

Sr. No	Date of order/proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	07.05.2019	<p align="center"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u> <u>Camp Court, Swat</u> Service Appeal No. 578/2018</p> <p>Date of Institution 26.04.2018 Date of Decision 07.05.2019</p> <p>Raj Malook (Ex-Senior Clerk) Police Investigation Wing Buner R/o Village Bajkata Tehsil Gagra Buner.</p> <p align="right">Appellant</p> <p align="center">Versus</p> <ol style="list-style-type: none"> 1. District Police Officer Buner. 2. S.P/Head of Investigation District Buner. 3. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar. 4. Deputy Inspector General of Police, Malakand Region Saidu Sharif Swat. 5. Deputy Inspector General of Police (HQRs) Khyber Pakhtunkhwa, Peshawar. <p align="right">Respondents</p> <p>Mr. Muhammad Hamid Mughal-----Member(J) Mr. Hussain Shah -----Member(E)</p> <p align="center"><u>JUDGMENT</u> <u>MUHAMMAD HAMID MUGHAL, MEMBER:</u> - Appellant</p> <p>with counsel and Mr. Mian Amir Qadir learned District Attorney present.</p> <p>2. The appellant (Ex-Senior Clerk) has filed the present appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 26.01.2018 whereby major punishment of dismissal from service was awarded to him on the ground of non-compliance of his posting transfer order dated 28.09.2017 from the</p>

Handwritten signature and date: 7.5.2019

office of Superintendent of Police Investigation District Buner to the office of District Police Officer Bannu. The appellant has also assailed the order dated 05.04.2018 through which his departmental appeal against the order of his dismissal from service, was rejected.

3. Learned counsel for the appellant argued that the appellant joined the respondent department in the year 1991; that in the year 2017, when the appellant was suffering from mental diseases, he was transferred from the office of Superintendent of police Investigation District Buner to the office of District Police Officer Bannu; that due to mental illness the appellant remained unable to join the duty at DPO office Bannu; that the respondent department conducted so-called disciplinary action against the appellant and was awarded major punishment of dismissal from service vide order dated 26.01.2018; that the departmental appeal of the appellant against the punishment order was rejected; that the impugned orders are against law, facts and norms of justice; that the departmental proceeding against the appellant is based on ill will; that the punishment awarded to the appellant is extremely harsh and excessive; that the appellant is willing to serve at District Bannu in compliance with posting transfer order dated 28.09.2017.

4. As against that learned District Attorney argued that the appellant availed 730 days extraordinary leave; that the appellant deliberately disobeyed his posting transfer order dated 28.09.2017; that astonishingly the appellant allegedly got ill only after the issuance of his posting transfer order from District Buner to District

7.5.2019

Bannu; that due to non-compliance of the transfer posting order dated 28.09.2017 proper charge sheet/statement of allegation was served upon the appellant; that inquiry committee found the appellant guilty; that final Show Cause Notice was also served upon the appellant and after fulfillment of all the legal requirements, the appellant was rightly awarded punishment.

5. Arguments heard. File perused.

6. The appellant did not honor the posting transfer order dated 28.09.2017 resultantly disciplinary action was taken against him. The appellant was placed under suspension vide order dated 16.11.2017. Charge sheet/statement of allegation was issued to the appellant, which he also replied. The inquiry committee found that the appellant could not provide any cogent reason for disobeying the lawful orders of the competent authority and not reporting to his place of posting and that he is guilty of gross misconduct. Final Show Cause Notice was issued to the appellant, to which he also filed his reply. Perusal of the original impugned order would show that opportunity of personal hearing was also afforded to the appellant. In the given circumstances, this Tribunal is of the opinion that punishment was awarded to the appellant after observing the legal requirements.

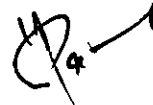
7. It may be observed that there is no denying the fact that the appellant had a reasonable length of service at his credit and that there is no allegation of corruption against him, moreover the appellant is willing to perform his duties at the office of DPO

7.5.2018

Bannu. In view of the circumstances of the case, the punishment awarded to the appellant appears to be harsh. Consequently, for the purpose of safe administration of justice, the major punishment of dismissal from service awarded to the appellant is hereby modified and converted into minor punishment of forfeiture of three (03) annual increments for a period of three (03) years. Resultantly the appellant is reinstated in service. The intervening period shall be treated as extraordinary leave without pay. The present service appeal is partially accepted in the above terms. Parties are left to bear their own costs. File be consigned to the record room.



(Hussain Shah)
Member



(Muhammad Hamid Mughal)
Member
Camp Court, Swat.

ANNOUNCED
07.05.2019

03.04.2019

Appellant in person present. Mian Amir Qadir learned District Attorney alongwith Aman Khan ASI present. Written reply on behalf of newly impleaded respondent i.e. respondent No.5 submitted. Adjourn. To come up for ~~written reply/arguments on~~ 07.05.2019 before D.B. at Camp Court Swat ~~present on behalf of respondents No.1 and 2 to~~ ~~present on behalf of respondent No.2~~ ~~respondent No.2 with direction to furnish written reply/comments.~~ ~~Adjourn. To come up for written reply/comments on behalf of respondent No.2 on 10.06.2019 before S.B. at Camp Court Swat.~~

07.05.2019

Appellant with counsel and Mr. Mian Amir Qadir learned District Attorney present. ~~Vide separate judgment~~ of today of this Tribunal placed on file, the punishment of dismissal from service awarded to the appellant is hereby modified and converted into minor punishment of forfeiture of three (03) annual increments for a period of three (03) years. Resultantly the appellant is reinstated in service. The intervening period shall be treated as extraordinary leave without pay. The present service appeal is partially accepted in the above terms. Parties are left to bear their own costs. File be consigned to the record room.



(Hussain Shah)
Member



(Muhammad Hamid Mughal)
Member

Camp Court, Swat.

ANNOUNCED

07.05.2019

578/18

04.03.2019

This order is proposed to dispose of an application for impleadment of Deputy Inspector General of Police (Headquarters) Khyber Pakhtunkhwa Peshawar as one of the respondents.


The application is resisted by the respondents by submission of a reply, wherein, it is noted that the application is barred by time and the petitioner has no cause of action against the respondent intended to be impleaded.

The contents of application suggest that due to clerical mistake, the Deputy Inspector General of Police Malakand Region was arrayed as respondent No. 4 while the impugned order, dated 26.01.2018, was passed by the Deputy Inspector General of Police (Headquarters) Khyber Pakhtunkhwa Peshawar. The said impugned order was duly made part of the record and is available at pages 39 and 40 of the file.

In the case in hand no personal grievance has been claimed by the appellant against the D.I.G Malakand Region and it is the order of dismissal of appellant which is essentially impugned in the appeal. The same has been passed by the D.I.G Police (Headquarter) Peshawar who appears to be a necessary party for all intents and purposes in the matter in hand.

In view of the above, application is allowed. The DIG (Headquarter) Khyber Peshawar shall be entered as respondent No. 5 and be issued notice for submission of reply/comments in the appeal on 03.04.2019 before S.B at camp court, Swat.


Member


Chairman
Camp Court, Swat 

07.02.2019

Learned counsel for the appellant and Mian Amir Qadar learned Deputy District Attorney present. Learned counsel for the appellant submitted an application to implead Deputy Inspector General of Police Headquarter Khyber Pakhtunkhwa Peshawar as respondent No.5. Learned DDA resisted the said application and requested for submission of reply and arguments on the said application. Adjourn. To come up for reply and arguments on the said application on 04.03.2019 before D.B at camp Court Swat.




