


| Sr. No | Date of order/ proceedings | Order or other proceedings with signature of Judge or Magistrate |
|--------|----------------------------|---|
| 1 | 2 | 3 |
| | 26.05.2021 | <p style="text-align: center;"><u>BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR</u></p> <p style="text-align: center;">Appeal No. 11956/2020</p> <p style="text-align: center;">Date of Institution.. 01.10.2020</p> <p>Faqir Taj son of Zainul Abidin, No. 914 FRP, Hqrs, Khyber Pakhtunkhwa R/O Bakar Tehsil and District Swabi. ... (Appellant)</p> <p style="text-align: center;"><u>Versus</u></p> <p>1. Commandant FRP Khyber Pakhtunkhwa Peshawar and two others. ... (Respondents)</p> <p>Mr. Tanveer Minhas Advocate. ... For appellant</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>AHMAD SULTAN TAREEN, CHAIRMAN.</u></p> <p>The facts relevant to the appeal in hand are that the appellant while serving as Constable In Frontier Reserve Police was suffering from Hepatitis-C Virus and thus he remained absent from duty from 19.04.2018 till 26.11.2018. Departmental proceedings were initiated against him and Yasir Amin, DSP FRP, was appointed as enquiry officer. After submission of enquiry report, respondent No.2 issued final show cause notice to the appellant. Finally vide impugned order dated 31.12.2018, the appellant was removed from service. Feeling aggrieved, the appellant preferred departmental appeal before the Appellate Authority on 28.01.2019 which was dismissed on 04.04.2019, hence the present appeal on 01.10.2020.</p>  |

2. I have heard learned counsel for the appellant and have also gone through the available record.

3. Learned counsel for the appellant argued that the absence of the appellant was not willful but due to a chronic disease during which he remained under treatment. In support of his argument learned counsel for the appellant referred to medical prescriptions annexed with the appeal. He also argued that the appellant was jeopardized because through impugned order dated 31.12.2008 on one hand, he was removed from service while on the other hand the period of his absence was treated as leave without pay, which was not allowable under the law.

4. The copies of record annexed with the Memorandum of Appeal reflect that the appellant was proceeded against on account of his absence for about 07 months and 06 days under the Police Disciplinary Rules and was removed from service. The imposition of penalty upon the appellant resulted after serving upon him the charge sheet and statement of allegations followed by proper enquiry conducted by Mr. Yasir Aman, DSP/FRP in pursuance to his appointment as Enquiry Officer by the competent authority. It transpires from the enquiry report that the appellant after having remained absent for 07 months and 06 days reported for duty. He was served with charge sheet and summary of allegations and he replied to the charge sheet showing the reason that he remained absent due to his illness. According to findings of the enquiry officer, he also



remained absent in the past for about 106 days which period was counted as leave without pay. In pursuance to report of the enquiry officer, final show cause notice was served upon the appellant which was received by him, has been annexed with the Memorandum of Appeal. It is mentioned in the impugned order of appellant's removal from service that he neither replied in response to the final show cause notice nor did he appear before the Competent Authority in orderly room which was also taken as ground that he was not interested to serve in police active services. The record further shows that against the impugned order dated 31.12.2018, the appellant preferred departmental appeal on 28.01.2019, which was rejected on 04.04.2019. The appellant, in the ordinary course, could have approached this Tribunal within one month after rejection of his departmental appeal on 04.04.2019 but he filed instant appeal on 01.10.2020 which was time barred for more than 20 months. Learned counsel failed to explain any plausible reason for such inordinate delay. As far as the disciplinary proceedings are concerned, the relevant procedure was followed and there is nothing detectable from the proceedings to hold them as void. Therefore, the appeal having been filed after lapse of prescribed period of limitation is not maintainable under the law.



5. For what has been discussed above, the appeal at hands is bereft of merits warranting its admission for regular hearing. The same is, therefore, dismissed in limine being time barred. File be consigned to the record room.

ANNOUNCED
26.05.2021


(AHMAD SULTAN TAREEN)
Chairman

18.11.2020

Appellant in person present.

Requests for adjournment as his learned counsel is indisposed today.

Adjourned to 04.02.2021 before S.B.



Chairman

04.02.2021

Appellant in person present.

Requests for adjournment as his learned counsel is not available today due to illness. Adjourned to 26.05.2021 for hearing before S.B.



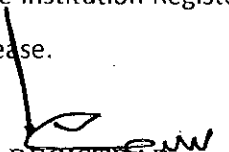
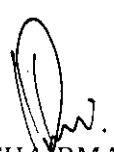
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 119056 /2020


| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 14/10/2020 | <p>The appeal of Mr. Nafeer Ullah Khan presented today by Syed Noman Ali Bukhari 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>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>18-11-2020</u></p> <p style="text-align: right;"> CHAIRMAN</p> |
| 2- | | |

The appeal of Mr. Faqir Taj son of Zain-ul-Abidin No. 914 FRP HQrs KPK Peshawar received today i.e. on 01.10.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 2- Annexures of the attested.
- 3- Annexures of the appeal may be flagged.
- 4- Approved file cover is not used.
- 5- One more/set of the memo of appeal along with annexures i.e complete in all respect may also be submitted with the appeal.

No. 2812 /S.T,

Dt. 01/10 /2020.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Tanveer Minhas Adv. Swabi.

R/sir

Re-submitted to doj on - 12/10/2020
after removing all the objections
submitted via objection slip, i.e

i) copy of departmental appeal has been
attached as annexure (E).

ii) Annexures has been attested.


iii) Annexures of the appeal has been flagged.

iv) Approved file covers has been provided.

v) One more complete set has been filed.

Minhas

Counsel for Petitioner/
Appellant


Adv
10/19/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/2020

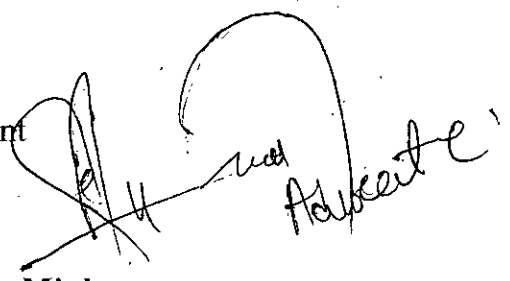
Faqir Taj No.914 FRP HQrs, KP.....Appellant
Versus

Commandant Frontier Reserve Police KPK
Peshawar & othersRespondents

I N D E X

| S.No. | Description of documents. | | Pages. |
|-------|---|---|--------|
| 1) | Memo of appeal with affidavit. | | 1-11 |
| 2) | Application u/s 5 of Limitation Act along with affidavit. | | 12-14 |
| 3) | Addresses of the parties. | | 14/A |
| 4) | Inquiry report. | A | 15-17 |
| 5) | Order dated 31.12.2018 | B | 18 |
| 6) | Copy of show cause notice. | C | 19 |
| 7) | Copy of order dated 04.04.2019 | D | 20 |
| 8) | Copy of departmental appeal. | E | 21-24 |
| 9) | Copy of medical report. | F | 25-46 |
| 10) | Wakalatnama. | | 47 |

Appellant
Through


Tanveer Minhas
Advocate High Court
At Judicial Complex Swabi
Cell: 0314-9898651

Dated: 12.10.2020

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No _____/2020

FAQIR TAJ No.914 FRP HQrs ,KP -----Appellant

Versus

Commandant Frontier Reserve Police K.P.K Peshawar
and others -----Respondents

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INDEX

| S.No | Description of Documents | Annex | Pages |
|------|--|-------|-------|
| 1. | Memo of appeal along with affidavit | | 1-11 |
| 2. | Application under section 5 of limitation Act along with affidavit | | 12-14 |
| 3. | Addresses of the parties | | 14A |
| 4. | Inquiry report | A | 15-17 |
| 5. | Order dated 31.12.2018 | B | 18 |
| 6. | Copy of show cause notice | C | 19 |
| 7. | Copy of order dated 04.04.2019 | D | 20 |
| 8. | Copy of Medical Record | E | 21-39 |
| 9. | Wakalat Nama | | 40 |

Dated 01.10.2020

Appellant

FAQIR TAJ NO 914 FRP

Through Counsel :

TANVEER MINHAS Advocate

High Court

At Judicial Complex Swabi

0314 9898651

TANVEER MINHAS
Advocate High Court
Swabi Judicial Complex

①

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No 11956 /2020

Faqir Taj son of ZAIN UL ABIDIN, No.914 FRP, HQrs, KP
Khyber Pakhtukhwa
Service Tribunal

R/O Bakar Tehsil & District Swabi

Diary No. 10857

Dated 01-10-2020

-----Appellant

Versus

1. Commandat Frontier Reserve Police K.P.K,
Peshawar at Peshawar.
2. Deputy Commandant F.R.P, KPK Peshawar at
Peshawar.
3. Yasir Aman DSP, FRP, KPK , Peshawar at Peshawar.

