے دفتر جناب SP صاحب مانسہرہ پہنچا جو افسران نے سائل کی درخواست Forward کرتے ہوئے جناب SP صاحب north مانسہرہ نے سائل کی درخواست پر سائل کو 45 یوم رخصت دینے کی سفارش بھی لکھ دی۔

چونکہ سائل خود افسران بالا پیش ہو کر پورے 03 ماہ کی رخصت لینا چاہتا تھا اس لیے اصل درخواست سائل کے پاس موجود تھی مگر اچانک سے سیاہی کی بوتل درخواست پر گر پڑی جس کی وجہ سے رپورٹ DSP صاحب مکمل طور پر خراب ہو گئی جو پڑھنے کے قابل بالکل نہ رہی۔ اگرچہ ایسی سیاہی آلود درخواست افسران بالا کو پیش بھی کر دیتا تب بھی یقیناً افسران بالا سائل کو رخصت دے دیتے۔ مگر سائل نے سیاہی آلود اور خراب شدہ درخواست افسران بالا کو پیش کرنا مناسب نہ سمجھا اس لیے نیک نیتی سے سیاہی آلود جگہ پر سفید کاغذ لگا دیا تاکہ درخواست بری نہ لگے۔

حالانکہ رپورٹ DSP صاحب سائل کے خلاف تو نہ تھی اگر خلاف بھی ہوتی تب بھی جناب SP صاحب کی 45 یوم کی سفارش کے بعد سائل کو درخواست پر کوئی chiting کرنے کی ضرورت نہ تھی اور نہ ہی اس بات میں سائل کی دیدہ دانستہ کوئی غلطی یا بد نیتی شامل تھی۔ کیونکہ سائل نے خود بخود دفتر جناب SP صاحب جا کر OSI صاحب کو یہ بات بتا بھی دی جسکی وجہ سے پیشی کے باوجود سائل کو رخصت نہ مل سکی۔

چونکہ سائل چوکی شتیال سے روانگی کر کے پشاور گیا تھا اس لیے بعد فراغت پیشی براستہ ایبٹ آباد کو ہستان کے لیے روانہ ہوا جو ایبٹ آباد پہنچ کر پتہ چلا کہ سائل کا رہائشی مٹی چھت مکان گر چکا ہے اور سامان باہر پڑا ہے۔ سائل نے یہ اطلاع دینے کے لیے چوکی انچارج سے رابطہ کیا تو پتہ چلا کہ 30/03/2022 کی روانگی کے باوجود 30/03/2022 کو RI صاحب نے سائل کی رپورٹ غیر حاضری لکھ دی ہے۔

ATTESTED

سائل کی سابقہ شوکا ز/ چارج شیٹ میں غیر حاضری کا کوئی ذکر نہ تھا اور نہ ہی غیر حاضری کے متعلق علیحدہ سے کوئی شوکا ز ملا اور نہ ہی انکو ایف افسر صاحب نے غیر حاضری کے بارے میں کوئی بات پوچھی اس لیے انکو ایف افسر صاحب کو غیر حاضری کے متعلق جواب نہ دیا گیا۔

غیر حاضری کے متعلق معروض خدمت ہوں کہ ایبٹ آباد پہنچ کر کوہستان جانے لگا تھا کہ ایک طرف چھٹی کا نہ ملنا اور دوسرے طرف سائل کے رہائشی مکان کے گر جانے کی خبر سن کر سائل اس پریشانی کی وجہ سے شدید بیمار ہو گیا اس لیے واپس چوکی نہ جاسکا اور برائے علاج معالجہ ہسپتال چلا گیا۔ جو ڈاکٹر صاحب نے بعد علاج معالجہ ادویات وغیرہ دیں اور میڈیکل ریسیٹ بھی دی اور سائل گھر میں پڑا رہا اور ادویات استعمال کرتا رہا اور خود متاثرہ مکان کا کچھ کام کاج بھی نہ کر سکا۔ کچھ قرض وغیرہ لے کر مستری و مزدور کے ذریعے متاثرہ مکان کا کچھ تھوڑا بہت کام کر دیا مگر زیادہ تر مکان کا کام ابھی تک نامکمل اور ادھورا پڑا ہے۔ کیونکہ سائل ایک غریب آدمی ہے اور مسلسل Pay سٹاپ کی وجہ سے مکان کا کام بدستور سٹاپ ہو کر رہ گیا ہے جبکہ متاثرہ مکان کے ثبوت بھی سائل کے پاس موجود ہیں۔

عالیجا!