Member



Member
Camp Court Swat.


01.10.2018

Appellant in person present. Mr. Noshewan, S.I (Legal) alongwith
alongwith Mr. Usman Ghani, District Attorney for the respondents
present. Written reply not submitted. Representative of the respondents
sought some time to submit the same on the next date. Case to come up for
written reply on 03.12.2018 before S.B at camp court Swat.


Member
Camp Court Swat

03.12.2018


Learned counsel for the appellant and Mr. Usman
Ghani learned District Attorney alongwith Mr.
Bahramand Inspector present. Representative of the
respondents submitted written reply which is placed on
file. Adjourn. To come up for rejoinder if any and
arguments on 06.02.2019 before D.B at Camp Court
Swat.


Member
Camp Court Swat

06.02.2019

Appellant in person and Mian Amir Qadar learned Deputy
District Attorney alongwith Noshewan SI present. Due to
general strike of the bar, the case is adjourned. Appellant
requested that the case may be fixed for tomorrow. Request
accepted. To come up for arguments on 07.02.2019 before
D.B at camp Court Swat.

Member


Member
Camp Court Swat.

06.07.2018

Appellant Rajwali in person alongwith his counsel Mr. Shamsul Hadi, Advocate present. Preliminary arguments heard.

Contends that the appellant has been dismissed from serve ice on account of absence from duty but he was sick and could not join duty and in this respect hje has already submitted medical prescriptions to the authority.

Points raised need consideration. The appeal is admitted for regular hearing, subject to all legal objections, if raised by the respondents. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 03.09.2018 before S.B at camp court, Swat.

Appellant Deposited
Security & Process Fee



Chairman
Camp court, Swat

03.09.2018

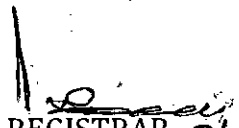

None for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Written reply not submitted. Learned District Attorney sought some time to submit the same. Granted. Case to come up for written reply/comments on 01.10.2018 before S.B at camp court Swat.

(AHMAD/HASSAN)
MEMBER
Camp Court Swat

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 578/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	26/04/2018	<p>The appeal of Mr. Raj Malook presented today by Mr. Shamsul Hadi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 26/4/18</p>
2-	15-5-2018	<p>This case is entrusted to Touring S. Bench at Swat for preliminary hearing to be put up there on <u>06-07-2018</u></p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR.**

C.M No. _____ of 2019
In
Service Appeal No.578 /2018.

Raj Malook.....Appellant

V E R S U S

I.G police Khyber Paktunkhwa and others.....Respondents

**REJOINDER ON BEHALF OF APPELLANT IN
RESPONSE TO THE REPLY FILED BY RESPONDENTS.**

Respectfully Sheweth:

Preliminary Objections:

1. Para No. 1 to 6 of the comments is Incorrect.

FACTS:

Para No.1 needs no comments

Para No.2 is incorrect because the appellant was under treatment before transfer order as the same is evident from the record and the same has also been accepted by the inquiry officer and issue of illness of appellant further strengthened when the concerned authority accepted his leave application on belated stage but granting of medical leave is clearly showing that the appellant was seriously ill.(Copy of medical leave granting order is attached)

Para No.3 of the reply is incorrect as stated above.

Para No.4 incorrect because the appellant was not treated according to law and procedure and name of Deputy inspector

General of Police (HQrs) Khyber Pakhtunkhwa, was inadvertently mentioned as DIG Malakand Range due to clerical mistake and for correction and impleading the said official the respondent has already moved an application.

Para No.5 is incorrect because the appellant with documentary evidence satisfied the said authority but latter on with ill intention his departmental appeal was illegally dismissed.

Grounds:

- A. Incorrect.
- B. Incorrect.
- C. Incorrect, already explained in preceding paras.
- D. Incorrect.
- E. Incorrect.
- F. Incorrect.

It is, therefore prayed that on acceptance of this rejoinder this Hon'ble Tribunal may be pleased to accept the appeal as prayed for and the respondents be burdened with heavy cast.

Appellant

Through


Shams-ul-Hadi

Advocate High Court,

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR.**

C.M No. _____ of 2019
In
Service Appeal No.578 /2018.

Raj Malook.....Appellant

V E R S U S

I.G police Khyber Paktunkhwa and others.....Respondents

AFFIDAVIT

I, **Shams-ul-Hadi**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



ADVOCATE



FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA
POLICE GAZETTE PART-II ORDERS OF THE
INSPECTOR GENERAL OF POLICE KHYBER
PAKHTUNKHWA PESHAWAR

Dated: 5/01/2018.

NOTIFICATION.

No. 253-59 /E-V, MEDICAL LEAVE: - Mr. Raj Malook
Senior Clerk of Investigation Wing, Buner is hereby granted 30-days
Medical Leave w.e.f 20.12.2017 on full pay under the revised Leave Rules
1981.

Sd/-
(SHER AKBAR)
PSP, S.Si
DIG: HQs
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. & date even.

Copy forwarded to the: -

- Addl: Inspector General of Police HQs: Khyber Pakhtunkhwa,
Peshawar.
- Deputy Inspector General of Police, HQs, CPO Peshawar.
- PA to Assistant Inspector General of Police Estt: CPO Peshawar.
- Registrar CPO, Peshawar.
- SP/Investigation Wing Buner.
- Office Supdt: Secret CPO Peshawar.
- In-Charge Central Registry Cell CPO, Peshawar.

(AHSAN SAIFULLAH) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

17/1/18 EIC

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

CM-N0. _____ of 2019

In
Service Appeal No. 578/2018
Raj Malook Appellant

VERSUS

IG Police Khyber Pakhtunkhwa and Others.

..... Respondents

**REPLY TO THE APPLICATION OF APPELLANT FOR IMPLEADMENT TO
ARRAY DEPUTY INSPECTOR GENERAL OF POLICE HQRs: AS
RESPONDENT NO.5 IN THE LIST OF RESPONDENTS.**

Preliminary Objections:-

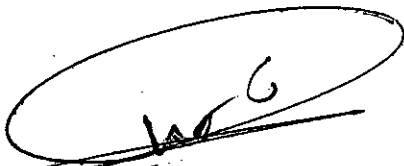
1. That the petitioner has not come to this Tribunal with clean hands.
2. That the application is time barred.
3. That the petitioner has no cause of action against the respondent, hence application for impleadment is liable to be dismissed.

Respectfully Sheweth:

1. Para No. 01 is correct.
2. Incorrect: that the appellant was well aware about his dismissal order dated 26.01.2018, which was passed by Deputy Inspector General of Police HQRs: Peshawar and the appellant himself annexed copy of same order with his Service Appeal therefore it could not be believed as clerical mistake.
3. No comments.

✓ Prayer:

In view of the above reply to the application of the appellant it is humbly prayed that the application of the petitioner/ appellant may please be dismissed with cost.


Nosharamon Inspector legal
representative for
respondents.

Respondents
Through


Deputy District Attorney Service
Tribunal at Camp Court Swat.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

CM-N0. _____ of 2019

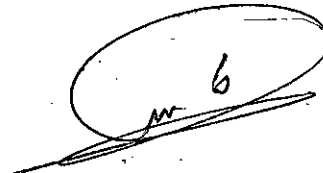
In
Service Appeal No. 578/2018
Raj Malook Appellant

VERSUS

IG Police Khyber Pakhtunkhwa and Others.
..... Respondents

AFFIDAVIT

I Nowsherawan Inspector legal as representative for respondents do hereby solemnly affirm and state on oath that the hole contents of the reply to the application of appellant for impleadment are correct and true to the best of my knowledge and belief that nothing has been concealed from this Honorable Tribunal.



