

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
CAMP COURT SWAT

Service Appeal No.1329/2015

Date of Institution... 14.09.2016

Date of decision... 09.11.2017

Numan Khan son of Amrali Khan, R/O Mohallah Azi Khel, village Aladand,  
Tehsil Batkhela District Malakand. ... (Appellant)

Versus

1. Regional Police Officer, Malakand Region, at Saidu Sharif Mingora Swat and  
2 others. ... (Respondents)

MR. MUHAMMAD AYAZ MAJID,  
Advocate

... For appellant.

MR. KABEERULLAH KHATTAK,  
District Attorney

... For respondents.

MR. NIAZ MUHAMMAD KHAN,  
MR. MUHAMMAD HAMID MUGHAL,

... CHAIRMAN  
... MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: - Arguments of the learned  
counsel for the parties heard and record perused.

FACTS

2. The appellant was aggrieved from removal order dated 15.08.2014, against  
which he filed departmental appeal on 29.08.2014 which was rejected on  
06.11.2014. The appellant filed a second departmental appeal on 11.11.2014 which  
was rejected on 12.08.2015 and thereafter, the present service appeal on  
14.09.2015.

ARGUMENTS

3. The learned counsel for the appellant argued that the appellant filed second  
appeal which was entertained and rejected by the Authority; therefore, the question  
of limitation has become irrelevant for this Tribunal. On facts he tried to convince

the Tribunal that the enquiry officers on two occasions did not recommend the penalty of removal from service and the competent authority by ignoring the recommendations of the enquiry officer, imposed major penalty of removal from service. In this regard he relied on the judgment reported as 2007-SCMR-1008. He next argued that the appellant's mother was ill and he was also suffering from psychiatry problems and that his case should have been dealt with leniently by the authority. He next argued that in the relevant rules of 1975 the absence is no ground for initiation of departmental proceedings.

4. On the other hand the learned Addl. Advocate General argued that the present appeal is hopelessly time barred on the ground that the appellant filed second appeal which was not permissible in view of judgment reported as 2013-SCMR-911. The learned AAG further argued that in his appeal, the appellant has taken the plea of his illness but in statement before the enquiry officer he taken the stance of illness of his mother. He summed up that appeal of the appellant is not worthy of consideration.

### CONCLUSION

5. In this very appeal, the issue of limitation is very much crucial and if the Tribunal reaches the conclusion that the appeal is time barred then merits of the appeal cannot be touched.


6. Admittedly the first appeal was rejected on 06.11.2014 and then the appellant preferred second appeal (as per arguments of the learned counsel for the appellant) but the authority entertained the appeal as not the second appeal but as review under Rule 11-A of the Police Rules, 1975. If we consider this appeal as second appeal, then the judgment relied upon by the learned AAG is that second appeal is not permissible nor final rejection of second appeal would enhance the period of limitation for the purpose of service appeal. There is no mention of the

word "revision" in Rule 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. There is only mention of the words, appeal, review or representation. The learned counsel for the appellant tried to convince this Tribunal that this second appeal can be treated as review or representation within the meaning of Section 4 mentioned above. But this Tribunal is not inclined to accept this contention of the learned counsel for the appellant because the review is admissible under Rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986 in case when the order is passed by the Government which is not the case here. The representation is permissible under sub section 2 of Section 22 of the Civil Servants Act, 1973 when no right of appeal or review is available to the aggrieved civil servants which is not the case here.

7. As a result of the above discussion, this appeal being time barred is dismissed. Parties are left to bear their own costs. File be consigned to the record room.



(Muhammad Hamid Mughal)  
Member



(Niaz Muhammad Khan)  
Chairman  
Camp Court, Swat

ANNOUNCED

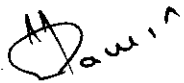
08.11.2017

1329/15

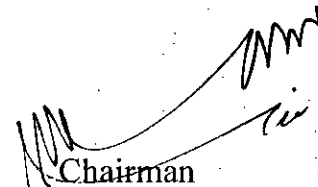
09.11.2017

Counsel for the appellant and Mr. Kabeerullah Khattak, Addl. AG alongwith Khawas Khan, S.I (Legal) for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, this appeal is dismissed. Parties are left to bear their own costs. File be consigned to the record room.



Member



Chairman  
Camp Court, Swat.

ANNOUNCED


09.11.2017

03.1.2017

Counsel for the appellant and Mr. Muhammad Imran, S.I (Legal) alongwith Mr. Muhammad Zubair, Sr.GP for the respondents present. Rejoinder submitted.

During the course of hearing of the case it transpired that 3 charge sheets, 3 enquiries were conducted and one impugned order was passed by the DPO by considering all the charge sheets and enquiry reports. The respondents are directed to produce the said charge sheets, statements and findings duly page numbered, in court with a copy to the appellant on or before the next date of hearing. To come up for final hearing before D.B on 02.05.2017 at camp court, Swat.

  
Member

  
Chairman  
Camp court, Swat

02.05.2017


Counsel for the appellant present. Mr. Khawas Khan, S.I (Legal) alongwith Mr. Muhammad Zubair, District Attorney for the respondents also present. Record vide previous order sheet dated 03.01.2017 not produced by the respondents. The respondents are once directed to produce the same on or before the next date of hearing. To come up for such record and arguments on 06.09.2017 before D.B at Camp Court Swat.

  
(MUHAMMAD AMIN KHAN KUNDI),  
MEMBER,  
Camp Court Swat.

06.09.2017

Appellant in person and Mr. Muhammad Zubair, District Attorney alongwith Khawas Khan, S.I (:Legal) for the respondents present. Counsel for the appellant is not in attendance. Seeks adjournment. Adjourned. To come up for final hearing on 09.11.2017 before the D.B at camp court, Swat.

  
Member

  
Chairman  
Camp court, Swat.

1329/15


06.04.2016

Appellant in person and Sr.GP for the respondents present. Requested for adjournment. To come up for written reply/comments on 08.06.2016 before S.B at Camp Court, Swat.

  
Chairman  
Camp Court, Swat.

08.06.2016

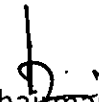
Appellant in person and Mr. Imranullah, Inspector (Legal) alongwith Mr. Amir Qadar, GP for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 05.10.2016 at camp court, Swat.

  
Chairman  
Camp court, Swat.

05.10.2016


Counsel for the appellant and Mr. Muhammad Zubair, Sr.GP alongwith Khawas Khan, SI (Legal) for the respondents present. Counsel for the appellant requested for adjournment as he has not prepared the rejoinder. To come up for rejoinder and final hearing before the D.B on 03.01.2017 at camp court, Swat.

  
Member

  
Chairman  
Camp court, Swat

13.01.2016

Appellant in person present. Requested for adjournment as his counsel is not in attendance. Adjourned for preliminary hearing to 3.2.2016 before S.B at Camp Court Swat.

  
Chairman  
Camp Court Swat

3.2.2016

Counsel for the appellant present. Learned counsel for the appellant argued that that the appellant was serving as Constable when subjected to inquiry on the allegations of willful absence and removed from service vide impugned order dated 15.8.2014 where-against he preferred departmental appeal which was rejected on 12.8.2015 and hence the instant service appeal on 14.9.2015.

That the punishment awarded to the appellant was excessive and contrary to the recommendations of the inquiry officer. That the absence of the appellant was not willful as he was sick and that the inquiry procedure was not properly adopted as the appellant was afforded no opportunity of hearing and that he was not associated with the proceeding.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 6.4.2016 before S.B at Camp Court Swat.

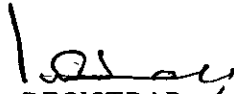



Appellant Deposited  
Security & Process Fee

  
Chairman  
Camp Court Swat

Form- A  
FORM OF ORDER SHEET

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

Case No. 1329/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	27.11.2015	<p>The appeal of Mr. Numan Khan resubmitted today by Mr. Muhammad Ayaz Majid Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	30-11-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>1-12-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	01.12.2015	<p>None present for appellant. The appeal pertains to the territorial limits of Malakand Division as such to be heard at Swat. To come up for preliminary hearing on 7.12.2015 before S.B at Camp Court Swat.</p> <p style="text-align: right;"> Chairman</p>
	7.12.2015	<p>None present for appellant. Notice to appellant be issued for preliminary hearing for 13.01.2016 before S.B at Camp Court Swat.</p> <p style="text-align: right;"> Chairman Camp Court Swat</p>



The present appeal was returned to the counsel for the appellant for completion and resubmission with in 15 days. To day he resubmitted the same without removing the objections which is returned again to the counsel for the appellant with the following remarks:-

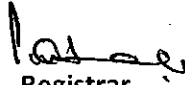
i-Copy of removal order mentioned in para-3 of the memo of appeal not attached with the appeal which may be placed on it. The order dated 06.11.2014 attached with the appeal (Annexure-B) is rejection order of departmental appeal but not a termination order.

NOT removed { (ii) Copy of first departmental appeal preferred/made by the appellant before respondent no.1 (Regional Police Officer Malakand) which has rejected on 6.11.2014 is not attached with the appeal which may be placed on it.

(iii) Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.

No. 1706 /S.T,

DT. 03/11 /2015

  
Registrar  
Service Tribunal  
Khyber Pakhtunkhwa  
Peshawar.

Mr. Muhammad Ayaz Majid Adv. Pesh.

See

Resubmitted for completion  
Planned on file cal  
- 5 5 -

The appeal of Mr. Numan Khan S/O Amrali Khan R/O Mohalla Azi Khel, Village Aladand, Tehsil Batkhela District Malakand received to-day i.e. on 14.09.2015 is incomplete on the following scores which is returned to him for completion and resubmission within 20 days:-

1. Appointment order may be placed on file.
2. Copies of charge sheet/statement of allegations, enquiry report and show cause notice have not been attached with the appeal, which may be placed on file.

No. 14/16 /ST,

Dated 15/9 /2015

REGISTRAR  
KPK SERVICE TRIBUNAL,  
PESHAWAR.

MR. Muhammad Ayaz Majid, Advocate

Su

Re Submitted after  
checking the Appointment order however  
the appellant filed his level best but  
the respondent department refused to  
provide charge sheet/statement of allegations;  
enquiry etc, hence request for  
to be summoned through house  
Tribunal.

1-53

**Before the Tribunal Khyber Pakhtonkhwa Peshawar.**

Appeal No. 1329/2015

Numan Khan

Appellant

Versus

Regional police Officer & others

Respondents

Appeal under Section 4 of the KPK Services Tribunal Act 1974

Index

S.N	Description of Documents	Annexure	P.N
1	Memo of Appeal		1-3
2	Medical Record	A	4-47
3	Appointment order Termination Order	B	48-56
4	Appeal and order of IGP KPK	C	57-59
5	Wakalat Nama		

Dated. \_\_\_\_\_/09/2015

Appellant

Through Counsel

  
Mohammad Ayaz Majid

BEFORE THE SERVICES TRIBUNALS KHYBER PAKHTOONKHWA PESHAWAR.

Appeal No. 1329/15

1  
K.P. Province  
Service Tribunal  
Diary No. 1069  
Dated 14/9/15

Numan khan s/o Amrali khan R/O Mohalla Azi khel ,village Aladand, Tehsil  
Batkhela district Malakand.

**Appellant**

**Verses**

1. Regional Police Officer Malakand Region at Saidu Sharif Moingora Swat.
2. District police officer SWAT Mengora SWAT.
3. Additional inspector general police Khyber Pakhtoon khwa Peshawar.

**Respondents**

**Appeal under section 4 of the KPK services tribunal Act 1974**

Respectfully sheweth;

1. That the Appellant was appointed in as constable of FRP, in Distt. Swat Khyber Pukhtoon Khawa on 02.01.2010, who later on regularized and inducted in Regular Police on 18.07.2013. (applied for supply of copy but was refused)

2. That unfortunately the Appellant fell ill and due to certain depression problems the sickness could not exactly be defined, and the circumstances went beyond the control of the Appellant and remained absent from his duties.

(Copies medical prescription etc annexed as "A")

3. That all of a sudden the Respondent No. 1 on the pretext of the recommendation of departmental Enquiry committee was removed from services vide his order No. 9091 / E ,Dated. 06.11.2014

(Copy of removal from services annexed as "B")

4. That the Appellant filed a departmental appeal against the Order of Respondent No.1, before the Respondent No.3 which was dismissed vide Order No. 9802-6 / E-IV Dated. 12.08.2015.

re-submitted to-day  
and filed.

Registrar  
27/11/15

(Copy of departmental appeal and Order of Respondent No. 3, annexed as "C")

5. That aggrieved by the Orders of the Respondents No. 1 & 3 the appellant was left with no other option but to file the instant appeal before the honorable tribunal on the grounds inter alia;

Grounds.

- I. That the termination order and the order of the Respondent No.3 is not legal and not tenable in the eyes of law.
- II. That the Malakand region specially the home District of the target of terrorism which has caused the depression of the inhabitants and still going under severe stress, and while deciding an appeal the mental status and his capacity has to be considered first.
- III. That no enquiry has been conducted by the and if so, may be in back of the appellant which is against the law, fact and circumstances.
- IV. That no proper opportunity of hearing has been given to the appellant and on this score too the impugned Orders are not maintainable.
- V. That the appellant was ill during the days and not even manage to approach the department for sick leave.
- VI. That other points of law and facts shall be raised / argued if required for the assistance of the honorable tribunal.

It is therefore requested that on acceptance of the instance appeal the Order No. 9091 / E ,Dated. 06.11.2014 issued by the Respondent No.1 and Order No. 9802-6 / E-IV Dated. 12.08.2015 issued by the respondent no.3 may be set aside and the appellant may be re instated from the date of removal from services.

Appellant

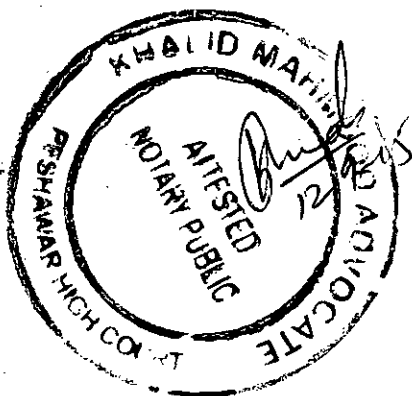
Through Counsel

Mohammad Ayaz Majid Advocate

Affidavit

I, Numan khan s/o Amrali khan R/O Mohalla Azi khel ,village Aladand, Tehsel Batkhela district Malakand, do hereby solemnly affirmed and state on oath that all the contents of appeal are correct to the best of my knowledge and belief and nothing has been concealed from the honorable tribunal.

Deponent



Sent To: \_\_\_\_\_

# OUT DOOR PATIENT TICKET

Ammedure. (A)

(A)  
(9)

District \_\_\_\_\_ CRP No: 58918  
 Facility Name UJA  
 Name \_\_\_\_\_ Age: \_\_\_\_\_ Sex: \_\_\_\_\_  
 Father's/Husband's Name \_\_\_\_\_

Monthly OPD Serial No. \_\_\_\_\_  
 Provisional Diagnosis: \_\_\_\_\_

Date	Clinical Findings / Investigations / Treatment / Referred / Test Findings
04/06/14 Anorexia Fatigue Piles (+)	Cap. Hepto Camo 53 x 15 1-1-1
B.P. $\frac{110}{70}$	2cp. Cynodol - C 1-1-1 53 x 15
T.S. (N) Ad. HBS WCV SGPT, SBR UREA	3cp. Rengalact - A 1000 1/v (3) 7 Bejatal - T - (1) 25% — (2) 53 x 3 2/3

*[Handwritten Signature]*

# Healthcare Clinical Laboratory <sup>®</sup>

H.R.A: Reg: No. HRA / 500 / F / MD / LAB / 06-----E-mail: hazirkhan49s@hotmail.com



5

Shaheen Market, Near D.H.Q Hospital, Batkhela, Distt: Malakand  
Tel: 0932 412011 - 0333 9462332 - 0346 6371696

ہیلتھ کیئر کلینیکل لیبارٹری بسٹ خیلہ (رجسٹرڈ)

NAME: NUMAN LAB NO.14591/14  
GENDER/AGE: M/ ADULT  
TEST REQUIREMENT: HBSAg, ANT-HCV, SBRT, SGPT  
CONSULTANT: SELF  
DATED: Wednesday, June 04, 2014

TEST	RESULT	UNIT	REF RANGE
SGPT(ALT)	243	u/l	10-----50
SBRT	2:3	mg/dl	0.2-----1.2

HEPATITIS B SURFACE ANTIGEN (HBsAg) POSITIVE  
HEPATITIS C VIRUS ANTIBODIES (Anti-HCV) NEGATIVE

Test method used: ICT.

Impression:

For quires and doubtful results do ask this lab to revise/reconfirm free of cost the tests done on the same day of reporting.  
This report is not valid for medico legal purpose.

Technologist

Microbiologist

Molecular Biologist

Managing Director

**Hazir Muhammad**  
(Molecular Biologist)

M.Phil (Biotechnology) UOM, PGD: D.D.L.S (Pathology) UK, M.Sc (Microbiology) AUP, D.H.M.S (R.H.M.P) N.C.H. Islamabad

Deptt: of Pathology D.H.Q Hospital, Batkhela

Collection Point for: Dr. Anwar Clinical Laboratory (Shrat)

Aga Khan University Hospital Karachi, Shaukat Khanum Memorial Hospital Lahore.



# Healthcare Clinical Laboratory <sup>®</sup>

H.R.A: Reg. No. HRA / 500 / F / MD / LAB / 06-----E-mail: hazirkhan49s@hotmail.com



Shaheen Market, Near D.H.Q Hospital, Batkhela, Distt: Malakand  
Tel: 0932 412011 - 0333 9462332 - 0346 6371696

ہیلتھ کیئر کلینکل لیبارٹری بسٹ خیلہ (رجسٹرڈ)

NAME: NUMAN LAB NO.14614/14  
GENDER/AGE: M/ ADULT  
TEST REQUIREMENT: URINE R/E(BILE SALT/BILE PIGMENT)  
CONSULTANT: SELF  
DATED: Wednesday, June 04, 2014

## (URINE R/E)

### TEST

### RESULT

#### Physical Examination:

Color: Pale yellow  
Appearance: Clear  
PH: 5.5  
SG: 1.025

#### Chemical Examination:

Bile Salt: POSITIVE  
Bile pigment: POSITIVE  
(Reducing Substances)  
Sugar: NIL

#### Microscopic Examination:

Pus cells: 00-----01 /HPF  
Red cells: 00-----01 /HPF

#### Remarks:

- > For quires and doubtful results do ask this lab to revise/reconfirm free of cost the tests done on the same day of reporting.
- > This report is not valid for medico legal purposes.

