

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Appeal No. 1238/2014

Date of Institution ... 29.09.2014

Date of Decision ... 11.12.2017

Amal Khan, Ex-Constable No. 671 R/O Mohallah jogikhel, Village and Post Office,
Sangar, Tehsil and District, Mardan. ... (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home & Tribal Affairs
Peshawar. ... (Respondents)

MR. MUHAMMAD AYUB KHAN SHINWARI, ... For appellant
Advocate

MR. RIAZ AHMAD PAINDA KHEL,
Assistant Adv. General ... For respondents.

MR. NIAZ MUHAMMAD KHAN, ... CHAIRMAN
MR. MUHAMMAD AMIN KHAN KUNDI, ... MEMBER

JUDGMENT

NIAZ MUIHAMMAD KHAN, CHAIRMAN.- Arguments of the learned
counsel for the parties heard and record perused.

FACTS

2. The appellant was dismissed from service on 27.05.2014 due to absence
from duty. Against which he filed departmental appeal on 09.06.2014 which was
rejected on 04.08.2014 and then he filed the present service appeal on 29.09.2014.

ARGUMENTS.

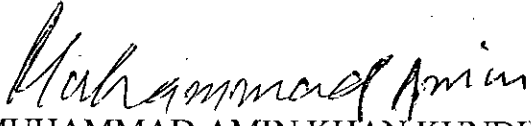
3. The learned counsel for the appellant argued that the very absence which was made the basis for departmental proceedings has been legalized by converting the same into leave without pay. That such order cannot be sustained in the eyes of law.

4. On the other hand, the learned Assistant Advocate General argued that the appellant was willfully absent from duty. That he did not take prior sanction of leave. That the whole proceedings are in accordance with law.

CONCLUSION.

5. Without adverting to the merits of the case, the very order converting the absence into leave has legalized the absence. This Tribunal in so many judgments has set aside such orders being void on the basis of judgment of the august Supreme Court of Pakistan reported as 2006-SCMR-434.

6. In view of the above discussion, this appeal is accepted and appellant is reinstated in service. The intervening period may be treated as leave of the kind due. Parties are left to bear their own costs. File be consigned to the record room.



(MUHAMMAD AMIN KHAN KUNDI)
MEMBER



(NIAZ MUHAMMAD KHAN)
CHAIRMAN

ANNOUNCED
11.12.2017

12.06.2017

Clerk of the counsel for appellant and Mr. Atta-Ur-Rahman, ASI alongwith Mr. Muhammad Adeel Butt, Additional AG for the respondents present. Clerk of the counsel for appellant Requested for adjournment. Adjourned. To come up for arguments on 22.09.2017 before D.B.


(Muhammad Amin Khan Kundi)
Member


(Gul Zeb Khan)
Member

25/09/2017

Since ~~07~~ 22.09.2017 has been declared as a public holiday on account of first Muharram. Therefore cases adjourned to 11.12.2017 for the same.


READER

11.12.2017

Counsel for the appellant and Mr. Riaz Ahmad Painsa, Khel, Asstt. A.G alongwith Attaur Rahman, S:I(Legal) for respondents present. Arguments heard and record perused.

This appeal is accepted as per our detailed judgment of today. Parties are left to bear their own costs. File be consigned to the record room.

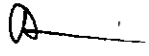

MEMBER


CHAIRMAN

ANNOUNCED
11.12.2017

11.08.2016

Appellant in person and Mr. Muhammad Ghani, S.I alongwith Additional AG for respondents present. Due to general strike of the Bar learned counsel for the appellant is not in attendance today before the Court, therefore, case is adjourned for arguments to 15-11-16 before D.B.


Member


Member

15.11.2016

Counsel for the appellant and Assistant AG for respondents present. Learned Assistant AG requested for adjournment. To come up for arguments on 13.03.2017 before D.B.



Member


Chairman

13.03.2017

Appellant with counsel and Mr. Khalid Mehmood, H.C alongwith Mr. Muhammad Jan, Government Pleader for respondents present. Learned counsel for appellant requested for adjournment. Adjournment granted. To come up for arguments on 12.06.2017 before D.B.



MEMBER


(ASHFAQUE TAJ)
MEMBER

05.11.2015

Counsel for the appellant and Mr. Muhammad Ghani, S.I
alongwith Mr. Ziaullah, GP for respondents present. Due to paucity of
time therefore, arguments could not be heard. To come up for
arguments on 17-3-2016.


Member


Member

17.03.2016

Appellant in person and Mr. Muhammad Ghani, SI (Legal)
alongwith Mr. Muhammad Jan, GP for respondents present. Since
the court time is over, therefore, the case is adjourned to
18.5.16 for arguments.


Member


Member

18.5.2016

Appellant in person and Mr. Usmnan Ghani, Sr. GP for
respondents present. Appellant in person requested for adjournment.
Adjourned for arguments to 11.8.2016.


Member


Member

Appeal No. 1238/2014
Mr. Amal Khan.

3

Reader Note:

29.12.2014

Clerk of counsel for the appellant present. Since the Tribunal is incomplete, therefore, case is adjourned to 02.03.2015 for the same.


Reader

02.03.2015

Counsel for the appellant and Asst: AG for the respondents present. Preliminary arguments heard and case file perused. Through the instant appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, the appellant has impugned order dated 27.05.2014, vide which the major penalty of dismissal from service has been imposed upon the appellant. Against the above referred impugned order appellant filed departmental appeal on 09.06.2014, which was rejected on 04.08.2014 and hence the instant appeal on 29.09.2014. He further contended that neither any charge sheet, statement of allegation has been issued nor any proper enquiry has been conducted against the appellant.


Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. To come up for written reply/comments on 28.04.2015.


Member

28.04.2015



Appellant in person and Muhammad Ghani, S.I along with Mr. Ziaullah, GP for the respondents present. *written reply* submitted. The appeal is assigned to D.B for rejoinder and final hearing on 05.11.2015 before D.B.


Member

Appellant deposit process fee & security


Form- A
FORM OF ORDER SHEET

Court of _____
Case No. 1238/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	15/10/2014	<p>The appeal of Mr. Amal Khan resubmitted today by Mr. Muhammad Ayub Shinwari Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	21-10-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>29-12-2014</u></p> <p style="text-align: right;"> CHAIRMAN</p>

ORDER

Constable Aimal Khan No. 671, while posted at Police Station Saro Shah Mardan committed the following acts, which leads to gross misconduct on his part as defined in Rules 02 (iii) of Police Rules 1975. Brief facts are that Constable Aimal Khan No. 671, while he was posted at Police Station Saro Shah Mardan deliberately absented yourself from the lawful duty without prior permission/leave from his superiors vide DD No.27, dated 01.03.2014 uptill now.


