

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 3917/2021

BEFORE: KALIM ARSHAD KHAN --- CHAIRMAN
MIAN MUHAMMAD --- MEMBER(E)

Bilawal No. 68/Ex-FC S/o Shafiquehman R/o Ghari Habibullah Row
Tehsil and District Abbottabad and Mansehra..... (*Appellant*)

VERSUS

1. Government of Khyber Pakhtunkhwa, Peshawar through Secretary Home and Tribal Affairs Department.
2. Inspector General of Police, Khyber Pakhtunkhwa Peshawar.
3. District Police Officer, Mansehra.
4. Regional Police Officer Hazara at Abbottabad.....(*Respondents*)

Present:

MUHAMMAD SADDIQ,
Advocate

--- For Appellant.

NASEER-UD-DIN SHAH,
Assistant Advocate General

--- For respondents.

Date of Institution.....19.02.2021
Date of Hearing.....05.01.2023
Date of Decision.....05.01.2023

JUDGEMENT

MIAN MUHAMMAD, MEMBER(E):- The instant service appeal has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 with the prayer that “on acceptance of this appeal both the impugned orders may kindly be set aside and the appellant may very kindly be reinstated/restored in service alongwith all back benefits”.

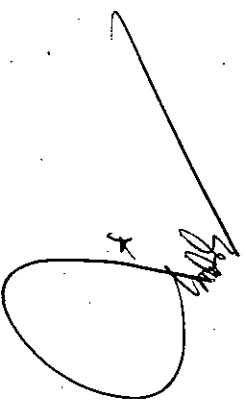
02. Brief facts of the case as averred in the service appeal, are that the appellant was appointed in the respondent department as Constable.

on 30.08.2007. He was dismissed from service vide order dated 24.04.2020 on the allegation of absence from duty. Feeling aggrieved, the appellant filed departmental appeal, which was turned down vide appellate order dated 22.06.2020 thereafter, the appellant submitted Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975, on 16.11.2020 which also met the same fate and was rejected vide order of the respondent No. 2 dated 03.12.2020. Hence the appellant has filed the instant service appeal on 19.02.2021 by invoking jurisdiction of this Tribunal against the impugned orders which is under judicial scrutiny before this Bench.

03. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions raised by the appellant in his appeal. We have heard arguments of learned counsel for the appellant as well as learned Assistant Advocate General for the respondents and have gone through the record with their valuable assistance.

04. Learned counsel for the appellant contended that father of the appellant was suffering from chronic cancer, therefore, he was not able to attend the job and perform his duty. His absence was not intentional but it was due to the reason of looking after his ailing father, being the only male member in the family. He next argued that the appellant had already submitted two applications for 15 days and 30 days leave but he was verbally informed that his leave applications were allowed. It was vehemently contended that neither any charge sheet/statement of allegations nor any Show Cause Notice was ever served upon the

appellant and the inquiry proceedings were conducted in absence of the appellant. No codal formalities were fulfilled and the appellant was condemned unheard. He further argued that before passing the impugned order of dismissal from service of the appellant, mandatory provisions of the Khyber Pakhtunkhwa Police Rules, 1975 were not complied with which has rendered the impugned orders as illegal, without law and have no force of law, may therefore, be set aside and the appellant be reinstated in service with all back benefits, he concluded.



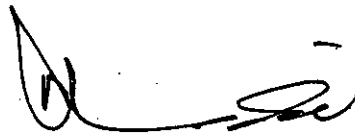
05. Learned Assistant Advocate General for the respondents controverted the assertions contained in the service appeal as well as arguments of learned counsel for the appellant and contended that performance of the appellant was not up to the mark. He was habitual absentee and had bad service record who was previously awarded numerous minor penalties including imposition of major penalty of dismissal from service twice. The service record of the appellant coupled with bad entries had brought bad name to the police department. Moreover, the appellant had never submitted application for leave and remained absent from duty without prior permission or sanction of leave from the competent authority which is a gross misconduct unbecoming of a personnel of the discipline force. He further argued that proper inquiry was conducted into the allegations against the appellant and he was also provided ample opportunity of self defense through personal hearing but he failed to prove his innocence. Since all the requisite codal formalities were fulfilled before passing the impugned order, the appeal in hand may therefore, be dismissed.

06. Perusal of the record reveals that the appellant while posted as GD Police Lines Mansehra was absent from duty w.e.f. 30.01.2020 to 26.02.2020 (28 days) and he absented himself from duty w.e.f. 28.02.2020 to 17.03.2020 (18 days) without any leave or permission as personnel of disciplined force. He was issued charge sheet and summary of allegations on 03.03.2020 and Inspector legal was appointed as enquiry officer by respondent No. 3. The enquiry officer, after scrutiny of the conduct of appellant including personal hearing, submitted his report whereafter the competent authority (respondent No. 3) imposed upon the appellant, the major penalty of "dismissal from service" vide impugned order dated 24.04.2020 after completion of the codal formalities under the provisions of Khyber Pakhtunkhwa Police Rules, 1975.

07. It is a matter of the record that father of the appellant was a cancer patient, who remained under treatment at the Institute of Nuclear Medicine Oncology and Radiotherapy (INOR) Abbottabad during October, 2010 and September 2014, whereas he remained absent from duty during January-March 2020 for 46 days. Rest of the medical documents attached with the service appeal are either in respect of his mother or his spouse. So, the plea taken in the service appeal is self-defeated and untenable even on this score. It is also responsibility of a civil servant to get his leave sanctioned from the competent authority in advance and only then he can avail or proceed on leave. Here leaving behind him an application for leave does not absolve him of the misconduct which he has exhibited from his conduct and that too, when his claim to have submitted leave application, is denied by the respondents.

08. As a sequel to the above, we find that the requisite codal formalities have been completed before imposition of the major penalty of dismissal from service, upon the appellant and the appellant could not make his case on merit before the Tribunal. The service appeal in hand is, therefore, dismissed. Consign.

09. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 05th day of January, 2023.*



(KALIM ARSHAD KHAN)
CHAIRMAN



(MIAN MUHAMMAD)
MEMBER (E)

ORDER

05.01.2023

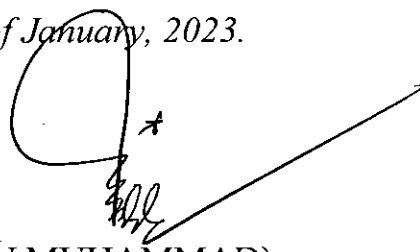
Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Arguments heard and record perused.

02. Vide our detailed judgement of today separately placed on file consisting of (05) pages, we find that the requisite codal formalities have been completed before imposition of the major penalty of dismissal from service, upon the appellant and the appellant could not make his case on merit before the Tribunal. The service appeal in hand is, therefore, dismissed. Consign.

03. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 05th day of January, 2023.*


(KALIM ARSHAD KHAN)
CHAIRMAN


(MIAN MUHAMMAD)
MEMBER (E)

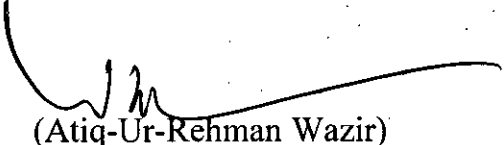
9.11.2022

Since 9th November has been declared as public holiday, case is adjourned to 05.01.2023 for the same as before.


Reader

10.01.2022


Appellant alongwith his counsel present. Mr. Kabirullah Khattak, Addl. AG alongwith Gul Shahzad SI (Legal) for respondents present and submitted reply/comments which are placed on file and copy of the same is handed over to the learned counsel for the appellant. To come up for rejoinder if any, and arguments before the D.B on 26.04.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)

26.04.2022

Learned counsel for the appellant present. Mr. Gul Shehzad, S.I (Legal) alongwith Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

After hearing arguments at certain length, it transpired that complete record of inquiry has not been submitted, therefore, representative of the respondents shall positively produce copy of complete inquiry record on the next date. To come up for arguments on 24.05.2022 before the D.B.


(Rozina Rehman)
Member (J)


(Salah-ud-Din)
Member (J)

24th May, 2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG for the respondents present.

Learned AAG seeks further time to produce before the court complete inquiry record and requested for short adjournment. Last chance is given. To come up for record and arguments on 09.08.2022 before the D.B.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

9-8-2022 Due to the Public holiday the case is adjourned to 9-11-2022
M.A.

12.07.2021

Learned Addl, A.G be reminded about the omission and for submission of reply/comments within extended time of 10 days.


Chairman


Stipulated period passed reply not submitted.

14.09.2021

Appellant present through counsel.

Muhammad Adeel Butt learned Additional A.G for the respondents present.

Reply on behalf of respondents is still awaited. Learned A.A.G made a request for time to furnish reply/comments. Request is accorded with direction to furnish the same in office within 10 days positively. To come up for arguments on 10.01.2022 before D.B.


(Rozina Rehman)
Member (J)


Chairman



27.05.2021

Counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing subject to all legal objections available to the respondents. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices positively. If the written reply/comments are not submitted within the stipulated time, the office is required to submit the file with a report of non-compliance. File to come up for arguments on 14.09.2021 before the D.B.

Appellant Deposited
Security & Process Fee

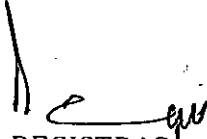


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 3917 /2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/03/2021	<p>The appeal of Mr. Bilawal resubmitted today by Mr. Muhammad Saddiq Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	01/4/21	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>27/05/21</u></p> <p style="text-align: right;"> CHAIRMAN (for completion) (ou post facto)</p>

The appeal of Mr. Bilawal Ex-FC No. 68 District police Mansehra received today i.e. on 19/02/2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- 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.
- 2- Appeal has not been flagged/marked annexures' marks.
- 3- Annexures of the appeal may be attested.
- 4- Memorandum of appeal may be got signed by the appellant.
- 5- Copy of revision petition is not attached with the appeal which may be placed on it.
- 6- Copy of compulsorily retirement order mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 7- Six more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 384 /S.T,

Dt. 22/2 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Muhammad Saddiq Adv. Pesh.

Respected sir,


objection raised have been removed,
M-Saddiq Adv.

M Adv. 11³/₂₀₂₁

Respected sir,

The present appeal was returned due to some objection, but I need further time for submission of appeal.

15 days time further extended


11/3/2021

BEFORE THE HONOURABLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Services Appeal No. _____/2021

BILAWAL

VERSUS

Govt of Khyber Pakhtunkhwa etc


SERVICE APPEAL

INDEX

S.No	Description	Annexure	Pages
1.	Grounds of appeal		1-5
2.	Affidavit		6
3.	Addresses of parties		7
4.	Appointment order	A	8-9
5.	Copy of Dismissal order dated 24.4.2020 and departmental appeal	B,C	10-12
5	Copy of dismissal order of departmental appeal order dated 22.6.2020	D	13
6.	copy dismissal order of revision petition 3.12.2020	E	14
7.	Copy of applications for grant of leave	F & G	15-16
8	Copy of charge sheet & reply	H	17_18
9	Final show cause notice & reply	I	19_20
10	Formal departmental inquiry report	J	21
11	Copy of medical certificate	K	22-39
12	Wakalatnama		40

Appellant

Through


MUHAMMAD SADDIQ

Advocate, High court Peshawar

①

BEFORE THE HONORUABLE SERVICES TRIBUNAL KHYBER

PAKHTUNKHWA PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 2950

Services appeal No. 3917 /2021 Dated 19/2/2021

Bilawal No 68/ Ex -Fc S/O Shafiqurehman R/O Ghari Habibullah Row
Tehsil and District Abbott bad And Manshra

... Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa, Peshawar through secretary Home and Tribal Affairs Department.
2. Inspector General of Police, Khyber pakhtunkhwa Peshawar.
3. District police officer, Mansehra ~~at Abbott bad.~~
4. Regional police officer Hazara at Abbott bad.

~~at Mansehra, District Police Office, Peshawar~~

...
RESPONDENTS

SERVICE APPEAL:-

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974
AGAINST THE ORIGINAL ORDER OB NO. 97, DATED
24.4.2020, THROUGH
WHICH THE APPELLANT HAS BEEN ~~DISMISS~~
~~FROM~~ FROM SERVICE WITH IMMEDIATE EFFECT
AND THEREAFTER THE APPELLANT FILED
DEPARTMENTAL APPEAL ON 22.6.2020 VIDE DIARY
NO. 14488 RPO HAZARA .ABBOTTABAD WHICH IS
DISMISSED ON THE SAME DATE 22.6.2020 AND
ALSO FILED REVISION PETITION BEFORE THE
INSPECTER GENERAL KPK PESHAWAR.ON DATED

Filed to-day
Registrar
19/2/2021

Re-submitted to-day
and filed.

