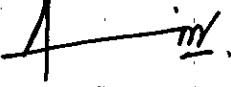


# FORM OF ORDER SHEET

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

**Appeal No.** \_\_\_\_\_

**1315/2023**

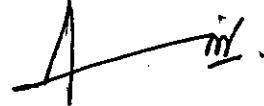
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/06/2023	<p>The appeal of Mr. Muhammad Tajdar resubmitted today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <b>16-06-2023</b>.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mr. Muhammad Tajdar Ex-Constable No. 1788 FRP HQrs Peshawar received today i.e on 09.06.2023 is incomplete on the following score which is returned to the counsel for the appellat for completion and resubmission within 15 days.

- 1- Application for condonation of delay attached with the appeal is unsigned.
- 2- Annexure-A & H of the appeal are illegible which may be replaced by legible/better one.

No. 1719 /S.T.

Dt. 12-06 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Taimur Ali Khan Adv.  
High Court Peshawar.

Respected Sir,

1- Removed

2- Annexure-A & H have made better copies

Resubmitted after compliance



14/6/2023.

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

SERVICE APPEAL NO. 1315 /2023

Muhammad Tajdar

V/S

Police Deptt:

**INDEX**

S. No.	Documents	Annexure	P. No.
01	Memo of appeal	-----	01-04
02	Affidavit	-----	05
03	Condonation of delay application	-----	06-07
04	Copy of medical	R-1	08-19
05	Copy of FIR	A	20
06	Copy of order dated 22.06.2022	B	21
07	Copy of bail order dated 22.06.2022	C	23-24
08	Copies of charge sheet along with summary of allegations and reply to charge sheet	D&E	25-27
09	Copies of show cause notice and reply to show cause notice	F&G	28-29
10	Copy of order dated 27.07.2022	H	30
11	Copies of departmental appeal, rejection order dated 23.08.2022 and revision	I,J&K	31-34
12	Vakalat Nama	-----	35

APPELLANT

THROUGH:



(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT  
03339390916

(11)

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

SERVICE APPEAL NO. 1315 /2023

Muhammad Tajdar Ex-Constable No.1788,  
FRP HQrs: Peshawar.

(APPELLANT)

VERSUS

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Commandant Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.
3. The Deputy Commandant Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.

(RESPONDENTS)

-----

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 27.07.2022, WHEREBY THE APPELLANT WAS REMOVED FROM SERVICE WITH IMMEDIATE EFFECT AND HIS ABSENCE PERIOD AS WELL AS INTERVENING PERIOD WAS TREATED AS LEAVE WITHOUT PAY, AGAINST THE ORDER DATED 23.08.2022, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED AND AGAINST NOT TAKING ACTION ON THE REVISION OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

**PRAYER:**

THAT THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 27.07.2022 AND 23.08.2022 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED INTO HIS SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

**RESPECTFULLY SHEWTH:****FACTS:**

1. That the appellant was appointed in the respondent department in the year 2009 and was performing his duty with great devotion and honesty, whatsoever, assigned to him and no complaint has been filed against him regarding his performance.
2. That the appellant was going to attend the patient at Garhi Kapoora Mardan on Motor Cycle and on the way he gave lift to a person and there was a police check post on Muhab Banda Mardan, who stopped the appellant on the check post and the person who has given lift by the appellant on seeing the police party ran away and the police party also pursued him, but they did not catch him and when the police party came to the spot they told the appellant that Charas has been recovered from him and alleged him that he is your companion on which the appellant told to police that he gave him only lift in the way and did not know him but the police falsely implicated the appellant in FIR No.451 dated 19.06.2022 U/S 9C-CNSA, PS Garhi Kaoopra District Mardan and arrested him on the spot. **(Copy of FIR is attached as Annexure-A)**
3. That on the basis of above FIR, the appellant was suspended with immediate effect and Reserve Inspector was nominated as Inquiry Officer to conduct proper departmental inquiry and report vide order dated 22.06.2022. **(Copy of order dated 22.06.2022 is attached as Annexure-B)**
4. That the appellant filed bail petition which was allowed by the competent court of law on 22.06.2022. **(Copy of bail order dated 22.06.2022 is attached as Annexure-C)**
5. That charge sheet dated 22.06.2022 along with summary of allegations were issued to the appellant in which DSP Legal, Habib Khan was appointed as inquiry officer. The appellant submitted properly reply to the charge sheet in which he denied the allegations and gave the real facts about the issue. **(Copies of charge sheet along with summary of allegations and reply to charge sheet are attached as Annexure-D&E)**
6. That inquiry if so conducted, the appellant was never associated with the inquiry proceeding and the appellant handed over the reply of charge sheet to the PA of the Deputy Commandant and not allowed to meet with inquiry officer. Even the inquiry report was not provided to the appellant.

