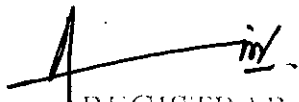


# FORM OF ORDER SHEET

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

**Appeal No.** 1273/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/06/2023	<p>The appeal of Mr. Ahmad Nawaz resubmitted today by Syed Roman Shah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <b>09-06-2023</b>.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Ahmad Nawaz Khan son of Noor Nawaz Khan r/o Shanawa Gujri Khel Karak received today i.e on 02.06.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

Paper used in printing of grounds of appeal is low standard which is not acceptable.

No. 1575 /S.T.

Dt. 5/06 /2023.




REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Syed Roman Shah Adv.  
High Court Peshawar.

Note:

The objection mentioned above is removed with the grounds of appeal printed on standard papers, hence resubmitted for further necessary action.

  
Syed Roman Shah  
Advocate  
06/06/2023

BEFORE THE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA PESHAWAR

Service Appeal No. 1273 /2023

Ahmad Nawaz..... Appellant

Versus

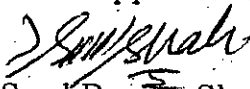
Government of Khyber Pakhtunkhwa and others ..... Respondents

INDEX

S.No.	Description of Documents	Annex	Pages
1.	Memo of appeal with affidavit		1-5
2.	Address of the parties		6
3.	Copy of Charge Sheet and <i>Disciplinary Action</i>	A	7-8
4.	Copy of SCN	B	9
5.	Copy of Impugned order dated 30/01/2023	C	10
6.	Copy of Departmental Appeal	D	11-12
7.	Copy of impugned order dated 18/05/2023	E	13
8.	Copy of other documents		14-25
9.	Wakalat Nama		26

  
Appellant

Through

  
Syed Roman Shah  
Advocate high Court  
Mob No. 0333-9918830

Dated: 01/06/2023

1

BEFORE THE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWAPESHAWAR

Service Appeal No. 1273 /2023

Ahmad Nawaz Khan S/o Noor Nwz Khan R/o Shnawa Gudi Khel, Tehsil Takht  
e Nasrati District Karak. .... Appellant

Versus

1. Government of Khyber Pakhtunkhwa, through Chief secretary, Peshawar
2. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
3. Regional Police Officer Kohat region Khyber Pakhtunkhwa
4. District Police officer Hangu, Khyber Pakhtunkhwa,  
..... Respondents

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974  
AGAINST THE ORDER DATED 30/01/2023 PASSED BY RESPONDENT  
NO. 4 BY WHICH THE APPELLANT HAS BEEN AWARDED MAJOR  
PENALTY OF DISMISSAL FROM SERVICE, AND AGAINST THE ORDER  
DATED 18/05/2023 PASSED BY RESPONDENT NO. 3 VIDE WHICH  
THE DEPARTMENTAL REPRESENTATION/ APPEAL FILED BY  
APPELLANT HAS BEEN PARTIALLY ACCEPTED AND THE PUNISHMENT  
WAS MODIFIED TO THE COMPULSULSRY RETIREMENT FROM  
DISMISSAL.

PRAAYER

On accepting this service appeal, the impugned orders dated  
30/01/2023 and order Dated 18/05/2023 may graciously be set  
aside by declaring it illegal, unlawful, without authority, based on  
mala fide, void abinatio and thus not sustainable in the eyes of law  
and appellant is entitled for reinstatement in service with all back  
benefits of pay and service

Respectfully Sheweth;

1. That, appellant was recruited in Police department in the year 2008, and  
was performing his duty up to the mark to the entire satisfaction of the

superiors.

2. Respondent No. 4 initiated disciplinary proceeding against appellant and issued charge sheet and statement of allegation at the back of appellant.  
(Copy of charge sheet and statement of allegation is attached as Annexure "A")
3. That thereafter Final show cause notice was also issued at the back of appellant.  
(Copy of Final Show Cause attached as Annexure "B")
4. That respondent No. 4 passed an order Dated 30/01/2023 vide which the major punishment of dismissal from service has been passed against appellant without collecting any evidence. (Copy of impugned order Dated 30/01/2023 is attached as Annexure "C")
5. That earlier respondent No.3 vide Letter Dated 13/05/2022 requested the Medical superintendent KDA, Headquarter hospital Kohat for arrangement of Standard medical board for examination of the appellant, but instead of arranging SMB and waiting for the opinion of standard medical board, respondents initiated departmental proceedings against the appellant. It is pertinent to mention here that appellant was busy in his treatment and in light thereof his absence period was neither willful nor intentional as the appellant present himself for duty between the intervals of treatment.
6. That appellant filed departmental appeal /representation (The facts and ground agitated therein may please be treated part and parcel of this appeal) against the impugned order before respondent No. 3, who vide order Dated 18/05/2023 partially accepted the appeal and the punishment was modified to the major punishment of compulsory retirement from the dismissal of service. (Copy of appeal and impugned order are attached as Annexure "D" and "E")
7. That now appellant feeling aggrieved from the above orders, filling this appeal on the following amongst other grounds inter alia