-----Respondents

=====

Service APPEAL UNDER SECTION 4 OF THE KP.

Filed to-day
Registrar
01/10/20
KPK
SERVICE TRIBUNAL ACT 1973 against the

impugned order dated 04.04.2019 passed by the
respondent No.1 wherein the respondent No.1 has
confirmed the order dated 31.12.2018 passed by

Re-submitted to-day
and filed.

Registrar
01/10/20
KPK

respondent No.2 and thereby confirmed recommendations of respondents No.3(inquiry officer) of major punishment, of **“removal from service”**.

PRAYER IN APPEAL

That on the acceptance of the instant appeal, the impugned order dated 04.04.2019 passed by respondent No.1 in department appeal by dismissing the same, and thereby confirming the order of major punishment of **“removal from service”** by respondent No.2 on 31.12.2018, and recommendations of respondents No.3, may kindly be set aside and the appellant may kindly be reinstated on service and any other adequate remedy which though not specifically asked for, but deems adequate in the best interest of justice may graciously be granted and obliged.

Respected Sir,

Respectfully Sheweth ;

FACTS OF THE CASE :-

1. That the appellant joined the respondent department i.e. Frontier Reserve Police, KP on 20.07.2009 as constable.
2. That the appellant serve the department for about 10 years efficiently.
3. That the appellant became ill as he was suffering from, "Chronic Hapatitious/ "HCV" from January ,2018, and due to which the appellant was unable to perform his duties, thus remained absent from his duty from 19.04.2018 till 26.11.2018 due to the reason that the appellate was under treatment .
4. That due to this reason, departmental proceedings were initiated against the appellant and respondent No.3 was deputed as inquiry officer.

4

And during the course of inquiry the appellant appeared before respondent No.3 and explained his position, regarding his absence, and also produced the entire record of his treatment.

5. That after the submission of inquiry report by respondent No.3 , respondent No.2 issued final show cause notice to which the appellant submitted his detailed reply alongwith record.

(inquiry report is annexure "A")

6. That respondent No.2 imposed major punishment of removal from service on the appellant vide order dated 31.12.2018, and thus removed him from service.

(Copy of order dated 31.12.2018 is annexure "B" show cause notice is annexure "C")

7. That the appellant being aggrieved from the order dated 31.12.2018 passed by respondent No.2, preferred departmental appeal before the appellate authority (respondent No.1), which appeal of the appellants was dismissed by respondent No.1 vide order dated 04.04.2019 and thereby maintained the

order passed by respondent No.2 of removal from service of appellant.

(Copy of order dated 04.04.2019 is annexure "D" and copy of Departmental Appeal is annexure (E)).

8. That the appellant being aggrieved from the order dated 04.04.2019 passed by respondent No.1 ,and order dated 31.12.2018 passed by respondent No.2 and the findings and recommendations of inquiry officer (respondent No.3) therefore, impugned the said orders and findings of inquiry officer, before this Honourable Tribunal inter-alia, the following grounds.

GROUNDS

A. That the impugned order dated 04.04.2019 passed by respondent No.1, impugned order dated 31/12/2018 passed by respondent No.2 and finding and recommendations of respondent No.3 are wrong, illegal, against the facts and circumstances and against the principles of natural justice, thus not tenable in the eye of law .And liable to be set at naught.

B. That the respondents while deciding the matter, has not considered, the explanation, reasoning and justification alongwith document of treatment produced by the appellant regarding his absence from duty , rather ignored or overlooked the cause shown by the appellant, hence committed gross injustice with the appellant.

C. That the "show cause notice" issued to the appellant by the respondent has categorically been answered, by giving cogent and reliable reasons by the appellant in order to justify his absence from duty and support of the reason , the appellant also produced documents regarding his treatment for his illness of HCV (Hepatitis C)

But the answer and record produced by the appellant is neither considered nor applied their judicious conscious by the respondents.

D. That as the appellant was suffering from Hepatitis C /HCV which is a cronic disease, and thus the appellant remained under regular

(7)

treatment right from January 2018 to December, 2018. And this was the genuine case of his absence from duty, but this has not been considered by the respondents while deciding cause of the appellant, which is against the principles of natural justice.

- E. That the inquiry report submitted by respondent No.3 is not in accordance with the facts and circumstances of the case, rather based on self assumptions and presumptions. and some irrelevant dates and periods has been mentioned in the inquiry report, which is not in consonance with the facts and circumstances of the case, and clearly shows the conduct and approach of the inquiry officer.

(Documents of treatment is annexure 'F').

- F. That the appellant joined the department on 20.07.2009 and till the removal from service by the respondents via impugned order, the appellant almost served the department for about 10 years .And this aspect has also not

been considered by the respondents, if in the opinion of this Honourable Tribunal the appellant is not entitle for reinstatement, they his service may kindly be considered for persionary benefits.

G. That the inquiry officer has considered previous absence of 106 day from duty of the appellant which is against the sattled principles of law and administration of justice because for that absence appellant was penalized accordingly.

H. That respondent No.2 and 3, has also not considered the cause shown by the appellant ,and without applying their judicious mind to the case, they based their order on the findings of inquiry officer, which findings is not according to the facts and circumstances of the case .Hence the order dated 31.12.2018 passed by respondent No.2 and the order dated 04.04.2019 passed by respondent No.1 are wrong and against the actual facts and circumstances, thence liable to be set aside.

I. That the appellant remains absent from duty for about 07 months due to his serious illness and remained under regular treatment thus deserve and entitle for minor punishment instead of major punishment of removal from service.

J. That great injustice has been done to the appellant by the respondents.

K. That appellant will urge any other grounds at the time of arguments with the permission of this Honourable Tribunal.

Prayer:

That on the acceptance of the instant appeal, the impugned order dated 04.04.2019 passed by respondent No.1 in department appeal by dismissing the same, and thereby confirming the order of major punishment of "removal from service" by respondent No.2 on 31.12.2018, and recommendations of respondents No.3, may kindly be set aside and the appellant may kindly be reinstated on service and any other adequate

10

remedy which though not specifically asked for,
but deems adequate in the best interest of justice
may graciously be granted and obliged.

Appellant

Dated
1-10-2020

FAQIR TAJ NO 914 FRP

Through Counsel :

TANVEER MINHAS Advocate

High Court

At Judicial Complex Swabi

TANVEER MINHAS
Advocate High Court
Swabi Judicial Complex

Advocate

1/10/2020

11

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No _____/2020

FAQIR TAJ No.914 FRP HQrs ,KP -----Appellant

Versus

Commandant Frontier Reserve Police K.P.K Peshawar
and others -----Respondents

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AFFIDAVIT

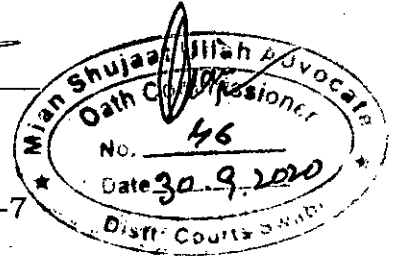
I, FAQIR TAJ son of ZAINUL ABIDEEN R/O QAZI ABAD BAKAR Tehsil and District Swabi , do hereby solemnly affirm and declare on oath that contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court .

Deponent



FAQIR TAJ

CNIC NO 16202-5614594-7



BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No _____/2020

FAQIR TAJ No.914 FRP HQrs ,KP -----Appellant

Versus

Commandant Frontier Reserve Police K.P.K Peshawar
and others -----Respondents

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SERVICE APPEAL

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APPLICATION UNDER SECTION 5 OF THE LIMITATION ACT,
1908, FOR CONDONATION OF DELAY ON BEHALF OF
APPELLANT.

Respected Sir,

Respectfully submitted as under please .

1. That the appellant did not prefer the instant appeal within the prescribed time, and for the condonation of delay submits the following grounds.
2. That the appellate was suffering from the HCV / Hepatitis "C" and remained under treatment over after the impugned orders.