(Nowsherawan)
**INSPECTOR LEGAL
BUNER**
(Representative for respondents)

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR.**

C.M No. _____ of 2019
In
Service Appeal No.578 /2018.

Raj Malook.....Appellant

V E R S U S

I.G police Khyber Paktunkhwa and others.....Respondents

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Through



Shams-ul-Hadi

Advocate High Court,

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR.**

C.M No. _____ of 2019
In
Service Appeal No.578 /2018.

Raj Malook.....Appellant

V E R S U S

I.G police Khyber Paktunkhwa and others.....Respondents

AFFIDAVIT

I, **Shams-ul-Hadi**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **Rejoinder** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



ADVOCATE



FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA
POLICE GAZETTE PART-II ORDERS OF THE
INSPECTOR GENERAL OF POLICE KHYBER
PAKHTUNKHWA PESHAWAR

Dated 5/01/2018.

NOTIFICATION.

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Medical Leave w.c.f 20.12.2017, on full pay under the revised Leave Rules
1981.

Sd/-
(SHER AKBAR)
PSP, S.St
DIG: HQs
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. & date even.

Copy forwarded to the: -

- Addl: Inspector General of Police HQs: Khyber Pakhtunkhwa,
Peshawar.
- Deputy Inspector General of Police, HQs, CPO Peshawar.
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- In-Charge Central Registry Cell CPO, Peshawar.

(AHSAN SAIFULLAH) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

[Handwritten signature and date]
13/1/18

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 578 /2018.

Raj Malook.....Appellant

V E R S U S

I.G police Khyber Paktunkhwa and others.....Respondents

I N D E X

S.N	Description of Documents	Annex	Pages
1.	Memo of Appeal along with Affidavit.		1---5
2.	Addresses of the Parties		6
3.	Copy of transfer order	A	7
4.	Copies of application for leave.	B	8-9
5.	Copies of departmental proceedings and impugned office order dated:26.01.2018.	C	10-40
6.	Copy of Departmental appeal and impugned order dated:05.04.2018	D	41-44
7.	Wakalat Nama		45

Appellant

Through



Shams ul Hadi

Dated: 19/04/2018.

Advocate, Peshawar.

Office: St/3 Abshar Colony

Warsak Road Peshawar.

Cell No. 0347-4773440

①

BEFORE THE KHYBER PAKHTOON KHWA SERVICES
TRIBUNAL, PESHAWAR

Service Appeal No. 578 /2018.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 627

Dated 26-4-2018

Raj Malook (Senior Clerk) Police Investigation Wing Bunir.

R.o Village Bajkata Tehsil Gagra Bunir.....Appellant

V E R S U S

1. District Police Officer, Bunir.
2. S.P/Head of Investigation District Bunir
3. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
4. Deputy Inspector General of Police, Malakand Region,

Saidu Sharif Swat.....Respondents

⑤ Deputy Inspector General of Police (HORS) IGP Peshawar

Respondent no-5
Impugned by
respondent with
order dt 4/3/18.

APPEAL UNDER SECTION 4 OF KHYBER
PUKHTUNKHWA SERVICES TRIBUNAL ACT
1974 AGAINST THE IMPUGNED OFFICE
ORDERS DATED:26.01.2018 AND
05.04.2018.

Filed to-day
Registrar
26/4/18

PRAYER IN APPEAL:

On acceptance of this appeal the impugned Orders dated:05.04.2018 and 26.01.2018 of Dismissal from service of the appellant may kindly be set aside and the appellant may kindly be re-instated t with all back benefits of service.

Respectfully Sheweth:

1. That initially the appellant joined the respondent/department since long and as such performing his duties with zeal and zest and till date no compliant what so ever has been recorded from any quarter and finally the appellant was promoted to the post of Senior Clerk.

2. That in the year 2017, the appellant suffered a lot from some mental deceases and as such during his illness period, the appellant was transferred to DPO office Bannu vide office order dated:28.09.2017.(Copy of transfer order is annexure-A)

3. That the appellant was un-able to join the duties at DPO office Bannu because the doctors advised him complete bed rest and in this respect the appellant requests for leave through written application hence the appellant did not joined his duties within stipulated period.(Copies of application is annexure-B)

4. That latter on, the respondent Nos.1 and 3 initiates separate so-called departmental disciplinary proceedings against the appellant, which find no mention in the eyes of law and as such without proper inquiry the appellant was awarded major punishment i-e dismissal from service vide impugned office order

dated:26.01.2018.(Copies of departmental proceedings and impugned office order dated:26.01.2018 are annexure-C)

- 5. That against the impugned order dated:26.01.2018, the appellant filed departmental appeal before the Resp No.3 but same was also rejected vide impugned order dated:05/04/2018.(Copy of departmental appeal and impugned order dated:05.04.2018 are annexure- E)

That being aggrieved from the impugned orders, the appellant approached this Hon'ble Tribunal on the following grounds amongst other inter alia:

GROUND:

- A. That the impugned office orders are against facts, law and procedure; hence, untenable being unjust and unfair.
- B. That the appellant was not treated in accordance with law and rules, thus acted in violation of the relevant laws laid down for the purpose.
- C. That the whole departmental proceedings against the appellant was based on personal ill will and with ill intention a harsh and illegal penalty was imposed on the appellant.

- D. That no opportunity in shape of personal hearing was afforded to the appellant during enquiry proceedings and as such the statement and evidence was recorded in absence of the appellant which clearly showing the ill intention of the appellant.
- E. That the incompetent authority has awarded the penalty to the appellant so the punishment awarded to the appellant is illegal.
- F. That any other ground may be adduced during the course of argument, with the kind permission of this Hon'ble Court.

It is, therefore, most humbly prayed that *On acceptance of this appeal the impugned Orders dated:05.04.2018 and 26.01.2018 of Dismissal from service of the appellant may kindly be set aside and the appellant may kindly be re-instated t with all back benefits of service.*

Raj Malhotra

Appellant

Through

Shams ul Hadi
Advocate, Peshawar.

Dated: 19/04/2018

BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2018.

Raj Malook.....Appellant

V E R S U S

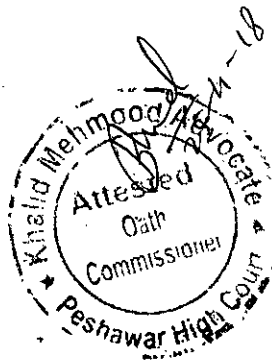
I.G police Khyber Paktunkhwa and others.....Respondents

AFFIDAVIT

I, **Shams ul Hadi**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



ADVOCATE



BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2018.

Raj Malook.....Appellant

V E R S U S

I.G police Khyber Paktunkhwa and others.....Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Raj Malook (Senior Clerk) Police Investigation Wing Bunir.

R.o Village Bajkata Tehsil Gagra Bunir

RESPONDENTS:

1. District Police Officer, Bunir.
2. S.P/Head of Investigation District Bunir
3. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
4. Deputy Inspector General of Police, Malakand Region, Saidu Sharif Swat

Appellant

Through

Shams ul Hadi
Advocate, Peshawar.