In this connection, Constable Aimal Khan No. 671, was charge sheeted vide this office No. 560/R, date 08.04.2014 and he was also proceeded against departmentally through inquiry officer, Mr: Hayatullah Khan Inspector/RI Police Lines Mardan who after fulfilling necessary process, submitted his findings to the undersigned vide his office endorsement No. 220/RI: dated 26.05.2014, in which the allegations has been established against the defaulter constable.

The undersigned agree with the findings of enquiry officer and the alleged Constable Aimal Khan No. 671, is hereby dismissed from service and his absence period counted as leave without pay, in exercise of the power vested in me under the above quoted rules.

Order announced

O.B No. 1229

Dated 27 / 05 / 2014


(Gul Afzal Afridi)
District Police Officer,
Mardan.

No. 5931-361 dated Mardan the 27.5 /2014

Copy for information and necessary action to:-


1. The Deputy Inspector General of Police Mardan Region-1
2. The S.P Operations, Mardan.
3. The DSP/HQrs Mardan.
4. The Pay Officer (DPO) Mardan.
5. The E.C (DPO) Mardan.
6. The OASI (DPO) Mardan.

The appeal of Mr. Amal Khan Ex-Constable No. 671 Distt. Police Mardan received today i.e. on 29.09.2014 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- 2- Copy of Impugned dismissal order dated 27.5.2014 mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 3- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 4- Heading of the appeal is incomplete which may be completed.
- 5- Six more copies/sets of the appeal along with annexures i.e complete in all respect may also be submitted with the appeal.

No. 1438 /S.T,

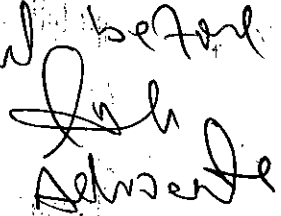
Dt. 29/9 /2014.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. M. Ayub Khan Shinwari Adv. Pesh.

Sir,

- 1) No regular inquiry is held, therefore no charge sheet, statement of allegations, show cause notice, inquiry report and replies to it are given, hence the same could not be attached.
- 2) Copy of impugned dismissal order dated 27-05-14 is not available, the appellant has approached the respondents to get its copy but in vain. However the order dated 27-05-14 is discussed in order dated 04-08-14 which is on file.
- 3) Copy of Deptt Appeal is attached.
- 4) Heading of Appeal is complete so the case may be placed before the Tribunal.


Advocate

In the Khyber Pakhtunkhwa Service Tribunal Peshawar

Service Appeal No. 1938 /2014

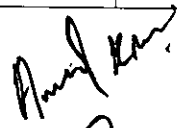
Amal Khan

Versus

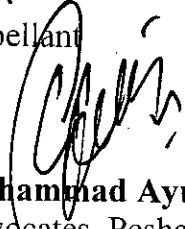
Govt. of KP through Secty Home & Trial Affairs & others

INDEX

S. #	Description of documents.	Annexure	Pages
1.	Service Appeal		1-3
2.	Affidavit		4
3.	Copy of order		5
4.	Copy of departmental appeal		6
5.	Wakalatnama		7


Appellant

Through :


Muhammad Ayub Khan Shinwari

Advocates, Peshawar

Chamber:

7- A & 11-A Haroon Mansion

Khyber Bazar, Peshawar.

Cell: 0321-9068514

Dated:

In The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No 1238 /2014

Amal Khan,
Ex Constable, No 671
R/o Mohallah Jogikhel, Village and P.O Sangao,
Tehsil Katlang, District Mardan.

1226
29-9-2014

....Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Secretary Home and Tribal Affairs, Peshawar
2. Inspector General of Police, Government of Khyber Pakhtunkhwa, Peshawar
3. Deputy Inspector General of Police, Mardan Region-I, Mardan
4. District Police Officer, Mardan

....Respondents

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 04-08-2014.

Prayer:

on acceptance of this Service Appeal the impugned order dated 27-05-2014 whereby a major penalty of Dismissal from Service is imposed upon the Appellant and the Office Order dated 04-08-2014 whereby Departmental Appeal of the Appellant is dismissed be set aside and the respondents may kindly be directed to reinstate the Appellant in service with all back benefits.

Respectfully Sheweth,

Brief but relevant facts of the case are as follows:

ac-submitted to the Tribunal that the Appellant was appointed as constable in the respondent Department and filed. 04-04-2011, ever since his appointment, the Appellant has performed his duties

29/9/14
15/10/14

to entire satisfaction of his superiors without any complaint from any quarter concerned.

2. That the Appellant was dismissed from service vide order dated 27-05-2014.
3. That it is pertinent to mention here that the aforesaid Office Order whereby a major penalty of Dismissal from Service is imposed on the Appellant is passed without holding any inquiry, without giving any show cause Notice, without giving any chance of hearing to the Appellant, without giving any final show cause Notice to the Appellant, without recording any evidence and in utter disregard of the mandatory provisions of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.
4. That against the aforesaid Office Order the Appellant filed a Departmental Appeal on 04-06-2014, which was dismissed vide Order dated 04-08-2014, the copy of the said order is received by the Appellant on 30-04-2014.

Hence this Service Appeal on the following amongst other grounds:

Grounds:

- a. That the impugned order is against the law, illegal, unlawful, without lawful authority and void ab-initio, thus liable to be set aside.
- b. That the treatment met to the Appellant is against the law, rules and policy which is against the Article 4 of the Constitution of Islamic Republic of Pakistan, 1973.
- c. That the impugned Order whereby a major penalty of Dismissal from Service is imposed on the Appellant is passed without holding any inquiry, without giving any show cause Notice, without giving any chance of hearing to the Appellant, without giving any final show cause Notice to the Appellant, without recording any evidence and in utter disregard of the mandatory provisions of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and Police Rules.
- d. That the impugned order whereby a major penalty of Dismissal from Service imposed on the Appellant is against the principles of natural justice as the Appellant is condemned unheard and it is a well settled principle of law that any order which violate the principle of *audi alteram partem* is nullity in the eye of law.
- e. That the impugned order is against the dictums of the August Supreme Court of Pakistan.
- f. That the impugned Order whereby a major penalty of Dismissal from Service is imposed upon the Appellant is *coram non judice*, based on malafide for extraneous considerations and is a result of colorful exercise of powers which is not permissible under the law.


31
g. That the Appellant craves permission of this Honorable Tribunal to rely on other grounds at the time of arguments and produce any additional document if required in support of his Petition.

It is, therefore, prayed that on acceptance of this Service Appeal the impugned order dated 27-05-2014 whereby a major penalty of Dismissal from Service is imposed upon the Appellant and the Office Order dated 04-08-2014 whereby Departmental Appeal of the Appellant is dismissed be set aside and the respondents may kindly be directed to reinstate the Appellant in service with all back benefits.

