

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**  
**AT CAMP COURT, ABBOTTABAD.**

Service Appeal No.11016/2020

Date of Institution ... 20.04.2020  
Date of Decision ... 19.09.2022

Suleman Shahzad S/O Shahzad Gill R/O Karimpura Tehsil & District  
Abbottabad.

... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Home &  
Tribal Affairs, Peshawar and three others.

... (Respondents)

Zulfiqar Ahmad,  
Advocate

... For appellant.

Muhammad Jan,  
District Attorney

... For respondents

Rozina Rehman  
Fareeha Paul

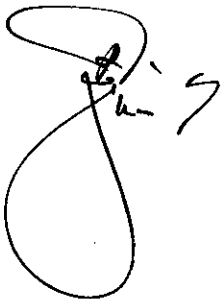
... Member (J)  
... Member (E)

JUDGMENT

Rozina Rehman, Member (J): The appellant has invoked the  
jurisdiction of this Tribunal through above titled appeal with the  
prayer as copied below:

**"On acceptance of instant service appeal, the impugned inquiry recommendations and the orders of Respondents No.2 & 3 may kindly be set aside and the appellant be restored in service from the date of dismissal and also penalty imposed upon appellant may also be set aside and any further proceedings in consequence of impugned order may also be set aside being unlawful and against the settled norms of justice".**

2. Brief facts of the case are that appellant was appointed as  
Constable in the Police Department on 16.09.2009 in District  
Abbottabad. He was issued charge sheet and statement of



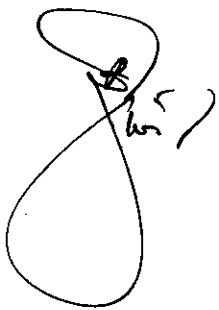
allegations for the alleged absence period on 19.02.2019 and accordingly, he was dismissed from service by Additional SP, Abbottabad. Feeling aggrieved, he filed departmental appeal which was rejected, hence the present service appeal.

3. We have heard Zulfiqar Ahmad, Advocate learned counsel for the appellant and Muhammad Jan, District Attorney for respondents and have gone through the record and the proceedings of the case in minute particulars.

4. Zulfiqar Ahmad Advocate, learned counsel for the appellant argued inter alia that the report of Inquiry officer and orders of the respondents No.2 & 3 are illegal, arbitrary, void and without lawful authority, hence, liable to be set aside. He contended that the illegal orders of the respondents No.2 & 3 have resulted in miscarriage of justice which amounts to abuse of process of law as Additional Superintendent of Police Abbottabad was not the competent authority who issued the impugned order of dismissal from service of the appellant, therefore, the said order is void ab-initio and liable to be set aside.

5. Conversely, learned District Attorney submitted that the appellant remained absent for 41 days without any permission or leave, hence, he was served with show cause notice and proper departmental inquiry was initiated against him. He produced false medical reports, therefore, he was awarded major punishment of dismissal from service after observance of all codal formalities.

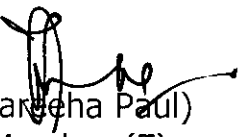
6. From the record it is evident that charge sheet with statement of allegations were issued to the appellant by one Sonia Shamroz

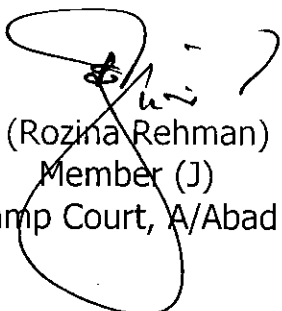


Khan Additional Superintendent of Police, Abbottabad who was not competent to issue the same and in view of the inquiry report, one Qamar Hayat Khan Additional Superintendent of Police Abbottabad awarded major punishment of dismissal from service to the appellant who was not competent authority to impose major punishment. Again, an illegal act was committed by issuing corrigendum in respect of the date of dismissal from service as well as the absence period of the appellant. This aspect of the case was not taken into consideration by the Regional Police Officer Hazara Region, Abbottabad who filed the appeal of the appellant by maintaining the order of incompetent authority. Infact, the order passed by the Additional SP is a void order and no limitation runs against the same.

7. Keeping in view the above discussion, we are left with no option but to accept this appeal by reinstating the appellant into service for the purpose of de-novo inquiry to be conducted within 60 days of the receipt of this judgment. Needless to mention that the appellant shall be afforded opportunity of hearing during the proceeding. The issue of back benefits shall be subject to the outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.  
19.09.2022

  
(Fariha Paul)  
Member (E)  
Camp Court, A/Abad

  
(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

ORDER  
19.09.2022

Appellant present through counsel.

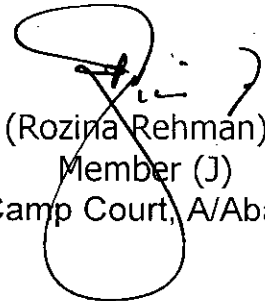
Muhammad Jan, learned District Attorney for respondents present. Arguments heard. Record perused.

Vide our detailed judgment of today of this Tribunal placed on file, we are left with no option but to accept this appeal by reinstating the appellant into service for the purpose of de-novo inquiry to be conducted within 60 days of the receipt of this judgment. Needless to mention that the appellant shall be afforded opportunity of hearing during the proceeding. The issue of back benefits shall be subject to the outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.  
19.09.2022



(Fareeha Paul)  
Member (E)  
Camp Court, A/Abad



(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

18<sup>th</sup> July 2022 Appellant in person present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Shamraiz Khan, ASI(Legal) for respondents present.

In this appeal Government of Khyber Pakhtunkhwa through Secretary Home and Tribal Affairs Peshawar has been arrayed as party whereas the same was neither necessary nor proper hence, deleted from the panel of respondents. Other respondents have submitted written reply/comments which is placed on file. A copy of the same is handed over to the appellant. To come up for arguments on 19.09.2022 before D.B at camp court Abbottabad.



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

From: The Dy: Superintendent of Police,  
Havelian.

To: The District Police Officer  
Abbottabad

No. 280 /Dated Havelian the 09-04-2019.

Subject: - DEPARTMENTAL ENQUIRY REPORT CONDUCTED  
AGAINST FC SULMAN NO. 671 OF POLICE LINES.

The undersigned has been directed to conduct departmental enquiry vide order No. 24-PA dated 19.02.2019 against FC Sulman No. 671, while posted at Police Lines Abbottabad.

**SUMMARY OF ALLEGATIONS.**

According to DD No. 20 dated 10.01.2019, you absented yourself with effect from 19.12.2018 to 10.01.2019, 11.01.2019 to 21.01.2019, 30.01.2019 to 06.02.2019, 12.12.2018 to 14.12.2018 (Total 41 days absence) without any leave / permission which tantamount to gross misconduct.

**PROCEEDINGS OF ENQUIRY.**

As directed the undersigned called the above said defaulter for the purpose of enquiry, who appeared before the undersigned after dozens of telephone calls and recorded his statement (copy attached).