Dated: 19/04/2018

Annex A

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR
Ph: 091-9210545 Fax: 091-9210927
E-Mail: OSEstabV@gmail.com

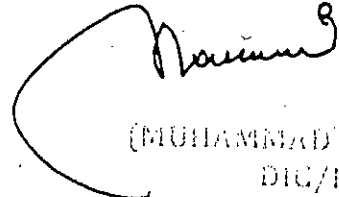
(7)

No. 5827-35/E-V

Dated, Peshawar the 28/9/ Sept. 2017

ORDER.

Senior Clerk Raj Malook of Investigation Wing, Bunir is hereby transferred and posted to the office of DPO/Bannu with immediate effect.



(MUHAMMAD DALI KHAN) PSP
DIC/HQs:
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar



Ends: No. & date even.

Copy forwarded to the:-

- Addl: Inspector General of Police HQs: Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police, HQs: CPO-Peshawar.
- Assistant Inspector General of Police: E. O: CPO Peshawar.
- SP/Investigation Wing, Bunir with the direction to relieve the above named Senior Clerk to report for duty at the office of DPO/Bannu within two days positively
- District Accounts Officer Bunir & Bannu.
- Registrar CPO, Peshawar.
- Office Supdt: Secret CPO Peshawar.
- in-Charge Central Registry Cell CPO, Peshawar

ATTESTED

7

BETTER COPY

**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNHWA
CENTRAL POLICE OFFICE
PESHAWAR**

Ph:-091-9210545 Fax:-091-9210927

Email:-OSEstabV@gmail.com

No.5827-35/E-V

Dated Peshawar the 28/09/Sept, 2017

ORDER

Senior Clerk Raj Malook of investigation Wing, Bunir is hereby transferred and posted to the office of DPO/Bannu with immediate effect.

(Muhammad Ali Khan) PSP

DIG/HQrs:

For Inspector General of Police

Khyber Pakhtunkhwa

Peshawar

Endst No.& date even:-

Copy forwarded to the:-

1. Addl Inspector General of Police HQrs Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, HQrs, CPO, Peshawar.
3. Assistant Inspector General of Police Est: CPO, Peshawar.
4. SP/Investigation Wing, Bunir with the direction to relieve the above named Senior Clerk to report for duty at the office of DPO/Bannu within two days positively.
5. District Accounts Officer Bunir & Bannu.
6. Registrar CPO, Peshawar.
7. Office Sutdt: Secret CPO Peshawar.
8. Incharge General Registry Cell CPO, Peshawar

ATTESTED

8

Annexure.

"B"

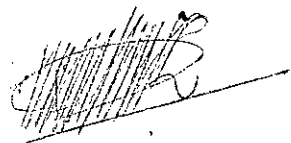
R/Sir

It is stated with due respect that I am suffering from mental deficiency and the doctor advised me complete bed rest for 3 weeks w-e from 2-10-2017.

It is therefore, requested that kindly grant me rest for 21 days on medical ground and obliged. (Medical report consisting of 8 pages)
Thank


ATTESTED

yours Obedient



Raj Malook

Investigation Office

Buner

9

Subject:

APPLICATION FOR EXTENSION IN MEDICAL LEAVE.

R/Sir,

It is submitted that my uncle Raj Malook is working as Senior Clerk in your good office. He has been suffering from mental diseases and the doctor had advised complete bed rest to him for 03-weeks w.e.f. 02.10.2017.


He was again produced for check up before the Consultant Psychiatrist, Govt. Sarhad Hospital on 18.10.2017 who has advised further bed rest to him for one month w.e.f. 24.10.2017 (photocopy of the remarks of concerned Consultant Psychiatrist is enclosed).

It is therefore, request that his leave may please be extended for one month w.e.f. 24.10.2017 on medical grounds please.

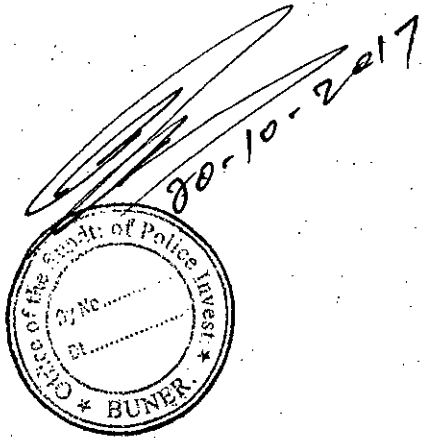
Dated 20.10.2017

Encl: (9)

Yours Obediently,



(ABDUR REHMAN)
Nephew of Raj Malook,
Senior Clerk,
o/o the Head of Investigation, Buner




ATTESTED

Aunex C²

NO. 61 /Enquiry,

Dated 19/10 /2017.

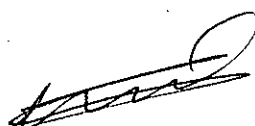
10

CHARGE SHEET

I **Muhammad Irshad**, District Police Officer, Buner as competent authority, under Khyber Pakhtunkhwa Efficiency Rules-1975, hereby charge you **SC Raj Malook** while posted to Investigation Office District Buner as follow:-

1. You SC Raj Malook while posted to Investigation Office District Buner, did not obey the order of your superior regarding transfer posting from District Buner to District Bannu, time and again you were directed and contacted on your cell No. to report the new place of posting i.e DPO Office Bannu but invain and still remain absent from the date of transfer to Bannu. Your this act amounts to gross misconduct on your part which rendered you liable to be proceeded against departmentally under Police Disciplinary Rules-1975.
2. By reasons of the above, you appear to be guilty of misconduct and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Disciplinary Police Rules, 1975.
3. You are; therefore, require to submit your written reply within **07 days** of the receipt of this Charge Sheet to the Enquiry Officer under Rules-6 Sub Rules (i) (b) of Police Disciplinary Rules 1975.
4. Your written reply, if any, should reach the Enquiry Committee within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.
5. Intimate as to whether you desire to be heard in person or not?
6. A statement of allegations is enclosed


ATTESTED


(Muhammad Irshad)
District Police Officer,
Buner

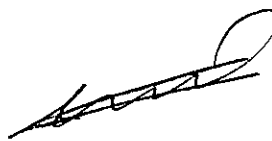
11

DISCIPLINARY ACTION

I Muhammad irshad District Police Officer, Buner as competent authority, under Khyber Pakhtunkhwa Efficiency Rules-1975, is of the opinion that SC Raj Malook while posted to Investigation Office have rendered himself liable to be proceeded against departmentally and committed the following acts/omission as defined in Efficiency Rules 1975.

STATEMENT OF ALLEGATIONS

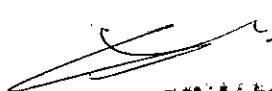
1. He SC Raj Malook while posted to Investigation Office District Buner, did not obey the order of your superior regarding transfer posting from District Buner to District Bannu time and again you were contacted on your cell No. to report the new place of posting i.e DPO Office Bannu but invain and still remain absent from the date of transfer to Bannu. His this act of misconduct/negligence on his part which rendered him liable to be proceeded against departmentally under Police Disciplinary Rules-1975.
2. For the purpose of scrutinizing the conduct of said officer with reference to the Above allegations Mr. Muzakir Shah SDPO Daggar is appointed as Enquiry Officer under Rules 5 (4) of Police Disciplinary Rules 1975.
3. The Enquiry Officer shall conduct proceedings in accordance with provision of Efficiency Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record its findings and make within ten (10) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official under Efficiency Rules 1975.
4. The accused official shall join the proceeding on the date, time and place fixed by the Enquiry Officer.


