

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR AT CAMP COURT ABBOTTABAD

Service Appeal No. 822/2020

Date of Institution

... 04.02.2020

Date of Decision

... 20.07.2022

Shakeel Ahmed Ex-Constable No. 509, Village Langra, P.O Havelian, Tehsil & Havelian, District Abbottabad

(Appellant)

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and two others.

(Respondents)

MR. MUHAMMAD ARSHAD KHAN TANOLI,

Advoćate

For appellant.

MR. NOOR ZAMAN KHATTAK,

District Attorney

For respondents.

MR. KALIM ARSHAD KHAN

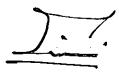
CHAIRMAN

MR. SALAH-UD-DIN

MEMBER (JUDICIAL)

JUDGMENT:

SALAH-UD-DIN, MEMBER:- Brief facts giving rise to filing of instant service appeal are that, disciplinary action was taken against the appellant on the ground of his absence from duty. On conclusion of the inquiry, the appellant was dismissed from service vide O.B No. 220 dated 02.08.2018. The departmental appeal of the appellant was declined vide order dated 08.07.2019. The appellant then preferred revision petition before Inspector General of Police Khyber Pakhtunkhwa Peshawar. Vide order dated 06.01.2020 issued from the office of Inspector General of Police Khyber Pakhtunkhwa Peshawar, the penalty of dismissal from



service was converted into removal from service, hence the instant service appeal.

- 2. Respondents contested the appeal by way of submitting para-wise comments, wherein they refuted the assertions raised by the appellant in his appeal.
- 3. Learned counsel for the appellant has argued that as the mother of the appellant was seriously ill, therefore, the appellant remained busy in her look after and was thus unable to attend his duty; that the absence of the appellant from duty could not be termed as willful because he was busy in look after of his ailing mother; that the appellant had submitted an application for leave, however the same was not entertained; that neither any show-cause notice nor any charge sheet or statement of allegations was issued to the appellant and whole of the proceedings were conducted at his back; that the appellant has not been provided any opportunity of self defense or personal hearing and he was condemned unheard; that no regular inquiry was conducted in the matter and the appellant was awarded major penalty of removal from service; that the appellant has served the department for almost 23 years and in the given circumstances, the punishment awarded to the appellant is very harsh.
- 4. On the other hand, learned District Attorney for the respondents has contended that the appellant was in habit of remaining absence from duty without any sanctioned leave or permission of the competent Authority and previously too, he was dismissed from service on the allegations of absence from duty; that the appellant was issued show-cause notice as well as charge sheet and statement of allegations, however he did not even bother to appear before the inquiry officer; that in his departmental appeal, the appellant had not raised the plea of illness of his mother, therefore, the appellant could not legally raise such plea before this Tribunal; that the impugned orders were

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passed after observing all legal and codal formalities, therefore the same may be kept maintained and the appellant in hand may be dismissed with cost.

- 5. We have heard arguments of learned counsel for the parties and have perused the record.
- 6. The appellant was proceeded against departmentally on the allegations of his absence from duty with effect from 01.03.2017, who did not turn up for duty and was thus dismissed from service vide order dated 02.08.2018. Charge sheet as well as statement of allegations was personally served upon the appellant, however he did not bother to attend the inquiry proceedings. When the appellant was deliberately avoiding to join inquiry proceedings, the only option with the inquiry officer was to proceed against him ex-parte. The only justification raised by the appellant regarding his absence from duty was the illness of his mother, which plea was not at all taken by him in his departmental appeal. The appellant being a member of a disciplined force was required to had at least apply for availing leave but he opted to remain absent from duty without any sanctioned leave or permission of the competent Authority. Previously too, the appellant had been dismissed from service on the ground of absence from duty. appellant has remained absent from considerable long period without any sanctioned leave or permission of the competent Authority, which amounts to misconduct
- 7. While going through the record, we have observed that the appellant was enlisted as Constable on 24.01.1995 and was having a service of almost of 23 years at his credit at the time of his dismissal from service, which was later on later on converted into removal from service. Keeping in view the length of service rendered by the appellant, we are of the view that the penalty so awarded to him is quite harsh and safe administration of justice would justify the



modification of his penalty of removal from service into compulsory retirement from service.

8. Consequent upon the above discussion, the appeal in hand is partially allowed and the major penalty of removal from service so awarded to the appellant is converted into compulsory retirement with effect from 02.08.2018. The intervening period of his absence from duty may be treated as leave without pay for the purpose of bridging up the service gap of the appellant. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 20.07.2022

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

(KALIM ARSHAD KHAN)
CHAIRMAN
CAMP COURT ABBOTTABAD

<u>O'R D E R</u> 20.07.2022 Appellant alongwith his counsel present. Mr. Shamraiz Khan, ASI alongwith Mr. Noor Zaman Khattak, District Attorney for the respondents present. Arguments heard and record perused.

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Vide our detailed judgment of today, separately placed on file, the appeal in hand is partially allowed and the major penalty of removal from service so awarded to the appellant is converted into compulsory retirement with effect from 02.08.2018. The intervening period of his absence from duty may be treated as leave without pay for the purpose of bridging up the service gap of the appellant. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 20.07.2022

(Kalim Arshad Khan) Chairman

Camp Court Abbottabad

(Salah-Ud-Din) Member (Judicial) Camp Court Abbottabad Due to non-functional of the Tribunal, the case is

adjourned for the same on 19.05.2022

19.05.2022 Learned counsel for the appellant present. Syed Naseer Ud Din, Assistant Advocate General 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 16.06.2022 at camp court Abbottabad.

(Fareeha Paul) Member(E)

(Kalim Arshad Khan) Chairman Camp Court Abbottabad

16.06.2022

Appellant present through counsel.

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

Former made a request for adjournment in order to prepare the brief of the case. Case is adjourned. To come up for arguments on 20.07.2022 before D.B at Camp Court, Abbottabad.

(Fareeha Paul) Member (E)

Camp Court, A/Abad

(Rozina Rehman) Member (J) Camp Court, A/Abad 14.06.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 29.09.2021.

Reader

29.09.2021

Junior to counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG alongwith Shamraiz Khan, ASI for the respondents present.

Written reply as directed to be filed on previous date is still awaited. Respondents are directed to furnish reply/comments on next date positively If the respondents fail to submit the reply/comments within the stipulated time their right of submission of written reply shall be deemed as struck off. Case to come up on 16.11.2021 before S.B. at Camp court, Abbottabad

Chairman Camp Court, A/Abad

16.11.2021

Counsel for the appellant and Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG alongwith Shamraiz Khan, ASI (Legal) for the respondents present.

Representative of the respondents has furnished reply/comments which are placed on file. To come up for arguments on 15.03.2022 before the D.B at camp court, Abbottabad.

Chairman Camp Court, A/Abad IS.01.2021

Due to COVID-19, the case is adjourned for the same on 17.02.2021 before D.B.

READER

17.02.2021

Appellant present through counsel.

Noor Zaman Khattak learned District Attorney alongwith Shamrez Khan A.S.I for respondents present.

Written reply was not submitted. Representative of respondents requested for time to furnish reply/comments; granted. To come up for written reply/comments on 14.06.2021 before S.B at Camp Court, Abbottabad.

(Atiq ur Rehman Wazir) Member (E) Camp Court, A/Abad 23.10.2020

Counsel for appellant present. Preliminary arguments heard. File perused.

Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 19 days. Thereafter notices be issued to respondents for written reply/comments. To come up for written reply/comments on 18.01.2021 before S.B at Camp Court, Abbottabad.

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(Rozina Rehman) Member (J)

Carrip Court, A/Abad

Form- A

FORM OF ORDER SHEET

Court of	· · · · · · · · · · · · · · · · · · ·
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-	Case No	82 3/2020
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
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BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 8 > /2020

Shakeel Ahmed Ex-Constable No.509, Village Langra, P.O Havelian, Tehsil Havelian, District Abbottabad.

...APPELLANT

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

INDEX

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3.	Copy of dismissal order dated 02/08/2018	53	"B"
4.	Copy of departmental appeal and rejection order dated 08/07/2019	56-57	"C" & "D"
5.	Copy of order dated 06/01/2020	SB	"E"
6.	Copies of charge sheet, statement of allegations and application of the appellant dated 29/01/2020	59-62	: . "F"
7.	Wakalatnama	63	

...APPELLANT

Dated: $\frac{9}{2}$

Through

PAKHTUNKHWA PESHAWAR

Chyber Pakhtukuwa Service Tubenal

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10-20 04-02-2020

Service Appeal No. 872 /2020

Shakeel Ahmed Ex-Constable No.509, Village Langra, P.O Havelian, Tehsil Havelian, District Abbottabad.

...APPELLANT

VERSUS

- 1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2. Regional Police Officer, Hazara Region, Abbottabad.

SERVICE

CIRCUMSTANCES

3. District Police Officer, Abbottabad.

....RESPONDENTS

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FOR

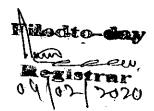
EFFECT THAT DECLARATION TO THE MOTHER OF APPELLANT IS THE SUFFERING FROM **MULTIFARIOUS** DISEASES AND THE APPELLANT APPLIED FOR LEAVE BUT THE RESPONDENTS DID NOT ALLOW THE , THE

WERE

CONTROL OF THE APPELLANT AS

SERVICE APPEAL UNDER SECTION 4 OF

TRIBUNAL ACT,



THEREFORE. BEING. APPELLANT COULD NOT SERVE DEPARTMENT W.E.F 01/03/2017 TO 08/02/2018, HENCE, RESPONDENT NO.4 DISMISSED THE APPELLANT FROM SERVICE ON 02/08/2018 WHICH RECEIVED BY THE APPELLANT ON 17/10/2018. THE IMPUGNED DISMISSAL ORDER DATED 02/08/2018 AND IMPUGNED ORDER DATED 08/07/2019 AND ORDER NO. S/169/20 DATED 06/01/2020 ARE ILLEGAL, WITHOUT FOLLOWING THE PRESCRIBED PROCEDURE AND THE SAME ARE LIABLE TO BE SET-ASIDE.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED DISMISSAL ORDER DATED 02/08/2018 AND REJECTION LETTER OF RESPONDENT NO.2 & 1 DATED 08/07/2019 AND 06/01/2020 ARE LIABLE TO BE SET-ASIDE. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEM APPROPRIATE IN THE CIRCUMSTANCES OF

THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth:-

The facts forming the background of service appeal are arrayed as under;-

- 1. That the appellant got appointment as Constable on 24/01/1995 and served the department for 23 years.
- 2. That mother of the appellant is suffering from multifarious diseases. Besides, the mother of the appellant met a serious accident which resulted into imputation of her right leg. Therefore, the appellant was to look after his ailing mother. As a result, he applied for leave to the respondent No.3 but the application of the appellant was not entertained which is available in the record of respondent No.3. Copy of medical documents of the mother of the appellant are attached as Annexure "A".

