

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

Service Appeal No.14224/2020

Date of Institution ... 13.11.2020  
Date of Decision ... 19.09.2022

Umar Khan S/O Gulzeb Khan (Constable No.4641 FRP KPK)  
Mohallah Dalian, PO Bagra, Village Bandi Sher Khan, Tehsil &  
District Abbottabad.

... (Appellant)

**VERSUS**

Provincial Police Officer Khyber Pakhtunkhwa, Peshawar and  
three others.

... (Respondents)

Muhammad Aslam Tanoli, ... For appellant  
Advocate

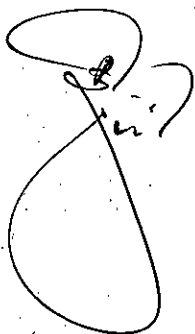
Kabir Ullah Khattak, ... For respondents.  
Additional Advocate General

Rozina Rehman ... Member (J)  
Fareeha Paul ... Member (E)

**JUDGMENT**

ROZINA REHMAN, MEMBER (J): The appellant has invoked the  
jurisdiction of this Tribunal through above titled appeal with the prayer  
as copied below:

“On acceptance of instant service appeal order  
dated 26.02.2020 and 14.10.2020 of respondents may  
graciously be set aside and the appellant be  
reinstated in his service from the date of dismissal  
with grant of consequential service back benefits.”




2. The relevant facts leading to filing of instant appeal are that appellant was inducted in District Police, Haripur as a Constable on 30.05.2013. He suffered from cardiac disease in the year 2017 and started his regular medical treatment. He was transferred to District Lower Kohistan on 15.07.2019 and therefore, applied for 07 days casual leave in order to get medical treatment and to try his luck for his transfer to Abbottabad or Haripur. He appeared before the then SP FRP Hazara Range, Abbottabad but his request was not considered. On the following day, he appeared before the Commandant FRP Khyber Pakhtunkhwa and accordingly he was directed to appear before the Medical Board for medical checkup. It took two months and he was allowed by the Officer Incharge Police Lines to remain at his home. On appearing before the Medical Board, he was declared physically fit for joining duty. He continued his medical treatment but his salary was stopped and after some time, he was transferred from Kohistan to District Haripur. He joined his duties at District Haripur on 26.12.2019. He once again fell ill on 29.01.2020, therefore, he informed his officers with the request for leave and release of salary and lastly he received a letter of dismissal from service on 26.02.2020. Feeling aggrieved, he filed departmental appeal which was rejected, hence, the present service appeal.

3. The respondents were summoned and they attended the Tribunal. Several opportunities were given for submission of comments but to no avail and vide order sheet dated 21.12.2021 their right for submission of reply was struck off.

4. We have heard appellant and Muhammad Aslam Tanoli Advocate learned counsel for appellant and Kabir Ullah Khattak, Additional Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

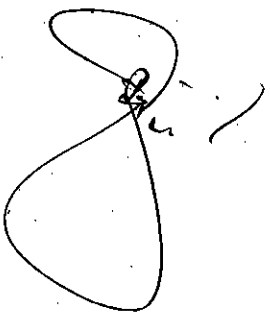
5. Muhammad Aslam Tanoli Advocate, learned counsel appearing on behalf of appellant contended with vehemence that impugned orders dated 26.02.2020 and 14.10.2020 are illegal, against law and facts, hence, are liable to be set aside. He contended that the impugned orders were passed without fulfilling the codal formalities as he was not treated in accordance with law and rules on the subject and they acted in violation of Article-4 of the Constitution of Islamic Republic of Pakistan, 1973. It was further submitted that the absence of the appellant was not intentional and deliberate rather due to his illness and circumstances beyond his control, hence, he may kindly be reinstated in service with all back benefits.



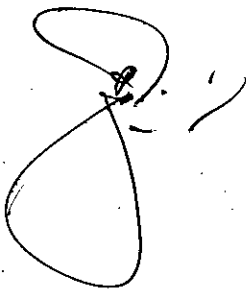
6. Conversely learned AAG submitted that the appellant remained absent from duty for a long period without any leave or prior permission of the competent authority. He remained absent from duty w.e.f 30.07.2019 to 03.09.2019 for 33 days, from 06.09.2019 to 24.12.2019 and 29.01.2020 till the date of removal from service i.e. 26.02.2020 for a period of 134 days, thus remained absent from lawful duty for total period of 167 days. Regarding his illness, he was referred to medical checkup before Standing Medical Board at BBS Teaching Hospital, Abbottabad dated 29.07.2019 and after examination by Standing Medical Board, it was reported that appellant

was physically and mentally fit to continue his job. Lastly, he submitted that on the allegation of willful absence, he was issued charge sheet with statement of allegations and Inspector Aftab Khan was nominated as Inquiry Officer to unearth the hidden facts, whereafter, final show cause notice was issued which was served upon his brother through special messenger and again inquiry was entrusted to the Inquiry Officer but he deliberately failed to submit his reply and accordingly he was awarded major punishment of removal from service vide order dated 26.02.2020.

7. 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 departmental inquiry was initiated against appellant for his willful absence. He was served with charge sheet and summary of allegations and one Aftab Khan Inspector FRP Manshera was appointed as Inquiry Officer. He submitted his reply to the Inquiry Officer wherein he stated to be a patient of Neuro. The Inquiry Officer found him guilty and recommended that absence period be treated as leave without pay. Upon the report of Inquiry Officer final show cause notice was issued which was received by his brother on 29.10.2019 but he failed to attend the inquiry proceedings. He once again absented himself from official duty from 06.09.2019 to 24.12.2019 (109 days) and he submitted application before Deputy Commandant FRP Peshawar by stating that he is chronic patient. After his appearance, the Senior Superintendent of Police FRP was directed by the office of Deputy Commandant to get medically examined the



appellant through Medical Board. Learned AAG submitted letter No.1084 dated 29.07.2019 of Superintendent of Police FRP addressed to the Medical Superintendent BBS, Teaching Hospital Abbottabad for the constitution of Standing Medical Board. The opinion of the Standing Medical Board was also produced bearing No.5397 dated 29.08.2019 vide which appellant was declared physically and mentally fit to continue his job in Kohistan. From the contents of appeal it is evident that the appellant after reporting his arrival in District Kohistan, remained absent w.e.f 30.07.2019 till the date of his removal from service. Accordingly, he was awarded major punishment of removal from service vide order dated 26.02.2020. He preferred departmental appeal which is available on file and is undated. His departmental appeal was decided on 14.10.2020. He was given the opportunity of personal hearing in Orderly Room held on 08.10.2020. During the course of personal hearing, appellant failed to present any justification regarding his prolonged absence and accordingly, his appeal was rejected on merits as well as being time barred. Learned counsel badly failed to justify presence of appellant.



8. Learned counsel was asked in respect of the departmental appeal filed by the appellant as to when the same was presented before the appellate authority but he failed to apprise this Bench in respect of the exact date.

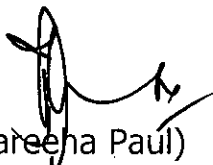
9. It is well-entrenched legal proposition that when an appeal before departmental authority is time barred, the appeal before Service Tribunal would be incompetent. In this regard reference can be made to cases titled Anwarul Haq v. Federation of Pakistan

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.

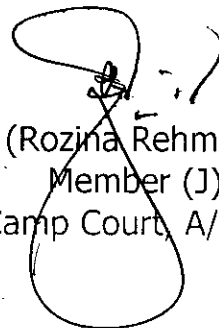
10. Having considered the matter from all angles in the light of material available on file, we do not find any merit in the instant service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

19.09.2022



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



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

ORDER  
19.09.2022

Appellant present through counsel.

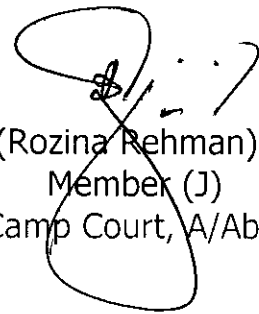
Kabir Ullah Khattak, Additional Advocate General  
alongwith Muhammad Israr Reader for respondents present.  
Arguments heard. Record perused.

Vide our detailed judgment of today of this Tribunal  
placed on file, 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.  
19.09.2022



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



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

17.03.2022


Due to retirement of the Hon'ble Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same on 19.05.2022.


  
Reader

19.05.2022

Learned counsel for the appellant present. Syed Naseer Ud Din, Assistant Advocate General alongwith Mr. Azam Ali Shah, DSP for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. To come up for arguments before D.B on 18.07.2022 at camp court Abbottabad.

  
(Fareeha Paul)  
Member(E)


  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

18<sup>th</sup> July 2022

Learned counsel present. Mr. Noor Zaman, District alongwith Mr. Azam Ali Shah, DSP(Legal) for respondents present.

Learned counsel for the appellant sought adjournment to further prepare the case. Adjourned. To come up for arguments on 19.09.2022 before D.B at camp court Abbottabad.

  
(Salah Ud Din)  
Member(Judicial)

  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad



12.07.2021

Due to COVID- 19, tour to Abbottabad has been cancelled, therefore, case to come up for the same as before on 12.10.2021.



Reader

12.10.2021

Counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Written reply/comments of the respondents are still awaited. Learned AAG is required to ensure submission of written reply of respondents on the next date positively. In case they fail to submit reply on next date, their right for submission of reply/comments shall be deemed as struck off. Case to come up on 21.12.2021 before the S.B at camp court, Abbottabad.

21.12.2021

Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Chairperson, Camp Court, A/AG for respondents present.

Respondents have failed to submit their written reply/comments today. Vide previous order sheet dated 12.10.2021 it was directed that the respondent shall positively submit their written reply/comments on the next date failing which their right for submission of reply/comments shall be deemed as struck off. The right of submission of written reply/comments of respondents thus stands struck off. To come up for arguments before D.B on 17.03.2022 at camp court Abbottabad.



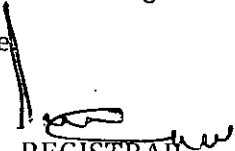

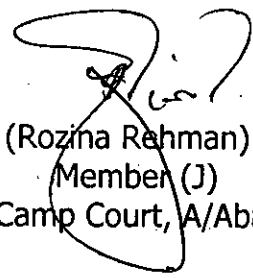
(Salah Ud Din)  
Member(J)

Camp Court Abbottabad

## FORM OF ORDER SHEET

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

Case No.- 14224 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/11/2020	<p>The appeal of Mr. Umar Khan presented today by Mr. Muhammad Aslam Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>16.03.2021</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>16.03.2021</p> <p>Appellant present through counsel. Preliminary arguments heard. File perused.</p> <p>Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to respondents for reply/comments. To come up for written reply/comments on <u>12/07/2021</u> before S.B at Camp Court, Abbottabad.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J) Camp Court, A/Abad</p>

App: \_\_\_\_\_  
 Sec: \_\_\_\_\_  
 Deposited  
 Process Fee

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Appeal No.....

Umar Khan S/O Gulzeb Khan (Constable No. 4641 FRP KPK)  
Mohallah Dalian, PO Bagra, Village Bandi Sher Khan, Tehsil &  
District Abbottabad.

**Appellant**

**VERSUS**

1. Provincial Police Officer, K.P.K. Peshawar
2. Commandant FRP, K.P.K. Peshawar.
2. Deputy Commandant FRP Force, K.P.K., Peshawar.
4. Senior Superintendent of Police, F.R.P., Hazara Region,  
Abbottabad.