(Muhammad irshad)
District Police Officer,
Buner

OFFICE OF THE DISTRICT POLICE OFFICER, BUNER

No. 6402-05 /Enquiry, Dated Daggar the 13/10 /2017
Copy of above is sent to:

1. Deputy Inspector General of Police, HQrs: Khyber Pakhtunkhwa Peshawar for favour of information, please.
2. The Enquiry Officer for initiating proceeding against the accused official namely Rajmalook under Efficiency Rules, 1975.
3. Concerned defaulter official through Head Clerk Investigation office.


ATTESTED

خدا - عالی

حوالہ خارج نیشنل عری 61 فورس 2017 19 10 صرف

خدمتوں کی کہ آج فورس 25 27 2017 بمبئی ایم صبی سرفید الرحمن نے خارج
نیشنل وصول کر کے ڈال کر دی ہے۔ یہ کہ سائل 1991 کا کھڑی شدہ
ہے اور دوران ڈیوٹی دفتر کے مختلف پراجیکٹوں پر خدمات انجام
دی ہیں۔ اسی دوران افغان بالہ (Asth-1-G.P) سے

کو سبھی نند جامع القامات بھی وصول کر کے ہیں۔ چونکہ میری
کارکردگی کی واضح ثبوت ہے۔ خدا - والد ابتدائی کھڑی سے لیکر
تا دم قریب اپنی ڈیوٹی ایما نڈارے۔ خوش السوی سے سہرا انجام
دیا جلد آ رہا ہوں۔ اسی دوران کھی بھی اپنے افغان بالہ

کو شکایت کا موقع نہیں دیا ہے۔ سائل کا تبادلہ صلح کو سب
کے الوشی لیشن دفتر سے 50 دنوں دفتر ٹیوا ہے۔ اذراں بالہ
کا حکم مقدم ہے۔ کنٹرول سائل سال 2016 سے مختلف نفسیاتی

وزیری بیماری کا شمار ہے۔ اور حوایے کے بڑے بڑے ماہر ڈاکٹروں
کا زیر علاج تھا اور زیر علاج ہے۔ یہ کہ سائل کو کوجہ شدید
ذہنی بیماری کے ڈاکٹر محمد طارق (شفیق سائیکھارک علیہ تاد)

2 10 17 سے 3 ہفتے مرڈیکل ریٹ دیا تھا سائل کی
حالت کو مددگار دفتر مزید ایک ماہ فورس 24 10 17 سے


مرڈیکل ریٹ عفا کی ہے۔ چونکہ گورنمنٹ ہسپتال برائے دفاعی اراضی
نہاں ہسپتال لک ہے۔ سائل نے بوقت دفتر تھا مرڈیکل
ریٹ جمع کر دی ہیں۔ جن کے تواریخ 2 10 17 اور 20 10 17 ہیں

ATTESTED

یہ کہ سائل محض بیماری ایوب سے تعلق سے حاضر ہے قاصر ہے اور مختلف اوقات میں مرض شدید تر ہونا چاہا ہے۔ سائل کے قبوری ایوب بیماری کو مد نظر رکھ کر حاجت مند سائل کرنے کے اوقات صدارت فرمائیں گا میں اور سائل کو مد نظر رکھ کر ایوب سے تعلق سے (مذکورہ اوقات پر توجہ فرمائیں)

العارض

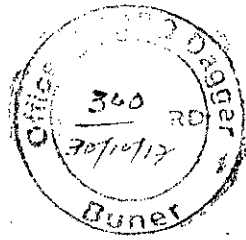
آکسٹینا بلج زرمال


 راجھلوک سنٹر چلک

حال مد نظر ایوب کو مد نظر

نورم 25-8-17


ATTESTED



14

ضلع بونیر

ازدفتہ SDPO ڈگر

فائنڈنگ رپورٹ

جناب عالی!

بحوالہ چارج شیٹ نمبر 61 مورخہ 19.10.2017 بجاریہ جناب DPO صاحب ضلع بونیر بعرض انکو آری موصول ہو کر سینئر کلرک راج ملوک کا تبادلہ ضلع ہذا سے ضلع بنوں ہو چکا ہے۔ مذکورہ کو بار بار مطلع کیا گیا کہ ضلع بنوں میں حاضری کر کے مگر مذکورہ آرڈر سے لیکر تاحال حاضری نہیں کی ہے۔

اندریں سلسلہ راج ملوک سینئر کلرک کو طلب کر کے بیان لیا گیا جس نے ظاہر کیا کہ دفتر INV بونیر میں تعینات ہوں چونکہ میں عرصہ دو سال سے مختلف ذہنی بیماریوں کا شکار ہوں اور صوبے کے مختلف دماغی ڈاکٹروں کے زیر علاج چلا آ رہا ہوں۔ میرے مرض کی شدت کی وجہ سے ڈاکٹر محمد طارق نے مجھے مورخہ 02.10.2017 سے تین ہفتے مکمل بیڈ ریٹ تحریر کیا تھا۔ دوبارہ معائنہ کرنے پر مورخہ 24.10.2017 کو ایک ماہ مکمل آرام کا مشورہ تحریر کیا ہے۔ ایسی دوران میرا تبادلہ ضلع ہذا سے ضلع بنوں ہو چکا ہے۔ میں نے بروقت ریٹ کے کاغذات دفتر INV ضلع بونیر ارسال کی ہے۔ اور میڈیکل ریٹ پر ہوں۔ (میڈیکل کاغذات اور بیان ہمراہ لف ہے)

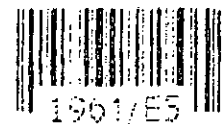
انکو آری ہو کر پایا گیا کہ واقعی راج ملوک سینئر کلرک گورنمنٹ سرحد ہسپتال پشاور سے دماغی علاج کر رہا ہے جبکہ علاج معالجہ کے کاغذات مورخہ 17.07.2017، 19.02.2017 کو معائنہ ڈاکٹر گوہر علی ساکائرسٹ نے کی ہے، ایسی طرح مورخہ 17.06.2017، 20.04.2017، 28.03.2017، 01.03.2017 کو ڈاکٹر جمال آرانے معائنہ کر کے ریٹ تحریر نہیں کی ہے۔ مگر مذکورہ کو تبادلہ ضلع ہذا سے ضلع بنوں مورخہ 28.09.2017 کو ہو چکا ہے۔ اور میڈیکل کاغذات میں بیڈ ریٹ مورخہ 02.10.2017 اور 24.10.2017 کو تحریر کی گئی ہے۔ جبکہ دیگر میڈیکل کاغذات میں ریٹ وغیرہ کا ذکر نہ ہے۔ یعنی میڈیکل ریٹ سے 4 یوم قبل مذکورہ کا آرڈر ضلع بنوں ہو چکا تھا۔ جسکو اطلاع دینے کے باوجود بھی حاضری نہیں کی ہے۔ اور عموماً ایسا خلاف توقع تبادلہ پر ایسا کیا جاتا ہے۔ حاضری کرنے اور وہاں سے بھی ریٹ یا میڈیکل لیو حاصل کیا جاسکتا تھا۔

لہذا رپورٹ بہر اد مناسب حکم پیش خدمت ہے
ایس۔ ڈی۔ پی۔ او سرحد ڈگر

Issue final
show cause notice

ATTESTED

15



From: - The Head of Investigation,
Buner

To: - The Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar

No. 1452 / EC, dated Daggar the 13 / 10 / 2017

Subject: - ORDER

Memo:

Kindly refer to your office Memo: No. 6148/E-V, dated:
09.10.2017.