GROUND:

- a. That both the impugned orders of the respondents No.3 and 4, are illegal, unlawful, without authority, based on mala fide intention, against the natural justice, violative of the Constitution and Service Law and equally without jurisdiction, hence the same are liable to be set aside in the best interest of justice.
- b. That both the impugned orders passed by respondents are very much harsh, without any evidence based on surmises & conjectures and is equally against the principle of natural justice.
- c. That during enquiry proceedings neither the appellant was associated in the proceedings nor anyone else examined in support of the charges leveled against appellant similarly no opportunity of hearing been provided to appellant. No allegations mentioned above are practiced by the appellant nor proved against him through any cogent reason or evidence.
- d. That both the respondents No.3 and 4 have not properly evaluated the facts and evidences on record before passing the impugned orders. The appellant was seriously ill and was under treatment at the time which is evident from the impugned order of respondent No.3, but this factum has neither been evaluated nor any further probed. Hence the impugned orders passed by the respondents against the appellant are liable to be set aside.
- e. That the appellant has arrived to the duty during the interval of treatment which is evident from the Naqalmaqad attached with the appeal, which clearly indicate that appellant is duty full and committed official, hence the order passed against the appellant are full of surmises and conjuncture.
- f. That on 13/05/2022 the respondent No.3 issued a letter to Medical superintendent of KDA Headquarter hospital for arranging standard medical board for the examination of the appellant but instead of waiting for the opinion of SMB respondents have initiated disciplinary proceeding, which clearly shows the mala fide of the respondents that they were aware of the medical treatment of the appellant, hence the order issued at the back of appellant are nullity in the eye of law.


- g. That respondent No.3, while passing the impugned order completely ignored the fact the appellant has neither been associated in the inquiry nor any opportunity of hearing is provided to the appellant, moreover all the proceedings conducted at the back of the appellant, hence no standing at the eyes of law, similarly all the proceedings are against the constitution of Pakistan.
- h. That the inquiry officer failed to collect any evidence in support of the charges. No one was examined as witness in presence of appellant nor was appellant confronted with any documentary or other kind of evidence on the basis of which the impugned orders were passed.
- i. That the biasness of the respondents are very much proved from the fact that while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per law.
- j. That while awarding the impugned orders the respondents not bothered to take that the appellant is honest and dedicated officer of Police and left no stone unturned to discharge his duties, along with the 13 years of service at the credit of appellant.
- k. That the impugned orders have been passed in violation of law and rules of disciplinary proceedings and principles of natural justice. The authority wrongly and malafidly based the impugned orders without giving any reason with proof whatsoever, therefore the impugned order is bad in law.
- l. That respondent No. 3 has not decided the departmental appeal / representation in accordance to the rules and regulation which clearly shows mala fide intention thus, has no sanctity in the eyes of law. The act of respondents is totally based on male fide intention which clearly shows discrimination and undue victimization.
- m. That the appellate authority has not provided any personal hearing opportunity to the appellant nor the order passed is speaking one.

It is, therefore, most humbly prayed that on accepting this service appeal, the impugned orders dated 30/01/2023 and order dated 18/05/2023 may graciously be set aside by declaring it

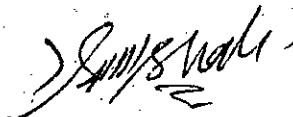
5

illegal, unlawful, without authority, based on mala fide, void abinitio, and thus not sustainable in the eyes of law and appellant is entitled for reinstatement to service with all back benefits of pay and service.

Any other relief not specifically prayed for but deems appropriate in the circumstances of the case may also be granted.