**Respondents**

**SERVICE APPEAL**


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**Appellant**

Through

  
(Mohammad Aslam Tanoli)  
Advocate High Court  
at Haripur

Dated: **13**-11-2020

L

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Appeal No.....14224/20

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 14649

Dated 13/11/2020

Umar Khan S/O Gulzeb Khan (Constable No. 4641 FRP KPK)  
Mohallah Dalian, PO Bagra, Village Bandi Sher Khan, Tehsil &  
District Abbottabad.

**Appellant**

**VERSUS**

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3. Deputy Commandant FRP Force, K.P.K., Peshawar.
4. Senior Superintendent of Police, F.R.P., Hazara Region,  
Abbottabad.

**Respondents**

**SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL  
ACT 1974 AGAINST ORDER DATED 26-02-2020 OF SENIOR  
SUPERINTENDENT OF POLICE FRP KPK PESHAWAR WHEREBY  
APPELLANT HAS BEEN DISMISSED FROM SERVICE AND ORDER  
DATED 14-10-2020 WHEREBY HIS DEPARTMENTAL APPEAL HAS  
BEEN REJECTED.**

**PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL ORDER  
DATED 26-02-2020 AND 14-10-2020 OF RESPONDENTS MAY  
GRACIOUSLY BE SET ASIDE AND THE APPELLANT BE REINSTATED IN  
HIS SERVICE FROM THE DATE OF DISMISSAL WITH GRANT OF  
CONSEQUENTIAL SERVICE BACK BENEFITS.**

Respectfully sheweth"

1. That appellant was inducted in District Police Haripur as a constable on 30-05-2013. Subsequently on 01-01-2019, he was transferred in FRP Hazara Range Abbottabad. He always performed his assigned duties with devotion, dedication and honesty to the entire satisfaction of his superiors.

Defence of  
respondent  
struck off  
vide order  
dt: 21/12/21

Filed to-day

Registrar  
13/11/2020

2. That in the year 2017, the appellant suffered with cardiac disease and he started his regular medical treatment. While appellant performing his duties at Police Post Sera-e-Saleh, Haripur on 14-07-2019, he was transferred to District Lower Kohistan where he assumed his duties on 15-07-2019. Due to his illness and there being no arrangement of medical treatment at District Kohistan, the appellant had to suffer a lot of difficulties, therefore he took 07 days casual leave in order to get medical treatment and get transferred himself to Abbottabad or Haripur. Appellant appeared before the then Acting SP FRP Hazara Range Abbottabad with the request for his transfer from Kohista to Abbottabad or Haripur but his request was not granted. Whereupon the very next day appellant appeared before the Commandant FRP KPK at Peshawar for said purposes, however the Commandant directed him to appear before the Medical Board for medical check-up. It took about 02 months in conducting Medical Board. The appellant was allowed by his Officer Incharge Police Lines to remain at his home. On his appearance before the Medical Board, the appellant was declared physically fit for joining duty. But thereafter the appellant was again feeling not good as he was ill as usual. He kept continued his medical treatment. **(Copies of medical treatment record are attached herewith as Annexure- "A" pages).**
3. That appellant's salary had been stopped. He had no money for his medical treatment as well as other requirement of daily use. However, after posting of a new

Superintendent of Police Hazara Range Abbottabad (Mr. Aziz Khan Afridi) who called the appellant in his office and heard him with regard to his illness. He was kind enough to transfer the appellant from Kohistan to District Haripur for having his medical treatment over there. Appellant then joined his duties at District Haripur on 26-12-2019. Unfortunately, the appellant again fell ill on 29-01-2020 and he informed his officers, submitted medical certificates and requested for grant of leave. Appellant also requested for release of his salary. But his salary was not released though he had discharged his duties. The appellant had nothing for his livelihood and medical treatment. He was under drastic financial stresses. But there was no one to help him financially rather thereafter the appellant received a letter of dismissal from service on 26-02-2020. **(Copy of Order dated 26-02-2020 is attached as Annexure-"B")**.

4. That no proper departmental inquiry was conducted. No Show Cause Notice was issued to him. Enquiry findings, if any, were never provided to the appellant. Even opportunity of personal hearing was not provided to him. He was condemned unheard.
5. That appellant aggrieved of the order dated 26-02-2020 of Senior Superintendent of Police FRP Hazara Region Abbottabd preferred a departmental appeal to the Commandant FRP, KPK, Peshawar. **(Copy of departmental appeal is attached as Annexure "C")**.

6. That the Deputy Commandant FRP KPK, Peshawar without giving any heed to the grounds agitated by appellant in his departmental appeal decided and rejected the same at his own accord vide order dated 14-10-2020 instead of placing the same before the competent appellate authority. **(Copy of order dated 14-10-2020 is attached as Annexure-"D")**.

Hence instant service appeal, inter alia, on the following as well as other grounds:-

**GROUND:**

- a) That impugned orders dated 26-02-2020 and dated 14-10-2020 of the respondents are illegal, unlawful against the facts, departmental rules and regulations and principle of natural justice hence are liable to be set aside.
- b) That appellant was appointed as Constable in the District Police Haripur and he was transferred to FRP Hazara Region Abbottad on 01-01-2019. Appellant's dismissal order as well as appellate order was illegal, void ab-initio and coram non iudice.
- c) That impugned orders were passed without fulfilling the legal procedural requirements as envisaged by E&D Police Rules 1975.
- c) That respondents have not treated the appellant in accordance with law, departmental rules & regulations and policy on the subject and have acted in violation of

Article-4 of constitution of Islamic Republic of Pakistan 1973.

- d) That appellate authority has also failed to abide by the law and even did not take into consideration the grounds taken by appellant in the memo of appeal and has filed the appeal. Thus act of respondent is contrary to the law as laid down in the KPK Police Rules 1934 read with section 24-A of General Clause Act 1897 and Article 10-A of the Constitution of Islamic Republic of Pakistan 1973.
- e) That appellant is the only bread earner of his family and is jobless since his dismissal from service. He has no source of income to live on. He is facing financial hardships in these days of high dearness.
- f) That appellant's absence was not deliberate or intentional rather due to his illness and circumstances being beyond his control, hence appellant deserves to be reinstated in his service and he be granted leave on medical grounds.
- g) That instant appeal is well within time and this honorable Service Tribunal has got every jurisdiction to entertain and adjudication upon the same.

**PRAYER:**


It is, therefore, humbly prayed that on acceptance of instant Service Appeal order dated 26-02-2020 and 14-10-2020 of respondents may graciously be set aside and the appellant be



reinstated in service from the date of dismissal with grant of all consequential service back benefits. Any other relief which this Honorable Service Tribunal deems fit and proper in circumstances of the case may also be granted.

  
Appellant

Through:

  
(Mohammad Aslam Tanoli)  
Advocate High Court  
At Haripur

Dated 13 -11-2020

### VERIFICATION

It is verified that the contents of instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed thereof.



Dated 13 -11-2020

Appellant

Appellant

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Umar Khan S/O Gulzeb Khan (Constable No. 4641 FRP KPK)  
Mohallah Dalian, PO Bagra, Village Bandi Sher Khan, Tehsil &  
District Abbottabad.

**Appellant**

**VERSUS**

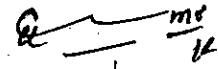
1. Provincial Police Officer, K.P.K. Peshawar
2. Commandant FRP, K.P.K. Peshawar.
2. Deputy Commandant FRP Force, K.P.K., Peshawar.
4. Senior Superintendent of Police, F.R.P., Hazara Region,  
Abbottabad.

**Respondents**

**SERVICE APPEAL**

**CERTIFICATE**

It is certified that no such Appeal on the subject has ever been  
filed in this Honorable Service Tribunal or any other court prior to  
instant one.



**APPELLANT**

Dated: 13-11-2020

**BEFORE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Umar Khan S/O Gulzeb Khan (Constable No. 4641 FRP KPK)  
Mohallah Dalian, PO Bagra, Village Bandi Sher Khan, Tehsil &  
District Abbottabad.

**Appellant**

**VERSUS**

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2. Commandant FRP, K.P.K. Peshawar.
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4. Senior Superintendent of Police, F.R.P., Hazara Region,  
Abbottabad.

**Respondents**

**SERVICE APPEAL**

**AFFIDAVIT:**

I, Umar Khan appellant do hereby solemnly declare and affirm on oath that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honorable Service Tribunal.



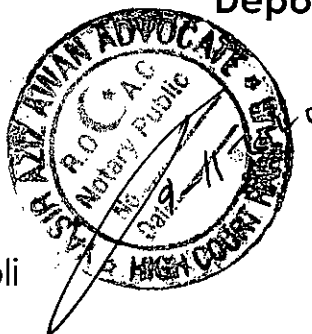
**Deponent/Appellant**

Dated: 13-11-2020

Identified By:



Mohammad Aslam Tanoli  
Advocate High Court  
At Haripur



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

Umar Khan S/O Gulzeb Khan (Constable No. 4641 FRP KPK) Mohallah Dalian, PO Bagra, Village Bandi Sher Khan, Tehsil & District Abbottabad. **Appellant**

**VERSUS**

- 1. Provincial Police Officer, K.P.K. Peshawar
- 2. Commandant FRP, K.P.K. Peshawar.
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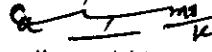
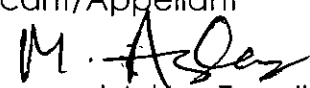
**Respondents**

**APPLICATION FOR CONDONATION OF DELAY IN FILING SERVICE APPEAL BEFORE THIS HONOURABLE SERVICE TRIBUNAL.**

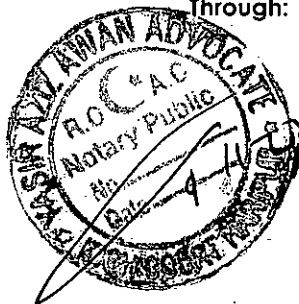
Respectfully Sheweth:

- 1. That applicant/appellant has filed today a Service Appeal, which may be considered as part and parcel of this application, against order dated 26-02-2020 and 14-10-2020 passed by respondents, whereby appellant has been dismissed from service and his department appeal has also been rejected without jurisdiction, and abiding by procedure.
- 2. That as the orders of departmental authorities have been passed in violation and derogation of the statutory provisions governing the terms and condition of service of the appellant and facts of the case, therefore, causing a recurring cause of action to the applicant/appellant can be challenged and questioned irrespective of a time frame.
- 3. That though appellant on receipt of order of Deputy Commandant FRP KPK Peshawar had filed departmental appeal well in time but was rejected. That appellant has rigorously been pursuing his case. Therefore, the delay, if any, in filing instant service appeal is due to the forgoing reasons.
- 4. That instant application is being filed as an abundant caution for the condonation of delay, if any. The impugned orders are liable to be set aside in the interest of justice.

It is, therefore, respectfully prayed that on acceptance of the instant application the delay, if any, in filing of titled appeal may graciously be condoned.

  
Applicant/Appellant  
  
(Mohammad Aslam Tanoli)  
Advocate High Court  
Haripur

Through:

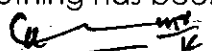


Dated: 13-11-2020

**Affidavit:**

It is verified that the contents of the instant application/ appeal are true and correct to the best of my knowledge & belief & nothing has been suppressed.