Technologist

Microbiologist

Molecular Biologist

Managing Director

**Hazir Muhammad**

(Molecular Biologist)

M.Phil (Biotechnology) UOM, PGD: D.D.L.S (Pathology) UK. M.Sc (Microbiology) AUP, D.H.M.S (R.H.M.P) N.C.H. Islamabad

Deptt: of Pathology D.H.Q Hospital, Batkhela

Collection Point of: Dr. Anwar Clinical Laboratory (Swat)

Aga Khan University Hospital Karachi, Shaukat Khanum Memorial Hospital Lahore.

General Physician

Dr. Naveed Alam

M.B.B.S R.M.P. (Pesh)

M.R.C.P-1 (UK)

Medical Officer

D.H.Q Hospital Batkhela

Contact: 0932-415335 - 0333-9501250



7

جنرل فزیشن

ڈاکٹر نَوید عالم

ایم بی بی ایس آر ایم پی (پشاور)

ایم آر سی پی 1 (یو کے)

Name

Abuzar

Age

10 yrs

Sex

M

Date

22-4-2020

Clinical Record

WT = 27kg

G/o

→ Cough (Productive)

Progressive

+ Fever

wt loss

of pallor, Anemic  
icterus (Neg)

L Node (Neg)

edema (Neg) Temp - 98F

ENT - Throat is

Investigation

Conjunctivae

Chest - Bil Crepts

CV - S<sub>1</sub> + 0

GI - Soft / No  
vncg

→ FBC / ESR

→ Widal Test / pp test

○ Urine R/E

Severe Anemia  
Ch Bronchitis

R

→ Tab claritek

Q 10 ← 1 + 1 250mg

→ Tab MNTK 10mg

→ Syb Bronchol

Q 1 1/2 + 1 1/2 + 1 1/2

→ Tab ponstan 1 + 1 - 1

→ Syb Meltofer

(30 3) Q 2 + 2

→ Tab Folic Acid 5mg

→ Syb Lysovit

Q 2 + 2 DND

Sputum for AFB

سرحد میڈیکل سنٹر بالقابل ایمرجنسی گیٹ ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بٹکلہ

Handwritten signature



8

# SARHAD MEDICAL CENTER

Opposite Emergency D.H.Q Hospital Batkhela Malakand

Ph: 0932-415335 Zahcor Ahmad: 03459374505 Shehzad Ahmad: 03339263166

Sarhad Clinical Laboratory, Ultrasound, E.T.T  
Echo, ECG, X-Ray & Blood Bank.

Abuzar	NA / Male
Dr Naveed Alam Sb	Blood
FBC	April 22, 2012

Test	Result	Ex. Value
HB	8.0 gm/dl.	M: 14.0 - 18.0 F: 12.0 - 16.0
TLC	10,100 /Cmm.	4,000 - 11,000
Differential Count:-		
Neutrophils	71 %	40 - 70 %
Lymphocytes	23 %	20 - 40 %
Monocytes	01 %	02 - 07 %
Eosinophils	05 %	01 - 06 %

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.  
 → T3, T4, Tsh, Cardiac Enzyme, Lipids Profile, (HBS Ag, HCV Ab By Elisa Method) Are Available At This Lab.

Lab Incharge

**Collection Point:** Shaukat Khanam Laboratory & Research Centre Lahore  
 Salman Chughtai Laboratory Lahore

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# SARHAD MEDICAL CENTER

Opposite Emergency D.H.Q Hospital Batkhela Malakand

Ph: 0932-415335 Zahoor Ahmad: 03459374505 Shehzad Ahmad: 03339263166

Sarhad Clinical Laboratory, Ultrasound, E.T.T  
Echo, ECG, X-Ray & Blood Bank.

██████████	Abuzar	██████████	NA / Male
██████████	Dr Naveed Alam Stc	██████████	Sputum
██████████	Sputum for AFB.	██████████	April 22, 2012

Test	Result
------	--------

Zn Stain:-

Sputum for A.F.B.	NO A.F.B Seen /200 HPF ✓
-------------------	--------------------------

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The  
 → Test T3, T4, Tsh, Cardic Enzyme, Lipids Profile ( Hba A1, Hba A2 By Elisa Method ) Are Available At This Lab.

Lab Incharge

Collection Point:

Shaukat Kbanam Laboratory & Research Centre Lahore  
Salman Choghtai Laboratory Lahore

10



# SARHAD MEDICAL CENTER

Opposite Emergency D.H.Q Hospital Batkhela Malakand

Ph: 0932-415335 Zahoor Ahmad: 03459374505 Shehzad Ahmad: 03339263166

Sarhad Clinical Laboratory, Ultrasound, E.T.T  
Echo, ECG, X-Ray & Blood Bank.

██████████	Abuzar	██████████	NA / Male
██████████	Dr Naveed Alam Sb	██████████	Blood
██████████	Widal, MP Test	██████████	22-Apr-12

Test	Result
MP (Haemoparasites)	<u>No MP Seen.</u>
WIDAL TEST:	TO: 1/20+ve      TH: 1/160+ve AH: -ve            BH: -ve

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.  
 → T3, T4, Tsh, Cardiac Enzyme, Lipids Profile, (Hbs Ag, Hcv Ab By Elisa Method) Are Available At This Lab.

Lab Incharge

**Collection Point:** Shaukat Khanam Laboratory & Research Centre Lahore  
 Salman Chogatai Laboratory Lahore

11



# SARHAD MEDICAL CENTER

Opposite Emergency D.H.Q Hospital Batkhela Malakand

Ph: 0932-415335 Zahoor Ahmad: 03459374505 Shehzad Ahmad: 03339263166

Sarhad Clinical Laboratory, Ultrasound, E.T.T  
Echo, ECG, X-Ray & Blood Bank.

Abuzar	NA / Male
Dr Naveed Alam Sb	Blood / Urine
ESR, Urine R/E	April 22, 2012

Test	Result	Exp. Value
ESR	49 mm 1st Hour	2 - 15

### URINE R/EXAM:

Physical Character:- Color P-Yellow  
Chemical Examination

Reaction	Acidic ( PH-6 )
Albumin	Nil
Sugar	Nil

### Microscopic Examination.

Pus Cells.....1 - 2 /HPF. RBCs.....0 - 1 /HPF. Epith Cells.....Nil /HPF.

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.

→ T3, T4, Tst, Cardiac Enzyme, Lipids Profile, ( Hbs Ag, Hcv Ab By Elisa Method ) Are Available At This Lab.

Lab Incharge

### Collection Point:

Shaukat Khanam Laboratory & Research Centre Lahore  
Salman Chughtaj Laboratory Lahore

12

General Physician

Dr. Naveed Alam

M.B.B.S R.M.P. (Pesh)

M.R.C.P-1 (UK)

Medical Officer

D.H.Q Hospital Bathkela



جنرل فزیشن

ڈاکٹر نَوید عالم

ایم، بی، بی، ایس آر، ایم، پی (پشاور)

ایم، آر، سی، پی 1 (یو کے)

Cell: 0333-9501250

ALDS

Name Nomam Khan Age 25yrs Sex M Date 27-7-2014

Clinical Record

C/o

Pain RHC

Nausea / Vomiting

Fever low Grade

Yellowish discoloration of the Sclera / Skin

Bleeding from the Nose, Gums and Bleeding per Rectum.

DE Temp = 101 F

Pap = 110/70

Chest: Rt Side Crepts

CVS - Clear Investigation

HBV DNA Positive

Chronic Hepatitis B

Thrombocytopenia

→ 1/2 Cammula 20G

→ Transfuse Fresh Frozen plasma

→ inj Vit K 1w B.D. for five days.

→ Syp Lilae 2 TSP TDS

→ Syp Lysovit 2 TSP Before meal

→ Tab Silliver 1x TDS

→ Tab Zantac 150mg 1x B.D

- Complete Bed Rest up to two months and patient will be reviewed after two months

27-7-2015

Contact:

0932 - 415335

سرحد سیدیکل سنٹر بالمقابل ایمر جنسی گیٹ ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بٹ خیلہ



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Sarhad Medical Center Batkhela

OPP: Emergency D.H.Q. Hospital Batkhela MKD

Phone # 0932-415335

**Patient Name** Noman Khan

**Age / Sex** NA / Male

**Refered by** Dr Naveed Alam Sb

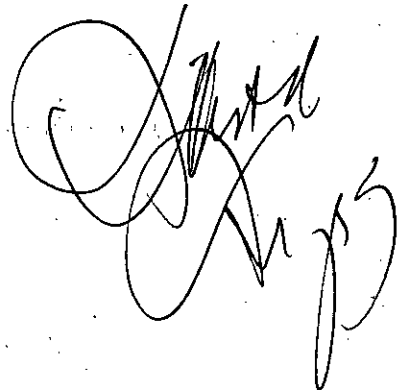
**Specimen** Blood

**Request** PT,APTT

**Date** 27-07-2014

Test	Result
PT	56ec
PT Control	14 Sec
APTT	74sec
APTT Control	36 Sec

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The test.  
→ T3, T4, Tsh, Cardiac Enzyme, Lipids Profile, ( HBs Ag ,HCV Ab By **Elisa** Method ) Are Available at this lab.





Sarhad Medical Center Batkhela

OPP: Emergency D.H.O. Hospital Batkhela MKD

Phone # 0932-415335

14

Patient Name: Noman Khan

Age / Sex: NA / Male

Referral by: Dr Naveed Alam Sb

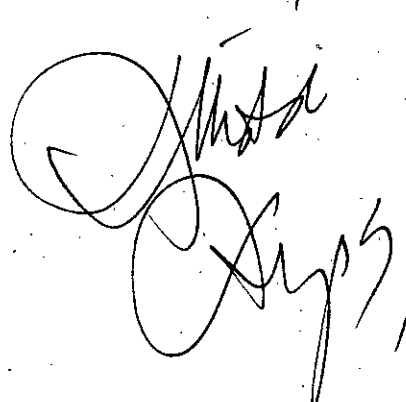
Specimen: Blood

Request: FBC, Platelets Count.

Date: 27-07-2014

Test	Result	Exp. Value
HB	8.6 gm/dl.	M: 14.0 - 18.0 F: 12.0 - 16.0
TLC	7,100 /Cmm	4,000 - 11,000
Platelets Count:	18000 /Cmm	1,50,000 - 3,00,000
<b>Differential Count:-</b>		
Neutrophils	54 %	40 - 70 %
Lymphocytes	39 %	20 - 40 %
Monocytes	06 %	02 - 07 %
Eosinophils	01 %	01 - 06 %

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.  
→ T3, T4, Tsh, Cardiac Enzyme, Lipids Profile, ( HBs Ag, HCV Ab By Elisa Method ) Are Available At This Lab.



Sarhad Medical Center Batkhela

OPP: Emergency D.H.O. Hospital Batkhela MKD

Phone # 0932-415335

Patient Name: Noman Khan

Age/Sex: NA / Male

Referred by: Dr Naveed Alam Sb

Specimen: Blood

Request: HBs Ag, Anti HCV Ab

Date: 27-07-2014

Screening Test.

HBs Ag :- Chromatographic Immunoassay Test For Qualitative Detection Of Hepatitis " B " Surface Antigen Found Reactive.

HCV Ab :- Chromatographic Immunoassay Test For Qualitative Detection Of Antibody to Hepatitis " C " Ab Found Non-Reactive.

Impression:-

HBs Ag                      Reactive  
HCV Ab                      Non Reactive.

Remarks:- Please Confirm By Elisa or PCR.

- If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.
- T3, T4, Tsh, Cardic Enzyme, Lipids Profile, ( Hbs Ag , Hcv Ab By Elisa Method ) Are Available At This Lab.

16

Sarhad Medical Center Batkhela

OPP: Emergency D.H.Q. Hospital Batkhela MKD

Phone # 0932-415335

Patient Name: Noman Khan

Age / Sex: NA / Male

Referring Dr: Dr Naveed Alam Sb

Specimen: Blood

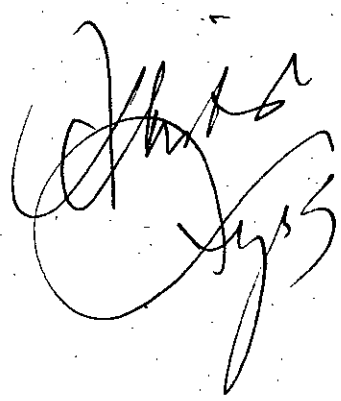
Request: SGPT

Date: 27-07-2014

Test	Result	Exp: Value
S.GPT/ALT	1370 U/l	Up To 40

- > If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The test
- > T3, T4, Tsh, Cardic Enzyme, Lipids Profile, ( Hbs Ag, Hcv Ab Elisa Method ) Are Available At This Lab.

Signature



17

Sarhad Medical Center Batkhela

OPP: Emergency D.H.Q. Hospital Batkhela MKD

Phone # 0932-415335

Patient Name: Noman Khan

Age / Sex: NA / Male

Referred by: Dr Naveed Alam Sb

Specimen: Blood / Urine

Request: ESR, Urine R/E

Date: 27-07-2014

Test	Result	Exp: Value
ESR	68 mm 1st Hour	2 - 15

URINE R/EXAM:  
 Physical Character:- Color P-Yellow  
 Chemical Examination  
 Reaction Acidic ( PH-6 )  
 Albumin Nil  
 Sugar Nil  
 Microscopic Examination.

Pus Cells.....20 - 25 /HPF. RBCs..... 6 - 8 /HPF. Epith Cells... Nil /HPF.

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.  
 → T3, T4, Tsh, Cardic Enzyme, Lipids Profile, ( Hbs Ag, Hcv Ab By Elisa Method ) Are Available At This Lab.

General Physician

Dr. Naveed Alam

M.B.B.S R.M.P. (Pesh)

M.R.C.P-1 (UK)

Medical Officer

D.H.Q Hospital Batkhela



18

جنرل فزیشن

ڈاکٹر نوبید عالم

Cell: 0333-9501250

ایم. بی. بی. ایس۔ آر. ایم. پی (پشاور)

ایم. آر. سی. پی 1 (یو کے)

Name: Noman Khan (ALD) Age: 25 Yrs Sex: M Date: 1-10-2014

Clinical Record

C/o

Cough Chronic Type

Night sweats

Fever low Grade

Tiredness

Weight loss

D/E Anemia ++

Temp = 100 F

Chest + Bil Crepts

CVS S<sub>1</sub> + S<sub>2</sub> + 0

FBC

ESR

Sputum for AFB

SGPT

TB by ICI method

Chest X-ray

Urine R/E

Chronic Hepatitis B  
Pulmonary TB  
LRTI

WT = 50 Kg

Rx ① Tab Myoin - P  
گولیاں 3 مرتبہ روزانہ 1 سے 3

② Tab Nixaf 550

③ Syp Adalin TDS  
2 TDS

④ Tab Hepatovit 1+1

⑤ Tab Diagesic - P ②  
1+1

Complete Bed Rest up to three months only

Flu S  
1-10-15

Contact: 0932 - 415335

سرحد میڈیکل سنٹر یا نقابل ایمر جنسٹیو گیٹ ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بٹ خیلہ



Handwritten signature of the doctor.

19

Sarhad Medical Center Batkhela

OPP: Emergency D.H.O. Hospital Batkhela MKD

Phone # 0932-415335

Patient Name: Noman Khan

Age / Sex: NA / Male

Referred by: Dr Naveed Alam Sb

Specimen: Blood

Request: ESR, FBC

Date: 01-10-2014

Test	Result	Ex: Value
ESR	98 mm	1st Hour 2 - 15
HB	11.7 gm/dl.	M; 14.0 - 18.0 F; 12.0 - 16.0
TLC	13,900 /Cmm	4,000 - 11,000
<i>Differential Count:-</i>		
Neutrophils	26 %	40 - 70 %
Lymphocytes	68 %	20 - 40 %
Monocytes	04 %	02 - 07 %
Esinophils	02%	01 - 06 %

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.

→ T3, T4, Tsh, Cardic Enzyme, Lipids Profile, ( HBs Ag, HCV Ab By Elisa Method ) Are Available At This Lab.

20

Sarhad Medical Center Batkhela

OPP: Emergency D.H.Q. Hospital Batkhela MKD

Phone #, 0932-415335

**Referral Name**

Noman Khan

**Age Sex**

NA / Male

**Referred By**

Dr Naveed Alam Sb

**Specimen**

Sputum

**Request**

Sputum

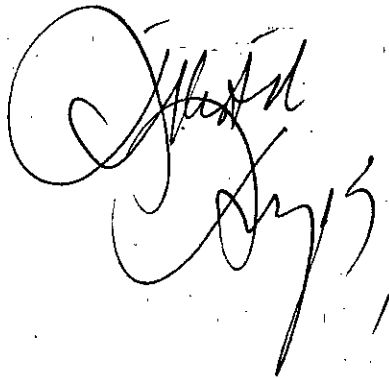
**Date**

01-10-2014

Test	Result
<u>Zn Stain:-</u> Sputum For A.F.B	A.F.B Seen

**Remarks:-** Sputum for A.F.B 2+ Positive.

- If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The
- Test. T3, T4, Tsh, Cardiac Enzyme, Lipids Profile, ( Hbs Ag , Hcv Ab By **Elisa** Method ) Are Available At This Lab.



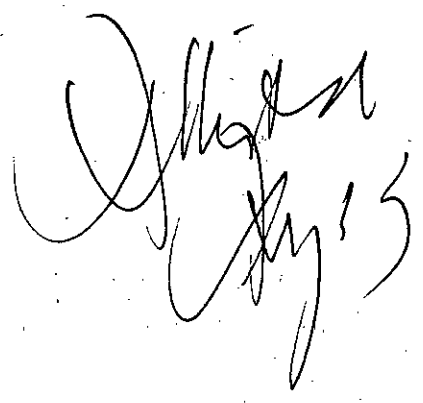
21

Sarhad Medical Center Batkhela  
Opp. Emergency D.H.Q Hospital Batkhela  
Phone:0932-415335

Patient Name: Noman Khan      Age Sex: NA / Male  
Referring Dr: Dr Naveed Alam Sb      Specimen: Blood  
Request: I.C.T (T.B) IgM,IgG.      Date: 01-10-2014

Test	Result
I.C.T (T.B)	
IgM	positive.
IgG	Positive.

→ If Our Result Does Not Corelate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The test  
→ T3,T4,Tsh, Cardic Enzyme,Lipids Profile,( Hbs Ag ,Hcv Ab By Elisa Method ) Are Available At This Lab.



Handwritten signature and date: 13/10/14



Sarhad Medical Center Batkhela

OPP: Emergency D.H.O. Hospital Batkhela MKD

Phone # 0932-415335

Patient Name: **Noman Khan**

Age / Sex: **NA / Male**

Referred by: **Dr Naveed Alam Sb**

Specimen: **Blood / Urine**

Request: **SGPT, Urine R/E**

Date: **01-10-2014**

Test	Result	Expt. Value
S.GPT/ALT	976 U/l	Up To 40

URINE R/EXAM:

Physical Examination:- Color P - Yellow

Chemical Examination

Reaction Acidic ( PH-06 )

Albumin Nil

Sugar Nil

Microscopic Examination.