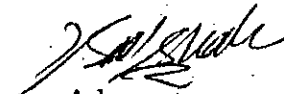
  
Appellant

Through

  
Syed Roman Shah  
Advocate high Court

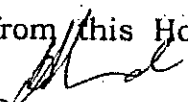
Dated: /06/2023

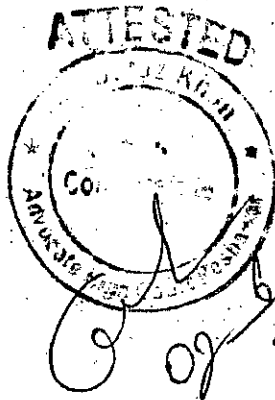
Certified that as per instruction of my client no such appeal has been filed before this Hon'ble Forum.

  
Advocate

AFFIDAVIT

I, Ahmad Nawaz Khan S/o Noor Nwz, Khan R/o Shnawa Gudi Khel, Tehsil Takht e Nasrati District Karak., do hereby solemnly affirm and declare on Oath that the contents of the above appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Hon'ble Tribunal.

  
Deponent





(6)

BEFORE THE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA PESHAWAR

Service Appeal No. /2023

Ahmad Nawaz..... Appellant

Versus

Government of Khyber Pakhtunkhwa and others..... Respondents


ADDRESSES OF THE PARTIES

APPELLANT

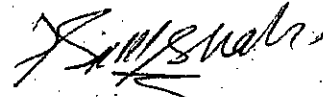
Ahmad Nawaz Khan S/o Noor Nwz Khan R/o Shnawa Gudi Khel, Tehsil Takht  
e Nasrati District Karak.

RESPONDENTS

1. Government of Khyber Pakhtunkhwa, through Chief secretary, Peshawar
2. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
3. Regional Police Officer Kohat region Khyber Pakhtunkhwa
4. District Police officer Hangu, Khyber Pakhtunkhwa,

  
Appellant

Through

  
Syed Roman Shah  
Advocate high Court

Dated: /06/2023

(7)

Annexure - A



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
HANGU

Tel No. 0925-623878 & Fax No. 0925-620135  
Email: dpohangu8@gmail.com

**CHARGE SHEET**

I, **MR. ASIF BAHADER, PSP, DISTRICT POLICE OFFICER, HANGU,** as competent authority under Khyber Pakhtunkhwa Police Rules (amendments 2014) 1975, am of the opinion that you **Constable Ahmad Nawaz No. 161 while posted at Police Lines, Hangu** rendered yourself liable to be proceeded against, as you have omitted the following act/omissions within the meaning of Rule 3 of the Police Rules 1975:-

- i. You, Constable Ahmad Nawaz No. 161 while posted at Police Lines, Hangu have absented yourself from official duty with effect from 19.08.2022 to till date without any leave or prior permission vide DD No. 21, dated 19.08.2022 of Police Lines, Hangu.
- ii. Your absentee shows disinterest, negligence and amount to gross misconduct on your part.

2. By reasons of the above, you appear to be guilty of misconduct under Rule 3 of the Rules ibid and have rendered yourself liable to all or any of the penalties specified in the Rule 4 of the Rules ibid.

3. You are, therefore, required to submit your written statement 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 ex-parte action shall be taken against you.

4. A statement of allegation is enclosed.

*Asif Bahader*  
**ATTESTED**

*[Signature]*  
DISTRICT POLICE OFFICER,  
HANGU



8

OFFICE OF THE  
DISTRICT POLICE OFFICER,  
HANGU

Tel No. 0925-623878 & Fax No. 0925-620135  
Email: dpohangu8@gmail.com

**DISCIPLINARY ACTION**

I, **MR. ASIF BAHADER, PSP, DISTRICT POLICE OFFICER, HANGU,** as competent authority, am of the opinion that you, **Constable Ahmad Nawaz No. 161** have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amendment 2014) as you have committed the following acts/omissions.

- i. You, Constable Ahmad Nawaz No. 161 while posted at Police Lines, Hangu have absented yourself from official duty with effect from 19.08.2022 to till date without any leave or prior permission vide DD No. 21, dated 19.08.2022 of Police Lines, Hangu.
- ii. Your absentee shows disinterest, negligence and amount to gross misconduct on your part.