Registrar
19/2/2021

2

16.11.2020.WHICH WAS DISMISSED ON DATED
3.12.2020

PRAYER:

ON ACCEPTANCE OF THIS APPEAL BOTH THE
IMPUGNED ORDERS MENTIONED ABOVE MAY VERY
KINDLY BE SET ASIDE AND THE APPELLANT MAY
VERY KINDLY BE RE-INSTATED / RESTORED IN
SERVICE ALONG WITH ALL BACK BENEFITS

Respectfully Sheweth ,

1. That the appellant has been appointed on 30.08.2007 in the department of respondents as FC- with no 1141, and performed his duties with full zeal and keen interest till date to the satisfaction of his superiors. (Copy of the appointment order is enclosed as annexure A).
2. That during the service the appellant has performed his duties honestly and never gives any chance of complaint to his high-up.
3. That during this process the appellant was dismissed from service vide order OB No. 97 dated 24.04.2020 which was impugned by the appellant through departmental appeal but the same was dismissed vide no. 14489/PA dated 22.06.2020 (Copy of order dated 22.06.2020 and departmental appeal are annexure A & B respectively). (B, C)
4. That after dismissal of departmental appeal appellant filled revision petition under rule -A of Khyber pukhtunkhuwa police Rule -1975 before INSPECTORE GENERAL of police kpk

(3)

Peshawar no 45340 on dated 16.11.2020 the same was also dismissed on dated 03.12.2020 (Copy of orders are attached as annexure C & D). (D & E)

5. That without inquiry the appellant was ~~dismissed~~ from service vide order dated 24.04.2020 (Copy of order dated 24.04.2020 is annexure E). (E)
6. That the appellant has submitted two applications for leave for 15 days and 30 days and the respondent orally stated that your applications are allowed and don't worry about your service and the appellant has not wait for the order of the acceptance both the applications and later on received information about dismissal from service. (copies of applications are attached as annexure F & G) (F), G
7. That the absence of the appellant was not willingly but due to father of the appellant suffering from cancer daises and therefore the appellant was not able to attained the job on those days therefore the appellant submitted two applications respectively and also orally said by respondent that your applications are allowed. (medical certificate is attached annexure : H) (H)
8. That no evidence has been recorded nor has the statement of the appellant been recorded by the inquiry officer.
9. That no show cause notice nor statement of allegation nor any charge sheet, given to the appellant prior to the passing of the impugned order dated 24.04.2020.
10. That the appellant is the only source of income of his family as such cannot be deprived from his service on the basis of mere surmises, conjectures, assumption and presumptions.
11. That the legal formalities have not been observed before passing the impugned order dated 24.04.2020. As such

4

the entire proceeding is nullity in the eyes of law and the impugned order needs to be set aside on all the grounds mentioned above.

12. That the appellant having no other alternate remedy filed the instant appeal before this Honorable Tribunal inter alia: -

GROUND: -

- A. That the impugned order is against the law and facts, cannon of natural justice, hence liable to be set aside.
- B. That the appellant has been condemned unheard as no opportunity of personal hearing is given to the appellant by the respondents and on this score along both the impugned orders needs to be set at naught.
- C. That the appellant has an unblemished service record and has served the department to the entire satisfaction of his superiors, neither is involved previously in any criminal case, nor remained absent from his services, nor has received any adverse remarks throughout his services.
- D. That before issuance of impugned order, the appellant was not served upon with any show cause notice, statement of allegations, charge, neither any publication has been made against the appellant, nor the appellant has been contacted in central jail Peshawar through superintendent jail, and as such the appellant has been condemned unheard, which is not only against the law, but is also against the golden principles of Natural justice.
- E. That the appellant is also not associated with the inquiry proceedings and the same is conducted in the absence of appellant.
- F. That absence of the appellant from his duty was not willful but was due to the unavoidable circumstances mentioned above as

5

such the impugned order is liable to be set aside on this sole score.

- G. That keeping in view the above law and facts, the appellant is entitled for re-instatement in his services along with all back benefits, keeping in view the facts that the impugned order of dismissal is totally against the law and facts, hence liable to be set aside.
- H. That the appeal in hand as well as departmental appeal is within time.
- I. That other point would be raised at the time of arguments with the permission of this Honorable Court.

It is, therefore, most humbly prayed that on acceptance of this appeal the impugned order mentioned above may very kindly be set aside and the appellant may very kindly be reinstated in service along with all back benefits.

Dated: 18.02.2021

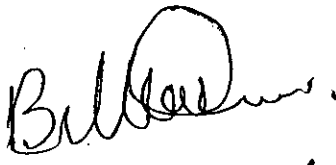
Appellant
Through


MUHAMMAD SADDIQ
Advocate, High Court Peshawar

CERTIFICATE:

Certified that no such like appeal has earlier been filed before this Honorable Court.


Advocate


Deponent:



BEFORE THE HONOURABLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Services Appeal No. _____/2021

BILAWAL

VERSUS

Govt of Khyber Pakhtunkhwa etc

AFFIDAVIT

I, Bilawal No 68/ Ex -Fc S/O Shafiqurehman R/O Ghari Habibullah
Row Tehsil And District Abbott Bad And Manshra

hereby solemnly affirm and declare on oath that the contents of the
instant appeal are true and correct to the best of my knowledge and
belief and nothing has been concealed from this Honorable Court

Identified by:

Muhammad saddiq
Muhammad saddiq

Advocate, High Court Peshawar

Deponent

Bilawal



19-02-2021

(8) (7)

BEFORE THE HONOURABLE SERVICES TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR

Services Appeal No. _____ /2021

BILAWAL

VERSUS

Govt of Khyber Pakhtunkhwa etc

ADDRESSES OF PARTIES

ADDRESS OF APPELLANT:

Bilawal No 68/ Ex -Fc S/O Shafiqrehman R/O Ghari Habibullah Row
Tehsil and District Abbott bad And Manshra


ADDRESSES OF RESPONDENTS:

1. Government of Khyber Pakhtunkhwa, Peshawar through secretary Home and Tribal Affairs Department.
2. Inspector General of Police, Khyber pakhtunkhwa . Peshawar.
3. District police officer, Mansehra at Abbott bad.
4. Regional police officer Harara at Abbott bad .
5. Superintendent of Police Head Quarter, Peshawar.

...Government of Khyber

Through

Appellant



MUHAMMAD SADDIQ

Advocate, High court Peshawar

8

257 353



POLICE DEPARTMENT

MANSEHRA DISTRICT

ORDER

9147585-125

As approved by the Recruitment Committee consisting of DSP Headquarter Mansehra and DSP Oghi under the chairmanship of Mr. Muhammad Waqas Nazir District Police Officer Mansehra, the following candidates have qualified/selected for recruitment by the said committee. They are appointed as constable in BPS-5 (Rs. 2415-115-5865) against the vacancies of Mansehra district with effect from 28.7.2021. Their appointments are purely on temporary basis and are liable to be terminated any time.

They are allotted constabulary Nos. noted against their names.

S. NO	Name	Father Name	Address	Number Allotted
1	Sharyar Rauf	Abdul Rauf	Village Tarkanal Tehsil & District Mansehra	816
2	Junaid Ali	Muhammad Ayub Khan	Village Atershisha Tehsil & District Mansehra	817
3	Abdul Qadir	Gul Zaman	Village Narber Tehsil & District Mansehra	818
4	Adil	Ali Asghar	Village Mundhar Tehsil & District Mansehra	819
5	Amir Shahzad	Malik Kala Khan	Village Karer Tehsil & District Mansehra	820
6	Muhammad Hamraz	Muhammad Ayub	Village Gilwal Tehsil & District Mansehra	821
7	Syed Arsalan	Fida Hussain Shah	Village Mobaian Tehsil & District Mansehra	822
8	Junaid Mehmood	Khalid Mehmood	Village Bherkund Tehsil & District Mansehra	823
9	Shoaib Khan	Syed Khan	Village Dana Jagir Tehsil Balakot District Mansehra	824
10	Muhammad Yasir	Ali Gohar	Village Jinkari Tehsil & District Mansehra	825
11	Anjum Shahid	Muhammad Haroon	Village Sugdar Tehsil Balakot District Mansehra	826
12	Zaheer Ahmed	Habibullah Khan	Village Potha Tehsil & District Mansehra	827
13	Ghulam Farooq	Ghulam Jilani	Village Chattar Plain Tehsil & District Mansehra	828
14	Muhammad Uzair	Muhammad Nawaz	Village Karer Tehsil & District Mansehra	829
15	Badar-ul-Salam	Paristan	Village Kotli Bala Tehsil & District Mansehra	830
16	Yasir	Abdul Rashid	Village Pano Dehri Tehsil & District Mansehra	831
17	Adil Hussain	Sohrab Khan	Village Chitta Batta Tehsil & District Mansehra	832
18	Waqas Ahmed	Muhammad Farooq	Village Bantal Doraha Tehsil & District Mansehra	833
19	Muhammad Zeeshan	Muhammad Mumtaz	Village Mundhar Tehsil & District Mansehra	834
20	Muhammad Zaman	Mehboob	Village Timbri Tehsil & District Mansehra	835
21	Muhammad Basharat	Muhammad Yousuf	Village Phulra Tehsil & District Mansehra	836
22	Muhammad Saeed	Muhammad Sajjad	Village Jared Tehsil Balakot District Mansehra	837
23	Sohail Shahzad	Muhammad Aslam	Village Potha Pakhwal Tehsil & District Mansehra	838
24	Atif	Saif-ur-Rehman	Village Jaba Tehsil & District Mansehra	839
25	Qadeer Ahmed	Ghulam Siddique	Village Mangloor Tehsil & District Mansehra	840
26	Khurram Shahzad	Muhammad Rafique	Village Oger Tehsil & District Mansehra	841
27	Khurshid	Mian Dad	Village Qadar Noor Medan Tehsil & District Mansehra	842
28	Faheera Khan	Abdur Rashid	Village Sajwal Sharif Tehsil & District Mansehra	843
29	Shah Waliullah	Mehboob Shah	Village Jaloo Tehsil & District Mansehra	844
30	Syed Ghulam Qadir Shah	Syed Nazir Shah	Village Mobaian Tehsil & District Mansehra	845
		Muhammad Ashraf	Village Maswal Tehsil & District Mansehra	846
	ad Rizwan	Anwar Zeb	Village Shergarh Tehsil Oghi District Mansehra	847
		Naqeeb Ahmed	Village Dana Tehsil & District Mansehra	848

Waqas Nazir
 4/3/2021

Mansehra District
10/1/2021

91

172	Lal Khan	Khani Zaman	Village Basundh Tehsil & District Mansehra	987
173	Qamar Iqbal	Muhammad Iqbal	Mohallah Sain Abad Tehsil & District Mansehra	988
174	Javed Iqbal	Fazal-ur-Rehman	Village Trangri Tehsil & District Mansehra	989
175	Jameel Ahmed	Abdul Waris	Village Karer Tehsil & District Mansehra	990
176	Muhammad Zubair	Muhammad Farid	Village Mari Khankhail Tehsil & District Mansehra	991
177	Raja Naveed	Abdul Hameed	Mohallah Jandar Banda Tehsil & District Mansehra	992
178	Muhammad Banaris	Shah Zaman	Village Sehki Miana Tehsil & District Mansehra	993
179	Amanat Ali	Sarfraz	Village Lunda Mor Baffa Tehsil & District Mansehra	994
180	Muhammad Nasser	Abdul Ghafoor	Village Jaba Tehsil & District Mansehra	995
181	Muhammad Sajid	Muhammad Zaman	Village Hathi Maira Tehsil & District Mansehra	996
182	Munawar Khan	Ghulam Hassan	Village Janglan Tehsil & District Mansehra	997
183	Yawar Mehmood	Mustafa Khan	Village Sachan Khurd Tehsil & District Mansehra	998
184	Muhammad Javed	Sain Muhammad	Village Lissan Nawab Tehsil & District Mansehra	999
185	Ataf Hussain	Nazeer Hussain	Village Garhi Tehsil & District Mansehra	1000
186	Amir Zeb	Mian Ghulam Nabi	Village Jabba Tehsil & District Mansehra	1001
187	Babar Khan	Abdul Malik	Village Garwal Tehsil & District Mansehra	1002
188	Syed Sajjad Shah	Pir Ali Shah	Village Mohajan Tehsil & District Mansehra	1003
189	Khuram Zaman	Haider Zaman	Village Phulra Tehsil & District Mansehra	1004
190	Adeel Saeed	Muhammad Saeed	Village Hado Bandi Tehsil & District Mansehra	1005
191	Munir Ahmed	Muhammad Farooq	Village Phulkeri Tehsil & District Mansehra	1006
192	Zahir Hussain	Nazir Shah	Village Pairan Tehsil & District Mansehra	1007
193	Bilawal	Shafique-ur-rehman	Village Roo Tehsil Balakot District Mansehra	1008
194	Hashim Khan	Kala Khan	Village Sandesar Tehsil & District Mansehra	1009
195	Muhammad Shakeel	Abdul Jailil	Village Doga Tehsil & District Mansehra	1010
196	Waqar Hussain	Dildar Hussain	Village Bhalag Baja Tehsil & District Mansehra	1011
197	Muhammad Taimur	Muhammad Nazeer	Village Hado Bandi Tehsil & District Mansehra	1012
198	Umer Khatab	Abdul Qayum	Village Sandesar Tehsil & District Mansehra	1013
199	Ghulam Habib	Imam Qasid	Village Sherpur Tehsil & District Mansehra	1014
200	Musawar Shah	Manzoor Shah	Village Kher Abad Tehsil & District Mansehra	1015
201	Zaheer	Adam Khan	Village Nawan Sher Tehsil Oghi District Mansehra	1016
202	Basharat	Khalid	Village Dibgran Tehsil & District Mansehra	1017
203	Javed	Wali-ur-Rehman	Village Sachan Tehsil & District Mansehra	1018
204	Tahir Aslam	Muhammad Aslam	Village Nokoi Tehsil & District Mansehra	1019
205	Muhammad Yasir	Muhammad Rashid	Village Ogra Tehsil & District Mansehra	1020
206	Muhammad Peryez	Muhammad Shaukat	Village Lissan Thakral Tehsil & District Mansehra	1021
207	Adnan Shahzad	Muhammad Peryez	Village Chitta Batta Tehsil & District Mansehra	1022

