

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**  
**AT CAMP COURT, D.I KHAN**

Service Appeal No. 4762/2021

Date of Institution ... 09.04.2021  
Date of Decision ... 27.10.2022

Syed Sajid Ali Shah son of Syed Irshad Hussain Shah caste Syed R/O Ijaz  
Abad Muryali Tehsil & District Dera Ismail Khan. Ex-Constable No.1856  
District Police D.I Khan, 2655 Elite Force Platoon No.99.

... (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa, through Secretary Home Khyber  
Pakhtunkhwa, Peshawar and five others.

... (Respondents)

Arif Ali Baloch  
Advocate,

... For appellant.

Muhammad Jan,  
District Attorney

... For respondents.

Kalim Arshad Khan ...  
Rozina Rehman ...

Chairman  
Member (J)

**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 the instant appeal, this worthy Tribunal may  
graciously be pleased to set-aside impugned order No.1143  
dated 16.03.2011 passed by the respondent No.2, declare such  
order as illegal, void and devoid of merits. Consequently,  
appellant may please be reinstated in service with all back  
benefits”.**

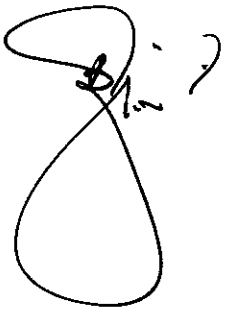
2. Brief facts of the case are that the appellant was inducted in Police  
Department as Constable (BS-05) on 27.07.2007. He served the Department

with great zeal and zest. He became the patient of sciatica in January 2020, and was unable to perform his duties. He was medically examined and remained under treatment w.e.f. 19.01.2020 to 06.08.2020. He was advised complete bedrest, therefore, he informed his high ups. It was on 29.09.2020, when he was informed about his removal from service. He then filed departmental appeal which was dismissed. He also filed mercy petition which was also dismissed, hence, the present service appeal.

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

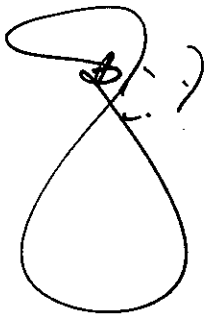
4. Arif Ali Baloch Advocate, learned counsel for the appellant inter-alia argued the impugned orders are against law, facts and norms of justice; that no inquiry was conducted as per law/rules. He contended that his entire medical record was not taken into consideration despite the fact that he was patient of sciatica and was unable to move.

5. Conversely, learned District Attorney submitted that performance of appellant during his service was not up to the mark which is evident from the bad entries recorded in his service record. He contended that his medical plea was also baseless as no such record was produced before the respondent Department. Lastly, he submitted that appellant remained absent from his lawful duty without prior permission w.e.f. 17.01.2020 to 21.07.2020 and 21.07.2020 to 29.09.2020. Charge sheet alongwith statement of allegations were issued to him and proper Inquiry Officer was appointed, where-after, final show cause notice was served upon him but



he failed to submit reply, therefore, notice was published in Daily "Mashriq" whereafter, he was dismissed from service after completion of all codal formalities.

6. After hearing the learned counsel for the parties and going through the record of the case with their assistance and after perusing the precedent cases cited before us, we are of the opinion that as per application of Incharge Platoon No.99, appellant remained absent from Police Line D.I.Khan without any leave or prior permission w.e.f. 19.01.2020 to 21.07.2020 and 21.07.2020 till the date of his dismissal from service i.e. 29.09.2020, therefore, chargesheet alongwith summary of allegations were issued on 16.03.2020 and one Yousaf Khan DSP Elite Force Khyber Pakhtunkhwa was appointed as Inquiry Officer. Appellant failed to appear before the inquiry officer, whereafter official show cause was issued on 26.06.2020 which was delivered to him through reader DSP Elite Force D.I.Khan which was received by appellant on 08.07.2020, but he failed to reply. Again in order to ensure his appearance a notice was published in Daily Mashriq on 05.08.2020 but he failed to resume his duty even after publication, therefore, major penalty of dismissal from service was imposed upon the him by Deputy Commandant Elite Force on 29.09.2020. He filed service appeal on 31.12.2020 which was dismissed being time barred by the Commandant Elite Force on 25.02.2020. He then filed revision on 28.02.2021 which was dismissed on 16.03.2021, whereafter he filed present service appeal. It is well-entrenched legal proposition that when an appeal before departmental authority is time barred, the appeal before Service Tribunal would be incompetent. In this regard reference can be made to cases titled



Anwarul Haq v. Federation of Pakistan reported in 1995 SCMR 1505, Chairman, PIAC v. Nasim Malik reported in PLD 1990 SC 951 and State Bank of Pakistan v. Khyber Zaman & others reported in 2004 SCMR 1426.

7. So far as his medical record in respect of Shitica is concerned, the same was never produced before the authority. Admittedly he did not submit any application for leave before the authority. Learned counsel badly failed to prove that the authority was properly informed by the appellant on mobile phone or by submission of written application. Admittedly, he remained absent for a long period without permission of the authority. Medical record in shape of discharge slip is available on file which shows date of admission as 26.02.2020 while the date of discharge has been mentioned as 30.02.2020. It is astonishing as to how 30<sup>th</sup> day was mentioned by the concerned Doctor in the month of February. His record is replete with bad entries. The authority properly informed him but he failed to attend his duty, therefore, he was rightly punished after completion of all codal formalities.

8. In view of the above discussion, we do not find any merit in the instant service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

Announced  
27.10.2022



(Kalim Arshad Khan)  
Chairman  
Camp Court D.I.Khan



(Rozina Rehman)  
Member (J)  
Camp Court D.I.Khan

**ORDER**

27.10.2022

Arif Ali Baloch, Advocate for appellant present.

Muhammad Jan, learned District Attorney for respondents present.

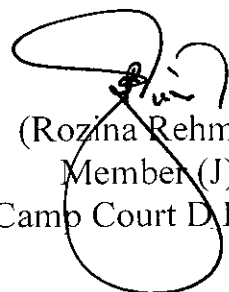
Vide our detailed judgment of today, containing 04 pages, we do not find any merit in the instant service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

Announced

27.10.2022



(Kalim Arshad Khan)  
Chairman  
Camp Court D.I.Khan

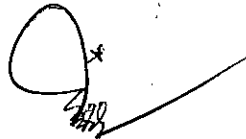


(Rozina Rehman)  
Member (J)  
Camp Court D.I.Khan

29.06.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondent submitted through office which is placed on file. Copy of the same is handed over to learned counsel for the appellant. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments before the D.B on 27.07.2022 at Camp Court, D.I. Khan.



(Mian Muhammad)  
Member (E)  
Camp Court, D.I.Khan



(Kalim Arshad Khan)  
Member (J)  
Camp Court, D.I.Khan

28<sup>th</sup> Sept 2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.

Learned counsel for the appellant submitted rejoinder which is placed on file. To come up for arguments on 27.10.2022 before D.B at camp court D.I.Khan.



(Salah Ud Din)  
Member(J)



(Kalim Arshad Khan)  
Chairman  
Camp Court D.I.Khan


25.01.2022

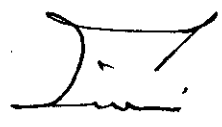
Tour is Cancelled, therefore, case is adjourned  
to 24.05.2022 for the same as before.

  
Reader.

24.05.2022

Appellant alongwith his counsel present. Mr. Farhaj Sikandar, District Attorney for the respondents present and sought time for submission of reply/comments. Several opportunities have been granted to the respondents for submission of reply/comments, therefore, last opportunity is given to the respondents for submission reply/comments on the next date positively, failing which their right for submission of reply/comments shall be deemed as struck off. Adjourned. To come up for submission of written reply/comments as well as arguments on 29.06.2022 before the D.B at Camp Court D.I.Khan.

  
(Rozina Rehman)  
Member (J)  
Camp Court D.I.Khan

  
(Salah-ud-Din)  
Member (J)  
Camp Court D.I.Khan

25.10.2021

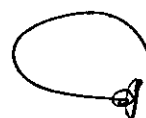
Counsel for the appellant present.

Mr. Muhammad Rasheed, Deputy District Attorney for respondents present.

Reply on behalf of respondents was not submitted. Learned Deputy District Attorney made a request for time to submit reply/comments; granted with direction to furnish the same within 10 days in office positively. If the written reply/comments are not submitted within stipulated time, the right of respondents for submission of reply shall be deemed as struck off. To come up for arguments on 14.12.2021 before D.B at Camp Court D.I. Khan.



(ATIQ-UR-REHMAN WAZIR)  
MEMBER (E)  
CAMP COURT, D.I KHAN



(ROZINA REHMAN)  
MEMBER (J)  
CAMP COURT, D.I KHAN

14.12.2021

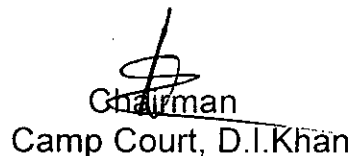
Counsel for appellant present.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Reply on behalf of respondents is still awaited. Notice be issued to the said respondents with direction to furnish the same within 10 days of the receipt of notices in office, positively. To come up for arguments on 25.01.2022 before the D.B at Camp Court, D.I.Khan.



(Rozina Rehman)  
Member (J)



Chairman  
Camp Court, D.I.Khan



the period from 01.07.2021 to 30.09.2021. The case of the appellant falls within the period of emergency. In view of Section 30 of the Khyber Pakhtunkhwa Epidemic Control and Emergency Relief Act, 2020, the limitation period provided under any law shall remain frozen. This appeal having been filed after promulgation of the said Act, is not affected by bar of limitation. Excluding the case of appellant from rigors of limitation, his appeal is fit for full hearing. Keeping the question of limitation relating to filing of instant appeal intact for determination during full hearing, this appeal, subject to all just and legal objections including objection of limitation is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, 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, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 25.10.2021 before the D.B at camp court, D.I.Khan.

Appellant Deposited  
Security & Process Fee

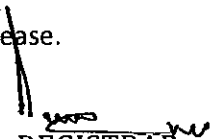
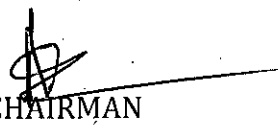
  
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 4762/2021 \_\_\_\_\_

| S.No. | Date of order proceedings    | Order or other proceedings with signature of judge   |
|-------|------------------------------|--|
| 1     | 2                            | 3  |
| 1-    | 09/04/2021                   | <p>The appeal of Syed Sajjad Ali Shah received today by post through Syed Taj Ali Shah 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;"><br/>REGISTRAR</p>  |
| 2-    | 04/06/2021<br><br>28.07.2021 | <p>This case is entrusted to S. Bench Peshawar. Notices be issued to appellant/counsel for preliminary hearing on 28/07/2021.</p> <p style="text-align: right;"><br/>CHAIRMAN</p> <p>Nemo for the appellant. This case belongs to the D.I.Khan Region and such cases were previously heard at camp court, D.I.Khan. May be notices issued to appellant/counsel have not been received by them, therefore, they are not in attendance.</p> <p>On having gone through the memorandum of appeal, in term of normal course; the appeal appears to be time barred but view of particular legal position to be discussed hereinafter, the bar of limitation for the time-being is immaterial. In wake of COVID, 19, the Government of Khyber Pakhtunkhwa for the first time declared Public Health Emergency in March, 2020 for three months which was extended from time to time for further term and presently it has been extended by the Government vide Notification No. SOG/HD/1-102/Covid-19/2020/3062, dated 30.06.2021 for</p> |

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR**

In service Appeal No. \_\_\_\_\_/2021

Syed Sajid Ali Shah  
**(Appellant)**

**VERSUS**

GOVT of KPK etc  
**(Respondents)**

**I N D E X**

| S.No. | Description of documents   | Pages      |
|-------|--|------------|
| 1.    | Memorandum of Appeal along with affidavit, with application for condonation of delay.  | 2-10       |
| 2.    | Copy of CNIC, of the appellant.  | A/11       |
| 3.    | Copy of the medical documents of the appellant.  | B<br>12-37 |
| 4.    | Copy of the removal/dismissal from service order passed by the respondent No.4 dated 29/09/2020 along with its better copy.                          | C<br>38-39 |
| 5.    | Copies of the service appeal filed by the appellant before the respondent No.3 and that of the order dated 25/02/2021 passed by the respondent No.2. | D<br>40-43 |
| 6.    | Copies of service appeal filed by the appellant before the respondent No.2 and that of the order dated 16/03/2021.                                   | E<br>44-46 |
| 7.    | Copy of postal receipts.   | 47         |
| 8.    | Vakalatnama.   | 48-49.     |

Dt: 02/04/2021

Appellant's counsel

  
**Syed Taj Ali Shah**  
AHC, D.I.Khan

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. 4762/2021

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 4826

Dated 9/4/2021

**Syed Sajid Ali Shah** son of Syed Irshad Hussain Shah  
Caste Syed r/o Ijaz Abad Muryali Tehsil & District , Tehsil  
& District Dera Ismail Khan. Ex-Constable # 1856 District  
Police D. I. Khan, 2655 Elite Force Platoon No.99.

**(Appellant)**

**VERSUS**

1. Government of KPK, through Home Secretary,  
Khyber Pakhtunkhwa Peshawar.
2. Inspector Genral of Police Khyber Pakhtunkhwa  
Peshawar.
3. Commandant Elite Force Khyber Pakhtunkhwa  
Peshawar.
4. Deputy Commandant Elite Force Khyber  
Pakhtunkhwa Peshawar.
5. Regional Police Officer/DIG, Region Dera Ismail  
Khan.
6. District Police Officer, Dera Ismail Khan.

..... **(RESPONDENTS)**

**Filed to-day**

**Registrar**

9/4/2021

**APPEAL UNDER SECTION 4 OF THE KPK SERVICES  
TRIBUNAL ACT, 1974, AGAINST THE IMPUGNED  
ORDER No. 1143 dated 16/03/2021 ISSUED BY  
RESPONDENT NO. 2, WHEREBY THE service  
appeal of the APPELLANT WAS dismissed being  
time barred WHICH IS AGAINST THE LAW AND IN  
VIOLATION OF SERVICES LAWS AND RULES AND**

**THE APPELLANT WAS CONDEMNED UNHEARD  
WITH MALAFIDES.**

**PRAYER**

On acceptance of this appeal, impugned order No. 1143 DATED 16/03/2021 issued by respondent No.2 may please be reversed and set-aside and the respondents be directed to reinstate the appellant in service with all back benefits.