2. For the purpose of scrutinizing the conduct of said accused with reference to the above allegations DCP HQ is appointed as enquiry officer. The enquiry officer shall in accordance with provision of the Police Rule-1975, provide reasonable opportunity of hearing to the accused official, record his findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

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

  
DISTRICT POLICE OFFICER,  
HANGU

No. 81 /EC, dated 01 / 09 /2022.

Copy of above to:-

1. \_\_\_\_\_ :- The Enquiry Officer for initiating proceedings against the accused under the provisions of Police Rule-1975.
2. The **Accused official**:- with the directions to appear before the Enquiry Officer, on the date, time and place fixed by him, for the purpose of enquiry proceedings.

  
ATTESTED

(9)

Annexure-B



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
HANGU

Tel: 0925-623878 Fax 0925-620135

No. 359 /EC dated Hangu the 29 /12 /2022

**FINAL SHOW CAUSE NOTICE**

1. I, **Asif Bahader, (PSP), District Police Officer, Hangu** as competent authority, under the Khyber Pakhtunkhwa Police Rules 1975, (amended 2014) is hereby serve you, **Constable Ahmad Nawaz No. 161 while posted at Police Lines, Hangu** as follow:-

- i. That consequent upon the completion of inquiry conducted against you by the inquiry officer in which you have given full opportunity of hearing, but you failed to appear the enquiry officer and still absented thus, held you guilty for the charges levied against and recommended you for awarding a major punishment vide his office finding No. 2145/SDPO, dated 19.12.2022.
- ii. From going, through the finding and recommendations of the inquiry officer, the material on record and other documentary proof including your defense before the inquiry officer.

I am satisfied that you have committed the following acts, omissions, specified in section 3 of the said ordinance.

- i. **You, Constable Ahmad Nawaz No. 161 while posted at Police Lines, Hangu have absented yourself from official duty with effect from 25.10.2022 to till date without any leave or permission vide DD No. 22, dated 25.10.2022 Police Lines, Hangu.**
- ii. **Your absence shows your disinterest, negligence and amount to gross misconduct on your part.**

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you major penalty provided under the Rules ibi f.

3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you also intimate whether you desire to be heard in person.

4. If no reply to this notice is received within 07 days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.

5. The copy of the finding of inquiry officer is enclosed.

*Asif Bahader*  
**ATTESTED**

*[Signature]*  
DISTRICT POLICE OFFICER,  
HANGU



10

OFFICE OF THE <sup>Annex - C</sup>  
DISTRICT POLICE OFFICER,  
HANGU

Tel: 0925-623878 Fax 0925-620135

### ORDER

This order is passed on the departmental enquiry against Constable Ahmad Nawaz No. 161 while posted at Police Lines, Hangu under the Khyber Pakhtunkhwa Police Rules 1975 (Amendment 2014).

Brief facts of the case are as under:-

- i. Constable Ahmad Nawaz No. 161 while at Police Lines, Hangu has absented himself from official duty with effect from 25.10.2022 to till date without any leave or permission vide DD No. 22, dated 25.10.2022 Police Lines, Hangu.
- ii. His absence shows his disinterest, negligence and amount to gross misconduct on his part.

He was served with Charge Sheet and statements of allegations under the Khyber Pakhtunkhwa Police Rules 1975 (Amendment 2014) vide this office No. 149/EC, dated 24.11.2022, to which he failed to submit his reply to the DSP, City Hangu, who was appointed as Enquiry Officer to conduct departmental enquiry against him. After completion of enquiry, the Enquiry Officer submitted his finding report vide No. 2145/SDPO, dated 19.12.2022 in which the defaulter Constable Ahmad Nawaz No. 161 was periodically summoned for giving full opportunity of hearing, but he failed to appear before the enquiry officer and still absented thus, held him guilty for the charges leveled against him and recommended to be awarded him a major punishment.

Also, the defaulter Constable Ahmad Nawaz No. 161 was called in orderly room on 21.12.2022, but he did not appear before the undersigned. Consequently, a Final Show Cause Notice was issued to him this office vide No. 359/EC, dated 22.12.2022, but he also failed to submit his reply. Subsequently, a Notice was advertised in daily newspaper regarding issuing of Last Notice to him for appearing/making his arrival report at Police Lines Hangu within 07 days positively, but no response could be received from his side so far.