Khudad
District Police Officer,
Mansehra

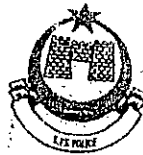
OBNO 135

Dated: 30.8.2021

M. Qadir
ATTESTED

4/3/2021

RA



10

POLICE DEPARTMENT

MANSEHRA DISTRICT

ORDERS

This office order will dispose off the departmental enquiry proceeding against Constable Bilawal No. 68 who was proceeded against departmentally with the allegation that while he was posted as GD Police Lines has absented himself from duty with effect from 30-01-2020 to 26-02-2020 (28 days) without any leave or permission vide DD No. 18 dated 21-02-2020 and also absented himself from duty with effect from 28-02-2020 to 17-03-2020 (18 days) while he was posted as GD Police Station Lassan Nawab without any leave or permission vide DD No. 14 dated 17-03-2020:-

The Enquiry Officer i.e. Mr. Akhlaq Hussain Shah Inspector Legal Mansehra after conducting proper departmental enquiry has submitted his report stating therein that, I being enquiry officer came to the conclusion that being member of disciplined force he was supposed to obtain proper leave or permission from his seniors, hence he is recommended for some Suitable Punishment punishment.

A final show cause notice was also issued to the delinquent Constable but his reply was found unsatisfactory. On 23.04.2020 the delinquent Constable Bilawal No. 68 was heard in person but he could not convince the undersigned in his defense.

I, the District Police Officer, Mansehra, therefore award major punishment of "dismissal from service" to the delinquent Constable Bilawal No. 68 under Khyber Pakhtunkhawa Police, Disciplinary Rules 1975 (amended in 2014). The period he spent without permission and leaves is treated as the period without duty so it does not attract any salary and other allowances.

Ordered announced.

OS 97
24-04-2020

DISTRICT POLICE OFFICER

District Police Officer
Mansehra

113/2024

28
18
46

کمیونٹی پولیس سٹیشن ضلع مانسہرہ

NO. 11165/12
dt. 7-5-2020

DPO Manshera

ضلع مانسہرہ کے لیے
68
FC

DPO Manshera
95

2083
11-5-20
Police Manshera

Office Of The Regional Police Officer
By No. 6594
Dated 07-05-2020
Hazara Region-II Abbottabad

یہ کہ سائل کیس نمبر 97 OB مورخہ 24/5/2020

مانسہرہ نے قحط سے ڈسپچارج کر دیا ہے۔ (حکامی نوٹ کیا گیا ہے)

12. یہ کہ سائل کیس نمبر 20 اور گھروں سے اطلاع ملی کہ سائل کیس

کا والہ صاحب بیچارہ اور فریب انگیز ہے۔ سائل کیس نمبر اطلاع

میں اس وقت پریشان ہو گیا ہے کیس نمبر مذکور نے قحط کی اطلاع

کو آگاہ کیا اور گھر فوراً روانہ ہو گیا۔ اور سائل کیس نمبر اطلاع

کو مختلف پستیوں میں لے کر گھومنا رہا ہے سائل کیس نمبر مذکور کو

غیر حاضر کا علم نہ تھا کیونکہ سائل کیس نمبر نے قحط کی اطلاع

مانسہرہ کو آگاہ کیا تھا اور قحط کی اطلاع نے کیا تھا کہ وہ سائل کیس

کا رخصت کر دے گا۔

13. یہ کہ سائل کیس نمبر غیر حاضر کا علم ہوا اور مورخہ 26/5/2020

حاضر ہوئے اور سائل کیس نمبر نے اطلاع اور گھر فوراً روانہ

کی اطلاع اور سائل کیس نمبر نے اطلاع اور گھر فوراً روانہ

MAAD ATTESTED

11/3/2021

اور والد صاحب کو بنگلہ دیش منتقل کر دیا گیا اور وہاں پر والد صاحب کی

دیگر کھال آتا رہا اور جیٹھے آدیات لف ایبل تھیں۔

(4) یہ کہ سائل اسٹیل کا والد صاحب کینسر کا مریض ہے اور سالہ لوشن

(5) یہ کہ سائل اسٹیل خرم $18 \frac{3}{20}$ اور کھانہ لسان نواب حسین ایسی ڈیولپمنٹ

جو سیکھا۔ اور اس طرح سائل سٹیل کے کل غیر ملکی ایک عمارت 165 دن

بستی ہے، سائل کے یہ غیر ملکی عقیدہ ہے کہ وہ سیکھ کر سائل
اور والد خود کا بیٹھاری کا وجہ سے ہوئی ہے۔

(6) یہ کہ سائل اسٹیل کے کل لوشن 3 سال بستی ہے اور سائل اسٹیل

ایئر 3 نے جو حکومت سے بولیں روٹر 1975 سے 2014 کا

اطلاق سائل اسٹیل پر لاگو نہیں ہوتا ہے حالانکہ سائل سٹیل سے تحقیق کے

درخواست جو الٹر ایٹو لوشن سالہ کو دی گئی تھیں اور بولیں لوشن

نے سٹیل مینڈر کے ساتھ کوئی تعاون نہیں کیا سیکھ غیر ملکی رد کیا گیا

(7) یہ کہ سٹیل مینڈر ایک ریٹائرڈ بولیں (مقرر کا بیٹا) ہے اور ایسی ڈیولپمنٹ

خوش الحالی سے دیکھا گیا۔ اور آئندہ بھی حالتان سے ڈیولپمنٹ

(8) نیز انہیں ایبل اسٹیل صاحب سائل اسٹیل کو دوبارہ ایسی ڈیولپمنٹ

حادثے اور سائل کے غیر ملکی without pay سے ہی D.P.O. صاحب نے اردی

سائل مینڈر کو دوبارہ ڈیولپمنٹ کے لیے کہا ہے

03450909938

68 ضلع مالیر 6
AT-100
Dad
AT-100



13

OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023



r.rpohazara@gmail.com



0345-9560687

NO: 14488 /PA DATED 22/06/2020

ORDER

This order will dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex. Constable Bilawal No. 68 of District Mansehra against the punishment order i.e. *Dismissed from Service* awarded by DPO Mansehra vide OB No.97 dated 24.04.2020.

Brief facts leading to the punishment are that the appellant while posted at Police Lines, Mansehra absented himself from duty without any leave or permission on the following occasions.

DD. No. & date	From	To	Absence
DD No. 18 dated 21-02-2020 Police Lines Mansehra	30-01-2020	26-02-2020	28 days
DD No. 14 dated 17-03-2020 Police Lines Mansehra	28-02-2020	17-03-2020	18 days
Total = 46 days			

The appellant was issued charge sheet alongwith summary of allegations and Inspector Legal was deputed to conduct departmental enquiry. The EO held the appellant responsible of misconduct. The appellant was issued Final Show Cause Notice and heard in person, however he failed to advance any cogent reason in his defence. Consequently, DPO Mansehra awarded him major punishment of dismissal from service.

After receiving his appeal, comments of DPO Mansehra were sought and examined/perused. The undersigned called the appellant in OR and heard him in person. However he failed to advance any plausible justification in his defence. Moreover it is pertinent to mention here that the appellant has been dismissed 3rd time in his service, which shows his disinterest in Government service. Therefore in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 the appeal is hereby *filed* with immediate effect.

ATTESTED

22/06/2020

Qazi Jamil ur Rehman (PSP)
REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

No. 14489 /PA, dated Abbottabad the 22-06 /2020.
CC.

1. The District Police Officer, Mansehra for information and necessary action with reference to his office Memo No.8792/GB dated 28-05-2020. Service Roll and Fuji Missal containing enquiry file of the appellant is returned herewith for record.



(14)

**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.**

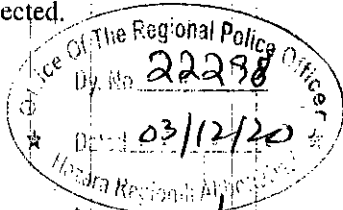
No. S/ 4531 /20, dated Peshawar the 16/11/2020.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-FC Bilawal No. 68. The petitioner was dismissed from service by District Police Officer, Mansehra vide OB No. 97, dated 24.04.2020 on the allegations of absence from duty w.e. from 30.01.2020 to 26.02.2020 (28 days) and again w.e. from 28.02.2020 to 17.03.2020 (18 days) for a total period 46 days. His appeal was filed by Regional Police Officer, Hazara vide order Endst: No. 14489/PA, dated 22.06.2020.

Meeting of Appellate Board was held on 03.11.2020 wherein petitioner was heard in person. Petitioner contended that his absence was not deliberate but his father was suffering from cancer disease.

Perusal of the record reveals that the petitioner was earlier twice dismissed from service vide order bearing OB No. 170, dated 18.10.2016 and OB No. 179, dated 12.10.2017 on the same allegations which establishes that he is habitual absentee and there is no prospects of mending his ways. The Board see no ground and reasons for acceptance of his petition, therefore, the Board decided that his petition is hereby rejected.



Sd/-

DR. ISHTIAQ AHMED, PSP/PPM
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. S/ 4532-40 /20,

Copy of the above is forwarded to the:

1. Regional Police Officer, Hazara at Abbottabad.
2. District Police Officer, Mansehra, One Service Roll alongwith one Fauji Missal/enquiry file of the above named Ex-FC received vide your office Memo: No. 15230/GB, dated 19.08.2020 is returned herewith for your office record.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
5. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

No. 31795/R
dt 3-12-20

(ZAHOOK BABAR AFRIDI) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

PA
FW mys. 3/12/20
SRP/OT
For n/a
DPO, Mansehra

1
Mans
3/12/20

DPO Mansehra
PA
ATETSTED
11/3/2021

دعواتِ مبارک، وقتِ صلواتِ مبارک اور دعا

فدائی

معرضِ خدمت ہے کہ سائل کا والد نیا ہیبت بیمار کا اور
سے ڈر رہتا ہے۔ جس دیکھو عیال بڑا و لا در دوسرا کوئی
نہیں نہ شخص کو جو جو دیکھیں ہے۔ یہیں وہ سائل کو وقت
فدائی اندر فرماتا ہے۔

۱۔ مڈر ایڈریس اسٹریٹ اسٹریٹ اسٹریٹ اسٹریٹ اسٹریٹ
فدائی غائب زمانہ ماضی صبار فرماتا ہے
عین خوش ہوگا

الہی

آپ کا نام مبارک ہے 68

30/01/2020

Sir,
Forwarded please

30/01/2020

ATETSTED
11/3/2021

دفعہ اولہ درجہ اولہ صوبہ سندھ

صوبہ سندھ

گورنمنٹ ہائی اسکول، ماہی آباد، ضلع سندھ، پاکستان
اور ماہی آباد، ضلع سندھ، پاکستان

مدرسہ اسلامیہ، ماہی آباد، ضلع سندھ، پاکستان
رہنما، ماہی آباد، ضلع سندھ، پاکستان
عین گورنمنٹ ہائی اسکول

الغرض

مدرسہ اسلامیہ، ماہی آباد، ضلع سندھ، پاکستان

28/02/2020

Sir

Forwarded By

MH

28/02/2020

MAACH
ATTESTED

4/3/2021

108

مکتور جناب

جواب چارج شیٹ نمبر 27/8 حروف 3/20

ضابطہ عالی

12. یہ سائل ایسٹل کے حروف 2/20 اور لکھنے سے اطلاع حاصل ہونے

کہ سائل کا والد بیت سخت بیمار ہے اور تریب المراد

13. یہ سائل ایسٹل کے حروف 3/20 اور لکھنے سے اطلاع حاصل ہونے

کہ سائل کا والد لکھنے کو بیکر ہسپتال میں لیا گیا اور مختلف

ہسپتالوں کا حکم لیا گیا تھا۔ طبی وجہ سے ڈیوٹی پر لایا گیا

نہ ہو سکا۔

13. یہ سائل ایسٹل کے حروف 3/20 اور لکھنے سے اطلاع حاصل ہونے

کہ سائل کا والد لکھنے کو بیکر ہسپتال میں لیا گیا اور مختلف

14. ایسٹل کے حروف 3/20 اور لکھنے سے اطلاع حاصل ہونے

کہ سائل کا والد لکھنے کو بیکر ہسپتال میں لیا گیا اور مختلف

سائل ایسٹل کے حروف 68/20 اور لکھنے سے اطلاع حاصل ہونے

Madan ATETSTED

11/3/2021

19

OFFICE OF THE DISTRICT POLICE OFFICER MANSEHRA

No. 38 /SRC Dated 07-04-2020

FINAL SHOW CAUSE NOTICE

You Constable Bilawal No. 68 absented yourself from duty on the following occasion without any leave or permission:-

1. 30-01-2020 to 26-02-2020 (28 days) while you were posted in Police Lines Manselira.
2. 28-02-2020 to 17-03-2020 (18 days) while you were posted as GD Police Station Lassar Nawab vide DD No. 14 dated 17-03-2020.