سائل نے دیدہ دانستہ طور پر نہ تو کوئی غلطی کی اور نہ ہی جان بوجھ کر غیر حاضری کی اور نہ ہی سائل ایسا کر سکتا ہے جناب سے استدعا ہے کہ سائل کے حالات و مجبوری کو مد نظر رکھتے ہوئے عرصہ غیر حاضری کو <sup>MEDICAL</sup> Leave میں شمار کرتے ہوئے سائل کے خلاف جاری شوکا ز داخل دفتر کرنے اور سائل کو معاف کرنے کا حکم صادر فرمایا جائے۔ آئندہ محتاط رہوں گا۔

سائل تا عمر جناب کے بچوں کے لیے دعا گو رہے گا۔

## العارض

سائل محمد اختر IHC/108 پلاٹون نمبر 39، SSU/CPEC

چوکی شتیال ضلع اپر کوہستان

28/04/22

ATTESTED

فائل نمبر رپورٹ

رپورٹ برخلاف ہیڈ کانسٹیبل اختر نمبر HC/108 پلاٹون نمبر 39 تعلق ایٹ آباد

جناب عالی

مشمول فائل شوکار نوٹس نمبر 3759 مورخہ 21-06-2022 بجاریہ جناب SP ایڈمن صاحب پشاور معروض خدمت ہوئے انکو آگواڑی میں محمد اختر HC نمبر 108 پر الزام ہیکہ مذکورہ نے سیکرٹری ایف سر کی تحریر کو بڑی مہارت سے منایا اسی طرح مذکورہ بغیر اجازت یا تحریری رخصت کے مورخہ 30-03-2022 سے 31-05-2022 تک غیر حاضر رہا ابتدائی انکوآڑی جناب اسپیکر فضل معبود خان نے کی۔ جنہوں نے دوران انکوآڑی مذکورہ کا بیان و کراس سوالات کر کے اپنی رائے میں تحریر کیا کہ ہیڈ کانسٹیبل محمد اختر نمبر 108 نے رخصت کلاس کی درخواست پر سینئر افسران کی رپورٹ مٹا کر دوسرے کاغذ کا صاف کٹڑا بڑی مہارت سے لگا کر دھوکا دینے کی کوشش کی رپورٹ میں عادی غیر حاضر باش ہونے کا تحریر تھا۔ انکوآڑی ایف سر نے مذکورہ کو دوران انکوآڑی سزا کا مستحق قرار دیا۔

مذکورہ HC کو فائل شوکار پر اپنا تحریری جواب جمع کرنے کی اطلاع دی گئی۔ مذکورہ نے فائل شوکار کا تحریری جواب طلب کرنے پر پیش خود کیا۔ دعتیاب خندہ ریکارڈ سے پایا گیا کہ مذکورہ HC کے پاس 62 یوم غیر حاضری کا کوئی معقول جواب ریکارڈ پر دعتیاب نہ ہوا۔ اور نہ طلب کرنے پر نہ پیش کر سکا صرف نکان بنانے کا بہانہ بنا تا ہے۔ جس کا کوئی معقول جواب پیش نہ کر سکا۔ اسی طرح درخواست رخصت پر تحریر افسران منانے کا کوئی معقول جواب پیش نہ کر سکا۔ درخواست سیاہی کار کرنا کوئی معقول وجہ نہ ہے۔ پھٹی کی درخواست FIR سے زیادہ اہم نہ ہے اگر FIR میں اندراج وغیرہ غلط اس پر کراس لگا کر دستخط کیا جاتا ہے نہ کہ اسکو منایا جاتا ہے۔