Any other relief which has not been specifically prayed for and deemed fit and appropriate by this Honorable Tribunal in the circumstances may graciously be granted.

Through


Appellant,


Muhammad Ayub Khan Shinwari
Advocate Peshawar

In The Khyber Pakhtunkhwa Service Tribunal, Peshawar

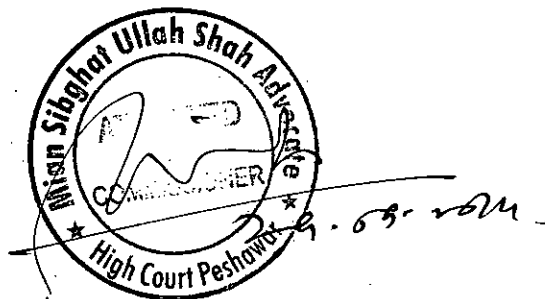
Service Appeal No _____/2014

Amal Khan Versus Govt of KP through Secty.Home & Tribal Affairs & Others

Affidavit

I, Amal Khan, Ex Constable, No 671, R/o Mohallah Jogikhel, Village and P.O Sangao, Tehsil Katlang, District Mardan do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Amal Khan
Deponent



ORDER.

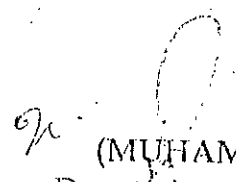
5

This order will dispose-off the appeal preferred by Ex-Constable Amal Khan No. 671 of Mardan District Police against the order of District Police Officer, Mardan, wherein he was dismissed from service vide District Police Officer, Mardan OB: No. 1229 dated 27.05.2014.

Brief facts of the case are that he while posted at Police Station Saro Shah deliberately absented himself from the lawful duty without prior permission/leave from his superior, vide daily dairy No. 27 dated 01.03.2014 to the date of dismissal. In this connection he was charge sheeted and also proceeded against departmentally through inquiry Officer, who after fulfilling necessary process, submitted his findings to District Police Officer, Mardan, which the allegations were established against him. Therefore he was dismissed from service.

I have perused the record and also heard the appellant in Orderly Room held in this office on 23.07.2014. He failed to justify his absence period and could not advance any cogent reason in his defence. Therefore, I MUHAMMAD SAEED Deputy Inspector General of Police, Mardan Region-I, Mardan in exercise of the powers conferred upon me reject the appeal, not interfere in the order passed by the competent authority, thus the appeal is filed.

ORDER ANNOUNCED.

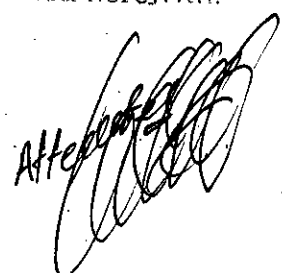

(MUHAMMAD SAEED)PSP
Deputy Inspector General of Police,
Mardan Region-I, Mardan.

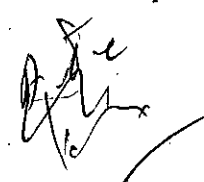
No. 5078 /ES, Dated Mardan the 04/08 /2014.

Copy to District Police Officer, Mardan for information and necessary action w/r to his office Memo: No. 607/LB dated 24.06.2014.

His service Roll is returned herewith.

(*****)

Attended 



کفر و کفر - چیز و چیز

روز است بیکر و بیکر کربن صبا در باره لجال کربن صبا

عنا چال با

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

4/241
شخصی و نامی ... مسائل ... کربن صبا

... مسائل ... کربن صبا ...

... کربن صبا ...

... کربن صبا ...

... کربن صبا ...

... کربن صبا ...

... کربن صبا ...

... کربن صبا ...

9/2014

Attended

... کربن صبا ...

بعد الت فیاب مسرور سسر مر بیو بل لکھنؤ

2014ء منجانب اپنا لکھنؤ
بنام "موسس" و فیو

محل خان

29/9/14	مورخ
JENICE	مقدمہ
APPEAL	دعوی
/	جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام مسرور سسر مر بیو بل لکھنؤ کیلئے محترم عیوب خان و بیو لکھنؤ لکھنؤ سے مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کہ مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک درو پیہ ا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق ذرا میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکورہ کریں۔ لہذا وکالت نامہ لکھنؤ یا کہ سندر ہے۔

2014
Advocate
Accurat
Advocate

المرقوم 9/10/14

عجل خان

APPELLANT

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Service Appeal No. 1238/2014

Amal Khan Ex-constable No. 671, District Mardan.....Appellant.

VERSUS.

1. Govt: of Khyber Pakhtunkhwa through Secretary Home and Tribal Affairs, Peshawar.
2. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
3. Deputy Inspector General of Police, Mardan Region-I, Mardan
4. District Police Officer, Mardan.....Respondents.

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:-

1. That the appellant has not come to this Honourable Tribunal with clean hands.
2. That the appellant has got no cause of action.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct, by law to bring the instant appeal.
5. That the present appeal is bad in its present form hence not maintainable and liable to be dismissed.
6. That the appeal is bad due to non-joinder and mis-joinder of unnecessary parties.
7. That the instant appeal is barred by law.

REPLY ON FACTS:-

1. Pertains to record: Hence, no comments.
2. Pertains to record, hence, no comments.
3. Incorrect. The punishment has been awarded after proper departmental inquiry through Reserved Inspector Police Lines Mardan as Inquiry Officer. In this regard all codal formalities has been complied with and the appellant was issued charge sheet No. 560/R/DA/PR, 1975 dated 08.04.2014 to which his reply was due within stipulated time of one month, but the appellant did not bother even to submit his reply before the competent authority. **(Copies of Charge Sheet, Statement of allegation and enquiry report are attached as Annexure A, B & C)**
4. Correct. The appellants' departmental appeal was dismissed while personally heard in orderly room, for lack of convincing reasons in his defence, by the departmental appellate authority.

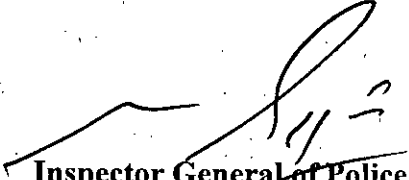
REPLY ON GROUNDS:-

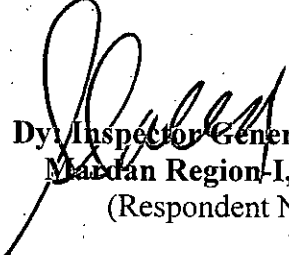
- A. Incorrect. The impugned orders are in accordance with law and liable to be maintained.
- B. Incorrect. The appellant has been treated according to law, rules and policy and there is no violation of Article- 4 of the constitution of Islamic Republic of Pakistan.
- C. Incorrect. This Para is already replied properly in Para-3 above.
- D. Incorrect. The impugned orders passed are in accordance with the principles of natural justice. Further, the appellant was heard by the Departmental Appellate Authority but he could not present cogent reasons in his defence.