Pus Cells...4 - 6 /HPF. RBC...Nil /HPF. Epith Cells...Nil /HPF.

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.

→ T3, T4, Tsh, Cardiac Enzyme, Lipids Profile, ( Hbs Ag, Hcv Ab By Elisa Method ) Are Available At This Labs

General Physician

Dr. Naveed Alam

M.B.B.S R.M.P. (Pesh)

M.R.C.P-1 (UK)

Medical Officer

D.H.Q Hospital Batkhela



جزل فریشن  
ڈاکٹر نَوید عالم

Cell: 9333-9501250

ایم، بی، بی، ایس۔ آر، ایم، پی (پشاور)  
ایم، آر، سی، پی 1 (یو کے)

Name: Noman Khan Age: 25 years Sex: M Date: 5-1-2015

Clinical Record

Go  
Productive  
Cough  
Fever Hg  
Nausea  
SOB.  
O/E Chest: Bil  
Rhonchi  
Cxs - 4/2/2  
Ct soft

Ch-Hepatitis B  
Wt = 56 kg  
All pulmonary TB  
Pneumonia

Rx: Tab Myoin  
④  
Tab larith 500  
W 10  
Syp Bresol 2 # SF TDS  
Cap Hepto com 1x TDS  
Tab Zontac 150 1x B/D

Investigation

FBC  
+ platelets  
Count  
Sept  
Urine R<sub>e</sub>  
ESR  
mp  
Chest X-ray

The patient is advised to  
take a bed Rest up to three  
months only.

*[Signature]*  
5-1-2015

Contact: 0932 - 415335

سرحد میڈیکل سنٹر بالقابل ایمر جنسی گیت ڈسٹرکٹ ہیڈ کوارٹرز پشاور  
*[Signature]*

Sarhad Medical Center Batkhela

OPP: Emergency D.H.O. Hospital Batkhela MKD.

Phone # 0932-415335

24

Patient Name: Noman Khan

Age: Sex: NA / Male

Referring Dr: Dr Naveed Alam Sb

Specimen: Blood

Request: FBC, Platelets Count.

Date: 05-01-2015

Test	Result	Exp. Value
HB	10.3 gm/dl.	M; 14.0 - 18.0 F; 12.0 - 16.0
TLC	17,100 /Cmm	4,000 - 11,000
Platelets Count:	50,000 /Cmm	1,50,000 - 3,00,000
<b>Differential Count:-</b>		
Neutrophils	33 %	40 - 70 %
Lymphocytes	62 %	20 - 40 %
Monocytes	04 %	02 - 07 %
Eosinophils	01 %	01 - 06 %

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.

→ T3, T4, Tsh, Cardiac Enzyme, Lipids Profile, ( HBs Ag, HCV Ab By Elisa Method ) Are Available At This Lab.

25

# Sarhad Medical Center Batkhela

OPP: Emergency D.H.Q. Hospital Barkhela MKD.

Phone # 0932-415335

**Patient Name** Noman Khan

**Age / Sex** NA/ Male

**Referred By** Dr Naveed Alam Sb

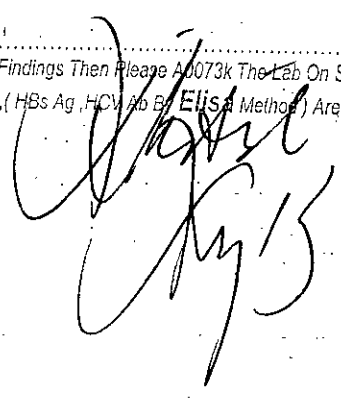
**Specimen** Blood

**Requies** S.GPT,MP

**Date** 05-01-2015

Test	Result	Expt. Value
S.GPT/ALT	573 U/l	Up To 40
MP ( Haemoparasites )	No Mp Seen	

→ If Our Result Does Not Correlate Clinical Findings Then Please Advise The Lab On Same Day To Repeat The Test.  
→ T3, T4, Tsh, Cardic Enzyme, Lipids Profile, ( HBs Ag, HCV, Ab B, ELISA Method ) Are Available At This Lab.



26

# Sarhad Medical Center Batkhela

OPP: Emergency D.H.Q. Hospital Batkhela MKD

Phone #: 0932-415335

Patient Name: Noman Khan

Age / Sex: NA / Male

Referred by: Dr Naveed Alam Sb

Specimen: Blood / Urine

Request: ESR, Urine R/E

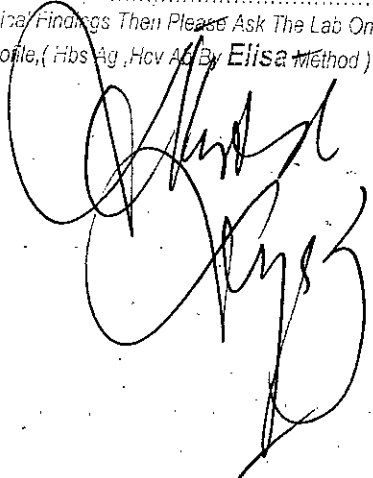
Date: 05-01-2015

Test	Result	Exp:Value
ESR	47 mm 1st Hour	2 - 15

URINE R/EXAM:  
 Physical Character:- Color P-Yellow  
 Chemical Examination  
 Reaction Acidic ( PH-6 )  
 Albumin Nil  
 Sugar Nil

Microscopic Examination.  
 Pus Cells...4 - 6 /HPF. RBCs..... Nil /HPF. Epith Cells...Nil /HPF.

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.  
 → T3, T4, Tsh, Cardiac Enzyme, Lipids Profile, ( Hbs Ag, Hcv Ag By Elisa Method ) Are Available At This Lab.



General Physician

Dr. Naveed Alam

M.B.B.S R.M.P. (Pesh)

M.R.C.P-1 (UK)

Medical Officer

D.H.Q Hospital Batkhela



جنرل فزیشن

ڈاکٹر نوبید عالم

Cell: 0333-9501250

ایم، بی، بی، ایس آر ایم، پی (پشاور)

ایم، آر سی، پی 1 (یو کے)

Name: Noman Khan (A/D) 25 years Age Sex: M Date: 12-06-2015

Clinical Record

FITNESS CERTIFICATE

I have examined Noman Khan properly. He is not suffering from any heart, lung or kidney diseases. There is no any deformity of the limbs or organs of the body. He has completed all the treatment for hepatitis B and pulmonary Tuberculosis. Now he is well efficient and his health condition is satisfactory. He is eligable and fit for his job now.

Investigation

Yours Sincerely  
Dr Naveed Alam

Signature and date: 12-6-15

Contact: 0932 - 415335

سرحد میڈیکل سنٹر بالمقابل ایمر جنسی گیسٹ ہسپتال کوٹلی ہسپتال اور ڈیپارٹمنٹ ہسپتال بٹ خیلہ

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General Physician

Dr. Naveed Alam

M.B.B.S R.M.P. (Pesh)

M.R.C.P-1 (UK)

Medical Officer

D.H.Q Hospital Batkhela



جنرل فزیشن

ڈاکٹر نواب عالم

Cell: 0333-9501250

ایم، بی، بی ایس آر ایم، پی (پشاور)

ایم، آر سی، پی 1 (یو کے)

Name: Noman Khan Age: 25 years Sex: M Date: 11-4-2015

Clinical Record

Go

K/K Ch Hepatitis B

H/o pulmonary TB

Completed ATT

Now come for follow up

Generalized weakness

Appetite & ed

Nausea

Pinkish spots

in all over the body

O/E Pop-110/70

Chest X-ray Temp-99F

Investigation

FBC / ESR

Sputum for AFB

PT, APTT

SGPT

Urine Re

Rx -> Tab Epubram 1XB.D

-> Lab Optilets-M 1XOD

- Cap Evion 400mg 1XOD

-> Cap Esvion 400mg 1XOD

-> Tab Delta cortil 5mg 1XB.D for Fifteen days

NOTE Bed Rest up to two months only.

Signature and Date: 11-4-2015

Contact: 0932 - 415335

سرحد میڈیکل سنٹر بالاقابل ایمر جنسی گیت ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بٹ خیلہ



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Sarhad Medical Center Batkhela

OPP: Emergency D.H.O. Hospital Batkhela MKD

Phone #: 0932-415335

Patient Name: Noman Khan

Age/Sex: NA / Male

Referral: Dr Naveed Alam Sb

Specimen: Blood

Request: ESR, FBC

Date: 11-04-2015

Test	Result	Ex: Value
ESR	20 mm	1st Hour 2 - 15
HB	12.2 gm/dl.	M; 14.0 - 18.0 F; 12.0 - 16.0
TLC	6,900 /Cmm	4,000 - 11,000
Differential Count:-		
Neutrophils	72 %	40 - 70 %
Lymphocytes	22 %	20 - 40 %
Monocytes	04 %	02 - 07 %
Esinophils	02%	01 - 06 %

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.  
 → T3, T4, Tsh, Cardic Enzyme, Lipids Profile, (HBs Ag, HCV Ab By Elisa Method) Are Available At This Lab.



Sarhad Medical Center Batkhela

30

OPP: Emergency D.H.Q. Hospital Batkhela MKD

Phone # 0932-415335

**Patient Name** Noman Khan

**Age / Sex** NA / Male

**Referring Doctor** Dr Naveed Alam Sb

**Specimen** Sputum

**Request** Sputum for AFB.

**Date** 11-04-2015

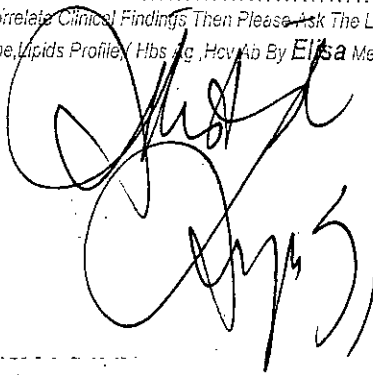
Test Result

Zn Stain:-

Sputum for A.F.B

No AFB Seen. /100 HPF.

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The test  
→ T3, T4, Tsh, Cardic Enzyme, Lipids Profile ( Hbs Ag, Hcv Ab By Elisa Method ) Are Available At This Lab.



31

### Sarhad Medical Center Batkhela

OPP: Emergency D.H.Q. Hospital Batkhela MKD

Phone # 0932-415335

**Patient Name** Noman Khan

**Age / Sex** NA / Male

**Referred By** Dr Naveed Alam Sb

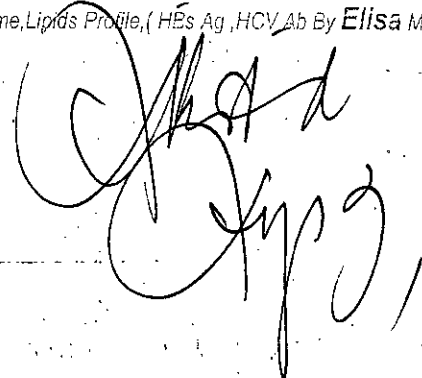
**Specimen** Blood

**Request** PT,APTT

**Date** 11-04-2015

Test	Result
PT	17 Sec
PT Control	14 Sec
APTT	39 Sec
APTT Control	36 Sec

- > If Our Result Does Not Correlate Clinical Findings Than Please Ask The Lab On Same Day To Repeat The test.
- > T3,T4,Tsh,Cardic Enzyme,Lipids Profile,( HBs Ag ,HCV Ab By **Elisa** Method ) Are Available at this lab.



32

Sarhad Medical Center Batkhela

OPP: Emergency D.H.Q. Hospital Batkhela MKD

Phone #: 0932-415335

Patient Name: Noman Khan

Age: NA / Male

Referred By: Dr Naveed Alam Sb

Specimen: Blood / Urine

Reqs: SGPT, Urine R/E

Date: 11-04-2015

Test	Result	Expt. Value
S.GPT/ALT	39 U/l	Up To 40

URINE R/EXAM:

Physical Examination:- Color P - Yellow

Chemical Examination

Reaction Acidic ( PH-06 )

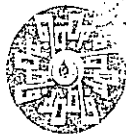
Albumin Nil

Sugar Nil

Microscopic Examination:

Pus Cells...2 - 3 /HPF. RBC...Nil /HPF. Epith Cells...Nil /HPF.

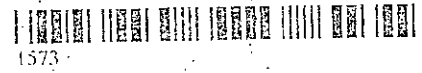
→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.  
 → T3, T4, Tsh, Cardiac Enzyme, Lipid Profile, Hcg, Hba1c, Hicr Ab, By Elisa Method ) Are Available At This Labs



33

FML No. : PO-10-10-00060  
Pat. Name : NOUMAN  
Refer By : DR NOOR UL IMAN  
Specimen : serum

Age / Sex : 20 years / Male  
Contact :  
Order Date : 23 Oct 2010  
Report Date : 04 Nov 2010



**Immunology**

Test	Value	Reference Value
Anti HDV IgG/IgM	Negative (0.914)	Negative: > 0.455 Gray Zone: 0.35 - 0.455 Positive: < 0.35

Electronically Signed Report.

Footer02

Person ID

04/11/2010 01:01 PM

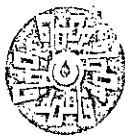
1/2

Real-Time PCR, Histopathology, Cytopathology, Hematology, Microbiology, Chemical Pathology, Immunology, Endocrinology, Viral Markers, Drug Monitoring

COLLECTION CENTER  
Rescue - 15  
G-8/4 Islamabad

**INCORRECT RESULT**  
Please feel free to call within 48 hours  
for a free repeat of any blood test

This report is solely based on the sample received and needs clinical correlation.  
The referring physician may contact reporting pathologist for detailed discussion.  
Not valid for court use.  
Web : [www.fatimalabs.com](http://www.fatimalabs.com) E-mail: [info@fatimalabs.com](mailto:info@fatimalabs.com)

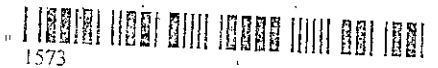


34

FML No. : PO-10-10-00060  
Pat. Name : NOUMAN  
Refer By : DR NOOR UL IMAN  
Specimen : serum

Age / Sex : 20 years / Male  
Contact :  
Order Date : 23 Oct 2010  
Report Date : 04 Nov 2010

**Immunology**



Genotyping Hep B  
Genotyping

**Interpretation**

HBV GENOTYPE "D"

**METHODOLOGY:**

DNA extracted from 200µl of serum and was subjected to two rounds of PCR amplification with nested pairs of primer. The 1<sup>st</sup> round utilized the outer primers specific for the PreS1 & S regions of HBV genome. The 2<sup>nd</sup> round was performed with one universal inner-sense and genotype-specific anti-sense primers. The amplified specific target sequence for particular genotypes was detected by agarose gel electrophoresis.

**COMMENTS:**

Presently, HBV can be classified into eight (A-H) major genotypes and a series of subtypes. Different hepatitis B virus (HBV) genotypes are associated with different profiles of pathogenicity, infectivity, and response to antiviral therapy (Kao et al., 2002 *Hepatology* 17:643-650). HBV genotype C has been associated with Hepatocellular carcinoma (Orito et al., 2001 *Hepatology* 34:590-594) and genetic recombination with this genotype might render genotype B strains more pathogenic and more carcinogenic. Genotypic effects on the treatment response shows that genotype B is associated with better response to interferon compared with genotype C while patients with genotype D have a lower response rate to Interferon compared with genotype A. Genotype D is the most widely distributed genotype and has been found universally but predominates in the Mediterranean area. Genotype A infected patients responded better to Interferon treatment than those infected with genotype D or E (Zhang et al., 1996)

Electronically Signed Report.

Footer02

Person ID

04/11/2010 01:01 PM

2/2

Real-Time PCR, Histopathology, Cytopathology, Hematology, Microbiology, Chemical Pathology, Immunology, Endocrinology, Viral Markers, Drug Monitoring

COLLECTION CENTER - COLLECTION CENTER  
Rescue - 5  
3-8/4 Islamabad

**INCORRECT RESULT**  
Please feel free to call within 48 hours  
for a free repeat of any blood test

This report is solely based on the sample received and needs clinical correlation.  
The referring physician may contact reporting pathologist for detailed discussion.  
Not valid for court use.  
Web : www.fatimalabs.com E-mail: info@fatimalabs.com

35

Dr. Naveed Alam  
M.B.B.S R.M.P. (Pesh)



ڈاکٹر نوید عالم

Exf: House Physician & Surgeon  
Khyber Teaching Hospital  
Peshawar.  
Contact No: 0932-415335  
Mob: 0301-8064079

کلینک: حراء میڈیکوز  
بلقائل ایمر جنسی گیٹ ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بٹ خیلا

ایم۔بی۔بی۔ایس  
آر۔ ایم۔ پی (پشاور)  
ایکس۔ ہاؤس فزیشن اینڈ سرجن  
خیبر ٹیچنگ ہسپتال پشاور

Name Nauman Age 27 Sex M Add Alladomd Date 26/2/10

Clinical Record

Rx

⊕  
K/C Hbs Ag

No active Complaints

Other GPE ⇒ Normal

Systemic Examination

- CNS
  - CVS
  - Chest
  - GIT
- } (N/A)

Investigation

→ SGPT

*[Handwritten signature]*

R  
① Cap Liv - 5g - DS  
1 + 1

② Tab Optilets - m

بجائے 3 گولیوں ①

3 Tab Alp 0.25mg

ob ① کو = 3 گولیوں ①

Dr. A. S.

26/2/10.

36



# AL. IBRAHIMI LABORATORIES

For Precision & Quality

Date: 10/24/2010 6:33:20 AM

Patient Name: NOUMAN  
Specimen:

Test Order ID: 93591  
Lab #: 64

Age / Sex: 20 Years Male  
Referred By: Dr. Noor Ul Iman

## FBC

Test #: 319

	Result	Unit	Normal Value	Remarks
Haemoglobin	12.0	g/dl	14-18	Low
TLC	9700	/mm	4000-11000	Normal
<b>DIFFERENTIAL COUNT</b>				
Neutrophils	62		40-70	Normal
Lymphocytes	36		20-40	Normal
Eosinophils	02		01-06	Normal
Monocytes	00		02-10	Low

Lab Incharge

INCORRECT RESULT? Please Call laboratory within 24hours for a FREE REPEAT of any,one BLOOD TEST from this sample

MAIN LABORATORY: AL.Ibrahim Hospital, Dabgari Garden, Peahawar, Pakistan.