مذکورہ HC کے عرصہ غیر حاضری (62 یوم) کو بلا تخواہ کرنے اور تحریر افسران منانے پر Censure کرنے کی سفارش کی جاتی ہے۔

جملہ انکوآڑی کاغذات ہمراہ لف ہیں رپورٹ عرض ہے۔

جناب عالی

کانسٹیبل زید انکوآڑی محمد اختر نمبر 108

مورخہ 30/06/2022 سے 30/07/2022 تک

مورخہ 30/06/2022 سے 30/07/2022 تک

مورخہ 30/06/2022 سے 30/07/2022 تک

مورخہ 30/06/2022 سے 30/07/2022 تک

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مورخہ 30/06/2022 سے 30/07/2022 تک

مورخہ 30/06/2022 سے 30/07/2022 تک

EC/OASI

① Absence period as treated leave

W/P ay. Deliberately absented from duty

② Being delinquent hence on his law full duties as hereby a top up annual increment apply without accumulation

Attested

ATTESTED



26

JK



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



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

No. 5775-80 EC/SSU,

dated Peshawar the 23 / 08 / 2022.

**ORDER**

This order will dispose the formal departmental inquiry against Head Constable Muhammad Akhtar No. 108 of Special Security Unit (CPEC), District Abbottabad.

Brief facts of the case are that Head Constable Muhammad Akhtar No. 108 was caught cheating with his E-Leave application by removing his senior officer report and he also remained absent from his lawful duties w.e.f. 30.03.2022 up to 31.05.2022 (62 days) and once again from 30.06.2022 up to 20.07.2022 (21 days) for a period of 83 days without any sanctioned leave or permission of the competent authority.

In this regard, his pay was stopped and a proper departmental inquiry was initiated against him. He was issued show cause notice vide this office No. 1916/HQrs/SSU, dated 08.04.2022 by the Undersigned but his reply was not found satisfactory and later on he was issued charge sheet along with summary of allegations vide this office order No. 3008/OHC/SSU, dated 03.06.2022 and Mr. Muhammad Saeed DSP SSU (CPEC), Hazara Region was nominated as enquiry officer to conduct inquiry into the matter. Who after fulfilling all Codal formality submitted his findings report, wherein he reported that the Head Constable received charge sheet and submitted his reply wherein he stated that he mistakenly dropped Ink on the application that's why he has to remove that part of application. Further, he stated that he was constructing his new house due to which he remained absent. The Head Constable was enquired thoroughly but the EO was not satisfied with his reply & recommended that his absence period may be treated as leave without pay alongwith other suitable punishment.

Later on he was issued/served final show cause notice vide this office No. 3759/OASI/SSU, dated 21.06.2022. He was also heard in person in OR but he failed to produce any cogent reason.

Keeping in view the above facts, recommendation of enquiry officer and as well as material available on the record that the above named Head Constable absented himself from his official duties. Therefore, his absence period of (83 days) is hereby treated as leave without pay, being deliberately absented himself from his lawful duties and by removing the remarks of his seniors leave application, hence his one (01) annual increment is hereby stopped with cumulative effect and his pay is released with immediate effect

CB No. 546

Dated 23/08/2022

**ATTESTED**

(FAZAL HANIF)

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

23/08/22

Copy of the above is forwarded for information to the:

1. PA to Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
2. Reader to Dy: Commandant SSU (CPEC), Khyber Pakhtunkhwa Peshawar.
3. Accountant, SRC & LO HQrs. SSU (CPEC), Khyber Pakhtunkhwa Peshawar.