- 3. That respondent No. 3 without proper inquiry and considering the genuine plea of the appellant dismissed him from service vide order dated 02/08/2018 which was received by the appellant on 17/10/2018. Copy of dismissal order dated 02/08/2018 is attached as Annexure "B".
- 4. That the appellant filed departmental appeal against the impugned dismissal order on 31/10/2018 which was rejected by respondent No.3 on 08/07/2019. Copy of departmental appeal and rejection order dated 08/07/2019 are attached as Annexure "C" & "D".
- 5. That the respondent No.1 after partially accepting the review petition of the appellant converted the dismissal order into removal from service vide order dated 06/01/2020. Copy of order dated 06/01/2020 is attached as Annexure "E".
- 6. That the appellant applied to respondent No.3 for provision of attested copies of service documents/ records for the purposes of filing of service appeal before this Honourable tribunal vide application dated 29/01/2020 but the respondent No.3 only

provided only copy of charge sheet and statement of allegation. Copies of charge sheet, statement of allegations and application of the appellant dated 29/01/2020 are attached as Annexure "F".

7. That the instant service appeal is filed inter-alia on the following grounds;-

GROUNDS;-

- a) That the impugned removal from service order dated 02/08/2018 and its impugned rejection orders dated 08/07/2019 and 06/01/2020 are liable to be set-aside because no prescribed procedure as per law has been adopted by the competent authorities.
- Department is near about 23 years and the absence of the appellant was not willful but beyond his control as a human being.

 Respondents' department was supposed to grant leave for the purposes of looking after of his ailing mother. It is further submitted that respondents' department did not

conduct proper inquiry and in a cursory manner dismissed the appellant from service which was converted into removal from service by respondent vide order dated 06/01/2020.

- c) That it is also submitted that though the appellant was called by the authority for personal hearing but no opportunity of personal hearing was provided by any authority. Therefore, dismissal from service order dated 02/08/2018 and conversion of dismissal order into removal from service order dated 06/01/2020 are liable to be setaside.
- d) That the appellant has been dismissed from service without following the prescribed procedure. Therefore, dismissal of the appellant is liable to be set-aside.
- e) That the appellant caused no loss to the public exchequer and did not receive salary for the period of absence. Hence, department was suppose to either reinstate the appellant

in service are convert the punishment into compulsory retirement keeping in view 23 years service of the appellant.

- f) That the appellant has no source of income and he is unable to arrange bread and butter for his ailing mother and dependent family members.
- hands while granting relief to the aggrieved appellant as the appellant committed no offence or misconduct because the circumstances were beyond the control of the appellant as a human being.
- h) That there is no other prompt, efficacious remedy, available to the appellant except the instant appeal.

It is, therefore, humbly prayed that on acceptance of the instant service appeal, the impugned dismissal order dated 02/08/2018 and rejection letter of respondent

No.2 & 1 dated 08/07/2019 and 06/01/2020 are liable to be set-aside. Any other relief which this Honourable tribunal deem appropriate in the circumstances of the case may also be granted to the appellant.

.APPELLANT

Through

Dated: **12** /20

Muhammad Acstrad Khan Tanoli)

Advocate filip PC3 util Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing service appeal are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable tribunal.

...APPELLANT

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

	Service Appeal N	O/2020
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Shakeel Ahmed Ex-Constable No.509,	Village Langra, P	.O Havelian, Tehsil
Havelian, District Abbottabad.		;
		APPELLANT

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others.

....RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Shakeel Ahmed Ex-Constable No.509, Village Langra, P.O Havelian, Tehsil Havelian, District Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

3/10/20

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LABORATORY REPORT

Hospital Consultants Surgeon Dr. Inayatullah

M.B.B.S., M.C.P.S., F.A.C.S. Ex. Senior Surgical Specialist D.H.Q. Hospite! Haripur Incharge Allama Iqbal Rospital Haripur

Dr. Adnan Tahir 🚉 MBBS RMP PC&R Cardiac Surgery PIMS Islamabad

Prof. Dr. Modeod ul Manan MBBS (Posh) M.Phil (Haemotology) Ex-Prof. of Pathology AMC Abbotiabac Prof. of Pathology VMC Abbottebad

Dr. M. Akram Khan MABS FCPS (Medicine) Medical Specialist

Dr. Akhtar Zaman MBBS FCPS Orthopedic Surgeron

Dr. Saqib Khalil MDBS 'AS Neuro Surgeon (Gold M∉dalist)

Dr. Gehar Ali Yousafzai MSBS RIMP (194 Cliff & Public Heath Specialist

Dr. Saba Nasir MBB3 FCF5 MRCOG4 Gynazrologist

Dr. Tonveer Khan IGRAS, RMP, FCPS (CC)

Dr. Syed Danish Mehmood MBCS FCPS Urthopedic Surgann

Acc ID : 01-184348

Patient's Name: IFTIKHAR BEGUM

: DR. MOHAMMAD AKRAM KHAN

Reg. Date : 06-03-2018 Lab No.

Panel

: 184347

Age / Sex

Printing Date

60 Years / Female

Allama Iqbal Hospital

06-03-2018

Haematology Parameters

Referred by

MCV

MCH

MCHC

Platelet Count

Neutrophils

Lymphocytes

Test Name Result T.L.C 7.5 Red Cell Count 2.90 Haemoglobin 8.2 PCV / HCT 24.3

83.9

28.2

33.7

273

Arshad Khan Tano Advocate High Court Office No 33 Adjacent to

2.90

8.2

HRG6300D

!!EMATOLOGY REPORT

TIME:2018-03-06 19:3 SAMP: Venous RCRD: DOCT: CHCK:

x10*12/L 3.56 g/dL 11.6

NO :180306347

Diff. Leuc. Count (DLC) Results Limit 62.4 7.5 BC x10'9/L 4.0 : .0 30.8 LYM% 30.8 % 20.0--40.0 MID% 6.8 % 1.0--15.0

HGB

TE:

NEUT% 62.4 0% 50.0- 70.0 Note:-Test is performed on Fully Automatic LYM# x10*9/L 2.3 0.6 - 4.1It is a State of the Art Machine . . . MID# x10*9/L 0.1--1.8 0.5 2.6 7.8 x10*9/L NEUT# 4.7 **RBC**

Chemical Parameters

HCT 24.3 36.0 45. $\gamma_{ij,j,ij,j,ij,j,j,j,j,j,j}^{(i)}$ Test Name MCV fL. Result 83.9 MCH 28.2 26.0--3.. рŗ Serum Electrolytes **MCHC** 33.7 g/dL 32 0.-3/ Serum Sodium 37,8 138.3 RDW-SD 42.7 fL RDW-CV Serum Potassium 14.9 2.68 Serum Chloride 91.5 x10*9.1 PLT 273 1391 436 **APV** 9.8 fL 7.4 10 Renal Function Tests PDW 13.1 0. 1:1: PCT 1.26 a_0 Serum Urea 15 $P \mathrel{{}^{\perp}\!\!\!{\perp}} \chi \mathrel{{}^{\perp}\!\!\!{\perp}} R$ 14.0 Serum Creatinine 1.0 BLOOK.

THIS IS ... COMPUTER GENERATED REPORT, DULY VERIFIED BY TECHNOLOGIST II
THERE IS ANY DISCREPANCY IN THE RESULT, PLEASE INFORM WITHIN 24 HOURS
NOT VALID FOR COURT.



Dr. Muhammad Akram Khan

MBBS, FCPS (Medicine) Medical Specialist PMDC No. 13538-N

P-26

Name: FTIKATOR BEGINS

Ago: Date 06/03/2018

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ALLAMA IQBAL HOSPITAL

Shakar Shah Road, Near Fawara Masjid Haripur Ph. 0995-627555/0342-9456014



Dr. Syed Danish Wehmood

MBBS, FCPS (Ortho & Trauma)
ORTHOPAEDIC & TRAUMA SURGEON
Member international congress for joint Reconstruction (USA)
Member SICOT (Belgium)
Member Asia Pacific Arthroscopy Society

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P-27

Mail Administration of the state of the stat

S. Electrolyte ZES'J

Med Spit

Muhammad Are Han Court & Office No: 33 Adjacent to Distt Bar Abbottabad

For Appointment: 0336-0581198, 0334-9494305

www.orthopaedic.pk Email: punjtani@hotmail.com facebook.com/bone5joint

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Shakar Shah Road, Near Fawara Masjid Haripur Ph: 0995-627555



ce in Laboratory testing of the College of American Pathologists since 1997

HISTOPATHOLOGIST & **CHIEF PATHOLOGIST**

HISTOPATHOLOGIST Dr. Aamer Mehmood

Dr. Naseer Ahmad MBBS, FCAP (USA), FASCP (USA)

Acc. No:

Patient Name:

Doctor Name:

XLG-07250

NIRM

Patient ID:

BR-D-84069

FINAL REPORT

Iftikhar Begum

Specimen Received @: Main Lab 21/02/2018 12:36 PM

Female Sex:

<u>Age:</u> 60Y

MBBS, FCPS - Histo (Pak) ARC Path - Histo (U.K.) MICROBIOLOGIST

Prof. Dr. Shagufta Hussain

MBBS, M.Phil (Micro)

Test Name

Reference Range

HEMATOLOGIST

Dr. Umar Zahur MBGS, FCPS (Heina)

Chemistry

21/02/18 19/02/18

17/02/18

136 - 145

IMMUNOLOGIST Dr. Asma Kazi

MBBS, MA (Immunelogy) USA SENIOR PATHOLOGISTS

Dr. Tabasunı İmran M.Phil, Ph. O

Dr. Asim Saeed MBBS, IAPEIL (Micro)

Dr. Nazia Siddique MBBS, M.Phil (Hema)

> ATHOLOGISTS

Dr. Nazia Khan MOBS, FCPS (Pt.1)

Dr. Shahbaz Iqbal ₩RBS, FCPS (Pt.1)

Dr. Numreen Nazar MBBS, FCPS (Pt.1)

Dr. Moniba Zafar MB8S, FCPS (Histo)

Dr. Hina Bilal MB85. M.Phil (Hema) Result

Serum Electrolytes

Sodium Potassium Chloride

137 mmol/L mmol/L mmol/L

138 mmol/L * 2.4 mmol/L 92 mmol/L

127 mmol/L * 2.0 mmol/L³ 81 mmol/L

3.5 - 5.3 90 - 110

Allslid

Abvocate High Court Office No 33 Adjacent to Distt 3ar Abbottabad



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MAIN LAB ISLAMABAD Tel: 051-831 1000 CSR: 051-831 1006

LAHORE LAB Tel: 042-5521 9184

Electronically signed & verified by Dr. Tabassum Imran Report Date: February 21, 2018 1:36 pm Init: Saeed Ahmed Bh

Specimen Received @Lab 21/02/2018 12:37PM

Sample received from out side.