7. That show cause notice was issued which was replied by the appellant in which he once again denied the allegation and gave the real facts about the issue. (Copies of show cause notice and reply to show cause notice are attached as Annexure-F&G)
8. That on the basis of one sided inquiry if so conducted, the appellant was removed from service with immediate effect and his absence period as well as intervening period was treated as leave without pay vide order dated 27.07.2022. (Copy of order dated 27.07.2022 is attached as Annexure-H)
9. That the appellant filed departmental appeal against the removal order dated 27.07.2022, which was rejected for no good grounds on 23.08.2022. The appellant then filed revision which was not responded within the statutory period of ninety days. (Copies of departmental appeal, rejection order dated 23.08.2022 and revision are attached as Annexure-I,J&K)
10. That the appellant has no other remedy except to file the instant service appeal in this Honourable Tribunal on the following grounds amongst others.

**GROUNDS:**

- A. That the impugned orders dated 27.07.2022 and 23.08.2022 are against the law, rules, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B. That the appellant was never associated with the inquiry proceeding if so conducted inquiry against the appellant, which is violation of law and rules and as such the impugned orders are liable to be set aside on this ground alone.
- C. That no opportunity of defense was provided to the appellant during inquiry proceeding if so conducted, which is violation of Article-10A of the Constitution of Pakistan.
- D. That in reply to charge sheet and show cause notice the appellant denied the allegations, but despite that the appellant was dismissed from service without conducting the regular and proper inquiry which is not permissible under the law and rules.
- E. That the FIR was lodged against the appellant and as per Police Rules 1934, the appellant should be suspended till the conclusion of criminal

pending against him, but without waiting to the conclusion of criminal case, the appellant was removed from service, which is violation of Police Rules 1934.

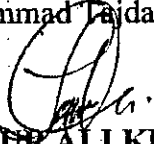
- F. That CSR-194 is also clear in the matter that when FIR was lodged against the civil servant, he should be suspended till the conclusion of criminal case, but without waiting to the conclusion of criminal case, the appellant was removed from service, which is violation of CSR-194.
- G. That as per Superior Court judgments, mere filling of FIR does not proves a person to be guilty of the commission of offence, rather he would be presumed innocent unless convicted by the court of competent jurisdiction.
- H. That the appellant has been condemned unheard and has not been treated according to law and rules.
- I. That in the impugned removal order dated 27.07.2022, it was mentioned that the absence period as well as his intervening period of the appellant was treated as leave with pay but the appellant did not remain absent from his duty and regularly performed duty till his removal order.
- J. That the appellant seeks permission of this Honourable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

M. Tajdar

APPELLANT  
Muhammad Tajdar

THROUGH:



(TAIMUR ALI KHAN)  
ADVOCATE HIGH COURT

5

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

**SERVICE APPEAL NO. \_\_\_\_\_/2023**

Muhammad Tajdar

V/S

Police Deptt:

**AFFIDAVIT**

I, Muhammad Tajdar Ex-Constable No.1788, FRP HQrs: Peshawar (Appellant), do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this august Court.

**DEPONENT**

Muhammad Tajdar  
(APPELLANT)



(6)

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

SERVICE APPEAL NO. \_\_\_\_\_/2023

Muhammad Tajdar

V/S

Police Deptt:

-----

**APPLICATION FOR CONDONATION OF DELAY IN THE**  
**INSTANT APPEAL**

**RESPECTFULLY SHEWETH:**

1. That the appellant has filed the instant appeal in this Honorable Tribunal against the order dated 27.07.2022 and 23.08.2022 in which no date is fix so for.
2. That the departmental appeal of the appellant was rejected on 23.08.2022 and then he filed revision under 11-A on 14.09.2022, however, his revision was not decided within the stipulated period of ninety days and then the appellant should filed his service appeal in this Honorable Tribunal within next 30 days, but the appellant was suffered from disease Nodular Sclerosis classic Hodgkin lymphoma (Cancer) due to which he was under treatment, therefore, he could not file his service appeal in this Honorable Tribunal within stipulated period of 30 days after the lapse of 90 days and he is still under treatment, however, he is now little bit recovered from his disease and wants to file this service appeal in this Honorable Tribunal. (Copy of medical prescriptions are attached as Annexure-R-1)
3. That Honorable Supreme Court of Pakistan has held that decision on merit should be encouraged rather than knocking-out the litigants on than technicalities including limitation. Therefore, appeal needs to be decided on merit (PLD-2003(SC)-724).
4. That the appellant has good prime facie case and to be decided on merit to meet the ends of justice.

It is therefore, most humbly prayed that on the basis of above submission (medical ground), the instant appeal may kindly be decided on merit by condoning the delay to meet the ends of justice.