**Note:** Addresses given above shall suffice the object of service. All necessary and proper parties have been arrayed in the panel of respondents.

***Respectfully Sheweth;***

1. That the petitioner is law abiding citizen of Pakistan and is enjoying well reputation in the society and is educated person having domicile of District Dera Ismail Khan.
2. That the appellant was inducted in Police Department as Constable (BPS-05) after adopting all the legal and coddle formalities on 27/07/2007. Copies of the CNIC card, service card are enclosed as **Annexure-A**
3. That the appellant served the department with great zeal and to the entire satisfaction of his superiors but suddenly, in the month of January 2020 the appellant became the patient of disease/pain "SHAITICA", due to this unfortunate disease/pain of "SHAITICA" appellant could not perform his duty. The appellant was examined and remained under treatment by the orthopaedic doctors of DHQ hospital D.I.Khan on 19/01/2020 to 06/08/2020 for several time. Later on after operation and treatment the appellant was suggested complete bed rest by the doctors. Copies of the medical documents of the appellant are enclosed as **Annexure-B.**

*Shah  
Adv  
02/04/21*

4. That the appellant inform his high-ups about the said disease and pain time and again but on 29/09/2020 the appellant was informed on his mobile phone by the concerned of the office of the Deputy Commandant Elite Force KPK Peshawar/respondent No.4 that in past an inquiry was conducted against the appellant and after the inquiry it was concluded that the appellant was removed/dismis from service by the order No.11302-9/EF dated 29/09/2020 passed by the respondent No.4 copies of the said order is enclosed as **Annexure-C.**

5. That after the dismissal/removal from service of the appellant by the impugned order of respondent No.4, the appellant filed the mercy petition/service appeal before the respondent No.3 against the order of respondent NO.4 the same was remain in progress but later on respondent No.3 dismissed the service appeal of the appellant by his order No.1688-95/EF dated 25/02/2020. Copies of the appeal and that of the order are enclosed as **Annexure-D** respectively.

6. That after the dismissal of appeal by the respondent No.3 the appellant filed a service appeal/mercy petition before the respondent No.2, the same was remain in progress but later on respondent No.2 dismissed the service appeal of the appellant by his order No.1143 dated 16/03/2021. Copies of the appeal and that of the order are enclosed as **Annexure-E** respectively.

7. That Feeling aggrieved from the removal order and impugned order No.1143 dated 16/03/2021, the appellant has left with no other remedy, but to invoked the jurisdiction of this worthy service tribunal in attending circumstances by way of filling the instant appeal on inter alia the following grounds;

### **GROUNDS**

- a. That the said impugned removal orders passed by the respondent No.2 to 4 are illegal against services Law and rules, without jurisdiction, in violation of the precedents of Honourable

apex courts of the country and is not justifiable for any reason whatsoever.

- b. That appellant was appointed on 27/07/2007 as constable and performs his duty in good manners under the directions of his high-ups. Since then, the appellant has been serving in police department and invested his full skill, energy and honesty in performance of his duties. But the act of the respondents is injustice with appellant and dismissal/removal from service is against law.
- c. That reasons mentioned in impugned removal order are baseless and removal order was issued without adopting any codal formalities and without any giving personal hearing to the appellant. Hence, the appellant was condemned unheard.
- d. That the appellant variously informed and produced his medical document with high-ups that the appellant is the patient of SHAITICA for almost one year but unfortunately the appellant personally served any show cause notice during the pendency of alleged inquiry proceeding. The act of the respondent No.2 to 4 while passing the said impugned orders is against the principles of natural justice of no one should be condemned unheard. In this regard at a number of occasions, it has been held by supreme court that if the employee was going to be treated under major punishment then the mandatory show cause notice, final show cause notice, chance of personal hearing should always be awarded to the employee by the employer, but in the present case the appellant was removed from service by violating all the canons of justice and service laws. Hence the removal orders are liable to be set-aside.
- e. That the appellant being citizen of Pakistan deserves to be dealt in accordance with law and the treatment meted out to him is in violation of Article 4 of our Constitution.
- f. That the orders dated 16/03/2021, 25/02/2021, 29/09/2020, are totally illegal and without lawful authority and the removal order of the appellant was passed on the so called inquiry conducted against the appellant regarding absence of appellant from duty is illegal, based on mala fide, hence, the impugned removal order is liable to be set aside.

*Asad*  
*Asad*  
 2/4/21

- g. That on 24/10/2020 the appellant filed a service appeal against the order dated 29/09/2020 passed by the deputy commandant elite force KPK Peshawar but unfortunately the same remain misplace due to transfer of elite force office. In this respect copy of the postal receipt shows that the appeal was filed within time, but proof of said receipt was ignored by the respondent No.4,3 & 2 and the removal order was finalized without awarding any chance of personal hearing, show cause notice and without considering the medical documents produced by the appellant during the pendency of service appeal to the respondent No. 2 to 4, no chance of personal hearing and show cause notice as given to appellant which is mandatory under the law, hence the appellant was condemned unheard.
- h. That counsel for the appellant may kindly be allowed to raise additional grounds at the time of arguments.

**It is thus most respectfully prayed that on acceptance of the instant appeal, this worthy Tribunal may graciously be pleased to set-aside impugned order No.1143 dated 16/03/2021 passed by the respondent No.2, declare such order as illegal, void and devoid of merits. Consequently, appellant may please be reinstated in service with all back benefits. This appeal may please be allowed with costs. Any other relief deemed appropriate in circumstances of the case may also be allowed in favour of appellants and against respondents with costs.**

Dated 02/04/2021

Your humble appellant

  
**Syed Sajid Ali Shah**

Through counsel

  
**Syed Taj Ali Shah**  
Advocate High Court



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR**

In service Appeal No. \_\_\_\_\_/2021

Syed Sajid Ali Shah  
**(Appellant)**

**VERSUS**

GOVT of KPK etc  
**(Respondents)**

**CERTIFICATE**

Certified that appellant have not filed an appeal regarding the subject controversy, earlier in this august Tribunal.

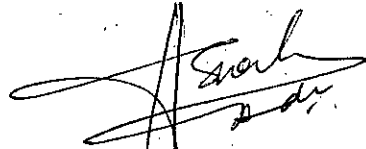
02/04/2021

  
Appellant

**NOTE**

Appeal with enclosure along-with required sets thereof are being presented in separate file covers.

02/04/2021

  
Appellant's counsel

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**PESHAWAR**

In service Appeal No. \_\_\_\_\_/2021

Syed Sajid Ali Shah  
**(Appellant)**

**VERSUS**

GOVT of KPK etc  
**(Respondents)**

**AFFIDAVIT**

I, **Syed Sajid Ali Shah** son of Syed Irshad Hussain Shah caste Syed r/o Ijaz Abad Muryali Tehsil & District Dera Ismail Khan. Ex-Constable # 1856 District Police D.I.Khan, 2655 Elite Force Platoon No.99, appellant herein, do hereby solemnly affirm on oath:-

1. That the accompanying appeal has been drafted by counsel following our instructions;
2. That all para-wise contents of the appeal are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein, based on exaggeration or distortion of facts.

02/04/2021



Deponent

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

C.M No. \_\_\_\_\_/2021

In service Appeal No. \_\_\_\_\_/2021

Syed Sajid Ali Shah  
**(Appellant)**

**VERSUS**

GOVT of KPK etc  
**(Respondents)**

**APPLICATION FOR THE CONDONATION OF DELAY**

Respectfully Sheweth:-

1. That the Service appeal of the appellant is being filed in this Honourable Tribunal and instant application may please be considered as part of main service appeal.
2. That the appellant remained the patient of "SHAITICA"/pain disease, more ever the impugned removal order is against the facts after the removal order dated 29/09/2020 passed by the respondent No.4 petitioner filed service appeal before the respondent No.3 on 24/10/2020 which was filled within time but the respondent 2 & 3 does not consider the written proof in shape of postal receipt, therefore the objection raised by the respondent No. 2 & 3 respect of limitation period is against the facts and circumstances of the case. Copy of the postal receipt is attached at page No.47 of the instant service appeal.
3. That the Honourable Tribunal has got vast and ample power to entertain this service appeal.

In view of the above it is humbly prayed that delay in filing of Service Appeal pointed out by the respondent No. 2 & 3 which is against the written proof, may kindly be condoned by delivering Judgment on merit in the large interest of justice.

\_02/04/2021

Your humble appellant

*(Signature)*  
**Syed Sajid Ali Shah**

Through counsel *(Signature)*

**AFFIDAVIT**

I, **Syed Sajid Ali Shah** son of Syed Irshad Hussain Shah Caste Syed r/o Ijaz Abad Muryali Tehsil & District, Dera Ismail Khan. Ex-Constable # 1856 District Police D. I. Khan 2655 Elite Force Platoon



No.99, the appellant, do hereby solemnly affirm on oath that all para-wise contents of the above application are true and correct to the best of my knowledge, belief and information, as communicated to me; that nothing has been deliberately concealed or kept secret from this august Tribunal.




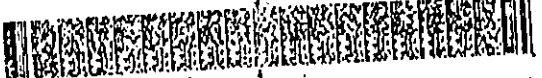
**Deponent**


"A/11"

حکومت پاکستان  
قومی شناختی کارڈ  
12101-0977601-7  
سیّد زاہر علی شاہ  
پتو: سیّد زاہر حسین شاہ  
شناختی کارڈ  
تاریخ پیدائش: 24/06/1981  
گزارش شدہ

U3T24D 12101-0977601-7  
149815111Z  
09/01/2023 09/01/2013  
تاریخ اجراء: 09/01/2013  
تاریخ منقذہ: 09/01/2023  
کشیورہ کارڈ کے برائے برائے

  
02/04/21

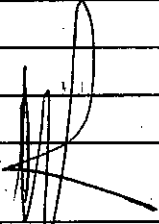
Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP

SECOND FOLLOW UP

THIRD FOLLOW UP

FOURTH FOLLOW UP

05/04/2020  


## DISCHARGE SLIP

(ORTHOPADIC DEPTT:)

DHQ Teaching Hospital (MTI) D.I.Khan

Incharge  
Professor

Dr. Muhammad Ali Shah  
MBBS, FCPS (ORTHO)

Assistant Professor  
Dr. Muhammad Shafique  
MBBS, FCPS (ORTHO)

Dr. Yousaf Gul  
MBBS, FCPS (ORTHO)

Associate Professor

Dr. Shakeel Ahmad Shah  
MBBS, FCPS (ORTHO)

Dr. Irfan Aziz Khan  
Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

Dr. Saad Akbar Shah  
MBBS, MO

Pt's Name Sajid Ali Fath/Hasb: Name Gulshad hameed

Age / Sex Male (39 years) Bed No 15

Address Basti Ejat Abad Murjal D.I.Khan

Admission no 225/72 Date of admission 19/11/2020

Date of Operation 22/11/20 Date of Discharge 24/11/2020

Diagnosis Left leg Shaitica Pain All BP-e

Operation Shaitica Pain left / hambrans

Condition Discharge

Discharge Card Made by Doctor (Name) DR Shakeel

نوٹ: آئندہ معائنہ کے لیے ریکارڈ ضرور ہمراہ لائیں۔ شکر

B/12

INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Delv

α Day hip Joint

CBC

Uric Acid

RA factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

Handwritten signature and scribbles.

TREATMENT AT HOME

(گھر میں علاج)

Rx:

Cap Gablin loomf

اردو زبان رات کو (15 دن)

Tabr Synflex 500mg

1+1 15 دن

Cap E 500 400mg

افغانی پیسٹ

SPECIAL INSTRUCTION

(ضروری ہدایات)

(1) اگر انگلیاں سوج جائیں یا نیلی پڑ جائیں تو فوراً تشریف لائیں

(2) دن بعد ہانکے کھولے

(3) دن بعد زخم پر پٹی کھولیں

Medical Officer  
DHO Teaching Hospital  
Khair

Bad test  
15 days

B/B

Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP

SECOND FOLLOW UP

THIRD FOLLOW UP

FOURTH FOLLOW UP

02/04/20  
[Signature]

## DISCHARGE SLIP

(ORTHOPADIC DEPTT:)

**DHQ Teaching Hospital (MTI) D.I.Khan**

Incharge  
Professor  
**Dr. Muhammad Ali Shah**  
MBBS, FCPS (ORTHO)

Assistant Professor  
**Dr. Muhammad Shafique**  
MBBS, FCPS (ORTHO)

**Dr. Yousaf Gul**  
MBBS, FCPS (ORTHO)

Associate Professor  
**Dr. Shakeel Ahmad Shah**  
MBBS, FCPS (ORTHO)

**Dr. Irfan Aziz Khan**  
Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

**Dr. Saad Akbar Shah**  
MBBS, MO

Pt's Name Sajjid Ali Fath/Hasb: Name Ishaq Khan

Age / Sex Male (39 years) Bed No 16

Address Basti Ahsan Nizyali D.I.Khan

Admission no 332/102 Date of admission 05/2/2020

Date of Operation 8/2/20 Date of Discharge 10/2/20

Diagnosis left leg Shaitica Aic LBP - e

Operation Shaitica Pain left/humbers

Condition Discharge

Discharge Card Made by Doctor (Name) DR Shakeel

نوٹ: آئندہ معائنہ کے لیے یہ کارڈ ضرور ہمراہ لائیں۔ شکر

8/14



INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Adl  
X Ray hip  
Joint

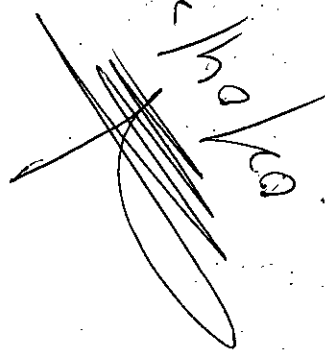
Cbc

Uric Acid

RA Factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

22/10/20  


TREATMENT AT HOME

(گھر میں علاج)