Keeping in view of above and having gone through available record, the undersigned has arrived at the conclusion that defaulter Constable Ahmad Nawaz No. 161 did not make his arrival report at Police Lines, Hangu up-till now and still absented, which indicates that he is not more interested to serve the Police Department. Moreover, in these circumstances, his retention in Police Department is burden on public exchequer, therefore, I, Asif Bahader, (PSP), District Police Officer, Hangu in exercise of the powers conferred upon me under the Rules ibid, dispense with general proceedings and awarded him a major punishment of **Dismissal from Service with immediate effect.**

Order Announced.

OB No. 53

Dated 19/6/2023

  
DISTRICT POLICE OFFICER,  
HANGU

OFFICE OF THE DISTRICT POLICE OFFICER, HANGU.

No. 567-70/EC, dated Hangu, the 30/07/2023

Copy of above is submitted to the Regional Police Officer, Kohat Region, Kohat for favour of information, please.

2. Pay Officer, EC, Reader & OHC for necessary action.

  
ATTESTED

  
DISTRICT POLICE OFFICER,  
HANGU

To,

The Regional Police Officer,  
Kohat Region, Kohat.

Subject: Departmental appeal

Respected Sir,

With profound regards, appellant submits departmental appeal against the order bearing OB No 52 dated 26.01.2023, passed by District Police Officer, Hangu vide which appellant was dismissed from service.

FACTS

1. That appellant was recruited as constable in police in the year 2008. Appellant qualified recruit course and was rendering services to the entire satisfaction of Senior and Superior Officers.
  2. That in the year 2022, appellant suffered from mental disease and was unable to perform police duties therefore the elders of the family of appellant continued the treatment of the appellant privately and on self help basis.
  3. That District Police Officer Hangu was pleased to refer appellant to Standing Medical Board vide his Office letter No 3022/OASi dated 17-05-2022 but appellant failed to join pursue the recommendations of District Police Officer Hangu. Copy of the letter is enclosed.
  4. That appellant was managing treatment through elders of the family and with grace of "Almighty Allah" appellant has regained health and is become fit for duty, therefore appellant paid visit to Police Lines Hangu for joining duties but was shocked to know that appellant ~~has~~ <sup>was</sup> dismissed from service in absence, hence submits departmental appeal
- Continued on Page 2

ATTESTED

on the following grounds (2) (12)

4 GROUNDS

- (a) That it was on the record of service dossier of the appellant that appellant was suffering from mental disease and was under treatment. District Police Officer Hanga had rejected appellant for examination through Scanship Medical Board. Therefore the impugned order has wrongly been passed and the same is against the facts on record.
- (b) That the impugned order has been based on ex-parte enquiry proceedings. No charge sheet was served on appellant. No one was examined as a witness in presence of appellant. No final Show-Cause Notice was served on appellant. In the same vein appellant was not neither heard in person nor confronted with any evidence supporting the charge. Therefore the whole departmental file has been prepared against the law and rules governing the disciplinary proceedings.
- (c) That the alleged absence from duty of appellant was neither wilful nor deliberate but it was due to ailing health of appellant. The lower authority was well in picture about the ailing health of appellant. Therefore the impugned order has wrongly been passed and is worth set aside.
- (d) That the alleged absence from duty charges have wrongly been levelled against appellant. Appellant was not absent but was <sup>impt</sup> ~~not present~~ for duty by the time.
- (e) That the lower authority did not take into account the long period of service and unblemished record of appellant while passing the impugned order.

It is therefore requested that the impugned order may please be set aside and appellant may be re-instated in service with all back benefits and oblige.

Enclosures.

- 1) Copy of impugned order
- 2) Copy of DPO letter addressed to Mrs KDA Headquarters Hospital.

Your Obediently  
Ahmad Nawaz 161  
Ex-Constable No 885/161  
District Hanga.  
Cell No

Handwritten signature  
**ATTESTED**

(13)

Annexure - I

Enty

**ORDER.**

This order will dispose of the departmental appeal, preferred by Ex-Constable Ahmad Nawaz No. 161 of district, Hangu against the order of District Police Officer, Hangu whereby he was awarded major penalty of dismissal from service vide OB No. 59, dated 26.01.2023. Brief facts of the case are that the appellant while posted at Police Lines, Hangu absented himself from the official duties with effect from 25.10.2022 till the date of his dismissal i.e. 26.01.2023. He had failed to avail proper leave or permission of the competent authority, hence, reported absent vide DD No. 22 dated 25-10-2022 Police Lines, Hangu. The defaulter official remained absent for total period of 03 months.