Dated: 13-11-2020

  
Applicant/Deponent

Annex - A

EMERGENCY Rs.10/-  
DHQ HOSPITAL HARIPUR  
OUT-PATIENTS DEPARTMENT

(26 sheets)

NAME V G E  
YEARLY NO. 1400  
DATE 5/24/69  
DISEASE \_\_\_\_\_

FACE VALUE RUPEES 10/-

Krish Kumar  
Sunder  
SP  
AD  
ET

*[Signature]*  
Krish Kumar  
ET

Alleded

*[Signature]*  
ms  
K

11

EMERGENCY Rs.10/-  
**DHQ HOSPITAL HARIPUR**  
OUT-PATIENTS DEPARTMENT

FACE VALUE RUPEES 10/-

NAME                                   
YEARLY NO.                                   
DATE                                   
DISEASE                                 

Refn to  
Psychiatrist

Accepted  
A. M. K.

Rs. 10/-

# DHQ HOSPITAL HARIPUR

OUT-PATIENTS DEPARTMENT

FACE VALUE RUPEES 10/-

NAME \_\_\_\_\_ *محمد عزیز*

YEARLY NO. 2933

DATE \_\_\_\_\_ *24/02*

DISEASE \_\_\_\_\_

*Referred to Dr. Zafar*

*Hayat*

- *Dr. Khan*  
*at Chest*
- *Epi dysentery*
- *at Stomach*

P

*① TB Introl 10g*  
*2 + 2 + 2*

*② TB secinum 8mg*  
*1/2 + 1/2*

*B.T.O*

*Allied*

*<sup>MY</sup>  
                     <sub>12</sub>*

13

EMERGENCY

Rs. 10/-

DHQ HOSPITAL HARIPUR

OUT-PATIENTS DEPARTMENT

NAME U6  
YEARLY NO. 2171  
DATE 5/05/18  
DISEASE \_\_\_\_\_

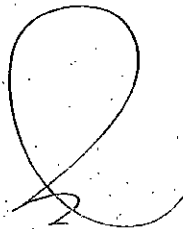
FACE VALUE RUPEES 10/-

Rx

Duo Dyclo  
F/M

TDS Noricam  
r 1

TDS Kaleool D  
L/12, (1)



Alledid  
Mr  
K



14

EMERGENCY Rs. 10/-  
**DHQ HOSPITAL HARIPUR**  
**OUT-PATIENTS DEPARTMENT**

FACE VALUE RUPEES 10/-

NAME \_\_\_\_\_

*Chandra*

YEARLY NO \_\_\_\_\_

*482*

DATE \_\_\_\_\_

*1/7/15*

DISEASE \_\_\_\_\_

Adv.

ECC

D

*0.9 Zantac @ 1M*

*TS. Dexin  
(1.7)*

*Susp. Minto  
(2-2-2)*

D

*Allesid*  
*ms*  
*u*



EMERGENCY Rs.10/-  
**DHQ HOSPITAL HARIPUR**  
OUT-PATIENTS DEPARTMENT

FACE VALUE RUPEES 10/-

NAME Umar Khan  
YEARLY NO. 2171  
DATE 26/07/19  
DISEASE \_\_\_\_\_

Adv.  
ECS

B.P.

162  
100

1st Capoten

Handwritten notes in Urdu script, including "پہلے سے استعمال ہو رہا ہے" and "20/11/19".

[Signature]  
26-7-19

Allostered

[Signature] mb  
12



OPD TICKET PRESENTATION



OUT PATIENT DEPARTMENT TICKET

BHU: Bandi Sher Khan Yearly OPD No:

Monthly OPD No: 165 Date: 6-8-19 Daily OPD No:

Patient's Name: Umar Khan Age: 25y Sex:  M  F

Father / Inisba's Name:  Contact # (if Possible)

Address: Bandi

Problem/Disease Diagnosed: Trauma

Patient Seen By: BP

PRESCRIPTION / TREATMENT SUGGESTED

C  
6  
Severe  
Trauma of  
Head & Neck

Ty. Dycl 1 sk  
M

Ty. Desmethylam  
1 sk  
M

Refer to  
Neuro Surgeon  
Abbottabad Complex

CT-P  
BP  
120  
80

MAI  
Board  
Council  
Spinal

MA  
Incharge  
Basic Health Unit  
Bandi Sher Khan Haripur

BP 120/80

Signature of MO / INCHARGE: [Signature]

پیشکش کنندہ کے نام اور پتہ لکھ کر مندرجہ ذیل پر لکھیں۔

Alister  
ca  
ms  
12

EMERGENCY Rs.10/-  
**DHQ HOSPITAL HARIPUR**  
OUT-PATIENTS DEPARTMENT

FACE VALUE RUPEES 10/-

NAME Ullas

YEARLY NO. 2651

DATE 29-7-09

DISEASE \_\_\_\_\_

Head  
Pain  
e Stomach  
SY. Mucous  
no. 2, 2  
, 5

B.P.  
100/70  
Tat. 100/100  
1-1-1  
7-7-7

Attested  
CC \_\_\_\_\_  
md  
/



# PREMIER OPEN MRI & Diagnostic Center

Ref No: \_\_\_\_\_

Date: \_\_\_\_\_

Patient Name	Umar Khan
Age / Sex	25 Y / M
Date	7 AUGUST 2019

## PLAIN MRI CERVICAL SPINE

CLINICAL DATA: Trauma.

### EXAMINATION TECHNIQUE

Multi-planar imaging done through cervical spine acquiring T1/T2 weighted sagittal and axial sequences.

### FINDINGS

- Reversal is seen of cervical lordosis due to muscle spasm.
- Normal appearance of vertebral bodies and posterior elements is noted in the scanned area.
- Spinal cord appears normal with no evidence of any area of abnormal signal intensity in it. No evidence of any extra-dural / intra-dural mass.
- Inter-vertebral discs are normal with no protrusion or herniation. Nucleus pulposus and annulus fibrosis show normal signal intensity.
- Ligamenta flava and extra-dural fat are within normal limits.
- Neural foramina are normally visualized.
- No evidence of any extra- intra-dural or paravertebral mass seen.
- Pre-vertebral soft tissues are normal.

### CONCLUSION

Cervical kyphosis.  
Otherwise, unremarkable scan of the cervical spine.

Dr. Sadia Aziz Khan  
MBBS, FCPS (Radiology)  
Diplomat European Board of Radiology.



20

District Head Quarter, Teaching Hospital, Haripur  
Out Door Patients Department (O.P.D)

47

O.P.D No :- 76621

Rs:- 10

Name :- Umar Khan

Date & Time :- 08-Jan-2020 11:12:20

Gender :- Male Age :- 26 Years

District :- Haripur, KPK

Address :- Haripur

Patient I.D :- 12001077275

Patient Status :- Routine

BarCode :- \*120010772

Rs :- Ten Only

Rx:-

G/Solt

2/1/2

5 Myp Ce  
15.  
E 2

7 Caub  
v - 3 3 5

G. nms 2/2  
3 5 0

Attested  
M  
12

2

2

AP  
208

Enter By :- Molib Ur Rehman

OPD03



District Head Quarter, Teaching Hospital, Haripur  
Out Door Patients Department (O.P.D)

O.P.D No :- 78953

Rs:- 10

Name :- Umar Khan

Date & Time :- 10-Jan-2020 11:21:40

Gender :- Male Age :- 26 Years

District :- Haripur, KPK

Address :- Haripur

Patient I.D :- 12001079607

Patient Status :- Routine

BarCode :- \*120010796

Rs:- Ten Only

Rx:-

CDUT

40 Since Pan Rdumbae Regain for the  
last one week  
→ Bump structure of Pan for two or days  
→ Vomiting since morning

1/2 RSP 110/90 mmHg  
2/103°F

Rx 3 Novocet 1/2 / 3 voren 1/2  
- 3 D/WP 5 spadolix su @, 5 Meclaz @  
Sover

- Tab Novocet 500/1 + 1

- Tab Artifen 500/1 + 1

- Tab Bupropion 150/1 + 1

- 3 attention 2727 - 050036

Admission complete Rest For

Three (3) days from 10/01/2020 to 12/01/2020

Enter By :- Mohib Ur Rehman

Principal Medical Officer  
DHQ Teaching Hospital  
Haripur

Handwritten signature



EMERGENCY RS.10/-  
DHQ HOSPITAL HARIPUR  
OUT-PATIENTS DEPARTMENT

FACE VALUE RUPEES 10/-

NAME Uje  
YEARLY NO. 7317  
DATE 15-1-2020  
DISEASE \_\_\_\_\_

*N*

*to Med. Dept*

*10/80*

*7*

*L*

*Abhishek*

*me*  
*u*



District Head Quarter, Teaching Hospital, Haripur  
Out Door Patients Department (O.P.D)

3

O.P.D No :- 82121

Rs:- 10

Name :- Umar Khan

Date & Time :- 15-Jan-2020 09:38:41

Gender :- Male Age:- 26 Years

District :- Haripur, KPK

Address :- Haripur

Patient I.D :- 120010712775

Patient Status :- Routine

BarCode :- \*120010712

Rs :- Ten Only

Rx:-

Refer to Gastro OPD

IBS

- Cap. Lovemus 407  
Counselor 1-1-1

Ad

- Cap. Tab. Halifax 507  
Counselor 1-1-1

CB

- Hb 11  
- And New

- Cap. Makenol SR 207  
Counselor 1-1

Allested

ms/v



# Allama Iqbal Hospital

Pt's Name Imam

Age      Sex Male Wt      Date 28-1-2020

40°  
 Dyspersia  
 AMT Di  
 Nausea Insomnia  
 Fever  
 Bow G  
 Hypertension  
 BP 90/80 mmHg  
 Temp 41°

Rx

12/11 Nexomgong  
 (20) Maxolan  
 100mg  
 Rimgay 100mg  
 10/15

Cap: Norsteph 100mg  
 100mg  
 10/15  
 10/15  
 10/15

NOT VALID FOR COURT

Allama  
 M  
 K

Sent To:

OUT DOOR PATIENT TICKET

District HR CRP No: \_\_\_\_\_

Facility Name B-S. Khe

Name: Omair Khan Age: \_\_\_\_\_ Sex: \_\_\_\_\_

Father's/Husband's Name: \_\_\_\_\_

Dob. 31/1/2020

Monthly OPD Serial No. 1034

Provisional Diagnosis: \_\_\_\_\_

C  
E  
1/1/2020  
on Hand

BP  
120  
90

Clinical Findings / Investigations / Treatment / Referred/Test Findings

Ty. Dyclo 150  
M

1st visit  
1st visit

Dimerhydrochloride

Allsted

ms  
11



# Allama Iqbal Hospital

Pt's Name Umar

Age \_\_\_\_\_ Sex M. Wt \_\_\_\_\_ Date 17/02/2020

① Dyspepsia

Depression

On Examination

Bp. 120/80  
Pulse 80

Rx

⇒ Dig. Riset. Long-p Dig  
Marobon long in  
100ml Plader

Tab. AP 0.5mg  
0.5mg 0.5mg

Allama Iqbal Hospital

~~NOT VALID FOR COURT~~

# QAZI PSYCHIATRIC & E.E.G CLINIC

ABBOTTABAD

Dr. Qazi Rashid Hameed

MBBS, DPM, RMP

Dr. Osama Rashid Qazi

MBBS, RMP

PSYCHIATRIST

International Fellow

American Psychiatric Association (U.S.A)