21/02/2018 1:17PM Tests Performed @Lab:

Page 1 of 1

Pathologist



MAIN LAB: 110 Fazal-ul-Haq Road, Blue Area, Islamabad. Tel: 051 831 1000 | www.excel-labs.com

Pakistan Institute of Medical Sciences Department of Haematology

Patient Control #: P-02/18-42193

Specimen: EDTA (WB)

Patient Name: IFTIKHAR BEGUM

Para Para

HITEKHAR K

1-321 1165

Receipt #:

Female:

Sample date 1. Feb 21 2018 3:53PM

OPD: Emergency OPD #: 303/18/02/20536

Order#:

Result

<u>56.6</u>

17.9

02/18-24032

Lab # : "

Normal Range

29 - 46 fL

11 - 14 %

02/18-24032

62/18-24032

lest Name

e.: 545.

WBC.

HOTEL Room

MCDC ...

Platelet Count

RBC linion:

MCV 1 METHORNEL

UV M36. 111119%

包括更订% $\hookrightarrow MH$ MXD# BEGIT#

模DW-SD

ROW-CV

	Complete Blood Picture	
•		
	7500	4000 - 11000 /µL
	<u>3.41</u>	3.5 - 5.6 million/µL
	<u>9.6</u>	11 - 18 g/dL
	<u>29.2</u>	32 - 53 % Frenh
	85.6	79 - 101 fL
	28.2	26 - 35 pg 🤨 📑 🐈
	32.9	31 - 37 g/dl. 62/18
	275000	140000 - 400000 /μL
	29.3	12 - 50 %
	8.2	0 - 7 %
	62.5	37 - 75 %
	2.2	1 - 3.5 /μL
	0.6	0-8/μL
	4.7	2 - 7.5 /μL

Muhammay Arshad Khan Tanoli Advocate High Court 1

Allsha

Office No. 33 Adjacent to Distr. Bor Abbottabad

"himlogist Comments

Picase correlate with clinical data and other investigations. Please Discuss.

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Professor

YMS.

Resporting date

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21/02/2018 06:25:49 PM

<u>P-02/18-42193</u> آپ کاپیشنٹ کنٹرول نمبر ہے۔ یہ نمبر سنجال کررکھیں اور ہمیشہ پمز جبیتال آنے براین

LMIS , A CRM Product

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HISTOPATHOLOGIST & CHIEF PATHOLOGIST

Dr. Naseer Ahmad MBBS, FCAP (USA), .

FASCP (USA) HISTOPATHOLOGIST

Dr. Aamer Mehmood MBBS, FCPS - Histo (Pak)

ARC Path - Histo (U.K.) MICROBIOLOGIST

Acc. No:

XLG-06469

Patient Name:

lftikhar Begum

Doctor Name:

NIRM

Specimen Received @: Main Lab 19/02/2018 12:23 PM

Prof. Dr. Shagufta Hussain MBBS, M.Phil (Micro)

HEMATOLOGIST Dr. Umar Zahur

MRBS_FCPS (Hema) IMMUNOLOGIST Dr. Asma Kazi

MBBS, MA Gramunologiy) USA SENIOR PATHOLOGISTS

Dr. Tahasum Imran M. fay, Fh. D

Dr. Asim Saeed MGSS, M.Phil (Wittro)

Dr. Nazia Siddique MOBE Mighil (Flenia)

PATHOLOGISTS

Dr. Nazia Khan MRDS, FCPS (PL1)

Dr. Shahbaz Iqbal M685, ECPS (PL1)

Dr. Numreen Nazar MBBS, FCPS (Pt.1)

Dr. Moniba Zafar MBBS, FCPS (Hale)

Dr. Hina Bital MBBS, M.Phil (Henra)

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MAIN LAB ISLAMABAD Tei: 051-631 1000 CSR: 051-831 1006

LAHORE LAB Tel: 042-3521 9184 P-30

FINAL REPORT

Patient ID:

BR-D-84069

Sex:

Female Age: 60Y

Reference Range

Test Name

Result

Chemistry

Serum Electrolytes

19/02/18 138 mmol/L * 2.4 mmol/L 17/02/18 127 mmol/L * 2.0 mmol/L

137 mmol/L 3.1 mmol/L

06/02/18

136 - 145 3.5 - 5.3

PLEASE DISCUSS THIS REPORT WITH YOUR TREATING PHYSICIAN URGENTLY.

Chloride

Sodium

Potassium

92 mmol/L

81 mmol/L

92 mmol/L

90 - 110

Allosla Muhammad Arshad Khan Tanoli Advocate High Court Office No: 33 Adjacent 15

Siell

* Result has been rechecked.

Sample received from out side.

Electronically signed & verified by Dr. Asma Kazi (PMDC#16973-S)

Report Date: February 19, 2018 1:03 pm Init:

Saeed Ahmed Bhatti

Specimen Received @Lab 19/02/2018 12:24PM

Tests Performed @Lab:

19/02/2018 12:56PM

Page 1 of 1



MAIN LAB: 110 Fazal-ul-Flag Road, Blue Area, Islamabad. Tel: 051 831 1000 | www.excel-labs.com

Pakistan Institute of Medical Sciences

Department of Chemical Pathology



Receipt # :

Patient Name:

Patient Control #: P-02/18-42193 IFTIKHAR BEGUM

Age:

60 Yr(s)

Sex:

Female

Sample date :-

Feb 18 2018 12:44AM

OPD: Emergency OPD #: 303/18/02/16499

Specimen:

Serum

Order#:

02/18-19587

Lab#:

A -		Conve	entional System	System	International (SI)
Yesi Name	;	Result	Normal Range	Result	Normal Range
CRIS CK - MB		35 16 258	60 - 167 U/L 60 - 80 U/L 230 - 460 U/L	35 16 258	60 - 167 U/L 20 - 460 U/L

Pothologist Comments

Please correlate with clinical data and other investigations. Please Discuss.

Sample is available for seven days. Please call undersigned for result re-check if required.

Malik Malik

Pathologist ----@bc.051-9071 - Ex-2268

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建筑线点

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CK - ME Wildrighting date 18/02/2018 04:42:19 AM

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HISTOPATHOLOGIST & CHIEF PATHOLOGIST

Dr. Naseer Ahmad MBBS, FCAP (USA), FASCP (USA)

HISTOPATHOLOGIST

Dr. Aamer Mehmood MBBS, FCPS - Histo (Pak)

ARC Path - Histo (U.K.)

MICROBIOLOGIST Prof. Dr. Shagufta Hussain

MBRS, M.Phil (Micro) HEMATOLOGIST

Dr. Umar Zahur MBBS, FCPS (Hema)

IMMUNOLOGIST Dr. Asma Kazi MBBS, MA (immunology) USA

SENIOR PATHOLOGISTS

Dr. Tabasum Imran

Dr. Asim Saeed MBBS, M.Phil (Micro)

Dr. Nazia Siddique MBBS, M.Phil (Hema)

PATHOLOGISTS

Dr. Nazia Khan MBES, FCPS (PL1)

Dr. Shahbaz Iqbal

Dr. Numreen Nazar MBSS, FCPS (PL1)

Dr. Moniba Zafar MBBS, FCPS (Histo)

Dr. Hina Bilal MBBS, M.Phil (Hema)

FINAL REPORT

Patient ID:

BR-D-84069

Reference Range

90 - 110

3.5 - 5.3

Sex: Female Age: 60Y

Specimen Received @: Main Lab 06/02/2018 03:37 PM

XLG-02430

NIRM

Iftikhar Begum

Test Name Result

Chemistry

Acc. No:

Patient Name:

Doctor Name:

Serum Electrolytes

36/02/18 Chloride 92 mmo!/L

Potassium Please correlate clinically.

Sodium

3.1 nimo!/L

137 mmol/L 136 - 145

Allester

Disti Bar Abbottabad

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MAIN LAB ISLAMABAD Tel: 051-831 1000 CSR: 051-831 1006

LAHORE LAB Tel: 042-3521 9184 Sample received from out side.

Rectronically signed & verified by Dr. Moniba Zafer (PMDC#42972-P)

Report Date: February 06, 2018 4:14 pm in t; Saeed Ahrned Bhatti

Specimen Received @Lab 06/02/2018 3:38PM

Tests Performed @Lab; 06/02/2018 4:09PM

Page 1 of 1

Pathologist

MAIN LAB: 110 Fazal-ul-Haq Road, Blue Area, Islamabad. Tel: 051 831 1000 | www.excel-labs.com



Main Lab, ISB

of Américan Pathologis

HISTOPATHOLOGIST & CHIEF PATHOLOGIST

Dr. Naseer Ahmad MBBS, FCAP (USA), FASCP (USA)

HISTOPATHOLOGIST

MBBS, FCPS - Histo (Pak)

Dr. Aamer Mehmood ARC Path - Histo (U.K.)