FC Sulman No. 671 stated that during his posting at Police Lines Abbottabad on 19.12.2019, he fell down from motorcycle due to which he got serious injuries and his left ankle was fractured. The concerned Doctor advised him for medical bed rest but he could not inform higher authorities on time. According to the medical rest certificates only 28 days were recommended for the medical rest as subject constable remained absence from the place of duty for 41 days without any leave / permission. It was duty of the defaulter to inform the higher authorities, when he got injured or submits his medical bed rest certificate on time for approval but he failed to do so. On the other hand Doctor cannot recommend medical bed rest over then three days legally.

**FINDINGS OF ENQUIRY:**

- During the course of enquiry, it has been established that the injury of defaulter seems genuine one but defaulter failed to approve the medical rest from competent authority at the time of issuance.

OTC  
Call him in OR.

And  
Superintendent of

- 671
- On the other hand medical bed rest is consisting upon 28 days as period of absence is 41 days.
  - It was the duty of defaulter to send his medical rest certificates to concerned competent authority for approval, then he pass the concerned period of his medical bed rest at home but he failed.

**RECOMMENDATIONS:**

Keeping in view of above considered facts, the period of the absence of defaulter FC Sulman No. 671 may be treated as without pay including suitable minor punishment or as you deems appropriate fit.

Submitted please.

  
**Dy: Superintendent of Police  
Havelian.**

21.09.2021

Mr. Zulfiqar Ahmed, Advocate, for the appellant present.  
Preliminary arguments heard.

Points raised need consideration, hence, the appeal is admitted to regular hearing subject to all legal and valid objections. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments before the D.B on 20.12.2021 at Camp Court Abbottabad.

Appellant Deposited  
Security Process Fee

27/9/21

(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT ABBOTTABAD

20.12.2021

Clerk of learned counsel for the appellant present.  
Mr. Shamraiz Khan, ASI alongwith Mr. Riaz Ahmad Painsakhel, Assistant Advocate General for the respondents present and sought time for submission of reply/comments. Adjourned. To come up for written reply/comments on 14.02.2022 before the S.B at Camp Court Abbottabad.

(Salah-Ud-Din)  
Member (J)  
Camp Court Abbottabad

14-2-2022

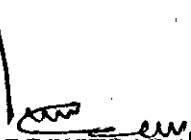


Due to retirement of the worthy  
chairman the case is adjourned. To  
come up for the same as before  
on 18-7-22, at camp court, Abbottabad.



## FORM OF ORDER SHEET

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

Case No. 11017 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/09/2020	<p>The appeal of Mr. Suleman Shahzad resubmitted today by Mr. Zulfiqar Ahmad 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</p>
2-	21-01-2021	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>21-01-2021</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to covid-19, case is adjourned to 21-9-21 for same.</p> <p style="text-align: right;"> Reader</p>


The appeal of Mr. Suleman Shahzad received today by post i.e. on 20.04.2020 through Zulfiqar Ahmad Advocate Abbottabad is incomplete on the following score which is returned to his counsel for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be annexurewise and flagged properly.
- 2- Annexures of the appeal may be attested by the appellant or his counsel.
- 3- Appeal may be placed in proper File cover.
- 4- six more copies of appeal along with annexure i.e. complete in all respect may also be placed on file.
- 5- In the heading of appeal the word 'petitioner' may be corrected as 'appellant.'

Two more  
copies are  
required.

No. 1022 /S.T,

Dt. 20-04 /2020

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.  
20/04/2020

Mr. Zulfiqar Ahmad Advocate, Abbottabad.

Sir ~~please find time~~  
computation all ~~objections~~  
~~resubmission~~ on ~~file~~  
Objection no. 4 is still stand  
The appeal in hand is returned again  
to the counsel for the appellant for  
completion & resubmission within 15 days.  
no 2561 /S.T  
dt. 02/09/2020  
Registrar

**BEFORE THE SERVICES TRIBUNAL KHYBER**  
**PUKHTUN KHWAPESHAWAR**

**SULEMAN SHAHZAD**

**VERSUS**

**Govt. of KPK & OTHERS**

=====


**SERVICE APPEAL**

**INDEX**

<i>S. No.</i>	<i>Description</i>	<i>Annexure</i>	<i>Pages</i>
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..... APPELLANT  
  
Through

Dated 31/03/2020

  
(ZULFIQAR AHMED)  
Advocate High Court  
Abbottabad

①

**BEFORE THE SERVICES TRIBUNAL KHYBER**  
**PUKHTUNKHWA, PESHAWAR**



*Suleman Shahzad S/O Shahzad Gill R/O Karimpura Tehsil &  
District Abbottabad Ex- Constable No. 671.*

... APPELLANT

**VERSUS**

- 1 *Govt. of KPK through secretary Home & TA, Peshawar.*
- 2 *Regional Police Officer, Hazara Division Abbottabad.*
- 3 *Additional SP, Abbottabad.*
- 4 *DSP, Havelian District Abbottabad.*

...RESPONDENTS

=====

**Filed to-day**  
**Registrar**  
20/4/2020

**APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER OF RESPONDENT # 3 DATED 01/10/2019 WHEREBY THE <sup>APPELLANT</sup> PETITIONER WAS DISMISSED FROM SERVICE AS WELL AS THE ORDER OF RESPONDENT # 2 WHEREBY DEPARTMENTAL APPEAL WAS REFUSED IS WITHOUT ANY PLAUSABLE EXPLANATION ILLEGAL, VOID WITHOUT LAWFUL AUTHORITY, WITHOUT JURISDICTION AND SAME IS NOT TENABLE IN THE EYES OF LAW AND ARE LIABLE TO BE SET ASIDE.**

REG-SUBMITTED TO -DAY AND FILED.

REGISTRAR  
17/9/2020

**PRAYER:- ON ACCEPTANCE OF INSTANT APPEAL, THE IMPUGNED INQUIRY RECOMMENDATIONS AND THE ORDERS OF RESPONDENT NO 2 & 3 MAY KINDLY BE SET ASIDE AND THE APPELLANT RESTORED IN SERVICE FROM THE DATE OF DISMISSAL AND ALSO PENALTY IMPOSED UPON THE APPELLANT MAY ALSO BE SET ASIDE AND ANY FURTHER PROCEEDINGS IN CONSEQUENCE OF IMPUGNED ORDER MAY ALSO BE SET ASIDE BEING UNLAWFUL AND AGAINST THE SETTLED NORMS OF JUSTICE.**

---

*Respectfully Sheweth; -*

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

**FACTS:-**

- 1. That the appellant was appointed in the police department as constable on 16/09/2009 in District Abbottabad.*
- 2. That during the posting at various stations the dignity of the department was given priority and performance to this effect has invited the officers of the police department to recognize the services of the appellant.*

3. That on 19/02/2019 the appellant was issued charge sheet and statement of allegations for the alleged absence period given in it. (Copy of charge sheet and statement of allegations are attached as annexure "A" & "B").
4. That the disciplinary proceedings were initiated by the Addl: SP, Abbottabad by appointed DSP, Havelian as inquiry officer.
5. That thereafter vide OB NO. 216 dated 01/10/2019 the appellant was dismissed from service for the alleged absence period and the order was passed by Addl: SP, Abbottabad also corrigendum issued showing the date of dismissal of appellant as 11/09/2019. (Copy of order and corrigendum is attached as "C" & "D").
6. That feeling aggrieved departmental appeal was lodged before RPO, Hazara, Abbottabad on 29/10/2019, which was also dismissed / rejected on 13/03/2020. (Copy of appeal and the order thereon are attached as "E" & "F").