Ex - MS Govt. Mental Hospital

Dhodial (Mansehra)

Ex - CHIEF PAKISTAN PSYCHIATRIC SOCIETY

KHYBER PAKHTOON KHWA CHAPTER

فون برائے رابطہ

0332-9183163

ایسٹ آباد

0992-412528



PMDC No: 2342-N

تح خان روڈ، منڈیاں، القابل  
شاگوشہ مانسہرہ، ڈوڈیٹ آباد

ڈاکٹر قاضی راشد حمید

ایم بی بی ایس۔ ڈی پی ایم۔ آرا ایم پی

مانسہرہ

دماغ اعصاب، نفسیات، مرگی، جنیٹات، ونگ نشیات  
سابقہ میڈیکل پرفیشنل کورسنگ، ہتال، احوالیال مانسہرہ

ڈاکٹر اسامہ راشد قاضی

ایم بی بی ایس، آرا ایم پی

NOT FOR LEGAL PURPOSE

72-149

آئندہ مشورہ کے لئے آنے سے ایک دن پہلے فون پر ضرور وقت لیں، بروز ہفتہ، اتوار کلینک بند رہتا ہے۔

19 MAR 2019

میرزا خان 5% گل زیب خان، بانڈی سیرجان

73-10  
19 MAR 2019

دوبارہ معائنہ کی تاریخ

19/3/19

## ضروری اہم بات

ادویات مریض اور بچوں کی پہنچ سے دور رکھیں۔  
رشتہ دار مریض کو دوا خود باقاعدگی سے کھلائیں۔  
مریض کے ساتھ ایسا رویہ رکھیں، جس سے اسے اپنائیت کا احساس ہو۔  
مریض کے ساتھ جذباتی لگاؤ کا مناسب حد تک اظہار کریں۔  
علاج کے ابتدائی دنوں میں ادویات کے کچھ ناپسندیدہ اثرات بھی ہو سکتے ہیں۔ ان سے گھبرائیے نہیں۔ یہ عارضی ہوتی ہیں دوا جاری رکھیں، یہ اثرات خود بخود ختم ہو جائیں گے۔  
آئندہ مشورہ کی تاریخ، بیماری کی نوعیت اور ادویات کے اثر پر منحصر ہوتی ہیں، جب بھی مشورہ کے لئے بلایا جائے ضرور تشریف لائیں۔  
یاد رکھیں کہ مریض کے لئے مفید اور ضروری ہے۔

ایمرجنسی کی صورت میں سید کی فری میڈیکل سٹور پر لے جائیں اس کو کہیں کہ ڈاکٹر صاحب سے فون پر رابطہ کے کے حالات لے لیں۔ 0333-5032795

Allah

# QAZI PSYCHIATRIC & E.E.G CLINIC

ABBOTTABAD

Dr. Qazi Rashid Hameed

MBBS. DPM. RMP

Fellow American Psychiatric Association (U.S.A)  
International Associate Royal College of Psychiatrists (UK)  
Ex-MS Govt. Mental Hospital Dhodial (Mansehra)  
Ex-Chief Pakistan Psychiatric Society KPK Chapter



Dr. Saleem Khan Marwat

MBBS. RMP. FCPS (cc)

Neuro Psychiatry Physician

PMDC No: 2342-N

فتح خان روڈ، منڈیاں بالقابل  
سٹاکاؤٹور مانسہرہ روڈ ایبٹ آباد

ڈاکٹر قاضی راشد حمید  
ایم بی بی ایس۔ ڈی پی ایم۔ آرا ایم پی  
ماہر (رہ) (ب)

دماغ اعصاب انقباض، مرگی، جنیٹات و ترک نشیات  
سائیکو سیکل پریزنٹیشن گورنمنٹ ہسپتال ایبٹ آباد

ڈاکٹر سلیم خان سروت  
ایم بی بی ایس۔ آرا ایم پی۔ ایف سی بی ایس (سی)

دماغ اعصاب انقباض، مرگی، جنیٹات و ترک نشیات  
ماہر (رہ) (ب)

NOT FOR LEGAL PURPOSE

فون برائے رابطہ  
0332-9183163  
ایبٹ آباد  
0992-412528

آئندہ مشورہ کے لئے آنے کے ایک دن پہلے فون پر ضرور وقت لیں، بروز ہفتہ، اتوار کلینک بند رہتا ہے۔

خان - بانڈی شیرخان (پری پور)      مہر خان      UHM-257

Dr. Rashid Hameed  
Asst. Director  
TMC - Quetta  
Executive Director  
- Porokh  
Admin. Officer  
- Quetta  
Dr. Saleem Khan Marwat  
Asst. Director  
TMC - Quetta  
Executive Director  
- Porokh  
Admin. Officer  
- Quetta

Cap. JUDGE  
6/3  
B. P. 110/100  
T.M.C. 4/3/100  
Qasim  
25  
Cap. JUDGE  
6/3  
B. P. 110/100  
T.M.C. 4/3/100  
Qasim  
25  
Cap. JUDGE  
6/3  
B. P. 110/100  
T.M.C. 4/3/100  
Qasim  
25

دوبارہ معائنہ کی تاریخ

### ضروری دلائل

ادویات مریض اور بچوں کی پہنچ سے دور رکھیں۔  
رشتہ دار مریض کو درود یا خود باقاعدگی سے کھلائیں۔  
مریض کے ساتھ ایذا دہانہ رویہ رکھیں جس سے اسے اپنائیت کا احساس ہو۔  
مریض کے ساتھ جذباتی لگاؤ کا مناسب حد تک اظہار کریں۔  
علاج کے ابتدائی دنوں میں ادویات کے پیکر ناپسندیدہ اثرات بھی ہو سکتے ہیں۔ ان سے گھبرائے نہیں۔ یہ عارضی ہوتی ہیں دوا جاری رکھیں، یہ اثرات خود بخود ختم ہو جائیں گے۔  
آئندہ مشورہ کی تاریخ، بیماری کی نوعیت اور ادویات کے اثر پر مبنی ہوتی ہیں، جب بھی مشورہ کے لئے باایا جائے ضرور تشریف لائیں۔  
یاد رکھیں کہ مریض کے لئے یہ مفید اور ضروری ہے۔

ایر جی کی صورت میں اس کی ترقی میڈیکل سٹور پر لے جائیں اس کو کہیں کہ ڈاکٹر صاحب سے فون پر رابطہ کر کے ہدایات لے لیں۔ 0333-6032795

Handwritten signature and initials.

# QAZI PSYCHIATRIC & E.E.G CLINIC

ABBOTTABAD

Dr. Qazi Rashid Hameed  
MBBS. DPM. RMP

Dr. Saleem Khan Marwat  
MBBS. (Pesh), FCPS (cc)



PMDC NO: 2343-N

تح خان روڈ، بالحقابل شاہ کوشور  
نمبر ۱۰ روڈ منڈیاں ایبٹ آباد

NOT FOR LEGAL PURPOSE

ڈاکٹر قاضی راشد حمید  
ماہر (ر) ایم بی بی ایس ڈی بی ایم آر ایم پی

دماغ اعصاب انجیاتی، مرکی، جنیاتی و رنگ اشیا۔  
سائیکو پیتھالوجی، کوشش، جنیاتی و ذہنی امراض

ڈاکٹر سلیم خان مروت  
ماہر (ر) ایم بی بی ایس (پش)

دماغ اعصاب انجیاتی، مرکی، جنیاتی و رنگ اشیا۔  
سائیکو پیتھالوجی، کوشش، جنیاتی و ذہنی امراض

PSYCHIATRIST  
Senior Medical Officer  
Dept of Psychiatry ATH

ٹیلی فون برائے رابطہ  
0332-9183163  
ایبٹ آباد  
0992-412528

آئندہ مشورہ کے لئے آنے سے ایک دن پہلے فون پر ضرور وقت لیں، بروز ہفتہ، اتوار کلینک بند رہتا ہے۔ 15 AUG 2019

معر فان ۹۰ مل زیب فان - بانڈی شیر خان

Irritability

S.I.A.A  
Anxiety etc.

Low Mood  
Traying Spells

Ref to  
Neurosurgeon  
for expert  
opinion

Tab Olepra 5mg

ایک ٹولرٹ

Tab Clomexet 25mg

ایک ٹولرٹ

Tab Cifrum 10mg (Este -D)

۱/۲ ٹولرٹ ماسے

Tab Maxigo

۱/۲ ٹولرٹ

25 yrs -

Police <sup>Single</sup>  
Dept  
Employee

MRI Brain  
E Kyphosis

Not going  
for work

دوبارہ معائنہ کی تاریخ  
15/8/19

**ضروری ہدایات**

ادویات مریض اور بچوں کی پہنچ سے دور رکھیں۔  
رشتہ دار مریض کو داخود یا قاعدگی سے کھائیں۔  
مریض کے ساتھ ایسا رویہ رکھیں، جس سے اسے اپنائیت کا احساس ہو۔  
مریض کے ساتھ جذباتی لگاؤ کا مناسب حد تک اظہار کریں۔  
علاج کے ابتدائی دنوں میں ادویات کے کچھ ناپسندیدہ اثرات بھی ہو سکتے ہیں۔ ان سے گھبرائیے نہیں۔ یہ عارضی ہوتی ہیں دوا جاری رکھیں، یہ اثرات خود بخود ختم ہو جائیں گے۔  
آئندہ مشورہ کی تاریخ، بیماری کی نوعیت اور ادویات کے اثر پر منحصر ہوتی ہیں، جب بھی مشورہ کے لئے پایا جائے تو ضرور تشریف لائیں۔  
مریض کو آپ کی بھرپور اور مستقل توجہ کی ضرورت ہے۔  
مریض سے نااطنے توڑیں، مریض کے ساتھ نفرت و غمے کا اظہار کبھی نہ کریں۔  
مریض پر کبھی بھی بے جا تنقید نہ کریں۔  
مریض کو روزمرہ کے امور میں شامل کرنے کی کوشش کریں۔  
یہ عارضی ہوتی ہیں دوا جاری رکھیں، یہ اثرات خود بخود ختم ہو جائیں گے۔  
یہ آپ کے مریض کے لئے مفید اور ضروری ہے۔

ایمرجنسی کی صورت میں کسی قریبی میڈیکل سٹور پر لے جائیں اس کو کہیں کہنا کہ اس صاحب سے فون پر رابطہ کر کے ہدایات لے لیں۔ 0333-5032795

Handwritten signature and initials.