Patient Name:

Iftikhar Begum

XLG-01537

Doctor Name:

Self

MICROBIOLOGIST Prof. Dr. Shagufta Hussain MBBS, M.Phil (Micro)

HEMATOLOGIST

Dr. Umar Zahur MBBS, FCPS (Hema)

IMMUNOLOGIST

Dr. Asma Kazi MBBS, MA (Immunology) USA

SENIOR PATHOLOGISTS

Dr. Tabasum Imran M.Phil, Ph. D

Dr. Asim Saeed MBBS, M.Phii (Micro)

Dr. Nazia Siddique

MBBS, M.Phil (Hema)

PATHOLOGISTS Dr. Nazia Khan

MBBS, FCPS (Pt.1)

Dr. Shahbaz Iqbal

Dr. Numreen Nazar MBBS, FCPS (Pt.1)

Dr. Moniba Zafar MBBS, FCPS (Histo)

Dr. Hina Bilal MBBS, M.Phil (Hema)

MBBS, FCPS (Pt.1)

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MAIN LAB ISLAMABAD Tel: 051-831 1000 CSR: 051-831 1006

LAHORE LAB Tel: 042-3521 9184 Acc. No:

Specimen Received @: Main Lab 02/02/2018 08:46 PM

Test Name

Chemistry

C.R.P.

Glucose (Random)

<u>Result</u>

02/02/18 125 mg/dL

02/02/18

92.9 mg/L

FINAL REPORT

Patient ID: BR-D-84069

Sex: Female Age: 60Y

Reference Range

80 - 150 Adults 70 - 130 Children Infants:

50 - 100 Upto 4 days

< 5.0 Negative 5.0 & above Positive

Alleslod

Office No. 33 Adjacent to Distt 3ar Abbottabad

Sample received from out side.

Electronically signed & verified by Dr. Shahbaz Iqbal (PMDC#2181-AJK)

Qalab Abbas 💥 🗸 Report Date: February 02, 2018 8:40 pm Init;

Specimen Received @Lab 02/02/2018 7:50PM

Tests Performed @Lab: 02/02/2018 8:30PM

Page 1 of 2

Pathologist



MAIN LAB: 110 Fazal-ul-Haq Road, Blue Area, Islamabad. Tel: 051 831 1000 | www.excel-labs.com

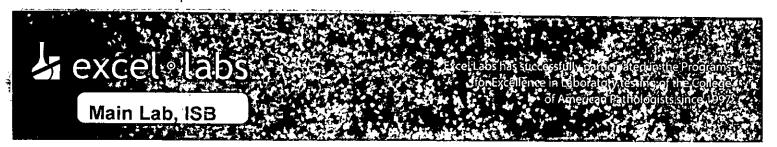
Patient ID:

Sex: Female

FINAL REPORT

BR-D-84069

Age: 60Y



HISTOPATHOLOGIST & **CHIEF PATHOLOGIST**

Dr. Naseer Ahmad MBBS, FCAP (USA), FASCP (USA)

HISTOPATHOLOGIST

Dr. Aamer Mehmood MBBS, FCPS - Histo (Pak) ARC Path - Histo (U.K.)

MICROBIOLOGIST

Prof. Dr. Shagufta Hussain MBBS, M.Phil (Micro)

HEMATOLOGIST

Dr. Umar Zahur MBBS, FCPS (Hema)

IMMUNOLOGIST

Dr. Asma Kazi MBBS, MA (Immunology) USA

SENIOR PATHOLOGISTS

Dr. Tabasum Imran M.Phil, Ph. D

Dr. Asim Saeed MBBS, M.Phil (Micro)

Dr. Nazia Siddique MBBS, M.Phil (Hema)

PATHOLOGISTS

Dr. Nazia Khan M8BS, FCPS (Pt.1)

Dr. Shahbaz Iqbal M8BS, FCPS (Pt.1)

Dr. Numreen Nazar MBBS, FCPS (Pt.1)

Dr. Moniba Zafar MBBS, FCPS (Histo)

Dr. Hina Bilal

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MAIN LAB ISLAMABAD Tel: 051-831 1000 CSR: 051-831 1006

LAHORE LAB Tel: 042-3521 9184

XLG-01537 Acc. No:

Patient Name: Iftikhar Begum

Doctor Name: Self

, Specimen Received @: Main Lab 02/02/2018 08:46 PM

Test Name Reference Range Hematology **Biood Complete Picture WBC** Count 10,660 /mm3 4,000 - 10,000 **RBC Count** 3.23 inil/mni3 4.5 - 6.0 8.6 g/dL._____ Hemoglobin 12 - 16 Hematocrit 28 9% 40 - 50 MCV 86 fL 82 - 98 MCH 27 27 - 31 pg **MCHC** 31 g/dL 32 - 36 RDW-CV, 17 % 11 - 16 **Platelets** 351,000 /mm3 140,000 - 450,000 **Differential Count** Neutrophils 63 % 40 - 75 **Lymphocytes** 29 % 15 - 45 Monocytes 6 % 2 - 12 Eosinophils % 2 - 6 Basophils O % 0 - 1

Sample received from out side.

Pathologist Comments:

Bands

Slight leukocytosis. Anomia with RBC morphology showing (+) anisocytosis. Adequate platelets present. Please correlate clinically.

0

Office No 33 Adjacent to Disti Bar Abbottabad

0-3

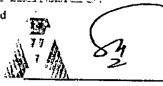
Electronically signed & verified by Dr. Shahinaz Iqhal (PMDC#2181-AJK)

Report Date: February 02, 2018 9:20 pm Init: Abdul Wadood

Specimen Received @Lab: 02/02/2018 8:46PM

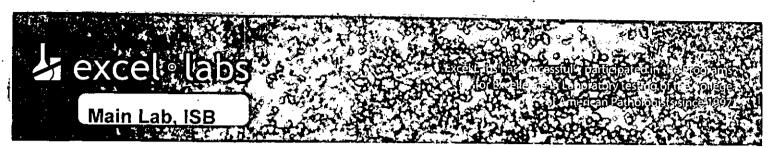
Tesis Performed @Lab: 02/02/2018 8:52PM

Page 1 of 1



Pathologist





HISTOPATHOLOGIST & CHIEF PATHOLOGIST

Dr. Naseer Ahmad MBBS, FCAP (USA), FASCP (USA)

Acc. No:

XLG-01537

BR-D-84069 Patient ID:

HISTOPATHOLOGIST Dr. Aamer Mehmood MBBS, FCPS - Histo (Pak) ARC Path - Histo (U.K.)

Patient Name:

Iftikhar Begum

Sex: Female Age: 60Y

Doctor Name:

Self

Specimen Received @: Main Lab 02/02/2018 08:46 PM

MICROBIOLOGIST Prof. Dr. Shagufta Hussain

MBBS, M.Phil (Micro)

Test Name

Result

Reference Range

FINAL REPORT

HEMATOLOGIST

Dr. Umar Zahur MBBS, FCPS (Hema)

IMMUNOLOGIST

Special Chemistry

02/02/18

Dr. Asma Kazi MBBS, MA (immunology) USA

SENIOR PATHOLOGISTS

Dr. Tabasum Imran

Glycosylated Hb (HbA1C)

5.3 %

4.0 - 6.0 % < 7.0 % Goal for Diabetic

Please discuss this report with your treating physician for clinical correlation.

MB8S, M.Phil (Hema) PATHOLOGISTS

M.Phil, Ph. D Dr. Asim Saeed MBBS, M.Phil (Micro) Dr. Nazia Siddique

Dr. Nazia Khan

MBBS, FCPS (Pt.1) Dr. Shahbaz Iqbal

MBBS, FCPS (Pt.1) Dr. Numreen Nazar

MBBS, FCPS (Pt.1) Dr. Moniba Zafar

MBBS, FCPS (Histo) Dr. Hina Bilal MBBS, M.Phil (Hema)

Allested Advocate High Court 1

Office No 33 Adjacent to Distt. Bar Abbottabad

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Sample received from out side.



CERTIFIED

MAIN LAB ISLAMABAD Tel: 051-831 1000 CSR: 051-831 1006

LAHORE LAB Tel: 042-3521 9184 Electronically signed & verified by Dr. Shahbaz Iqbal (PMDC#2181 AJIQ) Qalab Abbas

Report Date: February 02, 2018 9:24 pm Init:

Specimen Received @Lab 02/02/2018 8:46PM Tests Performed @Lab: 02/02/2018 9:25PM

Page 2 of 2

Pathologist



MAIN LAB: 110 Fazal-ul-Haq Road, Blue Area, Islamabad. Tel: 051 831 1000 | www.excel-labs.com



PAKISTAN INSTITUTE OF MEDICAL SCIENCES ISLAMABAD

Islamabad Hospital

Rs. 0

OPD Visit # = 3 OPD# : 303/18/02/21612 PCN. : P-02/18-42193 OPD Name : Emergency : 22/02/2018 02:28:23PM Date : JALIL AHMED Patient Name: IFTIKHAR BEGUM W/O Age : 60 year(s) 0 month(s) 5 day(s) old. Visit Unit: Weight : Female Sex Address Payment Type: General (EAC) : ISLAMABAD City CNIC یہ P-02/18-42193 آپ کاپیشنٹ تمنٹرول نمبر ہے۔ بیسنبیال کررکھیں اور ہمیشہ بموسیتال آ نے براییے ساتھ لا کیں۔ 505 نوث _ ڈاکٹر سے مشورے کے بعد میں تال میں موجورا دویات حاصل کرنے کیلئے فار جس سے رابط کریں ۔ Re-Amend by: zeeshan hayat Entry Operator: zeeshan hayat Amend by: Complaint / Diagnosis: Treatment Allosted lemp, 100, It by ampufation alone of 15 Feb. 218 for NIRM Hospital No Vormity- Idy boch New rettled. No Astre Mo Vant To Fores 1. Alo Por de chofe from Ward witer No dehydsoffen a cs 1815 In Offsias zone 19 In AFD

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The c'he ignite than lappole line. Geles , egel - vonil, seuled non O air entry, : falit encins & arientes. E. Cof Feguross. Ashmen - ly wi afsive. cof Essindong ut-9.1.88 de. Syp. Mucaine 2+2+2. Back to NIRM Allesteld An in Mil Sine



ारकोर्ति । ५ कारण र पुरसादा के हिंदू एतिया विश्वकृत्य रूप an mer of patesting of the Confequ की केन प्राप्त को है। पूर्व के किस्सान के निर्माद के अधिक

FINAL REPORT

HISTOPATHOLOGIST & CHIEF PATHOLOGIST Dr. Naseer Ahmad MBBS, TCAP (USA), FASCE (USA)

Acc. No:

XLG-05930

Patient ID:

BR-D-84069

HISTOPATHOLOGIST Dr. Aamer Mehmood

MDBS, FCPS - Disto (Pal.) ARC N. (i) Histo (U.K.)