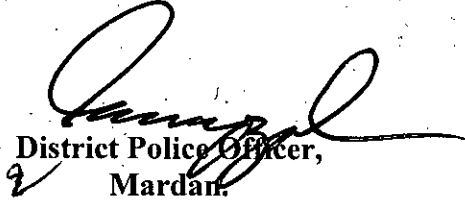
- E. Incorrect. The impugned order is according to law and rules.
- F. Incorrect. There is no malafide on the part of respondents and the appellant is punished to under law, for the misconduct he committed.
- G. The respondents also seek permission of the Hon'able Tribunal to present further grounds at the time of arguments.

PRAYER:-

The appeal of the appellant, being devoid of merit and baseless, is liable to be dismissed with cost.


**Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.**
(Respondent No. 2)


**Dy. Inspector General of Police,
Mardan Region-I, Mardan.**
(Respondent No. 3)


**District Police Officer,
Mardan.**
(Respondent No. 4)

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Service Appeal No. 1238/2015

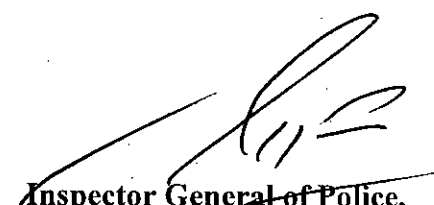
Amal Khan Ex-constable No. 671, District Mardan.....Appellant.

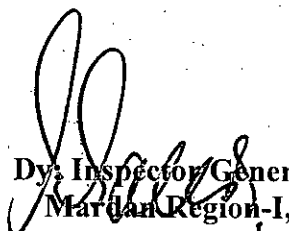
VERSUS.

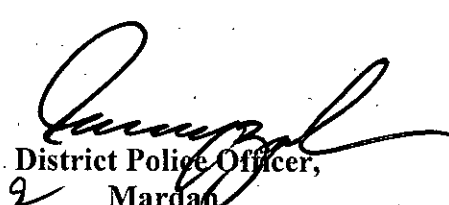
1. Govt: of Khyber Pakhtunkhwa through Secretary Home and Tribal Affairs, Peshawar.
2. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
3. Deputy Inspector General of Police, Mardan Region-I, Mardan
4. District Police Officer, Mardan.....Respondents.

COUNTER AFFIDAVIT.

We, the respondents do hereby declare and solemnly affirm on oath that the contents of the Para-wise comments in the service appeal cited as subject are true and correct to the best of our knowledge and belief and nothing has been concealed from this Honourable Tribunal.


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 2)


Dy. Inspector General of Police,
Mardan Region-I, Mardan.
(Respondent No. 3)


District Police Officer,
Mardan
(Respondent No. 4)

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Service Appeal No. 1238/2015

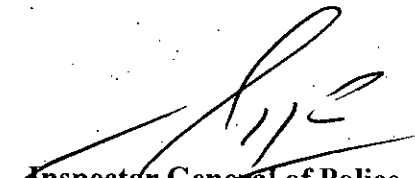
Amal Khan Ex-constable No. 671, District Mardan.....Appellant.


VERSUS.

1. Govt: of Khyber Pakhtunkhwa through Secretary Home and Tribal Affairs, Peshawar.
2. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
3. Deputy Inspector General of Police, Mardan Region-I, Mardan
4. District Police Officer, Mardan.....Respondents.

AUTHORITY LETTER.

Mr. Muhammad Shafiq Inspector Legal, (Police) Mardan is hereby authorized to appear before the Honourable Service Tribunal, Khyber Pakhtunkhwa, Peshawar in the above captioned service appeal on behalf of the respondents. He is also authorized to submit all required documents and replies etc. as representative of the respondents through the Addl: Advocate General/Govt. Pleader, Khyber Pakhtunkhwa Service Tribunal, Peshawar.


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 2)


Dy: Inspector General of Police,
Mardan Region-I, Mardan.
(Respondent No. 3)


District Police Officer,
Mardan.
(Respondent No. 4)

C A 27

CHARGE SHEET UNDER NWFP POLICE RULES 1975

I, **Gul Afzal Khan** District Police Officer, Mardan as competent authority hereby charge you **Constable Aimal No.671**, as follows.

That you **Constable**, while posted at Police Station Saro Shah, deliberately absented himself from the lawful duty vide DD No. 27 dated 03.03.14 to-date. You are recommended for departmental proceedings by DSP/TSS vide his office letter No.R-74/TBI dated 20.03.2014.

This amounts to grave misconduct on your part, warranting departmental action against you, as defined in section - 6 (1) (a) of the NWFP Police Rules 1975.

1. By reason of the above, you appear to be guilty of misconduct under section - 02 (iii) of the NWFP Police Rules 1975 and has rendered yourself liable to all or any of the penalties as specified in section - 04 (i) a & b of the said Rules.
2. You are therefore, directed to submit your written defense **within seven days** of the receipt of this charge sheet to the enquiry officer.
3. Your written defence if any, should reach to the enquiry officer within the specified period, failing which, it shall be presumed that you have no defense to put-in and in that case, an ex-parte action shall follow against you.
4. Intimate whether you desired to be heard in persons.


(GUL AFZAL KHAN)
District Police Officer,
9 Mardan.

" B "

OFFICE OF THE DISTRICT POLICE OFFICER, MARDAN

No. 560 /R/D.A-P.R-1975.

Dated 8-4 /2014

DISCIPLINARY ACTION UNDER NWFP POLICE RULES - 1975

I, **Gul Afzal Khan** District Police Officer, Mardan as competent authority am of the opinion that **Constable Aimal No.671**, has rendered himself liable to be proceeded against as he committed the following acts/omission within the meaning of section-02 (iii) of NWFP Police Rules 1975.

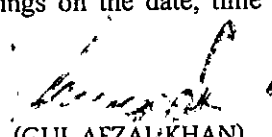
STATEMENT OF ALLEGATIONS

That **Constable Aimal No.671**, while posted at Police Station Saro Shah, deliberately absented himself from the lawful duty vide DD No. 27 dated ⁰¹⁻⁰³⁻¹⁴ 01.03.14 to-date. He is recommended for departmental proceedings by DSP/TB: vide his office letter No.R-74/TBI dated 20.03.2014.

2. For the purpose of scrutinizing the conduct of the said official with reference to the above allegations **Inspector HayatUllah Khan RI/Police Lines Mardan** is appointed as Enquiry Officer.

3. The enquiry officer shall conduct proceedings in accordance with provisions of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record its findings and make within twenty five (25) days of the receipt of this order. recommendation as to punishment or other appropriate action against the accused officer.

4. The accused officer shall join the proceedings on the date, time and place fixed by the Enquiry Officer.


(GUL AFZAL KHAN)
District Police Officer,
Mardan.