It shows that you are indisciplined and irresponsible police officers. It amounts to gross misconduct.

In this connection you were proceeded against the departmentally. Inspector Legal Manselira, after conducting proper departmental enquiry and submitted his finding report and proved the charges of willful absence against you. I am agree with the report of enquiry officer and therefore, hereby finally call upon you to show cause as to why you should not be awarded major/minor punishment under the Khyber Pakhtunkhwa Police Disciplinary Rules 1975 (amended in 2014). In case your written reply is not received within seven (07) days after the receipt of this final Show Cause Notice it shall be presumed that you have no defence to offer. You are also allowed to appear before me undersigned, if you so desire. (Copy of the finding of the enquiry officer is also enclosed).

District Police Officer,
Manselira

مشکوہ نامٹل شوکار نوٹس نئی 38/38
صرف 7/25 حایم جناب۔ ہلاکت۔ مہینہ کا گھوڑا دوسروں
زور سے ہیں۔

میں پریشانی میں ہزل روٹی پر لعینات تھا

میرا والہ کھینچتا رہا ہے جسے گھر سے اٹھنے سے
کہ والہ صبر کی طبیعت انتہائی خراب اور قریب اللہ ہے
اپنی طبیعت میں کھینچتی کہ تیرے گھر سے دور
جاؤں گا۔ صبر سے عالم کرانا اس قدر بہتر ہے
یا صرف 2/25

میرا پورے نئے نئے لہجے میں ہے۔ تمہاری لہجے کی
اسی لہجے کی دوبارہ والہ ہے۔ کی طبیعت خراب ہے۔

بہتر ہے۔ صبر سے 3/25 کہ میں نے اپنی حافرا کے
میں تقریباً ایک ماہ اور 16 دن صبر سے حافرا
تھوڑا سا جان بوجھ کر نہیں ہے۔ بلکہ والہ ہے۔
بیمار ہوئی ہے۔

تھوڑا سا صبر سے چاہئے۔ کو صبر سے
صاف فرمایا جاوے گا۔ صبر سے چھوڑا ہے۔
میں نوازش ہے۔
کیل بدلے 68 عظیم نام لہجے

POLICE DEPARTMENT

21



DISTRICT MANSEHRA

L-8/ dated /2020

Office of the L/Branch Mansehra No.

To: The Worthy District Police Officer,
Mansehra,

Subject: FORMAL DEPARTMENTAL ENQUIRY REPORT.

Memo:

Respected Sir,

Kindly refer to your office Endst: No. 27-28/SRC dated
03.03.2020.

It is submitted that enquiry under had was entrusted to the undersigned to conduct proper enquiry against accused official namely constable Bilawal No. 68 GD Police Post Chapra Police Station Lissan Nawab.

Allegation:-

Vide Police Lines DD No. 18 dated 21.02.2020, it has been reported that the accused official absented himself from duty without any leave or permission on the following occasions:-

30.01.2020 to 21.02.2020	22 days
21.02.2020 to 26.02.2020	6 days
Total 28 days	

During the enquiry proceedings, the accused official was informed to submit his reply to the charge sheet and record his statement.

On 13.03.2020, Mohair Police station Lissan Nawab vide DD No. 13 dated 13.03.2020 reported that accused official has been absent from duty vide DD No. 24 dated 28.02.2020. On the report of Mohair Police Station Lissan Nawab, Notice was issued to the accused official through SHO police station Gharl Habibullah to effect his personal service which has been accordingly made by

M. A. Ch
ATTESTED
11/3/2021



Simulation Appointment

S. No	Date	Time	Signature
1			
2			
3			

Radiotherapy

Phase 1 54 Gy in 20 Fx to Lt. Temporal Region with single direct port on GMEV's a max with bolus.

27

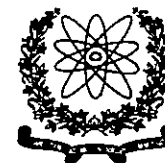
S. No	Date	Dose (cGy)	Signature
1	11/10/10	As prescribed	
2	12/10/10	by Dr.	
3	13/10/10		
4	14/10/10		
5	15/10		
6	16/10/10		
7	17/10		
8	18/10/10		
9	19/10/10		
10	20/10		
11	21/10/10		
12	22/10/10		
13	23/10/10		
14	24/10		
15	25-11-10		
16	26/11/10		
17	27-11-10		
18	28-11-10		
19	29/11/10		
20	30/11/10		
21			
22			

S. No	Date	Dose (cGy)	Signature
23			
24			
25			
26			
27			
28			
29			
30			

Phase 2/Boost

S. No	Date	Dose (cGy)	Signature
1	10.9.14	As Prescribed	
2	11.9.14	by Dr.	
3	12.9.14		
4	13.9.14		
5	14.9.14		
6	15.9.14		
7	16.9.14		
8	17.9.14		
9	18.9.14		
10	19.9.14		
11	20.9.14		
12	21.9.14		
13	22.9.14		
14	23.9.14		
15	24.9.14		
16	25.9.14		
17	26.9.14		
18			
19			
20			

Institute of Nuclear Medicine Oncology and Radiotherapy
(INOR), Abbottabad



کینسر ہسپتال INOR

Director: Dr. Amjad Aziz Khan

DEPARTMENT OF ONCOLOGY

Consultant & Head: Dr. Nadeem Zia Abbasi

Medical Officers: Dr. Furqan Ali
Dr. Khalid Hussain
Dr. Zainab Zahur

Medical Physicists: Mr. Akbar Ali
Miss. Atria Gul
Miss. Nazia Neelam Shehzadi

Technologists: Mr. Nisar Ahmad
Mr. Amir Amanullah
Mr. Muqdamil Khan
Mr. Shahzad Ahmad
Mr. Aftab Masood

Patient Information

Reg. No: RF-715/10 Date: _____
 Patient's Name: Shafiq ur Rehman
 Son, Daughter, Wife of: Latif ur Rehman
 Address: Gani H. S. S. Abbottabad
 Phone No: 0314-5093600

Handwritten notes and signatures on the right side of the page, including 'Attested' and dates.

65/10

23

18

21-06-12

Dr. Shakeel Ahmed

M.B.B.S, F.C.P.S (Med) F.C.P.S 1(Card)

ASSISTANT PROF. (CARDIOLOGY)

Cardiologist & Medical Specialist

Ayub Teaching Hospital, Abbottabad

Clinic: Zia Plaza. Tel:0992-385271

Date

Name: Jamila

Age: 65 Sex: F

Disease: Hypertension

Address: CS

QC: See report below
Q/E: 9th week

BP: 160/110

PULSE

CVS

RESP

GIT

ECG: 5 WP
X-ray CS: 5

For AMBLYOPIC/NEURITIS
5/160

C.O
E.C.G.

TM NEUROBIO

TM OLSIM

NO MEDICATION

U.P. - P.M.P

Shakeel

ATTESTED

11/3/2021



24



ڈاکٹر وقاص احمد

ایم۔ بی۔ بی۔ ایس
جنرل فزیشن

Cell: 0345-4736633 / 0333-2515117

Pt's Name: SHAFIQ UREHMAN Age: Date: 22-05-2013

Clinical Record

Rx

1/c

- Fever \bar{e}
Chill, on/off.
- Musculoskeletal Pain.
- Generalized weakness.
- B.P.: - 190/110
- Pulse: - 82/min.
- Temp: - 99°F.
- S₁ - S₂ - Aortic
- Non tend
- Abd.
- No odd sound.

Adv:

- C.P.
- E.C.G.
- Urine R/E.

- 900 Lasix 1/4 stat.
- 900 Neurobim 1/m.
- Tab Clonitex 20mg. 1-1.
- Cap Nexlumony
(11/22/22) 2/2/2/2
- Tab ASA 50mg 2/2/2/2
- Piroxicam gel
(11/22/22) 2/2/2/2

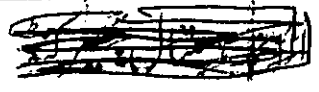
- Syo Trimetabs 1
(11/22/22) 2+2+2
- Tab Felba 20mg
- Tab Calpoff 1-1-1

M. Q. A. Q. N.
ATETSTED

11/3/2021

beautifulvalleys@hotmail.com

ایپر 24 گھنٹے



THE ABBOTTABAD EYE CENTRE

Prof. Dr. Sayed Ashfaq Ali Shah

MBBS, DO, FCPS

Fellow Vitreo-retinal Surg, (Germany)

Professor & Head Department of Ophthalmology
Ayub Medical College, Abbottabad

**Clinic: Qureshi Plaza
Mandian Abbottabad.**

پروفیسر ڈاکٹر سید اشفاق علی شاہ

ایم۔ بی۔ بی۔ ایس۔ این۔ ڈی۔ او۔ ایف۔ سی۔ پی۔ ایس۔

فیو ویترو ریٹینل سرجری (جرمنی)

پروفیسر ایڈ ہیز ڈیپارٹمنٹ آف انفیلمالوجی ایوب میڈیکل کالج ایبٹ آباد

کلینک: قریشی پلازا منڈیاں ایبٹ آباد

Date 28/3/17

Mr. Shafiq u. Rehman

RAYNER
MODEL
POWER
LENGTH
LOT

RAYNER OPTICALS LIMITED
13 BUCKLEBOURNE GATE
BROMLEY, MIDDLESEX, U.K.