Iftikhar Begum

Patient Name: **Doctor Name:**

NIRM

Sex: Female Age: 60Y

Specimen Received @: Main Lab 17/02/2018 11.06 AM MICROBIOLOGIST Prof. Dr. Shagufta Hussain

MBBS, M.Phil (Micro)

Test Name

Chemistry

Reference Range

HEMATOLOGIST Dr. Umar Zahur

MBBS, FCPS (Hemo)

Serum Electrolytes

02/02/18

IMMUNOLOGIST

Dr. Asma Kazi

17/02/18

136 - 145

MBBS, MA (tramunology) USA

Sodium Potassium

3.1 nin.bl/L

3.5 - 5.3

SENIOR PATHOLOGISTS

Dr. Tabasum Imran APhil 2h O

Dr. Asim Saeed

MBBS, Michill (weero)

Dr. Nazia Siddique MBBS, M Phil (Hema)

PATHOLOGISTS Dr. Nazia Khan

MCDS FCPS (Pt.1)

Dr. Shahbaz Iqbal MEBS, FCP5 (PL1) Dr. Numreen Nazar

MBBS, FCPS (Pt.1) Dr. Moniba Zafar

MBBS, FCPS (Histo) Dr. Hina Bilal MIDBS, M.Phil (Hema) Result

137 mmo‼L 127 mmol/L

* 2.0 / inmol/L

PLEASE DISCUSS THIS REPORT WITH YOUR TREATING PHYSICIAN URGENTLY.

Chloride

81 mmol/L

92 mmol/L

90 - 110

Alleha

<u> Luhammad Arshad</u>

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CSR: 051-831 1006

* Result has been rechocked.

Sample received from out side.

Electronically signed & verified by Dr. Asma Kazi (PMDC#16973-S)

Report Date: February 17, 2018 12:04 pm Init:

Specimen Received @Lab 17/02/2018 11:08AM

Tests Performed @Lab: 17/02/2018 12:00PM

Page 1 of 1

Saeed Ahmed Bhatti

Pathologist

LAHORE LAB Tel: 042-3521 9184

MAIN LAB: 110 Fazal-ul-Haq Road, Blue Area, Islamhbad. Tel: 051 831 1000 | www.excel-labs.com

PAKISTAN INSTITUTE **Rs.** 0 **PCN** OPD# : 303/18/02/20536 🖁 OPD Visit #= : P-02/18-42193 OPD Name : Emergency Date : 21/02/2018 12:54:29PIA Patient Name: IFTIKHAR BEGUM W/O : JALIL AHMED Age : 60 year(s) 0 month(s) 4 day(s) old. Visit Unit: Weight Sex : Female Address Payment Type: General (EAC) City : ISLAMABAD CNIC يد 192/18-42193 آپ كايتك كنفرول أبرب- سينجال كر رهين اور بميشه بمومينتال آخ برايخ ساتها لأكين-352 نوٹ _ داکٹر سے مطورے کے ابتد سیتال ہیں موجودادویات عاصل کرنے کیلئے فارسی سے رابط کریں ۔ Entry Operator: zeeshan hayat Amend by: Re-Amend by: Complaint / Diagnosis: Treatment MTNO 1040 BP-14190 Rettle 130 BSN 284mph prosonting conflet of unearling-

Printed on: 21/02/2018 12:54:32PM

Mihami Tanoli Court III

Sto hard ones 3 21-2-18 61/Median P.40 consult 2 T2 Dono HIND H/o (H) les auputation. 61/ Sussey 6 september 7519 78 917 A. F (polytrama) Reford from Nella. 407=15/15 IN Audistant smithy slu film Jeon L A Hypoklewa Pt: NPO. RTH Least Ble de all by med as 81-152 400 Ly Ampatela 020; 67/ non tack. y. personeret 4 /cg: P/L 1000 CL I/vx St-1 vonnty (2) W. W. courtype +21ccl -Tij: Offenozele Your Ifux &. disher D N. 1, root ij: (grante Thise. 172 rolliena de Gordon tendry of by Roberts W. Horpi. Jes WILL FOR Gasternanterlas 7 Med world (2) What the 13/1 40 PM to ever the persent 16 Norwervendrun GASTRO is needed, by gestro NO 76 5. Then refler the pt DN SEPARATE back to HIRPAM Mested PAPER



PAKISTAN INSTITUTE OF MEDICAL SCIENCES ISLAMABAD Islamabad Hospital **PCN** : P-02/18-42193 OPD# : 303/18/02/16499 OPD Visit #= **OPD** Name : Emergency Date : 17/02/2018 12:57:16PM JAUIL AHMED Patient Name: IFTIKHAR BEGUM : 60 year(s) 0 month(s) 0 day(s) old. Visit Unit Weight Sex : Female Address Payment Type: General (EAC) City : ISLAMABAD CNIC Phone یہ P-02/18-42193 آپ کلیٹنٹ کنٹرول نبر ہے۔ بیسنبال کررتھیں اور میشہ پر میتال آنے پرایین ساتھ لائیں۔ 438 نوث _ داکٹر سے متورے کے بعد میتال بیل موجودا دوبات حاصل کرنے کیلیے فارسی سے رابط کریں ۔ Entry Operator: zeeshan hayat Re-Amend by: Complaint / Diagnosis: Treatment SIE Gon Fram ?

Below kuse aupotation done 2100/16 2 days back. - Call from NIRM hospital

No active complaints.

Yend to us for exectrolyte correction.

Printed on: 17/02/2018 12:57:16PM

Disti Bar Abbottabad

9. melun Rym Charles Chandley K gry Druntersky New Lines 3-8 Mrzediatro f-42 referred bruke to NIRM No-peners raeg Ampulacies Dong 20 days back Dmo /HIMD Mon Course for netRM for J-K 22-6 Rho 12-02-1.8 Man 16,3-8 Good Brent aus Eypland ponen fly. ad charges and from Conjunt of orginal Photos Turere mus & suffrie 4- Vs ClemB conling

Dr. Faisal Magsood Qureshi MBBS, (Pak) RMP (Pak) General Surgon & Family Physician ايم لي لي ايس (ياك) آردايم لي (ياك) Ex. Medial Officer M.O.H Maldives جزل موحن ايز فيلى فزيش Ex. Senior Medical Officer M.O.H Seychelles مائِق میڈیکل آفیسرائی اورای (مالدیپ) سابق مینئرمیڈیکل آفیسرائی اورای (سیفلو) M.D Qureshi Health Care PMDC # 16701-N ایم فی: قریشی میلته کیئر Name: 12thlu Baifur Age: 617 Sex 9 Date 28/5/18. Address 10) Powas 1/2 state
10j-00-cef y is swall
pledar. 1 of Floggl word in asonti. Temp:..... / つン / B.P: 120/90 Le ge Carglide 600) P- com 20 7 - Sup. DB. Plex investigation Req: Blood CP CRP CIR Use outin. الثراساؤنڈ کے سکولت موجود کے الطنم 0313-1546041 سول هينتال روڏ حويليا ب

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Paugmin 9

All



A.H CLINICAL LABORATORY

ACCURACY & QUALITY ASSURED

AL YOUSAF MEDICAL CENTER HAVELIAN

Diagnostic & Specialized Pathology, Services I.

Name: IfthakarBegum Age: Sex: Male |
Specimen: Urine. Ref by:Dr Faisal Qureshi Date: 28-05-2018

	Urine R/E	
Pregnancy Test		
Colour	Yellow	
P.H.	Acidic	
Sp:Gravity	1018	
Albumin	(+)	
Sugar	Nil	
Bile Sait		
Bile Pigments	Not Present	
M	ICROSCOPY ALLAS	
Pus Cells	0810	
R.E.Cs	1820	
Cnystals	Afew Minimum African Court	
Epith Cells	Afew Milhammad Area Court Afew Mil Dis't 201 Alexandred	
Casts	Nil Dien Jan ham	
Amorphous Urates	(+)	
Ketons	Nil	
Nitrites	(++)	
Triple Phasphate	Nil	
Other Cell	Nil	

For any query contact within 24 hours. Contact: 0311-1583150, 0317-8104939

The facility for all routine and special test are available.

Signature

ALYOUSAF MEDICAL CENTER HAVELIAN

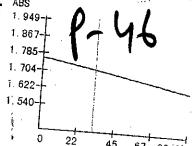


A.H GLINICAL LABO

ACCURACY & QUALITY /

AL YOUSAF MEDICAL CENTER 1 ABS

Sample Abs Curve Test: UREA Sample No.: 1 Result: 28.309 mg/dl Normal range:5.000-45.000mg/d



Diagnostic & Specialized Pathology Serv

Name : Ifthakar Begum		Age:	Sex:	
Specimen: Blcod.	Ref By :Dr Faisal	Qureshi	Date	

Sample Abs Curve Test: CR Sample No.: 1 Result: 0.876 mg/dl Normal range:0.500-1.200mg/dl

BIOCHE	MISTRY	ABS 0. 344	
Glucouse (Fasting) 60 – 110	/ //	0. 212-	
Glucose (Random) 60 - 160	Alle	0. 079 0. 013	
Bilirubin Total 0.1 - 1.0	Whith Advocate High Court Advocate High Court	0 27 55 82 11	10 (S)
ALT/S.G.P.T 0.2 – 41 U/!	Minham destant Court Advocate High Court Office No. 33 Adjacent Office No. 301 Abh	U/I	•
ALK Phosphates 45 ~m 270 U/i)IST	U/I	
Blood Urea 20 – 50 mg/dl	28	mg/dl	
Uris Acid (M) 3.0 - 7.0 (F) 2.5 - 6.0		mg/di	
Creatinine 0.7 – 1.2 mg/dl	0.8	mg/dl	
Cholesterol 150 – 200 mg/dl		mg/dl	
Remoglobin (M) 14 – 18 (F) 12 – 16		g/dl	
Ca2+(CACPC) 7.0 11.0		mg/dl	
S.Amaylase 25125		Ų/I-	

For any query contact within 24 hours. Contact: 0311-1583150, 0317-8104939

The facility for all routine and special test are available.