OFFICE OF THE DISTRICT POLICE OFFICER, MARDAN.

No. 560 /R, dated Mardan the 8-4 /2014.

Copy of above is forwarded to the:

1. RI/Police Lines Mardan for initiating proceedings against the accused official / Officer namely **Constable Aimal No.671**, under Police Rules, 1975.
2. **Constable Aimal No.671**, with the directions to appear before the Enquiry Officer on the date, time and place fixed by the enquiry officer for the purpose of enquiry proceedings.

***** !!! *****

فائل انکوائری اذات کنشیل عمل خان نمبر 671 متعینہ تھانہ ساڑوشاہ

جناب عالی!

بحوالہ چارج شیٹ نمبری R/560 مورخہ 08/04/14 کنشیل عمل خان نمبر 671 کے خلاف انکوائری کاغذات
موصول ہو کر جس میں مذکورہ پر الزام لگایا گیا ہے۔ کہ وہ تھانہ ساڑوشاہ سے بحوالہ مد 27 مورخہ 01/03/14 غیر حاضر رہ کر بدستور
غیر حاضر چلا آ رہا ہے۔

کنشیل عمل خان نمبر 671 کو بزرگیہ کنشیل بہرہ مند نمبر 672 اطلاع دیکر کنشیل مذکورہ مورخہ 17/04/14 کو دفتر
ہذا آ کر جس پر بذات خود چارج شیٹ تقسیم ہو کر کنشیل مذکورہ نے اپنا تحریری بیان ابھی تک داخل دفتر نہیں کیا۔
ایڈیشنل محرم محمد علی نمبر 1583/HC تھانہ ساڑوشاہ کے بیان کے مطابق کنشیل عمل خان نمبر 671 کا تبادلہ پولیس سے تھانہ ساڑوشاہ
ہوا تھا۔ محرم لائن نے بحوالہ مد 79 روز نامچہ 25/02/14 پولیس سے تھانہ ہزاروانہ کیا تھا۔ مگر کنشیل مذکورہ نے تا حال تھانہ میں
حاضری کی رپورٹ نہیں کی ہے۔ اور مد 27 روز نامچہ 01/03/14 سے بدستور غیر حاضر ہے۔

دوران انکوائری کنشیل عمل خان نمبر 671 کا سر دس ریکارڈ چیک کر کے جسمیں 07 Bad Entries جبکہ
Good Entry کوئی نہیں پائی گئی۔ کنشیل مذکورہ پر مورخہ 17/04/14 کو چارج شیٹ تقسیم ہوا تھا۔ مگر ایک ماہ گزرنے کے
باوجود بھی مذکورہ نے اپنا جواب داخل دفتر نہیں کیا ہے۔ انکوائری سے پایا گیا کہ مذکورہ 77 یوم قصداً عمدتھانہ ساڑوشاہ سے مورخہ
01/03/14 سے بدستور غیر حاضر چلا آ رہا ہے۔

کنشیل عمل خان نمبر 671 کو بوجہ 77 یوم سے بدستور غیر حاضری Major panishment دینے کی سفارش کی
جاتی ہے۔

ریزرو انسپکٹر پولیس لائن مردان

17/5/19.

Approved

Dismissed from

Service

کل قطعات (07)

No. 220/Ri

Date. 26/5/19

(1) When an officer is liable for punishment, previous proceedings shall be taken into consideration and the information and documents shall be examined by the authority concerned.

In The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No _____/2014

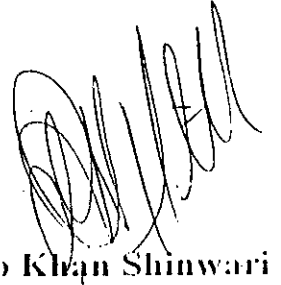
Amal Khan Versus Govt of KP through Secty Home & Tribal Affairs & Others

INDEX

S. No	Description of Document	Dated	Annex	Pg No
1.	Rejoinder and Affidavit			1-2
2.	Copy of MADD report and reply			

Appellant,

Through



Muhammad Ayub Khan Shinwari
Advocate Peshawar,

Chamber:

7-A & 11-A, Haroon Mansion,
Khyber Bazar, Peshawar.

Cell No 03219068514

1

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In Re-Service Appeal No 1238/2014

Amal Khan Versus Govt of KP through Secty Home & Tribal Affairs & Others

Rejoinder on behalf of Appellant

Respectfully Sheweth,

On Preliminary Objections:

All the preliminary objections are formal, wrong and incorrect, hence denied. It is pertinent to mention here that the respondents have not submitted the Comments by duly supported affidavit.

On Facts:


1. Para No "1" needs no reply.
2. Para No "2" needs no reply.
3. Para No "3" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct. In fact before passing the impugned order, no codal formality has been fulfilled. The Appellant reported for duty on 18-05-2014 vide MADD No 23 wherein the Appellant stated that he will give his statement before the competent authority and later on the Appellant gave reply of the Charge Sheet on 26-05-2014 to the inquiry officer but the inquiry office did no bother to consider his reply and submitted his inquiry report on the same date i.e., 26-05-2014 without considering his reply. Furthermore no final show cause notice has been given to the Appellant before passing the impugned order and no opportunity of defense and hearing has been granted to the appellant. (Copies of the MADD and reply are attached as Annex-R/1 to R/2 respectively)
4. Para No "4" of the comments is wrong and incorrect, while that of Service Appeal is correct.

On Grounds:

- a. Para "a" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct.

- b. Para "b" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct.
- c. Para "c" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct. Details are given in preceding Para's.
- d. Para "d" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct.
- e. Para "e" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct.
- f. Para "f" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct.
- g. Needs no reply.

It is, therefore, prayed that the title Service Appeal may kindly be allowed as prayed for.

Appellant,
 Through 
Muhammad Ayub Khan Shinwari
 Advocate Peshawar

Affidavit

I, Amal Khan, Ex Constable, No 671, R/o Mohallah Jogikhel, Village and P.O Sangao, Tehsil Katlang, District Mardan do hereby solemnly affirm and declare on oath that the contents of the instant rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Deponent

تقاریر سارا گوشاہ

منہجہ دران

تقریر 23 روزنامہ 18/05/04

ص 23 عالمی عالمگیر باغیچہ وقت 40-16 پر مورخہ 18/05/04 کنسٹیبل الملک اہل
 سندھ عالمگیر شہرہ کی آمد پر 23 روزنامہ 01/03/04 سے عالمگیر بیان
 کیا کہ میں بلوچستان میں آج بھی ہمسایوں بالاد کو بیان دران گا۔
 کنسٹیبل کی عالمی درجہ روزنامہ 23 پر تعلق ہوئے مناسب
 کارروائی ہمسایوں بالاد کی خدمت میں ارسال کی جائے گی

صائب علی ا

تقریر عطا لعل اہل

AMMERS-SS

جناب عالی!