That the impugned order of respondent No 2 & 3 are liable to be set aside inter – alia on the following grounds:-

**GROUND S; -**

- a. That the report of inquiry officer respondent No. 4 and the orders of respondent # 2 & 3 are illegal

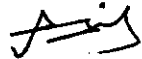
*arbitrary, void, without lawful authority and also without jurisdiction and hence liable to be set aside.*

- b. That patently orders of dismissal from service are illegal without lawful authority and result of misreading and non-reading.*
- c. That the illegal and without jurisdiction orders of respondents # 2 & 3 have resulted in mis-carriage of justice and amounted to abuse of process of law which has adversely effected the appellant by the un fair partial, un reasonable and discriminatory orders of respondent # 2 & 3 basing on the ex-parte recommendation passed by respondent No. 4.*
- d. That no proper inquiry was conducted by respondents even no right of cross examination was provided to the appellant and the impugned orders are passed in violation of the settled norms of justice also the appellant was punished twice as has already been penalized on the same period of absence.*
- e. That the appeal is within time and this Honorable tribunal has got jurisdiction in the matter.*
- f. That further points will be submitted at the time of arguments.*

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**PRAYER: \_**

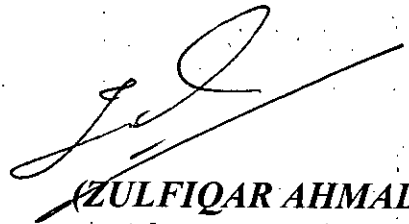
*It is therefore most humbly prayed that on acceptance of instant appeal, the impugned inquiry recommendations and impugned orders of respondent # 2 and 3 may kindly be set aside and the appellant reinstated in service with all back benefits under the law.*



...APPELLANT

Through

Dated: 31/03/2020



(ZULFIQAR AHMAD)  
Advocate High Court  
Abbottabad



**BEFORE THE SERVICES TRIBUNAL KHYBER**  
**PUKHTUNKHWA, PESHAWAR**

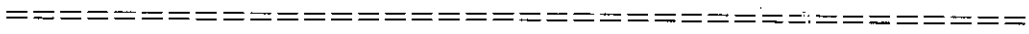
Suleman Shahzad

... APPELLANT

VERSUS

Govt. of KPK & Others

...RESPONDENTS



**APPEAL AGAINST DISMISSAL**

**AFFIDAVIT**

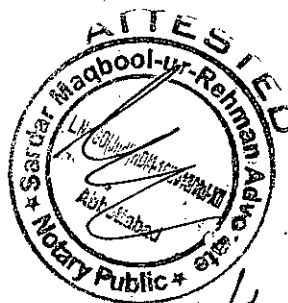
I, Suleman Shahzad S/O Shahzad Gill R/O Karimpura Tehsil & District Abbottabad, do hereby solemnly affirm and declare on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein. No such appeal is pending an any other court.

...DEPONENT

Dated 31/03/2020

Identified by: -

(ZULFIQAR AHMAD)  
Advocate High Court  
Abbottabad



14/4/20


(7)

A

Alim  
S. S. J.

CHARGE SHEET

- 1). I Sonia Shamroz (PSP) Addl: Superintendent of Police Abbottabad as competent authority hereby charge you Constable Suleman No.671 of Police Lines as explained in the attached statement of allegations.
- 2). You appear to be guilty of misconduct under Police Disciplinary Rules 1975, and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary Rules.
- 3). You are therefore, directed to submit your written defense within seven days on the receipt of this Charge Sheet in the Enquiry Officer.
- 4). Your written defense, if any shall reach the Enquiry Officer with in 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 or otherwise.
- 6). A statement of allegations is enclosed.

  
Sonia Shamroz Khan, PSP  
Addl: Superintendent of Police  
Abbottabad

8

B

Att. I  
L. Q.  
Adw

DISCIPLINARY ACTION

I Sonia Shamroz Khan (PSP) Addl: Superintendent of Police Abbottabad as Competent Authority of the opinion that you Constable Suleman No.671 of Police Lines rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975.

STATEMENT OF THE ALLEGATIONS

- 1). According to DD No.20 dated 10-01-2019 you absented himself w.e.f 19-12-2018 to 10-01-2019, (11-01-2019 to 21-01-2019) 30-01-2019 to 06-02-2019 and 12-12-2018 to 14-12-2018 (total absence: 41 days) without any leave/permission which tantamount to gross mis-conduct.
- 2). For the purpose of scrutinizing your conduct with reference to the above allegations, DSP Havelian Abbottabad is appointed as Enquiry Officer.
- 3). The Enquiry Officer shall in accordance with the provision of this ordinance, provide reasonable opportunity of hearing to the accused, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action the accused.
- 4). The accused a well conversant representative of departmental shall in the proceedings on the date, time and place fixed by the Enquiry Officer.

- SD -  
Sonia Shamroz Khan, PSP  
Addl: Superintendent of Police  
Abbottabad

No: 24 /PA, Dated Abbottabad the 19 /02/2019.

- CC:
1. Delinquent official, with the direction to submit his defense within 07 days of the receipt of this statement of allegations and also to appear before the Enquiry Officer of the date, time and place fixed for the purpose of departmental proceedings.
  2. Enquiry officer to complete departmental enquiry with in stipulated period.

\*\*\*\*\*

9

C  
Mithal  
Adani

**ORDER**

This office order will dispose of the departmental enquiry against Constable Suleman Shahzad No. 671. According to the DD No. 20 dated 10-01-2019 he absented himself w.c.f., 19-12-2018 to 10-01-2019, 11-01-2019 to 21-01-2019, 30-01-2019 to 06-02-2019 and 12-12-2018 to 14-12-2018 (total absence 41 days) without any leave or permission. An inquiry in the matter was marked to DSP, Havelian where he presented bogus medical reports which was verified by the concerned MS. This practice shows that he has nothing in his defence and indulge illegal activity for preparation of bogus documents.

He was issued Charge Sheet and statement of allegations. Mr. Shamriaz Khan SDPO Havelian was appointed as Enquiry Officer. He conducted proper departmental enquiry against the delinquent officer and recorded statements of all concerned. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings, wherein allegations have been proved against him. Consequently he was issued Final Show Cause Notice. He was summoned to appear before the undersigned on 01-10-2019 but he failed to appear before the undersigned.