Proper departmental enquiry proceedings were initiated against him and SDPO City, Hangu was nominated as Enquiry Officer. The appellant was summoned time and again but he failed to appear before the enquiry officer. The Enquiry Officer after fulfillment of codal formalities submitted enquiry findings. He was, therefore, recommended for major penalty under the relevant rules.

The appellant was also called in Orderly Room held on 21-12-2022 by the District Police Officer, Hangu where he did not appear. Consequently, a Final Show Cause Notice was issued to him vide DPO, Hangu office No. 359/EC, dated 22-12-2022 which was not replied to as well. Finally, the last notice for appearance / arrival report within seven (07) days at Police Lines, Hangu was also published in the newspaper. However, he did not respond.

Keeping in view recommendations of the Enquiry Officer and the above cited circumstances, the defaulter official was awarded major punishment of dismissal from service under the relevant rules by the District Police Officer, Hangu vide OB No. 59 dated 26.01.2023.

Feeling aggrieved from the order of District Police Officer, Hangu, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in the office of the undersigned on 08.05.2023. During personal hearing the appellant contended that his absence was not intentional. He stated that he was a patient of depression / mental phobia and, therefore, could not resume the duty.

From the perusal of the enquiry file, service record of the appellant and the reasons advanced by Ex-Constable Ahmad Nawaz No. 161 during personal hearing it is clear that the appellant is also a patient of mental disorder who is still under treatment. He has almost 12 years of service at his credit.

Keeping in view the service length and mental condition of the appellant Ahmad Nawaz Ex-Constable No.161, I, **Sher Akbar, PSP S.St, Regional Police Officer, Kohat**, being the appellate authority, is constrained to take a lenient view of his misconduct. Hence the punishment of dismissal from service is, therefore, modified into major punishment of compulsory retirement from service under the Khyber Pakhtunkhwa Police Rules, 1975.

**Order Announced**

No. 5560 /EC, Dated Kohat the 18/05 /2023

  
**Regional Police Officer,**  
**Kohat Region**

Copy forwarded to District Police Officer, Hangu for information and necessary w/r to his office Memo: No. 2058/LB, dated 10.04.2023. His Service Record is returned herewith.

  
**ATTESTED**



(14)



OFFICE OF THE  
DISTRICT POLICE OFFICER,  
HANGU

Tel No. 0925-623878 & Fax No. 0925-620135  
Email: dpohangu8@gmail.com

3002 / OASI, dated 17/05/2022.

To: The Medical Superintendent,  
KDA, DHQrs Hospital, Kohat.

Subject:- STANDING MEDICAL BOARD.

Memorandum:

Please refer to the subject cited above.

It is submitted that Constable Ahmad Nawaz No. 835 was enlisted in Police Department as Constable on 20.11.2008. He served the Police Department more than 13 years, but now he is suffering from disease as mentally abnormal and the Doctor MBBS, MCPS, FCPS (UK) in Child Psychiatry Consultant AFIMH Advisor in Psychiatry Professor of Psychiatry, Rawalpindi has declared him unfit/out of duty and unable to discharge his duty being under treatment; while his medical treatment documents are annexed for perusal. Since he becomes completely disable to serve more the force therefore, the department has decided to discharge him on medical ground by arranging a Standing Medical Board at your end.

It is therefore, requested that a Standing Medical Board may kindly be arranged in this regard to invalid him out on pension by intimating this office immediately, please.

DISTRICT POLICE OFFICER,  
HANGU

ATTESTED



(15)

DISTRICT POLICE OFFICER,  
HANGU  
Tel No. 0925-623878 & Fax No. 0925-620135  
Email: dpohangu8@gmail.com

No. 3774 /OASI, Dated: 29 16 /2022.

**1<sup>st</sup> Reminder  
Most immediate**

To: The Medical Superintendent,  
KDA, DHQrs, Hospital,  
Kohat.

Subject:- **STANDING MEDICAL BOARD.**

Memorandum:

Please refer to this office Memo: No. 3002/OASI,  
dated 17.05.2022 and intimate present position of the case so as to  
proceed further to the matter, please.

  
DISTRICT POLICE OFFICER,  
HANGU

  
ATTESTED

(17)

# HUSSAIN CLINICAL LABORATORY




PIN : 0  
Name : Ahmad Nawaz  
Age : 37 Year(s)  
Gender : Male

Date : 13/9/2022 12:03 AM  
Ref By : Dr.  
Specimen : Blood

## SEROLOGY

TEST	RESULT
Covid 19	Negative

This is a digitally verified report and does not require signature. 