- 3. That the appellant did not obtained the copy of impugned order within due time as the impugned orders did broke the heart and temperament of the appellant.
- 4. That since last 6/7 months, the judicial forums were not functionary due to covid -19
- 5. That very valuable rights of the appellant are involved in the instant case/appeal. Therefore a very lineunt view may kindly be taken and at least opportunity of hearing may kindly be given to the appellant.

Therefore, keeping in view the above mentioned grounds, the delay may kindly be condoned and the appeal may kindly be admit for proper and regular hearing and obliged.

Appellants

Dated
1-10-2020

[Handwritten Signature]

Through Counsel :

TANVEER MINHAS Advocate
High Court
At Judicial Complex Swabi
TANVEER MINHAS Advocate High Court Swabi Judicial Complex
1/10/20

14

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No _____/2020

FAQIR TAJ No.914 FRP HQrs ,KP -----Appellant

Versus

Commandant Frontier Reserve Police K.P.K Peshawar
and others -----Respondents

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AFFIDAVIT

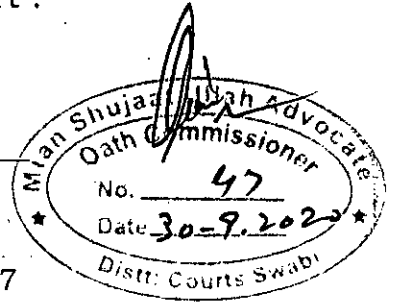
I, FAQIR TAJ son of ZAINUL ABIDEEN R/O QAZI ABAD BAKAR Tehsil and District Swabi , do hereby solemnly affirm and declare on oath that contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court .

Dated
30/9/20

Deponent FAQIR TAJ

FAQIR TAJ

CNIC NO 16202-5614594-7



14-A

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Service Appeal No _____/2020

FAQIR TAJ No.914 FRP HQrs ,KP -----Appellant

Versus

Commandant Frontier Reserve Police K.P.K Peshawar
and others -----Respondents

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ADDRESSES OF THE PARTIES

ADDRESS OF THE APPELLANT

Faqir Taj son of ZAIN UL ABIDIN No.914 FRP, HQrs, KP
R/O Bakar Tehsil & District Swabi

ADDRESSES OF THE RESPONDENTS

1. Commandat Frontier Reserve Police K.P.K, Peshawar at Peshawar.
2. Deputy Commandant F.R.P, KPK Peshawar at Peshawar.
3. Yasir Aman DSP, FRP, KPK , Peshawar at Peshawar.

Appellant

Through Counsel :

TANVEER MINHAS Advocate

High Court

At Judicial Complex Swabi

TANVEER MINHAS
Advocate High Court
Swabi Judicial Complex
1/10/20

15

Amir Khan

A

ENQUIRY REOPORT.

Constable Faqeer Taj No. 914 of FRP/HQrs: Peshawar was found absent from FRP HQrs: Peshawar without any information. A report to this effect was entered in daily diary serial No. 45 dated 19/04/2018. He reported for duty vide daily diary serial No. 16 dated 26/11/2018, after remaining absent for (07 months and 06) days. His pay was stopped vide OB. No. 259 dated 21/03/2017. He was served with charge Sheet and summary of allegation vide No. 394/PA dated 03.04.2017 and the undersigned was appointed as Enquiry Officer.

The Charge Sheet was served upon him. He replied the charge sheet which is placed at Flag "A" for favor perusal please, wherein he stated that he remained absent due to his illness.

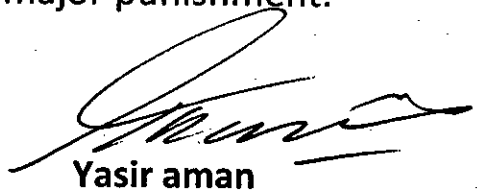
FINDINGS.

On checking the Service Record of Constable Faqeer Taj No. 914 he was enlisted as Constable 20.07.2009. In the past he was also found absent for (106) days and absence period counted as Leave without pay.

During the course of enquiry he was summoned and personal hearing opportunity given to him. He failed to give cogent ground for his ((07 months and 06) days) absence.

It is, therefore, recommended that his (07 months and 06) days absence period is recommended for major punishment.

Submitted Please.

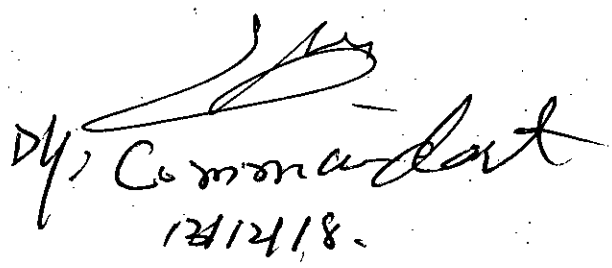
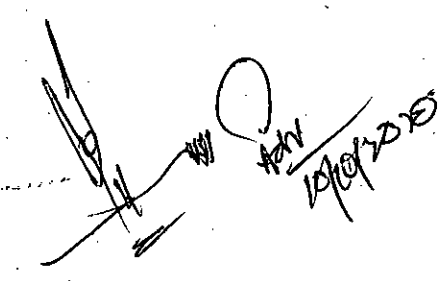


Yasir aman
DSP FRP
Lines Peshawar.

No. 50 Dated 12.12.2018.
Enclosed (26 sheets)

PA
ISSUE him FS CNL.

Alleged to be true copy



Dy. Commandant
12/12/18.

16

copy dsp

CHARGE SHEET J/S 6(1) (A) POLICE RULES 1975

You Constable Faqir Taj No. 914 at FRP/ HQrs: Peshawar is hereby charged for committing the following omission/commissions.

While posted at FRP/HQrs, remained absent from duty w.e from 19.04.2018 till date without taking any leave/permission competent authority.

You are hereby called upon to submit your written defense against the above charges before the enquiry officer.

Your reply should reach the Enquiry Officer within seven (7) days from date of receipt of this Charge Sheet, failing which ex-parte action shall be taken against you.

Summary of allegations is enclosed herewith.

کتاب 1
سینہ دینا کا ذمہ
بڑھ کر دوسروں کو
بھاری


Deputy Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar


ان

فقیر تاج ولد رئیس القاری سنہ 1974-11-21
مقامی

nic 16202-5614584-7

mob 0313-88357143

Attest

19/04/20

ORDER

UNDER SUB-SECTION-3 & SECTION 5 POLICE RULES, 1975

I, Deputy Commandant FRP, Khyber Pakhtunkhwa Peshawar as Competent Authority Charge Constable Faqir Taj No. 914 of FRP HQrs: is prima facie guilty of the following acts to be dealt with u/s 5 (3) of Police Rules, 1975.

While posted at FRP/HQrs, remained absent from duty w.e from 19.04.2018 till date without taking any leave/permission competent authority.



The act of delinquent Official falls within the ambit of gross misconduct and is liable to be proceeded under Police Rule 1975.

For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations. I, Deputy Commandant FRP, Khyber Pakhtunkhwa, being authorized officer hereby nominate enquiry officer as below to enquire into the charges within the meaning of 2(iii) under Police Rules 1975.


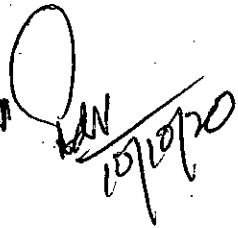
Mr. Yasir Aman DSP /FRP.

The enquiry officer after completing all enquiry proceedings should submit findings to the undersigned within stipulated period of (10) days per u/s 6(5) of the Rules.

Charge Sheet and Statement of Allegations are issued against the accused officer separately. Reply should be submitted before the Enquiry officer within the period of (07) days from the date of receipt


**Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar**
15 / 11 / 2018. 

No. 2046 /PA, dated Peshawar the
Encl: Papers () in Original.

Attested


10/10/20

(18) *Amour*
(8)

O.R.D.E.R.

This order will dispose off the Departmental Enquiry against Constable Faqir Taj No. 914 of FRP/HQrs: Peshawar.