**APPELLANT**  
Muhammad Tajdar

THROUGH:

**(TAIMUR ALI KHAN)**  
**ADVOCATE HIGH COURT**

**AFFIDAVIT**

It is affirm and declared that the contents of this application are true and correct and nothing has been concealed from this Honorable Tribunal.

**DEPONENT**

R-I 8



We Serve Humanity

**CMH Peshawar**

Receipt No. 236812

Contact : 0919214154

Dated : 6-Mar-2023 17:20:25

**OUTDOOR CONSULTATION RECEIPT**

(Patient Copy)

Name	Muhammad Tajdar	Patient ID	287191
Age/Gender	33/Male	Address	Peshawar
Department	Surgical	Specialist	Lt Col Muhammad Wajih Uddin Butt
Fee	1400	Receptionist	faizanbabar
Mobile No.	000		

This is a Computer Generated Slip Hence needed not to be Signed

9

پروفیسر سر جن

ڈاکٹر وقار عالم جان

ایم بی بی ایس (کولڈیٹس)، ایف سی پی ایس (پاک)

ایف سی ایس (کاسک، بکے) ایف سی ایس ایس (امریکہ)

ویزیٹنگ سرجن: پوسٹ گریجویٹ میڈیکل کالج



ماہر امراض

گردہ، مثانہ، پیشاب، اپنڈیکس، ہرنیا

پراسٹیٹ، بوائس، جنرل سرجری

انچارج: لیڈی ریڈنگ ہسپتال سرجیکل وارڈ پشاور

PtName MUHAMMAD TAJDAN Age \_\_\_\_\_ Sex Male Date 26/3/2023

Clinical Record

*Pxx*

*Hard lump (natted lymph Node)  
in left Supraclavicular region*

*Hard lump in lymph??*

*Phlegm*

*Adt-Male by D-unit  
for L-Node Biopsy  
under GA.*

*Ac*

*A h  
C  
C  
C*

*Ad CT scan  
chest*

*(PPD) حبرات کدروزر مریکل 30/3/2023*

*و انبلا کے لیے آکر سلا*

*برائے رابطہ 7-70*

بروز اتوار 4-9 بجے ۲۱

روزانہ 4 بجے سے شام تک

برائے رابطہ

0313-6281234

ایوب میڈیکل کونزٹی روڈ شہید رفورت خیبر میڈیکل سنٹر ڈگری گارڈن پشاور 0312-9172287 0316-6281148



# Institute of Radiotherapy and Nuclear Medicine (IRNUM)

10

University Campus, Peshawar

Phone :091-9222154/7

Fax :091-9221223

Email :

PRN: 004060/23

Name: Muhammad Tajdar S/O Shehriyar

Lab No.: 2304100568

Age: 33 Year(s)

Gender: Male

Specimen Date: 14-Apr-2023 9:17

Referred By :

Sample : Collected at this center.

## HEMATOLOGICAL INVESTIGATIONS

Test	Results Unit	Reference Range
Haemoglobin	10.8 g/dL	13 --- 18
WBC Counts	19.04 x 10 <sup>3</sup> /uL	4.0 --- 11.0
RBC Counts	4.50 x 10 <sup>6</sup> /uL	3.80 --- 5.30
HCT	31.9 %	34.0 - 48.0
MCV	70.9 fL	80 --- 100
MCH	24.0 pg	27 - 32
MCHC	33.8 g/dL	32 --- 36
Platelet Count	613 x 10 <sup>3</sup> /uL	150 - 450
NEUT	77.6 %	45 - 70
LYM	17.8 %	25 --- 40
MON	1.4 %	02 --- 10
EOS	2.6 %	01 --- 06
BASO	0.6 %	0.0 --- 0.2
RDW	16.3 %	
MPV	5.4 fL	
Neut	14.78 x10 <sup>9</sup> /l	
Lym	3.39 x10 <sup>9</sup> /l	
Mono	0.27 x10 <sup>9</sup> /l	
Eos	0.50 x10 <sup>9</sup> /l	
Baso	0.11 x10 <sup>9</sup> /l	

### Comments :

Advia 560 AL

Adh  
Lcmw Eff.  
U/sabdpekr



# Institute of Radiotherapy and Nuclear Medicine (IRNUM)

University Campus, Peshawar

Phone:- 091-9222154/7

Fax:- 091-9221223

Email:-

## Hospital Services Payment Order

PRN: 004060/23 (General) File# NIL Entitlement: Non-Entitled  
 Patient Name: Muhammad Tajdar S/O Shehriyar  
 Age/Sex: 33 Year(s) / Male City: Peshawar Native: Pakistan  
 Contact Nos.: Mobile: 03465656427  
 OPD No.: ONC-23/0019899 Visit No.: 1 Entry on: 14-Apr-2023 08:58:41 AM  
 Referred By: Registration Fee not paid.