970C
+18.00D
12.0mm
056EB420003



707

1170

V_{R12} = 9

*Admit Eye +
wud plan
p @ phaco / ECEL*

[Signature]
F J M D

BL Sclerotic
Cataract

25/04/17

*دیکھو دن کج عوے
کتب*

Moabing of

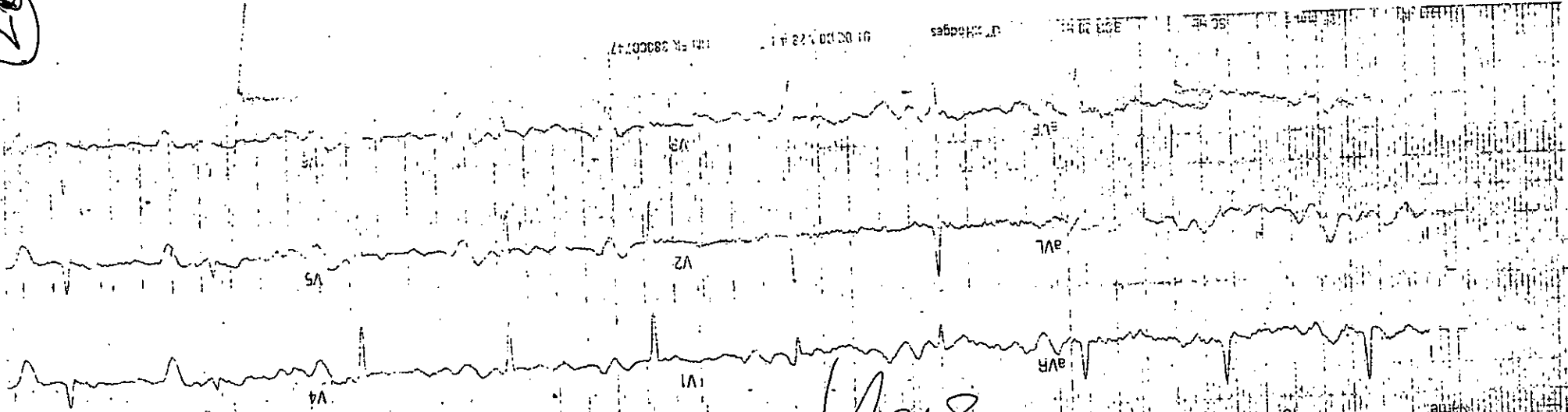
[Signature]

ATETSTED

11/3/2021

*کاربار کا ملکہ سے دو دن پہلے
سردی لگنے
ہراس کے ساتھ*

26



Shayne Johnson

13-12-2018 12:24:53 PM

Radw
ATTESTED
 11/3/2021

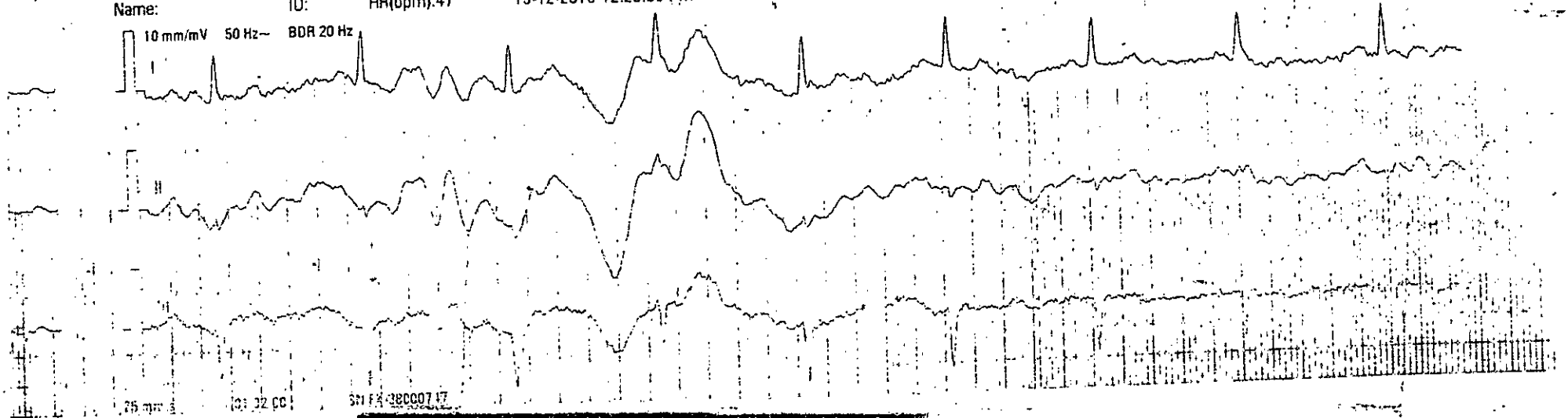
Name:

ID:

HR(bpm):47

13-12-2018 12:25:06 PM

10 mm/mV 50 Hz~ BDR 20 Hz

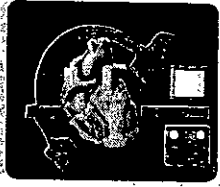


25 mm

32 CC

571 FA 380007 47

27



Dr. ABID ALI KHAN MBBS MD MRCP (London) MRCP (UK)
Preceptorship in Rotational Atherectomy (France)

Abbottabad Heart Centre
Karakoram Highway
Abbottabad

Pakistan www.abbottabadheartcentre.com.pk Tel: 0092 3009113211
Angiography, Angioplasty, Pacemakers, Echocardiography, Stress Tests

Interventional Cardiologist

NATURAL JUSTICE
60y.

Hypertension
Asthma + sinus
04.10.2002

At night EMC good w/ RU
Hypertension decreased

by Mr. NEGIX Sony.
CAB - 9. - 100 L

to the LOWEST 75y.
- 7 - 100 L

[Handwritten signature]
15/11/02

[Handwritten signature]
ATETSTED
11/3/2021

BIBI NAYYAR, SULTANA

طائر حیات کی =

28

DOB:01/01/1950

Study ID: 2000

ABBOTTABAD HEART CENTER

Name: BIBI NAYYAR, SULTANA	Study Date: 11/15/2018 07:43 PM
MRN: 1350199091294	Performed By: DR ABID Ali khan
DOB: 01/01/1950	Age: 68 yrs
Gender: Female	

Cardiac

Dimension

MMode

AoR Diam (MM):	3.55 cm	LA Dimen (MM):	3.61 cm
----------------	---------	----------------	---------

LA/Ao (MM):	1.02
-------------	------

Aortic Valve

Doppler

AV VTI:	25.4 cm
AV Vmax:	105 cm/s
AV Max PG:	4.38 mmHg
AV Vmean:	77.3 cm/s
AV Mean PG:	2.61 mmHg

M. Adr.
ATELSTED
 11/15/2018

Mitral Valve

Doppler

MV Peak E Vel:	78.5 cm/s	MV Peak E Vel:	78.5 cm/s
MV Peak E PG:	2.47 mmHg	MV Peak E PG:	2.47 mmHg

Left Ventricle

The left ventricle is normal in size. There is no thrombus. There is mild concentric left ventricular hypertrophy. Left ventricular systolic function is normal. The transmitral spectral Doppler flow pattern is suggestive of impaired LV relaxation. The left ventricular wall motion is normal.

Right Ventricle

The right ventricle is normal in size and function.

Atria

The left atrial size is normal. Right atrial size is normal. The interatrial septum is intact with no evidence for an atrial septal defect.

Mitral Valve

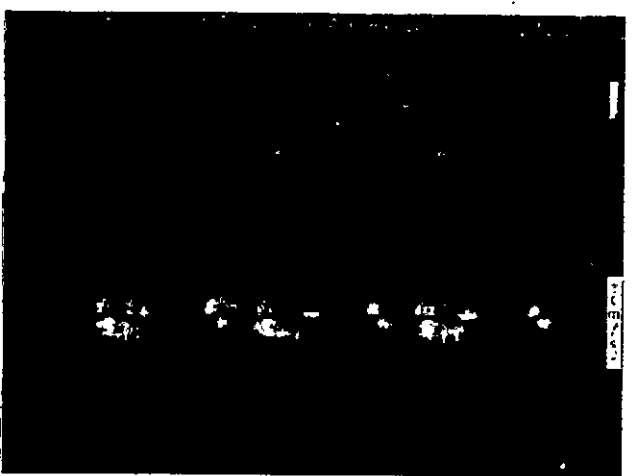
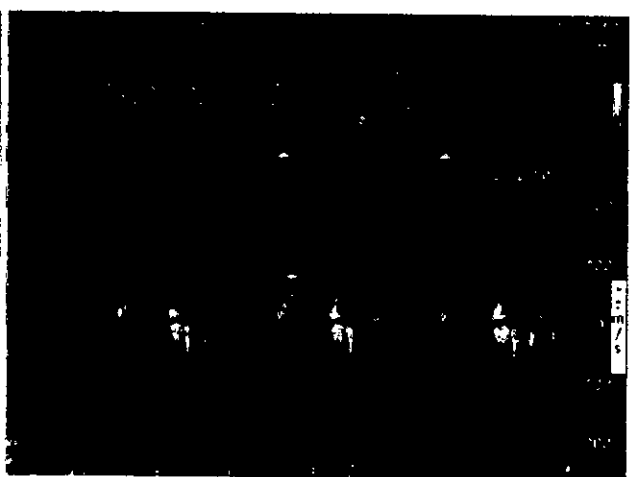
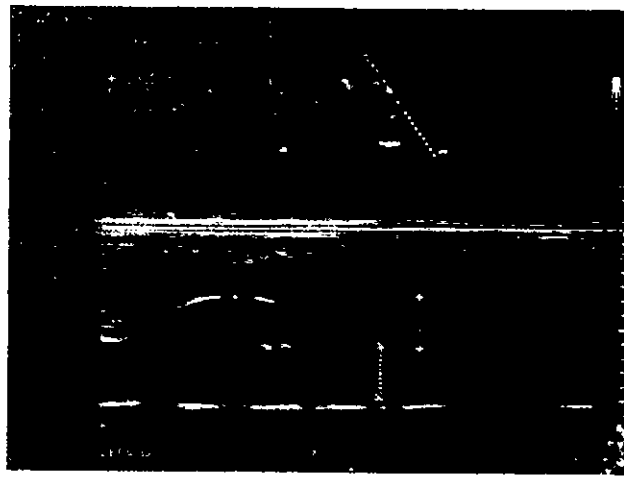
The mitral valve is normal in size, shape and function.

Tricuspid Valve

The tricuspid valve is normal in size, shape and function.

Aortic Valve

The aortic valve is normal in size, shape and function.



Interpretation Summary

Comments

GOOD LV AND RV FUNCTION WITH NO RWMA. MILD AORTIC VALVCE THICKENING . DIASTOLIC IMPAIRMENT LV GRADE 1.

FEATURES OF HYPERTENSION.

DR ABID ALI KHAN.

29

Dr. M. Sohail

ڈاکٹر امجد علی صاحب

Dr. Saira

Gynaecologist

Medical Specialist

16 AUG 2018



160/80

Naya Sultan.

1st 1 month

HIN.

hyperuricemia

Cardiologist's
opinion.

(G, S, ...)

Kidneys

1-1170
Sust 1st

1st 3 months

→ Angina.
on Excretion
uric acid.
CXR.

(G, S, ...)

1st 3 months X

(G, S, ...)

1st 3 months | Low protein
(G, S, ...)

M. A. Khan

ATTESTED

11/3/2021

1st 2 months
(G, S, ...)

9

30



Dr. Altaf Hussain
Cardiologist
Ayub Teaching Hospital Abbottabad.

HTW / HTW
HTW

SYMPTOMATIC

Maan
ATETSTED
1/3/2021

Clinic : Shafiq Medical Centre, Mansehra Road, Abbottabad.

For Appointment Contact : 0314-5021554



31

Handwritten initials

Dr. Altaf Hussain

Cardiologist

Ayub Teaching Hospital Abbottabad.

SINCE 2012

23.11.2021

HTW / INTIME

11/12

SYMPTOMATIC

Handwritten signature
ATTESTED

11/12/2021

Clinic :: Shafiq Medical Centre, Mansehra Road, Abbottabad.

For Appointment: Contact :: 0314-5021554

KING ABDULLAH TEACHING HOSPITAL MANSEHRA

(32) (27)

DISCHARGE SLIP

MEDICAL UNIT

Name SHAFEEQ UR REHMAN FIN LATEEF-UR-REHMAN Age 73 wt. _____

Sex MALE Admission No 273/22 Address GARI HABIBULLAH

D/Admission 28-02-2020 D/Operation _____ D/Discharge 17-03-2020

Disease BRONCHITIS / Dyspepsia Operation / Delivery _____

Operation Findings _____

ADMISSION SUMMARY: FEVER, Cough, CHEST & Throat infection
VOMITING, PAIN IN ABDOMIN

INVESTIGATIONS: ECG, CXR, Blood CP, H. pylori test
RBS

TREATMENT HOSPITAL: ceftroxione 1gm 1x BD INF OMEPRazole 1x OD
ONset 1x BD, INF PROVAS IV, Syd MOTILLIDUM
TAS PANADOL, Syd ULSANIC 2x TDS

TREATMENT FOR HOME: CAD Losec 20mg 1x BD
TAS KLARICID 500MG 1x BD
TAS DESORA 1x OD
TAS NISE 1x BD
Syd PROSPAN 2x BD

DISCHARGE SUMMARY Stable

آب پی پی اور ODD سے دلوائی

ATTESTED
11/3/2021

DOCTOR ON DUTY



KING ABDULLAH TEACHING HOSPITAL

MANSEHRA
A & E Department

(28)

(33)

Patient Name: SHAFEEQ UR REHMAN

Age

Gender:

Invoice No 31028

RTA/ MLC No.:

Weight

Date 28 Feb 2021

Contact Address

Known Allergies:

Time 03:54 PM

Presenting Complaints

Chest pain
Cough
Dyspepsia

Investigations:

CXR

Reason For Referral

Rx

Name of Drug	Dosage	Strength	Frequency	Remarks
	Period	Qty	Route	

Refer to medical ward.

