

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 1230/2022


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/08/2022	<p>The appeal of Mr. Amjid Khan resubmitted today by Mr. Saadullah Khan Marwat Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;">REGISTRAR</p>

The appeal of Mr. Amjid Khan S/O Bukhari Gul, Ex-Constable no. 2142, District Police Mardan received today i.e. on 05.08.2022 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 annexures B & F attached with the appeal are illegible which may be replaced by legible/better one.

No. 2368 /S.T,

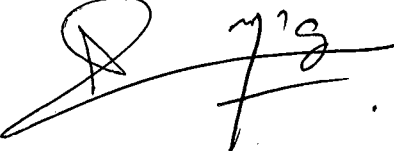
Dt. 10/8 /2022


ASSISTANT REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Saad Ullah Khan Marwat Adv. Pesh.

Sir,

Re-submitted after removing all
objections.


7/8

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Amjad Khan v/s DPO & others

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: <u>Saeedullah Khan Marwat</u>	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name: Saeedullah Khan Marwat

Signature: [Signature]

Dated: 04-08-22

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. 1230 /2022

Amjid Khan

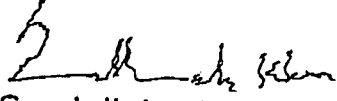
versus

DPO & Others

INDEX

S. No	Documents	Annex	P. No.
1.	Memo of Appeal		1-3
2.	Medical Receipts	"A"	4-11
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4.	Representation dated 20-04-2022	"C"	13
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7.	Rejection order dated 18-07-2022	"F"	17

Through Appellant


Saadullah Khan Marwat
Advocate.
21-A Nasir Mansion,
Shoba Bazaar, Peshawar.
Ph: 0300-5872676

Dated.03-08-2022

BEFORE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. 1230 /2022

Amjid Khan S/O Bukhari Gul
R/O Gulbahar Colony,
Takhtbai Mardan.
Ex-Constable No. 2142,
District Police, Mardan Appellant

Versus

1. District Police Officer,
Mardan.
2. Regional Police Officer
Mardan.
3. Provincial Police Officer,
KP, Peshawar Respondents

**APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST OB NO. 739 DATED 21-03-2022 OF R. NO.
01 WHEREBY APPELLANT WAS DISMISSED FROM
SERVICE RETROSPECTIVELY OR OFFICE ORDER NO.
4111/ES DATED 13-06-2022 OF R. NO. 02 WHEREBY
DEPARTMENTAL APPEAL OF APPELLANT WAS
REJECTED OR OFFICE ORDER NO. 1521/22 DATED
18-07-2022 OF R. NO. 03 WHEREBY REVISION
PETITION OF APPELLANT WAS REJECTED.**

Respectfully Sheweth;

1. That appellant was appointed as Constable in the year 2010 and since then performed his official duties to the best of ability and with efficiency. . .

2. That sister of appellant was affected by Cancer disease and treatment from local consultants was made but without any fruitful results. Finally the disease was diagnosed as Cancer and admitted in Shaukat Khanam Memorial Cancer Hospital and Research Centre, Lahore. She is still undergoing treatment. (Copies of medical receipts as annex "A")
3. That there was none in the family to look-after her ill sister at various places for treatment except appellant, so in the compelling circumstances as stated above was busy there at Lahore.
4. That on 21/22-03-2022, appellant was dismissed from service on account on absence by R. No. 01 but with retrospective affect i.e. 24-09-2021. (Copy as annex "B")
5. That on 20-04-2022, appellant submitted representation before R. No. 02 for reinstatement in service by highlighting his exigency, yet the same was rejected on 13-06-2022. (Copies as annex "C" & "D")
6. That on 06-07-2022, appellant submitted mercy petition before R. No. 03 for reinstatement in service but the same was also rejected on 18-07-2022. (Copies as annex "E" & "F")

Hence this appeal, inter alia, on the following grounds:-

GROUND S:

- a. That absence from duty, if any, was neither willful nor intentional but was due to the illness of the sister which is till undergoing treatment in Cancer Hospital at Lahore.
- b. That inquiry in to the matter was not conducted as per the mandate of law. Neither any statement of any concerned was recorded in his presence nor appellant was served with final Show Cause Notice what to speak of personal hearing.
- c. That the impugned orders of the respondents are ab-initio void, so no limitation runs against void orders.