*Ahmad Nawaz*  
**ATTESTED**

18

PLACE  
DATE

### CERTIFICATE OF MEDICAL FITNESS

I, Dr. DY ASIF GHARODY do here certify that I have carefully examined Mr /Ms AHMAD NAWAZ son/daughter of NODR NAWAZ age \_\_\_\_\_ whose signature is given below, is fit both physically and mentally for duties in government/private organization. I further certify that before arriving this decision, I carefully reviewed his previous medical status.



Signature of the Applicant

  
Name & signature of the Medical Officer  
with seal and registration number

Name & signature of the Medical Officer  
with seal and registration number

CERTIFICATE OF MEDICAL FITNESS

I, Dr. Asif Ghazoor do hereby certify that I have carefully examined Mr. AHMAD NAWAZ son/daughter of NOOR NAWAZ age whose Signature is given below is fit both physically and mentally for duties in government/ Private organization. I further certify that before arriving this decision, I carefully reviewed his previous Medical status.

- Sd -  
Signature of Applicant

- Sd -  
Name & Signature  
of Medical Officer

لکھنؤ 28 روزنامہ 09/02/13

مدرسہ عالیہ ازبکستان ہنگو 13/09/02 وقت 17:55 یہ اس وقت کیشل  
 انجمن کو از 161 غیر حاضر شدہ جو اجماع 2 روزنامہ 08/02/19 سے حاضر  
 بنائی گئی۔ دوران ہستی افسران ہنگو کو زبانی جواب دینا۔ اب میں  
 حاضر آتا ہوں۔ قریب ہنگو آج آؤں۔ آمد پر مذکورہ ہنگو کیشل کی  
 ہنگو درج روزنامہ سے رقم لکھنے کی وجہ سے لکھنے سے مناسب  
 کارروائی افسران ہنگو کو ارسال ہوگی۔

صاحب عالی

لکھنؤ پولیس لائنس

Handwritten signature

NM Police Line Hangu

13-09-022

Police Lines  
Hangu

بھنور جناب DPO صاحب ہنگو

جناب عالی!

گزارش کی جاتی ہے۔ کہ سائل ضلع کرک کا مستقل رہائشی ہے۔ اور ضلع کرک میں محکمہ پولیس میں بھرتی ہو کر اپنی ڈیوٹی احسن طریقے سے سرانجام دی ہے۔ کچھ عرصہ قبل سائل کا ٹرانسفر ضلع کرک سے ضلع ہنگو ہو کر مگر سائل کو بیماری کی وجہ سے ڈیوٹی سرانجام دینے میں شدید تکلیف کا سامنا تھا۔ سائل نے مختلف ڈاکٹر صاحبان سے چیک اپ کر کے جنہوں نے سائل کو ڈیوٹی کیلئے ان فٹ قرار دیا۔ جس پر جناب DPO صاحب نے من سائل کو میڈیکل بورڈ پر ریٹائرڈ ہونے کیلئے متعلقہ حکام کو تحریر کیا۔

لہذا من سائل اب صحت یاب ہو چکا ہے۔ اور مورخہ 13.09.2022 کو Type C ہسپتال تخت نصرتی ضلع کرک بغرض چیک اپ جا کر جہاں پر ڈاکٹر آصف غفور صاحب نے چیک اپ کرنے کے بعد من سائل کو مکمل صحت یاب اور ڈیوٹی کیلئے فٹ قرار دیا۔ میڈیکل کاغذات لف ہذا ہیں۔ علاوہ ازیں من سائل لوئر کورس کیلئے بھی منتخب ہو چکا ہے اور مورخہ 16.09.2022 کو PTC ہنگو میں حاضری بھی مقرر ہے۔

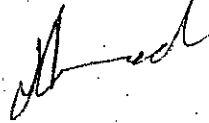
لہذا من سائل کو میڈیکل بورڈ پر ریٹائرڈ ہونے کیلئے متعلقہ حکام کو میڈیکل بورڈ مقرر کرنے کیلئے تحریر کیا گیا ہے اس کو منسوخ کر کے لوئر کورس PTC جانے کا حکم صادر فرمایا جائے۔