### Cash

Consultation (1ST Visit)	500.00
Registration	100.00
<b>Total Amount (Rs.):</b>	<b>600/-</b>

Patients can view/print their Diagnostic Results by visiting our website and entering following credentials.

h ://221.120.239.188:8080/AECHOnline Username:004060/23 Password:02864047

ly doxo 1KV - 10mgd  
 s Bleomycin - 13mgd,  
 " Vinblastine - 10mgd,  
 " Dacarbazine - 60mgd,  
 ly Setruil (1)  
 " avil (1)  
 s Omega 40  
 " decedrin 20  
 s Neurobion (1)  
 inf N/S 500cc (1)  
 " " 100cc (1)  
 iV Cannula (1)  
 Tab Onset (10)  
 " V/S (1TI)  
 Tab Bufexo 1700

Dr. Noor Ul Ain Ainy  
 Chief Consultant

Nexl

2/8/23



# Institute of Radiotherapy and Nuclear Medicine (IRNUM)

University Campus, Peshawar

Phone:-091-9222154/7

Fax:-091-9221223

Email:-

## RECEIPT FOR TEST/TREATMENT

Patient Copy

**IRNUM**

Received with thanks from

Muhammad Tajdar S/O Shehriyar

PRN 004060/23 ( Non-Entitled )

vide Receipt No. N/23/04/02602 dated: 14-Apr-2023

a sum of Rs. 600/- (Rupees

Six Hundred only

on account of Registration (100/-), Consultation (1ST Visit) (500/-)

PIN (81102) on 14-Apr-2023 09:02:42 AM

This is a computer generated receipt and it does not require any signature or stamp.

**IPWS PHARMACY**IRNUM HOSPITAL  
University Campus Peshawar

13

Date: 14/04/2023 10:52:13 Alias: SH M/s : HEALTH CARD  
 Invoice No.: 73413  
 User: ASMA  
 Ref: dr ainy  
 Remarks: MUHAMMAD TAJDAR KP-17426965 R-004060/ Message: akjds kaj  
 Sales Man: SALESMAN1

Qty	Packing	Item Name	Sale Price	Total
4		PLASLINE 100 MI	83.63	334.52
1		PLASALINE 500CC	85.00	85.00
1		DRIPSET SHIFA	140.00	140.00
1		CANNULA IV 22 B.B	290.00	290.00
2		DECADRAN 1CC	23.00	46.00
1		AVIL INJ	8.00	8.00
1		ONSET INJ PBM	90.00	90.00
1		NEUROBION	28.00	28.00
1		OMEGA IV 40MG	220.00	220.00
1		NAPRODOX 50MG	2600.00	2600.00
1		BLASVIN 10MG PBM	609.00	609.00
1		BLEONCO-S 15MG	2270.00	2270.00
4		DECARB 200MG	780.00	3120.00
1		STICKING TAPE	130.00	130.00
21		Gross Total:		9970.52
Total No. of Items: 14			Net Total:	9,971.00

NINE THOUSAND NINE HUNDRED SEVENTY ONE RUPEES ONLY



ABCDEFGHIJKLMN OPQRSTUVWXYZABCDEFGHIJKLMN OPQRSTUVWXYZABC  
 FGDFGDFG

Terms:

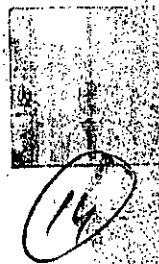
Computer Software developed by Abuzar Consultancy. Ph 042-37426911-15)





# Shaukat Khanum Memorial Cancer Hospital & Research Centre

5-B, Sector A-2, Phase-5, Hayatabad Peshawar - Pakistan.  
 Phone No. +92-91-5885000 Ext:4563, UAN: 111-155-555, FAX: +92-91-5823815  
 www.shaukalkhanum.org.pk