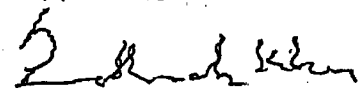
- d. That the matter against appellant was not taken as per the mandate of law, so the same is based on malafide by keeping in view his engagements in the illness of his sister.
- e. That appellant has in credit earned leave, so the absence period could be adjusted therein. At the same time, he was in PS Kaloshah Mardan.

It is, therefore, most humbly prayed that on acceptance of appeal, orders dated 21/22-03-2022 and 13-06-2022 & 18-07-2022 of the respondents be set aside and appellant be reinstated in service with all back benefits, with such other relief as may be deemed proper and just in circumstances of the case.



Appellant

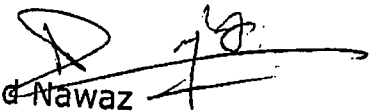
Through



Saadullah Khan Marwat



Arbab Saiful Kamal



Amjad Nawaz
Advocates.

Dated 03-08-2022

AFFIDAVIT

I, Amjid Khan S/O Bukhari Gul R/O Gulbahar Colony, Takhtbai Mardan. Ex-Constable No. 2142, District Police, Mardan (Appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief.



DEPONENT

CERTIFICATE

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.



ADVOCATE

Shauk Khanum Memorial Cancer Hospital & Research Centre

Office Enclave, Phase 5, Hayatabad Peshawar, Phone: +92 91 5885000, Fax: 92 91 5823815
 Email: info@skm.org.pk, Website: www.shaukalkhanum.org.pk

44



Invoice

ORIGINAL

Name: NABILA GUL
Hand Name: BUKHARI GUL
Age: 30 Year(s)
Date of Birth: 03-03-1991
Address: GUL BAHAR COLONY Takht Bhai Pakistan
Phone Number: 92 0300 5718755, 92 0343 9082784

Medical Record No.: 000-00185966
Credit #: 21-0877197
Invoice #: 006210357991
Invoice Date: 30-AUG-2021 11:19 AM

In House Doctor: SAMIR FASIH DR.
Clinic: MEDICAL ONCOLOGY (TELEMEDICINE)

Sr.No	CPT ID	Description	Stat	Qty	Actual Price	Stat Charge	Discount	Amount	Report Date	Doctor Name	Dr. Sta
		Pathology									
1	R4999	CA-125	NO	1	5,250.00			5,250.00	30-08-2021 08:00 PM	Samir Fasih Dr.	
Total Amount								5,250.00			
Financial Support Provided								5,250.00			

Running Balance Advance: 0

NOTE: 1. This is a system generated document and does not require any signature/stamp.
 2. Reports / Refund(s) due, if any, will be processed upon production of this original document.

Print date: 30-AUG-2021 11:20 AM
User code: 00160000011491
Terminal: WESPENH

Invoice Trn date: 30-AUG-2021 11:19 AM
Invoice Trn User: 00160000011491
Invoice Trn Terminal: SKMP-0112

Object Code: S06R1:P01

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Shaukat Khanum Memorial Cancer Hospital & Research Centre

Plot # 5-B, Sector 3, Office Enclave, Phase -5, Hayatabad Peshawar. Phone: +92 91 5885000; Fax: 92 91 5823815
Email: info@skm.org.pk, Website: www.shaukalkhanum.org.pk



Invoice

ORIGINAL

Patient Name	NABILA GUL	Medical Record No.	000-00185966
Father/Husband Name	BUKHARI GUL	Order #	21-1583512
Donor MRNO		Invoice #	006210532068
Name		Invoice Date	30-NOV-2021 11:51 AM
Sex	Female	Age	30 Year(s)
Date of Birth	03-03-1991	NIC #	16-10227567894
Address	GUL BAHAR COLONY Takht Bhar Pakistan		
Phone Number	92 0300 5718769, 92 0343 9082784		
		In House Doctor	BIUSHRA AHSAN DR.

Sl.No	CPID	Description	Stat	Qty	Actual Price	Stat Charges	Discount	Amount	Report Date	Doctor Name	Stat
Radiology											
1	72197	MRI pelvis with contrast	NO	1	23,000.00			23,000.00	02-12-2021 08:00 PM	Bushra Ahsan Dr.	
3	71061	CT chest and abdomen with contrast	NO	1	23,000.00			23,000.00	02-12-2021 08:00 PM	Bushra Ahsan Dr.	
Total Amount								46,000.00			
Financial Support Provided								46,000.00			

Running Balance Advance: 0

NOTE: 1. This is a system generated document and does not require any signature/stamp.
2. Reports / Refund(s) due, if any, will be processed upon production of this original document.