Therefore, in exercise of the powers vested in the undersigned Police Disciplinary Rules-1975 (Amended 2014), I, Qamar Hayat Khan, Additional Superintendent of Police Abbottabad as a competent authority, am constrained to award him the punishment of Dismissal from service from the date of absence with immediate effect.

Order announced.

Add: Superintendent of Police,  
Abbottabad

OB 210 216  
1-10-19

10

D

Handwritten signature/initials

**CORRIGENDUM**

This office OB No.216 dated 01-10-2019 so far relates to the dismissal order of Constable Suleman Shahzad No.671 in which his absence period w.e.from 10-01-2019 to 21-01-2019 and 30-01-2019 to 06-02-2019 (Total absence 15 days) is hereby withdrawan and his absence period w.e.from 29-06-2019 to 01-07-2019, 02-07-2019 to 11-07-2019 12-07-2019 to 16-07-2019 (Absence Period 17 days), 16-07-2019 to 28-08-2019 (absence period 44 days) and 11-09-2019 to till date. The above absence period may be treated as Leave without pay and his dismissal order may be considered w.e.from 11-09-2019 from the date of last absence.

Handwritten signature  
Addl: Superintendent of Police  
Abbottabad

OB NO 216

1-10-19

To

The Regional Police Officer,  
Abbottabad.

Subject: DEPARTMENTAL APPEAL

Dear Sir,

With due respect I very humbly submit the following few lines for your kind consideration & sympathetic action with regard to the order of dismissal of the appellant passed by Additional SP Abbottabad vide OB No. 216 dated 01-10-2019.


In this respect I may be allowed to submit that the period of alleged absence mentioned in the dismissal order was probed into through inquiry officer and basing on the report of the inquiry officer, punishment of dismissal from service was awarded for the same period which at the time of inquiry proceeding was sufficient explained by the appellant.

That a corrigendum issued by the authority / Additional SP Abbottabad whereby the period of absence mentioned in the dismissal order was withdrawn with substitution of some new period its-self speaks that the inquiry conducted and decision announced was related to the alleged absence period mentioned in the charge sheet and show cause notice etc while no inquiry or findings are available against the appellant and that the decision

arrived at was not about corrigendum period so the order of dismissal passed carries no legal weight under the law as no hearing or right of cross examination and right of defence was afforded to the appellant with regard to the alleged corrigendum period.

It is therefore most humbly prayed that as the inquiry conducted and the decision announced is totally illegal and it is therefore prayed that by accepting the appeal, the order of dismissal of the appellate may very kindly be set-aside with restoration of his service / reinstatement of the appellant with all back benefits.

Thanking you,



Suleman Shahzad No. 671

Dated: 29-10-2019



Muzes  
Aad

13

F

OFFICE OF THE REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.rpohazara@gmail.com

0345-9560687

NO: 7963 /PA DATED 13/03/2020

**ORDER**

This order will dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex. Constable Suleman Shehzad No.671 of District Abbottabad against the order of punishment i.e. *Dismissal from service (3<sup>rd</sup> time)* awarded by Addl: SP, Abbottabad vide OB No.216 dated 01.10.2019.

Brief facts leading to the punishment are that the official absented himself w.e.f 11.09.2019 till date of dismissal i.e. 01.10.2019 vide OB No.216 (21 days) and also presented bogus/fake medical reports.

The appellant was issued Charge Sheet alongwith summary of allegations and SDPO Havelian was deputed to conduct departmental enquiry. The EO recommended him for suitable punishment. The appellant was issued with final show cause notice and called in OR but he failed to appear in OR. Keeping in view the above Addl: SP Abbottabad awarded him major punishment of dismissal from service.

After receiving his appeal, comments of DPO Abbottabad were obtained and examined/perused. The undersigned called the official in OR and heard him in person. Perusal of his service record transpires that appellant is a habitual absentee and dismissed from service 3<sup>th</sup> time which shows lack of interest in official duty. Therefore in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 appeal of the official is hereby *filed* with immediate effect..

Qazi Jamil ur Rehman (PSP)  
Regional Police Officer  
Hazara Region, Abbottabad

No. 7964 /PA, dated Abbottabad the 13-03 2020.

CC.

1. The District Police Officer, Abbottabad for information and necessary action with reference to his office Memo No 32/Legal, dated 03-01-2020. Service Roll and Fuji Missal containing enquiry file of the appellant is returned herewith for record.



# وکالت نامہ

کورٹ فیس

بعدالت  
عنوان: سلیمان سہزاد بنام گورنمنٹ

منجانب: Appealant

نوعیت مقدمہ: سپریم کورٹ

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام  
ذوالفقار احمد رائڈر لکھنؤ پانچویں کورٹ  
کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل  
صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری  
کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت  
ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی  
بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا  
ساختمہ پر داختمہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ دہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے  
مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا  
حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں  
کوئی جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد  
استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔  
لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 31/03/2020

بمقام: ایبٹ آباد

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA, SERVICE  
TRIBUNAL PESHAWAR CAMP COURT, ABBOTTABAD.**

**SERVICE APPEAL NO. 7620/2021.**

Suleman Shahzad son of Shahzad Gill R/O Karimpura Tehsil & District Abbottabad ex-constable No. 671.

... APPELLANT.

**VERSUS**


1. Government of KPK through Secretary Home and TA, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. Additional SP, Abbottabad.
4. DSP, Havelian District Abbottabad.

... RESPONDENTS.

**Para wise comments on behalf of Respondents.**

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2	Affidavit	-	3
3	Copies of Daily Diary reports	"A"	4 to 11
4	Copy of bogus Medical report	"B"	12
<b>TOTAL</b>			<b>12 Pages</b>

  
DSP Legal, Abbottabad.

①

P-①

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA, SERVICE  
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**SERVICE APPEAL NO. 11016/2020.**

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...APPELLANT.

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2. Regional Police Officer, Hazara Region, Abbottabad.
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**The Para-Wise Comments by Respondents.**

Respectfully Sheweth.

The para-wise comments on behalf of respondents are submitted as under:-

**PRELIMINARY OBJECTIONS:-**

1. That the instant Service Appeal is not maintainable in the present form.
2. That the appellant is estopped by his own conduct.
3. That the appellant has not come to the Honorable Tribunal with clean hands.
4. That the appellant has suppressed the material facts from the Honorable Tribunal.
5. That the instant Service Appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
6. That the order passed by the authorities are based on facts & rules, after fulfilling all the codal formalities, hence, the appeal is liable to be dismissed without any further proceeding.