Patient ID: 230218

Physician Name: Dr Manzoor Khan

Name: MUHAMMAD TAJDAR

Respiratory Therapist: Sohail Ali

Birth Date: 3/30/1990

Age: 33 years

Smoke Status: Quit, lives with smoker

Race: Asian

Gender: Male

Smoke Years: 8

Packs Per Day: 3.00

Height: 70.9 in, 180.0 cm

Pack years: 1.20

Standard: ATS

Weight: 138.6 lbs, 63.0 kg

Study Date: 5/3/2023 10:12 AM

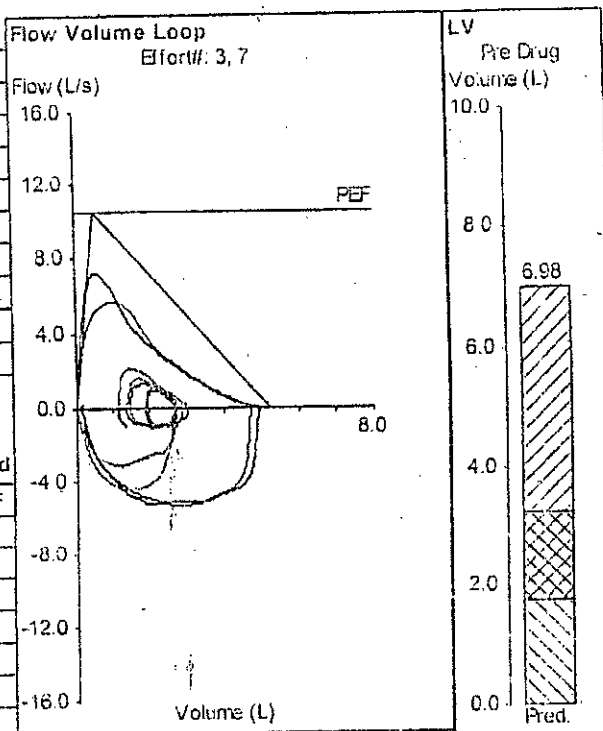
Testing Location: Physiology Lab

## Spirometry:

	Predicted Mean	Pred. Min. (L.L.N.)	Pre Drug	% Predicted	Post Drug	% Predicted	%Change
FVC	5.24	> 4.34	4.94	94	4.71	90	-5
FEV1	4.23	> 3.48	3.39 <	80	3.36 <	79 <	-1
VCmax	5.24	> 4.34	4.94	94	4.94	94	
FEV1/FVC	81	> 72	69 <	84	71 <	88	4
FEV1/VCmax	51	> 72	69 <	84	68 <	84	-1
Peak Flow	10.45	> 8.08	7.23 <	69 <	5.70 <	55 <	-21
FEF25-75%	4.40	> 2.77	2.27 <	52 <	2.55 <	58 <	12
FEF50/FIF50	100	80 - 120	51 <	51 <	55 <	55 <	8
Drug Name					SALBUTAMOL		
Drug Date					5/3/2023		
Drug Time					10:56 AM		
Acceptable Efforts			3		3		
Reproducible Efforts			2		2		
Quality Grade			B		B		

## Nitrogen Washout:

	Predicted	Patient Value	% Predicted
FRC	3.21	3.94	123 >
RV	1.74	2.30	132 >
TLC	6.98	7.00	100
RV/TLC	25	33	132 >
SVC	5.24	4.70	90
IC	3.77	3.06	81
ERV	1.47	1.64	111
FEV1/SVC N2	80.79	72.12	89.27
FVC/SVC N2	100.00	105.25	105.25
Washout Time		0.81	
Duration		86.61	



## Diffusion Capacity:

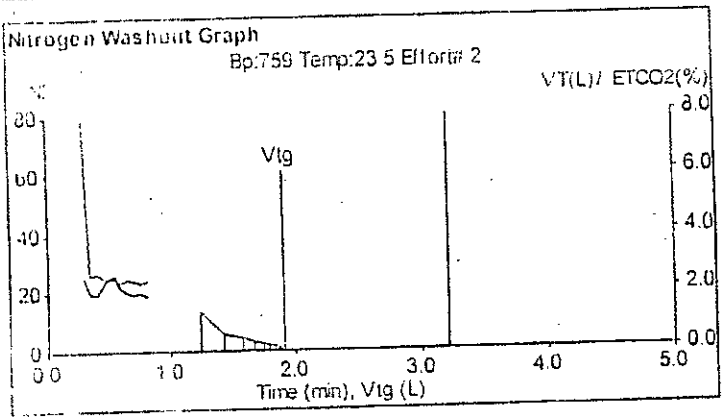
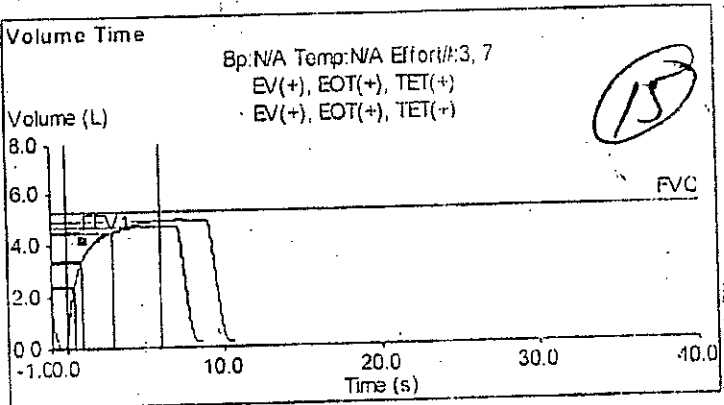
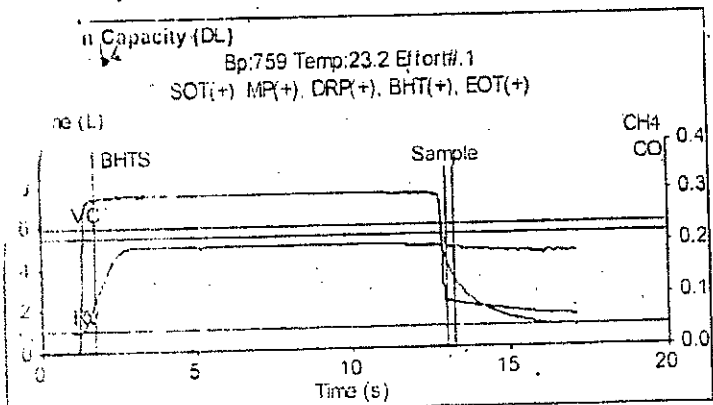
	Predicted	Patient Value	% Predicted
DLCO	37.66	28.66	76 <
DLCO Hb	37.66	30.64	81
VA	6.51	6.02	98
DVA	5.53	4.77	86
DVA Hb	5.53	5.10	92
Hgb		12.50	
Acceptable Efforts		2	
Reproducible Efforts		2	
Quality Grade		B	