سائل تاحیات دعا گور ہے گا۔

تحریر 14.09.2022

العارض

اپکا تابع فرمان کنسٹیبل احمد نواز نمبر 835 متعینہ پولیس لائن ہنگو



(21)

**DHQ HOSPITAL KARAK**

**OPD Ticket**

Date: 25-10-22 S.No. 39300

CRP No 9560 Monthly OPD No \_\_\_\_\_

Patient Name: جاسم Age \_\_\_\_\_ Sex M

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

Provisional Diagnosis: Low Back Pain

Clinical Findings

Treatment

Low back pain  
Tenderness  
Spinal rigidity

Investigations

MR 4

MR 27

SCNT 2/2  
L  
R 30



(22)

**DHQ HOSPITAL KARAK**  
**OPD Ticket**

Date: 24-11-2022 S.No. 20599

CRP No. 8926 Monthly OPD No. 20

Patient Name: احمد زوني Age      Sex M

Father's/Husband Name     

Provisional Diagnosis Low BM

Clinical Findings

Treatment

Investigations

*Handwritten notes in Clinical Findings:*  
Clear  
2 E m left  
No Malt  
No scale phos  
No h  
No Wk  
No Psych  
No hyp

23

DHQ HOSPITAL KARAK

OPD Ticket

Date: 26-12-2022 S.No. 39258

CRP No \_\_\_\_\_ Monthly OPD No. 9124

Patient Name: 1/2/21 Age \_\_\_\_\_ Sex \_\_\_\_\_

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

Provisional Diagnosis: *Handwritten text*

Clinical Findings

Treatment

*Handwritten clinical findings and treatment notes*

Investigations

*Handwritten investigation notes*

*Handwritten notes*

*Handwritten notes*

*Handwritten notes*

(24)



**OFFICE OF THE MEDICAL SUPERINTENDENT  
DISTRICT HEADQUARTER HOSPITAL KARAK**

**MEDICAL FITNESS CERTIFICATE**

**Certified that I have examined Mr: Ahmad Nawaz R/O Guddi  
Khel Tehsil: Takhti Nasrati District: Karak and found him fit  
both Physically & Mentally.**

Dr. Jamil Ahmad  
DHO Hospital KDA Karak

Medical Officer  
DHO Hospital Karak

25/01/2023

(25) از دفتر صاحب دفتر؟ انچارج سند عمل آدم

تعداد 10000 کتب در دسترس است و این کتب در دسترس است  
 16/09/2022  
 انچارج صاحب دفتر، دفتر سند عمل آدم، دفتر سند عمل آدم  
 کو کمریو کمریو، دفتر سند عمل آدم، دفتر سند عمل آدم  
 دفتر سند عمل آدم، دفتر سند عمل آدم، دفتر سند عمل آدم  
 دفتر سند عمل آدم، دفتر سند عمل آدم، دفتر سند عمل آدم

1. صدیق الله 766 دفتر سند عمل آدم
2. احمد نواز 835 طاب فلاح سنگو
3. محمد عارف 583 QRF
4. راشد زمان 241 EF
5. اهل خان 348 دفتر سند عمل آدم
6. شکیل علی 56 EF
7. طهوان الله 2307 QRF
8. انور اقبال 696 EF

Attested  
 ATTESTED

ASCC  
 12/09/2022

بعدالت سر ڈسٹریکٹ جج اور سول جج کے حوالے سے

Appeal No 12013

Appellant 2. منجانب  
احمد نواز خان بنام گورنمنٹ وٹلر 0

مقدمہ 58782301-14202-NIC#  
دعویٰ 9918830-0333-Phone  
جرم

### باعث تحریر آنکے

ان کے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی اور جواب دہی وکل کاروائی متعلقہ  
آن مقام کے قریب رہتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دیا گیا۔ نیز  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دیا گیا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقریرتالہ فیصلہ برحلف دیے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور صولی چیک دروپیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرنے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یا پکٹرفہ یا اپیل کی برادگی 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 تقریر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بااختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب 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  
مذکورہ کریں۔ لہذا ادا کالت نامہ لکھ دیا کہ مندر ہے۔

Attested  
Accepted  
2023 06 ماہ 01  
المقام

کے لئے منظور ہے۔  
Khan

Handwritten signature

Handwritten signature

المقام

احمد نواز خان منام گورنمنٹ وٹلر  
منام گورنمنٹ وٹلر