**ON FACTS:-**

1. Pertains to the record.
2. Pertains to the record.
3. The appellant remained absent vide DD No. 20 dated 10.01.2019, from 19.12.2018 to 10.01.2019, 11.01.2019 to 21.01.2019, 30.01.2019 to 06.02.2019 and 12.12.2018 to 14.12.2018 (Total 41 days) without any permission or leave. Hence, served with showcause notice (Copies of DD reports are annexed as annexure "A").
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5. That the appellant during enquiry instead of submitting plausible explanation in respect of his absence period, produced fake medical reports as verified by concerned MS. He was found guilty and awarded punishment i.e Dismissal from Service. (Copy of the bogus medical reports duly verified by MS is annexed as annexure "B").

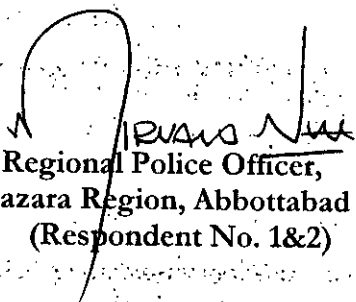
6. That the appellate authority heard him in person, also thoroughly examined the comments/ service record of the appellant and found him habitual absentee. He had been awarded major punishment of dismissal from service 03 times. Furthermore, he could not furnish plausible explanation in his defense. Hence his appeal was rejected.

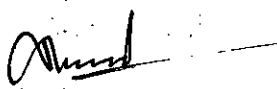
**GROUND.**

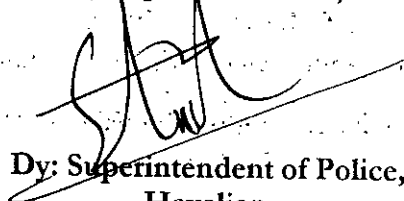
- a. That the proper enquiry has been conducted and order in accordance with law has been passed thereof.
- b. That the dismissal order of the appellant has been passed after observing all legal formalities.
- c. That the order of dismissal has been passed in accordance with law and rules no prejudice has been caused to the appellant.
- d. That he was served with show cause notice, enquiry officer approved him guilty after proper departmental enquiry. He has been awarded punishment consecrated to charge in accordance with the law/rules.
- e. The appeal of the appellant is not maintainable and liable to be dismissed.

**PRAYER:-**

In view of above stated facts, it is most humbly prayed that the instant service appeal does not hold any legal force, may kindly be dismissed with costs, please.

  
Regional Police Officer,  
Hazara Region, Abbottabad  
(Respondent No. 1&2)

  
Addl. Superintendent of Police,  
Abbottabad.  
(Respondent No. 3)

  
Dy. Superintendent of Police,  
Havelian.  
(Respondent No. 4)

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE  
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...**APPELLANT:**

**VERSUS**

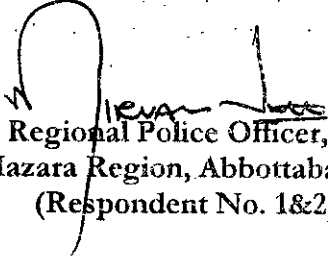
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...**RESPONDENTS.**

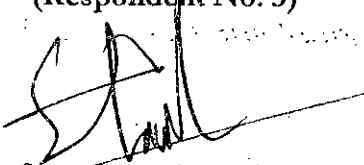
**AFFIDAVIT:**

We, do hereby affirm on oath that the contents of written reply are true to the best of our knowledge & belief and nothing has been concealed from the honorable Service Tribunal.

Submitted please.

  
 Regional Police Officer,  
 Hazara Region, Abbottabad  
 (Respondent No. 1&2)

  
 Addl: Superintendent of Police,  
 Abbottabad.  
 (Respondent No. 3)

  
 Dy: Superintendent of Police,  
 Havelian.  
 (Respondent No. 4)

671

فصل وارے سے روزانہ 19/18

مدیر حاضر کا نام 19/18  
ممبر حاضر کا نام 19/18  
حاضر حاضر کا نام 19/18  
روزانہ 19/18

محمد علی  
فصل وارے سے

PA = 1554 - Charge Sheet  
Add - SP. AID

19 - 12/18	مقامی
10 - 1/19	مقامی
11 - 1/19	مقامی
21 - 1/19	مقامی
30 - 1/19	مقامی
6 - 2/19	مقامی
12 - 12/18	مقامی
14 - 12/18	مقامی

مل برطانیہ 41 نومبر

(5)

پدرش

(5) پولیس لائن

(517) (671)

ضلع اسلام آباد

نقل دہشت گرد 11 روزنامی 19-12-18

عد 11 رپورٹ غیر جانبداری 19-12-18 وقت 08:35 بجے رپورٹ میں حالتی ملازمان کی

سببیں عبدالقدیر 517، سلیمان 671۔ عدم موجودگی کے تحت جنکی رپورٹ

غیر جانبداری درج روزنامی ایب نقل دہشت گردی کے سربراہان

مال کی خدمت میں ارسال ہوگی

Sig

Forwarded PL

Lo IATD  
21-12-18

Pay STOP

PL

Add SPATM

جانا۔ عالی

نقل سہ ماہی اعلیٰ

(S)

m m police line ATD  
21-12-2018

Sig

Forwarded PL

RI/Line Abbottabad  
Date 21-12-18

(Signature)

CRB No 345

20-12-18

پولیس

کے ڈپارٹمنٹ نمبر 43 روزنامہ 11-01-19

نمبر 43 کے ڈپارٹمنٹ نمبر 11-01-19 کے وقت 1945ء کے وقت خالصی ملازمان کیلئے

ذیل ملازمان: عمال 466، شہر 1239، واحد برقی 507، والی 710، عمال 280

اصدق شاہ 755، لیاقت 843، ذکیان 855، عاطف 1255، سہیل 1280

سید 1346، سجاد 709، شیر بہادر 508، انیس 862، نصر 1211

سلمان شہزاد 671، حکیم موجود پانے کے چھٹی پورٹ نمبر 43 روزنامہ

کا عہدہ لیزل مندرجہ بالا ملازمان ڈپنٹی حذوف کر دی گئے ہیں

اور عملی رول کمال میں غیر حاضر ہوتے ہیں ان کے بارے میں کوئی بھی

کئی دفعہ ڈپارٹمنٹ نمبر 43 کے ملازمان کو اطلاع دی گئی ہے۔ جو اس دفعہ دوبارہ

ڈپارٹمنٹ نمبر 43 کے ملازمان کو بارے میں خبرت میں ارسال ہوگی۔ ڈپارٹمنٹ

عملی ہے تم

مناب عالی

کے ڈپارٹمنٹ نمبر 43

17

MHC Police - 2mc ATD

14-01-2019

Six Forwarded Plz

RI/Line Abbottabad  
Date: 14-1-2019

OB No 16

28-1-19

Pay STOP

PK

Att: SP, ATD

Handwritten signature



لکھنؤ دہلی 33 اور ناٹھ 21/19

33 حافری مہاراجہ 21/19 وین 17.15 بجے اسٹیشن سلیمان سے  
حکومت سندھ حافری مہاراجہ 33 اور ناٹھ 21/19 حافری آریا بیانی تھوڑے  
مسائل ہی وجہ سے نہ آسکا اور حافری آریا بیانی کی طرف سے  
گفتہ مذکورہ کی حافری مہاراجہ اور ناٹھ کیسے کیسے سے نقل  
ایک ایسا دور ہے کہ اگر ان کے پاس کوئی چیز ہے