Tel:0092-91-2212799-2565776-2567448/9, Fax: 0092-91-2567446 E-mail: iht2002@hotmail.com, web:www.Webx/Iht.com



37

ID: 000000064

10-21-10

WB

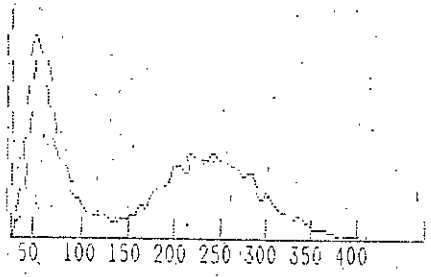
15:34

Patient

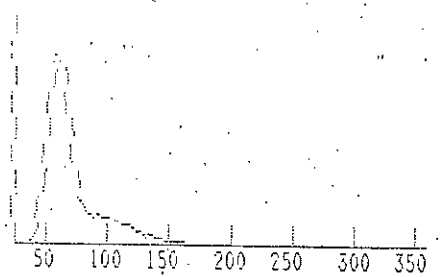
Limits 3

WBC	9.7	x10 <sup>3</sup> /UL	4.5	10.5
LY	36.8	%	20.5	51.1
MO	0.8	ML %	1.7	9.3
GR	62.4	M %	42.2	75.2
LY#	3.6	H x10 <sup>3</sup> /UL	1.2	3.4
MO#	0.1	M x10 <sup>3</sup> /UL	0.1	0.6
GR#	6.1	M x10 <sup>3</sup> /UL	1.4	6.5
RBC	6.42	XH x10 <sup>6</sup> /UL	4.00	6.00
Hgb	12.0	g/dl	11.0	18.0
Hct	39.4	X %	35.0	60.0
MCV	61.4	XL fL	80.0	99.9
MCH	18.7	XL pg	27.0	31.0
MCHC	30.4	XL g/dL	33.0	37.0
RDW	16.8	XH %	11.6	13.7
PIT	338	X x10 <sup>3</sup> /UL	150	450
MPV	7.6	XL fL	7.8	11.0

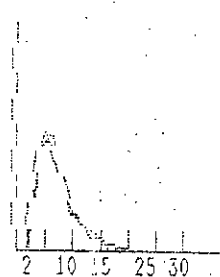
N 62 %  
 L 36 %  
 E 02 %



WBC HISTOGRAM



RBC HISTOGRAM



PLT HISTOGRAM

*Handwritten signature:*  
 [Signature]

38



# AL. IBRAHIMI LABORATORIES

Consultant and Hematologist

*Dr. Saad Zaid*

M.D. (HISTOLOGY),  
M. PH. (HEMATOLOGY)  
Pathologist

Date: 10/24/2010 6:33:22 AM

For Precision & Quality

Patient / Name: NOUMAN  
Specimen: Blood

Test Order ID: 93591  
Lab #: 64

Age / Sex: 20 Years Male  
Referred By: Dr. Noor Ul Iman

## Prothrombin Time

Test #: 406

	Result
Patient	20 Second
Control	14 Second
INR	1.51

Lab Incharge

INCORRECT RESULT? Please Call laboratory within 24hours for a FREE REPEAT of any one BLOOD TEST from this sample

MAIN LABORATORY: AL.Ibrahimi Hospital, Dabgari Garden, Peahawar, Pakistan.

Tel: 0092-91-2212799-2565776-2567448/0, Fax: 0092-91-2567446 E-mail: iht2002@hotmail.com, web: www.Web:/iht.com

39



# AL. IBRAHIMI LABORATORIES

Consultant Microbiologist  
*Dr. Hafsa Zahid*  
M.D. (M.C.P.S.)  
M. Phil. (Microbiology)  
Pathologist

Date: 10/21/2010 6:33:24 AM

For Precision & Quality

Patient Name: NOUMAN  
Specimen: Blood

Test Order ID: 93591  
Lab #: 64

Age: 20 | Sex: Male  
Referred By: Dr. Noor Ul Iman

### LFT

Test #: 035

	Result	Unit	Normal Value	Remarks
T. Bilirubin	0.6	mg/dl	0.2 - 1	Normal
Sgpt (ALT)	50	U/L	(Upto) 45	High
Alkaline Phosphatase	110	U/L	65-306	Normal

Lab Incharge

INCORRECT RESULT? Please Call laboratory within 24 hours for a FREE REPEAT of any one BLOOD TEST from this sample.

MAIN LABORATORY: AL. Ibrahim Hospital, Dabgari Garden, Peahawar, Pakistan.

Tel: 0092-91-2212799-2565776-2567440/9, Fax: 0092-91-2567446 E-mail: iht2002@hotmail.com, web: www.Webx/lht.com

40



# AL. IBRAHIMI LABORATORIES

Dr. Noman A. Zahid  
M.D., M.C.P.  
F.C.P. (Haematology)  
Pathologist

For Precision & Quality

Date: 10/21/2010 6:33:26 AM

Patient/Name: NOUMAN

Test Order ID: 93591  
Lab #: 64

Page # 1  
Age / Sex: 20 Years Male  
Referred By: Dr. Noor Ul Iman

## Urea

Test #: 007  
Specimen: Blood

Result	Unit	Normal Value	Remarks
16	mg/dl	10 - 50	Normal

## Creatinine

Test #: 008  
Specimen: Blood

Result	Unit	Normal Value	Remarks
0.6	mg/dl	0.6 - 1.1	Normal

Lab Incharge

INCORRECT RESULT? Please Call laboratory within 24hours for a FREE REPEAT of any one BLOOD TEST from this sample

MAIN LABORATORY: Al. Ibrahim Hospital, Dabgari Garden, Peahawar, Pakistan.

Tel. 0092-91-2212799-2565776-2567448/9, Fax: 0092-91-2567446 E-mail: iht2002@hotmail.com, web: www.Webx/lht.com

# Fida Ultrasound Clinic

41

Dr Fida Mohammad

Clinic

MBBS, FCP(S)  
Registrar Radiology & Imaging Deptt:  
Khyber Teaching Hospital Peshawar

Opposite Mumtaz Surgical Hospital  
Near Alfalah Medical Centre  
Dabgari Garden Peshawar

Patient's Name: -Nauman

Phone

0300-5923778

Ref By: Prof Dr Noor ul Iman Physician & Gastroenterologist

Reported on Thursday, October 21, 2010

Liver is normal in size, shape, margins & parenchymal echopattern.  
No focal pathology.  
(Cephalo-caudal diameter in mid-clavicular line = 118 mm).

Portal (10 mm) vein is normal in diameter. No thrombus is seen.  
Portal vein blood flow is 14 cm/s on doppler study.

Spleen is normal in size & tissue.  
It measures 098 mm in cephalo-caudal diameter.

Gall bladder shows normal wall texture, cavity and volume.  
Normal C.B.D.

Pancreas is normal in shape, size and tissue texture.

Diaphragm, IVC, Aorta and pelvic vessels are normal.

Kidneys are normal in size, cortices and collecting systems.  
No hydronephrosis.  
Normal urinary bladder.

Normal intestinal lumen caliber, wall texture and peristalsis.

No enlarged lymph nodes.

No ascites.

Normal Ultrasound Study

Dr Fida Mohammad

42



The Biotech  
Medical Laboratories & Research Center

House # 341 Ravi Road  
G8-2 Islamabad.  
Tel # 92-51-9320160  
Mob:0344-9108741

BMLRC No.	<b>5667/B</b>	Age	<b>20 Years</b>	Sex	<b>Male</b>
Name	<b>Nauman</b>	Contact	-	Reporting Date	<b>02/04/09</b>
Referred by	<b>Dr.Khalid Hameed</b>	Blood		Receiving Date	<b>26/03/09</b>

Request **HBV DNA QUANTIFICATION**

Interpretation	<b>9.3 × 10<sup>6</sup> (9322001) IU/ml</b>
----------------	---------------------------------------------

**Method (Mini Opticon-Bioered RT-PCR)**

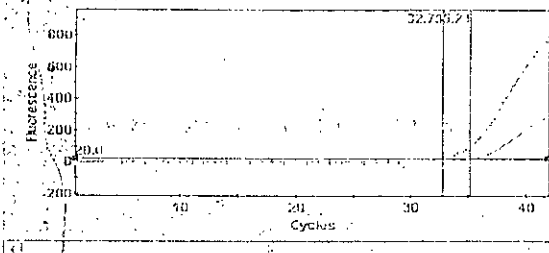
HBV DNA was extracted from patient plasma and amplified by Real-Time PCR. Amplification and detection was carried out simultaneously by Mini Opticon-Bioered RT-PCR the world's real-time thermo-optical analyser using kits from Roboscreen.

Positive, Negative & Internal Controls were applied

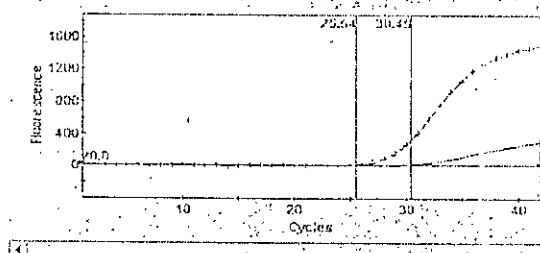
**Comments**

By using Real-Time PCR, we developed & evaluated a rapid, sensitive, specific and reproducible method for the detection and quantification of Hepatitis B Virus (HBV) DNA in Plasma. This method allowed us to screen plasma & Serum Samples over a range 3.8 IU/ml to 4x10<sup>9</sup> IU/ml

**Graph**



Patient Sample



Positive Control

Muhammad Jamil  
Molecular Biologist

Note: The results can only be compared with the laboratories using state of the art CEPHEID SMART CYCLER © II and the specified kits

Electronically verified report requires no signature

Real-Time PCR, Histopathology, Cytopathology, Hematology, Microbiology, Chemical Pathology, Immunology, Endocrinology, Vira. Markers, Drug Monitoring

SUB CENTER G-80 Auqaf Plaza, Shamsi Road Dabgari Garden, Peshawar Tel & Fax: 091-2581553 Mob:0300-5989421	SUB CENTER AL-Hamza Clinical Laboratory Main Gate D.H.Q Hospital Swabi Tel:0938-224221	SUB CENTER Sahara Welfare Hospital-Swabi Tel:0946-721275	SUB CENTER Kohat Medical Laboratory Modern Shopping Center Flat #19 Tel:022-377228	Please feel free to call within 48 hours for a free repeat of any blood test	This report is solely based on the sample received and needs clinical correlation The referring physician may contact reporting pathologist for detailed discussion Not valid for court use E-mail:medicallaboratories@yahoo.com
--------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------	-------------------------------------------------------------------	------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

43



The Biotech  
Medical Laboratories & Research Center

House # 341 Ravi Road  
G8-2 Islamabad.  
Tel # 92-51-9320160  
Mob:0344-9108741

Patient's Name :	Nauman	Age :	20 Yrs.	Sex :	Male
Report No :	5667/B	Ref By :	Dr.Khalid Hameed		
Receiving Date :	26/03/2009	Reporting Date :	27/03/2009		

**VIROLOGY REPORT**

**HBe Ag :** **Reactive**  
 Cut Off Value: 1.00  
 Patient Value: 391.0

**Anti HBe:** **Non-Reactive**  
 Cut Off Value: 1.00  
 Patient Value: 2.90

Interpretation of results for anti HBe Patient value less than cut off value, result considered reactive. Patient value greater than cut off value, result considered non-reactive.

Consultant Histopathologist  
Professor.Dr.Noor Khan  
M.B.B.S.M.Phil.Ph-D(Histopath)

Consultant Heamotologist  
Dr.Sehar Khaliq  
M.B.B.S,MCPS,FCPS

Consultant Biochemist  
Anwar Ullah  
B.Sc. (M.L.T)  
M.Sc (Bio-Chemist)

*Electronically verified report requires no signature*

Real-Time PCR, Histopathology, Cytopathology, Hematology, Microbiology, Chemical Pathology, Immunology, Endocrinology, Viral Markers, Drug Monitoring

SUB CENTER  
G-80 Augaf Plaza, Shamsi Road  
Dabgari Garden, Mardan.  
Peshawar 0937-870601  
Tel & Fax: 091-2581553.  
Mob:0300-5989421

SUB CENTER  
AL-Hamza Clinical  
Laboratory Main Gate  
D.H.Q Hospital Swabi  
Tel:0938-224221

SUB CENTER  
Sahara Welfare  
Hospital Swat  
Tel:0946-721295

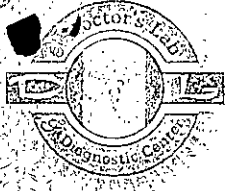
SUB CENTER  
Kohat Medical  
Laboratory Modern  
Shopping Center Flat #19  
Tel:0922-517228

Please feel free to call within 48 hours for a free repeat of any blood test

This report is solely based on the sample received and needs clinical correlation. The referring physician may contact reporting pathologist for detailed discussion  
Not valid for court use

E-mail:medicallaboratories@yahoo.com

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# THE DOCTOR'S LAB & Diagnostic Center

Chinar Building, Railway Line Road,  
Dabgari Gardens, Peshawar City  
Ph: 0092-91-2210646  
Mob: 0092-321-9056491  
E-mail: dldc@yahoo.com

Patient's Name: Mr. Noman  
Age: 20 Years Sex: Male  
Patient's ID: 0663-09 Specimen: Blood  
Receiving Date: 24-Mar-09 Delivery Date: 24-Mar-09  
Ref By: Dr. Khalid Hameed  
Investigation Required: S.G.P.T.

TEST RESULT

TEST	REPORT	UNIT	NORMAL VALUE
S. G. P. T.	37	u/l	0 - 45

Pathologist

This report is solely based on the sample received and needs clinical correlation. The referring physician may contact reporting pathologist for detailed discussion. Not valid for court use.



Prof Noor-ul-Iman

M.B.B.S, M.R.C.P, F.R.C.P(Sin) F.R.C.P(Edin) F.E.B.G.

Fellow European Board of Gastroenterology

Consultant Physician and Gastroenterologist

Professor of Medicine, Khyber Teaching Hospital, Peshawar.

Clinic: 206-B, IBRAHIMI HOSPITAL, DABGARI GARDENS, PESHAWAR. TEL: 091-2566594, 0300-5911832

Naungan

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INTERMAX 6-11

10 @ - 9 @ - 10 @ - 10 @

DARONIL 7-8

10 @

10 @

10 / 11 / 10

کلینک:

۲۰۶- بی، ابراہیمی ہاسپتال اینڈ ٹرسٹ، ڈبگری گارڈنز پشاور

تعطیل بروز ہفتہ، اتوار

Not Valid for Court

پروفیسر ڈاکٹر نور الایمان

میڈیکل سپیشلسٹ از ماہر امراض معده، جگر و اندرون  
پروفیسر آف میڈیسن - خیبر بچنگ ہسپتال پشاور

46

General Physician

Dr. Naveed Alam

M.B.B.S R.M.P. (Pesh)

M.R.C.P-1 (UK)

Medical Officer

D.H.Q Hospital Batkhela



جنرل فزیشن

ڈاکٹر نایب عالم

Cell: 0333-9501250

ایم بی بی ایس آر ایم پی (پشاور)  
ایم آر سی پی 1 (یو کے)

Name Nauman

(ALD)

Age

Sex M

Date 8-11-2012

Clinical Record

Q. HBV DNA

Received Acarix  
6 months

Rx  
1/15 MITS 7.5mg  
1 + 1

Investigation

- 9 Sept
- HBV DNA by PCR method

a Spagal Husk

دیکھو (2)

Cap Evim 400

دیکھو

Handwritten signature

Contact: 0932-415335  
0315-8000577

سرحد میڈیکل سنٹر بالٹکھلا ایمر جنسی گیت ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بالٹکھلا



Handwritten signature at the bottom left

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# SARHAD MEDICAL CENTER

Opposite Emergency D.H.Q Hospital Batkhela Malakand

Ph: 0932-415335 Zahoor Ahmad: 03459374505 Shehzad Ahmad: 03339263166

Sarhad Clinical Laboratory, Ultrasound, E.T.T  
Echo, ECG, X-Ray & Blood Bank.

**Patient Name** Noman

**Age / Sex** NA / Male

**Referred By** Dr Naveed Alam Sb.

**Specimen** Blood

**Refuses** SGPT

**Date** November 8, 2012

Test	Result	Expt. Value
S.GPT/ALT	21 u/l	Up To 40

→ If Our Result Does Not Correlate Clinical Findings Then Please Ask The Lab On Same Day To Repeat The Test.  
 → T3, T4, Tsh, Cardic Enzyme, Lipids Profile, ( Hbs Ag, Hcv Ab By Elisa Method ) Are Available At Tirade Lab

Lab Incharge

**Collection Point:** Shaukat Khanam Laboratory & Research Centre Lahore  
Salman Choghtai Laboratory Lahore

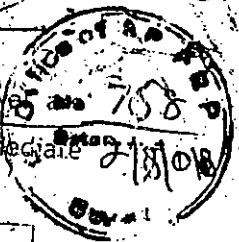
0315-8000577

Annex 'B' 48

263  
18-7-13

ORDER

The following Constables of FRP Khyber Pakhtunkhwa district Swat hereby transferred and posted to regular Police District Swat with immediate effect.