# QAZI PSYCHIATRIC & E.E.G CLINIC

ABBOTTABAD

Dr. Qazi Rashid Hameed

MBBS, DPM, RMP

Fellow American Psychiatric Association (U.S.A)  
International Associate Royal College of Psychiatrists (UK)  
Ex-MS Govt. Mental Hospital Dhodai (Mansehra)  
Ex-Chief Pakistan Psychiatric Society KPK Chapter



Dr. Saleem Khan Marwat

MBBS, RMP, FCPS (cc)

Neuro Psychiatry Physician

PMDC No: 23424N

فتح خان روڈ، منڈیاں بالقبائل  
شاٹھوڑ نامہ روڈ ایبٹ آباد

ڈاکٹر قاضی راشد حمید

ایم بی بی ایس۔ ڈی پی ایم۔ آرا ایم پی  
ماہر (رہنمون)

دماغ اعصاب، انقباضات، مرگی، جنیبات و ترک نشیات  
ترابرد میڈیکل پریزنٹیشن گورنمنٹ ہسپتال ڈھوڑیاں نامہ

ڈاکٹر سلیم خان مروت  
ایم بی بی ایس۔ آرا ایم پی۔ ایف سی پی ایس (سی ای)  
ماہر (رہنمون) 1-13  
3-5  
7-14  
Born

دماغ اعصاب، انقباضات، مرگی، جنیبات و ترک نشیات

NOT FOR LEGAL PURPOSE

ٹیلی فون برائے رابطہ  
0332-9183163  
ایبٹ آباد  
0992-412528

آئندہ مشورہ کے لئے آگے سے ایک دن پہلے فون پر ضرور وقت لیں، بروز ہفتہ، اتوار کی تک بند رہتا ہے۔

مگر خان 5% گل زیب خان - ہانڈی شیرخان - پری پور UMN-25Y  
B.P. 120/80

*Handwritten medical notes and prescriptions:*  
 120/80  
 mood capsule  
 Ciprofloxacin  
 PEXENA  
 BUENISTA  
 Dexamethasone  
 ESOMRAE  
 KEMPRO  
 NEURAMIN  
 72 kg  
 120/80  
 10/25  
 35  
 3.2  
 11.5  
 5  
 25

**ضروری ہدایات**

دوبارہ جاننے کی تاریخ

30	10	30
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مریض کو آپ کی بھرپور اور مستقل توجہ کی ضرورت ہے۔  
 رشتہ دار مریض کو درود خود یا قاعدگی سے کھلائیں۔  
 مریض کے ساتھ ایسا رویہ رکھیں جس سے اسے اپنائیت کا احساس ہو۔  
 مریض کے ساتھ جذباتی لگاؤ کا مناسب حد تک اظہار کریں۔  
 علاج کے ابتدائی دنوں میں ادویات کے کچھ ناپسندیدہ اثرات بھی ہو سکتے ہیں۔ ان سے گھبرائیے نہیں۔ یہ عارضی ہوتی ہیں اور جاری رکھیں، یہ اثرات خود بخود ختم ہو جائیں گے۔  
 آئندہ مشورہ کی تاریخ، بیماری کی نوعیت اور ادویات کے اثر پر منحصر ہوتی ہیں، جب بھی مشورہ کے لئے بلایا جائے ضرور تشریف لائیں۔  
 یا آپ کے مریض کے لئے یہ ایسا اور ضروری ہے۔

ایمرجنسی کی صورت میں آٹھ سی قریبی میڈیکل ہسپتال پر لے جائیں اس کو کہیں کہ ڈاکٹر صاحب سے فون پر رابطہ کر کے ہدایات لے لیں۔ 0333-5032795

*Handwritten signature:*  
 Atleeda  
 10/14



# Allama Iqbal Hospital

Pt's Name UMAR KHAN  
 Age \_\_\_\_\_ Sex \_\_\_\_\_ Wt \_\_\_\_\_ Date 11/2/12

Rx

4  
Anxiety  
Depression

Plides  
a supple  
→

Escitalopram  
10mg  
twice daily

Divalproex 1500  
twice daily

Adv  
cur  
Psychiatrist

Suncid 800

212

NOT VALID FOR COURT

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ms  
12



# Allama Iqbal Hospital

Pt's Name Omar Khan  
Age 25y Sex ♂ Wt \_\_\_\_\_ Date 24/07/2020

Q/c:

Constipation

Dyspepsia

Anorexia

Anxiety/Depression

Insomnia

Rx

P.  
Cap: Nexum 40 — f  
عقار 100 ① — 1/2 2 1/2 1 ①

\* Symp: Domperidone ✓  
عقار 2 1/2 1/2 1/2 1/2 1/2 1/2 1/2 ②

• Tab: Fluoxetine  
عقار 50 ① — 1/2 1/2 1/2 1/2 ①

\* Symp: Mucaine ✓  
عقار 1 1/2 1/2 1/2 1/2 1/2 ①

\* Tab: Alp 0.5 — f ✓  
عقار 0.5 0.5 0.5 0.5 0.5 0.5 0.5 ①

In case of symptoms

NOT improved, kindly

consult a psychiatrist

*[Handwritten signature]*

Allotted  
*[Handwritten signature]*

NOT VALID FOR COURT



# Allama Iqbal Hospital

Pt's Name Omar Khan  
Age 27y Sex M Wt \_\_\_\_\_ Date 3/9/20

Rx

BP: 130/80

Anxiety  
- ↓ Sleep  
- Headache

- Ij. Penton + Gravimale in  
100ml  
pladex  
1/2 tablet  
- Ij. Novoteph 40mg 1/2 tablet

- Ij. Tres. Orisforte  
215F (1+2+2)  
1/2

Adm  
- Vit B12  
- vit - D levels.

Circular Road  
Near Fawara Masjid, Haripur  
Ph: 0995-527555

Attested  
By Mr  
u



# Allama Iqbal Hospital

Pt's Name Umair Khan  
Age 25 yr Sex Male Wt — Date 09/09/2020

P/c  
Insomnia  
Epigastric  
fullness  
Hx of Psychiatric  
illness

Rx  
10-12 days  
(previous hx of  
same  
complaints)

→ No previous hx  
of any  
chronic illnesses

Adv  
Pulse → 68 bpm  
Temp → 98°F  
R.P. → 110/70 mmHg

- ① Cap. Dextroprop. 6mg
- ① (15) - 1/2 tab, tid
- ② Tab. Dextroprop. 20mg
- ① (10) - 1+1
- ③ TRB Alp 0.5g
- ① (5) - 1/2 tab, tid

Circular Road,  
Near Fawara Masjid, Haripur  
Ph: 0995-927585

Allsted  
Ca ms  
kr



# Al-Syed Hospital (Pvt) Ltd.

## INVOICE

S. No 343

Date 15/09/2020

Admission No 12972  
 Room No R 204

Patient's Name Umer Khan  
 Specialist Name Z A R. H.

Date of Admission 10 09 2020

Duration of Stay 05 Days

Date of Discharge 15 09 2020

Admission Fee	500/-	
Surgeon Fee		
O.T Charges		
Anesthetist Fee		
Special Procedure Fee		
Pediatrician Fee		
Ultrasound		
M.O Charges		
ECG/X-Ray		
Laboratory		
Pharmacy		
Labour Room Charges		
Inpatient Consultancy	5000/-	Dr Z A R. H. (1000 x 5)
Room Rent	16000/-	2000 x 5
Heating Charges		
Electricity Charges		
Oxygen/Nebulization		
Laparoscopy Unit		
OTA/Staff E.C.F	4000/-	(1000 x 4)
<b>Total</b>	<b>19500/-</b>	
Advance		
Balance		

Phone: **0992-412648 / 0333-5042703**

Signature

Procedure Done \_\_\_\_\_

Date Of Surgery \_\_\_\_\_

Investigations Done \_\_\_\_\_

TREATMENT AT HOSPITAL

inje pLL 1000mg iv OD

inj Etosil ibs BD

inj Serenac / 308

inj valium / iv = 5.9 = 6

Cap Zom elan 12/10

Cap Ecodin 1mg 2/10

Tab Pantar 200 2/10

Tab diclofenac 12/10

Sup mee pils 10/10

ms 20/10

TREATMENT AT HOME

Cap DAVE 6/25 500

Cap Ecodin 4 100

Cap DABO 25 500

Cap NEELOXAM - 500

Cap XINIV 20 500

INJ SYCATIL 25/9

INJ ETOSIL 10/10

Cap PROLYC 100

Cap Omeprazole

Cap PANTAR 200 2/10

ms 20/10

Handwritten signature/initials on the left margin.



37 *Amir - B*

OFFICE OF THE  
SENIOR SUPERINTENDENT OF POLICE, FRP,  
HAZARA REGION, ABBOTTABAD.

Office #: 0992-9310036  
Fax#: 0992-9310478  
Email: spfrphazara@gmail.com

**ORDER**

This order will dispose off the departmental enquiry initiated against Constable Umar Khan No.4641/FRP, who absented himself from official duty with effect from 30-07-2019 to 03-09-2019 (35 days) without any leave/permission.

He was served with charge sheet and summary of allegations vide this office Enst; No. 1190/OHC/FRP, dated 22-08-2019 and in this regard inquiry was entrusted to Mr. Aftab Khan, Inspector FRP, Manselra. The Charge Sheet was received by the delinquent official on 29-08-2019 and after receiving the same, he submitted his reply on 03-09-2019 to the Enquiry Officer stating therein that he is patient of Neuro. After conducting Enquiry, Enquiry Officer found him guilty and recommended that absence period be treated as leave without pay. Upon the report of Enquiry Officer, the competent authority issued final show cause notice, vide this office Enst; No. 1518/OHC, FRP, dated 15-10-2019 which was again entrusted to aforementioned Enquiry Officer. The final show cause was received by brother of delinquent official on 29-10-2019, but bother to reply, nor attended the enquiry regardless of calling him by the Enquiry Officer time and again. Consequently, Enquiry Officer recommended him for major punishment.

Moreover, he again absented himself from official duty with effect from 06-09-2019 to 24-12-2019 (109 days). He appeared and submitted application before Worthy Deputy Commandant FRP, Peshawar by stating that he is ill. After his appearance, this office was directed by the Office of Deputy Commandant to get medically examine the delinquent official from Medical Board. In this regard this office approach Medical Board, BBS, Teaching Hospital, Abbottabad, vide this this office Memo; No.1084/OHC, dated 29-07-2019, after the correspondence BBS, Teaching Hospital Abbottabad vide Memo; No. 5397/Estab; dated 29-08-2019 received having remarks "He is physically and mentally fit to continue his jobs".

Furthermore, he again absented himself from official duty with effect from 29-01-2020 to till date.

In view of above and in the light of enquiry report, the undersigned concluded that delinquent official was given several times opportunities to continue his job but he did not taken keen interest to continue his job.

I Abdul Aziz Afridi, being competent authority award him major punishment of Removal From Service under Police Rules 1975 with immediate effect and absence period i.e. 172 days is to be treated as without pay.

*Abdul Aziz Afridi*  
*MA*

*MA*  
(ABDUL AZIZ AFRIDI)  
Senior Superintendent of Police, FRP,  
Hazara Region, Abbottabad.

No. 415-20

/OHC/FRP, dated, Abbottabad the, 26/02/2020.

Copy of above is forwarded for favour of information and necessary action

to the:-

1. Commandant, FRP, Khyber Pakhtunkhwa Peshawar please.
2. SRC/Accountant/Inspector Haripur & RI, FRP, Lines Hazara Region Abbottabad.

Copy of above is forwarded to Sub-Inspector Khan r/o Bandi Sher Khan, Haripur.