In continuation of this office Memo No. 5168/GB, dated
02.10.2017, wherein the senior Clerk Raj Malook was directed to report his
new place of posting at DPC Office Bunnu. On the same day his relative
produced Medical document to this office duly 3 weeks Medical rest advised
by the Medical Officer, at the movement he has not been submitted his
departure so far.

Submitted, please.

HEAD OF INVESTIGATION,
BUNER

ATTESTED

16



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR

Ph: 091-9210543 Fax: 091-9210927
Email: OSEtabv@gmail.com

No. 6680 /E-V dated Peshawar the 02/11 /2017

To: The Head of Investigation,
Buner.


Subject: - ORDER.

Memo:-

Please refer to your office Memo: No. 1452/EC, dated 13.10.2017 on the subject noted above.

In this connection the remarks of Worthy DIG/HQrs CPO, Peshawar are reproduced below for further necessary actions.

☞ Please refer the case for Second Medical opinion, as per Rules. ☞


(Syed Zia Ali Shah)

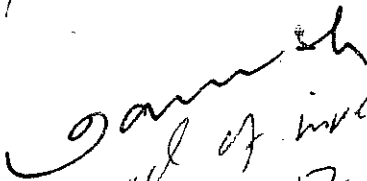
Registrar

For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

EC

For m/a.


ATTESTED


Head of inv. B: Buner
02-11-2017



15

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR

17

Ph: 091-9210545 Fax: 091-9210927
E-Mail: - OSEstcoV@gmail.com

NO. 7033-40 /E-V

Dated, Peshawar the 16-11 Nov, 2017

ORDER.

Consequent upon the non compliance of the transfer/posting order, issued vide this office No. 5827-35/E-V, dated 28.09.2017, Senior Clerk Raj Malook of Investigation Wing Buner is hereby placed under suspension and closed to CPO Peshawar with immediate effect.

Muhammad Ali Khan

MUHAMMAD ALI KHAN, PSP
DIG/HQrs:

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

16/11/17

Endst: No. & date even.

Copy forwarded to the: -

- Addl: Inspector General of Police HQrs: Khyber Pakhtunkhwa, Peshawar. *Regional Police Officer, Bannu.*
- Addl: Inspector General of Police Investigation Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police, HQrs, CPO Peshawar.
- PA to the Assistant Inspector General of Police: Esst: CPO Peshawar.
- SP/Investigation Wing, Buner w/r to his letter No. 1501/Invest: dated 09.10.2017 with the direction to submit detail report with finding of enquiry report conducted by the SDPO Daggar against Senior Clerk Raj Malook, as earlier requested, to this office for onward submission to the DIG/E & I, CPO Peshawar for further proceedings in the matter.
- Registrar CPO, Peshawar.
- Office Supdt: Secret CPO Peshawar.
- In-Charge Central Registry Cell CPO, Peshawar.

[Signature]
ATTESTED

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNHWA
CENTRAL POLICE OFFICE
PESHAWAR

Ph:-091-9210545 Fax:-091-9210927

Email:-OSEstabV@gmail.com

No.7033-40/E-V

Dated Peshawar the 16/11/Nov, 2017

ORDER

Consequent upon the non compliance of the transfer/posting order issued vide this office No.5827-35/E-V, dated 28.09.2017, Senior Clerk Raj Malook of investigation Wing Buner is hereby placed under suspension and closed to CPO Peshawar with immediate effect.

(Muhammad Ali Khan) PSP

DIG/HQrs:

For Inspector General of Police
Khyber Pakhtunkhwa
Peshawar

Endst No.& date even:-

Copy forwarded to the:-

1. Addl Inspector General of Police HQrs Khyber Pakhtunkhwa, Peshawar.
2. Regional Police officer, Bannu.
3. Addl Inspector General of police investigation Khyber Pakhtunkhwa, Peshawar.
4. Deputy Inspector General of Police, HQrs, CPO, Peshawar.
5. PA to the Assistant Inspector General of Police, Estt CPO Peshawar.
6. SP/Investigation Wing, Buner w/r to his letter No.1501/Invest: dated 09.10.2017 with the direction to submit detail report with finding of enquiry report conducted by the SDPO Daggar against Senior Clerk Raj Malook, as earlier requested to this office for onward submission to the DIG/E & 1, CPO Peshawar for further proceedings in the matter.
7. Registrar CPO, Peshawar.
8. Office Supdt: Secret CPO Peshawar.
9. Incharge General Registry Cell CPO, Peshawar

ATTACHED



(1)

OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA,
CENTRAL POLICE OFFICE,
PESHAWAR
Ph: 091-9210545 Fax: 091-9210927

(18)

CHARGE SHEET

I, MUHAMMAD ALI KHAN, DIG/HQrs CPO Peshawar as Competent Authority, under Rule 5(b) of Khyber Pakhtunkhwa, E & D Rules, 2011, hereby charge you Senior Clerk Raj Malook while posted at SP/Investigation Wing Buner as follows:-

i. That you was transferred from SP/Investigation Wing Buner and posted to DPO office Bannu vide this office Order No.5827-35/E-V, dated 28.09.2017 and the Head of Investigation Buner directed you several times to make departure and report to DPO Office Bannu for duty, as explained in his office letter No. 1501/Invest: dated 19.10.2017 but you deliberately did not obey the orders of the competent authority, which amounts to gross misconduct on your part and is punishable under the said Rules.

ii. All this speaks highly adverse on your part warranting stern disciplinary action against you under the relevant Rules, Khyber Pakhtunkhwa Government Civil Servants (Efficiency and Discipline) Rules-2011.

2. By reasons of the above, you appear to be guilty of misconduct under Rule 4 of Khyber Pakhtunkhwa Govt. Servants Efficiency and Discipline Rules 2011 and have rendered yourself liable to all or any of the penalties specified in the Rules ibid.

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

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

5. Intimate whether you desire to be heard in person.

6. A statement of allegations is enclosed.

MUHAMMAD ALI KHAN, PSP
DIG/HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

17/11/17

Received today
on 17/11/17

17/11/17



1

OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA,
CENTRAL POLICE OFFICE,
PESHAWAR

19

Ph: 091-9210545 Fax: 091-9210927

DISCIPLINARY ACTION.

I, MUHAMMAD ALI KHAN, DIG/HQrs CPO Peshawar, am of the opinion that Senior Clerk Raj Malook has rendered himself liable to be proceeded against departmentally, as he has committed the following acts within the meaning of Khyber Pakhtunkhwa Government Civil Servants (Efficiency and Disciplinary) Rules-2011.


STATEMENT OF ALLEGATIONS


- i) That he was transferred from SP/Investigation Wing Buner and posted to DPO office Bannu vide this office Order No. 5827-35/E-V, dated 28.09.2017 and the Head of Investigation Buner directed him several times to make departure and report to DPO Office Bannu for duty, as explained in his office letter No. 1501/Invest: dated 19.10.2017 but he deliberately did not obey the orders of the competent authority. Which amounts to gross misconduct on his part and is punishable under the said Rules.
 - ii) All this speaks highly adverse on his part warranting stern disciplinary action against him.
- 2). For the purpose of enquiry against the said official with the reference to the above allegation an Enquiry Officer/Enquiry Committee consisting of the following, is constituted under the rule 10 (1) (a) of the ibid rules.

Mr. Zahid Ullah, Director P.R.

Mr. Hukam Khan, DSP Internal Accountability

- 3). The Enquiry Officer/Enquiry Committee shall, in accordance with the provision of the said Rules, provide reasonable opportunity of hearing to the accused, record & submit its findings and make, within 30 days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.
- 4). The defaulter official and a well conversant representative of the department shall in the proceedings on the date, time and place fixed by the Enquiry Officer/Enquiry Committee.