## Neuromuscular:

### Maximum Voluntary Ventilation:

	Predicted	Patient Value	% Predicted
MVV	149.78		

	Predicted	Patient Value	% Predicted
MIP	-108.01		
MEP	149.97		



**Interpretation:**

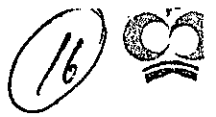
Possible EARLY OBSTRUCTIVE PULMONARY IMPAIRMENT. This is suggested by the reduced FEF25-75 with a normal FVC and FEV1. This finding can be due to a mild degree of a small airway disease and/or the earliest stages of emphysema. This may be reversible in nature, therefore, REPEAT TESTING FOLLOWING BRONCHODILATOR ADMINISTRATION IS RECOMMENDED. The diffusing capacity test results are adjusted to account for the actual hemoglobin present. NORMAL DIFFUSING CAPACITY. This is indicated by the finding of normal values for both the diffusing capacity (DsbHb) and the diffusing capacity in relation to the lung volume (D/VAsbHb).  
 Bronchodilator therapy was administered followed by repeat spirometric testing.  
 Post-bronchodilator testing failed to demonstrate a significant change in FVC, FEV1, or FEF25-75%. This indicates that this patient may not benefit from continued bronchodilator therapy. This interpretation is valid only upon physician review and signature.

**Respiratory Therapist Note:**  
 Patient meet ATS criteria shows good efforts.

**Physician Note:**

# Shaukat Khanum Memorial Cancer Hospital & Research Centre

Plot # 5-B, Sector A-2, Office Enclave, Phase -5, Hayatabad Peshawar. Phone: +92 91 5885000, Fax: 92 91 5823815  
 Email: info@skm.org.pk, Website: www.shaukatkhanum.org.pk



## Invoice

ORIGINAL

<p><b>Patient Name :</b> MUHAMMAD TAJDAR</p> <p><b>Father/Husband Name:</b> SHEHRIYAR</p> <p><b>Donor MRNO Name :</b></p> <p><b>Sex :</b> Male      <b>Age :</b> 33 Year(s)</p> <p><b>Date of Birth :</b> 30-03-1990      <b>NIC.#:</b> 1710163370397</p> <p><b>Address :</b> VILLAGE MANDIZAI, P/O SHABEQADAR Charsadda Pakistan</p> <p><b>Phone Number :</b> 92 0346 5656427</p>	<p><b>Medical Record No. :</b> 000-00230218</p> <p><b>Order # :</b> 23-0527449</p> <p><b>Visit # :</b> 006230025913</p> <p><b>Invoice # :</b> 006230249635</p> <p><b>Invoice Date :</b> 02-MAY-2023 02:06 PM</p> <p><b>In House Doctor :</b> MANZOOR KHAN DR.</p> <p><b>Clinic :</b> MEDICAL ONCOLOGY-DR.MANZO</p>
--	---

Sr.No	CP/FID	Description	Stat	Qty	Actual Price	Stat Charges	Discount	Amount	Report Date	Doctor Name	Be
General	99203	OPD-FIRST VISIT		NO 1	3,600.00			3,600.00		Manzoor Khan Dr.	