گزارش ہے کہ سائل فورم 05/2013 کو حکم دستبرد پولیس سیری لوہر میں ہوئی

ہوا۔ سائل کو فورم 04/2017 کو دل کی تکلیف ہوئی، جو کہ سائل پہلے ذرا لوہر

سیری لوہر ڈاکٹر اور بعد میں پیرا ڈاکٹر سے انعام حاصل کرنا تھا۔ سائل کی

ٹرانسفر فورم 01/2019 کو F.R.P پولیس سیراہ رینج میں کر دی گئی، جہاں

پر سائل ڈیوٹی جوائن کرنا سا ساٹھ ساٹھ ایسا علاج و معالجہ ہی جا رہا تھا۔

سائل شاہ مقصود کوئی میں ایسے مسائل بھی سرانجام دے رہا تھا کہ سائل کی

ٹرانسفر فورم 07/2019 کو ضلع لوہر کو مینا کر دی گئی۔ جہاں پر سائل

فورم 07/2019 کو ضلع لوہر کو مینا، پولیس اسٹیشن میں کامیابی، باج دیں ڈیوٹی

سرانجام دینے کے بعد سائل D-S-P ضلع لوہر کو مینا سے 7 دن کی مرخصی

الفاظی ملی۔ مرخصی الفاظ لینے کا مقصد صرف اور صرف بوجہ بیماری اپنی ٹرانسفر

ضلع سیری لوہر کروانی تھی۔ کیونکہ سائل کو ضلع لوہر کو مینا میں بہت زیادہ

مشکل نا کا سامنا تھا۔ مرخصی الفاظ آنا کے بعد سائل اگلے دن D-S-P صاحب

FRP سیراہ رینج مہراں صاحب جو کہ اس وقت قائم مقام F.R.P/S-P

سیراہ رینج کے مسائل بھی سرانجام دے رہے تھے ان پر بوجہ بیماری سلسلہ

ٹرانسفر پیش ہوا۔ لیکن D.S.P صاحب نے سائل کی ٹرانسفر نہ کی۔ سائل

اولے دن ڈائریکٹ صاحب FRP پولیس K.P.K پر پیش ہوا۔ حقوں

FRP آفس ایسٹ آباد کو ایک منڈیوں لوہر ڈیپوٹ کا لیسٹر لکھا۔ ڈیوٹیوں

لوہر ڈیپوٹ پر ان کا جواب آنا کا جو وقت تھا وہ کم سے کم دو ماہ کا تھا۔ اور

Amir  
ca

اور وہ دو تھیں سائل، امصر صاحب FRP/0-11-C لوئیس لیزا ریح  
کا کہنے پر گھبریں گسراہے۔ اسل دوواہ کے عسر ۲۲ کا دفران سائل کی تھواہ  
لوصہ عسر حاضر ہی سوکر دی گئی۔ جب عذر ایل لوہڈ کا جواب آتا تو اٹھوای سائل کی  
عسر ایل اور عذر ایل فکل طور پر مٹ قرار دیا۔

عناں وال۔  
اگر سائل فکل طور پر مٹا تو سائل ڈاکٹر سے ایسا علاج و معالجہ کس نامت کار کو دیا  
تھا۔ عذر ایل لوہڈ کا جواب آتا ہے کہ بعد عسر ۲۲ کے سائل کو الفاضی عسر ہی ہے اس لئے  
سائل مسلسل ۱۱ ماہ ڈلوئی سے عسر حاضر رہا۔ اگر کہ سائل کو لوصہ ہماری ماضی دیا  
مشکل کا سامنا تھا۔

ص ۲۷ S.P صاحب FRP لوئیس لیزا ریح نصیحت یوں۔ تو ان کو عسر حاضر ہی  
کا علم ہوا تو انھوں نے عسر ایس میں نزل دیا۔ عسر سے بعد عسر پر آکر ہی S.P  
صاحب نے عسر پر اس عسر پر لور کر دی۔ سائل کی S.P صاحب سے تھواہ سائل کا  
حوالے سے کوئی باتا جیت ہیں۔ لوئی۔ فورم ۱۲/۲۶ کو دیا۔ سائل FRP

لوئیس لیزا ریح میں حاضر ہی کی۔ ۱۰/۹ کو سائل کی طبیعت بہت دیاہہ جراب بھی اور  
سائل دہر لہہ پر اٹھوای ڈاکٹر ایسا علاج و معالجہ کو کر رہا تھا۔ اس دوران ڈلوئی پر آ  
جنا کے اعترافات اور علاج معالجہ کے اعترافات سائل نے فرس لئے۔ کو کہ سائل کی  
تھواہ بندھی۔ طبیعت کا جراب ہوا اور بیسے نہ ہوا کی وجہ سے سائل فورم ۱۰/۲۹

کو دیا۔ ڈلوئی سے عسر حاضر ہوا۔ لیکن سائل نے دہر لہہ ہون کے علاج ایسے اسیران یا  
کو ضرور دیا تھی کہ سائل کی طبیعت بہت دیاہہ جراب ہے۔ اور سائل ڈلوئی پر  
سین آسکنا۔ فورم ۱۱/۵۲ کو سائل S.P صاحب FRP لیزا ریح پر

سلسلہ بندش تھواہ ہیں ہوا۔ جہاں پر سائل کو پیشگی کی اجازت ہیں  
دی گئی۔ سائل پاس بیسے نہ ہوا اور ہماری کی وجہ سے وائس گھر آتا

Attested  
[Signature]

سائل کو فوراً 26.02.2020 کو F.R.P / S-P ایئر لائن سے برطانیہ سے امریکہ کے لیے روانہ کیا جائے۔

اسی بیماری کو مدنظر رکھتے ہوئے سائل کو لگاتار کے سائل کے ساتھ ٹالہ بھی برقی اور  
درخواست کے مطابق ہوا کے ذریعہ امریکہ کے لیے روانہ کیا جائے گا۔  
فراہم کیلئے سائل کے اعداد کو مدنظر رکھتے ہوئے اور پوری کوئی بھی سائل کے  
کو مدنظر رکھتے ہوئے سائل کے برطانیہ سے امریکہ کے لیے برطانیہ کی جانب سے امریکہ کے  
ساتھ ٹالہ بھی برقی ہوگی۔ سائل کو دوبارہ ڈیوٹی فری وال کیا جائے۔  
اور لگاتار سائل کے ساتھ کسی قسم کی کوئی ٹالہ بھی برقی ہوگی۔ سائل کو دوبارہ ڈیوٹی  
فری وال نہ کیا جائے۔ سائل کے برطانیہ سے امریکہ کی جانب سے امریکہ کے  
ایئر لائن سے امریکہ کے لیے سائل کے برطانیہ سے امریکہ کے لیے سائل کے  
ساتھ ٹالہ بھی برقی ہوگی۔ سائل کے اعداد کو مدنظر رکھتے ہوئے سائل کے  
ساتھ ٹالہ بھی برقی ہوگی۔

سائل تاحیات آپ کے بچے دعا گو رہے گا۔ شکریہ۔

مفسر خان ولد قاریب خان ۱/۵ بگڑہ تحصیل ضلع راولپنڈی  
0335-0053546

Attested  
[Signature]

ORDER

This order will dispose of the departmental appeal preferred by ex-constable Umar Khan No. 4641 of FRP Hazara Range, against the order of SP FRP Hazara Range, Abbottabad issued vide Order Endst; No. 415-20/OHC, dated 26.02.2020, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he absented himself from lawful duty with effect from 30.07.2019 to 03.09.2019 for total period of **35 days**, without any leave or prior permission of the competent authority.

In this regard, he was issued Charge Sheet alongwith Summary of Allegations vide office Endst; No. 1190/OHC/FRP, dated 22.08.2019 and Inspector Aftab Khan FRP Mansehra, was nominated as Enquiry Officer to unearth the actual facts. The delinquent constable submitted his reply of Charge Sheet on 03.09.2019 wherein he has taken the plea of his illness. After completion of all codal formalities, the Enquiry Officer submitted his findings wherein the accused constable was found guilty of the charges leveled against him and recommended that his absence period be treated as leave without pay.

Upon the recommendation of Enquiry Officer he was issued Final Show Cause Notice vide office Endst; No. 1518/OHC/FRP, dated 15.10.2019, which was served upon his brother on 29.10.2019, but he neither submit his reply nor attended the enquiry proceedings despite the fact he was called time and again by Enquiry Officer. Finally the Enquiry Officer recommended him for major punishment.

Moreover, during the course of enquiry the accused constable again absented himself from lawful duty with effect from 06.09.2019 to 24.12.2019 for total period of **109 days**. He appeared and submitted application before Deputy Commandant FRP, KP, Peshawar by stating that he is ill. After his appearance, he was directed for getting medical examine from Medical Board. In this regard, Medical Board, BBS, Teaching Hospital, Abbottabad was approached vide office Memo No. 1084/OHC, dated 29.07.2019. After examined BBS, Teaching Hospital, Abbottabad vide his Memo No. 5397/Estab; dated 29.08.2019 has reported that "**He is physically and mentally fit to continue his job**".

Furthermore, he again absented himself from official duty with effect from 29.01.2020 till the date of removal from service i.e 26.02.2020 for total period of **27 days** without any leave or prior permission of the competent authority.

Keeping in view the above narrated facts and other material available on record, the delinquent official was given several times opportunities to continue his job, but he did not taken keen interest to continue his job, therefore, the competent authority awarded him major punishment removal from service vide Order Endst; No. 415-20/OHC/FRP, dated 26.02.2020.

Feeling aggrieved against the impugned order of SP FRP Hazara Range, Abbottabad, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 08.10.2020.

During the course of personal hearing, the applicant failed to present any justification regarding his prolong absence. From perusal of enquiry file it has been found that the allegations were fully established against him during the course of enquiry. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force. Therefore any leniency or complacency would further embolden the accused officer and impinge upon the adversely on the over all discipline and conduct of the force. It is settled proposition of law that law helps the diligent and not indolent. Thus there doesn't seems any infirmity in the order passed by the competent authority, therefore no grounds exist to interfere in same.

Based on the findings narrated above, I, **Malik Muhammad Tariq PSP**, Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected/dismissed being time barred and meritless.

Order Announced.

*Attested*  
Ca *mb*  
12

*[Signature]*  
Deputy Commandant  
For Commandant FRP  
Khyber Pakhtunkhwa, Peshawar.

No 9457-58 ISI Legal, dated Peshawar the 14/10/2020.