Print date	30-NOV-2021 11:51 AM	Invoice Trn date	30-NOV-2021 11:51 AM	Object Code:	S06REP000
User code	00160000012769	Invoice Trn User	00160000012769		
Terminal	WLSUHR3	Invoice Trn Terminal	SKMP-101		Page 1 of 1

Shaukat Khanum Memorial Cancer Hospital & Research Centre

Town, Lahore, Pakistan. Phone: +92-42-35905000, 111-155-555. Fax: 042-35945198
 Email: Info@skm.org.pk. Website: www.shaukatkhanum.org.pk

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 10

Invoice ORIGINAL

Patient Name: NABILA GUL Husband Name: BUKHARI GUL Age: 30 Year(s) Date of Birth: 03-03-1991 Address: GUL BAHAR COLONY Takhi Bhai Pakistan Phone Number: 92 0300 5718769, 92 0343 9082784	Medical Record No.: 000-00185966 Order #: 21-2005150 Invoice #: 001212431336 Invoice Date: 20-DEC-2021 09:39 AM In House Doctor: SAMIR FASIH DR. Report Destination: CHEMO ADULT
--	---

Sr.No	IPT ID	Description	Stat	Qty	Actual Price	Stat Charges	Discount	Amount	Doctor Name
General									
2	92394	PPE Chemo bay	NO		200.00			200.00	
Medical Oncology									
1	96412	REGIME C	NO	1	4,500.00			4,500.00	Samir Fa Dr.
Total Amount								4,700.00	
Financial Support Provided								4,700.00	

10

Running Balance Advance: 0

NOTE: 1. This is a system generated document and does not require any signature/stamp.
 2. Reports / Refund(s) due, if any, will be processed upon production of this original document.

Print date: 20-DEC-2021 09:39 AM	Invoice Trn date: 20-DEC-2021 09:39 AM	Object Code: S06REF
User code: 00160000009702	Invoice Trn User: 00160000009702	
Terminal: WLSLJIR3	Invoice Trn Terminal: SKM-1867	Page

Af Khanum Memorial Cancer Hospital and Research Centre

M.A. Johar Town, Township P.O. Box No. 13014, Lahore, Pakistan +92-42-35905000, 111-155-555 042-35945198



INVOICE

ORIGINAL

Husband Name : NADILA GUL
 : RUKHARI GUL
 Sex Of Birth : Female
 : 03-KAR-01
 Marital Status : Single
 N.I.C No : 1610227567894
 Address :
 Phone Number : 02 0300 5718769,92 0343 9062784
 Patient Type : REGULAR SKM ZAKAT

Order # : 210101505
 Medical Record No : 000-001R5966
 Invoice No # : 001-21-24J1317
 Invoice Date : 20-DEC-2021 09:38:03 AM
 Receipt # :
 Referring Doctor : SAMIR FASIH DR.
 In House Doctor :
 Clinic :
 Company Name : SKMCH&RC
 Token # : N/A

S.No.	Medicine	Dispense Date	Qty Issued	Qty Returned	Unit Price	Amount
1	Cimetidine HCl Injection 1000 mg (Zeler)	20-12-21 09:38	1740	0	9.251	16,096.740
2	Sodium Chloride 0.9% Infusion 500 ml (Sterile Inj) NS)	20-12-21 09:38	1	0	97.840	97.840
3	CARROPAIN Injection 450 mg (Complain)	20-12-21 09:38	750	0	14.750	11,062.500
4	Dextrose 5% Infusion 500 ml (Sterile Inj 5%-500ml)	20-12-21 09:38	1	0	105.190	105.190
5	Ondansetron Injection 8 mg (Oswil)	20-12-21 09:38	1	0	129.000	129.000
6	DEXAMETHASONE Injection 4 mg (Dexamethasone (Venus Pharam))	20-12-21 09:38	3	0	14.000	42.000
7	Ondansetron Tablets 8 mg (Ondimax)	20-12-21 09:38	8	0	190.000	1,520.000
8	DEXAMETHASONE Tablets 0.5 mg (Dexamethasone (Venus))	20-12-21 09:38	48	0	0.293	14.064