ATTESTED

SP Admn  
22-11-2022

MTC

*[Signature]*

Commandant

SP North

141

For report as per direction please  
of overkey

SP North 141

Recommended

Cheating

SP

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SPSSU-CERT

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*[Signature]*

میڈیکل ریست دے کر مکمل آرام کا مشورہ دیا اور سائل نے اپنی بیماری کے متعلق بروقت چونکہ انچارج کو اطلاع دے دی اور سائل اپنے گھر پر زیر علاج ہی تھا کہ اسی دوران سائل کا وہ رہائشی مکان خود بخود گر چکا جسکی تعمیر و مرتی کیلئے سائل نے 03 ماہ رخصت کلاں کی درخواست دی تھی۔ مگر سائل بوجہ بیماری مکان کا کام بھی نہ کر سکا جو ابھی تک جوں کا توں پڑا ہوا ہے۔ (جس کے ثبوت بھی اسائل کے پاس موجود ہیں)

۶۔ یہ کہ سائل کچھ افاقہ ہونے اور ریست ختم ہونے پر واپس چونکہ شتیال پہنچتا پتہ چلا کہ سائل کی 30-03-2022 کی چونکہ سے روانگی کے باوجود اور اپنی بیماری کی بروقت اطلاع دینے کے باوجود مورخہ 30-03-2022 کو ہی سائل کی رپورٹ غیر حاضری درج کی گئی تھی۔ جس پر سائل کی Pay سٹاپ کر کے سائل کو شوکاژ نوٹس و چارج شیٹ جاری کر کے لائن آفیسر صاحب حیات آباد پشاور کو انکوٹری مارک ہو گئی۔ جب کہ بعد ازاں وہی انکوٹری ڈی۔ ایس۔ پی صاحب مانسہرہ کو بھجوائی گئی تھی۔

۷۔ جس پر جناب ایڈمن SP صاحب SSU-CEPC نے مورخہ 23-08-2022 کو فیصلہ کرتے ہوئے 83 یوم بلا تنخواہ اور ایک سال اینٹکریمنٹ سٹاپ کرنے کا حکم صادر فرمایا۔ اور سائل کی تنخواہ کٹوتی کر دی گئی۔ جب کہ OB نمبر 13،536 یوم کی تنخواہ کٹ کر کل 96 یوم تنخواہ کٹ دی گئی۔

حالیجا:

سائل نے نہ تو دیدہ دانستہ طور پر کوئی چیلنگ کی ہے اور نہ ہی دیدہ دانستہ غیر حاضری کی ہے سائل غریب آدمی ہے جو اتنی تنخواہ کٹوتی برداشت نہیں کر سکتا۔ (غیر حاضری بوجہ بیماری ہوئی ہے جس کا میڈیکل ہمراہ لف ہے)

لہذا آپ جناب سے استدعا ہے کہ سائل کا میڈیکل منظور فرما کر عرصہ غیر حاضری کو میڈیکل یا E-Leave میں شمار کر کے سائل کی کٹوتی شدہ رقم سائل کو واپس دینے کا حکم صادر فرمایا جاوے اور سائل کا اینٹکریمنٹ بحال فرمایا جاوے۔

Sir,

Forwarded

جناب کی عین نوازش ہوگی۔ Add: 16.11.22

المرقوم 21-10-2022

العارض

Superintendent of Police  
SSU CPEC North  
Manshera

محمد اختر IHC/108 پلاٹون نمبر 39 حال پارک کمپ بالا کوٹ، ضلع مانسہرہ

Sir  
forwarded

صفحہ: ۲۵۲

Sir  
forwarded  
28/11/2022

IN SP-CPEC 334  
02-11-2022

ATTESTED

### بھصور جناب انسپکٹر جنرل آف پولیس پشاور خیبر پختونخوا

محکمہ اپیل بوساطت افسران بالا:

برائے (1) بحال کئے جانے اینکڑیمنٹ ایک سال

(2) بحال کئے جانے تنخواہ 96 یوم

جناب عالی! اپیل ذیل عرض ہے۔

1- یہ کہ سائل SSU/CEPC پلاٹون نمبر 39 چوکی شتیال ضلع اپر کوہستان میں تعینات تھا۔ سائل مورخہ 28-03-2022 کو بوجہ گھریلو ایمر جنسی تعمیر و مرمتی رہائشی مٹی چھت مکان 03 ماہ رخصت کلاں کی درخواست دی۔ جو پلاٹون انچارج اور DSP صاحب سے Forwarded ہونے کے بعد جناب SP صاحب نارٹھ مانسہرہ نے سائل کی درخواست Forwarded کرتے ہوئے سائل کی درخواست پر سائل کو 45 یوم رخصت دینے کی سفارش بھی لکھ دی تھی۔