Signature

TALYOUSAF MEDICAF CENTER HAVELIAN



- 100 A 7

A.H CLINICAL LABORATORY

ACCURACY & QUALLETY ASSURED ALYOUSAF MEDICAL CENTER HAVELIAN O

Description of The Manual State of the state

Name: Titha Ka	* Beeum	Age:	Sex: Femail
Spesimen:Blood.	Ref by Dig Faire	d Augusti	Date: 28.05.18

HEANIATOLOG	4091
WBC 4.00- 11.00x10^9/L	Gian# 4.8 x 10°/L
LYM# 0.80-4.00x10^9/L	%4d% 5.5 %
MID# 0.101.00x10^9/L	
GRA# 2.007.80±10^9/L	RBC 2.77 x 10 ¹² /L HCT 29.9 %
LYM% 20.00—50.00	MOV 163.2 ft.
MID% 1.00—15.00	MCHC 25.7 g/dL
GRA% 40.0070.00	RDW-SD 81.3 fL PLT 275 x 10°/-
HCB (M) 14-17 (F) 12-15 g/dl	MPV 7.8 fL PDW 15.3
RBC 4.095.74x10^12/L	PCT 0 214 %
HCT 38.0050.80%	////
IACV 83.9099.10 IL 'highammat Al'shed' Advocate High	n Court
MCH 27.80—33.60 This hammar highest high market high high high highest	po':-
MCHC 32.00—33.00	
REW-CV 19.8015.00 %	
RDW-SD 35.0056.00 fL	6 50 20 150 200
PLT 150.00450.00 xi9^9/L	ন্ <u>্</u>
MPV 7.00—11.00 tL	
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PCT 0.103.55 %	

Signature

For any quary contact within 24 hours. Contact: 0311-1503150, 0317-8104639 The facility for all routine and special test are available.

CANTELLIAN TO THE A MONTHAN



Name:

Committed to Excel in Quality

Name: 1) The Kar- besh	g Age: Sex:
Specimen: Blood. Ref by:	Date: 28-5.8
SERAL	OGY
Blood Group	
RH Factor	
RA Factor	·
A.S.O Titre (Adults < 200 I.U/ml)	I.U/mI
V.D.R.L	
Brucella Test(Aborts):	Mellintensis:
Toxoplasmosis: IgM:	IgG:
HBs.Ag	· .
H.C.V	A / a/
HIV	111800
H.Pylori	PU
Blood Mp	
ICT -TB: IgM	IgG:
Dengue : IgM:	IgG: A. //255'a High Callill
Dengue NS-1	Linca to 33 Adjacent to
Chikungunya: IgM:	IgG : " or Abbottabad
Typhi Dot IgM:	IgG :
Mantoux:	
Trop-T	
CRP. < 6 mg/l	sifice (tive) 24 mg/1
WIDAL	TEST
S.Typhi O	
S.Typhi H	
Paratyphi AH	
Paratyphi BH	
Widal Result	

For any query contact within 24 hours. Contact: 0992-812220

The facility for all routine and special test are available.

Signature

بروفيسر ڈاکٹرعلی اصغرشاہ سو الشافي Dr. Ali Asghár Shah اليم - بي - إلى السيم المراب الم M.B.B.S., M.C.P.S., F.C.P.S. الفي-ي- بي-اليس ئىلانى ھاسپتل كەپلىكىي ماہرامراض جزاحی وہڈی، جوڑ، پہٹھہ نزدكالا بل،مير پور ايبٽآباد فون فمرز 68 02 40 40-992 Almit P-49 Not Valid for Medico Legal Purpose Granbes. افتریکی: RITA K. J. K. Sorgarpo Jaconhum 2- f. 7. 705 ml/m stut. 3/4 Pa At fame 3-3, Da 3 1/m Plut Ed Weile Hunson 4 h. Chem-one Alle 5- Ringalact - D/v dunkt ,-do politiships 2 M Anthropilan Attosled 3 drs Referenday M. h try It Shouldran Auvocate High Office Not 33 Adjacem to Distt. Bar Abbottabort فأغه بروزاتؤر

GILLANI LAB

ACCURACY & QUALITY ASSURED Gillani Hospital

SYED RIZWAN AU SHAH M.B.B.S. FCPS (Part

AITIENT'S NAME

FEMALE

Prof. Dr Ali Asghar Shah DATE & TIME:

07-09-17 19

BLOOD CROSS MATCH

RECEPIENT AOB GROUP RECEPIENT PHESUS .

POSITIVE

DONOR NAME

DONOR AOB GROUP

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BLOOD BEGINO

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POSITIVE

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CONER'S TESTS

RESULT

HBsAg

HCV

NEGATIVE

NEGATIVE

COMPATIBILITY

IN SALINE PHASE

COMPATIBLE

Allsli

24 Hours Services

The Vacilities for all Routine & Special Test are Available

Manschra Road, Mirpur, Near Kalapul Abhottabad. Cell # 0313-5819989

Gillani Lab

ACCURACY & QUALITY ASSURED Gillani Hospital

DR SYED RIZWAN ALUSHAH M.B.B.S. FCPS (Part D)

PAITIENT'S NAME FIKHAR BEGAME GENDER:

FEMALE

Prol. Dr. Ali Asghar Shah DATE & TIME:

07-09-17 14:3

HAEMATOLOGY

BLOOD CROSS MATCH

RECEPIENT AOB GROUP RÉCEPIENT RHESUS

POSITIVE

DONOR NAME

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NEGATIVE

COMPATIBILITY

IN SALINE PHASE

COMPATIBLE

24 Hours Services

The Facilities for all Routine & Special Test are Available Mansehra Road, Mirpur, Near Kalapul Abbottabad. Cell # 0313-5819989

Can't be used for legal Purposes

GILLANI LAB

ACCURACY & QUALITY ASSURED

Gillani Hospital

DR. SYED RIZWAN ALL SHAH M.B.B.S., FCPS (Part I)



PAITIENT'S NAME:

IFTIKHAR BEGUM

GENDER:

FEMALE!

REFERED BY:

Prof. Dr Ali Asghar Shah

DATE & TIME:

06-09-17 23:47

			#11.71 ¹
TEST NAME	RESULT	<u>UNITS</u>	REF. RANGE
		•	(N)
HEAMATOLOGY			9,0 V
TLC TO THE STATE OF THE STATE O	13,400	/cmm	4500 - 11000
Haemoglobin	10.2	g/dL	M 14-18 / F 12-16
Platelet Count	374,000	/cmm	1,40,000/4,00,000
et N			
Diff.Leuc. Count (DLC)			
Meutrophils	7.8	%	54-62
Lymphocytes	2 0	%	25-33
Monocytes	01	%	03-07
Eccinophils	01 -	%	01-06
CHEMISTRY			
Glucose (random)	93	mg/dL	80 - 160
Glucose (Fasting)	**	mg/dL	- 55 - 115
UREA	3 9	mg/dl	12 45

TEST NAME

RESULT

Allesho

SEROLOGY

Hep. Bs Antigen [ICT Method]

Hep. C Antibody (ICT Method)

NEGATIVE

NEGATIVE

Office of School tabad

24 Hours Services

The Facilities for all Routine & Special Test are Available Manschra Road, Mirpur, Near Kalapul Abbottabad. Cell # 0313-5819989 Signature

Can't be used for legal Purposes

GILLANI LAB

ACCURACY & QUALITY ASSURED

Gillani Hospital

DR SYED RIZWAN ALL SHAH M.B.B.S FCPS (Part 1) Peshawar

P. 53

PAITIENT'S NAME.

IFTIKHAR BEGUM

GENDER:

FEMALE

REFERED BY

DATE & TIME

06-09-17 23:48

TEST NAME

RESULT

SEROLOGY

Blood Group

Rhesus Group

00+IVE

POSITIVE

Allested

Advodate High Fourt

Office No. 13 Adjacemix

Office No. 13 Adjacemix

24 Hours Services

The Facilities for all Routine & Special Test are Available
Manseitra Road, Mirpur, Near Kalapul Abbottabad. Cell # 0313-5819989

Signature'

Pantle used for teaal Durbases



Dr. Syed Danish Mehmood

MBBS, FCPS (Ortho & Trauma)
ORTHOPAEDIC & TRAUMA SURGEON

Member international congress for joint Reconstruction (USA) Member SICOT (Belgium) Member Asia Pacific Arthroscopy Society



I B JAN 2017

12tikner Begum Age:

Angected Non-unio-

Need to. Muhammaharana.

DR FARID ZIMRI DR FAISAL QAIYUM

For Appointment: 0336-0581198, 0334-9494305

LBONE & JOINT CLINIC

Email: punjtani@hotmail.com facebook. com/bone5joint www.orthopaedic.pk

ALLAMA IQBAL HOSPITAL

Shakar Shah Road, Near Fawara Masjid Haripur Ph: 0995-627555

Stop Antibiotic

Repeal
C/S

After 03 In

Adv .

Hbs 14cu 12iu

509 du 000 P-55
Annex - 8

ORDER

This office order will dispose of the departmental enquiry agains Constable Shakeel No.509. He while posted at Police Post POF Havelian absented himself vide Daily Dairy No. 08 dated 01-03-2017 to till date (17 months) without any leave or permission.

He was issued Charge Sheet along with statement of allegations Mr. Muhammad Ishtaiq DSP Cantt:, Abbottabad was appointed as Enquiry Officer He conducted proper departmental enquiry against the delinquent officer and recorder statements of all concerned. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings, wherein allegations have been proved and recommended for major punishment.

Therefore, in exercise of the powers vested in the undersigned Police Disciplinary Rules-1975, (amended 2014), I, Abbas Majeed Khan Marwat PSP, Distric Police Officer, Abbottabad as a competent authority, am constrained to award him the punishment of Dismissal from service with immediate effect.

Order announced:

District Police Officer

No.3203-4/PA 6-8-20 (P

Copy to:

- 1. The Establishment Assistant.
- 2. The Pay Officer, DPO Office Abbottabad.

The OASI DPO Office along with complete Enquiry File containing

2D pages for completion of record

West eld

Muhammad Arshad Khan Tanoli Advodate High Court

office No 13 Adjacent to Distil 13 Abboffabad OB NO-220

8.18

P-56 Annex-C

This order is hereby passed to dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules 1975 submitted by Constable Shakeel Ahmad No:1384 of Abbottabad District against the order of punishment i.e. Dismissed form service awarded to him by the District Police Officer, Abbottabad vide his OB No: 220, dated 02.08.2018.