Brief facts of the case are that Constable Faqir Taj No. 914 of FRP HQrs: Peshawar absented himself from duty with effect from 19.04.2018 to 26.11.2018 for a total period of **07 months and 06 days** without any leave/permission of the competent authority. In this regard formal departmental proceedings were initiated against him and Mr. Yasir Aman, DSP/FRP/Peshawar was nominated as Enquiry Officer. After enquiry, the Inquiry Officer submitted his findings wherein he stated that the said constable has replied in response to the Charge Sheet/statement of allegations. In his written statement the defaulter constable has narrated that due to his illness he was unable to join his duty and at the end the Inquiry Officer has recommended the said defaulter for Major punishment. He was issued Final Show Cause Notice which was received by him personally but he failed to submit reply within stipulated period. He was called so many times in Orderly Room to produce any cogent reason with regard to his prolong absence but he did not bother to appear before the Officers.

Keeping in view the recommendations of the Enquiry Officer and other material available on record it has come crystal clear that the said Constable has deliberately absented himself from duty for a long period. From perusal of his past service record it has been found that previously the delinquent constable was removed from service on two different occasions on account of his absence. However, later-on was re-instated in service on his appeal by the competent authority. Beside, the delinquent constable being a member of disciplined Force, neither replied in response to the Final Show Cause Notice, nor appear before the undersigned in orderly room, by meaning that he does not interest to serve in Police active services. Therefore, Constable Faqir Taj No. 914 of FRP/ HQrs: Peshawar is hereby Removed from Service under Police Rules 1975 amended 2014 from the date of his absence i.e. 19.04.2018 and the period of absence is treated as absence from duty without Pay.

Amour
10/10/20
NRM 8181-85

**Deputy Commandant,
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar.**

PA dated Peshawar, the 31 / 12 / 2018.

Copy to the:-

1. Worthy Commandant, FRP Khyber Pakhtunkhwa Peshawar for information please.
2. Accountant /FRP/HQrs: Peshawar.

(19)

Amir Raza

P.A

FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

I, Deputy Commandant, FRP, KPK as competent authority do hereby serve you Constable Faqeer Taj No. 914 of FRP/HQrs, Peshawar.

(1) i- That consequent upon the completion of enquiry conducted against you by Mr. Yasir Aman DSP/ FRP Peshawar for which you were given full opportunity of hearing, but you failed to submit reply in response to the Charge sheet/statement of allegation and recommend you for Major punishment.

ii- On going through the findings/recommendations of the Enquiry Officers, the material available on record and other connected papers I, am satisfied that you have committed the following acts/omissions per Police Rules 1975.

You Constable Faqeer Taj No. 914 of FRP HQrs: Peshawar absented yourself from duty with effect from 19.04.2018 to 26.11.2018 for a total period of 07 months and 06 days without any leave/permission of the competent authority. In this connection an enquiry was entrusted to DSP FRP Peshawar, who after enquiry recommend you for Major punishment.

(2) Therefore, I, Deputy Commandant, FRP, KPK as competent authority has tentatively decided to impose upon you Major/Minor penalty including dismissal from service under the said Rules.

(3) You are, therefore, required to Show Cause as to why not the aforesaid penalty should not be imposed upon you.

(4) If no reply to this Final Show Cause Notice is received within fifteen days of it delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and consequently ex-parte action shall be taken against you.

12/12/18
12/12/18

Attest

[Signature]

Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.

No. 3112 /PA
Dated 14/12 /2018

[Signature]
[Signature]
[Signature]

[Signature]
26.12

فقير تاج واپس 14 دسمبر 2018 کو جواب دیا
16202-5614594-7

(20) *Amexuse* (D)

ORDER

This order will dispose of the departmental appeal preferred by ex-constable Faqir Taj No. 914 of FRP HQrs; against the order of Deputy Commandant FRP, KP issued vide OB No. 12, dated 02.01.2019, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that during the course of his duties he absented himself from duty with effect from 19.04.2018 to 26.11.2018 for a total period of 07 months and 06 days without any leave/permission of the competent authority.

In this regard formal departmental proceedings were initiated against him and Mr. Yasir Aman, DSP FRP Peshawar was appointed as Enquiry Officer to conduct proper enquiry against him. After completion of enquiry the Enquiry Officer submitted his findings wherein he reported that the said constable has replied in response to Charge Sheet. In his written statement the delinquent constable has narrated that due to his illness he was unable to join his duty and at the end the Enquiry Officer recommended him for major punishment.

In the light of recommendation of Enquiry Officer he was issued Final Show Cause Notice, to which he received personally, but he failed to submit reply within stipulated period. He was called so many times in orderly room to defend himself, but he failed to do so.

From perusal of his service record it has been found that previously the delinquent constable was removed from service on two different occasions on account of his absence. However, later he was re-instated in service on his appeal by the competent authority.

In the light of the above narrated facts it has been come crystal clear that the delinquent constable no more interest to serve in Police Department. Therefore, he was removed from service vide OB No. 12, dated 02.01.2019.

Feeling aggrieved against the impugned order of Deputy Commandant FRP, KP the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 03.04.2019.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. According to his previous conduct 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.

Keeping in view the above facts there doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, I, **Sajid Ali PSP** Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore the same is rejected and filed being badly time barred and meritless.

Order Announced.

Attested

10/04/20

Commandant

Frontier Reserve Police

Khyber Pakhtunkhwa, Peshawar

No. 3222-23/EC, dated Peshawar the 04 / 04 / 2019.

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

1. Deputy Commandant FRP, KP, Peshawar. His service record alongwith D-file sent herewith.

2. Ex-constable Faqir Taj No. 914 S/O Zain Ul Abidin, Police Station Swabi, Village Bakar Qazi Abad, District Swabi.

Annexure
E

21

1

**BEFORE THE HONOURABLE APPELLATE AUTHORITY/
COMMANDANT FRONTIER RESERVE POLICE,
KHYBER PAKHTUNKWA**

Subject: **DEPARTMENTAL APPEAL UNDER RULE 11 (1) OF
THE KHYBER PAKHTUNKHWA POLICE RULES 1975,
AGAINST THE ORDER DATED: 31/12/2018, PASSED BY
THE DEPUTY COMMANDANT FRONTIER RESERVE
POLICE KHYBER PAKHTUNKHWA, PESHAWAR.**

RESPECTFULLY SHEWETH:

The Departmental appeal is submitted as under:

1. That the appellant namely Faqir Taj belt No, 914 is a constable of Frontier Reserve Police (FRP), Khyber Pakhtunkhwa posted at Headquarters, Peshawar.

(Photocopy of the service card is attached)

2. That the appellant has been ordered removed from the service through the impugned order dated 31/12/2018 on account of absence from duty without pay.

(Attested copy of the impugned order is attached)

3. That the appellant has been removed from service by the Deputy Commandant FRP Peshawar/Competent Authority through the impugned order without any just cause and proper proceedings.
4. That the appellant has been held delinquent by the competent authority on account of his absence from duty.

Attested
Taj
TANVEER MISTAS
Advocate High Court
Swabi Judicial Complex

5. That the appellant never absented from his duty and is ailing from Hepatic 'C' and bed ridden.

(Copies of the treatment record attached)

6. That the appellant due to his ailment was unable to attend his duty and being severely ill was unable to communicate his illness and inability on time to the office concerned.
7. That it has been held through impugned order by the competent authority that an inquiry was conducted by the inquiry officer concerned, wherein he was charge sheeted and statement of allegations was delivered.
8. That the inquiry officer has not acted in accordance with Rule 6 (i) of the Rules *ibid*, as neither the appellant appeared before any inquiry officer nor has any service/ notice/ statement etc. ever served upon him for appearance.
9. That the inquiry officer without conducting proper proceedings and hearing the appellant has recommended the appellant Major penalty and therefore, acted in contravention with the relevant rules.
10. That the alleged inquiry is based on fictitious proceedings against the appellant resulting into illegal and irregular findings of the authority.
11. That no final show-cause notice was ever served upon the appellant as required under the relevant rules, despite the fact that the appellant was bed ridden and his address was already known but no such steps were taken by the concerned authority.

23

Dated: 28/01/2019

12. That the appellant is poor person, still suffering from Hepatitis C (Genotype 3) which treatment require the period of 06 months to 01 years for recovery.

13. That the competent authority without considering such facts without providing any opportunity to the appellant has ordered the removal of the appellant through the impugned order in a hasty and irregular manner which order is not sustainable under the law and relevant rules, therefore, liable to be set aside.

It is therefore, most humbly prayed that on the considering the above submitted grounds, the order of the Deputy Commandant FRP Peshawar dated 31/12/2018 may kindly be set aside and appellant may very graciously be reinstated, please.