S/No	Name	No	D/O/Enlist
1.	NAWAB GUL	X3634	25/21/1984
2.	AKHTAR GUL	X3935	7/31/1989
3.	JEHAN ZEB	X3670	10/18/1994
4.	FAZAL RAHMAN	X3850	3/4/1995
5.	JAVID KHAN	X3950	3/4/1995
6.	AKHTAR JAN	X3607	4/13/1995
7.	KHISTA RAHMAN	X3936	4/19/1995
8.	FARID GUL	X4138	4/19/1995
9.	ZAIRWAR KHAN	X3513	4/27/1995
10.	JAN MOHAMMAD	X3942	12/6/1995
11.	AJAB KHAN	X3702	7/5/1996
12.	FAROOQ ZADA	X3554	11/11/1996
13.	ISHAQ ALI	X3765	11/15/2003
14.	SHADIQ AKBAR	X3849	11/15/2003
15.	SAJJAD ALI	X3648	2/11/2004
16.	ALI KHAN	X3621	2/11/2004
17.	MUHAMMAD NAEEM	X3990	11/2/2004
18.	ANWAR ZEB	X3762	4/30/2007
19.	RAHIM ULLAH	X3442	4/30/2007
20.	MOHAMMAD ALAM	X3799	4/30/2007
21.	SHER AFZAL	X4415	6/25/2007
22.	RIAZ KHAN	X4459	12/30/2010
23.	AMJAD ALI	X3381	7/25/2007
24.	TAJ MOHAMMAD	X3455	7/25/2007
25.	BAKHTI GUL	X3701	7/25/2007
26.	ABDUR RAHMAN	X3756	7/25/2007
27.	MOHAMMAD ISHAQ	X3782	7/25/2007
28.	AGHAZER ALI	X3783	7/25/2007
29.	MOHAMMAD ANWAR	X3792	7/25/2007
30.	RAFIQ AHMAD	X3795	7/25/2007
31.	FAZAL WAHAB	X3797	7/25/2007
32.	RUSTAM KHAN	X3805	7/25/2007
33.	FAROOQ	X3814	7/25/2007
34.	LIAQAT HUSSAIN	X3815	7/25/2007
35.	DAWOOD KHAN	X3817	7/25/2007
36.	AYAZ ALI	X3824	7/25/2007
37.	NISAR ALI	X3825	7/25/2007
38.	SARDAR ALI	X4152	7/25/2007
39.	AFZAL KHAN	X4158	7/25/2007
40.	UMAR KHAN	X4419	7/25/2007
41.	SHAMSUR RAHMAN	X3753	7/26/2007
42.	BAHADAR ALI	X3806	7/26/2007
43.	ISHAQ	X3680	6/23/2008
44.	NASAR KHAN	X3681	6/23/2008
45.	NAWAB SHAH	X4137	8/7/2008
46.	KHAN MALIK	X3996	11/5/2008
47.	NAVID ISLAM	X3608	11/24/2008

IGP  
 Lt. FRP  
 Sdnt:  
 N.P.  
 BP  
 Range  
 FRP  
 Pesh:  
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My

DO  
 For m/a  
 S/FRP Swat  
 118

127

49

48.	FAZAL QADOS	X4144 ✓	11/24/2008
49. ✓	ABDUL KAMAL	X4143 ✓	12/12/2008
50.	SHARAFAT ALI	X3495 ✓	1/10/2009
51.	MAZ UDDIN	X3764 ✓	1/10/2009
52.	SAM ULLAH	X3763 ✓	1/16/2009
53.	TAWKAL KHAN	X3785 ✓	1/30/2009
54. ✓	SHAHIDURAHMAN	X3916 ✓	2/16/2009
55.	SAJJAD ALI	X3609 ✓	3/10/2009
56.	HUSSAIN KHAN	X3561 ✓	4/9/2009
57.	ASAD HAYAT	X3586 ✓	4/9/2009
58.	NAVEED	X3343 ✓	4/9/2009
59.	IHSAN ULLHA	X3345 ✓	4/9/2009
60.	M. ILYAS	X3348 ✓	4/9/2009
61.	BILAL AHMAD	X3357 ✓	4/9/2009
62.	IMARN KHAN	X3362 ✓	4/9/2009
63.	HAYAT MOHAMMAD	X3363 ✓	4/9/2009
64.	MOHAMMAD IBRAHIM	X3370 ✓	4/9/2009
65.	SHER MOHAMMAD	X3391 ✓	4/9/2009
66.	AKRAM KHAN	X3409 ✓	4/9/2009
67.	GUL ZAR ALI	X3411 ✓	4/9/2009
68.	MOHAMMAD RIAZ	X3432 ✓	4/9/2009
69.	ASIM ULLAH	X3444 ✓	4/9/2009
70.	SHER ULLAH	X3469 ✓	4/9/2009
71.	ALI RAHAMAN	X3517 ✓	4/9/2009
72.	NAEEM	X3518 ✓	4/9/2009
73.	ZAR SHAHD KHAN	X3532 ✓	4/9/2009
74.	FAZAL ADIL	X3553 ✓	4/9/2009
75.	IBRAR HUSSAIN	X3565 ✓	4/9/2009
76. ✓	YAR KHAN	X3575 ✓	4/9/2009
77.	FAZAL ROIDAR	X3656 ✓	4/9/2009
78.	ASFANDIYAR	X3667 ✓	4/9/2009
79.	AYOUB KHAN	X3714 ✓	4/9/2009
80.	AMIR ALAM SHAH	X3463 ✓	7/23/2009
81.	GQHAR ALI	X3420 ✓	8/9/2009
82.	TAWSHIF GUL	X3514 ✓	8/9/2009
83.	RIWAIT KHAN	X3544 ✓	8/9/2009
84.	HABIB ULLAH	X3630 ✓	8/9/2009
85.	ZIARAT KHAN	X3686 ✓	8/9/2009
86.	GULZAR ALI	X3425 ✓	9/1/2009
87.	AMIR SHAHZAD	X3460 ✓	9/8/2009
88.	QAYOM KHAN	X3515 ✓	9/9/2009
89.	NAVED KHAN	X3443 ✓	9/17/2009
90.	SHER BAH	X3500 ✓	9/28/2009
91.	MOHAMMAD RAHMAN	X3590 ✓	10/1/2009
92.	ABUSAEED	X3395 ✓	10/1/2009
93.	AURANG ZEB	X3408 ✓	10/1/2009
94.	ABDULLAH	X3419 ✓	10/1/2009
95.	IMRAN	X3473 ✓	10/1/2009
96.	KHURSAID ALID	X3487 ✓	10/1/2009
97.	NIAMAT ALI	X3499 ✓	10/1/2009
98.	MUZAFAR SHAH	X3534 ✓	10/1/2009
99.	UMER ALI	X3715 ✓	10/1/2009
100.	SADIQAT ALI	X3720 ✓	10/1/2009
101.	HABIBURHAMAN	X3722 ✓	10/1/2009

102	✓	NAJEEB ULLAH	X3741 ✓	10/1/2009
103	✓	QAISAR ALI	X3742 ✓	10/1/2009
104	✓	ABID ALI	X3779 ✓	10/1/2009
105	✓	QASIM JAN	X3787 ✓	10/1/2009
106	✓	NOOR UL HAQ	X3793 ✓	10/1/2009
107	✓	AHMAD ZEB	X3796 ✓	10/1/2009
108	✓	NOWSHERAWAN	X3802 ✓	10/1/2009
109	✓	AKMALKHAN	X3803 ✓	10/1/2009
110	✓	KHISATA BACHA	X3807 ✓	10/1/2009
111	✓	SHAH MAZAL KHAN	X3823 ✓	10/1/2009
112	✓	FAYAZ	X3826 ✓	10/1/2009
113	✓	IMTIYAZ ALI	X4408 ✓	10/1/2009
114	✓	AKBAR ALI	X3685 ✓	10/1/2009
115	✓	MOHAMMAD SAJAD	X3721 ✓	10/1/2009
116	✓	AJAB KHAN	X3760 ✓	10/1/2009
117	✓	IFTIKHAR HUSSAIN	X3761 ✓	10/1/2009
118	✓	ANWAR KHAN	X3775 ✓	10/1/2009
119	✓	HAMRA ALI KHAN	X3808 ✓	10/1/2009
120	✓	SULIMAN SHAH	X4401 ✓	10/10/2009
121	✓	IBRAR ALI	X3475 ✓	10/15/2009
122	✓	SHAHAB ZADA	X3877 ✓	10/21/2009
123	✓	AZIZ UR RAHMAN	X3967 ✓	11/20/2009
124	✓	TARIQ MEHMOOD	X3899 ✓	12/11/2009
125	✓	NAVEED ILLHI	X3441 ✓	12/15/2009
126	✓	MOHAMMAD NABI	X3900 ✓	12/16/2009
127	✓	NAEEM SHAH	X3875 ✓	12/22/2009
128	✓	ISLAM UDDIN	X4135 ✓	1/1/2010
129	✓	MOHAMMAD ISHAQ	X4267 ✓	1/2/2010
130	✓	AMIR RAHMAN	X4204 ✓	1/2/2010
131	✓	IFTIKHAR AHMAD	X4206 ✓	1/2/2010
132	✓	TAHIR ZADA	X4207 ✓	1/2/2010
133	✓	SHAH RASOL	X4208 ✓	1/2/2010
134	✓	TAJ MINIR KHAN	X4210 ✓	1/2/2010
135	✓	ASAD ULLAH	X4221 ✓	1/2/2010
136	✓	ZAHID HUSSAIN	X4238 ✓	1/2/2010
137	✓	ALI HUSSAIN	X4249 ✓	1/2/2010
138	✓	FAZAL MAJID	X4271 ✓	1/2/2010
139	✓	HAZRAT USAMIN	X3788 ✓	1/3/2010
140	✓	SIKANDAR ZAMAN	X4303 ✓	1/3/2010
141	✓	HABIB UR RAHMAN	X3627 ✓	1/3/2010
142	✓	AMAN ULLAH	X4125 ✓	1/13/2010
143	✓	NIK AMAL KHAN	X4134 ✓	1/13/2010
144	✓	ASLAM KHAN	X4155 ✓	1/26/2010
145	✓	ZABIH ULLAH	X3657 ✓	1/29/2010
146	✓	QAYOOM KHAN	X4181 ✓	1/30/2010
147	✓	ZIARAT GUL	X4188 ✓	1/30/2010
148	✓	IRSHAD AKBAR	X4243 ✓	1/30/2010
149	✓	ZIR UR RAHMAN	X4247 ✓	1/30/2010
150	✓	INAYAT UR RAHMAN	X4192 ✓	1/30/2010
151	✓	MUZAM KHAN	X4101 ✓	2/1/2010
152	✓	RIAZ BACHA	X4205 ✓	2/2/2010
153	✓	FAWAD	X4248 ✓	2/2/2010
154	✓	SOHRAB	X4290 ✓	2/2/2010
155	✓	MIAN ADDIL SHAH	X4346 ✓	2/3/2010

57



156	MANSAF KHAN	4139	2/3/2010
157	ZAFAR ALI SHAH	4293	2/3/2010
158	MOHAMMAD IQBAL	4298	2/9/2010
159	IBRAR	4350	2/10/2010
160	SHUKAT ALI	3754	2/13/2010
161	FAZAL ILLAHI	4147	2/13/2010
162	ARSHAD ALI	4317	2/13/2010
163	SHAHID HUSSAIN	4315	2/13/2010
164	FARMAN UDDIN	4325	2/16/2010
165	MOHAMMAD IBRAR	4336	2/16/2010
166	MISAL FARAZ	4308	2/16/2010
167	AKMAL BACHA	3582	2/20/2010
168	NIAMAT KHAN	4314	2/22/2010
169	MOHAMMAD ALI	4341	2/24/2010
170	WISAL	3454	2/26/2010
171	IRFAN ALI	4269	3/1/2010
172	BAKHT AKBAR	4268	3/1/2010
173	SOHIL	4294	3/2/2010
174	NOMAN KHAN	4295	3/2/2010
175	LATIF ULLAH	4270	3/2/2010
176	MATI UR RAHMAN	4284	3/2/2010
177	FARID KHAN	3618	3/22/2010
178	AMIR MABOOD	4099	4/1/2010
179	TAHIR KAMAL PASHA	4116	4/1/2010
180	IMRAN KHAN	4107	4/1/2010
181	MUDASIR	4109	4/1/2010
182	AMJAD KHAN	4114	4/1/2010
183	KAMRAN KHAN	4117	4/1/2010
184	BAKHT MIR SAID	4371	4/19/2010
185	SAID ZIA ULLAH	4283	6/2/2010
186	IMRAN KHAN	4266	6/2/2010
187	ALIF KHAN KHATAK	4276	6/2/2010
188	MOHAMMAD YASIR KHAN	4280	6/2/2010
189	HABIB UR RAHMAN	4281	6/2/2010
190	FALAK NAZ	4285	6/2/2010
191	DOSTMC HAMMAD	4259	6/2/2010
192	AMJAD ALI	3749	6/14/2010
193	WAJID ALI	3735	6/15/2010
194	SAMI ULLAH	4123	7/1/2010
195	SAJJAD ALI	4124	7/1/2010
196	BASHIR AKBAR KHAN	3342	8/25/2010
197	MOHAMMAD IQRAR	4110	9/1/2010
198	FAZAL NAWAB	4203	9/2/2010
199	ALAM ZEB	4202	9/2/2010
200	SHAHAB HUSSIN	4209	9/2/2010
201	WAHID GUL	3699	9/14/2010
202	SAHAH FAISAL	3757	9/15/2010
203	MOHAMMAD IBRAHIM	3622	9/16/2010
204	IRSHAD AHMAD	3677	9/16/2010
205	RASOOL SHAH	3571	9/23/2010
206	MOHAMMAD IKRAM KHAN	3478	9/27/2010
207	SHER ZAMAN	3563	9/27/2010
208	MOHAMMAD TAHIR	3578	9/27/2010
209	AYAZ ALI	3864	9/29/2010

1/10/10

X210.	IMPAN KHAN	4305 ✓	10/2/2010
X211.	ASAD KHAN	4331 ✓	10/2/2010
X212.	MASIR ULLAH KHAN	3538 ✓	10/6/2010
X213.	ZAHID HUSSAIN	3584 ✓	10/6/2010
X214.	FAISAL HUSSAIN	3612 ✓	10/6/2010
X215.	MQSOOD AHMAD	3645 ✓	10/6/2010
X216.	SHAHAB KHAN	3730 ✓	10/6/2010
X217.	UMAR DARAZ	3733 ✓	10/6/2010
X218.	ABDUL BASIT	3540 ✓	10/6/2010
X219.	ASAD IQBAL	3543 ✓	10/6/2010
X220.	KHAN SARDAR	3919 ✓	10/15/2010
X221.	FARIQ USAMAN	4304 ✓	11/2/2010
X222.	MURAD ALI	3440 ✓	11/5/2010
X223.	MOHAMMAD ZAMAN	4159 ✓	12/13/2010
X224.	SHAKIL	3613 ✓	12/19/2010
X225.	WAQAR AHMAD	4430 ✓	12/25/2010
X226.	ABASS KHAN	3755 ✓	12/28/2010
X227.	INAYAT ULLAH	3471 ✓	12/28/2010
X228.	GUL BACHA	4361 ✓	12/28/2010
X229.	IKRAM ULLAH	4366 ✓	12/28/2010
X230.	SAJJID IBRAHIM	4428 ✓	12/28/2010
X231.	UMAR FAROOQ	4429 ✓	12/28/2010
X232.	SAMI ULLAH	4431 ✓	12/28/2010
X233.	TAHIR KHAN	4432 ✓	12/28/2010
X234.	MOHAMMAD RAHMAN	4433 ✓	12/28/2010
X235.	MOHAMMAD ARIF	3457 ✓	12/28/2010
X236.	M. HABIB ULLAH	3895 ✓	12/28/2010
X237.	MOHAMMAD ZAKIR	3912 ✓	12/28/2010
X238.	FAZAL MALIK	3917 ✓	12/28/2010
X239.	SULIMAN KHAN	3957 ✓	12/28/2010
X240.	AYAZ KHAN	3985 ✓	12/28/2010
X241.	MANZOOR KAMAL	4131 ✓	12/28/2010
X242.	ARSHAD	4161 ✓	12/28/2010
X243.	ADANAN KHAN	4180 ✓	12/28/2010
X244.	FAQIR RAHMAN	4212 ✓	12/28/2010
X245.	IJAZ KHAN	4231 ✓	12/28/2010
X246.	GHOWAS KHAN	4337 ✓	12/28/2010
X247.	KHURSHAJD	4462 ✓	12/28/2010
X248.	HAMAYOON KHAN	4463 ✓	12/28/2010
X249.	ASID KHAN	4468 ✓	12/28/2010
X250.	SHER RAHMAN	4469 ✓	12/28/2010
X251.	WASIM KHAN	3908 ✓	12/28/2010
X252.	MUSHTAQ AHMAD	4472 ✓	12/28/2010
X253.	JAFFAR HUSSAIN	3384 ✓	12/29/2010
X254.	MAHBOOB ALI	3352 ✓	12/29/2010
X255.	AKBAR ALI	3358 ✓	12/29/2010
X256.	UMAR ALI	3406 ✓	12/29/2010
X257.	SANA ULLAH	3436 ✓	12/29/2010
X258.	BAKHT RAHMAN	3549 ✓	12/29/2010
X259.	ALI MOHAMMAD	3562 ✓	12/29/2010
X260.	ROSHAN ALI	3615 ✓	12/29/2010
X261.	SHER ZAMAN	3655 ✓	12/29/2010
X262.	AMJAD ALI MIAN	4162 ✓	12/29/2010
X263.	SAID AKBAR	4448 ✓	12/29/2010



53

264	✓	ALI ZAMIN	3683	✓	12/29/2010
265	✓	MOHAMMAD ALI	3895	✓	12/29/2010
266	✓	SHAHID AHMAD	3927	✓	12/29/2010
267	✓	MOHAMMAD FAYAZ	3930	✓	12/29/2010
268	✓	IRFAN ULLAH	3931	✓	12/29/2010
269	✓	KAMRAN KHAN	3934	✓	12/29/2010
270	✓	ROHOL AMIN	3937	✓	12/29/2010
271	✓	AKBAR ALI	3938	✓	12/29/2010
272	✓	MUSTAQ AHMAD	3937	✓	12/29/2010
273	✓	DOST MOHAMMAD	3943	✓	12/29/2010
274	✓	IFTIKHAR KHAN	3944	✓	12/29/2010
275	✓	NAVEED ALAM	3945	✓	12/29/2010
276	✓	IFTIKHAR AHMAD	3946	✓	12/29/2010
277	✓	NAVEED KHAN	3947	✓	12/29/2010
278	✓	MUZAMIL SHAH	3949	✓	12/29/2010
279	✓	ZAFAR SHAH	3951	✓	12/29/2010
280	✓	MOHAMMAD SHAFIQ	3952	✓	12/29/2010
281	✓	HABIB GUL	3954	✓	12/29/2010
282	✓	IRSHAD ALI	4456	✓	12/29/2010
283	✓	FAYAZ KHAN	4458	✓	12/29/2010
284	✓	IMRAN SHAH	4460	✓	12/29/2010
285	✓	NIGAR ALI	4461	✓	12/29/2010
285	✓	BACHA MUSSAIN	4465	✓	12/29/2010
✓ 287	✓	INQAM ULLAH	3359	✓	12/29/2010
✓ 288	✓	IMRAN	3948	✓	12/29/2010
✓ 289	✓	MUSLIM KHAN	4457	✓	12/29/2010
✓ 290	✓	ASIF KHAN	4474	✓	12/29/2010

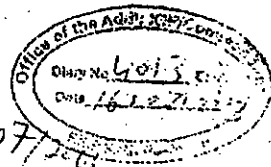
(AWAL KHAN)  
 DIG/Headquarters  
 For Provincial Police Officer  
 Khyber Pakhtunkhwa  
 Peshawar

No. 1684-44 /E-II, dated Peshawar the 15/17 /2013

Copy of above is forwarded for information and necessary action

to the:

1. Addl. IGP/HQ's Khyber Pakhtunkhwa Peshawar.
2. Addl. IGP/Commandant FRP Khyber Pakhtunkhwa Peshawar.
3. Deputy Inspector General of Police, Malakand Region.
4. District Police Officer, Swat.



4743 /OIE dated Peshawar 24/07/2013

Copy of above is sent to SP FRP Malakand  
 Range for information & N/A

*Received*  
 08/22/07/2013  
 For Addl. IGP/Commandant

54

ENLISTMENT ORDER

Mr. Abdullah Khan S/O Abdullah Khan  
Caste Muslim Village Malakand  
Police Station Malakand District Malakand

Is hereby enlisted as Constable in FRP, Malakand Range Police and allotted.

Constabulary No. 4295 with effect from 03-02-2010

Date of Birth 11-11-1970

Domicile Malakand

Height 5' 9"

Chest 34" - 36"

Education 10th

Superintendent of Police FRP,  
Malakand Range Swat.