صالح

ذکر علی

AA

12-2-4

AA

8

پوسٹ آفس 1446 671  
نقذرت ورد 13 روزنامہ 30/1/19  
671/1446

صدر رپورٹ غیر جامی 30/1/19 وقت 08:50 بج رپورٹ عدیم فانی ملازمان کی کمی  
ذیل ملازمان عمران 1138/50، عبدالقادر 1446، سلمان شہزاد  
حصول عدم موجود پانے کے جسکی رپورٹ غیر جامی حوزہ روزنامہ  
نقذرت علیحدہ سرورن رپورٹ ملازمان باہر کی شہادت میں ارسال ہوگی

Pay Stop Fe. 1446-671

U Khan  
Add. SP. AB

صاحب عالی  
نقل مطابق اصل

Amir  
Amir. p. line. ATD  
31-01-19

Sis, forwarded  
[Signature]

Lo - p. line - ATD  
31-01-19

Sis, forwarded RZ

[Signature]  
an  
01-02-19

[Signature]

OB. 2/0. 28  
6. 2 - 18

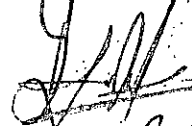
صلوات

کی لیس لائی

نقل دینے پر 400 روپے 2/17/06

وہا حافر کا 10 2/17/06 وقت 3:30 بجے اس وقت شیل سلیمان شہزاد  
عبدالغفور شہزاد کے والد نے 13 روپے 1/17/06 حافر آیا یہاں ہی ہوا کہ بیمار تھا صحت سے  
خبر حافر ہو گیا ان حافر آیا یہوں حافر کا ہی طور ہے اس سے کھانا کھانے کا حافر کا درج  
کروڑ نا ہی یہاں سے نقل دینے کیلئے صرف سو روپے اضران نالائی طرفت سے وصول ہوئی

ضابطہ  
نقل و حرکت

  
M. P. L. A. D.  
2012-2-19



صلح ایس

(671)

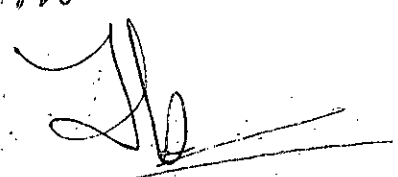
(10)

(10) لوہی لائن

نقل ریٹ مد 7 روز نامی 12 <sup>12</sup>/<sub>18</sub>

مد 7 رپورٹ غیر حاضرین 12 <sup>12</sup>/<sub>18</sub> 12 وقت 08:10 بجے رپورٹ ہوئے مگر فالتی ملازمان  
کیوں کہ حسین ذیل ملازمان علی رضا، 834/5، سلمان، 671، ارشد  
پہل 346 عدم موجود پائے گئے جنکی رپورٹ غیر حاضرین درج روز نامی  
پے نقل ریٹ علیہ عربیہ ہو کر اصران بالا کہ خدمت میں ارسال ہوگی

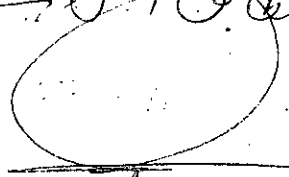
Sir  
Forwarded PL



Howel  
13-12-18

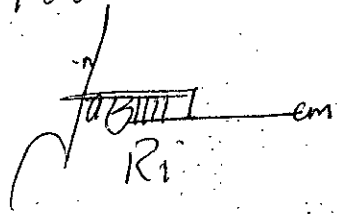
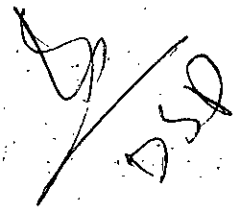
جناب عالی

نقل ریٹ ایس



mm p line - A To  
13 - 12 - 18

Sir Forwarded PL

  
Ri

(11)

پولیس سنس

(11)

نقل ریٹ مد 39 روز تا 14<sup>13</sup>/<sub>18</sub>

39 مد حاضر کا 14<sup>13</sup>/<sub>18</sub> وقت 15:00 سے اس وقت سلیاں لا کر غیر حاضر  
 بحوالہ مد 7 روز تا 14<sup>13</sup>/<sub>18</sub> حاضر آنا بیباں آتی ہیں بیمار تھا طبی وجہ سے ہر آٹھ  
 غیر حاضر ہو گیا اب حاضر آنا ہی نہیں حاضر کا ہی جامعہ و منتقلی انگریز کا صوبہ  
 گفٹہ مذکورہ کی حاضر کا درجہ روز تا 14<sup>13</sup>/<sub>18</sub> نقل ریٹ بلکہ وقت ہر آٹھ  
 افسران یاد کی خدمت میں ارسال ہو گا

جناب عالی

نقل عملاتی اہل ہے

M.M. Police Line And

14-03-2019

(12)

# AYUB TEACHING HOSPITAL ABBOTTABAD

Annexure "B"

(12)

## FILTER OUT PATIENT DEPARTMENT

S. Code No: _____	Book No: _____
Patient Name: <b>SULIMAN SHAHZAD</b>	M.R No: <b>K0400002358962</b>
Patient Sex: <b>MALE</b>	Patient Yearly No: <b>20000005</b>
Patient Age: <b>27 YEARS</b>	Date & Time: <b>31 JAN 2019 15:20:10</b>
Address: _____	O.P.D: _____
Amount: <b>10.</b>	Computer Operator: _____

BP = 110/70 mmHg  
Temp = 101°F



High grade fever  
Anorexia 2-3 days

Inj Provex 4v stat  
Inj Oxidol 4vx 30 for 3 days  
Inj ofsal 500ml 1vx 0'0

*Sham*

R

- Cap Caricef 400mg  
q 10 x 10

- Cal Panadol 325mg  
Tid x 1

- 2MP Fres 0.1%  
no 20 2-2-2

- Cap Neseck 100mg

*Handwritten note in margin*

Advanced Comp heat

Bed rest for 1 week

*Sham*  
Medical Officer  
Ayub Teaching Hospital  
Abbottabad

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA, SERVICE  
TRIBUNAL PESHAWAR CAMP COURT, ABBOTTABAD.**

**SERVICE APPEAL NO. 7620/2021.**

Suleman Shahzad son of Shahzad Gill R/O Karimpura, Tehsil & District Abbottabad ex-constable No. 671.

**APPELLANT.**

**VERSUS**

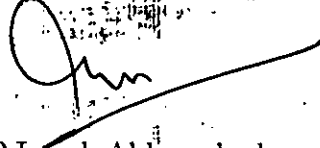
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DSP Legal, Abbottabad.