Total Amount : 29,067.33
 Financial Support Provided : 29,067.33

Running Balance (Advance): 0

Note: 1. This is a system generated document and does not require any signature/stamp.
 2. Refund(s) due, if any, will be processed upon production of this original document.
 3. For prepared medicines only total bill includes 10% pharmacy charges.
 4. Drugs are sold at company approved prices.
 5. Pridge items, Open bottles, Syrups and Suspension etc once sold will not be exchanged or taken back.
 6. The prices of medicines (especially import medicines) may vary occasionally due to un-controllable circumstances. We try our level best to avoid such issues. Please contact pharmacy in case of any query.

NTN : 22-111-0786785
 Print date: 20-DEC-2021 09:38:08
 User name: RAO ALI JA WAD
 Terminal : SKM-1867
 Sales Tax Reg. No. : 03-92-99999-304-67
 Invoice Trm date: 20-DEC-2021 09:38 AM
 Invoice Trm User: 0016000009702
 Invoice Trm Terminal: SKM-1867
 Page 1 of 1
 Object Code: S06REP00104

Shaukat Khanum Memorial Cancer Hospital & Research Centre

Town, Lahore, Pakistan. Phone: +92-42-35905000, 111-155-555, Fax: +92-35945198.
 Email: info@skm.org.pk. Website: www.shaukatkhanum.org.pk

8



Invoice

ORIGINAL

Patient Name	NABILA GUL	Medical Record No.	: 000-00185938
Parent Name	BUKHARI GUL	Order #	: 21-2036085
Gender	Female	Age	: 30 Year(s)
DOB	03-03-1991	NIC.#	: 1610227567894
Address	GUL BAHAR COLONY Takhi Bhai Pakistan		
Phone Number	92 0300 5718769.92 0343 9082784		
		In House Doctor	: SAMIR FASIH DR.
		Report Destination	: CHEMO ADULT
		Invoice #	: 001212479106
		Invoice Date	: 27-DEC-2021 07:09 AM

Sr.No	CPT ID	Description	Unit	Qty	Actual Price	Start Charges	Discount	Amount	Doctor Name	Box Size
General										
2	99304	PPE Chemo bay	NO	1	200.00			200.00		
Medical Oncology										
1	98412	REGIME C	NO	1	4,500.00			4,500.00	Samir Fasih Dr.	
Total Amount								4,700.00		
Financial Support Provided								4,700.00		

10

Running Balance Advance: 0

NOTE: 1. This is a system generated document and does not require any signature/stamp.
 2. Reports / Refund(s) due, if any, will be processed upon production of this original document.

Print date	27-DEC-2021 07:09 AM	Invoice Trn date	27-DEC-2021 07:09 AM	Object Code:	S06REP0007
Server code	00160000000341	Invoice Trn User	00160000000341		
Terminal	WLSI.HR.3	Invoice Trn Terminal	SEMI-1867		

Khanum Memorial Cancer Hospital and Research Centre

A. Johar Town, Township P.O. Box No. 13014, Lahore, Pakistan +92-42-35905000, 111-155-555 042-35945198



Invoice

ORIGINAL

9

: NABILA GUL
 Husband Name : BUKHARI GUL
 : Female
 Date of Birth : 03-MAR-91
 Marital Status : Single
 N.I.C.No : 1610227567894
 Address :
 Phone Number : 92 0300 5718769,92 0343 9082784
 Patient Type : REGULAR SKM. ZAKAT

Order # : 210103254
 Medical Record No : 000-00185966
 Invoice No # : 001-21-2479124
 Invoice Date : 27-DEC-2021 07:14:47 AM
 Receipt # :
 Referring Doctor :
 In House Doctor : SAMIR FASIH DR.
 Clinic :
 Company Name : SKMCH&RC
 Token # : **N/A**

S.No.	Medicine	Dispense Date	Qty Issued	Qty Returned	Unit Price	Amount
1	Genetabine HCl Injection 1000 mg (Zefen)	27-12-21 07:14	1740	0	9.251	16,096.740
2	Sodium Chloride 0.9% Infusion 500 ml (Sterilized NS)	27-12-21 07:14	1	0	97.840	97.840
3	MOCClopramide Injection 10 mg (Metomide)	27-12-21 07:14	1	0	27.525	27.525

Total Amount : 16,222.11
 Financial Support Provided : 16,222.11

Running Balance (Advance): 0

- Note:**
1. This is a system generated document and does not require any signature/stamp.
 2. Refund(s) due, if any, will be processed upon production of this original document.
 3. For prepared medicines only total bill includes 10% pharmacy charges.
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 5. Fridge items, Open bottles, Syrups and Suspension etc once sold will not be exchanged or taken back.
 6. The prices of medicines (especially import medicines) may vary occasionally due to un-controllable circumstances. We try our level best to avoid such issues. Please contact pharmacy in case of any query.