گزارش صدر بحوالہ خارج شدہ، لا Statement نمبر 560
8.4.14 ALLEGATION.

موضوعی صورت میں، کہ سائیل کا تبادلہ پولیس آفیس
سے تھانہ سائبر مشالا ہو گیا تھا۔

اسے دوران سائیل کے ٹکریٹ میں درج شروع
ہو گیا تھا۔

سائیل سرورسٹ DHEQ میں شامل جانکر ڈاکٹر صاحب نے
مختلف لسٹ اور انکسپٹ کر لیا۔ اور دوران جو پڑھی

اسے سے اپنے خیر القیاس منقہ سے غیر جانبدار
ہو گیا تھا۔

سائیل بوجہ نالو سے۔ اور کم ملازمت۔ ناچھتہ ہینال
کہ دوران نہیں لگا۔

لہذا اسے دعا صلح سائیل کا غیر جانبداری صورت
میں شمار کر کے اور خارج شدہ بلا اندر کارڈ لگا

حافل دفتر فرمائی جاوے۔ اس کے ساتھ ساتھ

الو لاس

ایک نامہ بار عمل جان نمبر 671 کے ساتھ ساتھ سائبر مشالا
سے 26-8-14

صدر کل کاغذات پر لکھو

5

(8)

No.

Rs. 5

OUT-PATIENTS DEPARTMENT

NAME 671 C. S. J.

YEARLY NO. 2854

DATE 10/5/11

DISEASE

FACE VALUE RUPEES 5

[Handwritten signature]

9

28. Volitional 009

28. Ben-tor

MEDICAL OFFICE
D.H.C Hospital Maré

DATE.....

No.

Rs. 5

OUT-PATIENTS DEPARTMENT

NAME 671 - 604

YEARLY NO. 8442

DATE 26-4-15

DISEASE.....

FACE VALUE RUPEES 5

Handwritten notes:
2. 12/25/15
12/25/15
28

Handwritten note:
28

Handwritten note:
12/28

Handwritten note:
28

MEDICAL OFFICER
B.H.S. Hospital, Madras

DATE

PAGE

7

No.

Rs. 5

OUT-PATIENTS DEPARTMENT

NAME 671-26 (J)

YEARLY NO 395

DATE 3.3.14

DISEASE

Left eye - inflammation

Right eye - 1. Pseud

2. Pseud - 20/20

3. Pseud - 20/20

of Best eye

PAGE VALUE RUPEES 5

MEDICAL OFFICER

O.H.Q Hospital Mandae

DATE

PAC

8

No.

Rs. 5

OUT-PATIENTS DEPARTMENT

NAME 671-4604

YEARLY NO 4298

DATE 18-3-14

DISEASE

leg limp

PAGE VALUE RUPEES 5

Q

of no pain
loc. pr

is Orignum

of Bandy

MEDICAL OFFICER
O.H.U. Hospital Marday

کلینک: بہادر میڈیکل سنٹر
بالتقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

Not Valid For Court

آرتھوپیدک سرجن

ڈاکٹر خلیل الرحمان کا کاخیل
ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)
ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)
ماہر امراض ہڈی، جوڑو پٹھہ
آرتھوپیدک وارڈ D.H.Q. ہسپتال مردان

تاریخ 3.3.14

عمر 56

نام

[Handwritten signature]

AD
- x -
- w -

[Handwritten mark]

Dr. Farid
Dr. Farid
Dr. Farid

AD

Copy sent to
Two weeks

Orthopedic Surgeon
Dr. Khalil Rahman Kakakhail
M.B.B.S (Pesh) D.O.T (Vienna)
M.A.M.S (Vienna) FICS (USA)
D.H.Q. Hospital

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

15
آرتھوپڈک سرجن

14
کلینک: بہادر منیڈیکل سنٹر
بالمقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

Not Valid For Court

ڈاکٹر خلیل الرحمان کا کا خیل
ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)
ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)
ماہر امراض ہڈی، جوڑو پٹھہ
آرتھوپڈک وارڈ D.H.Q. ہسپتال مردان

تاریخ 18.3.14

عمل فاس

نام

ص

ق

1st Neophytin 500mg
ce

2nd Progerin 100mg
ce

3rd Penicillin 100mg
ce

1st (Ceph) Pen 1000mg
Two weeks

Dr. Khalid Rahman Kakakhali
MBBS (Fesh) D.O.T (Vienna)
M.A.M.S (Vienna) F.I.C.S (USA)
Clinic opp. D.H.Q. Hospital
Mardan.

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

21

آرتھوپیدک سرجن

ڈاکٹر خلیل الرحمان کا کا خیل

ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)

ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)

ماہر امراض ہڈی، جوڑو پٹھہ

آرتھوپیدک وارڈ D.H.Q. ہسپتال مردان

Not Valid For Court

کلینک: بہادر میڈیکل سنٹر
بالتقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

تاریخ ۱۸۔۶۔۱۶

عمر ۶۰ سال

نام

Handwritten signature/initials

Handwritten mark

28. prof - 2007

(28 Calves)

Handwritten mark

open the part
of one week

Orthopaedic Surgeon
Dr. Khalid Rahim Khan Kakakhail
M.B.B.S (Peshawar) (Vienna)
M.A.M.S (Vienna) F.I.C.S (USA)
Clinic opp. D.H.Q. Hospital
MANDAN

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

Not Valid For Court

کلینک: بہادر میڈیکل سنٹر
بالمقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

ڈاکٹر خلیل الرحمان کا کاخیل
ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)
ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)
ماہر امراض ہڈی، جوڑو پٹھہ
آرتھوپیدک وارڈ D.H.Q. ہسپتال مردان

تاریخ 16.1.15

محمد علی

نام

[Handwritten signature]

- 28 prof - low
- 28 we have
- 28 Ac - low

Complete Bed rest
for two weeks

[Signature] Surgeon
Dr. Khalil Khan Kakakhail
M.B.B.S (Fashi) D.O.T (Vienna)
M.A.M.S (Vienna) F.I.C.S (USA)
CLINIC OPP. D.H.Q. Hospital
MANDAN.