**Total Amount** : 3,600.00  
**Financial Support Provided** : 3,600.00

*Handwritten notes:*  
 Echo - 03/11  
 PFT  
 RTC  
 Labs  
 Next Friday  
 05-05-2023 (10AM)  
 12:00 PM

03-05-23  
 10:00 Am  
 PFT

Running Balance Advance: 0

*Handwritten notes:*  
 12-5-23 12-5-23 11:00 am  
 Tentative

*Handwritten notes:*  
 PET = 5-5-23 Fasting from 10:00 am  
 1:30 PM  
 only water

Print date : 02-MAY-2023 02:06 PM	Invoice Trn date : 02-MAY-2023 02:06 PM	Object Code:	S06REP0
User code : 00160000014890	Invoice Trn User : 00160000014890		Page
Terminal : WLSL11R4	Invoice Trn Terminal : SKM1R-0341		

12-05-2023  
 @ 10 AM  
 Tele - Dr - MIC

NOTE: 1. This is a system generated document and does not require any signature/stamp.  
 2. Reports / Refund(s) due, if any, will be processed upon production of this original document.



Invoice

ORIGINAL

17

Name: MUHAMMAD TAJDAR  
 Band Name: SHEHRIYAR  
 (NO)  
 Sex: Male Age: 33 Year(s)  
 Date of Birth: 30-03-1990 NIC.#: 1710163370397  
 Address: VILLAGE MANDIZAI, P/O SHABEQADAR Charsadda  
 Pakistan  
 Phone Number: 92 0346 5556427

Medical Record No.: 000-00230218  
 Order #: 23-0528083  
 Invoice #: 006230250084  
 Invoice Date: 02-MAY-2023 03:30 PM

In House Doctor: MANZOOR KHAN DR  
 Clinic: MEDICAL ONCOLOGY-DR.MANZOOR KHAN DR

Sl No	CPT ID	Description	Stat	Qty	Actual Price	Stat Charges	Discount	Amount	Report Date	Doctor Name	Be
Pathology											
1	80025	CBC + Auto Differential (5 Panels) Includes Hc	NO	1	800.00			800.00	02-05-2023 07:30 PM	Manzoor Khan Dr.	
2	80050	LFT (TP, ALP, ALB, T BILI, ALT, AST, GGT, A/G ratio)	NO	1	2,250.00			2,250.00	02-05-2023 09:30 PM	Manzoor Khan Dr.	
3	80025	Bicarbonate, Electrolytes (Na, K, Cl) Urea Nitrogen, Creatinine	NO	1	2,450.00			2,450.00	02-05-2023 09:30 PM	Manzoor Khan Dr.	
4	80002	Thyroid Profile (T3, T4, TSH)	NO	1	4,200.00			4,200.00	03-05-2023 12:00 PM	Manzoor Khan Dr.	
5	80061	LIPID PROFILE (TRIG, CHOL, LDL, HDL, VLDL)	NO	1	2,950.00			2,950.00	02-05-2023 09:30 PM	Manzoor Khan Dr.	
6	80036	Glycated Hemoglobin (HbA1C)	NO	1	2,700.00			2,700.00	03-05-2023 12:00 PM	Manzoor Khan Dr.	
7	80287	HBSAg	NO	1	2,050.00			2,050.00	03-05-2023 12:00 PM	Manzoor Khan Dr.	
8	80302	Anti HCV	NO	1	3,500.00			3,500.00	03-05-2023 12:00 PM	Manzoor Khan Dr.	
9	80720	Anti HIV	NO	1	3,650.00			3,650.00	03-05-2023 12:00 PM	Manzoor Khan Dr.	
10	80502	Anti Hepatitis B Core Total (IgG and IgM)	NO	1	3,750.00			3,750.00	03-05-2023 12:00 PM	Manzoor Khan Dr.	
11	80311	LDH - SERUM	NO	1	1,050.00			1,050.00	02-05-2023 09:30 PM	Manzoor Khan Dr.	
12	80059	ESR (Erythrocytes Sedimentation Rate)	NO	1	550.00			550.00	02-05-2023 08:30 PM	Manzoor Khan Dr.	
Internal Medicine											
13	93305	Echo-transoracic (TTE) — OSH	NO	1	12,000.00			12,000.00		Manzoor Khan Dr.	
14	94721	PFT Complete Study	NO	1	16,500.00			16,500.00		Manzoor Khan Dr.	
Total Amount								60,400.00			
Financial Support Provided								60,400.00			

3-5-23  
10:00

Running Balance Advance: 0

NOTE: 1. This is a system generated document and does not require any signature/stamp.  
 2. Reports / Return(s) due, if any, will be processed upon production of this original document.