Stamp & Signature of Prescriber

Patient Name:

Home Treatment

B.P.: 140/80

Temp: 100°F

Pulse:

GCS:

Blood CP
CXR

[Signature]

Signature

ATTESTED

11/3/2021

(34) (28)

KING ABDULLAH TEACHING HOSPITAL MANSEHRA

DISCHARGE SLIP

_____ MmW _____ UNIT

Name Shafiq ul Haq F/N Latif ur Rehman Age 73^{1/2} wt. _____

Sex ♂ Admission No 2114/2 Address Geni Tallea

D/Admission 30/1/2021 D/Operation _____ D/Discharge 27/02/2021

Disease Sepsis / Abscess Operation / Delivery _____

Operation Findings _____

ADMISSION SUMMARY: _____

INVESTIGATIONS: _____

TREATMENT HOSPITAL: Blind Intub. ? Pos. ? Culture

? Abscess ? FE ? DIC

M. Raad
ATTESTED

TREATMENT FOR HOME: Tab. Azithromycin 1 to 11/2/2021

Tab. Paracetamol 1 to

DISCHARGE SUMMARY Cap. uninfected

Rev. of 7/2/21 Sep. Trace ORC FU
2001

[Signature]
DOCTOR ON DUTY



KING ABDULLAH TEACHING HOSPITAL

MANSEHRA
A & E Department

red

35

30

Patient Name: SHAFEEQ UR REHMAN

Age

Gender:

Invoice No 18654

RTA/ MLC No.:

Weight

Date 30 Jan 2020

Contact Address

Known Allergies:

Time 03:31 PM

Presenting Complaints

Rx

Name of Drug

Dosage

Strength

Frequency

Remarks

Period

Qty

Route

Few for mlu

Acid mlu

Investigations

Reason For Referral

*OK
Pul-
Jelu Telu
BL
Z*

[Signature]

Stamp & Signature of Prescriber

Patient Name:

Home Treatment

P.:

Temp:

Pulse:

RS:

*(ABC
OR
wink
user)*

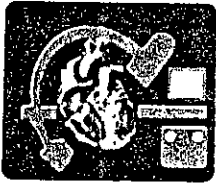
Signature

[Signature]

ATTESTED

11/3/2021

36



Dr ABID ALI KHAN MBBS MD MRCP (London) MRCP (UK)
Preceptorship in Rotational Atherectomy (France)

Abbottabad Heart Centre
Karakoram Highway
Abbottabad

Pakistan www.abbottabadheartcentre.com.pk Tel: 0092 3009113211
Angiography, Angioplasty, Pacemakers, Echocardiography, Stress Tests

Interventional Cardiologist

NATIA JULIANA
60 yrs.

Hypertension
Arterio + peric.
DT. 14/10/2021

DT reports ECHO Good LV/RV
Hypertension decreased.

by Mr. NEBIX Sony.
01.6 - 7. - low Ls

② Mr LOWRIAT 75y.
- 7. - low Ls.

[Signature]
15/11/21

[Signature]

ATETSTED

11/2/2021

YYAR, SULTANA

DOB: 01/01/1950

37 = 6.1.18
— 7 —
BA

Study ID: 2000

ABBOTTABAD HEART CENTER

Name: BIBI NAYYAR, SULTANA
MRN: T350199091294
DOB: 01/01/1950
Gender: Female

Study Date: 11/15/2018 07:43 PM
Performed By: DR ABID Ali khan
Age: 68 yrs

Cardiac

Dimension

MMode

AoR Diam (MM): 3.55 cm LA Dimen (MM): 3.61 cm

LA/Ao (MM): 1.02

Aortic Valve

Doppler

AV VTI: 25.4 cm
AV Vmax: 105 cm/s
AV Max PG: 4.38 mmHg
AV Vmean: 77.3 cm/s
AV Mean PG: 2.61 mmHg

Mitral Valve

Doppler

MV Peak E Vel: 78.5 cm/s MV Peak E Vel: 78.5 cm/s
MV Peak E PG: 2.47 mmHg MV Peak E PG: 2.47 mmHg

Abid
ATETSTED

11/15/2018

Left Ventricle

The left ventricle is normal in size. There is no thrombus. There is mild concentric left ventricular hypertrophy. Left ventricular systolic function is normal. The transmitral spectral Doppler flow pattern is suggestive of impaired LV relaxation. The left ventricular wall motion is normal.

Right Ventricle

The right ventricle is normal in size and function.

Atria

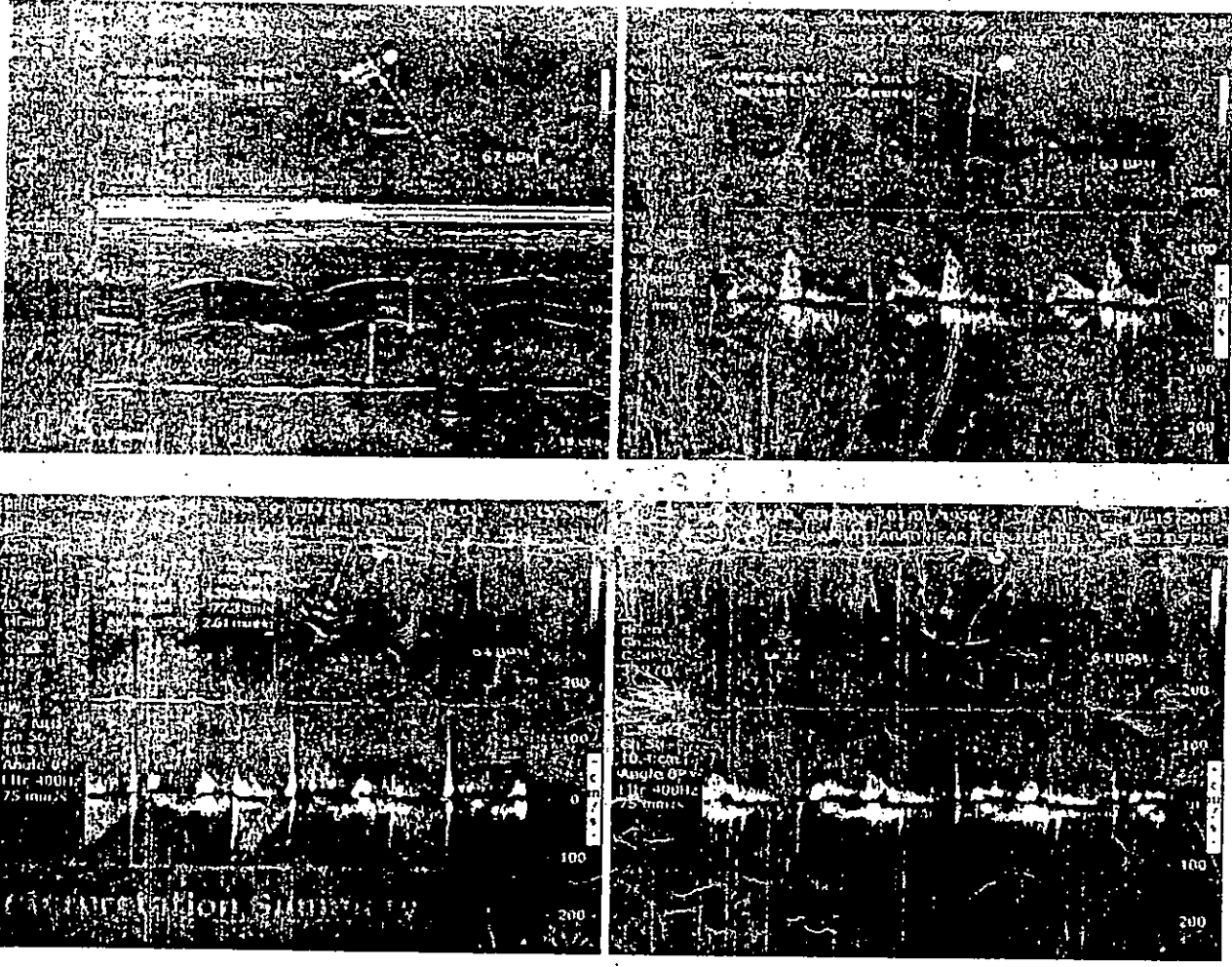
The left atrial size is normal. Right atrial size is normal. The interatrial septum is intact with no evidence for an atrial septal defect.

06/15/18

Mitral Regurgitation
The mitral regurgitation is mild to moderate.

Tricuspid Regurgitation
The tricuspid regurgitation is mild to moderate.

Aortic Regurgitation
The aortic regurgitation is mild to moderate.



Interpretation Summary

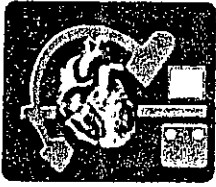
Comments

GOOD LV AND RV FUNCTION WITH NO RWMA. MILD AORTIC VALVE THICKENING DIASTOLIC IMPAIRMENT LV GRADE 1.

FEATURES OF HYPERTENSION

DR ABID ALI KHAN.

38



Interventional Cardiologist

Dr ABID ALI KHAN MBBS MD MRCP (London) MRCP (UK)
Preceptorship in Rotational Atherectomy (France)

Abbottabad Heart Centre
Karakoram Highway
Abbottabad
Pakistan www.abbottabadheartcentre.com.pk Tel: 0092 3009113211
Angiography, Angioplasty, Pacemakers, Echocardiography, Stress Tests

NIRYAL SULTANA
60y.

Hypertension
Atrial fibrillation
DB: 140/90mmHg

At. regants ECHO good w/RV
Hypertensive disease

by the NCCIX Surg.
C.C.B - 7 - Saw Ls

① the LOWPLAT 15y.
- 7 - Saw Ls

[Signature]
15/11/10

[Signature]
ATTESTED

11/3/2021

Member, Tutor and Clinical Supervisor to the JCHMETB and Royal Colleges of Physicians of London Edinburgh and Glasgow

Director: Cannon Park Healthcare, Registered in England
Provider of Interventional cardiology services to the National Health Service, UK

For Appointment 0315-5900461

39

YYAR, SULTANA

= 6/1/12
- 7 -

DOB: 01/01/1950

Study ID: 2000

ABBOTTABAD HEART CENTER

Name: BIBI NAYYAR, SULTANA	Study Date: 11/15/2018 07:43 PM
MRN: 1350199091294	Performed By: DR ABID Ali khan
DOB: 01/01/1950	Age: 68 yrs
Gender: Female	

Cardiac

Dimension

MMode

AoR Diam (MM):	3.55 cm	LA Dimen (MM):	3.61 cm
----------------	---------	----------------	---------

LA/Ao (MM):	1.02
-------------	------

Aortic Valve

Doppler

AV VTI:	25.4 cm
AV Vmax:	105 cm/s
AV Max PG:	4.38 mmHg
AV Vmean:	77.3 cm/s
AV Mean PG:	2.61 mmHg

Mitral Valve

Doppler

MV Peak E Vel:	78.5 cm/s	MV Peak E Vel:	78.5 cm/s
MV Peak E PG:	2.47 mmHg	MV Peak E PG:	2.47 mmHg

Left Ventricle

The left ventricle is normal in size. There is no thrombus. There is mild concentric left ventricular hypertrophy. Left ventricular systolic function is normal. The transmitral spectral Doppler flow pattern is suggestive of impaired LV relaxation. The left ventricular wall motion is normal.

Right Ventricle

The right ventricle is normal in size and function.

Atria

The left atrial size is normal. Right atrial size is normal. The interatrial septum is flat with no evidence for an atrial septal defect.