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

13

آرتھوپیدک سرجن

Not Valid For Court

کلینک: بہادر میڈیکل سنٹر
بالتقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

ڈاکٹر خلیل الرحمان کا کا خیل

ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)
ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)

ماہر امراض ہڈی، جوڑو پٹھہ
آرتھوپیدک وارڈ D.H.Q. ہسپتال مردان

نام _____ عمل خاصی _____ تاریخ ۱۵.۵.۱۶

[Handwritten signature]

Dr. Khalil Sof

Dr. Baidar

AS
cancel Bed rest
of one week

[Signature]
Dr. Khalil Rahim Khan
M.B.B.S (Peshawar) D.O.T (Vienna)
M.A.M.S (Vienna) F.I.C.S (USA)
CLINIC OPP. D.H.Q. HOSPITAL
MAHDAD

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

۱۶

آرتھو پیڈک سرجن

کلینک: بہادر میڈیکل سائنسز
بالتقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

Not Valid For Court

ڈاکٹر خلیل الرحمان کا کاخیل

ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)

ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)

ماہر امراض ہڈی، جوڑو پٹھہ

آرتھو پیڈک وارڈ D.H.Q. ہسپتال مردان

تاریخ ۲۶-۶-۱۶

محل قای

نام

[Handwritten signature]

[Handwritten mark]

۲۸ Cafe 507
✓

۲۳ Project 1
✓

۲۵ Canal
✓

[Handwritten signature]
Cafe Bed Rest
for Two weeks

[Handwritten signature]
Dr. Khaliq Sultan
Dr. Khalil Rahmani Kakakhali
M.B.B.S (Peshawar) (Vignol)
M.A.M.S (Vignol) (USA)
CHIEF OF D.H.Q. Hospital
MARDAN

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

In The Khyber Pakhtunkhwa Service Tribunal, Peshawar

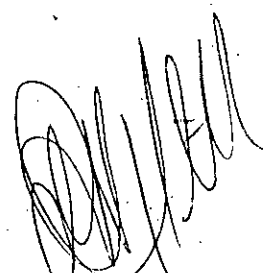
Service Appeal No _____/2014

Amal Khan Versus Govt of KP through Secty Home & Tribal Affairs & Others

INDEX

S. No	Description of Document	Dated	Annex	Pg No
1.	Rejoinder and Affidavit			1-2
2.	Copy of MADD report and reply			3-14

Appellant,
Through



Muhammad Ayub Khan Shinwari
Advocate Peshawar

Chamber:

7-A & 11-A, Haroon Mansion,
Khyber Bazar, Peshawar.
Cell No 03219068514

1

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

In Re-Service Appeal No 1238/2014

Amal Khan Versus Govt of KP through Secty Home & Tribal Affairs & Others

Rejoinder on behalf of Appellant

Respectfully Sheweth,

On Preliminary Objections:

All the preliminary objections are formal, wrong and incorrect, hence denied. It is pertinent to mention here that the respondents have not submitted the Comments by duly supported affidavit.

On Facts:

1. Para No "1" needs no reply.
2. Para No "2" needs no reply.
3. Para No "3" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct. In fact before passing the impugned order, no codal formality has been fulfilled. The Appellant reported for duty on 18-05-2014 vide MADD No 23 wherein the Appellant stated that he will give his statement before the competent authority and later on the Appellant gave reply of the Charge Sheet on 26-05-2014 to the inquiry officer but the inquiry office did no bother to consider his reply and submitted his inquiry report on the same date i.e., 26-05-2014 without considering his reply. Furthermore no final show cause notice has been given to the Appellant before passing the impugned order and no opportunity of defense and hearing has been granted to the appellant. (Copies of the MADD and reply are attached as **Annex-R/1** to **R/2** respectively)
4. Para No "4" of the comments is wrong and incorrect, while that of Service Appeal is correct.

On Grounds:

- a. Para "a" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct.

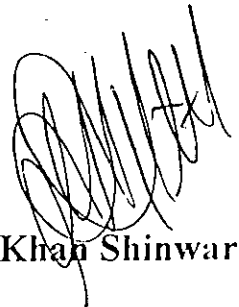
2

- b. Para "b" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct.
- c. Para "c" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct. Details are given in preceding Para's.
- d. Para "d" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct.
- e. Para "e" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct.
- f. Para "f" of the comments is wrong, incorrect, mis leading and mis conceived, hence denied while that of Service Appeal is correct.
- g. Needs no reply.

It is, therefore, prayed that the title Service Appeal may kindly be allowed as prayed for.

Through

Appellant,


Muhammad Ayub Khan Shinwari
Advocate Peshawar

Affidavit

I, Amal Khan, Ex Constable, No 671, R/o Mohallah Jogikhel, Village and P.O Sangao, Tehsil Katlang, District Mardan do hereby solemnly affirm and declare on oath that the contents of the instant rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Deponent

3
توانہ ساروش شاہ

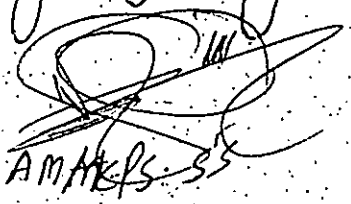
منبر وال

تقلیر 3 دے روزنا عی 18/05
014

مر 23 عا لزی عا طنز پ ا حال نو وقت 40-16 عر صر صر 18/05 کتسپیل المل ا 67
عند عا ل شہرہ عا ل مد جہہ روزنا عی 03/01 سے عا ل کر بیان
کنا - کہ میں بدور ان پیشی اہسرا ان بالاکو بیان ا دل کا۔
کتسپیل کچی عا لزی درع روزنا عی ہور تقلیر بولہ مناسب
کاروان اہسرا ان بالاکو خدمت میں ارسال کچی عا لزی

صا عالی ا

تقلیر عطا لقی لعل عی


AMAKPS.SS

جانب عالی

گزارش صدر بحوالہ خارج شدہ Statement No 560
8.4.11 ALLEGATION

موصوفی حکومت ہوں، کہ سائیل کا تبادلہ لو لیس لائن
میں تھا، ساگر مشالا ہو گیا تھا۔
اسے دوران سائیل کے ٹکری سے شہر میں درو شروع
ہو گیا تھا۔

سائیل سروریت DHA میں لہاں جا کر ڈالہر دہا ہے
مختلف لسٹ اور انکسپٹ کرنا۔ اور دوائی جو تری
اسے سے اپنے خیر القیہ منقیہ سے غیر حاضہ
ہو گیا تھا۔
سائیل بوجہ فالو ہے۔ اور کم ملازمت۔ نا تجربہ ہینال
کہ سوائیل نہیں گی۔

لہذا اسے صلیغ سائیل کا غیر جانہری رخصت
میں شمار کر کے اور خارج شدہ بلا لہر کاروان
داخل دفتر فرمائی جا رہے۔
اس کے لئے محتاط رہو نا

الذات
انکا نامہ دار عمل جان عمر 671
سے 5/26

صدر کل کاغذات - پیر اول

8

No.

Rs. 5

5

OUT-PATIENTS DEPARTMENT

NAME... 671... C. E. J. ...

YEARLY NO... 2854

DATE... 10. 15. 74

DISEASE

PAGE VALUE RUPEES 5

[Handwritten signature]

2

28. Voluntary work

28. Ben-tor

MEDICAL OFFICE
D.H.Q Hospital Maré

DATE.....