Facts leading to punishment awarded to him are that he while posted at PP POF Havelian absented himself from duty from 01.03.2017 to 02.08.2018 (17 months) without any leave or permission.

After receiving his appeal, comments of DRO Abbottabad were obtained which were examined/ perused. The undersigned called him in O.R on 02.07.2019, heard in Person where he failed to explain any plausible reason in his defence. Therefore a person who had been dismissed four times having bad entries 27 and Minor 11 entries shall have no place in police, hence his appeal is filed.

REGIONAL POLICE OFFICER
Hazara Region Abbottabad

No. 2293

PA, dated Abbottabad the $OS \cdot 7$. /2019.

Copy of above is forwarded to the District Police Officer, Abboitabad w/r to his office letter No: 1654/legal, dated 29-03-2019 for information and necessary action. Service Roll & Fauji Missal containing enquiry file are returned for your office record.

uh mknav Arshad Khan Taroli Advocate High Court

lestel

Advocate High Coon to Office Not 33 Adjacent to Dist Bar Adjacent to

REGIONAL POLICE OFFICER Hazara Region Abbottabad

عافير الماس سكر سال المال هو المراس المال الموجوري عاقت ساره رواست ساعافزان درواست سارسال Endinging wife مین لوارش سوگی درخواست عراه د سرآ ردی دادی عراه لف Advocate High Court

Ahnex-D

P-57

Annex - E



OFFICE OF THE INSPECTOR GENERAL OF POLICE KNYBER PAKUTUNKHWA PESHAWAR

No. 81 169

720, dated Peshawar the 26 10 12020.

b- 28

ORDER

This arder is hereby passed to dispose of Revision Patition under Rule 1-A of Khyber Pakhtinkhwa Police Rule 1975 (amended 2014) submitted by Ex-FC Shakeel Ahmad No. 1384/509. The patitioner was dismissed from service by District Police Officer, Abbottabad vide OB No. 220, dated 02.08/2018 on the allegations of absonce from duty w.c.f 01.03.2017 till date of dismissal from service i.e. 02.08/2018 for total period of 17 months. His appeal was filed by Regional Police Office, Hazara vide order linds: No. 2293/PA, dated 08.07.2019.

Meeting of Appellate Board was held on 21,10,2019 wherein petitioner was heard in person.

During hearing petitioner contended that the leg of his mother was fractured in road accident in the year

2017.

Perusal of the record reveals that he remained absent for long period of 17 months. He has carried 40 bad entries during his service. He was earlier thrice dismissed from service in the year 2002, 2008 & 2014 on the charges of absence from duty which establishes that he is habitual absence and there is no prospects of mending his ways. The Board see no ground and reasons for acceptance of his petition, therefore, his petition is hereby rejected. However, his penalty of dismissal from service is converted into removal from service.

This order is issued with the approval by the Competent Authority.

Muhamma Xironed Khan Tanoli Advocate High Court Office No: 33 Adjacent to

(ZAIB ULLAFI KHAN)
AIG/Establishment;
For Inspector General of Pollee,
Khyber Pakhtunkhwa,
Peshawar.

No. St 170 - 175 120,

Cupy of the above is forwarded to the:

- 1. Regional Police Office, Hozara at Abbatlabad,
- 2. District Police Officer, Abbottabed! One Service Roll alongwith Fault Missal containing enquiry file of the above named Exil C resolved vide your office Mone: No 6078/Legal dated 25.09.2019 is returned horselfth for your office report.
- J. PSO to IGP/Khyber Paklimakhan, GPO Penhawan
- C. PA to Addl: IOP/IIQis: Kliybor Pachtunkhwa: Feshinwar
- 1. PA to DICT I Que Khylk thakhillinka yai Peshavar.
- 6. PA in AICIT apul. Khybor Pakilililihym, Torbawar.
- 7. One significative cool about

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ORDER

This office order will dispose of the departmental enquiry against Constable Shakeel No.509. He while posted at Police Post POF Havelian absented himself vide Daily Dairy No. 08 dated 01-03-2017 to till date (17 months) without any leave or permission.

He was issued Charge Sheet along with statement of allegations. Mr. Muhammad Ishtaiq DSP Cantf., Abbottabad was appointed as Enquiry Officer. He conducted proper departmental enquiry against the definquent officer and recorded statements of all concerned. After conducting proper departmental enquiry, the Enquiry Officer submitted his findings, wherein allegations have been proved and recommended for major punishment.

Therefore, in exercise of the powers vested in the undersigned Police Disciplinary Rules-1975, (amended 2014), I, Abbas Majeed Khan Marwat PSP, District Police Officer, Abbottabad as a competent authority, am constrained to award him the punishment of Dismissal from service with immediate effect.

Order announced.

District Police Officer Abbottabad

No. 3203-4/PA 6-8-20 18

Copy to:

The Establishment Assistant

The Pay Officer, DPO Office Abbottabad.

The OASI DPO Office along with complete Enquiry File containing 3.

21 pages for completion of record

Khan Tanoli

Alleste

Advocate High Court

Office No. 33 Adjacent to 26 410-220

31/1/2020

- 1 Abbas Majeed Khan Marwat (PSP) District Police Officer Abbottabad as competent authority hereby charge you Constable Shakeel Ahmed No. 509, Police Post POF Havelian, as explained in the attached statement of allegations.
- You appear to be guilty of misconduct under Police disciplinary Rules 2). 1975, and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary Rules. ...
- You are therefore, directed to submit your written defense within seven 3). days on the receipt of this Charge Sheet in the Enquiry Officer.
- Your written defense, if any shall reach the Enquiry Officer with in the 4). specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.
- Intimate whether you desire to be heard in person or otherwise. 5).
- A statement of allegations is enclosed. 6).

Abbas Mafeed Khan Marwai, PS District Police Officer **SAbbottabad**

Streng (*)

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Rea No. 33 Adjacent to -rinhottabad

Advocate High Count

superintendent of lice Abboliaba 11/2020

DISCIPLINARY ACTION

I Abbas Majged Khan Marwat (PSP) District Police Officer Abbottabad as Competent Authority of the opinion that you Constable Shakeel Ahmed No. 509, Police Post POF Havelian, rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975

STATEMENT OF THE ALLEGATIONS

You while posted at Police Post POF Havelian absented yourself vide Daily Diary No. 08, dated 01-03-2017 (15 months and 20 days) and are still absent without any leave or permission.

For the purpose of scrutinizing your conduct with reference to the above allegations, Mr. Muhammad Ishtiaq, SDPO Cantt:, Abbottabad is appointed as

The Enquiry Officer shall in accordance with the provision of this Enquiry Officer. ordinance, provide reasonable opportunity of hearing to the accused, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action the accused.

The accused a well conversant representative of departmental shall in the proceedings on the date, time and place fixed by the Enquiry Officer.

han Tanoli 'Muhammad Arsi

Abbas Hajeed Khan Marwat, PSP district Police Officer 4-Abbottabad

IPA, Dated Abbotrabad the

Constable Shakeel Ahmed No. 509, Police Post POF Havelian, with t direction to submit his defense within 07 days of the receipt of this statement allegations and also to appear before the Enquiry Officer of the date, time place fixed for the purpose of departmental proceedings

Superintendent of Police Abbottabail 31)2/2020

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•	Aspellant	منجانب:
		نوعيت مقدمه

باعث تحريرآ نك

مندرجه میں اپنی طرف سے واسے بیروی وجواب دہی کل کاروائی متعلقه آل مقام

کووکیل مقرر کر کے اقر ارکرتا ہوں کہ صاحب موصوفطہ کا Adiagent to کا کا ال اختیار ہوگا نیز وکیل صاحب موصوف کوکرنے راضی نامہ وتقرر ثالث و فیصلہ برحلف ودینے اقبال دعوی اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیدوعرضی دعوی کی تقیدیق اوراس پر دستخط کرنے گاا ختیار ہوگا اور بصورت ضرورت مقدمه مذکور کی کل پاکسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کواینے ہمراہ اپنی بجائے تقرر کا اختابر بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختہ مجھ کومنظور و قبول ہوگا۔ دوران مقدمہ جوخر چہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق ویل صاحب ہول گے۔ نیز بقایار قم وصول کرنے کا بھی اختیار ہوگا۔اگر کوئی پیشی مقام دورہ پر ہویا حدیے باہر ہوتو وکیل صاحب موصوف یا بند ہوں گے کہ پیروی مقدمہ ندکورہ کریں اور اگر مخار مقرر کردہ میں کوئی جزو بقایا ہوتو وکیل صاحب موصوف مقدمہ کی پیروی کے یابندنہ ہوں گے۔ نیز درخواست بمراداستجارت نالش بصیغمفلسی کے دائر کرنے اوراس کے پیروی کا بھی صاحب موصوف کواختیار ہوگا۔

لہذا و کالت نامہ تحریر کرویا تا کہ سندر ہے۔

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

SERVICE APPEAL NO. 822/2020.

Shakeel Ahmed Ex- Constable No. 509, village Langra, P.O. Havelian, Tehsil Havelian District Abbottabad.

.....APPELLANT.

VERSUS

- 1. Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
- 2. Regional Police Officer, Hazara Region, Abbottabad.
- 3. District Police Officer, Abbottabad.

....RESPONDENTS.

The Para-wise Comments by Respondents:-

Respectfully Sheweth

PRELIMINARY OBJECTIONS:-

- 1. That the instant Service Appeal is not maintainable in the present form.
- 2. That the appellant is estopped by his own conduct to file the instant appeal.
- 3. That the appellant has not come to the Hon'ble Tribunal with clean hands.
- 4. That the appellant has suppressed material facts from the Hon'ble Tribunal.
- 5. That the instant Service Appeal is not maintainable for non-joinder/ miss-joinder of necessary parties.
- 6. That the instant Service Appeal is barred by law and limitation.