Dr. Asif
ATETSTED

11/15/2018

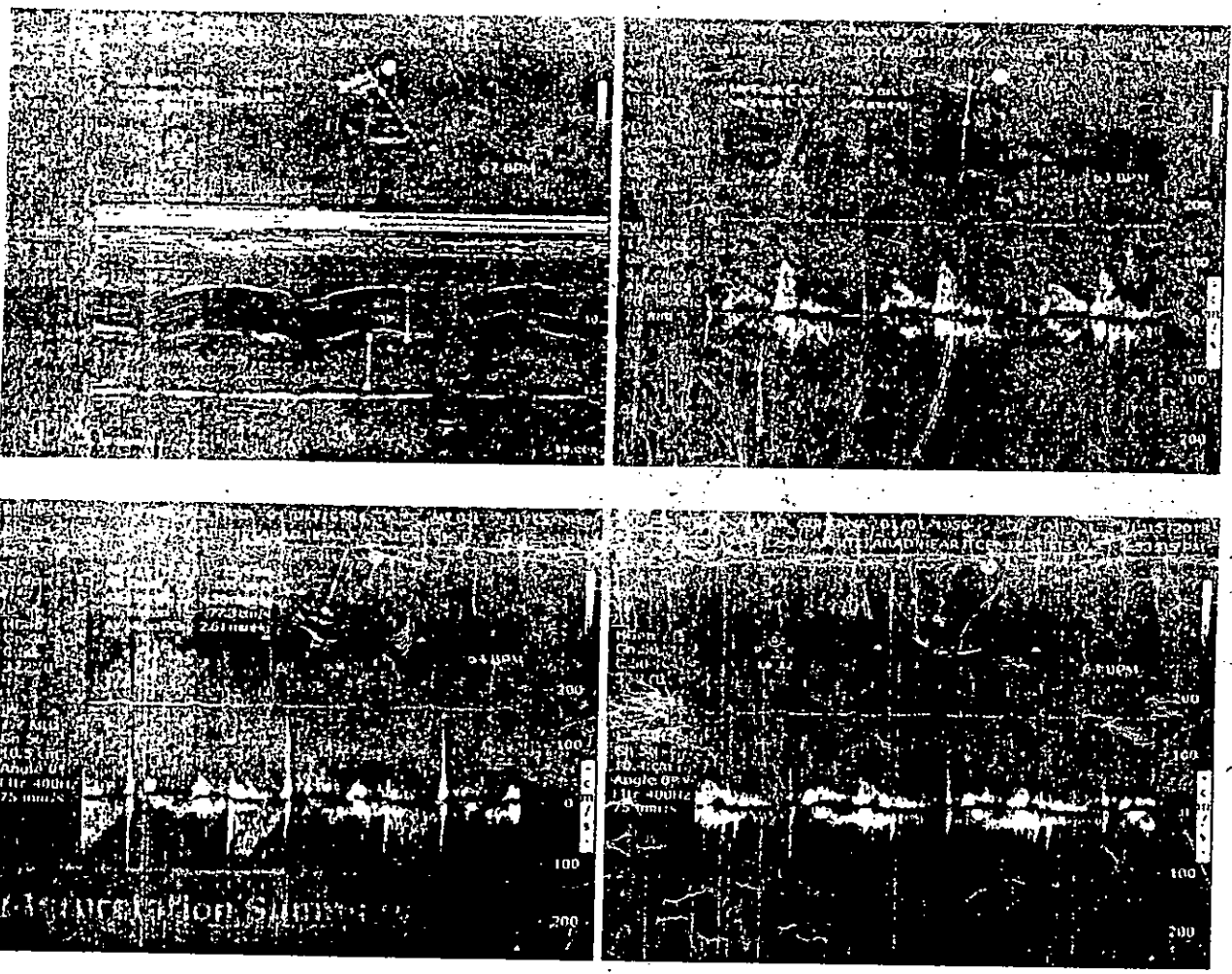
06/15/15

07/20/15 11:20

Mitral Regurgitation
The mitral regurgitation is mild to moderate.

Tricuspid Regurgitation
The tricuspid regurgitation is mild to moderate.

Aortic Regurgitation
The aortic regurgitation is mild to moderate.



Interpretation Summary




Comments

GOOD LV AND RV FUNCTION WITH NO RWMA. MILD AORTIC VALVCE THICKENING DIASTOLIC IMPAIRMENT LV GRADE 1.

FEATURES OF HYPERTENSION

DR ABID ALI KHAN.

40

قیمت 50 روپے	73373	  
ایڈوکیٹ: محمد صدیق ادریس کھٹک		پشاور بار ایسوسی ایشن، خیبر پختونخواہ
بار کونسل ایسوسی ایشن نمبر: 657-91		
رابطہ نمبر: 0332-4353224		

بعدالت جناب: جس میں سردس سرٹیفکیٹ کے لیے KPK لٹا ہے

مخاطب: اہلانت	دعویٰ: سردس اپیل
 حاکم عدالت KPK پشاور	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ

آن مقام کٹھن صاحب کے لیے محمد صدیق ادریس کھٹک کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو اضی نامہ کرہ منے و تقریر ثالث و فیصلہ بر حلف دینے جو اب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو چیز چاہے ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

طلوعل خان

المرقوم: 01/02/2021

Accepted
 & attested
 لٹا ہے
 مقام

نوٹ: اس وکالت نامہ کی فونو کاپی ناقابل قبول ہوگی۔

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR.

SERVICE APPEL NO 3817/2021.

Bilawal no. 68 EX FC s/o shafiqurehamn: r/o Ghari Habibullah Row
Tehsil and district Mansehra.

.....Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa Peshawar through secretary Home and tribal Affairs department.
2. Provincial Police Officer Khyber Pakhtunkhwa Peshawar.
3. Deputy Inspector General of Police, Hazara Region Abbottabad.
4. District Police Officer, Mansehra.

..... Respondents

INDEX

S #	Description of Documents	Annexure	Page #
1	Comments / Reply		1-4
2	Affidavit		5-
3	Annexure		6-13


Deponent

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR.

SERVICE APPEL NO 3817/2021.

Bilawal No. 68 EX FC s/o shafiqrehamn r/o Ghari Habibullah Row
Tehsil and district Mansehra.

.....Appellant

VERSUS

- 1) Government of Khyber Pakhtunkhwa Peshawar through Secretary Home and Tribal Affairs department.
- 2) Provincial Police Officer Khyber Pakhtunkhwa Peshawar.
- 3) Deputy Inspector General of Police, Hazara Region Abbottabad.
- 4) District Police Officer, Mansehra.

..... Respondents

Reply/Comments On Behalf Of Respondents

RESPECTFULLY SHEWETH:-

PRELIMINARY OBJECTION:-

- a) The appeal is not based on facts and appellant has got no cause of action and locus standi.
- b) That appeal is not maintainable in the present form.
- c) The appeal is bad for non- joinder and mis-joinder of necessary parties.
- d) The appellant is estopped by his own conduct to file the appeal.
- e) The appeal is barred by the law and limitation.
- f) The appellant did not come to the Honorable Tribunal with clean hands.

FACTS:-

- 1. Correct to the extent that the appellant was employ of police but his performance was not upto mark. Previous punishment/bad entries is annexure "A".
- 2. As explain above.

3. In reply it was submitted that the appellant while posted at police lines Mansehra has absented himself from duty without any leave or permission on the following occasions:-

From	To	Total days
30.01.2020	26.02.2020	28 days
21.02.2020	17.03.2020	18 days
Total (46 days)		

4. The appellant was properly charge sheeted (**Annexure B**) and after proper enquiry (**Annexure C**), he was held guilty and competent authority awarded punishment of dismissal from service (**Annexure D**). His departmental appeal was also rejected (**Annexure E**). The appellant filed revision petition before the respondent No. 02 which was filed on the ground that appellant is habitual absentee and dismissed twice during his career (**Annexure F**).
5. Incorrect. His previous punishment record is as under:-

Previous Punishment Record		
OB No. & dated	Reason	Punishment
OB No. 54 dated 19.03.2013	03 days absented himself from duty.	Censure
OB No. 156 dated 27.08.2014	17 days absented himself from duty.	Fine Rs. 1000/-
OB NO. 114 dated 03.06.2009	Absented himself from duty	Stoppage of one year increment with cumulative effect
OB No. 09 dated 07.01.2016	Absented himself from duty	Stoppage of one year increment with cumulative effect
OB No. 170 dated 03.02.2016	54 days absented himself from duty	Stoppage of one year increment without cumulative effect
OB No. 170 dated 18.10.2016	69 days absented himself from duty	Dismissed from service
OB No. 179 dated 12.10.2017	82 days absented himself from duty	Dismissed from service
OB No. 94 dated 23.05.2018	absented himself from duty	Reduction in pay by 02 stages for two years

Moreover, detail reply is given in Para 3 & 4 ibid.

- 6. Incorrect. The appellant did not submit any application for leave.
- 7. Incorrect. The appellant is habitual absentee and several times awarded different punishments on account of absence from duty.
- 8. Incorrect. A proper enquiry was conducted and he was afforded all opportunities of defense to prove his innocence.
- 9. Incorrect. As explain above charge sheet was issued enquiry was conducted. Detail reply is given in Para No. 4 ibid.
- 10. Incorrect. The appellant has willfully absented from duty without leave and caused loss to his financial status.
- 11. All the codal formalities were fulfilled before passing the order of dismissal.
- 12. The instant appeal is not maintainable on the following grounds:-

GROUND:-

- A. Incorrect. The impugned order is just, legal and in accordance with law.
- B. Incorrect. The appellant was given the proper opportunity of personal hearing but he could not convince the competent authority.
- C. Incorrect. His service record is worth perusal and previously dismissed from service several times.
- D. Incorrect. A proper departmental enquiry was conducted against him and full opportunity was granted to join the proceedings.
- E. Incorrect. already explained above.
- F. Incorrect. The appellant is habitual absentee.
- G. Incorrect. The appellant is not entitled to be reinstated in service. Detail reply is given in Paras ibid.
- H. Incorrect. The appeal in hand is badly time barred.
- I. The respondents seek permission to raise additional grounds during the arguments.

PRAYER:-

In view of the above mentioned facts, the appeal in hand may kindly be dismissed being devoid of any legal force and badly time barred case.

**District Police Officer
Mansehra
(Respondent No. 3)**

**Regional Police Officer
Hazara Region Abbottabad
(Respondent No. 4)**

**Provincial Police Officer
Khyber Pakhtunkhwa Peshawar
(Respondent No. 2)**

[Faint, illegible text]

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR.

SERVICE APPEL NO 3817/2021.

Bilawal no. 68 EX FC s/o shafiqurehamn r/o Ghari Habibullah Row Tehsil and district Mansehra.

.....Appellant

VERSUS

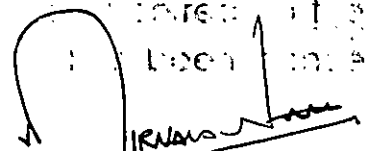
- 1. Provincial Police Officer Khyber Pakhtunkhwa Peshawar.
- 2. Deputy Inspector General of Police, Hazara Region Abbottabad.
- 3. District Police Officer, Mansehra.

..... Respondents

AFFIDAVIT

We respondents, do hereby solemnly affirm and declare that the contents of comments are true and correct to the best of our knowledge and belief and nothing has been concealed or suppressed from this Honorable Tribunal.


District Police Officer
Mansehra
(Respondent No. 3)


Regional Police Officer
Hazara Region Abbottabad
(Respondent No. 4)


Provincial Police Officer
Khyber Pakhtunkhwa Peshawar
(Respondent No. 2)

Previous Punishment Record		
OB No. & dated	Reason	Punishment
OB No. 54 dated 19.03.2013	03 days absented himself from duty	Censure
OB No. 156 dated 27.08.2014	17 days absented himself from duty	Fine Rs. 1000/-
OB NO. 114 dated 03.06.2009	Absented himself from duty	Stoppage of one year increment with cumulative effect
OB No. 09 dated 07.01.2016	Absented himself from duty	Stoppage of one year increment with cumulative effect
OB No. 170 dated 03.02.2016	54 days absented himself from duty	Stoppage of one year increment without cumulative effect
OB No. 170 dated 18.10.2016	69 days absented himself from duty	Dismissed from service
OB No. 179 dated 12.10.2017	82 days absented himself from duty	Dismissed from service
OB No. 94 dated 23.05.2018	absented himself from duty	Reduction in pay by 02 stages, for two years

7

Annex-B

CHARGE SHEET

I, Sadiq Hussain Baloch (PSP), District Police Officer, Mansehra as Competent Authority, hereby charge you Constable Bilawal No. 68 GD PPP Chapra PS Lissan Nawab as follows.

Vide DD No. 18 dated 21-02-2020 Police Lines Mansehra it has been reported that you have absented yourself from duty with effect from 30-01-2020 to 21-02-2020 (22 days) without any leave or permission. You again absented yourself from duty with effect from 21-02-2020 to 26-02-2020 (06) days. Your previous punishment record has been checked which show that your are an habitual absentee and following Major/Minor punishment were awarded to you on your willful absence but you did not change your habit so far. It amounts to gross misconduct on your part.

PUNISHMENT RECORD

OB No. 30 dated 08-03-2010	Censure
OB No. 54 dated 19-03-2013	03 days without pay
OB No. 165 dated 27-08-2014	Fine Rs. 1000 and leave without pay
OB No. 95 dated 06-05-2009	One day Extra Drill
OB No. 114 dated 03-06-2009	Stoppage of 01 year increment with cumulative effect
OB No. 205 dated 19-11-2014	18 days leave without pay
OB No. 9 dated 07-01-2016	Stoppage of 01 year increment with cumulative effect
OB No. 27 dated 03-02-2016	Stoppage of 01 year increment without cumulative effect
OB No. 170 dated 18-10-2016	Dismissed from Service and absence period is treated as leave without pay. Reinstated in service vide RPO, Hazara Region Abbottabad Endst: No. 1925/PA dated 21-04-2017. Period of absence treated as leave without pay.
OB No. 179 dated 12-10-2017	Dismissed from service. Reinstated in service and punishment converted in to reduction in pay by two stages for two years vide CPO, Peshawar Memo: No. 1947/18 dated 15-05-2018.