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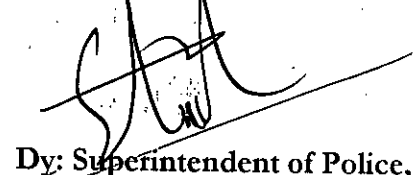
- a. That the proper enquiry has been conducted and order in accordance with law has been passed thereof.
- b. That the dismissal order of the appellant has been passed after observing all legal formalities.
- c. That the order of dismissal has been passed in accordance with law and rules no prejudice has been caused to the appellant.
- d. That he was served with show cause notice, enquiry officer approved him guilty after proper departmental enquiry. He has been awarded punishment consecrated to charge in accordance with the law/rules.
- e. The appeal of the appellant is not maintainable and liable to be dismissed.

**PRAYER:-**

In view of above stated facts, it is most humbly prayed that the instant service appeal does not hold any legal force, may kindly be dismissed with costs, please.

  
Regional Police Officer,  
Hazara Region, Abbottabad  
(Respondent No. 1&2)

  
Addl: Superintendent of Police,  
Abbottabad.  
(Respondent No. 3)

  
Dy: Superintendent of Police,  
Havelian.  
(Respondent No. 4)

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR CAMP COURT ABBOTTABAD**

**SERVICE APPEAL NO. 11016/2020.**

Suleman Shahzad son of Shahzad Gill R/O Karimpura Tehsil & District Abbottabad ex-constable No. 671.

...APPELLANT.

**VERSUS**

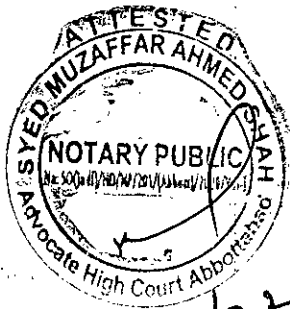
1. Government of KPK through Secretary Home and TA, Peshawar.
2. Regional Police Officer, Hazara Region, Abbottabad.
3. Additional SP, Abbottabad.
4. DSP, Havelian District Abbottabad.

...RESPONDENTS.

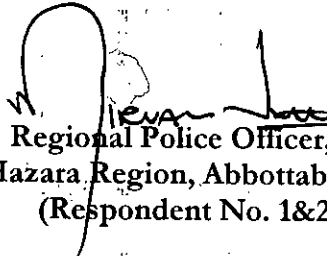
**AFFIDAVIT.**

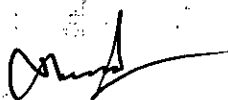
We, do hereby affirm on oath that the contents of written reply are true to the best of our knowledge & belief and nothing has been concealed from the honorable Service Tribunal.

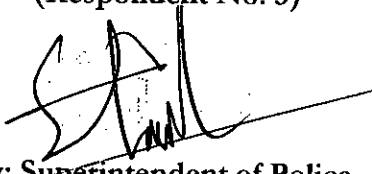
Submitted please.



18/7/22

  
 Regional Police Officer,  
 Hazara Region, Abbottabad  
 (Respondent No. 1&2)

  
 Addl: Superintendent of Police,  
 Abbottabad.  
 (Respondent No. 3)

  
 Dy: Superintendent of Police,  
 Havelian.  
 (Respondent No. 4)

(671)

نقل و اپیک فرم روزنامہ ~~10/11/19~~

علم و حاضری 20/1/19 1/19 1 صفحہ 3: 5: 1 بجے اللہ تعالیٰ کی شہادت سے  
 شہید حاضری شدہ بحوالہ 11 روزنامہ ~~10/11/19~~ ہوا فرمایا گیا بیانیہ ہوا کہ  
 غیر صفات کیلئے کراچی میں ہوا تھا جسکی وجہ سے غیر حاضری ہوئی  
 حاضری سے پہلے حاضری کی حاجت اور دستخط اور ہوا کہ سب گھنٹہ مذکورہ کی حاضری  
 روزنامہ کی نیابت سے نقل رہی علیحدہ درجہ ہوا اور ان کی طرف سے ارسال ہوئی

نقل و اپیک فرم

[Handwritten signatures and initials]  
 2-2-18

29 نوم	[	19- $\frac{12}{18}$	غیر حاضری
		10- $\frac{1}{19}$	حاضری
10 نوم	[	11- $\frac{1}{19}$	غیر حاضری
		21- $\frac{1}{19}$	حاضری
07 نوم	[	30- $\frac{1}{19}$	غیر حاضری
		6- $\frac{2}{19}$	حاضری
02 نوم	[	12- $\frac{12}{18}$	غیر حاضری
		14- $\frac{12}{18}$	حاضری

PA = ISSU. Charge sheet

||  $\phi$  K  
 Add - SP. ATD

بل نمبر 41 نوم 2-2-18  
 [Handwritten signature and initials]

پولیس لان

5

مدریس

671 517

منع اس

نقل دہشت گرد دوزخانی 19/12/18

مد 11 رپورٹ غنیر چاغتری Lo 12/18 19 وقت 08:35 بجے رپورٹ میں مالی ملازمان کی  
صہیں عبدالقدیر 517، سلیمان 671 ظم موجود پائے گئے جنکی رپورٹ  
غنیر چاغتری درج دوزخانی سے نقل دہشت گرد صہیں سرگراضران  
بالا کا خدمت میں ارسال ہوگی

Sigs

Forwarded PL

[Signature]

Lo IATD  
21-12-18

Pay STOP

PK

Add: SPATB

جنا - مالی  
نقل بمطابق اصل سے

[Signature]

m.m. police line ATD  
21-12-2018

Sigs

Forwarded PL

[Signature]

R/L: Albottabad  
Date: 21-12-18

[Signature]

ATD - 345  
28-12-18

تذکرہ

14-1-19

نقذیر پٹ 43 روزنامہ

مد 43 رپورٹ علیہ جعفری علیہ 11/19 وقت 1945ء اس وقت قاتلی ملزمان کینگی  
 ذیل ملزمان، عامل 466، شبیر 1239، واجہ علی 507، والی 710، عدیل  
 اخذق شاہ 755، لیاقت 843، ذکیان 855، عاطف 1255، پیل 130  
 تیمور 1346، سجاد 709، شبیر یادو 508، انیس 362، نصر 1211  
 سلمان شہزاد 671 حکم موجود پانچ کے چینی رپورٹ علیہ جعفری روزنامہ  
 یہ مقدمہ ازلیں مقدمہ بابا ملزمان ڈپنٹی حذرف ورڈی کے ہیں  
 اس پر رول کال میں علیہ جعفری ہوتے ہیں افران بابا کو اس سے پہلے ہی  
 ہی دفعہ نقذیر پٹ علیہ جعفری ملزمان بھائی ٹی جے - جو اس دفعہ دوبارہ  
 رپورٹ علیہ جعفری افران بابا کی خدمت میں ارسال ہوگی۔ رپورٹ  
 عرض ہے تم