Rx:

Cap Gablin 100mg  
اروزانہ رات کو (15 دن)

Tab. Synflex 550mg  
1+1  
15 دن

Cap. Esso 400mg  
1+1  
15 دن

SPECIAL INSTRUCTION

Bad rest for  
15 days

(ضروری ہدایات)

.....(1) اگر اٹھیاں سوج جائیں یا نالی پڑ جائیں تو فوراً تشریف لائیں

.....(2) دن بعد ناکے کو لیجئے

.....(3) دن بعد نرم پڑی کو لیجئے

Medical Officer  
DHO Teaching Hospital  
22/10/20

"B/15"

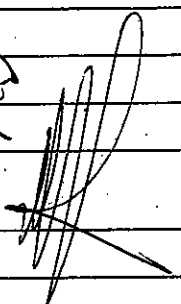
Follow UP  
(دوباره معائنہ)

FIRST FOLLOW UP

SECOND FOLLOW UP

THIRD FOLLOW UP

FOURTH FOLLOW UP

02/04/21  


## DISCHARGE SLIP

(ORTHOPADIC DEPTT:)

DHQ Teaching Hospital (MTI) D.I.Khan

Incharge  
Professor

Dr. Muhammad Ali Shah  
MBBS, FCPS (ORTHO)

Assistant Professor

Dr. Muhammad Shafique  
MBBS, FCPS (ORTHO)

Dr. Yousaf Gul  
MBBS, FCPS (ORTHO)

Associate Professor

Dr. Shakeel Ahmad Shah  
MBBS, FCPS (ORTHO)

Dr. Irfan Aziz Khan

Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

Dr. Saad Akbar Shah  
MBBS, MO

Pt's Name Sajid Ali Fath/Hasb: Name Qasid Hussain

Age / Sex male (39 years) Bed No. 11

Address Basti Ejaz Abad Mirfaj D.I. Khan

Admission no. 384/124 Date of admission 26/2/20

Date of Operation 28/2/20 Date of Discharge 30/2/20

Diagnosis left leg Shaitica All LBP e

Operation Shaitica Pain left thumbs

Condition Discharge

Discharge Card Made by Doctor (Name) DR Shakeel

نوٹ: آئندہ معائنہ کے لیے یہ کارڈ ضرور ہمراہ لائیں۔ شکر

B/16

INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Advs  
X-Ray Hip Joint  
CBC  
Uric Acid  
RA Factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

~~Handwritten signature~~

TREATMENT AT HOME

(گھر میں علاج)

Rx

Cap. Gablin 100mg  
1 روزانہ 3 (0715)  
Tab. Synflex 50mg  
0715 1+1

Cap. E 500 40mg  
ایک بار ایک بار

SPECIAL INSTRUCTION

Bad Rest for 15 days

(ضروری ہدایات)

- 1) اگر اٹھیاں سوج جائیں یا نلی چھانیں تو فوراً تشریف لائیں
- 2) دن بعد ناکے کھولے
- 3) دن بعد زخم پر پٹی کھولیں

Medical  
Hospital

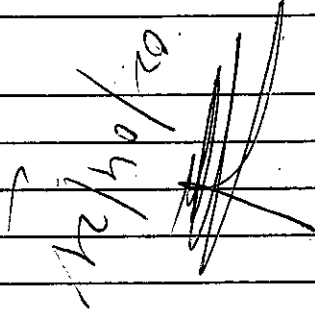
Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP

SECOND FOLLOW UP

THIRD FOLLOW UP

FOURTH FOLLOW UP

02/04/20  


## DISCHARGE SLIP

(ORTHOPADIC DEPTT:)

### DHQ Teaching Hospital (MTI) D.I.Khan

Incharge  
Professor  
Dr. Muhammad Ali Shah  
MBBS, FCPS (ORTHO)

Associate Professor  
Dr. Shakeel Ahmad Shah  
MBBS, FCPS (ORTHO)

Assistant Professor  
Dr. Muhammad Shafique  
MBBS, FCPS (ORTHO)

Dr. Irfan Aziz Khan  
Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

Dr. Yousaf Gul  
MBBS, FCPS (ORTHO)

Dr. Saad Akbar Shah  
MBBS, MO

Pt's Name Sajid Ali Fath/Hasb: Name Ghulam Hussain

Age / Sex Male (39 years) Bed No. 10

Address Basti Ejaz Abad Murfali D. U. Khan

Admission no. 520/210 Date of admission 12/3/20

Date of Operation 14/3/20 Date of Discharge 15/3/20

Diagnosis Left leg Shavica All LBP

Operation Shavica Pain left/umbones

Condition Discharge

Discharge Card Made by Doctor (Name) DR Shakeel

نوٹ! آئندہ معائنہ کے لیے یہ کارڈ ضرور ہمراہ لائیں۔ شکریہ

B/18

INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Order:

X-Ray hip Joint

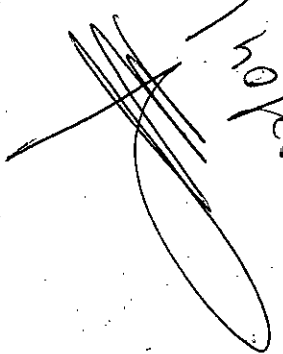
CBC

Uric Acid

RA Factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

12/10/20  


TREATMENT AT HOME

(گھر میں علاج)

Rx:

Cap. Gablin 100mg  
1 روزانہ ایک بار (15 دن)

Tab. Synflex 550mg  
1 + 1 (15 دن)

Cap. Eso 40mg  
ایک بار ایک بار

SPECIAL INSTRUCTION

(ضروری ہدایات)

Bad best for  
15 days

(1) اگر انگلیاں سوج جائیں یا نپلی پڑ جائیں تو فوراً تشریف لائیں

(2) دن بعد نکلے کو لیے

(3) دن بعد زخم پر پی کھولے

Mental Officer  
Hospital  
D. Khan

Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP

SECOND FOLLOW UP

*Handwritten signature and scribbles*

THIRD FOLLOW UP

FOURTH FOLLOW UP

**DISCHARGE SLIP**

(ORTHOPADIC DEPTT:)

**DHQ Teaching Hospital (MTI) D.I.Khan**

Incharge Professor  
**Dr. Muhammad Ali Shah**  
MBBS, FCPS (ORTHO)

Assistant Professor  
**Dr. Muhammad Shafique**  
MBBS, FCPS (ORTHO)

**Dr. Yousaf Gul**  
MBBS, FCPS (ORTHO)

Associate Professor  
**Dr. Shakeel Ahmad Shah**  
MBBS, FCPS (ORTHO)

**Dr. Irfan Aziz Khan**  
Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

**Dr. Saad Akbar Shah**  
MBBS, MO

Pt's Name Saeed Ali Fath/Hasb: Name Ghoshad Hussain

Age / Sex Male (39 year) Bed No. 09

Adress Basti Ejaz Abad Murjati D.I. Khan

Admission no. 598/270 Date of admission 26/3/2020

Date of Operation 27/3/2020 Date of Discharge 29/3/2020

Diagnosis left leg Shaitra AK LRP. e

Operation Shaitra Pain left hamstrings

Condition Discharge

Discharge Card Made by Doctor (Name) Dr. Shakeel

نوٹ: آئندہ معائنہ کے لیے ریکارڈ ضرور ہمراہ لائیں۔ شکر

*Handwritten note: B/20*

INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Adv: X-Ray hip Joint

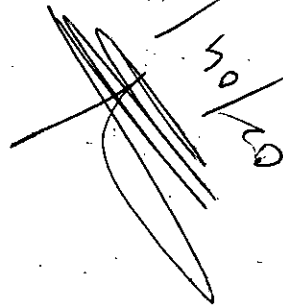
CBC

uric acid

RA factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

12/30/20  


B/21

TREATMENT AT HOME

(گھر میں علاج)

Rx:

Cap. Gablin 100mg  
اوروزان دانے کی 15 دن

Tab. Synflex 500mg

1+1 15 دن

Cap. Esson 400mg  
اور جالی سے  
SPECIAL INSTRUCTION

Bad best for  
15 days

(ضروری ہدایات)

(1) اگر انگلیاں سوج جائیں یا نینبی بڑ جائیں تو فوراً تشریف لائیں

(2) دن بعد علاج کو لیے

(3) دن بعد زخم پر پٹی کو لیے

Medical Hospital

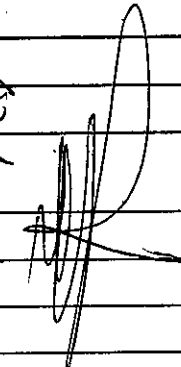
Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP

SECOND FOLLOW UP

THIRD FOLLOW UP

FOURTH FOLLOW UP

62/04/21  


## DISCHARGE SLIP

(ORTHOPADIC DEPTT:)

### DHQ Teaching Hospital (MTI) D.I.Khan

Incharge  
Professor  
Dr. Muhammad Ali Shah  
MBBS, FCPS (ORTHO)

Assistant Professor  
Dr. Muhammad Shafique  
MBBS, FCPS (ORTHO)

Dr. Yousaf Gul  
MBBS, FCPS (ORTHO)

Associate Professor  
Dr. Shakeel Ahmad Shah  
MBBS, FCPS (ORTHO)

Dr. Irfan Aziz Khan  
Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

Dr. Saad Akbar Shah  
MBBS, MO

Pt's Name Sajid Ali Fath/Hasb: Name Ishad Hussain

Age / Sex male (30 years) Bed No. 08

Address Basti Ejaz Abad Murjani D. 11462

Admission no. 612/332 Date of admission 11/4/2020

Date of Operation 13/4/2020 Date of Discharge 16/4/2020

Diagnosis left leg shaftic Alk LBP-e

Operation Shaftic Pain left / humbers

Condition Discharge

Discharge Card Made by Doctor (Name) DR Shakeel

نوٹ: آئندہ معائنہ کے لیے یہ کارڈ ضرور ہمراہ لائیں۔ شکریہ

B/22



INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Adv:

X Ray Hip Joint

CBC

uric acid

RA factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آرپیشن کے نوٹس)

12/11/20  


B/23

TREATMENT AT HOME

(گھر میں علاج)

Rx:

Cap: Gablin 100mg  
1 اور دن 3 (15 دن)

Tab: Synflex 550mg

1 + 1  
15 دن

Cap: Esson 400mg

ایک بار 15 دن

SPECIAL INSTRUCTION

(ضروری ہدایات)

(1) اگر انگلیاں سوج جائیں یا نلی بڑ جائیں تو فوراً تشریف لائیں

(2) دن بعد ٹائیک کھولے

(3) دن بعد زخم پر پی کھولنے

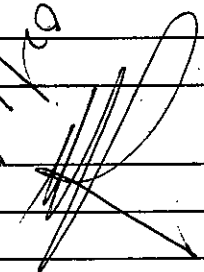
Bad  
28A  
15 days

Medical Office  
OHQ Teaching Hospital  
Islamabad

Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP \_\_\_\_\_

SECOND FOLLOW UP \_\_\_\_\_

02/11/21  


THIRD FOLLOW UP \_\_\_\_\_

FOURTH FOLLOW UP \_\_\_\_\_

**DISCHARGE SLIP**

(ORTHOPADIC DEPTT:)

**DHQ Teaching Hospital (MTI) D.I.Khan**

Incharge Professor  
**Dr. Muhammad Ali Shah**  
MBBS, FCPS (ORTHO)

Associate Professor  
**Dr. Shakeel Ahmad Shah**  
MBBS, FCPS (ORTHO)

Assistant Professor  
**Dr. Muhammad Shafique**  
MBBS, FCPS (ORTHO)

**Dr. Irfan Aziz Khan**  
Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

**Dr. Yousaf Gul**  
MBBS, FCPS (ORTHO)

**Dr. Saad Akbar Shah**  
MBBS, MO

Pt's Name Sajjid Ali Fath/Hasb: Name Ghoshal Hussain

Age / Sex Male (34 years) Bed No 14

Address Basti Ejaz Abad Murjuli D.I. Khan

Admission no 702132 Date of admission 27/4/2020

Date of Operation 29/4/20 Date of Discharge 30/4/2020

Diagnosis Left leg Shanka pain ALCLRA-C

Operation Shanka pain left / Inwards

Condition Discharge \_\_\_\_\_

Discharge Card Made by Doctor (Name) DR Shakeel

نوٹ: آئندہ معائنہ کے لیے ریکارڈ ضرور مہراؤ لائیں۔ شکر

B/24

INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Adv

X-Ray Hip Joint

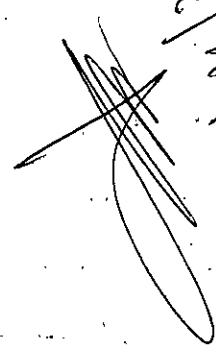
CBC

uric Acid

RA factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

17/10/20  


TREATMENT AT HOME

(گھر میں علاج)

Rx:

Cap. Gablin 100mg  
1 روزانہ رات کو (15 دن)

Tab: Syn flex 550mg  
1+1  
15 دن

Cap: E 400  
550mg  
رات کو

SPECIAL INSTRUCTION

(ضروری ہدایات)

Bad test for  
15 d of

Medical Officer  
Hospital

- (1) اگر انکلیاں سوج جائیں یا تپلی پڑ جائیں تو فوراً تشریف لائیں
- (2) دن بعد ٹیکے کھولے
- (3) دن بعد زخم پر پٹی کھولیں

B/25

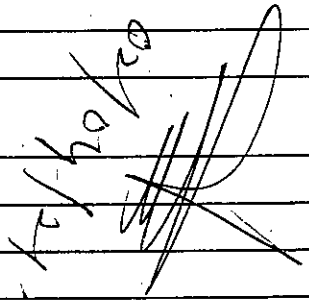
Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP \_\_\_\_\_

SECOND FOLLOW UP \_\_\_\_\_

THIRD FOLLOW UP \_\_\_\_\_

FOURTH FOLLOW UP \_\_\_\_\_

02/04/20  


## DISCHARGE SLIP

(ORTHOPADIC DEPTT:)