Due to reasons stated above you appear to be guilty of misconduct under Khyber Pakhtunkhawa Police Disciplinary Rules 1975 (amended in 2014) and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary Rules.

You are, therefore, required to submit your written defense within 07 days of the receipt of this charge sheet to the enquiry officer.

Your written defense, 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.

Intimate whether you desire to be heard in person or otherwise.

Statement of allegation is also enclosed.


District Police Officer,
Mansehra

DISCIPLINARY ACTION

I, Sadiq Hussain Baloch (PSP), District Police Officer Mansehra, as Competent Authority of the opinion that **Constable Bilawal No. 68 GD PPP Chapra PS Lassar Nawab** has rendered himself liable to be proceeded against as he committed the following act/omissions within the meaning of Khyber Pakhtunkhwa Police Disciplinary Rules 1975 (amended in 2014).

Vide DD No. 18 dated 21-02-2020 Police Lines Mansehra it has been reported that you have absented yourself from duty with effect from 30-01-2020 to 21-02-2020 (22 days) without any leave or permission. You again absented yourself from duty with effect from 21-02-2020 to 26-02-2020 (06) days. Your previous punishment record has been checked which show that your are an habitual absentee and following Major/Minor punishment were awarded to you on your willful absence but you did not change your habit so far. It amounts to gross misconduct on your part.

PUNISHMENT RECORD	
OB No. 30 dated 08-03-2010	Censure
OB No. 54 dated 19-03-2013	03 days without pay
OB No. 165 dated 27-08-2014	Fine Rs. 1000 and leave without pay
OB No. 95 dated 06-05-2009	One day Extra Drill
OB No. 114 dated 03-06-2009	Stoppage of 01 year increment with cumulative effect
OB No. 205 dated 19-11-2014	18 days leave without pay
OB No. 9 dated 07-01-2016	Stoppage of 01 year increment with cumulative effect
OB No. 27 dated 03-02-2016	Stoppage of 01 year increment without cumulative effect
OB No. 170 dated 18-10-2016	Dismissed from Service and absence period is treated as leave without pay. Reinstated in service vide RPO, Hazara Region Abbottabad Enst: No. 1925/PA dated 21-04-2017. Period of absence treated as leave without pay.
OB No. 179 dated 12-10-2017	Dismissed from service. Reinstated in service and punishment converted in to reduction in pay by two stages for two years vide CPO, Peshawar Memo: No. 1947/18 dated 15-05-2018.

For the purpose of scrutinizing the conduct of the said accused Officer with reference to the above allegations Inspector Legal is deputed to conduct formal departmental enquiry against **Constable Bilawal No. 68 GD PPP Chapra PS Lassar Nawab**.

The Enquiry Officer shall in accordance with the provisions of the Khyber Pakhtunkhwa Police Disciplinary Rules 1975 (amended in 2014), provide reasonable opportunity of hearing the accused, record findings and make recommendations as to punishment or other appropriate action against the accused.

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

No 27-28 /SRC dated Mansehra file 03-03-2020

District Police Officer,
Mansehra

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

1. The Enquiry Officer for initiating proceedings against the defaulter officer under the provisions of the Khyber Pakhtunkhwa Police Disciplinary Rules 1975.
2. **Constable Bilawal No. 68 GD PPP Chapra PS Lassar Nawab** with the direction to submit his written statement to the Enquiry Officer within 07 days of the receipt of this charge sheet/statement of allegations and also to appear before the Enquiry Officer on the date, time and place fixed for the purposes of departmental proceedings.

District Police Officer,
Mansehra

9

Annex-C



POLICE DEPARTMENT

DISTRICT MANSEHRA

Office of the L/Branch Mansehra No. L-B/ , dated /2020

To: The Worthy District Police Officer,
Mansehra.

Subject: FORMAL DEPARTMENTAL ENQUIRY REPORT.

Memo:

Respected Sir,

Kindly refer to your office Endst: No. 27-28/SRC dated 03.03.2020.

It is submitted that enquiry under had was entrusted to the undersigned to conduct proper enquiry against accused official namely constable Bitawal No. 68 GD Police Post Chapra Police Station Lissan Nawab.

Allegation:-

Vide Police Lines DD No. 18 dated 21.02.2020, it has been reported that the accused official absented himself from duty without any leave or permission on the following occasions:-

30.01.2020 to 21.02.2020	22 days
21.02.2020 to 26.02.2020	6 days
Total 28 days	

During the enquiry proceedings, the accused official was informed to submit his reply to the charge sheet and record his statement.

On 13.03.2020, Moharir Police station Lissan Nawab vide DD No. 13 dated 13.03.2020 reported that accused official has been absent from duty vide DD No. 24 dated 28.02.2020. On the report of Moharir Police Station Lissan Nawab, Notice was issued to the accused official through SHO police station Ghari Habibullah to effect his personal service which has been accordingly made by

SHO Police Station Ghari Habibullah. The accused official appeared before the undersigned and submitted his reply to the charge sheet stating therein that his father was sick due to which he remained absent from duty. He further stated that his reply may be considered as his statement and prayed for forgiveness.

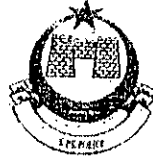
Moharrir Police Lines in his statement stated that accused official remained absent from duty on the aforementioned dates and thereby verified the contents of charge sheet.

Findings:-

In view of the above facts, the accused official was bound to obtain proper leave from the high ups being member of disciplined force but he failed to follow the rules and remained absent for aforementioned period for which he is found guilty. It is worth mentioning that he remained dismissed from service twice in his carrier besides other punishments on the same charge of absence from duty. Keeping in view the period of absence which is 28 days and his previous service record, he is recommended for minor punishment.


18/3/20
Inspector Legal
Mansehra

Ref

POLICE DEPARTMENTMANSEHRA DISTRICTORDERS

This office order will dispose off the departmental enquiry proceeding against Constable Bilawal No. 68 who was proceeded against departmentally with the allegation that while he was posted as GD Police Lines has absented himself from duty with effect from 30-01-2020 to 26-02-2020 (28 days) without any leave or permission vide DD No. 18 dated 21-02-2020 and also absented himself from duty with effect from 28-02-2020 to 17-03-2020 (18 days) while he was posted as GD Police Station Lissan Nawab without any leave or permission vide DD No. 14 dated 17-03-2020:-

The Enquiry Officer i.e. Mr. Akhlaq Hussain Shah Inspector Legal Mansehra after conducting proper departmental enquiry has submitted his report stating therein that, I being enquiry officer came to the conclusion that being member of disciplined force he was supposed to obtain proper leave or permission from his seniors, hence he is recommended for some Suitable Punishment punishment.

A final show cause notice was also issued to the delinquent Constable but his reply was found unsatisfactory. On 23.04.2020 the delinquent Constable Bilawal No. 68 was heard in person but he could not convince the undersigned in his defense.

I, the District Police Officer, Mansehra, therefore award major punishment of "dismissal from service" to the delinquent Constable Bilawal No. 68 under Khyber Pakhtunkhawa Police, Disciplinary Rules 1975 (amended in 2014). The period he spent without permission and leaves is treated as the period without duty so it does not attract any salary and other allowances.

Ordered announced.

OB
24-04-2020


District Police Officer
Mansehra

Annex - E (12)



OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.rpohazara@gmail.com

0345-9560687

NO: 14488 /PA DATED 22/06/2020

ORDER

This order will dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex. Constable Bilawal No. 68 of District Mansehra against the punishment order i.e. *Dismissed from Service* awarded by DPO Mansehra vide OB No.97 dated 24.04.2020.

Brief facts leading to the punishment are that the appellant while posted at Police Lines, Mansehra absented himself from duty without any leave or permission on the following occasions.

DD. No. & date	From	To	Absence
DD No. 18 dated 21-02-2020 Police Lines Mansehra	30-01-2020	26-02-2020	28 days
DD No. 14 dated 17-03-2020 Police Lines Mansehra	28-02-2020	17-03-2020	18 days
Total = 46 days			

The appellant was issued charge sheet alongwith summary of allegations and Inspector Legal was deputed to conduct departmental enquiry. The EO held the appellant responsible of misconduct. The appellant was issued Final Show Cause Notice and heard in person, however he failed to advance any cogent reason in his defence. Consequently, DPO Mansehra awarded him major punishment of dismissal from service.

After receiving his appeal, comments of DPO Mansehra were sought and examined/perused. The undersigned called the appellant in OR and heard him in person. However he failed to advance any plausible justification in his defence. Moreover it is pertinent to mention here that the appellant has been dismissed 3rd time in his service, which shows his disinterest in Government service. Therefore in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkhwa Police Rules, 1975 the appeal is hereby filed with immediate effect.

F.S.R.L / O.H.V
for MIA
DPO Mansehra
25/6

[Signature]
Qazi Jamil ur Rehman (PSP)
REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

No. 14489 /PA, dated Abbottabad the 22-06 /2020.
CC.

- The District Police Officer, Mansehra for information and necessary action with reference to his office Memo No.8792/GB dated 28-05-2020. Service Roll and Fuji Missal containing enquiry file of the appellant is returned herewith for record.



(13)

Amessa F

**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.**

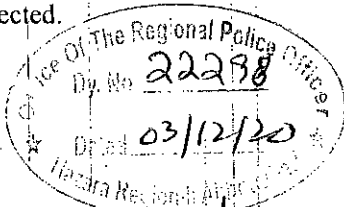
No. S/ 45310 /20, dated Peshawar the 16/11 /2020.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by **Ex-FC Bilawal No. 68**. The petitioner was dismissed from service by District Police Officer, Mansehra vide OB No. 97, dated 24.04.2020 on the allegations of absence from duty w.e.from 30.01.2020 to 26.02.2020 (28 days) and again w.e.from 28.02.2020 to 17.03.2020 (18 days) for a total period 46 days. His appeal was filed by Regional Police Officer, Hazara vide order Endst: No. 14489/PA, dated 22.06.2020.

Meeting of Appellate Board was held on 03.11.2020 wherein petitioner was heard in person. Petitioner contended that his absence was not deliberate but his father was suffering from cancer disease.

Perusal of the record reveals that the petitioner was earlier twice dismissed from service vide order bearing OB No. 170, dated 18.10.2016 and OB No. 179, dated 12.10.2017 on the same allegations which establishes that he is habitual absentee and there is no prospects of mending his ways. The Board see no ground and reasons for acceptance of his petition, therefore, the Board decided that his petition is hereby rejected.



No. S/ 4532-40 /20,

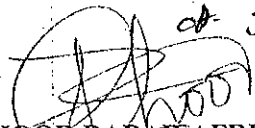
Sd/-

DR. ISHTIAQ AHMED, PSP/PPM
Additional Inspector General of Police,
HQs: Khyber Pakhtunkhwa, Peshawar.

Copy of the above is forwarded to the:

1. Regional Police Officer, Hazara at Abbottabad.
2. District Police Officer, Mansehra. One Service Roll alongwith one Fauji Missal/enquiry file of the above named Ex-FC received vide your office Memo: No. 15230/GB, dated 19.08.2020 is returned herewith for your office record.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
5. PA to Addl. IGP/HQs: Khyber Pakhtunkhwa, Peshawar.
6. PA to DIG/HQs: Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

No. 31795/PA
dt 3-12-20


(ZAHOOR BABAR AFRIDI) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

PA
FW m/s
SRK/DHC
FOO n/a
DPO, Mansehra
Mans
3/12/20

LPO Mansehra
Pas n/a
Jaff
PAK 03/12

بیدالت جناب سروس ٹریبونل چیئرمین صاحب KPK لیٹاؤر

بلاول بنام گورنمنٹ آف KPK

درخواست برآمد تبدیل کرنے تاریخ پیشی در عدالت حضور

جناب عالی

سائل حسب ذیل عرض و مسائل ہے

۱۔ میرا سائل کے مقدمہ ریزع عنوانی بالا میں 20 مارچ 2021ء کو رقم 14/9

عدالت حضور اتریم تجویز ہے

۲۔ میرا سائل کیس بوجہ ذاتی حضور و قنیت عدالت حضور میں پیش

ہونے سے تاخیر ہے

۳۔ میرا سائل کیس بوجہ بین الصوبائی کہ انیسوارٹ کی بندش

کی وجہ سے حاضر ہونے سے تاخیر ہے

14/9
2021

لکھنا اسٹریٹ نمبر 11 دہلی سائل و مسائل کی طرف

14-9-2021 کو عدالت حضور میں پیش ہونے کی

تہا اردنی کا حکم صادر فرمایا جس اور تا تاریخ
تبدیل کرنے کا حکم صادر فرمایا
السرور

دہلی سائل بڈا لہر محمد عدالت کی طرف