9/12/10

O.B No. 70

Dated 12/02 /2009.2.0 (1)

*5664*  
*sd/*  
*checked*

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BETTER COPY

ENLISTMENT ORDER

Mr MOOMAN KHAN S/O AMRALL KHAN

Caste Afghan Village Malakand

Police station Malakand District Malakand

Is hereby enlisted as constable in FRP, Malakand Range Police and allotted constabulary NO. 4295 with effect from 03-02-2010

Date of Birth 01-01-1990

Domicile Malakand

Height 5' 9"

Chest 34 00 36

Education 10th

*Signature*

Superintendent of Police FRP,

Malakand Range Swat.

9/1/010

O.B No 70

Dated 12.02 /2009/10

ORDER

This order will dispose off the departmental enquiry against Constable Noman No.1057 who while posted to JIS Police Lines has absented himself from his lawful duty without prior permission or leave w.e.f. 28-01-2014 to 24-02-2014 again from 28-02-2014 to 01-05-2014 (Total 02 months, 27 days, 23 hrs and 50 minutes) and while posted to Police Station Matta has absented himself from 23-05-2014 up till now.

He was issued Charge Sheets alongwith statements of Allegations and SDPO/City Circle, SDPO/Madyan Circle and SDPO/Khwaza Khela Circle were deputed as Enquiry Officers. The Enquiry Officers conducted proper departmental Enquiries against the delinquent officer and recorded the statements of all concerned officers. They have provided ample opportunity to the delinquent officer to defense the absence rendered by him. After conducting proper departmental enquiries, the Enquiry Officers submitted their findings whereir they recommended the delinquent Constable for treating absence period as leave without pay, warning to be careful in future and for major punishment respectively. He was called in Orderly Room. But he could not appear to present plausible defense for his unlawful absence.

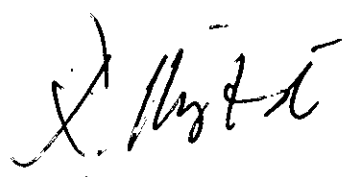
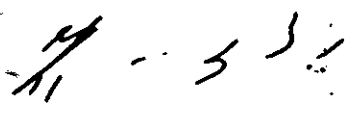
Having perused his service record, it was patiently evident that the delinquent officer Constable Noman No.1057 is addicted to a chronic absentees and is not interested to continue his service. Foregoing in view the undersigned is of considered opinion that there are no chances that Constable Noman No.1057 become an efficient Police Officer. His further retention in service is bound to affect the discipline of the entire force. Therefore, in exercise of the powers vested in the undersigned under Rules 2 (iii) of Police Disciplinary Rules-1975, I, Sher Akbar, S.St, P.S.P, District Police Officer, Swat as a competent authority, am constrained to award him the punishment of Removal from service from the date of absence.

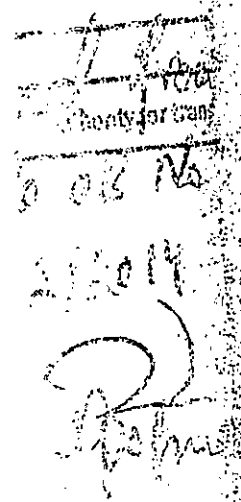
Order announced.

  
District Police Officer, Swat

O.B. No. 139  
Dated 15/5 /2014.

\*\*\*\*\*



The Worthy Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

*Anwar Khan*

~~57~~  
57

Subject: **DEPARTMENTAL APPEAL/APPLICATION FOR  
REINSTATEMENT AS CONSTABLE IN POLICE,  
DISTRICT SWAT.**

Respected Sir,

The applicant may be allowed to submit the following submissions  
for your kind and sympathetic consideration: -

1. That the applicant was enrolled as Constable in District Police Swat in the year 2010.
2. That the applicant served in the department to the satisfaction of his officers and no complaint was ever made against the applicant by his respectable seniors.
3. That the applicant was remained ill and was unable to perform duty. (Medical leave is attached for kind perusal)
4. That the absence was not willful and deliberate however it was beyond control of the applicant.
5. That vide order No.139, dated 15.08.2014 the name of the applicant was stuck off by the District Police Officer, Swat.
6. That the applicant is willing to serve the police department.

It is therefore requested that the applicant may kindly be reinstated and give a chance to service the department.

The applicant always will pray for your long life and prosperity.

Yours Obediently,

*(Signature)*

**(NOMAN KHAN)**  
Ex-Constable No.1057  
PS. Matta, Swat  
0344-8196023  
0313-9925399

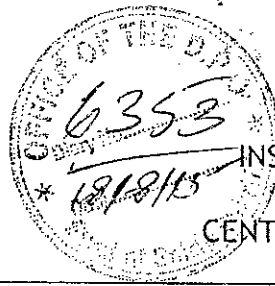
*Registrar*

*PLS process*

*Imam AP30  
11/11*

*(Signature)*

*✓*



Signature *[Handwritten Signature]* 58

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
CENTRAL POLICE OFFICE, PESHAWAR

### ORDER

This order is hereby passed to dispose off departmental appeal under Rule 11-a of Khyber Pakhtunkhwa Police Rule-1975 submitted by Ex-Constable Noman Khan No. 1057 of District Police Swat against the Punishment Order i.e removal from service passed against the appellant by DPO/Swat vide Order Book No. 139 dated 15.08.2014.

In the light of recommendations of Appeal Board meeting held on 06.08.2015, the board examined the enquiry in detail & other relevant documents. It revealed that the appellant was served with Charge Sheet/Statement of Allegations and punishment order was announced on the basis of reply to the Charge Sheet and Statement of Allegations.

The appellant was heard in detail. Record perused. The said Ex-Official has absented himself from lawful duty for 03 months and 08 days. He also got 10 bad entries having no good entry. The board rejected his appeal.

Order announced in the presence of appellant.

Sd/-  
NASIR KHAN DURRANI  
Inspector General of Police,  
Khyber Pakhtunkhwa Peshawar.

No. 9802-6 /E-IV dated Peshawar the 12/08/2015

Copy of above is forwarded to the:-

1. Regional Police Officer, Malakand Region.
2. District Police Officer, Swat . The service Roll, Fauji Missal and Enquiry File of the above named official are returned herewith.
3. PSO to IGP/Khyber Pakhtunkhwa Peshawar.
4. PA to Addl: IGP/HQrs Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs Khyber Pakhtunkhwa, Peshawar.

*[Handwritten Signature]*  
(SYED FIDA HASSAN SHAH)  
AIG/Establishment

For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

12/8/15

*EC/PA/Asi*

*For reaction*

*DPO Swat 12/08/15*

990  
7/10/14

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**OFFICE OF THE REGIONAL POLICE OFFICER, MALAKAND REGION, AT SAIDU SHARIF SWAT**

**ORDER:**

This order will dispose off appeal of Ex-Constable Noman Khan No. 1057 of Swat District for reinstatement in service.

Brief facts are that Ex-Constable Noman Khan No. 1057 while posted to Javid Iqbal Shaheed Police Lines Swat absented himself from lawful duty with effect from 23/01/2014 to 24/02/2014, and 28/02/2014 to 01/05/2014 without prior permission of his superior. DSP City, DSP Madyan and DSP Khwaza Khela have conducted proper departmental enquiry against the appellant. During enquiry the committee has recorded statements of all concerned officers. They have also provided ample opportunity to the appellant for self defence. After conclusion of enquiry the Enquiry Committee submitted their findings and recommended the absence period as leave without pay, warned to be careful in future including major punishment respectively. The applicant was also called in Orderly Room by District Police Officer, Swat but he could not present plausible defence for his unlawful absence. After completion of coddle formalities of the enquiry he was found guilty of the charges, hence the applicant was removed from service from the date of absence vide OB No. 139 dated 15/05/2014.

The appellant was called in Orderly Room on 31/10/2014 and heard him in person, but he did not produce any substantive materials in his defense. Therefore I uphold the order of District Police Officer, Swat, whereby the appellant has been awarded major punishment of removal from service. His appeal is filed.

Order announced.

(ABDUL AH KHAN) PSP  
Regional Police Officer,  
Malakand, at Saidu Sharif Swat

\*Naqi\*

No. 909 /E,

Dated 6-11 /2014.

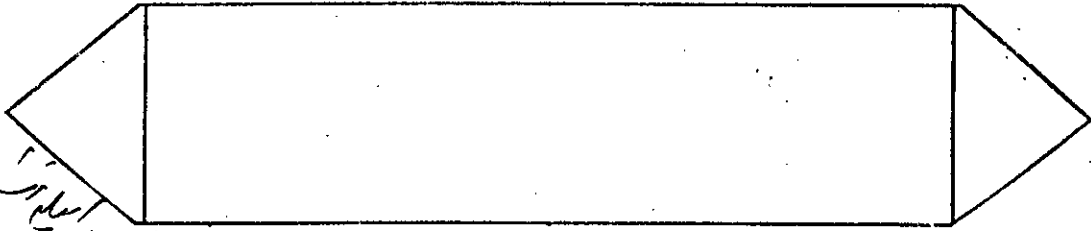
Copy to District Police Officer, Swat for information and necessary action with reference to his office Memo: No. 14617/E, dated 18/09/2014.

Signature/Initials

Signature/Initials

DPO Swat  
10/11/14

KPK  
بعدالت سرسبز سوسائٹی



2، پنجاب اسلام آباد  
بنام راجپال پورس انٹرنیٹ

سومان خان  
اسٹیٹ

- موزعہ
- مقدمہ
- دعویٰ
- جرم

سرسبز

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام سرسبز کیلئے محمد راجپال پور  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت 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۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔  
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم // ماہ 09 کی 20

واہ العیہ

کے لئے منظور ہے۔

بمقام  
محمد راجپال پور  
محمد راجپال پور



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

Service Appeal No. 1329/2015.

Numan Khan S/O Amrali Khan R/O Mohallah Azikhel, Village Aladand, Tehsil Batkhela  
District Malakand

..... Appellant

VS

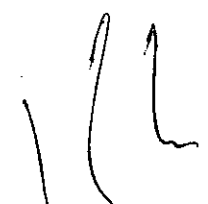
1. Regional Police Officer, Malakand Region at Saidu Sharif, Swat
2. District Police Officer, Swat
3. Additional Inspector General of Police, Khyber Pakhtunkhwa, Peshawar

..... Respondents

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District Police Officer, Swat

~~District Police Officer,  
Swat~~

(1)

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

Service Appeal No. 1329/2015.

Numan Khan S/O Amrali Khan R/O Mohallah Azikhel, Village Aladand, Tehsil Batkhela  
District Malakand

..... Appellant

VS

1. Regional Police Officer, Malakand Region at Saidu Sharif, Swat
2. District Police Officer, Swat
3. Additional Inspector General of Police, Khyber Pakhtunkhwa, Peshawar

..... Respondents

**PARAWISE COMMENTS ON BEHALF OF RESPONDENTS:**

**Respectfully Shewith:**

**Preliminary Objection:**

1. That the service appeal is time barred.
2. That the Service Appeal is not maintainable in the present form and liable dismissal.
3. That the Appellant has not come to this August Tribunal with clean hands.
4. That the appellant has concealed material fact from this August Tribunal.
5. That the appellant is estopped due to his own conduct.

**ON FACTS**

1. Para No. 01 pertain to the service record of the appellant, therefore needs no comments.
2. Para No. 02 is incorrect. The appellant is a habitual absentee and willfully absented himself from lawful duties without any authorized leave or prior permission of the competent authorities. On re-joining his duties after absence; the appellant either pretends his own illness, his mother's illness or grand mother's illness. The following statistics better explains appellant's disinterest in duty.
  - a. 3 days absent from 03-06-2010 to 12-06-2010 was counted as leave without pay O.B No. 212 dated 11-06-2010.
  - b. 2 days absence period was counted as leave without pay O.B No. 413 dated 22-11-2010.
  - c. 5 days absence counted as leave without pay, O.B No. 294 dated 29-07-2011.
  - d. 6 days absence counted as leave without pay, O.B No. 400 dated 21-10-2011.

- e. 2 days absence counted leave without pay, O.B No. 399 dated 20-10-2011.
- f. 3 days absence counted leave without pay, O.B No. 443 dated 01-12-2011.
- g. 13 days absence counted leave without pay, O.B No. 443 dated 01-12-2011.
- h. 18 days absence counted leave without pay, O.B No. 242 dated 16-07-2012.
- i. 24 days absence counted leave without pay, O.B No. 39 dated 03-01-2013.
- j. 5 days absence counted leave without pay, O.B No. 216 dated 31-12-2013.
- 3. Correct to the extent that the appellant was removed from service vide O.B No. 139 dated 15-08-2014. The appellant absented himself from lawful duty without prior permission or leave w.e.f 28-01-2014 to 24-02-2014 and w.e.f 28-02-2014 to 01-05-2014 total 02 months and 27 days. Proper departmental enquiry was conducted and the appellant was held responsible for misconduct. Vide complete papers (10 Pages) is Annexure -"A", complete. Enquiry papers (10 pages) as Annexure-"B". Enquiry papers (07 pages) as Annexure-"C" & final order as Annexure-"D".
- 4. Para No. 4 is correct.
- 5. Needs no comments.

**ON GROUNDS:**

- i. Incorrect. The removal order from service of the appellant is legal, justified and all cadal formalities have been adopted before removing him from service.
- ii. Incorrect. Thousands of other police personnel have also been performing their duties in Malakand Region who have no such problems and complaint like the appellant. If the appellant is actually suffering from severe stress, depression and mental incapacity then his retention in service is too harmful for public as well as for a disciplined force.
- iii. Incorrect. Proper departmental enquiry was conducted against the appellant. This contention of the appellant is false and without reasons.
- iv. Incorrect. The appellant was called in orderly room but he couldn't present any cogent reason in his defense.
- v. Incorrect. Whenever the appellant gets absent from duty he pretends his own and even other family member's illness.

- vi. The respondents may also be allowed to present more grounds and points at the time of arguments.

**PRAYER:**

In view of the above comments on facts and ground it is very humbly requested that the appeal of the appellant may be dismissed with costs.

**Regional Police Officer,  
Malakand Region at Saidu Sharif, Swat  
(Respondent No. 01)**

**Regional Police Officer,  
Malakand, at Saidu Sharif Swat.**

**District Police Officer, Swat  
(Respondent No. 02)**

**District Police Officer,  
Swat**

**Additional Inspector General of Police,  
Head Quarters, CPO Peshawar  
(Respondent No. 03)**

(3)

**BEFORE THE KHYBER PAKHUTNKHWA SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No. 1329/2015

Numan Khan s/o Amrali Khan r/o Mohallah Azikhel, Village Aladand, Tehsil Batkhela District  
Malakand ..... Appellant


**VERSUS**

- 1) Regional Police Officer, Malakand Region at Saidu Sharif, Swat
- 2) District Police Officer, Swat
- 3) Additional Inspector General of Police, Headquarters, Khyber Pakhutnkhwa Peshawar


..... Respondents

**AUTHORITY LETTER**

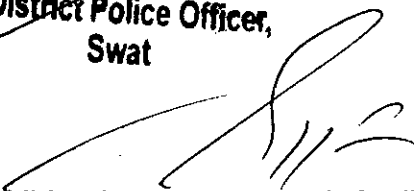
We the above respondents do hereby authorize Mr. Imranullah Inspector Legal Swat to represent us in the August Service Tribunal and do whatever is needed on our behalf.

  
Regional Police Officer,  
Malakand Region, Saidu Sharif, Swat  
(Respondent No.01)

**Regional Police Officer,**  
Malakand, at Saidu Sharif Swat.

  
District Police Officer, Swat  
(Respondent No.02)

**District Police Officer,**  
Swat

  
Additional Inspector General of Police,  
Headquarters, Khyber Pakhutnkhwa  
Peshawar  
(Respondent No.03).

04

**BEFORE THE KHYBER PAKHUTNKHWA SERVICE TRIBUNAL PESHAWAR.**

Service Appeal No. 1329/2015

Numan Khan s/o Amrali Khan r/o Mohallah Azikhel, Village Aladand, Tehsil Batkhela District  
Malakand ..... Appellant

**VERSUS**

- 1) Regional Police Officer, Malakand Region at Saidu Sharif, Swat
- 2) District Police Officer, Swat
- 3) Additional Inspector General of Police, Headquarters, Khyber Pakhutnkhwa Peshawar

..... Respondents

**AFFIDAVIT**

We the above respondents do hereby solemnly affirm on oath and declare that the contents of the appeal are correct/true to the best of our knowledge/behalf and nothing has been kept secret from the honorable Service Tribunal Khyber Pakhutnkhwa Peshawar

Regional Police Officer,  
Malakand Region, Saidu Sharif, Swat  
(Respondent No.01)

**Regional Police Officer,**  
Malakand, at Saidu Sharif Swat.

District Police Officer, Swat  
(Respondent No.02)

**District Police Officer,**  
Swat

Additional Inspector General of Police,  
Headquarters, Khyber Pakhutnkhwa  
Peshawar  
(Respondent No.03)

6

**DISCIPLINARY ACTION**

I Mr. Sher Akbar S.St. P.S.P. District Police Officer, Swat as competent authority, is of the opinion that he Constable Noman No.1057 while posted to JIS Police Lines has rendered himself liable to be proceeded against departmentally as he has committed the following acts/omissions as defined in Rule 2 (iii) of Police Rules 1975, as per Provincial Assembly of Khyber Pakhtunkhwa Notification No. PA/Khyber Pakhtunkhwa/ Bills/ 2011/ 44905 dated 16/09/2011 and C.P.O, K.P:K Peshawar Memo: No. 3037-62/Legal, dated 19/11/2011.

**STATEMENT OF ALLEGATIONS**

It has been reported that he while posted to JIS Police Lines committed the following act / acts, which is / are gross misconduct on his part as defined in Rules 2 (iii) of Police Rules 1975.

That he Constable Noman No.1057 while posted to JIS Police Lines has absented himself from duty without prior permission or leave vide D.D. No.59 w.e.f. 28-01-2014 up till now as per report of Line Officer, JIS Police Lines dated 15-02-2014.

2. For the purpose of scrutinizing the conduct of the said officer with reference to the above allegations, SDPO/Madyan Circle, Swat is appointed as Enquiry Officer.

3. The enquiry officer shall conduct proceedings in accordance with provisions of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused officer, record its findings and make within twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused officer.

4. The accused officer shall join the proceedings on the date, time and place fixed by the enquiry officer.

  
District Police Officer, Swat

No. 46 /EB, Dated Gulkada the, 6-3 2014

Copy of above is forwarded to the:-

1. SDPO/Madyan Circle, Swat for initiating proceeding against the accused Officer/ Official namely Constable Noman No.1057 under Police Rules, 1975.
2. Constable Noman No.1057 JIS Police Lines:-  
With the direction to appear before the Enquiry Officer on the date, time and place fixed by the Enquiry Officer for the purpose of enquiry proceeding.

\*\*\*\*\*

**ATTESTED**



Deputy Superintendent of Police Legal,  
Swat.