**DHQ Teaching Hospital (MTI) D.I.Khan**

Incharge  
Professor

**Dr. Muhammad Ali Shah**  
MBBS, FCPS (ORTHO)

Assistant Professor  
**Dr. Muhammad Shafique**  
MBBS, FCPS (ORTHO)

**Dr. Yousaf Gul**  
MBBS, FCPS (ORTHO)

Associate Professor

**Dr. Shakeel Ahmad Shah**  
MBBS, FCPS (ORTHO)

**Dr. Irfan Aziz Khan**  
Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

**Dr. Saad Akbar Shah**  
MBBS, MO

Pt's Name Sajid Ali Fath/Hasb: Name Ikhsad Hussain

Age / Sex Male (34 years) Bed No 13

Address Basti Ejaaz Abad Murayali D.I.Khan

Admission no 812420 Date of admission 13/5/2020

Date of Operation 15/5/2020 Date of Discharge 17/5/2020

Diagnosis Left leg Shaitica Pain Ac LBP-e

Operation Shaitica pain left hamboes

Condition Discharge \_\_\_\_\_

Discharge Card Made by Doctor (Name) DR Shakeel

نوٹ: آئندہ معائنہ کے لیے یہ کارڈ ضرور منجرا ہلا کریں۔ شکر

B  
26

INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Adm.  
X-Ray hip Joint


CR  
uric Acid

RA factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

12/27  
B

12/27/20  


TREATMENT AT HOME

(گھر میں علاج)

Rx  
Cap. Gablin 100mg  
1 روزانہ رات کی (15 دن)

Tab. Synflex 550mg  
1 + 1  
15 دن

Cap. Essonorm  
1 + 1  
15 دن

SPECIAL INSTRUCTION

(ضروری ہدایات)

Bad  
rest for  
15 days

Medical Officer  
Teaching Hospital  
Man

(1) اگر اٹھیاں سوج جائیں یا نیلی پڑ جائیں تو فوراً تشریف لائیں

(2) دن بعد ٹائٹ کھولیں

(3) دن بعد ڈرگم پڑھنی کھولیں

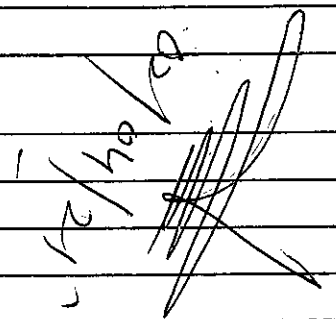
Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP

SECOND FOLLOW UP

THIRD FOLLOW UP

FOURTH FOLLOW UP

29/04/21  


## DISCHARGE SLIP

(ORTHOPADIC DEPTT:)

### DHQ Teaching Hospital (MTI) D.I.Khan

Incharge  
Professor  
Dr. Muhammad Ali Shah  
MBBS, FCPS (ORTHO)

Assistant Professor  
Dr. Muhammad Shafique  
MBBS, FCPS (ORTHO)

Dr. Yousaf Gul  
MBBS, FCPS (ORTHO)

Associate Professor  
Dr. Shakeel Ahmad Shah  
MBBS, FCPS (ORTHO)

Dr. Irfan Aziz Khan  
Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

Dr. Saad Akbar Shah  
MBBS, MO

Pt's Name Sajid Ali Fath/Hasb: Name Yashad hussain

Age / Sex Male (32 years) Bed No 12

Address Bast Ejar Abad marguli D.I.Khan

Admission no 924/510 Date of admission 29/5/2020

Date of Operation 1/6/2020 Date of Discharge 3/6/2020

Diagnosis Left leg Shatica A/L CBD-e

Operation Shatica pain left humbers

Condition Discharge

Discharge Card Made by Doctor (Name) DR Shakeel

نوٹ: آئندہ معائنہ کے لیے یہ کارڈ ضرور لے کر آنا۔

B/28

INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Adv's

X. Day hip Joint

CBC

uric acid

RA factors

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

12/04/20  
~~12/04/20~~

TREATMENT AT HOME

(گھر میں علاج)

Rxn

Cap: Gablin 100mg

1 روزانہ رات کو 19 > 20

Tab: Syn flex 550mg

1 + 1 15 > 20

Cap: Esso 400mg

1 + 1

SPECIAL INSTRUCTION

(ضروری ہدایات)

(1) اگر انگلیاں سوج جائیں یا نعلی پڑ جائیں تو فوراً تشریف لائیں

(2) دن بعد ٹائیکس کھولیں

(3) دن بعد ڈرگم پری کھولیں

15 days

Teaching Hospital

Q. Khan

Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP \_\_\_\_\_

SECOND FOLLOW UP \_\_\_\_\_

THIRD FOLLOW UP \_\_\_\_\_

FOURTH FOLLOW UP \_\_\_\_\_

## DISCHARGE SLIP

(ORTHOPADIC DEPTT:)

**DHQ Teaching Hospital (MTI) D.I.Khan**

Incharge  
Professor

Dr. Muhammad Ali Shah  
MBBS, FCPS (ORTHO)

Assistant Professor

Dr. Muhammad Shafique  
MBBS, FCPS (ORTHO)

Dr. Yousaf Gul  
MBBS, FCPS (ORTHO)

Associate Professor

Dr. Shakeel Ahmad Shah  
MBBS, FCPS (ORTHO)

Dr. Irfan Aziz Khan

Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

Dr. Saad Akbar Shah  
MBBS, MO

Pt's Name Sejjid Ali Fath/Hasb: Name Jashad Hussain

Age / Sex Male (89 year) Bed No 12

Address Basti Ejaz Abad Murjani D-1. Khan

Admission no 1012/624 Date of admission 14/6/2020

Date of Operation 16/6/2020 Date of Discharge 18/6/2020

Diagnosis Left leg Shatica All LBP - e.

Operation Shatica Pain left hamboen.

Condition Discharge \_\_\_\_\_

Discharge Card Made by Doctor (Name) Dr. Shakeel

نوٹ: آئندہ معائنہ کے لیے یہ کارڈ ضرور ہمراہ لائیں۔ شکرہ

B/30



INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Adw:

X Ray hip Joint

CBC

Uric Acid

RA factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

~~Handwritten signature and date: 20/10/20~~

B/31

TREATMENT AT HOME

(گھر میں علاج)

Rx:

Cap: Gablin 100mg  
اردکانہ رات کو (15 دن)

Tab: Synflex 550mg  
1 + 1  
15 دن

Cap: Esso 400mg  
ایڈ خالی پیٹ

SPECIAL INSTRUCTION

Bad rest for 15 days

(ضروری ہدایات)

- (1) اگر انگلیاں سوج جائیں یا نلی پر جائیں تو فوراً تشریف لائیں
- (2) دن بعد ٹائٹ کھولیں
- (3) دن بعد رزم پرچی کھولیں

Handwritten text: Hospital, Khat

Follow UP  
(دو بارہ معائنہ)

FIRST FOLLOW UP \_\_\_\_\_

SECOND FOLLOW UP \_\_\_\_\_

THIRD FOLLOW UP \_\_\_\_\_

FOURTH FOLLOW UP \_\_\_\_\_

## DISCHARGE SLIP

(ORTHOPADIC DEPTT:)

**DHQ Teaching Hospital (MTI) D.I.Khan**

Incharge  
Professor

Dr. Muhammad Ali Shah  
MBBS, FCPS (ORTHO)

Assistant Professor

Dr. Muhammad Shafique  
MBBS, FCPS (ORTHO)

Dr. Yousaf Gul  
MBBS, FCPS (ORTHO)

Associate Professor

Dr. Shakeel Ahmad Shah  
MBBS, FCPS (ORTHO)

Dr. Irfan Aziz Khan

Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

Dr. Saad Akbar Shah  
MBBS, MO

Pt's Name Sajid Ali Fath/Hasb: Name Irshad hussain

Age / Sex male (39 years) Bed No 07

Address Basti Ejaz Abad murjati D.I.Khan

Admission no 613/78 Date of admission 30/6/2020

Date of Operation 2/7/2020 Date of Discharge 4/7/2020

Diagnosis Left leg Shaitica All LRP. e

Operation Shaitica Pain left humbress

Condition Discharge \_\_\_\_\_

Discharge Card Made by Doctor (Name) DR Shakeel

نوٹ: آئندہ معائنہ کے لیے یہ کارڈ ضرور لے کر آئیں۔ شکرہ

B/32

INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Adv

X Ray hip Joint

CBC

Uric Acid

RA factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

~~Handwritten signature~~  
12/10/20

TREATMENT AT HOME

(گھر میں علاج)

Lx.

Cap Gablin 100mg  
1 روزانہ رات کی (15 دن)

Tab: Syn-flex 550mg

14/15 دن

Cap ESO 40mg  
گلابی پٹ

SPECIAL INSTRUCTION

(ضروری ہدایات)

- ..... (1) اگر انگلیاں سوج جائیں یا نلی بڑ جائیں تو فوراً تشریف لائیں
- ..... (2) دن بعد نکلے کھولے
- ..... (3) دن بعد رقم پڑی کھولے

Handwritten signature  
15/10/20

B/33

Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP

SECOND FOLLOW UP

THIRD FOLLOW UP

FOURTH FOLLOW UP

02/04/21

## DISCHARGE SLIP

(ORTHOPADIC DEPTT:)

DHQ Teaching Hospital (MTI) D.I.Khan

Incharge  
Professor

Dr. Muhammad Ali Shah  
MBBS, FCPS (ORTHO)

Associate Professor

Dr. Shakeel Ahmad Shah  
MBBS, FCPS (ORTHO)

Assistant Professor

Dr. Muhammad Shafique  
MBBS, FCPS (ORTHO)

Dr. Irfan Aziz Khan

Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

Dr. Yousaf Gul  
MBBS, FCPS (ORTHO)

Dr. Saad Akbar Shah  
MBBS, MO

Pt's Name Sajid Ali Fath/Hasb: Name Ishaad Hussain

Age / Sex Male (39 year) Bed No 05

Address Bachi Ejaz Abad Murjuli D.I. Khan

Admission no 046/42 Date of admission 17/7/2020

Date of Operation 20/7/20 Date of Discharge 23/7/2020

Diagnosis Left leg Shatica AK LBP - P

Operation Static Pain left leg/Humbress

Condition Discharge

Discharge Card Made by Doctor (Name) DR Shakeel

B/34

نوٹ: آئندہ معائنہ کے لیے ریکارڈ ضرور ہمراہ لائیں۔ شکر

INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Adv  
X Ray hip joint

CBC

uric acid

RA factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

B/M

12/11/21  
CA

TREATMENT AT HOME

(گھر میں علاج)

Rx:  
Cap Gablin 100mg  
اروزانہ دانت کو (15 دن)

Tab. Synflex 550mg

1+1  
15 دن

Cap. Esso 100mg  
گالی پیٹ

SPECIAL INSTRUCTION

Bad test for  
15 days

(ضروری ہدایات)

- (1) اگر انگلیاں سوج جائیں یا نیلی پوجائیں تو فوراً تشریف لائیں
- (2) دن بعد ٹیکے کو لیں
- (3) دن بعد گرم پو پی کو لیں

Medical Officer  
TMC Teaching Hospital  
Khan

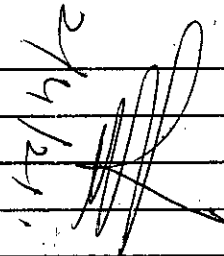
Follow UP  
(دوبارہ معائنہ)

FIRST FOLLOW UP \_\_\_\_\_

SECOND FOLLOW UP \_\_\_\_\_

THIRD FOLLOW UP \_\_\_\_\_

FOURTH FOLLOW UP \_\_\_\_\_

2/11/20  


# DISCHARGE SLIP

(ORTHOPADIC DEPTT:)



## DHQ Teaching Hospital (MTI) D.I.Khan

Incharge  
Professor  
Dr. Muhammad Ali Shah  
MBBS, FCPS (ORTHO)

Associate Professor  
Dr. Shakeel Ahmad Shah  
MBBS, FCPS (ORTHO)

Assistant Professor  
Dr. Muhammad Shafique  
MBBS, FCPS (ORTHO)

Dr. Irfan Aziz Khan  
Senior Registrar  
MBBS, M.S (Ortho)  
District Specialist

Dr. Yousaf Gul  
MBBS, FCPS (ORTHO)

Dr. Saad Akbar Shah  
MBBS, MO

B  
36

Pt's Name Sajid Ali Fath/Hasb: Name Ishaad Hussain

Age / Sex male (39 years) Bed No 06

Address Basti Ejar Abad Murjani D. I. Khan

Admission no 71049 Date of admission 02/18/2020

Date of Operation 4/18/2020 Date of Discharge 6/18/2020

Diagnosis Left leg Shatica AK LRP. e

Operation Shatica Pain left/humbers

Condition Discharge \_\_\_\_\_

Discharge Card Made by Doctor (Name) DR Shakeel

نوٹ: آئندہ معائنہ کے لیے کارڈ ضرور ہمراہ لائیں۔ شکرہ

INVESTIGATION / TREATMENT IN HOSPITAL

(ہسپتال میں ٹیسٹ اور علاج)

Acid

X Ray hip

Joint

CBC

urine

RA

Acid

factor

INVESTIGATION / TREATMENT IN HOSPITAL

(آپریشن کے نوٹس)

13/30  
B/30

TREATMENT AT HOME

(گھر پر علاج)

Rx

Cap Gublin 100mg

اوروڈا رابٹو (0.15)

Tab Syntex 550mg

1+ 15 دن

Cap 550 100mg

افانی بسٹ

SPECIAL INSTRUCTION

Bad rest  
18 days

(مضوری ہدایات)

(1) اگر انگلیاں سوج جائیں یا نعلی پڑ جائیں تو فوراً تشریح کریں۔

(2) دن بعد ٹیکے کو لیے

(3) دن بعد گرم پٹی کو لیجئے

Med. Officer  
Hospital  
DHO Tanchang  
Khan

12/11  
2/1/21

7

"C/39"

**Better Copy of the order No.11302-9/EF dated**  
**29/09/2020**

This order will dispose of departmental proceeding against constable Sajid Ali No.2655 of District Police D.I.Khan now on depotation in Elite force Khyber Pakhtunkhwa.