Copy of above is forwarded for information and necessary action to the:-

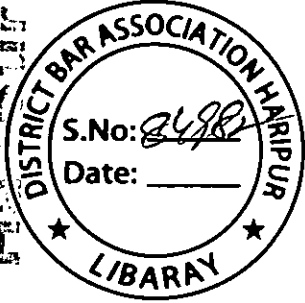


DBA.No: \_\_\_\_\_ 201  
 BC No: \_\_\_\_\_  
 Name of Advocate: محمد اسلم تنویری

S.No: 84982

# وکالت نامہ

ڈی۔ پی۔ اے



بعدالت: \_\_\_\_\_  
 عنوان: \_\_\_\_\_  
 منجانب: \_\_\_\_\_  
 نام: \_\_\_\_\_  
 نوعیت مقدمہ: \_\_\_\_\_  
 باعث تحریر آنکہ: \_\_\_\_\_

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصدیقہ مقدمہ بمقام \_\_\_\_\_ کے لیے  
 محمد اسلم تنویری

کو حسب ذیل شرائط پروکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو بروعدالت حاضر ہوتا رہوں گا اور بروقت  
 پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری  
 غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب  
 موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ  
 ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے  
 پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار نہ ہوں گے اور کسی معاوضہ کے ادا کرنے یا بختانہ کے واپس کرنے کے بھی صاحب  
 موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر ذاختہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو  
 عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی  
 اختیار ہوگا اور اور کسی حکم یا ڈگری کرانے اور سر قسم کاروبہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور  
 اس کے ثالثی و راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیر و نجات از پکھری صدر  
 اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب  
 موصوف کو بشرط ادائیگی علیحدہ محتانہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ  
 مذکور یا اس کے کسی جزوی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو  
 بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ  
 التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل 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 قسم کا صاحب موصوف کے  
 برخلاف نہیں ہوگا۔

لہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ مورخہ: 13 دن 11 ماہ 2020 سال

Accepted by  
 M. Aslam

محمد اسلم تنویری

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 14224/2020.**

**Umar Khan Son of Gulzeb Khan (constable No. 4641 FRP KPK) Mohallah Dalian,  
P.O Bagra, Village Bandi Sher Khan, Tehsil & District  
Abbotabad.....Appellant.**

**VERSUS**

**Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar &  
others.....Respondents**

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES
1.	Para-wise Comments		04
2.	Letter to Standing Medical Board; at BBS, Teaching Hospital, Abbottabad for medical checkup.	Annexure "A"	01
3.	Medical Report	Annexure "B"	01
4.	Affidavit		01
5.	Index		01
<b>Total</b>			<b>08</b>

  
**RESPONDENTS**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 14224/2020.**

**Umar Khan Son of Gulzeb Khan (constable No. 4641 FRP KPK) Mohallah Dalian,  
P.O Bagra, Village Bandi Sher Khan, Tehsil & District  
Abbotabad.....Appellant.**

**VERSUS**

**Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar &  
others.....Respondents**

**PARAWISE REPLY BY RESPONDENTS.**

**RESPECTFULLY SHEWETH:**

**PRELIMINARY OBJECTIONS**

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has no cause of action to file the instant appeal.
4. That the appellant has not come to this Honorable Tribunal with clean hands.
5. That the appellant is estopped due to his own conduct to file the instant Service Appeal.
6. That the appellant is trying to conceal the material facts from this Honorable Tribunal.

**FACTS:-**

1. Incorrect. The appellant was enlisted as constable in Police Department as admitted. However, subsequently the appellant remained absent from duty, for a long period without any leave or prior permission of the competent authority.
2. Incorrect. The appellant remained absent from duty with effect from 30.07.2019 to 03.09.2019 for period of **33 days** and again with effect from 06.09.2019 to 24.12.2019 and 29.01.2020 till the date of removal from service i.e 26.02.2020 for period of **134 days**, thus he remained absent from lawful duty for total period of **167 days**, without any leave or prior permission of the competent authority. Regarding his illness, he was referred for medical checkup before Standing Medical Board, at BBS, Teaching Hospital, Abbottabad vide office Memo No. 1084/OHC/FRP, dated 29.07.2019. After examination by BBS, Teaching Hospital, Abbottabad vide his Memo No. 5397/Estab, dated 29.08.2019 has reported that **"He is physically and mentally fit to continue his job"**. (Copy of the office memo and medical superintendent BBS, Teaching Hospital, Abbottabad are attached as annexure "A & B").
3. Incorrect. As explained in the preceding Para No. 02 above, the appellant was remained absent from lawful duty for a long period, without any leave or prior permission of the competent authority, therefore, he was dealt with proper

enquiry and his salary was stopped for the purpose of enquiry proceedings. After fulfillment of all codal formalities he was dismissed from service as per law / rules. Moreover, the appellant was already declared fit for duty by the Medical Board, BBS, Teaching Hospital, Abbottabad accordingly.

4. Incorrect. On the allegations of willful absence, the appellant was issued Charge Sheet with Summary of Allegations vide office Endst; No. 1190/OHC/FRP, dated 22.08.2019 and Inspector Aftab Khan FRP Mansehra, was nominated as Enquiry Officer to unearth the actual facts. The appellant was submitted his reply of Charge Sheet on 03.09.2019, which was not found satisfactory by the Enquiry Officer. After completion of all codal formalities, the Enquiry Officer submitted his findings, wherein the appellant was found guilty of the charges leveled against him and recommended that his absence period be treated as leave without pay. Upon the findings of Enquiry Officer he was issued Final Show Cause Notice vide office Endst; No. 1518/OHC/FRP, dated 15.10.2019, which was served upon his brother on 29.10.2019, through special messenger on his home address and the enquiry was again entrusted to the Enquiry Officer, but the appellant was deliberately failed to submit his reply or appeared before the Enquiry Officer despite the fact that he was called time and again by Enquiry Officer. Finally the Enquiry Officer recommended him for major punishment. Moreover, the appellant did not approach for obtaining copy of finding report. Furthermore, a sufficient opportunity for personal hearing in the light of natural justice was provided to the appellant, by the competent authority, but he failed to avail this opportunity.
5. Departmental appeal submitted by the appellant was thoroughly examined and rejected with cogent grounds.
6. Incorrect and denied. Departmental appeal of the appellant was entertained and rejected on the ground of time barred and meritless as well. Moreover, the Deputy Commandant Frontier Reserve Police Khyber Pakhtunkhwa, Peshawar is a competent authority in the case of appellant as the power of all kinds of disciplinary action at Departmental Appeals / Review Petitions / Mercy petitions has already been delegated to the Deputy Commandant Frontier Reserve Police Peshawar, by the competent authority vide office order No. 341-45/PA, dated 13.03.2019.

**GROUND:-**

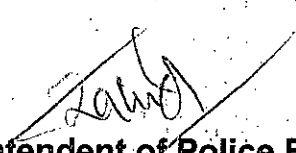
- a. Incorrect. The orders passed by the respondents in the case of appellant are legally justified and in accordance with law / rules as the same were passed after fulfillment of all codal formalities required as per law / rules.

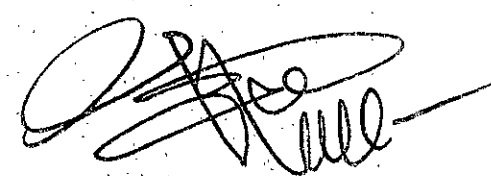



- b. Incorrect. As admitted by the appellant that he was transferred to FRP Hazara Range, thus under the circumstances the respondent No. 4 i.e SP FRP Hazara Range, Abbottabad is a competent authority to proceed the appellant against departmentally as well as to award punishment as the appellant was serving in FRP Hazara Range. Thus the dismissal order and subsequent rejection order of the appellant are legally justified and in accordance with law rules.
- c. Incorrect. The appellant was treated in accordance with law/rules by giving him sufficient and proper opportunities at every level of defense and that the entire proceedings were carried out in accordance with existing / special law i.e Police Rules 1975 amended in the year 2014. Thus the orders passed by the respondents are legally justified and in accordance with law and rules.
- d. The allegations are false and baseless. As the appellant was treated in accordance with law /rules within the meaning of Article 4 of the Constitution by giving him sufficient and proper opportunities at every level of defense and that the entire proceedings were carried out in accordance with Police Rules 1975 amended in the year 2014.
- e. Incorrect. As in departmental appeal, the appellant has taken the plea of his illness, but he was already declared as fit for duty by the Medical Board, BBS, Teaching Hospital, Abbottabad accordingly. The appellant was treated in accordance with law/rules by the respondents as proper departmental proceedings were initiated against the appellant, he was Charge Sheeted and Enquiry Officer was nominated, he was summoned time and again, but he did not appear before the Enquiry Officer or before the competent authority.
- f. Incorrect. The appellant remained absent from his lawful duty without any leave or prior permission of the competent authority. He was dealt departmentally and the allegations leveled against the appellant were fully established during the course of enquiry, otherwise the respondents have no any grudges with the appellant. After fulfillment of all codal formalities, appellant was awarded major punishment under the law/rules.
- g. Incorrect. The appellant deliberately remained absent from his lawful duty without any leave or prior permission of the competent authority. Furthermore, he was declared as fit for duty by the Medical Board, BBS, Teaching Hospital, Abbottabad. Thus neither the appellant deserved for reinstatement in service and nor for the grant of medical leave.
- h. Incorrect. The appeal is badly barred by law & limitation.

**PRAYERS:-**

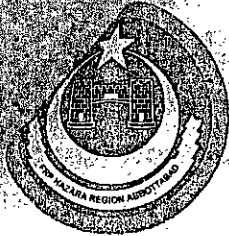
Keeping in view the above facts and circumstances, it is most humbly prayed that the instant service appeal being not maintainable may kindly be dismissed with costs please.

  
**Superintendent of Police FRP,**  
Hazara Range Abbottabad  
(Respondent No. 04)

  
**Deputy Commandant FRP,**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 03)

  
**Commandant FRP,**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 02)

  
**Provincial Police Officer,**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 01)



OFFICE OF THE  
SUPERINTENDENT OF POLICE, FRP,  
HAZARA REGION, ABBOTTABAD.

Office #: 0992-9310036

Fax#: 0992-9310478

Email: spfrphazara@gmail.com

No. 1084 /OHC/FRP, dated Abbottabad the 29/07 /2019.

To,  
The Medical Superintendent,  
BBS, Teaching Hospital,  
Abbottabad.

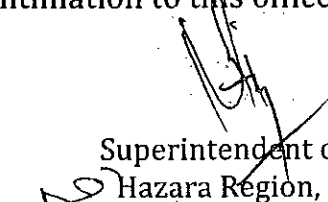
Subject: STANDING MEDICAL BOARD OPINION.

Memo:

It is submitted that an application submitted by Constable Uma Khan No.4641 of this unit appeared before the worthy Commandant, FRP, Khyber Pakhtunkhwa Peshawar, that his Platoon No.100 has been transferred to Lower Kohistan and he is seriously ill, therefore he requested for transfer to other Platoon posted in his home District for the purpose of treatment.

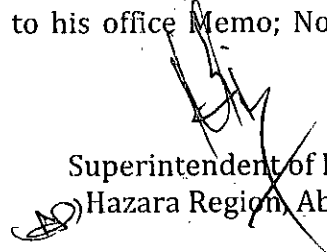
It is submitted that the competent authority has forwarded the case with the remarks that "Got his medically examined from Standing Medical Board and decided his posting in the light of its findings". (Copy enclosed for ready reference)

It is therefore requested that kindly call the applicant along with his medical documents to clarify the same under intimation to this office please.

  
Superintendent of Police, FRP,  
Hazara Region, Abbottabad.

No. 1085 /OHC/FRP,

Copy of above is submitted to the Commandant, FRP, Khyber Pakhtunkhwa Peshawar for favour of information w/r to his office Memo; No.6478/SI Legal dated 25-07-2019.

  
Superintendent of Police, FRP,  
Hazara Region, Abbottabad.

OFFICE OF THE MEDICAL SUPERINTENDENT  
BBS TEACHING HOSPITAL ABBOTABAD.  
No. 5397 Estab: dated 29 / 8 /2019.

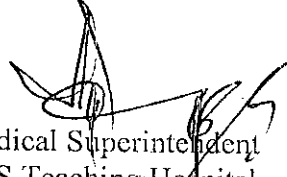
To  
The Senior Superintendent of Police  
FRP Hazara Region  
Abbottabad.