یہ کہ سائل مورخہ 30-03-2022 کو چوکی شتیال ضلع اپر کوہستان سے روانگی کر کے پشاور پہنچا۔ اور بازو پشاور میں درخواست کی نوٹوٹلیٹ کاپی کرواتے ہوئے اچانک سیاہی گر جانے کی وجہ سے درخواست E-Leave کا ایک حصہ اور پورٹ DSP صاحب مکمل طور سیاہی آلود ہو کر خراب ہو گئی جو پڑھنے کے قابل نہ رہی اور درخواست بہت ہی بری لگنے لگی۔

سائل نے دفتر SP صاحب پہنچ کر OHC صاحب کے نوٹس میں لگایا اور پھر محض اس نیت سے سیاہی آلود جگہ پر سفید کاغذ لگا دیا تاکہ درخواست بری نہ لگے اور پھر درخواست بغرض منظوری OHC صاحب کے حوالے کر دی۔ اور پھر خود ہی میڈیمر SF صاحبہ پر پیش ہو کر ان کے نوٹس میں بھی یہ بات لگا دی تھی۔ رپورٹ SRC صاحب کے مطابق بھی سائل کی 1142 یوم رخصت کلاں بنتی تھی۔ مگر سائل پر Cheating کرنے کا الزام عائد کر دیا گیا۔

مگر سائل نے دیدہ و اندرہ طور پر نہ تو کوئی Cheating کی ہے اور نہ ہی سائل ایسا کر سکتا تھا۔ اور پھر جناب SP صاحب نارٹھ مانسہرہ کی 45 یوم کی رخصت Recommended کے بعد رپورٹ DSP صاحب کی Cheating کرنے کا تو سوال ہی پیدا نہیں ہوتا۔ مگر SP صاحب نارٹھ کی رخصت 45 یوم کی رخصت Recommended کے باوجود بھی سائل کو رخصت کلاں نہ مل سکی۔ البتہ سائل کا ایک سال کا اینکڑیمنٹ سٹاپ کر دیا گیا۔

صفحہ 1

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افسردہ

7AM  
ATTESTED

2- یہ کہ سائل پشاور سے واپس کوہستان کیلئے روانہ ہوا چونکہ سائل کو پہلے سے ہی گردن اور کمر درد کی شدید تکلیف تھی جو راستہ میں شدید درد شروع ہو گیا سائل بمشکل ایبٹ آباد پہنچ کر بغرض علاج معالجہ DHQ ہسپتال چلا گیا اور ڈاکٹر صاحب نے بعد کرنے تمام ٹیسٹ، ایکس رے سائل کو مختلف اوقات میں میڈیکل ریٹ دے کر مکمل آرام کا مشورہ دیا اور سائل نے اپنی بیماری اور میڈیکل ریٹ کی اطلاع فوراً اپنے پلاٹون انچارج کو دے دی تھی۔

یہ کہ سائل ابھی گھر پر زیر علاج ہی تھا کہ اسی دوران سائل کا وہ رہائشی مٹی چھت مکان خود بخود گر چکا۔ جسکی تعمیر و مرمتی کے لئے سائل نے رخصت کلاں کی درخواست دی تھی۔ مگر سائل نے بیماری کی وجہ سے مکان کا کام بھی نہ کر سکا۔