As per application of incharge platoon No. 99, he remained absent from Police line D.I.Khan without any leave or prior permission w.e.f 19/01/2020 to 21/07/2020, and 21/07/2020 to till date. In this regard charge sheet along with summary of allegations were issued to him by this office vide No 4218-23/EF dated 16/03/2020, and Mr Yousaf Khan DSP Elite Force D.I.K was appointed as inquiry officer but he failed to appear before the IO. The inquiry officer recommended him for suitable punishment. Similarly final show cause notice was issued to him by this office vide No.8921/EF dated 26/06/2020 which was delivered to him through reader DSP elite force D.i.Khan and received by himself on 08/07/2020. But he failed to reply to ensure his appearance, a notice was issued to him in daily newspaper Mashriq dated 15/08/2020 and was declared to join the inquiry after the publication of notice but he neither join the inquiry proceeding conducted against him nor appeared for duty. It seems that he has no interest in his current job.

Therefore, I, Zaib ullah khan, deputy commandant elite force Khyber Pakhtunkhwa Peshawar as competent authority, keeping in view the above facts, circumstances and recommendations of the inquiry officer impose major penalty of dismissal from service upon the defaulter official from the date of absence i.e dated 21/07/2020.

However period he remained absent i.e 184 days from duty is treated as leave without pay.

**Order Announced**

184

02/11/21



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

D/40

سروس اپیل اور خواست رقم

SERVICE APPEAL / MERCY PETITION

بابت بحالی ملازمت بعہدہ کانسٹیبل

بخدمت جناب عزت مآب

جناب کمانڈنٹ صاحب ایلیٹ فورس، خیبر پختونخواہ، پشاور

بحوالہ حکم نمبر 9/EF-11302 مورخہ 29-09-2020

مجاہد جناب ڈپٹی کمانڈنٹ ایلیٹ، خیبر پختونخواہ پشاور

اپیل کنندہ

سید ساجد علی شاہ ولد سید ارشاد حسین شاہ قوم سید سکناہ اعجاز آباد مرید آباد سندھ و تھانہ چھاؤنی

تحصیل و ضلع ڈیرہ اسماعیل خان، خیبر پختونخواہ

سابقہ کانسٹیبل نمبر 1856 ڈسٹرکٹ پولیس ڈیرہ اسماعیل خان

2655 ایلیٹ فورس پلاٹون نمبر 99

CNIC #: 12101-0977601-7

Cell: 0342-579-1314

مورخہ 31-12-2020

02/4/21

مسلم

جناب عالی! 21/4

☆ معروض ہوں کہ سائل مورخہ 27-07-2007 کو محکمہ پولیس میں بطور کانسٹیبل بھرتی ہو کر بنیادی ریکروٹ کورس بلوچ رجمنٹ سنٹرایبٹ آباد سے امتیازی نمبرات سے پاس کرنے کے بعد حسب الحکم افسران بالا اپنے فرائض منصبی متعدد Places of Posting پر احسن طریقے سے سرانجام دیتا رہا ہوں۔

☆ سائل نے آج تک اپنے کسی بھی طرز عمل (Behave) سے اپنے Seniors، Colleagues یا عوام الناس کو کبھی کسی شکایت کا موقع نہیں دیا ہے۔ جو کہ میرے سروس ریکارڈ سے بخوبی عیاں ہے۔

عالی جاہ!

☆ گزارش بحضور انور یہ ہے کہ مجھے ایک ہم چوتھم کی انکوائری کے ذریعے اپنی ملازمت، محکمہ پولیس میں سے بعہدہ کانسٹیبل برطرف کر دیا گیا ہے اور وجہ برطرفی عرصہ غیر حاضری بیان کر کے، متذکرہ ایام میں میری عدم دستیابی پر کسی بھی وضاحت کو خاطر میں لائے بغیر اور لگائے گئے الزامات کی بابت مجھ سے کسی قسم کی وضاحت لیے بغیر میرے جملہ حقوق سروس، بال بچوں کے حقوق اور اہل خانہ کے حقوق کو یکسر نظر انداز کرتے ہوئے برطرف کر دیا گیا ہے۔ جو کہ ہر لحاظ سے Socially، Morally نظر ثانی کا متقاضی ہے۔

جناب عالی!

☆ میں گھر خود کا واحد کفیل ہوں۔ میں نے اپنی بیماری جس کی ڈاکو میٹری Evidence ہمراہ لف قابل ملاحظہ ہے کی اطلاع یابی کے لیے متعدد بار اپنی کنٹرول اتھارٹی کے نوٹس میں لانے کی سعی کی لیکن کسی طرح سے بھی اسے خاطر میں نہ لایا گیا اور میرے خلاف Ex-Party پروسیڈنگ کارروائی کرتے ہوئے جملہ انکوائری پراسس میں نہ تو کسی موڑ پر بھی حقیقت کو اجاگر کیا گیا۔۔۔۔۔؟؟ بلکہ Finding رپورٹ بھی مرتب کرتے وقت میرے خلاف جملہ واقعات کو ”تروڑ مروڑ“ کر پیش کیا گیا۔ اس معاملے میں از خود صرف مجھے ٹارگٹ کرنا نہ صرف میرے ساتھ زیادتی ہے بلکہ ماورائے قانون بھی ہے۔ جس پر رحم فرمایا جانا قرین انصاف ہوگا۔

☆ عالی جاہ! میرے خلاف قبل ازیں ایسی کوئی بھی شکایت بر ریکارڈ نہیں ہے۔ لیکن از خود انکوائری آفیسر (EO) صاحب کی ذاتی مخاصمت کی بنا پر میرے خلاف کی جانے والی جملہ یکطرفہ کارروائی پر مجھے قصور وار ٹھہرانا نہ صرف ماورائے قانون ہے بلکہ ہر لحاظ سے نظر ثانی کا متقاضی بھی ہے۔

☆ عالی جاہ! ان حالات میں مجھے ملازمت سے برطرف کر دینا نہ صرف میرے بنیادی انسانی حقوق، بال بچوں کے حقوق، میری سروس کے حقوق بلکہ Natrual Justice کے بھی خلاف ہے۔

21/4/21

☆ عالی جاہ! میں نے اپنی جملہ پولیس سروس نہایت جانفشانی اور دل جمعی کے ساتھ انجام دی ہے۔ جو اندریں  
 D/42 سلسلہ متعدد بار مجھے افسران بالا کی طرف سے نقد انعام اور اعزازی اسناد سے بھی نوازا جاتا رہا ہے۔

عالی جاہ! اس جملہ معاملے میں میرے ساتھ بہت زیادتی ہوئی ہے۔ میں ایلٹ کورس Basic-5،  
 جلوزنی کیمپ نوشہرہ سے Highly Qualified کمانڈ کورس پاس ہوں اور میں نے اپنی جملہ پولیس خدمات  
 اعلیٰ ترین پولیس افسران کے ساتھ انتہائی پیشہ وارانہ طریقے اور دلیری کے ساتھ سرانجام دی ہیں۔ جس کی کسی بھی  
 source سے تصدیق کی جاسکتی ہے۔

میں ایک کارکن پولیس افسر ہوں اور میری جملہ پولیس سروس ہمیشہ ہی ایک اچھی پولیس کاری سے عبارت  
 رہی ہے۔ متذکرہ عرصہ عدم حاضری ڈیوٹی محض شدید بیماری لاحق ہو جانے کے باعث آڑے آئی۔  
 جس میں میری کسی قسم کی Dis-Honesty شامل نہ ہے۔

**اذا**

میری عاجزانہ استدعا ہے کہ مجھے طلب فرما کر تفصیلاً میری معروضات سنی جائیں اور میرے محکمانہ حقوق،  
 اہل خانہ کے حقوق اور بالخصوص۔۔۔ بالخصوص۔۔۔ بالخصوص میرے بنیادی انسانی حقوق کا خیال رکھا جا کر  
 میرے ساتھ انصاف اور رحم کا معاملہ فرماتے ہوئے اصل حقائق کو مد نظر رکھتے ہوئے اور میری 13/14 سالہ  
 کولیفائیڈ سروس کو ملحوظ خاطر رکھ کر مجھے اپنے سابقہ عہدہ کانسٹیبل پر معہ جملہ مراعات بحال فرمانے کے احکامات  
 صادر فرمائیں۔

تازیت جناب کا مشکور و ممنون رہوں گا۔

مورخہ۔ 31-12-2020

**ارض**

*(Handwritten Signature)*

سید ساجد علی شاہ ولد سید ارشاد حسین شاہ قوم سید سکند اعجاز آباد مریالی حدود تھانہ چھاؤنی  
 تحصیل و ضلع ڈیرہ اسماعیل خان، خیبر پختونخواہ

سابقہ کانسٹیبل نمبر 1856 ڈسٹرکٹ پولیس ڈیرہ اسماعیل خان

2655 ایلٹ فورس پلاٹون نمبر 99

CNIC #: 12101-0977601-7

Cell: 0342-579-1314

Attested

*(Handwritten Signature)*  
 02/04/21

نوٹ:

جملہ ضروری کاغذات ہمراہ لف قابل ملاحظہ ہیں



Office of the Deputy Commandant  
Elite Force Khyber Pakhtunkhwa Peshawar



Dated 25/02/2021

D/43

No. /EF

ORDER

This is departmental appeal submitted by EX-Constable Sajid Ali No.2655 of this Establishment against his punishment of dismissal from service passed by Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar vide No.11302-09/EF, dated 29.09.2020, which was perused by the Competent Authority and filed his appeal being time barred by 02 months and 07 days.

-Sd-

(HAMAYUN BASHIR TARAR) PSP  
Commandant,  
Elite Force Khyber Pakhtunkhwa Peshawar

No. 1688-95/EF.

Copy of above is forwarded:-

1. Superintendent of Police, HQrs: Elite Force, Peshawar.
2. Deputy Superintendent of Police, HQrs: Elite Force, Peshawar.
3. Accountant/RI, Elite Force, Khyber Pakhtunkhwa, Peshawar.
4. OASI /SRC/FMC, Elite Force, Khyber Pakhtunkhwa, Peshawar.
5. EX/FC Sajid No.2655, cell No.03425791314.

(ZAIBULLAH KHAN) P.S.P.  
Deputy Commandant  
Elite Force Khyber Pakhtunkhwa Peshawar.

Attested

02/04/21

E/44

سروس اپیل اورخواست رحم

**SERVICE APPEAL / MERCY PETITION**

بابت بحالی ملازمت بعدہ کا نشیبل

بخدمت ایپلینٹ بورڈ، CPO پشاور

زیر تحت جناب PPO خیبر پختونخواہ

بحوالہ حکم نمبر 1688-95/EF مورخہ 25/02/2021

مجاریہ دفتر جناب کمانڈنٹ ایلیٹ فورس، خیبر پختونخواہ، پشاور

اپیل کنندہ

سید ساجد علی شاہ ولد سید ارشاد حسین شاہ قوم سید سکنہ اعجاز آباد مریالی حدود تھانہ چھاؤنی

تحصیل و ضلع ڈیرہ اسماعیل خان، خیبر پختونخواہ

سابقہ کا نشیبل نمبر 1856 ڈسٹرکٹ پولیس آفیسر ڈیرہ اسماعیل خان

2655 ایلیٹ فورس پلاٹون نمبر 99

CNIC # 12101-0977601-7

Cell: 0342-5791314

مورخہ 28-02-2021

Attested



02/4/21

E/45

جناب عالی!

مشمولہ سابقہ سروس اپیل اور درخواست رحم متذکرہ جناب کمانڈنٹ صاحب ایلیٹ فورس خیبر پختونخواہ معروض ہوں کہ! میری جملہ وضاحت و گزارشات لف قابل ملاحظہ ہیں جو کہ میری جائز بیماری کو بالائے طاق رکھتے ہوئے مجھے غیر حاضر کیا جا کر ملازمت پولیس سے برطرف کر دیا گیا اور ایسا کرتے وقت میرے کسی قسم کے حقوق کو مد نظر نہ رکھا گیا۔

جناب عالی!

میری سروس اپیل پر جناب کمانڈنٹ صاحب نے ذیل احکامات صادر فرمائے

**ORDER**

This is department appeal submitted by EX-Constable Sajid Ali No.2655 of this Establishment against his punishment of dismissal from service passed by Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar vide No.11302-09/EF, dated 29-09-2020, which was perused by the Competent Authority and filed his appeal being time barred by 02 months and 07 days.

-Sd-

Commandant Elite Force  
Khyber Pakhtunkhwa Peshawar.

جناب عالی!

لہذا استدعا ہے کہ میرے ساتھ انصاف اور رحم کا معاملہ فرماتے ہوئے مجھے طلب فرما کر تھیلا میری معروضات سنی جائیں اور میرے جملہ حقوق کو مد نظر رکھتے ہوئے مجھے تاریخ برطرفی سے معہ جملہ مراعات ملازمت پر بحال فرمانے کے احکامات صادر فرمائیں

تازیت جناب کا مشکور رہوں گا!

سید ساجد علی شاہ ولد سید ارشاد حسین شاہ قوم سید سکند اعجاز آباد مریالی حدود تھانہ چھاؤنی

تحصیل و ضلع ڈیرہ اسماعیل خان، خیبر پختونخواہ

سابقہ کانسٹیبل نمبر 1856 ڈسٹرکٹ پولیس آفسر ڈیرہ اسماعیل خان

2655 ایلیٹ فورس پلاٹون نمبر 99

CNIC # 12101-0977601-7 / Cell: 0342-5791314

مورخہ 28-02-2021



Attested



21/4/21

نوٹ: جملہ ضروری کاغذات ہمراہ لف قابل ملاحظہ ہیں



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

No. S/ 143 /21, dated Peshawar the 16/03/2021.

"E/46"  
//

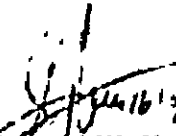
To The Commandant,  
Elite Force,  
Khyber Pakhtunkhwa, Peshawar

Subject REVISION PETITION.