NTN: 2|2|-1|1|-0|7|8|6|7|8|5

Sales Tax Reg. No. : 03-92-9999-304-64

Print date: 27-DEC-2021 07:14:50
 User name: MUHAMMAD SARDAR
 Terminal: SKM-1867
 Invoice Trn date: 27-DEC-2021 07:14 AM
 Invoice Trn User: 00160000000341
 Invoice Trn Terminal: SKM-1867

Page 1 of 1
Object Code: S06REP00104

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 Jinnah Town, Lahore, Pakistan. Phone: +92-42-35905000, 111-155-555, Fax: 042-35945198
 E mail: info@skm.org.pk, Website: www.shaukatkhanum.org.pk

10

Invoice

ORIGINAL

Name : NABILA GUL
 Husband Name : BUKHARI GUL
 MRNO :
 Sex : Female Age : 30 Year(s)
 Date of Birth : 03-03-1991 NIC.#: 1610227567894
 Address : GUL BAHAR COLONY Takht Bhal Pakistan
 Phone Number : 92 0300 5718769,92 0343 9082764

Medical Record No. : 000-00185966
 Order # : 22-0042026
 Invoice # : 001220106842
 Invoice Date : 16-JAN-2022 08:23 AM

In House Doctor : SAMIR FASIH DR.

Report Destination : CHEMO ADULT

SeqNo	CPT ID	Description	Stat	Qty	Actual Price	Stat Charge	Discount	Amount
General								
2	99394	PPT Chemotherapy	NO	1	200.00			200.00
Medical Oncology								
1	96412	REGIME C	NO	1	4,500.00			4,500.00
Total Amount								4,700.00
Financial Support Provided								4,700.00

Doc No

Samir Dr.

Running Balance Advance: 0

NOTE: 1. This is a system generated document and does not require any signature/stamp.
 2. Reports / Refund(s) due, if any, will be processed upon production of this original document.

Print Date : 16-JAN-2022 08:23 AM
 User code : 00160000009012
 Terminal : WLSL.HR3

Invoice Trn date : 16-JAN-2022 08:23 AM
 Invoice Trn User : 00160000009012
 Invoice Trn Terminal : SKM-0563

11

at Khanum Memorial Cancer Hospital & Research Centre

Johar Town, Lahore, Pakistan Phone: +92-42-35905000, 111-155-555, Fax: 042-35945198
 Email: info@skm.org.pk, Website: www.shaukalkhanum.org.pk

CHEMOTHERAPY PROTOCOL SCHEDULE

00000185966

Wablia Gul

: 30 Year(s)

: Female

Diagnosis : Ovarian Carcinoma

Protocol : CARBO+GEM

Plan No. : 2

Oncologist : Samir Fasih Dr.

Intent : Curative No. of Cycles : 8

Online Orders

Plan	Diagnosis	Regimen	Cycle No.	Day No.	Appointment Date	Appointment Duration	Doctor
2	Ovarian Carcinoma	CARBO+GEM	1	1	20-DEC-21 09:15	2 hrs 25 min	Samir Fasih Dr.
			1	2	27-DEC-21 20:30	1 hrs 40 min	Samir Fasih Dr.
			2	1	16-JAN-22 08:35	2 hrs 25 min	Samir Fasih Dr.
			2	2	23-JAN-22 08:35	1 hrs 40 min	Samir Fasih Dr.