No.

Rs. 5

OUT-PATIENTS DEPARTMENT

NAME 671 *671*.....

YEARLY NO..... *8412*

DATE..... *26-4-75*

DISEASE.....

PAGE VALUE RUPEES 5

6

2 ^{*108*} *128* *118*

28 *128*

128 *128*

28 *128*

MEDICAL OFFICER
Bill & Hospital Mardoa

DATE

PA 7

No.

Rs. 5

OUT-PATIENTS DEPARTMENT

NAME 671-26 J

YEARLY NO 395

DATE 2. 2. 14

DISEASE

Ch. on left side

8 - 3 - 1000

28 - 1000

25 - 1000

of 1000

PAGE VALUE RUPEES 5


MEDICAL OFFICER

D.H.O Hospital Murdab

DATE

PAGE

8

No.

Rs. 5

OUT-PATIENTS DEPARTMENT

NAME

671-4604

YEARLY NO

4298

DATE

18-3-14

DISEASE

leg leg

PAGE VALUE RUPEES 5

Dr. N. M. ...

Dr. ...

Dr. ...

MEDICAL OFFICER
O.H.Q. Hospital Mardar

کلینک: بہادر میڈیکل سنٹر
بالتقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

Not Valid For Court

آرتھوپیدک سرجن
ڈاکٹر خلیل الرحمان کا کا خیل
ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)
ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)
ماہر امراض ہڈی، جوڑو پٹھہ
آرتھوپیدک وارڈ، D.H.Q. ہسپتال مردان

تاریخ 19. 5. 19

گنگو خان

نام

Signature

AD
x - x - x
AP Car
- a - a - a

Signature
Practical
Prex - est
Contad e f
Aardoe ca

Copy sent to
Two weeks

Orthopedic Surgeon
Dr. Khalil Rahman Kakakhail
FICS (Push) D.O.T (Vienna)
FICS (Vienna) FICS (USA)
D.H.Q. HOSPITAL

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

کلینک: بہادر میڈیکل سنٹر
بالتقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

Not Valid For Court

10

آرتھو پیڈک سرجن

ڈاکٹر خلیل الرحمان کا کا خیل
ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)
ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)
ماہر امراض ہڈی، جوڑو پٹھہ
آرتھو پیڈک وارڈ D.H.Q. ہسپتال مردان

تاریخ 15.3.14

عمل فاس

نام

ص

ق

For neoplasia sent

25 Prognosis

25 Benign

AD (op) for 2 weeks

Orthopedic Surgeon
Dr. Khalid Rahman Kakakhali
M.B.B.S. (Fest) D.O.T. (Vienna)
M.A.M.S. (Vienna) F.I.C.S. (USA)
CLINIC OPP. D.H.Q. Hospital
Mardan.

دن بعد دوبارہ معائنہ کیجئے تشریف لائیں۔

کلینک: بہادر میڈیکل سنٹر
بالتقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

Not Valid For Court

آرتھو پیڈک سرجن
ڈاکٹر خلیل الرحمان کا خیل
ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)
ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)
ماہر امراض ہڈی، جوڑو پٹھہ
آرتھو پیڈک وارڈ D.H.Q. ہسپتال مردان

تاریخ ۱۶۔۰۶۔۱۸

عجلتاً

نام

لا

۲

28. post op

(28 Calve)

— ۳

نات

expected rest
of one week

Orthopedic Surgeon
Dr. Khalil Rahimani Kakkhail
M.B.B.S. (Peshawar) D.O.T. (Vienna)
M.A.M.S. (Vienna) F.R.C.S. (USA)
Clinic Opp. D.H.Q. Hospital
Mardan.

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

12

آرتھو پیڈک سرجن

ڈاکٹر خلیل الرحمان کا کاخیل

ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)
ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)

ماہر امراض ہڈی، جوڑو و ہاتھ

آرتھو پیڈک وارڈ D.H.Q. ہسپتال مردان

Not Valid For Court

کلینک: بہادر میڈیکل سنٹر
بالمقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

تاریخ ۱۶.۱۰.۲۰۲۰

مخبر کا نام

نام

[Handwritten signature]

28 prof. level

28 w/gene

28 Ac. labal

[Handwritten signature]
Complete Bed rest
for two weeks

[Handwritten signature]
Surgeon
Dr. Khalil Karim Kakakheli
M.B.B.S (Pesh) D.O.T. (Vienna)
M.A.M.S (Vienna) F.I.C.S. (USA)
Clinic: Opp. D.H.Q. Hospital
Mardan.

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

13

آرتھوپیدک سرجن

ڈاکٹر خلیل الرحمان کا کا خیل

ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)

ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)

ماہر امراض ہڈی، جوڑو پٹھہ

آرتھوپیدک وارڈ D.H.Q. ہسپتال مردان

Not Valid For Court

کلینک: بہادر میڈیکل سنٹر
بالتقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

نام

عمل جاری

تاریخ ۱۵.۵.۱۶

[Handwritten signature]

Dr. Khalil Sof

Dr. Baidar

AS
control Bed rest
of one week

[Signature]
Dr. Khalil Rahman Kakakhel
M.B.B.S (Peshawar) (VIENNA)
M.A.M.S (VIENNA) F.R.C.S (USA)
CLINIC OPP. D.H.Q. HOSPITAL
MAHDAD

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

کلینک: بہادر میڈیکل سنٹر
بالتقابل ڈی ایچ کیو ہسپتال مردان
موبائل: 0321-9323868

Not Valid For Court

14

آرتھو پیڈک سرجن

ڈاکٹر خلیل الرحمان کا کا خیل

ایم بی بی ایس (پشاور) ڈی او ٹی (ویانا)

ایم اے ایم ایس (ویانا) ایف آئی سی ایس (امریکہ)

ماہر امراض ہڈی، جوڑو پٹھہ

آرتھو پیڈک وارڈ D.H.Q. ہسپتال مردان

تاریخ 16-4-16

محل فانی

نام

[Handwritten signature]

[Handwritten mark]

28 Cafe 504

25 Majestic

28 Caland

Ag
Cafe 504
for two weeks

[Handwritten signature]
Dr. Khaliq Rahim Kakakhali
MBBS (Pesh) D.O. (Vizna)
M.A.M.S. (Vizna) M.S. (USA)
Chief Ortho. D.H.Q. Hospital
Mardan

دن بعد دوبارہ معائنہ کیلئے تشریف لائیں۔

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No 2716 /ST

Dated 20 /12/2017


To

The District Police Officer,
Government of Khyber Pakhtunkhwa,
Mardan.

Subject: **JUDGEMENT/ ORDER IN APPEAL NO. 1238/14, Mr.AMAL KHAN.**

I am directed to forward herewith a certified copy of Judgment/order dated 11/12/2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.

DL