Memo:


The Competent Authority has examined and filed the revision petition submitted by Ex-FC Sajid Khan No. 2655 of Elite Force against the punishment of dismissal from service awarded by Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar vide order Pndst. No. 11502-09/EF, dated 29.09.2020, being time barred.

The applicant may please be informed accordingly


  
(SYED ANIS-UL-HASSAN)  
Registrar,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

0A87  
15  
17/3

15/3

Attested:  
  
2/4/21

1557  
17 3 21

OASI BRANCH  
OASL \_\_\_\_\_  
Co \_\_\_\_\_  
Clerk \_\_\_\_\_  
Clerk \_\_\_\_\_  
Long Rec \_\_\_\_\_  
Parwana 

47

**No. 952** **RGL12683546**

For Insurance notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered addressed to \_\_\_\_\_ Date-Stamp \_\_\_\_\_

Initials of Receiving Officer \_\_\_\_\_

Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_

Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ Weight (in words) \_\_\_\_\_ Grams \_\_\_\_\_

Name and address of sender \_\_\_\_\_

26/12

**No. 272** **RGL52023650**

For Insurance notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered addressed to \_\_\_\_\_ Date-Stamp \_\_\_\_\_

Initials of Receiving Officer \_\_\_\_\_

Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_

Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ Weight (in words) \_\_\_\_\_ Kilo \_\_\_\_\_ Grams \_\_\_\_\_

Name and address of sender \_\_\_\_\_

26/12



SYED TAJ ALI SHAH

Advocate  
bc-09-0952  
Date of issue: September 2018  
Valid upto: September 2021

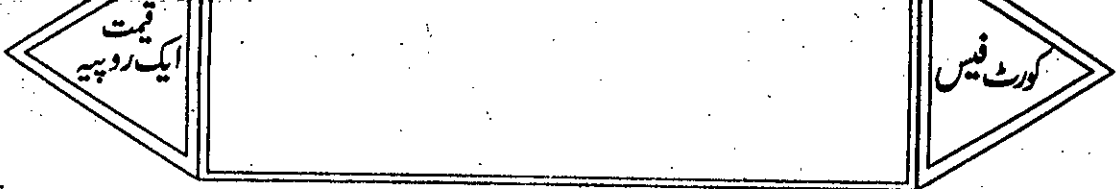


ADVOCATE HIGH COURT

وکالت نامہ

48

Secretary  
KP Bar Council



In the Court of Service Tribunal KP Peshawar/Tarnan Court D.I. Khan  
بعدالت جناب

Petitioner/Appellant مخائب

Syed Sajid Ali Shah نام Govt: of KP

دعویٰ یا جرم

Service Appeal

تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام D.I. Khan کیلئے  
Suo Taj Ali Shah Advocate High Court

کو حسب ذیل شرائط وکیل مقرر کیا ہے، کہ میں ہر پیشی پر خود بذریعہ اختیار خاص رو برو عدالت حاضر ہونا ہوں گا۔ اور ہر وقت پارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر مظہر حاضر نہ ہوا۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام پشہری کے علاوہ کسی جگہ یا پشہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پشہری کے علاوہ کسی جگہ یا پشہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر پشہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پشہری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا نفاذ واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخل صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ، یا جواب دعویٰ یا درخواست اجراء کے ذمہ و نظر ثانی اپیل و ہرجم درخواست پر دخل و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ذمہ داری کے ادا کرنے اور ہرجم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہرجم کے بیان دینے اور اس پر ثانی یا راضی نامہ و فیصلہ بر حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ پیر دن از پشہری صدر پیروی مقدمہ مذکورہ نظر ثانی و اپیل و ہرجم نامہ و درآمد کی مقدمہ یا منسوخی ذمہ داری یا درخواست حکم اجتنابی یا قرقی یا گرفتاری قبل از فیصلہ اجراء کے ذمہ داری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ ضمانت پیروی کا اختیار ہوگا اور تمام ساختہ پر داخل صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا گرفتاری یا دیگر معاملہ مقدمہ مذکورہ کی دوسرے وکیل یا پشہری کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی حکم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے۔ تاکہ سند رہے مورخہ 2 April 2018

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Accepted  
Signature  
02/4/21  
03461991567

العبد العبد العبد  
Syed Sajid Ali Shah s/o Syed Irfad Hussain Shaikh  
caste Syed s/o Ejaz Abad Murayali  
D. I. Khan  
CNIC# 12101-0977601-7



ARIF ALI

Advocate

bc-17-7335

Date of issue: June 2020

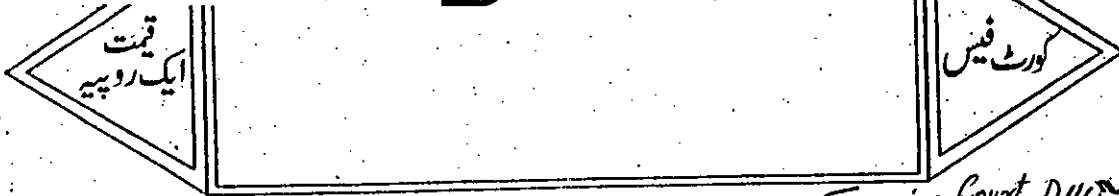
Valid upto: June 2023



Secretary  
KP Bar Council

وکالت

49



In the Court of Service Tribunal KP Peshawar / Touring Court Dera  
بعدالت جناب

Petitioner / Appellant مناجب

Syed Sajid Hussain Shah نام Govt: 57 KP

دعوی یا جرم

Service Appeal تفصیل دعوی یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا بعنوان میں اپنی طرف واسطے بیرونی وجود بدنی برائے پیشی یا تصفیہ مقدمہ بمقام D-10 Khan کیلئے

Arif Ali Baloch Advocate High Court

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشی پر خود بذریعہ مختیار خاص دور اعدالت حاضر ہونا رواں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر منظر حاضر نہ ہوا۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا چھپے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا چھپے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر مقام بکھری کے علاوہ اور جگہ سمیت ہونے یا بروز تعطیل یا بکھری کے اوقات کے آگے بچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا ضمانت واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف منسلک کردہ ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ، یا جواب دعویٰ یا درخواست اجراء نے ڈگری و نظر ثانی اپیل گرانی و ہرجم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی قسم یا ڈگری کرانے اور ہرجم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہرجم کے بیان دینے اور اس پر غامشی یا راضی نامہ و فیصلہ بر حلف کرنے، و اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از بکھری صدر بیروی مقدمہ مذکورہ نظر ثانی و اپیل و گرانی و برادری مقدمہ یا مسنون ڈگری کی طرف یا درخواست حکم انتہائی یا قرتی یا کرڈاری مل از فیصلہ اجراء نے ڈگری بھی صاحب موصوف کو بشرط ادا سنگل علیحدہ عکاتہ بیروی کا اختیار ہوگا اور تمام ساختہ پر داخلہ صاحب موصوف منسلک کردہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا گرانی یا دیگر ضابطہ مقدمہ مذکورہ کی دوسرے وکیل یا ایئر سٹروکاپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے بشرط قانون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے۔ تاکہ سند رہے

مورثہ 2 April 2021

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد العبد العبد

Accepted

Signature of Arif Ali

A.H.C

Syed Sajid Ali Shah s/o Syed Iqshad Shah

Caste Syed s/o Ejaz Abad Murjali

D-10 Khan

CNIC # 12101-0927601-7

Signature of Syed Sajid Ali Shah

Mob # 03459824541

**BEFORE THE HONOURABLE PESHAWAR HIGH  
COURT, PESHAWAR**

*Service Appeal No. 4762/2021*

Syed Sajid Ali Shah

.....Petitioner

VERSUS


P.P.O and others

.....Respondents

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Deponent



DSP/Legal,  
Elite Fore, Peshawar  
0341-9094099

0300 5899631

①

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No 4762/ 2021

Syed Sajid Ali Shah

... (Appellant)

VERSUS

Govt: of KP etc

... (Respondents)

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 TO 6.**

RESPECTFULLY SHEWETH:

**PRELIMINARY OBJECTIONS:-**

- a) That the appeal is bad for miss-joinder and non-joinder of necessary parties.
- b) That the appeal is not based on facts.
- c) That the appeal is not maintainable in the present form.
- d) That the appeal is badly barred by law & limitation.
- e) That the appellant is estopped to file the appeal by his own conduct.
- f) That the appellant has not come to this Honorable Tribunal with clean hands.
- g) That the appellant has got no cause of action to file instant service appeals.

**FACTS:-**

1. Pertains to personal information of the appellant.
2. Pertains to service record of appellant.
3. Incorrect. The performance of appellant during service was not upto the mark. List of bad entries during service of appellant are annexed as "A". Furthermore, his medical plea is baseless as no record of the same is available with respondent department.
4. Incorrect. Appellant remained absent from his lawful duty without prior permission w.e.f 17.01.2020 to 21.07.2020 and 21.07.2020 to 29.09.2020. Charge sheet with summary of allegations was issued to him. DSP/ Elite Force, DIKhan was appointed as enquiry officer but he failed to appear before him. The enquiry officer recommended to inflict a suitable punishment on him. Consequently, final show cause notice was served to him vide order No. 8921/EF, dated 26.06.2020, (Copy annexed as "B") which was delivered to him through Mr. Muhammad Arif Reader DSP/ Elite Force, DI Khan Region on 08.07.2020. But he failed to turn up & submit his reply. Finally a notice was published in daily newspaper 'Mashriq' dated 15.08.2020, (Copy annexed as "C") wherein appellant was directed to join the inquiry proceedings. But he neither joined the inquiry proceedings nor appeared for duty. All of this showed his lack of interest in official duty. Therefore, he was dismissed from service vide order


- No. 11302-9/EF, dated 29.09.2020 by Respondent No.4 in exercise of powers vested on him vide Police Rules-1975 Amended-2014 Clauses 4b (IV). (Copy annexed as "D")
5. The departmental appeal of the appellant was rejected on merits and being badly time barred vide OB No. 1558, dated 17.03.2021 (Copy annexure as "E")
  6. The mercy appeal of the appellant was rejected vide No. 1143/21, dated 16.03.2021, being time barred and on merit.
  7. The instant Service Appeal is not maintainable on the following Grounds.

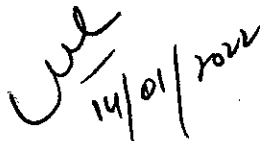
**GROUND:-**


- A. Incorrect. Acts of respondents are quite legal & in accordance with the service law and rules.
- B. Incorrect. The appellant was dealt in accordance with law/ rules and no injustice has been done by the answering respondents.
- C. Incorrect. The appellant was time and again directed to appear before the enquiry officer or submit his reply but he could neither appear nor submit his written reply.
- D. Incorrect. The appellant did not submit his medical documents. In-fact, he remained willfully absent from duty till his dismissal and all codal formalities were adopted by the answering respondents while dealing the appellant departmentally.
- E. Incorrect. Appellant has been treated in accordance with law/ rules and no violation of Articles of Constitution of Islamic Republic of Pakistan, 1973 has been committed by the answering respondents.
- F. Incorrect. The orders of the Competent Authority are legal, and the same have been passed without any malafide intentions against the appellant.
- G. Incorrect. All the codal formalities were observed while dealing the appellant departmentally.
- H. The respondents may also be allowed to raise additional Grounds at the time of hearing of the instant Service Appeal.


**PRAYER:-**

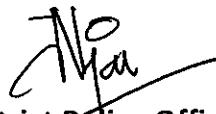
Keeping in view the above, it is humbly prayed that the appeal is not maintainable and is devoid of merits. Hence it is therefore prayed that the same may kindly be dismissed with costs, please.


  
**Deputy Commandant,**  
 Elite Force, Khyber Pakhtunkhwa,  
 Peshawar  
 (Respondent No.4)

  
 14/01/2022  
**Secretary,**  
 Home & Tribal Affairs Department  
 Government of Khyber Pakhtunkhwa,  
 Peshawar  
 (Respondent No.1)

  
 08/12/22  
**Regional Police Officer,**  
 Dera Ismail Khan  
 (Respondent No.5)

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

  
**District Police Officer,**  
 Dera Ismail Khan  
 (Respondent No.6)

  
**Add: IGP / Commandant,**  
 Elite Force, Khyber Pakhtunkhwa,  
 Peshawar  
 (Respondent No.3)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR**

*Service Appeal No. 4762/2021*

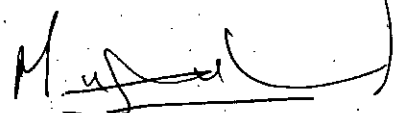
Syed Sajid Ali Shah .....Petitioner

**V E R S U S**

Govt. of KPK and others .....Respondents

**AFFIDAVIT**

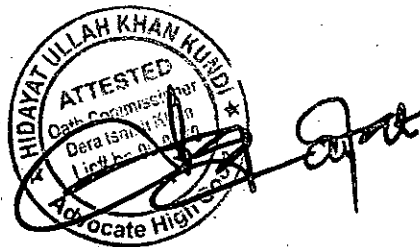
I, Mian Niaz Muhammad, DSP/Legal, Elite Force, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the **Bail Parawise Comments** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.

  
Deponent

CNIC No. 17301-1519386-1


Cell No. 0341-9094099

03005899631



AUTHORITY LETTER.

The undersigned is hereby authorized to nominate Mr. Mian Niaz Muhammad Acting DSP/Legal Elite Force to submit the replies and attend the Honorable High Court/Supreme Court on behalf of respondents.