Regimen Detail: Carboplatin, Gemcitabine

Other Orders

Diagnosis	Regimen	Cycle No.	Day No.	Appointment Date	Appointment Duration	Doctor

Oncologist Follow-up Appointments

Clinic Name	Appointment Date
MEDICAL ONCOLOGY (TELEMEDICINE CLINIC) - DR. SAMIR FASI	31-JAN-2022 13:00:00

Blood Tests

CPT
Bicarbonate, Electrolytes (Na, K, Cl), Urea Nitrogen, Creatinine

CBC + Auto Differential (5 Parts) Includes Hb

LFT (TP, ALP, ALB, T.BILI, ALT, AST, GGT, A/G ratio)

Blood tests to be done 48 hours before your next chemotherapy appointment

21-01-22
Tests

B

12

Batterfly

6

MARDAN**No. 2516-17 PA.
22/03/2022****Dated****ORDER ON ENQUIRY OF CONSTABLE AMJID KHAN NO. 2142**

This order will dispose-off a Departmental Enquiry under Police Rules 1975, initiated against the subject official, under the allegations that while posted at Police Station Baizo (Now PS Sheikh Maltoon), remained absent from duty without any leave/permission of the competent authority vide DD No. 30 dated 24-09-2021 till date.

To ascertain facts, he was proceeded against departmentally through Mr. Ijaz Ali SDPO Rural Mardan vide this office statement of Disciplinary action/charge sheet No. 243/PA dated 02-11-2021, who (E.O) after fulfilling necessary process, submitted his Finding Report to this office vide his letter No. 91/ST dated 07-01-2022, holding responsible the delinquent official of gross misconduct on the basis not submitting his reply in compliance of delivered statement of Disciplinary Action/Charge sheet within stipulated time of (7) days to him (Inquiry Officer), so recommended for ex-parte action.

In order to further verify his misconduct, he was called for hearing in Orderly Room on 16-02-2022, 09-03-2022 & 16-03-2022 respectively on proper delivered notices, but neither has he appeared before the undersigned, no assumed duty till-date, clarifying that he is not a willing worker in Police Force.

FINAL ORDER.

In the light of above discussion, finding of enquiry officer & material on record as well as bad record of (34) bad entries with (02) good entries, the undersigned is of the considered opinion that Constable Amjid Khan is no more interested in Police Service, therefore, awarded him major punishment of dismissal from Police Force Mardan with effect from 24-09-2021 with immediate effect in exercise of the power vested in me under P-R1975.

**OB No. 739
Dated 21-03-2022****Sd/-****(Dr. Zahid Ullah) PSP
District Police Officer
Mardan.****Copy forwarded for information & n/action to:-**

1. The DSP Katlang, Shiekh Maltoon & Hqrs Mardan.
2. The P.O & E.O (Police Office) Mardan.
3. The OSI (Police Office) Mardan with () sheets.

22-3-22

Dated 22/3/22

ORDER ON NOTICE ON CONSTABLE AMIT KHAN NO 2142

The undersigned on 07-09-2021 Departmental Enquiry under Police Rules 1973 conducted against the Constable and the allegations that while posted at the Station House (Now PS Sheikh Malluon), remained absent from duty without any authority vide DD No. 30 dated 24-09-2021 (ill-date).

To ascertain facts he was proceeded against departmentally through Mr. A. S. Raza as an Enquiry Officer. Statement of Disciplinary Action/Charge Sheet No. 2142/2021 dated 02-11-2021, who (F.O) after fulfilling necessary process, submitted his report on 07-01-2022. The undersigned vide his office letter No. 91/ST dated 07-01-2022, holding the Constable responsible for dereliction of gross misconduct on the basis of not submitting his reply in compliance of delivered Statement of Disciplinary Action/Charge Sheet within stipulated time of 15 days to the Enquiry Officer, so recommended for ex-parte action.

Further to verify his misconduct, he was called for hearing in 07-02-2022, 09-03-2022 & 16-03-2022 respectively on proper delivered notices, but neither time he appeared before the undersigned nor assumed duty full-date, thereby proving that he is not a willing worker in Police Force.

Final Order

In view of above discussion, findings of enquiry officer & material on record, as per record of (64) bad entries with (02) good entries, the undersigned is of the opinion that Constable Amit Khan is no more interested in Police Service, therefore, the undersigned recommends the Constable for dismissal from Police Force, Mardan with effect from 24-09-2021 with immediate effect. In exercise of the power vested in me under P-R 1975.