Dated: 28/01/2019

Appellant
Faqir Taj belt No, 914
Constable of FRP, KPK
Cell# 0313-9835143

ATTESTED

Through counsel

Khurshid Khan Adina
Advocate High Court,
At Judicial Complex Swabi
Cell# 0345-9588273

28/01/19
KHURSHID KHAN ADINA
Advocate High Court
At Judicial Complex Swabi

24

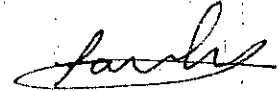
**BEFORE THE HONOURABLE APPELLATE AUTHORITY/
COMMANDANT FRONTIER RESERVE POLICE,
KHYBER PAKHTUNKWA**

AFFIDAVIT

I, Faqir Taj S/o Zain-Ul-Abidin belt No. 914 is a constable of Frontier Reserve Police (FRP) Khyber Pakhtunkhwa posted at Headquarters, Peshawar permanent resident of village Bakar tehsil & District Swabi do hereby solemnly affirm and declare that contents of this **Departmental Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Appellate Authority.

ATTESTED

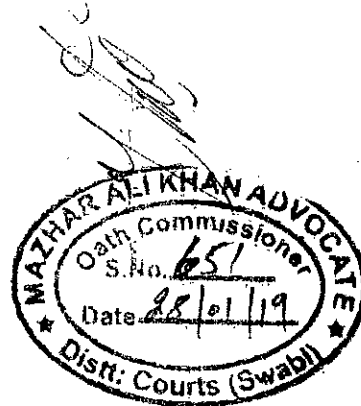
DEPCENT



FAQIR TAJ

CNIC No. 16202-5614594-7

Dated: 28/01/2019



Amir Ali
F
25

Lab. Report

Acc ID: 12-18113
 Patient's Name: FAQEER TAJ
 Referred By: SADIQ LAB
 Reg. Date: 15-01-2018

Lab No: 1991
 Age: .. Years Gender: Male
 Panel: SAWABI
 Printing Date: 18-01-2018

Hepatitis C virus RNA PCR (Quantitative)

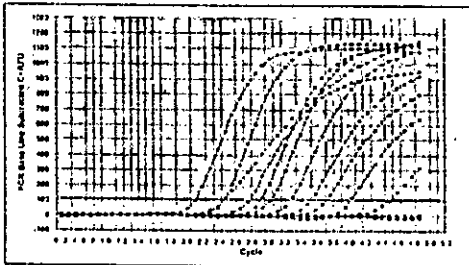
Result: HCV RNA DETECTED

TITRE: 36439 Copies/ml

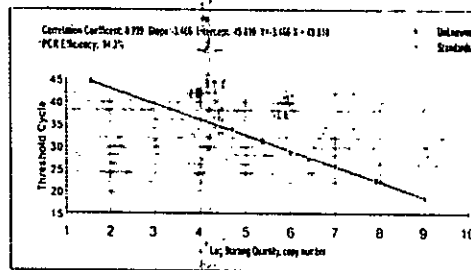
(Cutoff Value:150 copies/ml)

Methodology:

Real Time PCR is the most advance techniques used in invitro diagnostic to detect the viral load of Hepatitis C virus in the serum/plasma. HCV RNA is extracted from the sample, amplified by using the Real Time Amplification and Detection kit having the florescent reporter dye (FAM) probes, specific for HCV 5' UTR, specific primers for amplification. Negative and positive controls used to maintain the quality. Eight quantitation standards were used to make the standard curve. The viral load of the sample was determined with the help of their threshold cycle and standard curve.



Patient Amplification Plot



Standard curve plot

Comments:

1- The titer of HCV in Blood fluctuates in accordance with the virus latency & some times it may be absent or below the sensitivity limit of the assay.

Free Sample Repeat within 24 hours

Maj. (R) Prof. Dr. M. Nadeem Akbar Khan
 M.B.B.S., Dip Path, M.C.P.S., F.C.P.S. (Pa)
 Professor of Pathology
 Consultant Pathologist

Dr. Masood Ahmad Khan
 M.B.B.S., (BZU), M.C.P.S. (Pa)
 M.Phil (Oau)
 Associate Professor Pathology
 Consultant Histopathologist

Dr. Amna Mubashar
 M.B.B.S., C.D.D.U (Teleson Pak)
 Sonologist

Dr. M. Majid Bashir
 PhD, Forensic Genetics (UK)
 Consultant Molecular Biologist

Mr. Qaiser Muhammad Khan
 MSc (UAF), M.Phil (CEMB)
 Consultant Molecular Biologist

Mrs. Zohida Haider
 M.Sc. (UAF) M. Phil (UAF)
 Ph.D Scholar (NARC) Islamabad.
 Director

M. Sadiq Khan
 M. Phil Microbiology
 Consultant Microbiologist

Mr. Shahroz Khan
 MSc (DAU), M.Phil (DAU)
 Molecular Virologist

Amir Ali
TANVEER MUHAMMAD
 Swabi JUDGE
 07/01/2018
 Pathologist

26

Lab. Report

| | | | |
|----------------|------------|----------------|--------------------|
| Acc ID: | 12-18132 | Lab No: | 896 |
| Patent's Name: | FAQEER TAJ | Age: | Years Gender: Male |
| Referred By: | SADIQ LAB | Panel: | SAWABI |
| Reg. Date: | 07-02-2018 | Printing Date: | 13-02-2018 |

Hepatitis C virus Genotype

Result: HCV 3a Genotype

Methodology:

The PCR (Polymerase Chain Reaction) is a procedure by which extracted RNA is amplified. The technology uses basically three processes; extraction of RNA, amplification of target sequence, and detection of particular product (s). The extraction of HCV RNA from the patient sample is done with series of manipulations and nucleic acid precipitations. The RNA extracted is used to generate specific amplicons by PCR technique. Sequence specific primers in Non translational region (5' NTR) of the Hepatitis C Virus genome is used for this purpose. The RNA is converted to cDNA by reverse transcriptase (RT) followed by second round of amplification with nested pairs of primer. After the second amplification specific target sequence for particular genotype (s) were detected by 1.8% agarose gel electrophoresis. Ethidium Bromide staining under UV light visualizes the amplified DNA. The amplification processes are run in lieu with positive and negative controls.

The test has the sensitivity of 65-85 % and specificity of 97-99%.

Suggestions

Positive test indicates the presence of Hepatitis C virus circulating in blood of the patient with particular genotype. In this context, it is important to interpret the result in accordance with symptoms, clinical finding, and investigations. Types 3a, 3b and 2a 2b of HCV are common in Asia (Nakai et al., 2001; JCM. 39 (4): 1536). Luckily the genotype 2 and 3 of HCV are more sensitive to interferon therapy as compare to genotype 1 (1a & 1b) and 4 (Dusheiko et al., 1996; B. M. J., 312). The recommendation is treatment for six months for genotype 2 and 3 with viral load less than 2 million copies/ml. Treatment for genotype 1 and 4 is 12 months and high viral load greater than 2 million copies/ml. (Chinese American Health Issue.2000. www.camsociety.org). So, pre-treatment viral load and genotype is important.

[Signature]
Pathologist

Free Sample Repeat within 24 hours

- | | | | | | | | |
|---|--|--|--|--|---|--|---|
| Maj. (R) Prof. Dr. M. Hadeem Akbar Khan M.B.B.S., Dip Path, M.C.P.S., F.C.P.S. (Pak) Professor of Pathology Consultant Pathologist | Dr. Masood Ahmed Khan M.B.B.S., (BZU), M.C.P.S. (Pak) M.Phil (Dau) Associate Professor Pathology Consultant Histopathologist | Dr. Arna Mubashar M.B.B.S., C.D.D.U (Teleson Pak) Sonologist | Dr. M. Majid Bashir PhD, Forensic Genetics (UK) Consultant Molecular Biologist | Mr. Qaiser Muhammad Khan MSc (UAF), M.Phil (CEMB) Consultant Molecular Biologist | Mrs. Zahida Haider M.Sc. (UAF) M. Phil (UAF) Ph.D Scholar (IARC) Islamabad. Director | M. Sadiq Khan M. Phil Microbiology Consultant Microbiologist | Mr. Shahroz Khan MSc (DAU), M.Phil (DAU) Molecular Virologist |
|---|--|--|--|--|---|--|---|