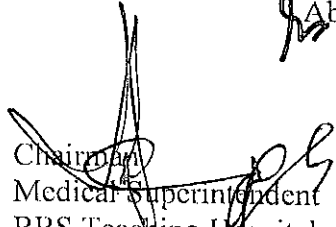
Subject STANDING MEDICAL BOARD


Memo:-


Reference this office letter No.5035 dated 05-08-2019.

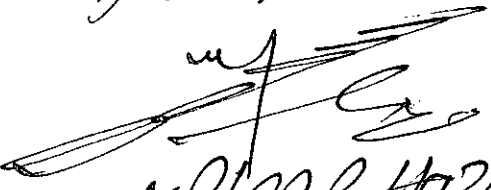
We have carefully examined Mr.Umar Khan Constable No. 4661 attached to your department on 07-08-2019. He is physically and mentally fit to continue his job in Kohistan.

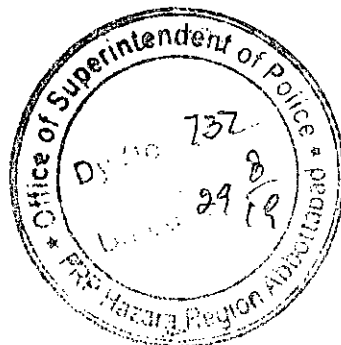
  
Medical Superintendent  
BBS Teaching Hospital  
Abbottabad.  
Medical Superintendent  
B.B.S Teaching Hospital  
Abbottabad

  
Chairman  
Medical Superintendent  
BBS Teaching Hospital  
Abbottabad.  
Medical Superintendent  
B.B.S Teaching Hospital  
Abbottabad

  
Member  
District Physician  
B.B.S Teaching Hospital  
District Physician Abbottabad  
BBS Teaching Hospital  
Abbottabad.

  
Member  
District Surgeon  
BBS Teaching Hospital  
Abbottabad.

*OK*  
*Fur Maqsood*  
  
*SSP/FRP Hazara*  
*29/8/2019*



**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

Appeal No.14224/2020.

Umar Khan S/O Gulzeb Khan (Constable No.4641 FRP, KPK) Mohallah Dalian, PO  
Bagra, Village Bandi Sher Khan, Tehsil & District Abbottabad.

..... (Petitioner)

**VERSUS**

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. Commandant, FRP, KPK, Peshawar.
3. Deputy Commandant, FRP, KPK, Peshawar.
4. Superintendent of Police, FRP, Hazara Region Abbottabad.

..... (Respondent)

**AFFIDAVIT**

I DSP, Azam Ali Shah, FRP, Hazara Region, do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments on behalf of Respondents No.01 & 04 is correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court.

**DEPONENT**

*Azam Ali Shah*

CNIC No.13101-3018330-1

Identify By

*Zahid*  
Superintendent of Police, FRP,  
Hazara Region Abbottabad.  
(Respondent No.04)

*Az*  
Commandant, FRP,  
Khyber Pakhtunkhwa, Peshawar.  
(Respondent No.02)

*azgh*  
Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.  
(Respondent No.01)

*Deputy*  
Deputy Commandant, FRP,  
Khyber Pakhtunkhwa, Peshawar.  
(Respondent No.03)

**TESTE**



**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

Appeal No.14224/2020.

Umar Khan S/O Gulzeb Khan (Constable No.4641 FRP, KPK) Mohallah Dalian, PO  
Bagra, Village Bandi Sher Khan, Tehsil & District Abbottabad.

..... (Petitioner)

**VERSUS**

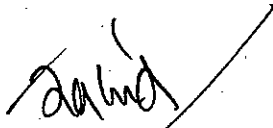
1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. Commandant, FRP, KPK, Peshawar.
3. Deputy Commandant, FRP, KPK, Peshawar.
4. Superintendent of Police, FRP, Hazara Region Abbottabad.

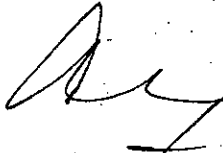
..... (Respondent)


**AUTHORITY LETTER**

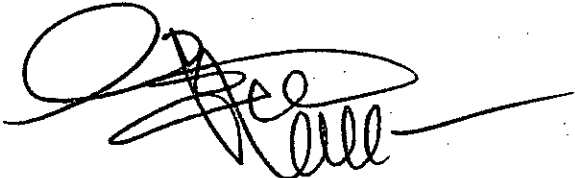
Respectfully Sheweth: -

We respondents No.01 to 04, do hereby solemnly authorize  
Azam Ali Shah, DSP, FRP, Hazara Range to attend the Honorable Court and  
submit affidavit/comments required for the defense of above service appeal on our  
behalf.

  
**Superintendent of Police, FRP,  
Hazara Region Abbottabad.**  
(Respondent No.04)

  
**Commandant, FRP,  
Khyber Pakhtunkhwa, Peshawar.**  
(Respondent No.02)

  
**Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.**  
(Respondent No.01)

  
**Deputy Commandant, FRP,  
Khyber Pakhtunkhwa, Peshawar.**  
(Respondent No.03)

✓

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

Service Appeal No.14224/2020

Date of Institution ... 13.11.2020  
Date of Decision ... 19.09.2022

Umar Khan S/O Gulzeb Khan (Constable No.4641 FRP KPK)  
Mohallah Dalian, PO Bagra, Village Bandi Sher Khan, Tehsil &  
District Abbottabad.

... (Appellant)

**VERSUS**

Provincial Police Officer Khyber Pakhtunkhwa, Peshawar and  
three others.

... (Respondents)

Muhammad Aslam Tanoli, ... For appellant  
Advocate

Kabir Ullah Khattak, ... For respondents.  
Additional Advocate General

Rozina Rehman ... Member (J)  
Fareeha Paul ... Member (E)

**JUDGMENT**

**ROZINA REHMAN, MEMBER (J):** The appellant has invoked the  
jurisdiction of this Tribunal through above titled appeal with the prayer  
as copied below:

“On acceptance of instant service appeal order  
dated 26.02.2020 and 14.10.2020 of respondents may  
graciously be set aside and the appellant be  
reinstated in his service from the date of dismissal  
with grant of consequential service back benefits.”

2. The relevant facts leading to filing of instant appeal are that appellant was inducted in District Police, Haripur as a Constable on 30.05.2013. He suffered from cardiac disease in the year 2017 and ~~he~~ started his regular medical treatment. He was transferred to District Lower Kohistan on 15.07.2019, <sup>and</sup> ~~he~~ therefore, applied for 07 days casual leave in order to get medical treatment and to try his luck for his transfer to Abbottabad or Haripur. He appeared before the then SP FRP Hazara Range, Abbottabad but his request was not considered. On the following day, he appeared before the Commandant FRP Khyber Pakhtunkhwa and accordingly he was directed to appear before the Medical Board for medical checkup. It took two months and he was allowed by the Officer Incharge Police Lines to remain at his home. On appearing before the Medical Board, he was declared physically fit for joining duty. He continued his medical treatment but his salary was stopped and after some time, he was transferred from Kohistan to District Haripur. He joined his duties at District Haripur on 26.12.2019. He once again fell ill on 29.01.2020, therefore, he informed his officers with the request for leave and release of salary and lastly he received a letter of dismissal from service on 26.02.2020. Feeling aggrieved, he filed departmental appeal which was rejected, hence, the present service appeal.

3. The respondents were summoned and they attended the Tribunal. Several opportunities were given for submission of comments but to no avail and vide order sheet dated 21.12.2021 their right for submission of reply was struck off.



4. We have heard appellant and Muhammad Aslam Tanoli Advocate learned counsel for appellant and Kabir Ullah Khattak, Additional Advocate General for the respondents and have gone through the record and the proceedings of the case in minute particulars.

5. Muhammad Aslam Tanoli Advocate, learned counsel appearing on behalf of appellant contended with vehemence that impugned orders dated 26.02.2020 and 14.10.2020 <sup>were</sup> ~~are~~ illegal, against law and facts, hence, <sup>were</sup> ~~are~~ liable to be set aside. He contended that the impugned orders were passed without fulfilling the codal formalities as he was not treated in accordance with law and rules on the subject and they acted in violation of Article-4 of the Constitution of Islamic Republic of Pakistan, 1973. It was further submitted that the absence of the appellant was not intentional and deliberate rather due to his illness and circumstances beyond his control, hence, he <sup>might</sup> ~~may~~ kindly be reinstated in service with all back benefits.

6. Conversely learned AAG submitted that the appellant remained absent from duty for a long period without any leave or prior permission of the competent authority. He remained absent from duty w.e.f 30.07.2019 to 03.09.2019 for 33 days, from 06.09.2019 to 24.12.2019 and 29.01.2020 till the date of removal from service i.e. 26.02.2020 for a period of 134 days, thus remained absent from lawful duty for total period of 167 days. Regarding his illness, he was referred to medical checkup before Standing Medical Board at BBS Teaching Hospital, Abbottabad dated 29.07.2019 and after examination by Standing Medical Board, it was reported that appellant

<sup>was</sup> is physically and mentally fit to continue his job. Lastly, he submitted that on the allegation of willful absence, he was issued charge sheet with statement of allegations and Inspector Aftab Khan was nominated as Inquiry Officer to unearth the hidden facts, where-after, final show cause notice was issued which was served upon his brother through special messenger and again inquiry was entrusted to the Inquiry Officer but he deliberately failed to submit his reply and accordingly he was awarded major punishment of removal from service vide order dated 26.02.2020.

7. 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 departmental inquiry was initiated against appellant for his willful absence. He was served with charge sheet and summary of allegations and one Aftab Khan Inspector FRP Manshera was appointed as Inquiry Officer. He submitted his reply to the Inquiry Officer wherein he stated to be a patient of Neuro. The Inquiry Officer found him guilty and recommended that absence period be treated as leave without pay. Upon the report of Inquiry Officer final show cause notice was issued which was received by his brother on 29.10.2019 but he failed to attend the inquiry proceedings. He once again absented himself from official duty from 06.09.2019 to 24.12.2019 (109 days) and he submitted application before Deputy Commandant FRP Peshawar by stating that he is chronic patient. After his appearance, the Senior Superintendent of Police FRP was directed by the office of Deputy Commandant to get medically examined the

appellant through Medical Board. Learned AAG submitted letter No.1084 dated 29.07.2019 of Superintendent of Police FRP addressed to the Medical Superintendent BBS, Teaching Hospital Abbottabad for the constitution of Standing Medical Board. The opinion of the Standing Medical Board was also produced bearing No.5397 dated 29.08.2019 vide which appellant was declared physically and mentally fit to continue his job in Kohistan. From the contents of appeal it is evident that the appellant after reporting his arrival in District Kohistan, ~~he~~ remained absent w.e.f 30.07.2019 till the date of his removal from service. Accordingly, he was awarded major punishment of removal from service vide order dated 26.02.2020. He preferred departmental appeal which is available on file and is undated. His departmental appeal was decided on 14.10.2020. He was given the opportunity of personal hearing in Orderly Room held on 08.10.2020. During the course of personal hearing, appellant failed to present any justification regarding his prolonged absence and accordingly, his appeal was rejected on merits as well as being time barred. Learned counsel badly failed to justify presence of appellant.

8. Learned counsel was asked in respect of the departmental appeal filed by the appellant as to when the same was presented before the appellate authority but he failed to apprise this Bench in respect of the exact date.

9. 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.

10. Having considered the matter from all angles in the light of material available on file, 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.

19.09.2022

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

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