Dated 22/3/2022


District Police Officer
Mardan

For information & n/action to:-
1. Station House Officer, Sheikh Malluon & H.O.s Mardan
2. District Police Officer, Mardan
3. District Police Officer, Mardan with (02) Sheets

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بسم الله الرحمن الرحيم

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بسم الله الرحمن الرحيم

الحمد لله رب العالمين والصلوة والسلام على سيدنا محمد وآله الطيبين الطاهرين

أما بعد

فإن الله قد جعل في كتابه العزيز آيات كثيرة تدل على وحدانيته وتوحيده

وأنه لا شريك له في الملك والقدرة والجلال والإكرام

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13-6-22

ORDER.

This order will dispose-off the departmental appeal preferred by Ex-Constable Amjid Khan No. 2142 of Mardan District Police against the order of District Police Officer, Mardan, whereby he was awarded major punishment of dismissal from service vide OB No. 739 dated 21.03.2022. The appellant was proceeded against departmentally on the allegations that he while posted at Police Station Balzo District Mardan absented himself from his lawful duty vide daily diary No. 30 dated 24.09.2021 till date of his dismissal without any leave/permission of the competent authority.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and the then Sub Divisional Police Officer, (SDPO) Rural, Mardan was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities, submitted his findings wherein he reported that the defaulter Officer was contacted time and again to appear before the enquiry Officer, but he failed and remained absent, which showed that he was no more interested in Police Service. He recommended the delinquent Officer for ex-parte action.

In order to further verify his misconduct, he was called for hearing in Orderly Rooms on 16.02.2022, 09.03.2022 and 16.03.2022 respectively on proper delivered notices, but neither he has appeared before the District Police Officer, Mardan, nor assumed duty till date of above mentioned dates, clarifying that he is not a willing worker in Police Force.

In the light of above discussion, findings of enquiry officer and materials available on record as well as bad record of (34) bad entries with (02) good entries, the delinquent Officer was awarded major punishment of dismissal from service with effect from 24.09.2021 vide OB No. 739 dated 21.03.2022 by the District Police Officer, Mardan.

Feeling aggrieved from the order of District Police Officer, Mardan, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 08.06.2022.

From the perusal of the enquiry file and service record of the appellant, it has been found that the delinquent Officer has been showing irresponsible attitude in utter disregard of the discipline of the force. He could not present any cogent justification for such long absence from duty i.e 05 months and 02 days. It is worthwhile that the appellant approached this forum with the delay of 01 month and

02 days without advancing ¹⁵ any cogent reason, hence, time barred. Therefore, order passed by the competent authority does not warrant any interference.

Based on the above, I, Yaseen Farooq, PSP Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being bereft of any substance as well as time barred for 01 month and 02 days.

Order Announced.


Regional Police Officer,
Mardan.

No. 4111 /ES, Dated Mardan the 13 / 06 /2022.

Copy forwarded to District Police Officer, Mardan for information and necessary w/r to his office Memo: No. 135/LB dated 01.06.2022. His Service Record is returned herewith.

(*****)

06/10/90 11:00 AM

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5-7-22

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OFFICE OF THE
INSPECTOR GENERAL OF

KHYBER PAKHTUNKHWA

Central Police Office, Peshawar

No. SI/158/22, dated Peshawar the 18/7/2022

The Regional Police Officer
Mardan

REVISION PETITION

Subject

The competent Authority has examined and filed the application submitted by Constable Amjad Khan No. 2124 of Mardan Police against the punishment of dismissal from service awarded by DPO/Mardan, the order OB No. 739, dated 21.03.2022 being time barred. The applicant may please be informed accordingly.

(NOOR ACHHAN)
Registrar

For Inspector General of Police,
Khyber Pakhtunkhwa Peshawar

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

No. S/152 /22,

dated Peshawar the 18/7/2022

To,

The Regional Police Officer,
Mardan.

Subject: **REVISION PETITION.**

Memo.

The competent Authority has examined and filed the application submitted by Constable Amjid Khan No. 2124 of Mardan Police against the punishment of dismissal from 'service awarded by DPO/Mardan vide order OB No. 739, dated 21-03-2022, being time barred.

The applicant may please be informed accordingly.

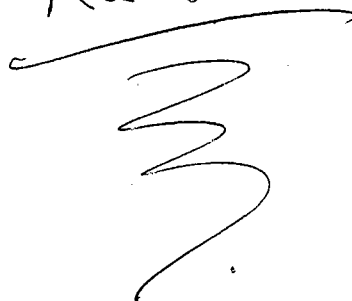
Sd/-

(NOOR AFGHAN)

Registrar

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Attested



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