Head Office: E-1-Near Holy Family Stop, E-Block, Satellite Town, Main Saidpur Road, Rawalpindi. Ph: +92-51-4413804
E-mail: admin@biotechlabs.com.pk, Website: www.biotechlabs.com.pk

[Handwritten signatures and stamps]
Swabi Judicial Commission
20

27



SHAMS ENTERPRISES

40-karachi Market Khyber Bazar Peshawar

House Of Quality Vaccines & Immunoglobulins

PH.#: 091-2552241

Fax #: 091-2562953

Mob: 0333-9110585

B.No. 546
M/S _____

FAGIR TAS

Date: 22.04.018

| Description | Qty. | Rate | Amount | |
|--|-----------|-------------|------------------------------|-----|
| | | | Rs. | Ps. |
| <i>Hilly</i> | <i>01</i> | <i>6000</i> | <i>6000</i> | |
| <i>Bx? 3-20</i> | | | | |
| <i>Lot 126156</i> | | | | |
| <i>Dr. Dilaram Khan</i> FCPS (Gastroenterology) Assistant Professor Gastroenterology Ward MTI, URH Peshawar. | | | | |
| | | | Total Rs. <i>6000</i> | |

FORM 2A (See Rules 19 & 30)

I mukhtiar Ali S/o Shams-ul-Qamar being a person resident in Pakistan, carrying on business at 40 karachi market khyber bazar peshawar under the name of m/s shams enterprises do hereby give this warranty that the drugs here, under described sold/indented by Me/specified and contained in the bill of lading or other document describing the goods referred to herein in do not contravene in any way the provisions of section 23 of the drug Act 1976.

Signature

Attested

[Signature]
FAGIR TAS
Associate High Court
Swabi Judicial Commission



SHAMS ENTERPRISES

40-karachi Market Khyber Bazar Peshawar
House Of Quality Vaccines & Immunoglobulins

PH.#: 091-2552241
Fax #: 091-2562953
Mob: 0333-9110585

B.No. 573
M/S _____

FABIR TAJ

Date: 22.06.08

| Description | Qty. | Rate | Amount | |
|--|-----------|-------------|-------------|-----|
| | | | Rs. | Ps. |
| <i>Uilcol</i> <i>BR 3-20</i> <i>Co. 126156</i> | <i>01</i> | <i>6000</i> | <i>6000</i> | |
| Total Rs | | | <i>6000</i> | |

Dr. DILARAM KHAN
FCPS (Gastroenterology)
Assistant Professor
Gastroenterology Ward
MTI, LRH Peshawar.

FORM 2A (See Rules 19 & 30)

I Mukhtiar Ali S/o Shams-ul-Qamar being A person resident in Pakistan carrying on business at 40 karachi market khyber bazar peshawar under the name of m/s shams enterprises do hereby give this warranty that the drugs here, under described, sold/indentured by Me/specified and contained in the bill of lading or other document describing the goods referred to herein do not contravene in any way the provisions of section 23 of the drug Act 1976.

Signature

Attested
[Signature]
MUKHTIAR ALI
Advocate High Court
Swabi Judicial Complex

Lab. Report

Acc ID: 12-18272
 Patent's Name: FAQEER TAAJ
 Referred By: SELF
 Reg. Date: 30-05-2018

Lab No: 4988
 Age: .. Years Gender: Male
 Panel: SAWABI
 Printing Date: 12-06-2018

Hepatitis C virus RNA PCR (Quantitative)

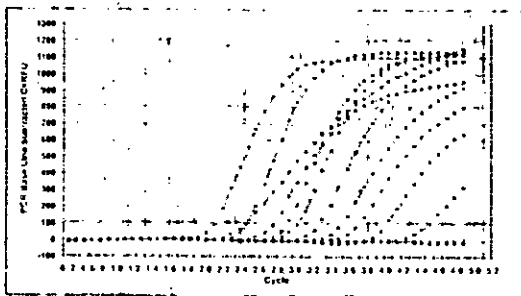
Result: HCV RNA NOT DETECTED

TITRE: Below Sensitivity

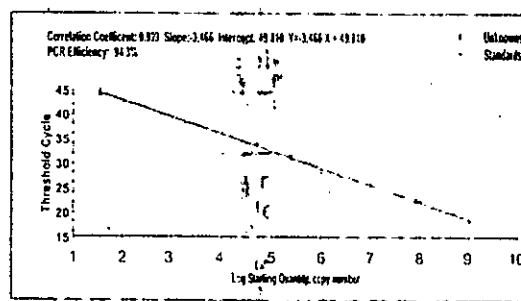
(Cutoff Value:150 copies/ml)

Methodology:

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Patient Amplification Plot



Standard curve plot

Comments:

1- The titer of HCV in Blood fluctuates in accordance with the virus latency & some times it may be absent or below the sensitivity limit of the assay..

Attested

FAQEER TAAJ
 Director

Free Sample Repeat within 24 hours

Maj. (R) Prof. Dr. M. Nadeem Akbar Khan
 M.B.B.S., Dip Path, M.C.P.S., F.C.P.S. (Pak)
 Professor of Pathology
 Consultant Pathologist

Dr. Masood Ahmed Khan
 M.B.B.S., (BZU), M.C.P.S. (Pak)
 M.Phil (Dau)
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 Director

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 M. Phil Microbiology
 Consultant Microbiologist

Mr. Shahroz Khan
 MSc (DAU), M.Phil (DAU)
 Molecular Virologist

Pathologist

30

Mohmand

Medical Doppler Ultrasound & ECG Services

MOHMAND MEDICAL COMPLEX

Add: Mohmand Medical Complex,
Dabgari Garden Peshawar.
Mob: 0300-5933668 / 0311-9703668

Name: Faqir Taj
Ref By: Urologist,
Dr Mir Abid Jan

Date: 25 October 2018
Referral No: Bio-05

Abdominal Ultrasound

Liver is normal in size, shape and echotexture. No focal lesion seen in it.
Portal vein and CBD measure within normal limits.
No intra or extra hepato-biliary channel dilation appreciated.
Gall bladder appears normal. No stone, mass or sludge seen in it.
Spleen measures within normal limits, no focal lesion seen in it.
Pancreas appears normal with normal echogenicity.
Both kidneys appear normal in size, shape, location and echopattern. No stone or hydronephrosis demonstrated on either side.
No para-aortic lymph nodes enlargements seen.
No free or loculated fluid in the peritoneal cavity or pleural cavity identified.

Pelvic Ultrasound

Urinary bladder is partially filled.
Prostate is in upper limit of normal 23 grams.

Impression:

- Normal study.

Dr Junaid Khan
DMRD, FRM

Doctors are requested to provide relevant history of the patient on referral for radiological examination. Thank you.

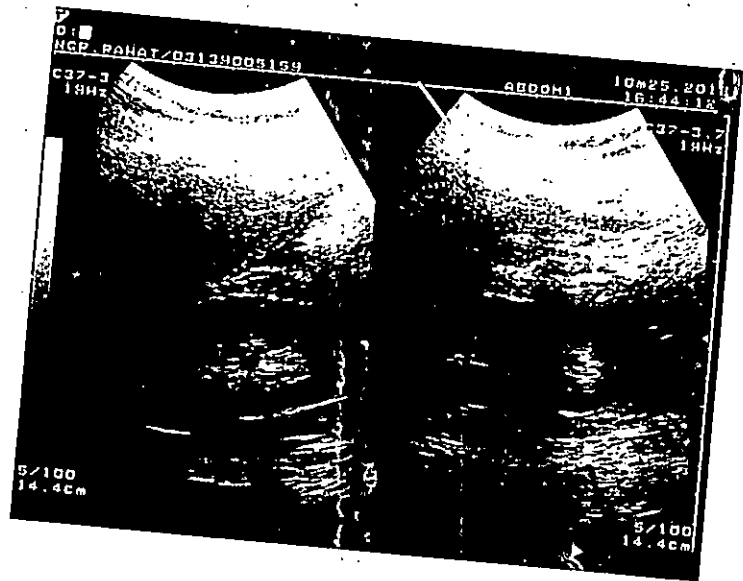
Attested

TANVEER AHMED
25.10.2018
Mohmand Medical Complex

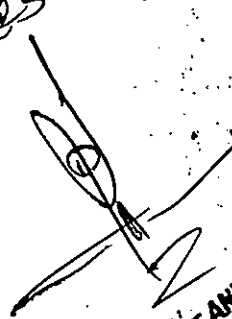
The Report can not be used for Medico Legal Purpose.