7

CHARGE SHEET

I Mr. Sher Akbar S.St. P.S.P. District Police Officer, Swat as competent authority, hereby charge you, Constable Noman No.1057 while posted to JIS Police Lines as follows:-

It has been reported that you committed the following act / acts, which is / are gross misconduct on your part as defined in Rules 2 (iii) of Police Disciplinary Rules 1975.

You Constable Noman No.1057 while posted to JIS Police Lines have absented yourself from duty without prior permission or leave vide D.D. No.59 w.e.f. 28-01-2014 up till now as per report of Line Officer, JIS Police Lines dated 15-02-2014.

2. By reasons of the above, you appear to be guilty of misconduct and rendered yourself liable to all or any of penalties specified in Rule-4 of the Disciplinary Rules 1975.

3. You are, therefore, required to submit your written reply within seven (7) days of the receipt of this Charge Sheet to the Enquiry officer.

4. Your written reply, if any, should reach the Enquiry Officer within 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 as to whether you desire to be heard in person or not.

6. A statement of allegations is enclosed.

**ATTESTED**

3  
District Police Officer, Swat

No. 46 /E,

Dated: 6-3 /2014.

*[Handwritten Signature]*

Deputy Superintendent of Police Legal,  
Swat.

بیان اذنی کیلئے نمان ۱۵۵۷  
مُتَعَمَّر دال لولین لائین

بعد یقیناً بیان کرتا ہے کہ میں جاویدا مال شخص  
لولین لائین میں ڈیوٹی کرتا رہا کہ فورم ۲۵/۹  
کو ہمارے گھر سے میری ماں کی بیماری کے بارے  
میں اطلاع دی گئی۔ ماں کی بیماری کے متعلق سنا کر  
گھر چلا گیا اور اپنی ماں کو علاج معالجہ کیلئے  
لٹاؤر لے گیا جہاں ڈاکٹر صاحب نے اسے  
تجویز دے دیا۔ ہسپتال سے فارغ ہو کر لولین لائین  
پر حاضر ہوا۔ قصداً میرے حاضر ہونے پر جو انما تکم  
مجبوری کو ہم سے میرے حاضر ہونے کی وجہ سے  
مناظر ہو گیا۔ لولین لائین میں بیان ہے جو کہ درست ہے

الغیر

کیلئے نمان ۱۵۵۷

نوائسٹل ۰۳۴۴ ۸۱۹۶۰۲۳

صیح  
\*\*\*

س۔ د۔ آپ کی کوئی اطلاع ہو گئی ہے؟  
ج۔ ہاں کی بیماری کی وجہ سے میرے حاضر ہونے پر  
س۔ ہا۔ آپ گھر خود اپنی مرضی سے گئے تھے؟

ج۔ ہا۔ جی ہاں۔  
س۔ کیا آپ کے گھر میں اور کوئی ناراضہ (عزیز) ہیں؟  
ج۔ ہا۔ جی نہیں۔ میرے والد صاحب تین سال پہلے وفات پا گئے تھے۔

ATTESTED

*[Signature]*

نمان

حضور میں لایا گیا ہے  
یہ اس کے لئے ہے

فہرست

نمبر 59 مورخہ 28/01/2014  
= α = α = α =

نمبر 59 مورخہ 28/01/2014 مورخہ 19:45 بجے مورخہ 28/01/2014  
کاروبار میں گئے سے کنستبل عدالت کی 3247 جائزہ دفتر اگر بولے اور  
کرنے کے لئے مورخہ عدالت کنستبل کی راجہ علی 1893، نفاذ 1056 جو کہ  
حال وقوع کی کاپی حاضر نہیں آئے اور اپنا حوالہ دینے میں بند کیا گیا  
یہ صورت لے کر عدالت کنستبل کا بندوبست کریں جس سے گرفتاری  
درج اور باقی ہو کر کنستبلوں کے ملازمین کے مورخہ مورخہ مورخہ مورخہ  
کاپی اور عدالت کنستبل کا بندوبست کیا جا رہا ہے۔

بھائی صاحب  
نقل عدالت مورخہ  
R.I - P.L - Swat  
03-02-2014

ATTESTED

*Allee*

Deputy Superintendent of Police Legal Swat.

S.M. Forwarded.

*Ca*  
Lo - P.L - Swat  
03-02-2014

S.M. Forwarded

R.I - P.L - Swat  
03-02-2014

(10)

سائل کی کاپی

درخواست نامہ بدترک تنخواہ

جناب عالی

معرض خدمت میں کہ ریٹیل انعام 1057 بحوالہ عد 59  
روزنامہ 28/01 سے بدترک غیر حاضر ہوا آ رہا ہے مذکورہ کی تالی  
کا کوئی انعام نظر نہیں آ رہا ہے۔

لہذا بدترک درخواست استعفا صغیر مذکورہ کی ماہ جولائی  
کا تنخواہ بدترک کا حکم صادر فرمائے مشکور فرمائیں۔

AMHC - PL - Swat  
02-02-2014

Sir,  
Forwarded

Sir,  
His pay may be ~~ca~~

stopped please

PL - PL - Swat  
03-02-2014

Sir,  
forwarded

PL - Swat  
02-02-2014

ATTESTED

OSP/PL Swat  
11-2-2014

pay stopped

Deputy Superintendent of Police Legal  
Swat.  
OB No. 28  
17-2-14

Sp. PL Swat  
10-2-14

103

(11)

کال کونسل

دوایات بلک مارڈیو

جناب عالی

معرض حضرت پوریہ کنیشن لھان نمبر 1057 والہ فرم 59 روزنامہ  
28/02/14 سے بدستور ہوا ہے اور اب سے ضرورہ کھینچا سوچ 02/02/14 کو دوایات  
بلک مارڈیو ایسٹ ایسٹ ایسٹ ایسٹ ایسٹ ایسٹ ایسٹ ایسٹ ایسٹ ایسٹ ایسٹ ایسٹ  
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Amic. Pl. Swat  
15-02-14

Sir,  
forwarded for initiating proper  
departmental enquiry please.

Sir,  
Forwarded  
to Pl. Swat  
15-2-14

DSP/HQ Swat  
20-2-2014

ISSUE charge Sheet. ATTESTED Forwarded

DPO/ Swat  
21-2-14


Deputy Superintendent of Police Legal.  
Swat.  
R.1 - pl - swat  
16-02-2014


مہا پیکر

جو الہ چارج شیٹ نمبر 46E مورچہ 063  
2014

مخبر نے کہا کہ وہ 2010 میں جب کہ وہ اپنے گھر پر  
 آیا تو وہ اپنی خوش اسلوبی ایمانداری اور احسن طریق  
 سے اپنا ڈیوٹی سر انجام دیتا رہا مورچہ 063 کو گھر سے  
 کو بائیل پر والدہ صاحبہ کی بیماری کے متعلق اطلاع وصول ہوئی  
 تھا گھر خود جائز رہا والدہ صاحبہ کو علاج معالجہ کے خاطر  
 لے گیا۔ جہاں پر علاج معالجہ ہو کر آپریشن کے وقت  
 دے کر والی اپنی ڈیوٹی پر حاضر ہوا۔ غیر حاضر ہو کر  
 مہوری ہوئی ہے آئندہ سے محتاط رہوگا۔

استعداد چیمبر چارج شیٹ کو پیدائشی کارروائی  
 کی فائل کے ساتھ استعدادی جاتی ہے۔

  
 کنیل ننگان 1057  
 ڈائریکٹر آف پولیس  
 08/05/14

ATTESTED  
  
 Deputy Superintendent of Police Legal,  
 Swat.

نقلہ 63 روزنامہ 24/05/14  
= α = α =

عد 63 عالمی / بندہ شا کوٹر گاڑی MASI وقت 19:30 بج عورتہ 24/05/14 اس وقت  
کشیل بھان 1057 غیر حاضر شدہ بحوالہ عد 63 روزنامہ 28/05/14 سے عالمی  
بیانی ہے کہ میں بوسہ گھریوں بھانہ غیر حاضر ہوا نقاربا حاضر آیا ہوں  
عالمی کراچی دستور اردو میں مذکورہ کی رپورٹ عالمی درج روزنامہ  
ٹرک جسے اسلم جناب 05/11/14 سے بندہ کوٹر گاڑی کو جو ہوا وقت  
مندی کوٹر کی بھان کھی -  
تفصیل غیر عالمی

نقلہ 59 روزنامہ 28/05/14  
= x = x =  
(45) - (23) - (26)

عد 59 آدر رپورٹ غیر عالمی میا وقت 19:45 بج عورتہ 28/05/14 اس وقت  
بھان میں کھی سے کشیل بھان ولی 3247 عالمی غیر کھی رپورٹ  
کرتا ہے کہ میرے متبادل کنڈیلان رخت علی 1893 ، بھان 1057 جو کہ نا حال  
ڈیوٹی کھی عالمی آئے اور مینا عوٹیل فون بھی بند کیا چوری  
میرے سے متبادل کنڈیلان لگ بندوسین کریں جسے کھی رپورٹ  
درج روزنامہ 28/05/14 سے بندہ کوٹر گاڑی کو جو ہوا وقت  
مندی کوٹر کی بھان کھی اور متبادل کنڈیلان لگ بندوسین کیا -

جناب عالی  
نقل بھان اولی ہے -

Sir,  
forwarded.  
Lo. Pt. No. 12.5.014.

ATTESTED

*[Signature]*

Deputy Superintendent of Police Legal  
Swat.

*[Signature]*  
MAGI-1-12.5.014.

بیان اوان MASI/Lo مہر زبیب خان لوکیس لائن کو  
نے بیان کیا کہ میں لوکیس لائن میں

کنسٹبل شہر تھان میں کنسٹبل گمان مر 1057

کوالم عدوی مورناچی 98 <sup>01</sup>/<sub>514</sub> جو عدید عام طور پر

مذکورہ کنسٹبل نے کوالم عدوی مورناچی 2 <sup>01</sup>/<sub>514</sub> کو

حافی کی رپورٹ کی مذکورہ کنسٹبل کے ففلا

حافی ویدر حافی / مدرس تگواہ، حمام کارولائی ہر عقد

امسراں بالا کو لکھوائی گئی ہے

تس (کی) میں بیان جو کے دستہ کے

ATTESTED

Deputy Superintendent of Police Loyal Swat

MASI/Lo مہر زبیب خان لوکیس لائن  
سو



فائبرنگ رپورٹ

جناب عالی!

حوالہ مشورم کاغذات انکوائری بسلسلہ غیر حاضری ازان کیٹیل

نمبران ۱۵۵۷ مشورم ڈال پولیس لائن حال ٹھانہ منہ معروض خدمت ہونے کیٹیل

نمبران ۱۵۵۷ جوگ ڈال پولیس لائن میں تعینات تھا جوگ  $\frac{28}{014}$  کو حوالہ عدلیہ

ڈال پولیس لائن سے غیر حاضر ہو کر جگا نقلیہ غیر حاضری دفتر صاحبان DPO

سوات سرسل ہو کر صاحبان DPO صاحبان نے مذکورہ کے خلاف انکوائری

کیے۔ کاغذات عدلیہ کو مارجن کے لئے

دوران انکوائری فیروز لائن آف ڈال پولیس لائن نے مذکورہ کیٹیل

کے تعلیم حاضری عد 63 روز نامہ  $\frac{02}{014}$  ڈال پولیس لائن سے دفتر سرسل

بھیجا کر شامل انکوائری ہوئی۔ جوگ  $\frac{24}{014}$  کیٹیل نمبران ۱۵۵۷ بسلسلہ انکوائری

میں ہو کر خارج شدہ ڈسپلنری آرڈر کاغذات کیساتھ ساتھ ایسا کنسلٹی بیان بھی میں

اور مذکورہ کا بیان بھی لیا جا کر شامل انکوائری کی گئی

مذکورہ کیٹیل نے اپنے بیان میں وضاحت کی ہے کہ اسکی ماں بیمار ہو کر

علاج معالجہ کیے اور اسکا کھل  $\frac{23-26}{014}$  دن تک غیر حاضری کے عرصہ

کو باقاعدہ ایسی حاضری کی رپورٹ ڈال پولیس لائن میں کی گئی

کیٹیل نمبران ۱۵۵۷ نے جوگ  $\frac{28}{014}$  سے  $\frac{24}{014}$  تک غیر حاضری کی گئی

مذکورہ کیٹیل کو صاحبان نے ہمارے بذریعہ درخواست بھی منظور کر کے فالو

علاج معالجہ کیے جانا چاہیے تھا لیکن انہوں نے ایسا نہیں کیا بلکہ غیر حاضری

کے گھر خود گیا ہے

لہذا ایام غیر حاضری بلا تشوہ کر نیکی سفارش کی جاتی ہے

ATTESTED

Mirza  
ڈی ایڈیٹر سرکل عدلیہ  
19-05-014

Deputy Superintendent of Police Legal  
Swat.

OR  
DPO Swat

**DISCIPLINARY ACTION**

I **Mr. Sher Akbar S.St. P.S.P. District Police Officer, Swat** as competent authority, is of the opinion that he **Constable Noman No.1057** while posted to **JIS Police Lines** has rendered himself liable to be proceeded against departmentally as he has committed the following acts/omissions as defined in Rule 2 (iii) of Police Rules 1975, as per Provincial Assembly of Khyber Pakhtunkhwa Notification No. PA/Khyber Pakhtunkhwa/ Bills/ 2011/ 44905 dated 16/09/2011 and C.P.O, K.P.K Peshawar Memo: No. 3037-62/Legal, dated 19/11/2011.

**STATEMENT OF ALLEGATIONS**


It has been reported that he while posted to **JIS Police Lines** committed the following act / acts, which is / are gross misconduct on his part as defined in Rules 2 (iii) of Police Rules 1975.

That he **Constable Noman No.1057** while posted to **Javed Iqbal Shaheed Police Lines** has absented himself from duty without prior permission or leave vide D.D. No.68 with effect from 28-02-2014 up till now as per report of Lines Officer, JIS Police Lines dated 15-03-2014.

2. For the purpose of scrutinizing the conduct of the said officer with reference to the above allegations, **SDPO/City Circle, Swat** is appointed as Enquiry Officer.

3. The enquiry officer shall conduct proceedings in accordance with provisions of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused officer, record its findings and make within twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused officer.

4. The accused officer shall join the proceedings on the date, time and place fixed by the enquiry officer.

  
District Police Officer, Swat


No. 58 /EB, Dated Gulkada the, 18/3 2014.

Copy of above is forwarded to the:-

- 1.- **SDPO/City Circle, Swat** for initiating proceeding against the accused Officer/ Official namely **Constable Noman No.1057** under Police Rules, 1975.
2. **Constable Noman No.1057 JIS Police Lines:-**  
With the direction to appear before the Enquiry Officer on the date, time and place fixed by the Enquiry Officer for the purpose of enquiry proceeding.

\*\*\*\*\*

**ATTESTED**

  
Deputy Superintendent of Police Legal,  
Swat.

**CHARGE SHEET**

I Mr. Sher Akbar S.St. P.S.P. District Police Officer, Swat as competent authority, hereby charge you, Constable Noman No.1057 while posted to JIS Police Lines as follows:-

It has been reported that you committed the following act / acts, which is / are gross misconduct on your part as defined in Rules 2 (iii) of Police Disciplinary Rules 1975.

You Constable Noman No.1057 while posted to Javed Iqbal Shaheed Police Lines have absented yourself from duty without prior permission or leave vide D.D. No.68 with effect from 28-02-2014 up till now as per report of Lines Officer, JIS Police Lines dated 15-03-2014.

2. By reasons of the above, you appear to be guilty of misconduct and rendered yourself liable to all or any of penalties specified in Rule-4 of the Disciplinary Rules 1975.

3. You are, therefore, required to submit your written reply within seven (7) days of the receipt of this Charge Sheet to the Enquiry officer.

4. Your written reply, if any, should reach the Enquiry Officer within 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 as to whether you desire to be heard in person or not.

6. A statement of allegations is enclosed.

District Police Officer, Swat

No. SS /E,

Dated: 28/3 /2014.

ATTESTED

*[Signature]*  
Deputy Superintendent of Police Legal  
Swat.

کتابت و تصدیق

نقلہ 68 مورخہ 28/02/14

28/02/14

68 گنتی عمارت میں اور ان کے ساتھ 20500 رقم جمع شدہ  
28/02/14 اس وقت گنتی عمارت میں گنتی سے موجود رقم  
اور عمارت میں کی گئی ڈیوٹی اور عمارت میں گنتی سے  
از مجموعی رقم اجمالی گنتی میں ضابطہ گنتی سے  
میں کو اس میں عمارت میں 43 ایک فونی نمبر 2057  
موجود گنتی میں موجود باک میں کے خلاف اور ان میں  
عامی درج اور ان کے ایک -

بنا علی  
نقل عمارت میں

Sir, forwarded.

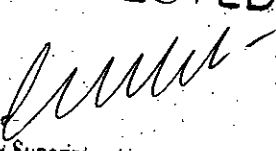
Dr.

to pl. Swat  
6-3-014.

Sir,  
Forwarded

R-1-pl-Swat  
10-03-2014

Handwritten signature  
6-3-014.

ATTESTED  
  
Deputy Superintendent of Police Swat.

1057

درخواست برائے منسب نو

بذریعہ درخواست صدر عن فریقہ یون کے جنرل  
سبحان 7516 کو 68 اور تا 28/2/14 تک ہر روز  
غیر طالعہ ہوا اور اس کے سلسلے کا نام آنا کی کوئی  
امور میں سے

بذریعہ درخواست اسٹریٹ سیکرٹری کو  
تواہ کا وہ نام ہے کہ اس کا نام فاروق ہے

Sir Forwarded

J

LO. PL. Swat  
07.03.14

AMAL. PL. Swat  
07.03.14

Sir,  
His pay may be stopped Pl.

Sir Forwarded

R-1-PL-Swat  
6-03-2014

DSP/HQ Swat  
10-3-14

ATTESTED

pay stopped

Deputy Superintendent of Police Legat.  
Swat.

OB. No. 43  
12-3-14

SP. H. Q. Swat  
11-3-14

15 مارچ 1957

تقریباً 68 فیصد  
28/14 = + =

۱۸ مارچ ۱۹۵۷ء کو پورے غیر جانبدار ماسی وقت ۲۰۰:۰۰ سے ۲۸/۱۴ تک  
ملازمین کی فہرست میں سے صرف دفاعی اہلکاروں کو ملازمین سے معذور یا  
ملازمین کے ساتھ ساتھ معذور یا حکم و نظام کے تحت برقرار رکھا گیا۔  
۱۰۵۷  
۱۵-۰۳-۱۴

مقامی

مقامی

15-03-14

ATTESTED

*[Signature]*

Deputy Superintendent of Police Legat  
Swat.