  
(ASIF IQBAL MOHMAND) PSP  
Deputy Commandant  
Elite Force Khyber Pakhtunkhwa Peshawar

DEPUTY COMMANDANT,  
Elite Force Khyber Pakhtunkhwa  
Peshawar



Name & No. FC Sajid Khan No: 2635 Plt No. 6

District D. I. Khan

Date of Enlistment 27-07-2007

Basic Elite Course No: 05

| S#    | Without Pay                      |            | Total      |
|-------|----------------------------------|------------|------------|
|       | From                             | To         |            |
| 1.    | 06-11-2011                       | 10-11-2011 | "04" days  |
| 2.    |                                  |            |            |
| 3.    | 07-01-2014                       | 09-01-2014 | "02" "     |
| 4.    |                                  |            |            |
| 5.    | 29-01-2014                       | 25-02-2014 | "27" "     |
| 6.    |                                  |            |            |
| 7.    | 06-12-2017                       | 20-12-2017 | "14" "     |
| 8.    |                                  |            |            |
| 9.    | order No: 1657-62/EF D/30 01/20  |            | "32" "     |
| 10.   |                                  |            |            |
| 11.   | order No: 11302-09/EF D/29 09/20 |            | "184" "    |
| 12.   |                                  |            |            |
| 13.   |                                  |            |            |
| 14.   |                                  |            |            |
| 15.   |                                  |            |            |
| 16.   |                                  |            |            |
| 17.   |                                  |            |            |
| 18.   |                                  |            |            |
| 19.   |                                  |            |            |
| 20.   |                                  |            |            |
| 21.   |                                  |            |            |
| 22.   |                                  |            |            |
| Total |                                  |            | "263" days |

Punishments:

Minor  
"01" time Censure  
"01" time warning to  
be careful in  
future.

Major  
Dismissed from Service.

SRC/FMC Elite Force  
27/10/21

## FINAL SHOW CAUSE NOTICE

I, Zaib-Ullah Khan, Deputy Commandant Elite Force Khyber Pakhtunkhwa Peshawar as competent authority under Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014) do hereby serve you Constable Sajid Ali No. 2655 (Platoon No. 99), of Elite Force as follows:-

As per application of I/C Platoon No. 99, you remained absent from Police Lines D.I.Khan without any leave or prior permission w.e.from 19.01.2020 till date.

That consequent upon the completion of enquiry conducted against you by Mr. Yousaf Khan DSP Elite Force D.I.Khan but you did not appear before the enquiry Officer nor submitted any reply of Charge Sheet.

ii. Ongoing through the finding and recommendation of the enquiry officer, the material available on record, I am satisfied that you have committed the omission/commission specified in Police Rules and charges leveled against you have been established beyond any doubt.

2. As a result therefore, I, Zaib Ullah Khan, Deputy Commandant Elite Force, Khyber Pakhtunkhwa Peshawar as competent authority have tentatively decided to impose major penalty upon you, under Police Rules of the said ordinance.

3. You are therefore, directed to show cause as to why the aforesaid penalty should not be imposed upon you.

4. If no reply to this show cause notice is received within seven days of its delivery, in the normal course of circumstances, it shall be presumed that you have no defense to put and in that case an ex-parte action shall be taken against you.

5. A copy of the finding of the Enquiry Officer is enclosed.

  
 (ZAIB ULLAH KHAN)PSP  
 Deputy Commandant  
 Elite Force Khyber Pakhtunkhwa Peshawar

No. 6921 /EF, dated Peshawar the 26/06/2020.

FC Sajid Ali No. 2655 at his home address through reader DSP Elite D.I.Khan.

Handwritten text in the top left corner, possibly a title or header.

Handwritten text in the middle left section, appearing to be a list or index.

Handwritten text in the lower middle left section, possibly a signature or date.

Handwritten text in the bottom left section, possibly a title or header.

Handwritten text in the bottom left section, possibly a signature or date.

Large handwritten text block in the center, possibly a main title or a large section of text.

Handwritten text in the middle right section, possibly a signature or date.

Handwritten text in the bottom right section, possibly a signature or date.

Small circular stamp or mark on the left margin.

273

20

اے ہرگز نہیں کہیں کہ میں نے  
 تم کو کبھی دیکھا ہے  
 نہ تم کو کبھی دیکھا ہے  
 نہ تم کو کبھی دیکھا ہے  
 نہ تم کو کبھی دیکھا ہے

1578  
 1578

## The Police Rules, 1975

(With Amendments-2014)

### Contents

1. Short title, commencement and application
2. Definitions
3. Grounds of punishment
4. Punishments
- 4.A -
5. Punishment proceeding
6. Appeals
7. Procedure of Departmental Inquiry
8. Powers of Inquiry Officer
9. Rules 5 and 6 not to apply in certain cases
10. Procedure of Inquiry against Officers lent to other Government or authority
11. -
12. Appeal
12. Revision (11-A)
13. -
14. Repeal

### Police Rules, 1975

[Gazette of Khyber Pakhtunkhwa, Extraordinary, 27<sup>th</sup> January 1976]

No. SOS-III(S&GAD) 1-80/73-K ---. In exercise of the powers conferred under section 7 of Police Act 1861, the Government of Khyber Pakhtunkhwa, is pleased to make the following Rules, namely:-

#### 1. Short title, commencement and application:-

- (i) These rules may be called the Police Rules, 1975.
- (ii) They shall come into force at once and shall apply to all Police Officers of and below the rank of Deputy Superintendent of Police.

#### 2. Definitions:-

**In these rules, unless the context otherwise requires:-**

- (i) 'Accused' means a Police Officer against whom action is taken under these rules;
- (ii) 'Authority' means authority competent to award punishment as per Schedule
- (iii) 'Misconduct' means conduct prejudicial to good order of discipline in the Police Force, or contrary to Government Servants (Conduct) Rules or unbecoming of a Police Officer and a gentleman, any commission or omission which violates any of the provisions of law and rules regulating the function and duty of Police Officer to bring or attempt to bring political or other outside influence directly or indirectly to bear on the Government or any

Government Officer in respect of any matter relating to the appointment, promotion, transfer, punishment, retirement or other conditions of service of a Police Officer.

- (iv) 'Punishment' means a punishment which may be imposed under these rules by authority as indicated in Schedule I.

3. **Grounds of punishment.-**

Where a Police Officer, in the opinion of the authority-

- a) Is inefficient or has ceased to be efficient; or
- b) Is guilty of misconduct; or
- c) Is corrupt or may reasonably be considered corrupt because-
- (i) He is or any of his dependents or any other person through him or on his behalf is, in possession (for which he cannot reasonably account) of pecuniary resources of property disproportionate to his known sources of income; or
- (ii) He has assumed a style of living beyond his ostensible means; or
- (iii) He has a persistent reputation of being corrupt; or
- (d) Is engaged Or is reasonably suspected of being engaged in subversive activities, or is reasonably suspected of being associated with others engaged in subversive activities or is guilty of disclosure of official secrets to any unauthorized person, and his retention in service is, therefore, prejudicial to national security, the authority may impose on him one or more punishments.

4. **Punishments.-**

1. The following are the minor and major punishments, namely:---

(a) **Minor punishments-**

- (i) Confinement of Constables and Head Constables for 15 days to Quarter Guards;
- (ii) Censure;
- (iii) Forfeiture of approved service up to 2 years;
- (iv) With holding of promotion up to one year;
- (v) Stoppage of increment for a period not exceeding 3 years with or without cumulative effect;
- ❖ (iv) Fine up to Rs15000/- as per schedule-I.

(b) **Major punishments-**

- (i) Reduction in rank/pay;
- (ii) Compulsory retirement;
- (iii) Removal from service; and
- (iv) Dismissal from service.

2. (a) Removal from service does not but dismissal from service does, disqualify for future employment.
- (b) Reversion from an officiating rank is not a punishment.

- (a) In this rule, removal or dismissal from service does not include the discharge of a person.
- (b) Appointed on probation, during the period of probation, or in accordance with the provisions or training rules applicable to him; or
- (c) Appointed, otherwise than under a contract to hold a temporary appointment in the employment of the period of appointment, as
- (d) Appointed under a contract, in accordance with the terms of the contract.

A-4

In case a Police Officer is accused of subversion, corruption or misconduct the Competent Authority may require him to proceed on leave or suspend him.

Punishment proceedings.

The punishment proceedings will be of two kinds, i.e. (a) Summary Police Proceedings and (b) General Police Proceedings and the following procedure shall be observed when a Police Officer is proceeded against under these rules:-

- (1) When information of misconduct or any act of omission or commission on the part of a Police Officer liable for punishment provided in these rules is received by the authority, the authority shall examine the information and may conduct or cause to be conducted such a brief inquiry if necessary, for proper evaluation of the information and shall decide whether the misconduct or the act of omission or commission referred to above should be dealt with in a Police Summary Proceedings in the Orderly Room or General Police Proceedings.
- (2) In case the authority decides that the misconduct is to be dealt with in Police Summary Proceedings, he shall proceed as under-
  - (i) The accused officer liable to be dealt with in the Police Summary Proceedings shall be brought before the authority in an Orderly room.
  - (ii) He shall be apprised by the authority orally the nature of the alleged misconduct etc. The substance of his explanation for the same shall be recorded and if the same is found unsatisfactory, he will be awarded one of the minor punishments mentioned in these rules.
  - (iii) The authority conducting the Police Summary Proceedings may, if deemed necessary, adjourn them for a maximum period of 7 days to procure additional information.
- (3) If the authority decides that the misconduct or act of omission or commission referred to above should be dealt with in General Police Proceedings he shall proceed as under-
  - (a) The authority shall determine if in the light of facts of the case or in the interests of justice a departmental inquiry, through an Inquiry Officer if necessary, is to be held (that is not necessary, he shall-)
  - (b) By order in writing inform the accused of the action proposed to be taken in regard to him and the grounds of the action, and
  - (c) Give him a reasonable opportunity of showing cause against the proposed action.

Government Officer in respect of any matter relating to the appointment, promotion, transfer, punishment, retirement or other conditions of service of a Police Officer.

- (iv) 'Punishment' means a punishment which may be imposed under these rules by authority as indicated in Schedule I.

3. **Grounds of punishment.-**

Where a Police Officer, in the opinion of the authority-

- a) Is inefficient or has ceased to be efficient; or
- b) Is guilty of misconduct; or
- c) Is corrupt or may reasonably be considered corrupt because-
  - (i) He is or any of his dependents or any other person through him or on his behalf is, in possession (for which he cannot reasonably account) of pecuniary resources of property disproportionate to his known sources of income; or
  - (ii) He has assumed a style of living beyond his ostensible means; or
  - (iii) He has a persistent reputation of being corrupt; or
- (d) Is engaged Or is reasonably suspected of being engaged in subversive activities, or is reasonably suspected of being associated with others engaged in subversive activities or is guilty of disclosure of official secrets to any unauthorized person, and his retention in service is, therefore, prejudicial to national security, the authority may impose on him one or more punishments.

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  - (iii) Forfeiture of approved service up to 2 years;
  - (iv) With holding of promotion up to one year;
  - (v) Stoppage of increment for a period not exceeding 3 years with or without cumulative effect;
- ❖
- (iv) Fine up to Rs1 5000/- as per schedule-I.

(b) **Major punishments-**

- (i) Reduction in rank/pay;
- (ii) Compulsory retirement;
- (iii) Removal from service; and
- (iv) Dismissal from service.

2. (a) Removal from service does not but dismissal from service does, disqualify for future employment.
- (b) Reversion from an officiating rank is not a punishment.



that no such opportunity shall be given where the authority is satisfied that in the interest of security of Pakistan or any part thereof it is not expedient to give such opportunity.

(4) If the authority decides that it is necessary to have departmental inquiry conducted, through an Inquiry Officer, he shall appoint for this purpose an Inquiry Officer, who is senior in rank to the accused.

(5) On receipt of the findings of the Inquiry Officer or where no such officer is appointed, on receipt of the explanation of the accused, if any, the authority shall determine whether the charge has been proved or not. In case the charge is proved the authority shall award one or more of major or minor punishments as deemed necessary.

6. Procedure of Departmental Inquiry:-

- i. Where an Inquiry Officer is appointed the authority shall-
  - a. Frame a charge and communicate it to the accused together with statement of the allegations explaining the charge and of any other relevant circumstances which are proposed to be taken into consideration;
  - b. Require the accused within 7 days from the day the charge has been communicated to him to put in a written defence and to state at the same time whether he desires to be heard in person;
- ii. The Inquiry Officer shall inquire into the charge and may examine such oral or documentary evidence in support of the charge or in defence of the accused as may be considered necessary and the witnesses against him.
- iii. The Inquiry Officer shall hear the case from day to day and no adjournment shall be given except for reasons to be recorded in writing and where any adjournment is given,
  - a. It shall not be more than a week; and
  - b. The reasons therefore shall be reported forthwith to the authority.
- iv. Where the Inquiry Officer is satisfied that the accused is hampering, or attempting to hamper the progress of the inquiry he shall administer a warning and if thereafter he is satisfied that the accused is acting in disregard of the warning, he shall record a finding to that effect and proceed to complete the departmental inquiry ex parte.
- v. The Inquiry Officer shall within 10 days of the conclusion of the proceedings or such longer period as may be allowed by the authority, submit his findings and grounds thereof to the authority.