MUHAMMAD ALI KHAN, PSP
DIG/HQrs:
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.


17/11/17.

Received to day
on 17/11/2017


17/11/2017


ATTACHED

To

The Deputy Inspector-General of Police,
Headquarters, KPK, Peshawar.

28

Subject:- Reply to the Charge Sheet and Statement of allegation

Respected sir,

I have been received charge sheet and statement of allegation regarding non-compliance of my transfer order from SP Office investigation Buner to DPO Office Bannu issued on 28-09-2017.

In this connection I submit my reply as follows:-

1. I have joined the Police department as Junior Clerk on 09-03-1991. During my service as Junior Clerk I have been granted commendation certificates by (Shaheed) Malik Muhammad Saad Khan the then AIG traffic and AIG General CPO, Peshawar (Copies Attached) for my good and efficient performances.
2. I was promoted as Senior Clerk on 01-09-2015. ✓
3. I am suffering from mental disease from the dates as noted below:-
 - a. Remained under treatment of Dr. Gohar Ali Daggar Buner on 17-07-2016.
 - b. Remained under treatment of Dr. Gohar Ali Daggar Buner from 19-02-2017.
 - c. Govt Sarhad Hospital for Psychiatric Diseases Peshawar from 01-03-2017.
 - d. Govt Sarhad Hospital for Psychiatric Diseases Peshawar from 28-03-2017.
 - e. Govt Sarhad Hospital for Psychiatric Diseases Peshawar from 20-04-2017.
 - f. Shafique Psychiatric Clinic (Dr. Muhammad Tariq) Peshawar from 12-05-2017.
 - g. Govt Sarhad Hospital for Psychiatric Diseases Peshawar from 17-07-2017.
 - h. Shafique Psychiatric Clinic (Dr. Muhammad Tariq) Peshawar from 29-09-2017. (Advised bed rest for three weeks with effect from 02-10-2017.
 - i. Govt Sarhad Hospital for Psychiatric Diseases Peshawar on 18-10-2017 (Advised bed rest for one month with effect from 24-10-2017.
 - j. Remained under treatment KTH Peshawar on 17-11-2017.
 - k. Govt Sarhad Hospital for Psychiatric Diseases Peshawar on 20-11-2017 (Advised bed rest for one month with effect from 23-11-2017.(Photo copies of the above medical certificates are attached).

ATTESTED

21

4. Due to my mental disease I cannot proceed to Bannu as I am still suffering from the same disease and under treatment of Psychiatric Specialist at Peshawar.

I am a low paid employee and cannot afford such expenses because my 07 children are studying in various schools at Buner District.

It is therefore requested that the authority may please be recommended to cancel my transfer order from Buner to Bannu District on compassionate grounds and obliged.

Thanks

Dated: 27/11/2017

Your's Obediently,



(Raj Malook)

Senior Clerk

Now on Medical Leave




ATTESTED

22

TO WHOM IT MAY CONCERN.

This is to certify that Mr. RAJ MALOOK S/O TAJ MALOOK resident of village Bajkata, Tehsil Gagra Police Station Daggar, District Buner, NWFP has been serving in the Police Department since March 1991. He has gained rich experience in official work including typing and file work. He is a diligent, obedient, trustworthy and a responsible official. During his service in this Department he has been very polite and cooperative in his attitude towards his colleagues and Superiors. We wish him a bright career and a prosperous future.


(MALIK MOHAMMAD SAAD KHAN)
Asstt: Inspector General of Police,
General, NWFP, Peshawar.

Asstt: Inspector General of Police
(General) N.W.F.P. Peshawar

No. 268 /PA,

Dated 23/11 /2000.


ATTESTED

(23)

North West Frontier Province Police



Commendation Certificate

CLASS III

Granted by

MALAK MOHAMMAD SAAD KHAN.

Asstt: Inspector General of Police, Traffic N.W.F.P. Peshawar.

To RAJ MALOOK.

Son of TAJ MALOOK.

District BUNER

in Recognition of

HIS GOOD CO-OPERATION WITH THE TRAFFIC POLICE


ATTACHED

CASH REWARD OF RS500/-

(Five Hundred only)

O.B. No. 98

Dated...27/6/19 98


Asstt Inspector General of Police
Traffic N.W.F.P. Peshawar.



GOVT: SARHAD HOSPITAL
FOR PSYCHIATRIC DISEASES
PESHAWAR

گورنمنٹ ہسپتال برائے دماغی امراض پشاور

(24)
ادنی ڈی بی
RS:10

Name _____
Disease _____ Date 20 NOV 2017
Unit No. _____ Year No. 36871

Indial
10
100
100
C. Nutrese 15

Mr Raj Malosh Suffer from
Chronic Depressive Disorder. He has
already been treated by other Psychiatrists
as well. He is advised to consult opinion
from other Psychiatrists of UTH/KTH. At
the moment he is not well & recommended
medical leave for one month by 23/11/2017

ڈاکٹر کے مشورے کے بغیر دوائی بند نہ کریں۔

Dr. Mohammad Tariq
Consultant Psychiatrist

ATTESTED

KTH, Khyber Teaching Hospital Peshawar

University Road, Peshawar. Phone: +92-91-9224400, Fax: --
Email: info@kth.gov.pk, Website: http://www.kth.gov.pk

OPD SLIP

25

PSYCHIATRY - OPD Token# N/A

OPD No :		Serial # :	878754
M.R. No :	K0300000887577	Invoice # :	K03171081391
Name :	RAJ MALOOK	Receipt # :	K03170970222
Gender :	Male	Amount Paid :	10.00
Age :	50 Year(s)	Date :	17-NOV-17

3

History

Follow up

Clinical Examination

Rx

Tub Swift 1007 - 0.6

Provisional Diagnosis

1 + 1
1 - 1

Investigations

Tub Individual 0.4
1 - 1 1 - 1

Tub Noture, 5, 7, 0.6
5 2, 2, 0

ATTESTED



GOVT. SARHAD HOSPITAL
FOR PSYCHIATRIC DISEASES
PESHAWAR

گورنمنٹ ہسپتال برائے دماغی امراض پشاور

26

ادنی ڈی آر جی
RS:10

Name _____ Date 18 OCT 2017
Disease _____ Year No 33166
Unit No. _____

Inderal
400

1 P 1

Scipt 1000

1 P 1

W.C

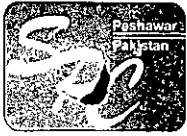
Notense 15

Raj Malhotra suffers from Resistant Depression
He is not responding to treatment. Needs
Opinion from other Psychiatrist. It is
Recommended he may be granted
medical leave for one month w.e.f 24/10/2017
for the time being.

ڈاکٹر کے مشورے کے بغیر دوائی بند نہ کریں۔

M. Ahmad
Dr. Muhammad T. M.
Consultant Psychiatrist
Govt. Sarhad Hospital for
Psychiatric Diseases
Peshawar.

ATTESTED



Shafique Psychiatric Clinic
Psychotherapy Clinic
Inpatient Ward

Shafique Psychiatric Clinic

Jamrud Road, Tehkal Bala
Peshawar 25140
Pakistan.

27

PROF. DR. M SHAFIQUE
M.B.B.S (Pb): D.P.M.(Eng)
F.R.C.Psych (UK)

NAME: Raj Malook.