If Report does not correlate with clinical findings, you can always ask for a second free opinion.

31



Attested


TANVEER MINHAL
Advocate High Court
Swaha Judicial Complex
10/25/2011

32

Urologist & Andrologist Dr. Mir Abid Jan

MBBS, MCPS (Surgery) FCPS (Urology)
CRSM (Sexual Medicine)
Fellowship Male infertility &
Sexual Medicine

Member Pakistan Association Urological Surgeons (PAUS)
Member International Society of Sexual Medicine (ISSM)
Member European Society of Sexual Medicine (ESSM)
Member American Society of Reproductive Medicine (ASRM)

Senior Registrar
Institute of Kidney Diseases
Hayatabad Medical Complex
Peshawar.



Free

Examination 16

number

5/10/18

U

Prostate thick R > L

Dysuria

Weak stream

Poor stream

on

Handwritten symbol resembling a stylized 'S' or 'J'.

Tested

WBC/RBC/S.crit
U/S abd/Pelvis

Prostate comp
U @ C @

Prostate SR 047

g - U C R J S @

Urine

Prostate size

Handwritten symbol resembling a stylized 'S' or 'J'.

TANVEER NIWAZI
Advocate High Court
Swabi Judicial Commission

Assistant Professor

Dr. Dilaram Khan

MBBS, FCPS (Gastroenterology)

Consultant Gastroenterology

Gastroenterology Unit

Lady Reading Hospital MTI, Peshawar



Institutional Based Private Practice

OPD Block, Lady Reading Hospital (L.R.H)

Medical Teaching Institute MTI Peshawar

33

Name: Faqeer Taj Age: _____ Sex: M Date: 20/11/18 Receipt #: _____

Clinical Record / History

Rx

It is certified that Mr Faqeer Taj was having chronic Hepatitis C & was treated with Sofosbuvir & velpatasvir combination therapy for three months from 22-4-18 to 22-7-18 & is now fit for duty

Attested

(Handwritten signature and date 20/11/18)

(Handwritten signature)

Dr. DILARAM KHAN
FCPS (Gastroenterology)
Assistant Professor
Gastroenterology Ward
MTI, LRH Peshawar.

TANVEER ANJUM
Advocate High Court
Swabi Judicial Commission

For Appointment Contact#: 091-9213513

ماہ بعد معائنے کیلئے تشریف لائیں

Dr. Imtiaz Khan

Senior Medical Officer

34



ڈاکٹر امتیاز خان

سینئر میڈیکل آفیسر

Name:

Faqir Taj

Age:

Sex:

M

Date:

18.12.18

Clinical Record

Rx

Mr Faqir Taj suffered
from urinary tract
infection and taken
treatment for UTI
from 24.10.18
and 16.11.18

شمس ہسپتال

نزدراولپنڈی پشاور سینڈ شیوہ اڈہ

PH: 0938-311143

Mob: 0313-9836794

18.12.18

Attested

چھٹی برہانوار

TANVEER ALI
Advocate High Court
Swabi Judicial Complex

Ph:0938-311143

Mob:0310-8699978

نزدراولپنڈی پشاور سینڈ مردان روڈ شیوہ اڈہ (صوابی)

شمس ہسپتال

Not Valid for Court

(35)

Min. Contrast CF - KUB
e 57)

R Azomax 250
1 + 1

(3)

Cap 11/2 2 in 100
1 + 1

(14)

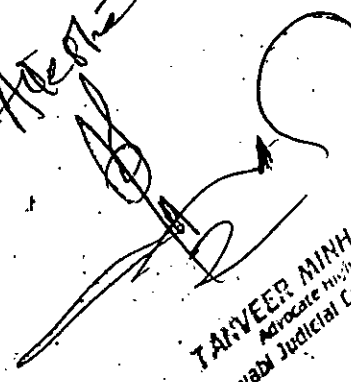
M Danyen DS
2 + 2

(10)

B Soufen 100
1 + 1

(10)

Attested


TANVEER MINHAS
Advocate High Court
Swabi Judicial Complex

10/10/20

SHAMS

26



COMPUTERIZED MEDICAL LAB

Date: 24 October 2018

TIME: 5:14:06 AM

Lab No: 703

Patient Name: FAQIR TAJ

Sex: MALE

Age: ? Yrs

Investigation Required: URINE R/E

Consultant: DR IMTIAZ KHAN

URINE ANALYSIS

PHYSICAL EXAMINATION

Colour : PALE YELLOW

CHEMICAL EXAMINATION

Ph : ACIDIC

Proteins : NIL

Glucose : NIL

MICROSCOPIC EXAMINATION

Pus cells : 18-20/HPF

R B Cs : 06-08- /HPF

Epith Cells : NIL /HPF

Crystals : NIL /HPF

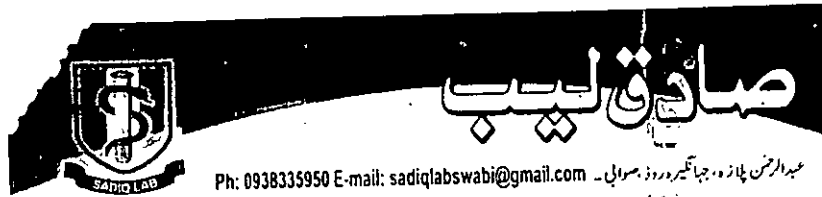
Calcium Oxalate : NIL /HPF

Tested

Adw
TANVEER MINHAJ
Associate Analyst
Swabi Judicial Complex

Lab. Incharge *[Signature]*

Near Rawalpindi Peshawar Stand, Mardan Road Shewa Adda (Swabi)
Contacts: 0938-311143, 0313-9836794



38

Ph: 0938335950 E-mail: sadiqlabswabi@gmail.com

No. 2395

Payment Receipt

Date 07.02.2017

Received with thanks from Faguer Taj

the sum of Rupees Four thousand one hundred

On Account of HCV Genotyping

By Cash/Cheque No.

Rs. 4100/-

For Sadiq Lab



Ph: 0938335950 E-mail: sadiqlabswabi@gmail.com

No. 2400

Payment Receipt

Date 30.05.2018

Received with thanks from Faguer Taj

the sum of Rupees Three thousand one hundred

On Account of HCV RNA Quantitative PCR

By Cash/Cheque No.

Rs. 3100/-

For Sadiq Lab

Attested



Ph: 0938335950 E-mail: sadiqlabswabi@gmail.com

No. 2389

Payment Receipt

Date 15-01-2018

Received with thanks from Faguer Taj

the sum of Rupees Three thousand one hundred

On Account of HCV RNA Quantitative PCR

By Cash/Cheque No.

Rs. 3100/-

For Sadiq Lab

TANVEER ANSARI
Advocate High Court
Swabi Judicial Commission

Dr. Imtiaz Khan

Senior Medical Officer



(39)

ڈاکٹر امتیاز خان

سینئر میڈیکل آفیسر

Name: Faqir Taj Age: _____ Sex: MC Date: 24.10.18

Clinical Record

Rx

Pain in Lt
Inguinal region
and Lt testis

Cap. Rovatins

Tab. _____

Tab. Nolo 400

Tab. Analofentan-plus

Tab. Steam sup

✓ Sodd. Cranberry

21/10/18

Ad
Gm 1/2
X-ray KUB
C/Sr abd
pelvis

~~Tested~~

Signature and date: 17/10/18

Ph:0938-311143
Mob:0310-8699978

Not Valid for Court

TANVEER
Advocate
Swabi Junction Complex
زوراولپنڈی پشاور سینٹر

شمس ہسپتال



40

DUA

Clinical Laboratory

Molecular
Diagnostic
Division
HRA Reg No. 00463

DISCLAIMER: THIS FORM CAN BE USED FOR PATIENT REPORTS

Patient's Name: FAQEER TAJ

Age 30 Yrs, Sex: M

Consultant: Dr: MIR ABID JAN

Date: 25-Oct-18

Specimen: BLOOD

Time: 5:10:12 AM

In, Req: CBC

Lab No: 4378

TEST REPORT

Complete Blood Counts:

| | | | | | |
|-------------|------|---|-------------|----|---------------|
| Haemoglobin | 15.5 | g/dl (M, 13.5 - 19.5) (F, 12.0 - 14.0) | Neutrophils | 61 | % (40 - 70) |
| WBC | 8.6 | X 10 ⁹ /l (4.0 - 11.0) | Lymphocyte | 34 | % (10 - 39) |
| Platelets | 238 | X 10 ⁹ /l (150 - 400) | Monocyte | 03 | % (1 - 4) |
| RBC | 6.7 | X 10 ¹² /l (3.5 - 5.8) | Eosinophil | 02 | % (1 - 3) |
| PCV | 48.7 | l/l (36 - 44) | Basophil | 00 | % (0.1 - 1.0) |
| MCV | 72.1 | fl (80 - 100) | | | |
| MCH | 23.0 | pg (24 - 30) | | | |
| MCHC | 31.8 | g/dl (30 - 35) | | | |