ضیاء علی

نقل مطابق ہے

77

MHL Police Line ATD

14-01-2019

Six Forwarded Plz

173111  
 R/Line Abbottabad  
 Date 14-1-2019

OB NO - 4

28-1-19

Pay stop

PK

ADD SP ATD

Handwritten signature

لقلہ دیکھ جا 33 روز نامہ

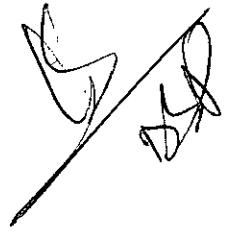
33 صافری M.L.H. 2/19 وقت 17:15 سے اس وقت سلمان  
صطل سفیر صافری شہر جو الہ 33 روز نامہ صافری ایبیا بی بی پورہ گوپلو  
صافری کی وجہ سے نہ آسکا اس صافری ایبیا بی بی پورہ کی طرف (الہ دستخط لکھ کر صافری  
گفتہ مذکورہ صافری صافری روز نامہ ایبیا بی بی پورہ ایبیا بی بی پورہ ایبیا بی بی پورہ

ص علی

ص علی

ص علی

12-2-4



(8)

پوسٹیشن 1446

671 نظریہ ورد 13 روزہ 30/1/18

ذیل ملازمین کے بارے میں رپورٹ جمع 30/1/19 وقت 08:50 بج رپورٹ جمع فانی ملازمان کیلئے  
ذیل ملازمان عمران (138/150)، عبدالقادر (1446/1446)، سلمان شہزاد  
صوبہ ملتان، قومی پرائمری اسکول، قومی پرائمری اسکول، روزانہ  
نظریہ ورد جمع 30/1/19

Pay Stop Fe 1446-671

Address AB

جناب عالی  
نقل و مطابقت کے لئے

Qasbi

Amilk. p. line ATD  
31-01-09

Sis, forwarded  
[Signature]

Lo-p. line- ATD  
31-01-09

Sis, forwarded R13

[Signature]  
an  
01-02-19

[Signature]

OB No 28  
6-2-18

نقل دینے کے لئے 40 روز نامی 2/17/19

40 روز نامی کا 2/17/19 صفت 15:30 سے اس وقت تک سید سلیمان علیہ السلام  
عند حاضر شدہ بحوالہ 13 روز نامی 2/17/19 حاضر آیا یہاں ہوا کہ بیار تھا جس سے  
نہی حاضر ہو گئے اب حاضر آیا ہوں حاضر کی جاوے اور اس وقت صبح گفندہ مذکورہ کی حاضر تاراج  
40 روز نامی یہاں سے نقل دینے کے لئے صبح سویرا حاضر ان کے لئے اس وقت صبح سویرا سے

ضابطہ عالی  
نقل دینے کے لئے  
2/17/19  
M. P. L. A. D.  
20-12-2-19



(10) لوہی لائن

(10)

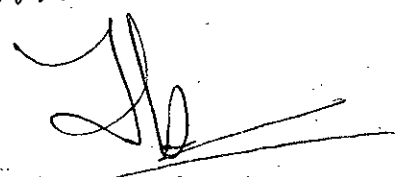
(671)

ضلع ایبٹ آباد

نقل ریٹ عدد 7 روزنامی 12/18/18

عدد 7 رپورٹ غیر حاضرین 12/18/18 12:10 وقت 08:10 بجے رپورٹ میں مکمل ملازمت  
کیگے جس میں ذیل ملازمان علی رضا، 834، سلیمان، 671، ارشد، 9  
سہیل 346 عدم موجود پائے گئے جنکی رپورٹ غیر حاضرین درج ذیل روزنامی  
یہ نقل ریٹ علاوہ صرف ہو کر اضران یا لاکھ خدمت میں ارسال ہوگی

Sir  
Forwarded PL

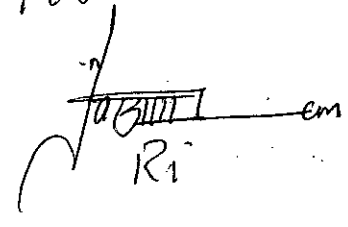
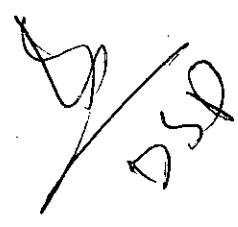


10/11/18  
13-12-18

جناب عالی  
نقل ریٹ لائن اعلیٰ سے

mm. p. line - A To  
13 - 12 - 18

Sir Forwarded PL

  
Ri

نقل ریٹ مد 39 روزنامہ 14/18

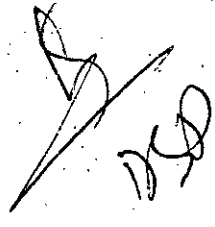
مد 39 حاضر کا 14/18 وقت 15:00 سے اس وقت سلیما کا 6 غیر حاضر تھے  
 بحوالہ مد 7 روزنامہ 14/18 حاضر آنا بیسای کیا گیا بیمار تھا جسی وجہ سے اس کا  
 غیر حاضر ہو گیا اب حاضر آنا بیسای حاضر کا ہی جامع و متنوع انگریز کا صوبہ  
 گفٹہ مذکورہ ہی حاضر کا مد 7 روزنامہ ہے فٹل ریٹ بلکہ وقت ہرگز  
 افسران یا مد کی خدمت میں ارسال ہو گی

جناب عالی

نقل بمطابق اہل ریٹ



M.M. Police Line And  
14-02-2019



(12)

# AYUB TEACHING HOSPITAL ABBOTTABAD

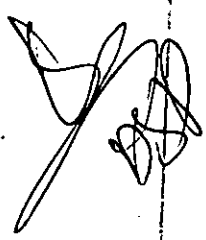
Annexure "B"

(12)

## FILTER OUT PATIENT DEPARTMENT

B.Code No:		Book No:	
Patient Name:	SULIMAN SHAHZAD	M.R No:	K0400002358962
Patient Sex:	MALE	Patient Yearly No:	20000005
Patient Age:	27 YEARS	Date & Time:	31 JAN 2019 15.20.10
Address:		O.P.D:	
Amount:	10,	Computer Operator:	

BP = 110/70 mmHg  
Temp = 101°F



High grade fever  
Anorexia 90 days  
Inf perivas yv stab  
Inf Oxidil 1g qwx 80  
for 03 days  
Inf ofsal 500mg 1wx 0'0

*Adnan*

- As
- CBE
  - Typhae dot
  - Urine R/E
  - MR

*Adnan*

- Cap Caricef 400mg  
q12 x 10
- Tab Paracetamol Extra  
Tetel
- 2ml Fres oxix  
no stat 2-2-22
- Cap Reserka 10mg

CR in 2019  
Advanced Complete  
Bed rest for 01 week

*Adnan*  
Medical Officer  
Ayub Teaching Hospital  
Abbottabad