DATE: 29/9/2017

DR. JAMAL ARA
M.B.B.S (Pb)

DR. MUHAMMAD TARIQ
M.B.B.S (KMC Pesh)
M.C.P.S. (Psych)

DR. FUAD KHAN
M.B.B.S (KMC Pesh)
M.D. (USA)
Diplomate American Board
of Psychiatry and Neurology
Fellow: Psychoanalytic Psychotherapy
Harvard, Boston, USA

پروفیسر ڈاکٹر محمد شفیق
ڈی۔ پی۔ ایم۔ (لندن)
ایف۔ آر۔ سی۔ سائیک (انگلینڈ)

ڈاکٹر جمال آرا
ایم۔ بی۔ بی۔ ایس۔ (پنجاب)

ڈاکٹر محمد طارق
ایم۔ بی۔ بی۔ ایس۔ (پشاور)
ایم۔ سی۔ پی۔ ایس۔ (سائیک)

ڈاکٹر فواد خان
ایم۔ بی۔ بی۔ ایس۔ ایم ڈی

ڈیپلومیٹ امریکن بورڈ آف سائیک لری اینڈ نیورالوجی،
نیواڈا دس سائیکوٹرا، پیوڈیو نیورس، (امریکہ)

**MEDICAL SPECIALIST
& PSYCHIATRIST**

DR. SADIA SHAFIQUE
M.B.B.S.(KMC-Pesh)
M.R.C.P. (UK)
M.C.P.S. (Psych)

ڈاکٹر سعیدہ شفیق
ایم۔ بی۔ بی۔ ایس۔ (پشاور)
ایم۔ سی۔ پی۔ ایس۔ (انگلینڈ)
ایم۔ سی۔ پی۔ ایس۔ (سائیک)

Not valid For Court
or Legal Purpose

Tel: (091) 5840423
Fax: (091) 5844728



Web: www.shafique.org
Email: mail@shafique.org

Handwritten notes:
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جاری 1 1 1
= 8
Notense is
جاری 1 1 1
= 8

DR. MUHAMMAD TARIQ
Consultant Psychiatrist
Govt. Sardaar Ghouse Hospital
Peshawar. Ph: 9210390/460

*Recommended medical leave
and Complete bed rest for
03 weeks wef 2.10.2017. This leave is
essential for his health.*

Signature of Dr. Muhammad Tariq

DR. MUHAMMAD TARIQ
Consultant Psychiatrist
Govt. Sardaar Ghouse Hospital
Peshawar. Ph: 9210390/460

چھٹی: بروز ہفتہ اور اتوار۔
دوبارہ معائنہ:
آنے سے پہلے ٹیلی فون کریں (091) 5840423
دوا کسی بھی صورت میں ڈاکٹر کی ہدایت کے
بغیر نہ چھوڑیں۔

ATTESTED



GOVT. SARHAD HOSPITAL
FOR PSYCHIATRIC DISEASES
PESHAWAR

گورنمنٹ ہسپتال برائے دماغی امراض پشاور

اورا ڈی پرچی
 RS:10

28

me _____

isease _____ Date 17 JUL 2017

it No. _____ Year No. 22626

21/ ملوگر
 کاپی

Can't free them
 Can't do for war

① Indoval 40
 1 x 1

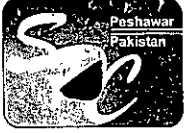
② Serop 50
 1/2 x 1/2 - 206

1 x 1
 1 x 1

③ Notense 15

ڈاکٹر کے مشورے کے بغیر دوائی بند نہ کریں


ATTESTE



Shafique Psychiatric Clinic
Psychotherapy Clinic
Inpatient Ward

Shafique Psychiatric Clinic

Jamrud Road, Tehkal Bala
Peshawar 25140
Pakistan.

(29)

PROF. DR. M SHAFIQUE
M.B.B.S (Pb); D.P.M.(Eng)
F.R.C.Psych (UK)

NAME: Raj Malook ki

DATE: 12 MAY 2016

DR. JAMAL ARA
M.B.B.S (Pb)

DR. MUHAMMAD TARIQ
M.B.B.S (KMC Pesh)
M.C.P.S. (Psych)

DR. FUAD KHAN
M.B.B.S (KMC Pesh)
M.D. (USA)
Diplomate American Board
of Psychiatry and Neurology
Fellow: Psychoanalytic Psychotherapy
Harvard, Boston, USA

پروفیسر ڈاکٹر محمد شفیق
ڈی۔ پی۔ ایم۔ (لندن)
ایف۔ آر۔ سی۔ سائیک (انگلینڈ)

ڈاکٹر جمال آرا
ایم۔ پی۔ بی۔ ایس۔ (پشاور)

ڈاکٹر محمد طارق
ایم۔ پی۔ بی۔ ایس۔ (پشاور)
ایم۔ سی۔ پی۔ ایس۔ (سائیک)

ڈاکٹر فواد خان
ایم۔ پی۔ بی۔ ایس۔ ایم ڈی،
ڈپلومیٹ امریکن بورڈ آف سائیکیاٹری اینڈ نیورالوجی،
فلوئیڈا ایس سائیکوٹھراپی، ہارورڈ یونیورسٹی، (امریکہ)

Raj Malook ki
Raj Malook
Indral 40
101
جاری

Seokat CR
25

جاری

Nassa/Ramagos
15 P

جاری

**MEDICAL SPECIALIST
& PSYCHIATRIST**

DR. SADIYA SHAFIQUE
M.B.B.S.(KMC-Pesh)
M.R.C.P. (UK)
M.C.P.S. (Psych)

ڈاکٹر سادیہ شفیق
ایم۔ پی۔ بی۔ ایس۔ (پشاور)
ایم۔ آر۔ سی۔ پی۔ (انگلینڈ)
ایم۔ سی۔ پی۔ ایس۔ (سائیک)

Sadiya Shafique

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or Legal Purpose

Tel: (091) 5840423
Fax: (091) 5844728

Web: www.shafique.org
Email: mall@shafique.org

آئرنڈر

Zolp/Sleepol

چھٹی بروز ہفتہ اور اتوار۔
دوبارہ معائنہ:
آنے سے پہلے ٹیلی فون کریں (091) 5840423
دوا کسی بھی صورت میں ڈاکٹر کی ہدایت کے
بغیر نہ چھوڑیں۔

[Signature]
ATTESTED



GOVT: SARHAD HOSPITAL
FOR PSYCHIATRIC DISEASES
PESHAWAR

گورنمنٹ ہسپتال برائے نفسیاتی امراض پشاور

31

اوپن ڈی پرچی
RS:3.00

Name علی محمد Date 28 MAR 2017

Disease _____ Date _____

Unit No. _____ Year No 10614

Manic / Depression

no sed

Toflomil - 257

1/2 + 1/2 + 1

Prexar / Hapicite
1/2

ڈاکٹر کے مشورے کے بغیر دوائی بند نہ کریں۔

Tarfar

[Signature]
ATTESTED



GOVT: SARHAD HOSPITAL
FOR PSYCHIATRIC DISEASES
PESHAWAR

گورنمنٹ ہسپتال برائے ذہنی امراض پشاور

32

ادبی ڈی پرچی
RS:3.00

ame _____

isease _____ Date 01 MAR 2017

nit No. _____ Year No 7189

Mudon/Dej

(I) Relmie 50P
1 P 1

(II) Joderal 10P
1 P 1 P 1

(III) Notense 15

✓

ڈاکٹر کے مشورے کے بغیر دوائی بند نہ کریں۔

ATTESTED