Arrested

[Signature]

TANVEER MINHAS
Advocate High Court
Swabi Judicial Complex

15/10/18

Not Valid For Court

Lab Incharge

Samad Building, Dabgari Garden Peshawar Ph. 091-2567795, 0321-9744550



41

DUA

Clinical Laboratory

Molecular
Diagnostic
Division
HRA Reg No. 00463

DISCLAIMER: THIS FORM CAN BE USED FOR PATIENT REPORTS

Patient's Name: FAQEER TAJ

Age 30 Yrs, Sex: M

Consultant: Dr: MIR ABID JAN

Date: 25-Oct-18

Specimen: BLOOD

Time: 5:04:04 AM

In, Req: S.CREAT

Lab No: 4378

TEST REPORT

Serum Creatinine:

Result

0.8

mg/dl

Ref. Range

(0.5 - 1.5)

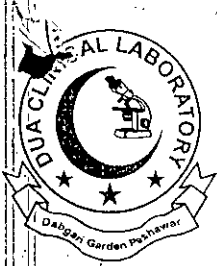
Attested

[Signature]
TANVEER MINH
Advocate High Court
Swabi Judicial Complex
10/10/2018

Not Valid For Court

Samad Building, Dabgari Garden Peshawar Ph. 091-2567795, 0321-9744550

Lab Incharge



42

DUA

Clinical Laboratory

Molecular Diagnostic Division
HRA Reg No. 00463

DISCLAIMER: THIS FORM CAN BE USED FOR PATIENT REPORTS

Patient's Name: FAQEER TAJ

Age 30Yrs, Sex: M

Consultant: Dr: MIR ABID JAN

Date: 25-Oct-18

Specimen: URINE

Time: 5:03:22 AM

In,Req: URINE R/E

Lab No: 4378

TEST REPORT

Urine Routine Examination:

| | | | | |
|--------------|----------|------------------|---------|-------|
| Colour | Yellow | | | |
| Appearance | Turbid | | | |
| Sp. Gravity | 1.020 | WBCs (Pus Cells) | 04 - 06 | / HPF |
| pH | 6.0 | RBCs (Red Cells) | 08 - 10 | / HPF |
| Protein | Trace | Epithelial Cells | Nil | / HPF |
| Glucose | Nil | Ca. oxalate | Nil | / HPF |
| Ketones | Negative | Granular casts | Nil | / HPF |
| Urobilinogen | Normal | A. urates | Nil | / HPF |

Attested

(Signature)
TANVEER MIR
Agg. High Court
Swabi Judicial Complex

10/10/18

Not Valid For Court

Lab Incharge

Samad Building, Dabgari Garden Peshawar Ph. 091-2567795, 0321-9744550

43

فرنیئر میڈیکوز

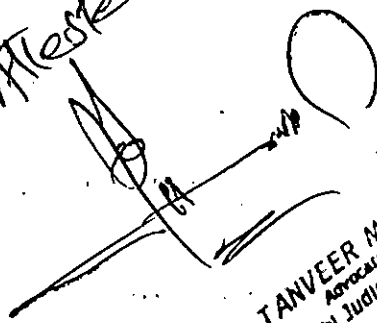
دوکان نمبر 3 ہسپتال روڈ پشاور۔ فون: 091-2566373

تاریخ:

24
2023
107
76

410
400

Attested



Adv
TANVEER MINHAL
Advocate High Court
Swabi Judicial Complex

44

Cash Memo

FRONTIER MEDICOSE

Shop No. 3, LRH Road, Peshawar City. Ph: 091-2566373

No. 1259

Date

Name

| Q No. | PARTICULARS | Rate | Amount Rs. |
|-------|---------------|--------------|------------|
| 1 | Boufen 400 | | 24 |
| 6 | Azomax 250 | | 203 |
| 10 | Danzen DS | | 107 |
| 12 | Vibramycin | | 76 |
| | | Total | 407 |

Signature

Attested

TANVEER MINVI
Adv
Advocate High Court
Swabi Judicial Complex
20/10/20

45



SHAMS ENTERPRISES

40-karachi Market Khyber Bazar Peshawar
House Of Quality Vaccines & Immunoglobulins

PH #: 091-2552241
Fax #: 091-2562953
Mob: 0333-9110585

B.No. 560
M/S FABIRI RAS

Date: 22-05-018

| Description | Qty. | Rate | Amount | |
|-------------|------|-----------------|--------|-----|
| | | | Rs. | Ps. |
| H1Cair | 01 | 6000 | 6000 | |
| RP-3-20 | | | | |
| Lot 126156 | | | | |
| | | Total Rs | 6000 | |

[Signature]
25/5/18
Dr. DILARAM KHAN
FCPS (Gastroenterology)
Assistant Professor
Gastroenterology Ward
MTI, LRH Peshawar.

FORM 2A See Rules 19 & 30

I mukhtiar Ali S/o Shams-ul-Qamar being A person resident in Pakistan carrying on business at 40 karachi market khyber bazar peshawar under the name of m/s shams enterprises do hereby give this warranty that the drugs here under described sold/indented by Me/specified and contained in the bill of lading or other document describing the goods Referred to heren in do not contravence in any way the provisions of section 23 of the drug Act 1976.

Signature

Attested

[Signature]
TANVEER
Advocate High Court
Swabi Judicial Complex

46
Dr. Imtiaz Khan

Senior Medical Officer



ڈاکٹر امتیاز خان
سینئر میڈیکل آفیسر

Name: Faqir Taj Age: _____ Sex: M Date: 16.11.18

Clinical Record

Rx

9
o Pain Hypogastri-
ac and Urethrae

Cap Caricef 400mg
qd

Tab Analofentan- plus
qd

Tab Atcam sup
qd

Sacchar Cran Berry
qd

Attested

چوہدری انوار

MA

19/11/18

Ph:0938-311143
Mob:0310-8699978

مرکز درد اور لیبندگی (صوابی)

TANZIMUDDIN
SWABI JUDICIAL COMMISSION

Not Valid for Court

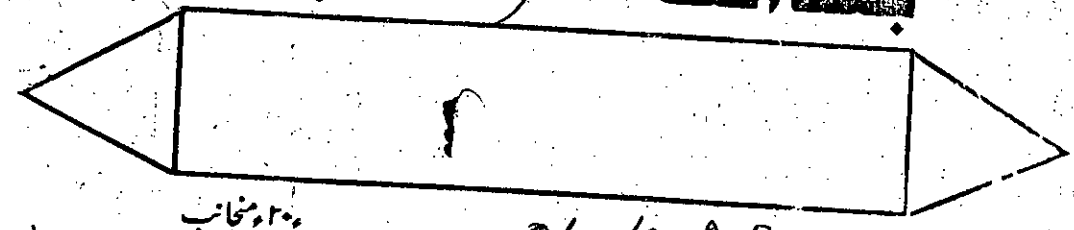
شمس ہسپتال

ڈاؤن ٹاؤن خزانہ بمقام

(47)

40

بعد الت



مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی مکمل
 کارروائی متعلقہ آن مقام کے لئے
 مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز
 وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زیر اس پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور
 منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ
 مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے۔ اور اس کا ساختہ
 پرواختہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائد التوائے مقدمہ کے سبب سے ہوگا۔
 اس کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔
 اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب یا بندہ ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا اوکالت نامہ لکھ دیا کہ سند ہے۔

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی مکمل
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 مذکور کریں۔ لہذا اوکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 01/10/2020

العبد گواہ شہد العبد

Attested & accepted
For appellant

0319 98 98651

TANVEER KHAN
Advocate
Shah Jahan Complex
201

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی مکمل
کارروائی متعلقہ آن مقام کے لئے