7. Powers of Inquiry Officer:-

- 1) For the purpose of departmental inquiry under these rules, the Inquiry Officer shall have the powers of a Civil Court trying a suit under Code of Civil Procedure, 1908 (Act V of 1908) in respect of the following matters, namely:---
  - (a) Summoning and enforcing the attendance of any person and examining him on oath;

- (b) Requiring the discovery and production of documents;
- (c) Receiving evidence on affidavits;
- (d) Issuing commission for the examination of witnesses or documents.
- 2) The proceedings under these rules shall be deemed to be judicial proceedings within the meaning of sections 193 and 228 of the Pakistan Penal Code (Act XLV of 1860).
8. Rules 5 and 6 not to apply in certain cases.-  
Nothing in rules 5 and 6 shall apply in a case-
- (a) where the accused is dismissed or removed from service or reduced in rank, on the ground of conduct which has led to a sentence of imprisonment; or
- (b) where the authority competent to dismiss or remove a person from service, or to reduce a person in rank, is satisfied that for reasons to be recorded in writing by that authority, it is not reasonably practicable to give the accused an opportunity of showing cause.
9. Procedure of inquiry against officers lent to other Government or Authority.-
- i. Where the services of Police Officer to whom these rules apply are lent to any other Government or to a local or other authority, in this rule referred to as the borrowing authority, the borrowing authority shall have the powers of the authority for the purpose of placing him under suspension or requiring him to proceed on leave and of initiating proceedings against him under these rules.
- ii. Provided that the borrowing authority shall forthwith inform the authority which has lent his services, hereinafter in this rule referred to as the lending authority, of the circumstances leading to the order of his suspension or the commencement of the proceedings, as the case may be.
- iii. If in the light of the findings in the proceedings taken against the Police Officer in terms of sub-rule (1) the borrowing authority is of opinion that any punishment should be imposed on him, it shall transmit to the lending authority the record of the proceedings and thereupon the lending authority shall take action as prescribed in these rules.
10. No party to any proceedings under the rules before the authority or Inquiry Officer shall be represented by an Advocate.
11. Appeal.-  
For rule 11, the following shall be substituted, namely:
- ❖ "11. Appeal.--(1) An accused, who has been awarded any penalty under these rules except the penalty of confinement of constable and head constable for fifteen days to quarter guards, may, within thirty days from the date of communication of the order, prefer an appeal to the Appellate Authority as provided in sub-rule (2).
- (2) The appeal, against the orders of the officer, specified in Schedule-I, who passes it shall lie to the Appellate Authority as may be specified in the table below:

| S.No | Punishing Authorities   | Appellate/Reviewing Authorities  |
|------|---|--|
| 1.   | Provincial Police Officer   | Provincial Police Officer (Review)   |
| 2.   | Regional Police Officer/ Deputy Inspector General of Police/ Capital City Police Officer/ Additional Inspector General of Police. | Provincial Police Officer.   |
| 3.   | District Police Officer/ Senior Superintendent of Police/ Superintendent of Police.   | Regional Police Officer/Deputy Inspector General of Police/ Capital City Police Officer/ Additional Inspector General of Police. |
| 4.   | Assistant Superintendent of Police/ Deputy Superintendent of Police.  | District Police Officer/ Senior Superintendent of Police/ Senior Superintendent of Police Operations.                            |

Provided that where the order has been passed by the Provincial Police Officer, the delinquent officer/official, may within a period of thirty days submit review Petition directly to the Provincial Police Officer.

(3) There shall be only one appeal from the original order and the order of the Appellate Authority, in appeal, shall be final.

(4) The Appellate Authority or Review Authority, as the case may be, may call for the record of the case and comments on the points raised in the appeal or review, as the case may be, from the concerned officer, and on consideration of the appeal or the review petition, as the case may be, by an order in writing-

- (a) uphold the order of penalty and reject the appeal or review petition; or
- (b) set aside the orders and exonerate the accused; or

Amended vide Notification No: 3859/Legal, dated 27/08/2014 issued by IGP, KPX

- (c) modify the orders and reduce or enhance the penalty; or
- (d) set aside the order of penalty and remand the case to the authority, where it is satisfied that the proceedings by the authority or the inquiry officer or inquiry committee, as the case may be, have not been conducted in accordance with the provisions of these rules, or the facts and merits of the case have been ignored, with the directions to either hold a de novo inquiry or to rectify the procedural lapses or irregularities in the proceedings:

Provided that where the Appellate Authority or Review Authority, as the case may be, proposes to enhance the penalty, it shall by an order in writing-

- (a) inform the accused of the action proposed to be taken against him and the grounds of such action; and
- (b) give him a reasonable opportunity to show cause against the action and afford him an opportunity of personal hearing.

(5) An appeal or review preferred under this rule, shall be made in the form of a petition, in writing, and shall set forth concisely the grounds of objection to the impugned order in a proper and temperate language".

12. After rule 11, the following new rule shall be inserted, namely:

❖ **"II-A Revision".....** (1) The Inspector General, Additional Inspector General, a Deputy Inspector General of Police or a Senior Superintendent of Police may call for the records of awards made by their subordinates and confirm, enhance, modify or annul the same, or make further investigation or direct such to be made before passing orders.

(2) If an award of dismissal is annulled, the officer annulling it shall state whether it is to be regarded as suspension followed by re-instatement, or not. The order should also state whether service prior to dismissal should count for pension or not.

(3) In all cases in which officers propose to enhance an award the officer shall, before passing final orders, give the defaulter concerned an opportunity of showing cause, either personally or in writing, why his punishment should not be enhanced.

(4) The revision petition shall lie or taken cognizance by the authorities under sub rule-(1) within thirty days of the order passed on original appeal.

Provided that the Provincial Police Officer, while acting as revisional authority, in certain cases, may constitute a Revision Board for the speedy disposal of revision petitions, before passing any orders." And

13.

No order passed under these rules shall be subject to review by any Court/Tribunal.

14.

**Repeal.-**

Any Disciplinary Rules applicable to Police Officers to whom these rules apply are hereby repealed but the repeal thereof shall not affect any action taken or anything done or suffered there under.

**NASIR KHAN DURRANI (PSP)**  
**Inspector General of Police,**  
**Provincial Police Officer,**  
**Khyber Pakhtunkhwa, Peshawar.**

❖ SCHEDULE-I

| POWER OF PUNISHMENT TABLE |   |  |                                |  |                            |                       |                       |
|---------------------------|---|--|--------------------------------|--|----------------------------|-----------------------|-----------------------|
| S<br>#                    | DEPARTMENTAL PUNISHMENTS  | AUTHORITIES COMPETENT TO AWARD PUNISHMENT TO:                                    |                                |  |                            |                       |                       |
|                           |   | Deputy Superintendent of<br>Police/Deputy<br>Superintendent of Police<br>(Legal) | Inspector/<br>Inspector(Legal) | Sub Inspector/<br>Sub Inspector<br>Legal | Assistant Sub<br>Inspector | Head Constable        | Constable             |
| 1.                        | <b>A-Major Punishments:</b>   |  |                                |  |                            |                       |                       |
|                           | (i) Dismissal, removal from service, compulsory retirement.   | Provincial Police Officer  | DPO/SSP                        | DPO/SSP                                  | DPO/SSP/SP                 | DPO/SSP/SP            | DPO/SSP/SP            |
|                           | (ii) Reduction from substantive rank to lower rank or from higher stage to lower stage in the same time scale of pay. | Provincial Police Officer  | DPO/SSP                        | DPO/SSP/SP                               | DPO/SSP/SP                 | DPO/SSP/SP            | DPO/SSP/SP            |
|                           | <b>B-Minor Punishments:</b>   |  |                                |  |                            |                       |                       |
|                           | Withholding of promotion for one year or less.  | PPO/Addl: IGP/CCPO/RPO/DIG   | DPO/SSP/SP                     | DPO/SSP/SP                               | DPO/SSP/SP/ASP/DSP         | DPO/SSP/SP/ASP/DSP    | DPO/SSP/SP/ASP/DSP    |
| 1.                        | (i) Fine up to rupees Fifteen thousand (15000/-)  | Provincial Police Officer  | ---                            | ---                                      | ---                        | ---                   | ---                   |
|                           | (ii) Fine up to rupees Ten thousand (10000/-)   | Addl: IGP/CCPO   | ---                            | ---                                      | ---                        | ---                   | ---                   |
|                           | (iii) Fine up to rupees Ten thousand (10000/-)  | RPO/DIG  | ---                            | ---                                      | ---                        | ---                   | ---                   |
|                           | (iv) Fine up to rupees Five thousand (5000/-)   | ---  | DPO/SSP/SP                     | DPO/SSP/SP                               | DPO/SSP/SP<br>ASP/DSP      | DPO/SSP/SP<br>ASP/DSP | DPO/SSP/SP<br>ASP/DSP |
|                           | (v) Fine up to rupees one thousand (1000/-)   | ---  | ---                            | ---                                      | ---                        | ---                   | ---                   |
| 4.                        | Stoppage of increments for a period not exceeding three (3) years with or without cumulative effect.                  | PPO/Addl: IGP/CCPO/RPO/DIG   | DPO/SSP/SP                     | DPO/SSP/SP                               | DPO/SSP/SP/ASP/DSP         | DPO/SSP/SP/ASP/DSP    | DPO/SSP/SP/ASP/DSP    |
| 5.                        | Censure   | PPO/Addl: IGP/CCPO/RPO/DIG   | DPO/SSP/SP                     | DPO/SSP/SP                               | DPO/SSP/SP/ASP/DSP         | DPO/SSP/SP/ASP/DSP    | DPO/SSP/SP/ASP/DSP    |
| 6.                        | Forfeiture of approved service up to two (2) years  | PPO/Addl: IGP/CCPO/RPO/DIG   | DPO/SSP/SP                     | DPO/SSP/SP                               | DPO/SSP/SP/ASP/DSP         | DPO/SSP/SP/ASP/DSP    | DPO/SSP/SP/ASP/DSP    |
| 7.                        | Confinement to quarters guard up to fifteen (15) days of Constables and Head constables.                              | ---  | ---                            | ---                                      | ---                        | DPO/SSP/SP/ASP/DSP    | DPO/SSP/SP/ASP/DSP    |



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

No. SI/ 1143 /21, dated Peshawar the 16/03 /2021.

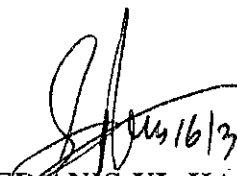
To : The Commandant,  
Elite Force,  
Khyber Pakhtunkhwa, Peshawar.

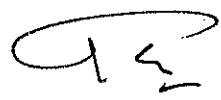
Subject: REVISION PETITION.


Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-FC Sajid Khan No. 2655 of Elite Force against the punishment of dismissal from service awarded by Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar vide order Endst: No. 11302-09/EF, dated 29.09.2020, being time barred.

The applicant may please be informed accordingly.

  
(SYED ANIS-UL-HASSAN)  
Registrar,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

0A8j/FMC  
  
12/3

  
15/3

D. No. 1558  
Date 17.3.2021  
Commandant Elite Force

**BEFORE THE HONOURABLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. 4762/2021

Syed Sajid Ali Shah

**Versus**

Govt. of KPK and others

**REJOINDER ON BEHALF OF APPELLANT**

Respectfully Sheweth:-

**REPLY ON PRELIMINARY OBJECTIONS:-**

- a. That the appeal was filed against the necessary parties.
- b. That the appeal is based on facts, and nothing has been concealed from this honourable court.
- c. That the appeal in its present form is maintainable in the eye of law.
- d. That the appeal filed by the appellant is well within time, hence, para is misconceived.
- e. That the appellant being aggrieved sub ordinate employee has been removed from service, hence, the instant appeal is maintainable in its present form, hence, appellant has got clear locus standi and para is misconceived.

That the answering respondent has not explained that how the appellant has come to this Honourable tribunal with unclean hands, hence, this para is denied.

- g. That the appellant has been removed from service a stroke of pen, hence, the appellant being aggrieved, therefore, the appeal is maintainable in its present form and attending circumstances, this para is denied.

**OBJECTIONS ON FACTS:-**

- 1) Admitted by the respondents, hence, needs no reply.
- 2) Admitted by the respondents, hence, needs no reply.

*S. Sajid Ali Shah*  
28/9/21



- 3) That Para#3 is incorrect, the appellant served the department with great zeal and to the entire satisfaction of his superior but suddenly, in the month of January 2020, the appellant became the patient of decease/ pain "SHAITICA". In this respect medical record of the appellant is already annexed with the appeal.
- 4) That Para No.4 is incorrect, medical record of the appellant shows that appellant remains absent due to his illness, therefore no notice or final show cause notice was not personally served on the appellant to appear before the inquiry officer.
- 5) That Para No.5 is incorrect, the appellant filed the first appeal within time before the commandant elite force KPK, in this respect postal receipt at page No. 47 of the appeal shows that appeal was filed by the appellant within time and there is no delay on the part of the appellant, copy of the first appeal was misplaced by the office of the commandant elite force KPK Peshawar. Later on office of the commandant elite force KPK was shifted to district Noshehra therefore petitioner filed 2<sup>nd</sup> appeal before the commandant elite force KPK.
- 6) That para No. 6 is incorrect, Service appeal of the appellant was filed against the order of respondent No. 3 within time, therefore no question of time barred arise.
- 7) Incorrect and misconceived. The departmental appeal is submitted by the appellant, hence, maintainable in the eye of law.

**OBJECTION ON GROUNDS:**

- A. Incorrect and misconceived. Actually the answering respondents are denying their own valid order as evident from the record. Hence, this para is totally denied.
- B. Incorrect, the appellant was not legally communicated the impugned order passed by the respondent No.4, due to his decease, the appellant has no knowledge about the

*Asad*  
*28/9/2022*

proceedings of the i.O, the whole proceedings was carried out in absentia of the appellant.

- C. That para # C is incorrect.
- D. That Para No.D is incorrect, the appellant submits his medical documents before the DSP elite Force through his brother because the appellant was ill.
- E. That Para No.E is incorrect ,needs no reply. Detail reply is given in above paras.
- F. That Para No.F is incorrect ,needs no reply. Detail reply is given in above paras.
- G. That Para No. G is incorrect, no codal formalities were observed by the answering respondents.
- H. That the counsel for appellant allowed to raise additional grounds at the time of arguments.

**It is therefore, humbly prayed that appeal of the appellant may kindly be accepted as prayed for in the head note of the main appeal.**

**Any other relief deems appropriate may please be given to the appellant.**

Dated: 98/09/2022

Yours Humble Appellant

  
**Syed Sajid Ali Shah**  
Through Counsel

  
**Syed Taj Ali Shah**  
Advocate High Court

**BEFORE THE HONOURABLE SERVICE TRIBUNAL**  
**KHYBER PAKHTUNKHWA PESHAWAR**

Service Appeal No. 4762/2021

Syed Sajid Ali Shah

**Versus**

Govt. of KPK and others

**REJOINDER ON BEHALF OF APPELLANT**

**AFFIDAVIT**

I, Syed Sajid Ali Shah S/O Syed **Irshad Hussain shah caste syed**  
**R/O Ijaz Abad Muryali Tehsil & District Dera ismail Khan,**  
**bearing CNIC # 12101-0977601-7,** the appellant, do hereby  
solemnly affirm and declare on Oath that contents of the Rejoinder  
are true and correct to the best of my knowledge and belief; and  
nothing has been deliberately concealed from this Honourble Court.

Dated: 28/09/2022

  
**DEPONENT**