1057

کسٹیشن

درخواست بسراد حیدرآباد کارروائی

مقام عالی (صرفاً عدالت ہول کم ٹیسٹ لیٹان 1057/2 جو ال ایچ 68

ایڈیشن 28/02/14 سے دستور بخیر حاضر ہے آرٹیکل 227(2) کے تحت

موضوع 06/03/14 کو درخواست بسراد حیدرآباد ترقیاتی کمیٹی کے

مذکورہ عدویہ کا کوئی امکان نظر نہیں آتا ہے۔

لہذا درخواست کو عدالت سے واپس لیا گیا ہے

کارروائی شروع کر کے اس کے مطابق عملدرآمد ہوا

AMHC. PL Swat  
15-03-14

Sir,  
Forwarded  
to PL Swat  
15-03-14

Sir,  
Forwarded for initiating proper  
departmental enquiry PI:

Sir, forwarded  
R.I - PL Swat  
15-03-2014

DSP/HR Swat  
17-3-14

ATTESTED  
Deputy Superintendent of Police Legal  
Swat

ISSUE charge Sheet  
DPO/ Swat

جاوید اقبال مشہد  
پولیس لائن سوات

تعلیمی 39 روزہ گارڈ مہینہ 14/5

مہینہ 39 حافظ / اندیش کوئٹہ گارڈ مہینہ 14/5 وقت 20:05 تا مورن  
اس وقت ریل ٹھکانہ 1057 حافظ مشہد جولائی 68 روزہ 14/5 سے صاف  
آبرو جی غیر حافظی بیماری خود بیان کی - دستخط اظہار نوری بن مہرورہ کی  
رپورٹ حافظی رنج مہینہ سے معرکہ حکم جاب 14/5 صاف ناقص تانی  
مذہب کوئٹہ گارڈ کرکہ منبری موجود الوقت کو ننگرانی کی بدامنی میں  
تفصیل غیر حافظی

تعلیمی 68 روزہ گارڈ مہینہ 14/5 وقت 20:05 تا مورن 14/5  
مہینہ 68 گنئی ملہر زمین / اورش غیر حافظی مہینہ 14/5 وقت 20:05 تا مورن 14/5 اس وقت  
اس وقت گنئی ملہر زمین ننگر - فارغ از ڈوئی ملہر زمین گنئی میں موجود ہے  
جیلو ڈوئی تان بیٹا توئی رہنے تھا کی جاکر ننگرانی کی - صاف گنئی میں ننگر  
ٹھکانہ 1057 عدم موجودی وقت صرف اورش غیر حافظی رنج مہینہ  
کی ناقص - آخر میں حاصل بیان لیا جائیگا

ضمان علی  
تعلیمی مہینہ لائل  
AMHC-PL-Swat  
9-5-2014

Six,  
Forwarded  
Co. PC - Swat  
9-5-2014

ATTESTED  
Deputy Superintendent of Police Legal  
Swat



میان آرائی تحریریں ASI اور ایش کے ناموں

میان ہے کہ ایکٹ لکھان 1057 جولائی 1968ء، تاریخ 14/7/68

میں اصول کاغذی سے لکھو جو کہ غیر عام ہو کر لکھو جو الہ 39

روايات 1/4 عام آئے جس میں ہر وقت درج ہوتا ہے

شہر میں تنخواہ و حکمانہ رقموں کا ازالہ صورت میں

میں کا ہے

میں جو، عا، کا غیر عام نہیں اس سے پہلے ہی میں جو، جولائی 1959

افزایا 20/14 سے صورت 24/2 کا کل (20) اور غیر عام

میں جسے انگریزی میں SP کے نام سے لکھ کر لکھا ہے

میں سے میں میں سے جو کہ لکھا ہے

LG/MAS, Jir: Swat  
OP-05-2014

تحریر

Attested

ATTESTED

*[Signature]*

Deputy Superintendent of Police Legal Swat.

*[Signature]*  
DSP. City  
9-5-2014

بیان اذان کتبیل رقم نمبر 1057 پولیس لائن سوات حال مکانہ سوات

۲۰۱۰ء میں بیان کیا گیا۔

میں تقریباً ۲۸-۰۹-۲۰۱۰ء کو سوات پولیس لائن سوات میں واقعہ کے بارے میں جانکاری دی گئی۔

میں نے ۲۸-۰۹-۲۰۱۰ء کو سوات پولیس لائن سوات میں واقعہ کے بارے میں جانکاری دی گئی۔

میں نے ۲۸-۰۹-۲۰۱۰ء کو سوات پولیس لائن سوات میں واقعہ کے بارے میں جانکاری دی گئی۔

میں نے ۲۸-۰۹-۲۰۱۰ء کو سوات پولیس لائن سوات میں واقعہ کے بارے میں جانکاری دی گئی۔

میں نے ۲۸-۰۹-۲۰۱۰ء کو سوات پولیس لائن سوات میں واقعہ کے بارے میں جانکاری دی گئی۔

میں نے ۲۸-۰۹-۲۰۱۰ء کو سوات پولیس لائن سوات میں واقعہ کے بارے میں جانکاری دی گئی۔

میں نے ۲۸-۰۹-۲۰۱۰ء کو سوات پولیس لائن سوات میں واقعہ کے بارے میں جانکاری دی گئی۔

میں نے ۲۸-۰۹-۲۰۱۰ء کو سوات پولیس لائن سوات میں واقعہ کے بارے میں جانکاری دی گئی۔

Attested

DSP - City  
12-5-04

ATTESTED  
Deputy Superintendent of Police Legat.  
Swat.

FINDING REPORTENQUIRY AGAINST CONSTABLE NOMAN M No.1507 JIS POLICE LINE SWAT..

It is an enquiry initiated against Constable Noman No.1057, entrusted to the undersigned for enquiry and report by competent authority vide order No.58/EB, dated 28/03/2014.

ALLEGATIONS:

It is alleged that the Constable Noman No.1057 while posted to Police Lines Swat absented himself from duty with out prior permission or leave vide D.D No.68 w.e.f 28-2-2014 as per report of lines officers, dated 15-03-2014.

PROCEDURE:

In this regard the relevant statements were taken( recorded), perused and placed on file.

1. Statement of MASI/L.O Muhammad Zeb JIS Police Lines Swat.
2. Statement of the alleged Constable Noman No.1507.

FINDINGS:

From the perusal of relevant record, and statements being an enquiry officer I have come to the conclusion that the alleged constable absented himself without prior permission or approved leave. But the alleged constable stated in their statement that I was ill and in this regard he presented medical documents which was perused and placed on file.

No doubt that alleged constable was ill but the alleged constable did not inform Muharrar in time that I am ill and unable to perform duty and remained absent for a period of (2) Months, (1) day and (5) Minutes.

RECOMMENDATION:

The absence period of alleged constable Noman No.1057 may be treated as without pay and warned to be careful in future.

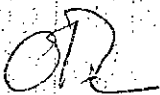
If agreed.



(SADDIQUE AKBAR DSP)

SDPO City Circle,SWAT.

12/05/2014.



DPO/Swat

ATTESTED



Deputy Superintendent of Police Legal  
Swat.

**DISCIPLINARY ACTION**

I **Mr. Sher Akbar S.St, P.S.P District Police Officer, Swat** as competent authority, is of the opinion that he **Constable Noman No.1057** while posted to **Police Station Matta** has rendered himself liable to be proceeded against departmentally as he has committed the following acts/omissions as defined in Rule 2 (iii) of Police Rules 1975, as per Provincial Assembly of Khyber Pakhtunkhwa Notification No. PA/Khyber Pakhtunkhwa/ Bills/ 2011/ 44905 dated 16/09/2011 and C.P.O, K.P.K Peshawar Memo: No. 3037-62/Legal, dated 19/11/2011.

**STATEMENT OF ALLEGATIONS**


It has been reported that he while posted to **Police Station Matta** committed the following act / acts, which is / are gross misconduct on his part as defined in Rules 2 (iii) of Police Rules 1975.

That he **Constable Noman No.1057** while posted to **Police Station Matta** has absented himself from duty without prior permission or leave vide D.D. No.40 w.e.f. 23-05-2014 up till now as per report of SHO Police Station Matta dated 07-06-2014.

2. For the purpose of scrutinizing the conduct of the said officer with reference to the above allegations, **SDPO/Khwaza Khela Circle, Swat** is appointed as Enquiry Officer.

3. The enquiry officer shall conduct proceedings in accordance with provisions of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused officer, record its findings and make within twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused officer.

4. The accused officer shall join the proceedings on the date, time and place fixed by the enquiry officer.


  
District Police Officer, Swat

No. 126 /EB, Dated Gulkada the, 10.7 2014.

Copy of above is forwarded to the:-

1. **SDPO/Khwaza Khela Circle, Swat** for initiating proceeding against the accused Officer/ Official namely **Constable Noman No.1057** under Police Rules, 1975.
2. **Constable Noman No.1057 Police Station Matta.**  
With the direction to appear before the Enquiry Officer on the date, time and place fixed by the Enquiry Officer for the purpose of enquiry proceeding.

\*\*\*\*\*

**ATTESTED**  
  
Deputy Superintendent of Police Legal  
Swat.

No = 1247-R.

11-7-2014

**CHARGE SHEET**

I Mr. Sher Akbar S.St P.S.P District Police Officer, Swat, as competent authority, hereby charge you, Constable Noman No.1057 while posted to Police Station Matta as follows:-

It has been reported that you committed the following act/acts, which is/are gross misconduct on your part as defined in Rules 2 (iii) of Police Disciplinary Rules 1975.

You Constable Noman No.1057 while posted to Police Station Matta have absented yourself from duty without prior permission or leave vide D.D. No.40 w.e.f. 23-05-2014 up till now as per report of SHO Police Station Matta dated 07-06-2014.


2. By reasons of the above, you appear to be guilty of misconduct and rendered yourself liable to all or any of penalties specified in Rule-4 of the Disciplinary Rules 1975.

3. You are, therefore, required to submit your written reply within seven (7) days of the receipt of this Charge Sheet to the Enquiry officer.

4. Your written reply, if any, should reach the Enquiry Officer within 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 as to whether you desire to be heard in person or not.


6. A statement of allegations is enclosed.

  
District Police Officer, Swat

No. 126 /E,

Dated: 10-7 /2014.

**ATTESTED**

  
Deputy Superintendent of Police Legat,  
Swat.

کھانا

نقل 40 اور 3 23 5/14

40 گریڈ طراز میں 18:00 کے صوفے 23 5/14 اس وقت گئی طراز میں  
کی جی ٹی گئی عدالت کے لیفٹننٹ 1057 عمر جو ریٹائر ہو گئے  
اور ان غیر ملکی غیر ملکی ریٹائر ہو گئے

سب سے پہلے

نقل عدالت میں

*(Signature)*  
mm ps mall  
6-6-19

ATTESTED

*(Signature)*

Deputy Superintendent of Police  
Swat.

1057

درخواست دربارہ قلم کاروں کی

مناظرہ

جو کہ منسوخ نقل حد بندی آبران کنٹریل لگان 1057 در سٹور شدہ  
ہے اور بازی کی کوئی امید نہیں ہے۔ منسوخ ہونے کے بعد اس پر عمل نہیں

ہذا اس کے ساتھ ہی کنٹریل لگان 1057 کا خلاف قلم کاروں کی  
مبارزاتی عمل کا حلیہ جاری ہے

MA81 PS. motta  
7 6-2014

Sub forwarded PL

SPo/matta  
9/6/14

SAY  
forwarded  
insp SHO motta  
7-6-2014

ATTESTED  
*[Signature]*

Deputy Superintendent of Police Legal,  
Swat.

may stopped Issue charge sheet

OB. No 111  
26-6-14


*[Signature]*  
DPO Swat  
23-6-14

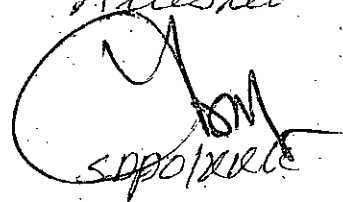
بیان رتفہ عدالت 1057

بیان رتفہ عدالت 1057 کو 4 فروری 2014ء

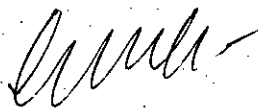
23/5/14 سے رتفہ عدالت کے تحت

حفاظت میں رکھی گئی ہے۔

  
MASID Bhatta  
17-7-014

Attested  
  
SPPOL/1000  
17.7.2014

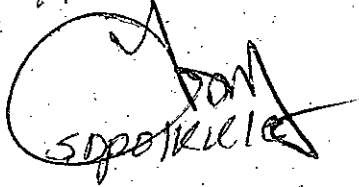
ATTESTED




Deputy Superintendent of Police Legal.  
Swat.



بیان ازین آفریدہ ایکریٹو ہونے پر متعلقہ قاعدے  
بیان کیا کہ اس کے تحت 1057 نمبر کے تحت 40 اور 40  
سے پر سٹور ٹیمپورری اور اس کے ساتھ ساتھ اس کے  
تحتیٰ میں بیان ہے کہ  
140 P.S. Matla  
17/7/014

Attested  
  
17-2-2014

ATTESTED  
  
Deputy Superintendent of Police Legat  
Swat.

فائینڈنگ رپورٹ

صوبہ عالی / جوالہ مشورہ چارج شیٹ / ڈسپنری (مستین عدیری) 126/E فارم صوابت DPO صاحبہ  
10.7.2014

برصلاط کنٹریبل نعتان 1057 سٹانڈ منڈ معروف منڈت ہوں۔ کہ

الزام علیہ کنٹریبل بالا کو گھری برودانہ بنام SHO صاحبہ سٹانڈ منڈ بھوچو ابالیا۔  
مستین کنٹریبل مذکورہ تاحال حاضر نہ آتا۔ اس بابت اچھری علی خان اسپیکر SHO اور  
قرر اشرف علی سٹانڈ منڈ نے اپنے بیانات میں واضح کیا۔ کہ کنٹریبل نعتان 1057 جوالہ 40  
روز ناچہ 5 سے بر سوور علیہ حاضر ہے۔ تاحال حاضر نہ ہئی ہے۔  
2014

حالات واقعات سے میں اس نتیجہ پر پہنچا ہوں۔ کہ کنٹریبل نعتان 1057 سٹانڈ منڈ  
سے جوالہ 43 روز ناچہ 5 سے بر سوور علیہ حاضر ہے۔ تاحال حاضر نہ ہئی ہے۔ اور  
2014

مذ بیان دینے کیلئے حاضر ہوا۔ مستین عدیری کی سفارش کی جاتی ہے۔

*[Signature]*  
SDPO/KK/EC  
24.7.2014

big

The above name Constable is  
habitual absentee. (03) three  
departmental Enquiries was  
initiated against them.

Assented to self for duty

- 1) w.e.from. 28-01-2014 } To (20) days
- To. 24-02-2014 }
- 2) w.e.from. 28. 2. 2014 } 2 Months
- To. 01-05-2014 }
- 3) w.e.f. 23-05-2014

ATTESTED

*[Signature]*  
Deputy Superintendent of Police Legal  
Swat.

To date :

He was called in orderly room  
time and again. But not appear  
and no sign of him X

*[Large handwritten signature]*

1057

ORDER

This order will dispose off the departmental enquiry against Constable Noman No.1057 who while posted to JIS Police Lines has absented himself from his lawful duty without prior permission or leave w.e.f. 28-01-2014 to 24-02-2014 again from 28-02-2014 to 01-05-2014 (Total 02 months, 27 days, 23 hrs and 50 minutes) and while posted to Police Station Matta has absented himself from 23-05-2014 up till now.

He was issued Charge Sheets alongwith statements of Allegations and SDPO/City Circle; SDPO/Madyan Circle and SDPO/Khwaza Khela Circle were deputed as Enquiry Officers. The Enquiry Officers conducted proper departmental Enquiries against the delinquent officer and recorded the statements of all concerned officers. They have provided ample opportunity to the delinquent officer to defend the absence rendered by him. After conducting proper departmental enquiries, the Enquiry Officers submitted their findings wherein they recommended the delinquent Constable for treating absence period as leave without pay, warning to be careful in future and for major punishment respectively. He was called in Orderly Room. But he could not appear to present plausible defense for his unlawful absence.

Having perused his service record, it was patently evident that the delinquent officer Constable Noman No.1057 is addicted to a chronic absentee and is not interested to continue his service. Foregoing in view the undersigned is of considered opinion that there are no chances that Constable Noman No.1057 become an efficient Police Officer. His further retention in service is bound to affect the discipline of the entire force. Therefore, in exercise of the powers vested in the undersigned under Rules 2 (iii) of Police Disciplinary Rules-1975, I, Sher Akbar, S.St, P.S.P, District Police Officer, Swat as a competent authority, am constrained to award him the punishment of Removal from service from the date of absence.

Order announced.

District Police Officer, Swat

O.B. No. 137

Dated 15/8 /2014.

\*\*\*\*\*

**ATTESIED**

Deputy Superintendent of Police Legal  
Swat.

# Before the Services Tribunal KPK (Mingora) Swat.

Services Appeal No. 1329 / 2015

Numan Khan .....Appellant

Versus

Regional Police Officer and others.....Respondents

## Re-joinder to the comments of Respondents, on behalf of Appellant.

As to Preliminary objections.

1. Para 1 is incorrect and denied.
2. Para 2 is incorrect and denied.
3. Para 3 is incorrect and denied.
4. Para 4 is incorrect and denied.
5. Para 5 is incorrect and denied.

As to comments on facts.

1. Need no comments.
2. Para 2 is incorrect and denied. The inquiry officer after considering the situation recommended absentee without pay but the respondents shut their eyes on the recommendation of the inquiry report.
3. Para 3 is incorrect and denied however the inquiry fixed negligence which does not amount misconduct and the appellant may be pardon.
4. No comments.
5. No comments.

As to comments on grounds.

- I. Para I is incorrect and denied, no opportunity was given to consult counsel.
- II. Para II is incorrect and denied.
- III. Para III is incorrect and denied.
- IV. Para IV is incorrect and denied, no opportunity was given to consult counsel.
- V. Para V is incorrect and denied.
- VI. Para VI is incorrect and denied.

It is therefore requested that appeal of the Appellant may be allowed and the Appellant may order to be re-instated on his post.


Appellant  
Through Counsel

  
Mohammad Ayaz Majid

Affidavit.

It is solemnly affirm and state on oath that all the contents of re-joinder are correct to the best of my knowledge and belief and nothing has been kept concealed from the honorable tribunal.

  
Deponent

  
**IRFAN MUHAMMAD**  
Oath Commissioner  
District Courts Batkhela  
Date: 14-12-2016

**"A"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

APPEAL No..... 1329 ..... of 20 15.

*TB  
Sweat*

Numan Khan

Appellant/Petitioner

Versus

RPO Malakand Sweat

RESPONDENT(S)

Notice to Appellant/Petitioner Numan Khan. S/O Amrullah  
R/o Mahallah Aji Khel Village  
Aladand Teh: Butkhela Distt  
Malakand.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 13-1-2016 at 8:00 AM.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

*(at camp court Sweat)*

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.