کچھ افاقہ ہونے اور ریٹ ختم ہونے پر سائل واپس چوکی شتیال پہنچا تو پتہ چلا کہ مورخہ 30-03-2022 کی روانگی کے باوجود اور بیماری کی اطلاع کے باوجود مورخہ 30-03-2022 کو ہی سائل کی رپورٹ غیر حاضری درج کی گئی تھی۔ جس پر چارج شیٹ جاری ہو کر اور Pay سٹاپ کر کے لائن آفیسر صاحب حیات آباد کو انکواری مارک ہوئی۔ جب کہ بعد میں وہی انکواری DSP/SSU صاحب مانسہرہ کو بھجوائی گئی تھی۔ 4/5 ماہ تک انکواری ہونے کے بعد جناب ایڈمن SP صاحب نے مورخہ 23-08-2022 کو OB/546 فیصلہ کرتے ہوئے سائل کا ایک سال اینٹکریمینٹ سٹاپ کرنے اور 83 یوم بلا تنخواہ کا حکم صادر فرمایا جب کہ OB/536 13 یوم بلا تنخواہ کرتے ہوئے سائل کی کل 96 یوم تنخواہ کٹوتی کر دی گئی۔ سائل نے جناب کمانڈنٹ صاحب کو درخواست دی مگر شنوائی نہ ہوئی۔

عالیجا:

سائل غریب آدمی ہے جو اتنی سزا و تنخواہ کٹوتی برداشت نہیں کر سکتا۔ غیر حاضری بوجہ بیماری ہوئی ہے جس کا میڈیکل معہ جملہ کاغذات ہمراہ لف ہیں۔

لہذا بذریعہ درخواست استدعا ہے کہ سائل کا میڈیکل منظور فرما کر سائل کی کٹوتی شدہ تنخواہ واپس دی جاوے اور سائل کا ضبط شدہ اینٹکریمینٹ بحال کرنے کا حکم صادر فرمایا جاوے۔  
جناب کی عین نوازش ہوگی۔

المرقوم 2023/ 6266

الحارث

محمد اختر IHC/108 پلاٹون نمبر 39 حال پارس کیمپ بالا کوٹ، ضلع مانسہرہ

صفحہ: ۲۲۲

ATTESTED





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

No. S/ 1621 /23, dated Peshawar the 13/06/2023.

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

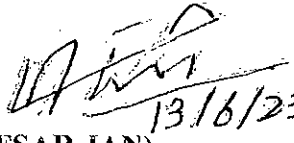
Subject: - **REVISION PETITION.**

Memo:


Please refer to your office Memo: No. 4282/EC, dated 11.05.2023.

The Competent Authority has examined and filed the revision petition submitted by IIC Muhammad Akhtar No. 108 of SSU (CPEC) against the punishment of stoppage of one annual increment with cumulative effect & absence of 83 days treated as leave without pay awarded by SP Admin & Minority SSU (CPEC) vide order Endst: No. 5775-80/EC, dated 23.08.2023, being badly time barred.

The applicant may please be informed accordingly.

  
13/06/23  
(AFSAR JAN)

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

  
**ATTESTED**



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

No. S/ 1621 /23, dated Peshawar the 13/06/2023.

To : The Commandant,  
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Khyber Pakhtunkhwa, Peshawar.

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The applicant may please be informed accordingly.

(AFSAR JAN)

Registrar,

For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

*[Handwritten signature]*  
*[Handwritten signature]*  
04/09/23

*[Handwritten signature]*  
**ATTESTED**





**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

**Appeal No: 1095/24**

Diary No. 14884

Dated 12-08-24

Muhammad Akhtar

VERSUS

Govt of KPK & Others

**APPLICATION FOR TRANSFER OF  
ABOVE TITLED APPEAL FROM  
PESHAWAR FROM ABBOTTABAD  
BENCH**

**Respectfully Sheweth:**

1. That the above titled service appeal was filed by the appellant regarding stoppage of increment, and today i.e. 12/08/2024 was fixed for hearing, and the next date of hearing is 17/09/2024.
2. That because the appellant has service duty in District Abbottabad Circle Galiyat, and because of the same reason it is quite difficult for appellant to present himself on each and every date from Abbottabad to Peshawar.

3. That there is no legal bar in acceptance of instant application.

*It is, most humbly requested that on acceptance of instant application, the service appeal of the appellant may kindly be transferred from Peshawar to Camp Courts, Abbottabad for best interest of justice.*

Dated: 12-8-2024

Applicant/ Appellant

In person



**Muhammad Akhtar**

ASI. Bagnutor

District Abbottabad