ON FACTS:-

- 1. Pertains to record.
- 2. Incorrect. The appellant was posted in the Police Post POF (Pakistan Ordinance Factory) Havelian wherefrom he absented himself, vide daily diary No. 08 dated 01.03.2017, without prior permission from the competent authority. The appellant being a member of discipline force, ought to obtain leave from the competent authority, but he did not bother to do the same and violated law and rules in vogue. (Copy of daily diary is attached as annexure "A").
- 3. Incorrect, the appellant deliberately avoid to join the departmental proceeding against him and to that effect charge sheet was dully served upon him properly, inquiry was conducted and thereto appropriate punishment was awarded to appellant under the rules. (Copies attached as Annexure B, B-1).
- 4. Pertains to record.

- 5. Pertains to record. Lenient view has already been taken by the authority by converting his dismissal into removal.
- 6. Incorrect. The requisite record/ documents were already given to appellant. On his request copies of showcause notice, charge sheet, final showcause notice and dismissal order were provided to him again. (Copies of application and departmental enquiry are attached as Annexure "C, C-1 and C-2").
- 7. On following grounds, the appellant is estopped by his own conduct to file the appeal which is not maintainable.

GROUNDS:-

- a. Incorrect, the impugned orders have been passed after observing all codal formalities, hence liable to be maintained.
- b. Incorrect, appellant was posted in the Police Post POF (Pakistan Ordinance Factory) Havelian wherefrom he absented himself, vide daily diary No. 08 dated 01.03.2017, without obtaining any leave or permission from the competent authority. The appellant being a member of discipline force, had to obtain leave from the competent authority, but he did not bother to do the same, which is a sheer violation of law and rules on the part of the appellant.
- c. Incorrect, appellant was provided opportunity of personal hearing in Orderly Room and was dealt in accordance with law /rules as well all codal formalities have been fulfilled by the respondents.
- d. Incorrect, impugned orders have been passed after observing all codal formalities and liable to be maintained.
- e. Incorrect, appellant being a member of discipline force, violated all the discipline norms and remained absent from duties for 27 times (Total 1313 days) during 23 years of service therefore, he was proceeded against departmentally. (Detail of absence is attached as Annexure "D, D-1").
- f. The appellant is estopped by his own misconduct to create the situation of unemployment.
- g. Incorrect. Appellant has committed misconduct by absenting from official duty without any sanctioned leave.
- h. As explained in para B of the grounds above.

PRAYER.

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

Inspector General of Police, Khyber Pakhtunkhwa, (Peshawar. (Respondent No.1)

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

> Discript Police Officer, Abbottabad. (Respondent No. 3)

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

SERVICE APPEAL NO. 822/2020.

Shakeel Ahmed Ex- Constable No. 509, village Langra, P.O. Havelian, Tehsil Havelian District Abbottabad.

.....APPELLANT.

VERSUS

- 4. Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
- 5. Regional Police Officer, Hazara Region, Abbottabad.
- 6. District Police Officer, Abbottabad.

....RESPONDENTS.

AFFIDAVIT.

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

Submitted please.

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

(Respondent No.1)

Regional Police Officer, Hazara Region, Abbottabad.

(Respondent No.2)

District Police Officer,

Abbottabad.

(Respondent No. 3)

Amoxwe "A" 13/10/18/10/19 مرا و در المراجع عبل د لور المراجع ال و با في نور دا معلم نها جو مبلد با في و دو و مبلل في عموانو كا ورفى دورُ ما هي بوقف أهل دست على ٥ ورس داو قد أهراك Il & mean enclosed by سالعال بعل عبدان دخل ف Dish feath mitte PP-Pap 21-6-18 Plante. 19296 Recionie on 28/06/2018

CHARGE SHEET

- 1). I Abbas Majeed Khan Marwat (PSP) District Police Officer Abbottabad as competent authority hereby charge you <u>Constable Shakeel Ahmed No.</u> 509, Police Post POF Havelian, as explained in the attached statement of allegations.
- 2). You appear to be guilty of misconduct under Police disciplinary Rules 1975, and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary Rules.
- 3). You are therefore, directed to submit your written defense within seven days on the receipt of this Charge Sheet in the Enquiry Officer.
- 4). Your written defense, if any shall reach the Enquiry Officer with in the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.
- 5). Intimate whether you desire to be heard in person or otherwise.
- 6). A statement of allegations is enclosed.

Abbas Mareed Khan Marwat, PSP District Police Officer ZAbbottabad

1310155 (D 146-5) 0313890 (160)

DISCIPLINARY ACTION

I Abbas Majeed Khan Marwat (PSP) District Police Officer Abbottabad as Competent Authority of the opinion that you Constable Shakeel Ahmed No. 509, Police Post POF Havelian, rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975.

STATEMENT OF THE ALLEGATIONS

- You while posted at Police Post POF Havelian absented yourself vide Daily Diary No. 08, dated 01-03-2017 (15 months and 20 days) and are still absent without any leave or permission.
- For the purpose of scrutinizing your conduct with reference to the above allegations, Mr. Muhammad Ishtiaq, SDPO Cantt:, Abbottabad is appointed as 2).
- The Enquiry Officer shall in accordance with the provision of this Enquiry Officer. ordinance, provide reasonable opportunity of hearing to the accused, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or the appropriate action the accused.
 - The accused a well conversant representative of departmental shall in the proceedings on the date, time and place fixed by the Enquiry Officer. 4).

Abbas Majeed Khan Marwat, PSP Bistrict Police Officer 4Abbottabad

No: 121 /PA, Dated Abbottabad the 2916 /2018.

Constable Shakeel Ahmed No. 509, Police Post POF Havelian, with the direction to submit his defense within 07 days of the receipt of this statement of allegations and also to appear before the Enquiry Officer of the date, time and place fixed for the purpose of departmental proceedings.

, Annouve. "C" 1/1 in (mi 220 (xx) 1/16 w of) 13 ju 100/1.5 18/1/19 (PO) /1/10/1/01/2016 in Swindels ا عار حشي ع) شوكار ذويمس 1/1 1 1 6/2020 des 168 William 12 من سام رور رو در اس میں ایم ایم ایک سام کے 0 GIP onice my constant suit de l'il de l' ه سول کری پی July Sel Co 20 1 July 200 1 20 (1) b) For when as per 030-8801160 rules N W میں نے کامعن درار حطلوس کا غذرے کر نہیں 5, b that 1 Applicant is entertled - 3 & Calis DisciPlang Action To get The copy of his مرل کی ہے dismissal order, of sheet. S.C. Nond F. A.N (pletible DSP/Legy 30-1-2020

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From:

The Dy: Superintendent of Police,

Cantt Abbottabad.

To:

The District Police Officer,

Abbottabad.

No. 729.

/Dated Abbottabad the

3/ 07/2018.

Subject:

DEPARTMENTAL ENQUIRY AGAINST CONSTABLE SHAKEEL AHMAD NO. 509 POLICE POST POF HAVELIAN DISTT:

A.ABAD.

Memo:

BRIEF FACTS.

He while posted in Police Post Havelian absented himself vide daily diary No. 08 dated 01.03.2017 (15 months and twenty days) and is still absent without any leave or permission.

For the purpose of scrutinizing his conduct with reference to the above, allegations, undersigned was appointed as enquiry officer.

ENQUIRY PROCEEDINGS.

Undersigned proceeded accordingly and called the delinquent official but despite information he did not bother to join the enquiry nor he intimated this office regarding his problem.

Copy of charge sheet and statement of allegations have been served upon him through DFC Havelian Akhtar Nawaz. No. 1021. His statement was recorded in which he stated that he personally handed over the copies of charge sheet and statement of allegations and took his signatures as a token of receipt.

, From the perusal of his service record, following has been noted:-

- 1. He was enlisted in Police Department on 24.01.1995.
- 2. During this tenure, he was dismissed from service three times as evident from his service record, vide OB No. 219 dated 07.06.2002 when he absented himself from FRP Hazara Platoon No. 37/HR. He again dismissed from service vide OB No. 166 dated 09.05.2008 when he absented himself from duty.
- 3. He again dismissed from service vide order No. 40 dated 12.02.2014

(D)

- 4. There are 50 bad/red entries in his service record and he was awarded punishment by the competent authority.
- 5. Now he has absented himself with effect from 01.03.2017 and is still absent which shows that he is an unwilling police officer and not interesting to serve more in Police Department as he himself received the charge sheet and statement of allegation and called through this office land line number 0992-9310031 to join enquiry proceedings but he even not appear nor bother to submit its reply through any source.

FINDINGS.

Keeping-in-view-of-above-undersigned-reached-to the conclusion that FC Shakeel No. 509 is an habitual-absence due to-which he was removed from service three-times. His service record shows that he is unwilling and no interest to serve-more-in Police Department. Therefore, he is recommended for major

punishment for the lesson of other force.

Submitted please.

Submitted for favour of Oxforder OPZ.

(MOHAMMAD ISHTIAQ)

Dy: Superintendent of Police, Cantt Abbottabad.







PUNISHMENT RECORD OF EX-CONSTABLE SHAKEEL NO.509 DATE OF ENROLMENT: 24-01-1995

DETAIL OF PUNISHMEHENT

DETAIL OF PUNISHMEHEN I				
ARGES	PUNISHMENT AWARDED			
days absented	Leave Without Pay/ Fine Rs:100			
day absented	Leave without pay			
days absented	Leave Without Pay			
days absented	Leave without pay/warning			
days absented	Fine Rs:100/-			
days absented	Fine Rs:400/-			
6 days absented	Leave without pay/quarter guard for 05			
, days deserved	days/warning			
2 days absented	Fine Rs:100			
3 days absented	Leave without pay			
2 days absented	Leave without pay			
6 days absented	Leave without pay			
04 days absented	Leave without pay			
38 days absented	Leave without pay			
01 day absented	Fine Rs:100			
06 days absented	Leave without pay/ Fine Rs:100			
	Leave without pay/Forfeiture of two year			
76 days absented	approved service			
02 days absented	Fine Rs:200/-			
- 12 days absented	Leave without pay			
55 days absented	Dismiss from service			
01 day absented	Leave without pay			
01 day absented	Leave without pay			
78 days absented	Censure/ leave without pay			
200 days absented / not interested in his job	Dismiss from service / leave without pay			
127 days absented	Leave without pay			



27 days absented	•	Leave without pay	,
63 days absented	1995 A	Leave without pay	
			•
510 days absented (17	months)	Dismiss from service	
			•
Total Absented Days =	= 1313 days		
		. *	

INCHARGE ESTABLISHMENT BRANCH DPO OFFICE, ABBOTTABAD