Print date: 02-MAY-2023 03:30 PM Invoice Trn date: 02-MAY-2023 03:30 PM Object Code: S0601 P00071  
 User code: 00160000014890 Invoice Trn User: 00160000014890  
 Terminal: WLSLHR1 Invoice Trn Terminal: SKMP-0069 Page 1 of 1



**CHEMOTHERAPY PROTOCOL SCHEDULE**

MRNO : 00100000230218  
 Name : Muhammad Tajdar  
 Age : 33 Year(s)  
 Sex : Male

Diagnosis : Hodgkin's Lymphoma  
 Protocol : ABVD  
 Plan No. : 1  
 Oncologist : Manzoor Khan Dr.  
 Intent : Curative No. of Cycles : 6

**Inline Orders**

Plan	Diagnosis	Regimen	Cycle No	Day No	Appointment Date	Appointment Duration	Doctor
	Hodgkin's Lymphoma	ABVD	1	1	12-MAY-23 17:50	3 hrs 5 min	Manzoor Khan Dr.
			1	15	26-MAY-23 00:00	3 hrs 15 min	Manzoor Khan Dr.

Regimen Detail: Doxorubicin, Bleomycin, Vinblastine, Dacarbazine

**Other Orders**

Diagnosis	Regimen	Cycle No	Day No	Appointment Date	Appointment Duration	Doctor
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**Oncologist Follow-up Appointments**

Clinic Name	Appointment Date
MEDICAL ONCOLOGY-DR.MANZOOR KHAN (PESH)	02-MAY-2023 14:00:00

**Blood Tests**

CPT

Bicarbonate, Electrolytes (Na, K, Cl), Urea Nitrogen, Creatinine  
 CBC + Auto Differential (5 Parts) Includes Hb  
 LFT (TP, ALP, ALB, T.BILI, ALT, AST, GGT, A/G ratio)  
 Multigated Acquisition (MUGA) rest scan  
 Blood tests to be done 48 hours before your next chemotherapy appointment

180  
 63  
 12-5



## Department of Pathology

### Histopathology Report

Page: 1

VIEW: 11-APR-2023 14:00:27

Dept Ref# : 001HIS23024452  
 MRNO : 001-80004560524  
 Name : MUHAMMAD TAJDAR  
 Age/Sex : 33 Year(s)/Male  
 Phone : 92 0314 9293012  
 Address : peshawr, SHAB-E-QADAR - PAKISTAN

Ordered By :  
 Referring Physician : Waqar Alam Jan-Pes  
 In-house Consultant :  
 Report Destination : Collection Centre - 74  
 Requested : 31-MAR-2023 11:33:52  
 Specimen Received : 01-APR-2023 10:47:31  
 Reported : 07-APR-2023 12:05:23

Specimen Nature: BIOPSY

Specimen Site: CERVICAL LYMPH NODE

History: Fever, cervical lymphadenopathy.

**Gross:** Specimen container is labeled with the patient's name and medical record number. Received in formalin is a single lymph node measures 12 x 10 x 5 mm. Serial slicing reveals gray white firm cut surface. The entire specimen is submitted in a single block.  
 (Gross assisted by: Kulsum Majeed).

**Micro:** Histological examination reveals a lymphoid neoplasm arranged in nodules separated by fibrous septae. There are present scattered large mono and binucleated tumor cells having vesicular nuclei and prominent eosinophilic nucleoli present in an inflammatory background.

Screened By: Faizan Amer Dr.

**IMMUNO/HISTOCHEMICAL STAIN(S):**

CD30: Positive in large cells  
 CD15: Positive in large cells  
 PAX5: Weak positive in large cells  
 CD20: Negative in large cells

*Handwritten:*  
 R. Ali  
 14.4.23  
 [Signature]

**Diagnosis: CERVICAL LYMPH NODE, BIOPSY:**  
 Nodular sclerosis classic Hodgkin lymphoma.

For any query regarding diagnosis, please contact at 03000453078 between 8:00 AM to 5:00 PM (working days only).

SNOMED: T-08000 N-95903

Dr. Asad Hayat Ahmad DR.  
 Consultant Pathologist

SYED MOAZZAM NAQI ABBAS DR.

Electronically verified by, no signature(s) required.

Dr. Asad Hayat Ahmad  
 MRCS, DABP (Histopathology)

Dr. M. Tadiq Mahmood  
 MRCS, DABP (Histopathology)

Dr. Mudassar Hussain  
 MBBS, FRCPS (Histopathology),  
 Fellowship in Renal Pathology  
 (Canada)

Dr. Maryam Hameed  
 MBBS, FRCPath

Dr. Iqbal Hussain  
 MRCS, FRCPath

Dr. Umar Iqbal Shereef  
 MRCS, DABP (Histopathology)



انسپیکٹر جنرل پولیس صوبہ سرحد فارم نمبر 42 گورنمنٹ پولیس پشاور جاب نمبر 19/540 فارم شور۔ تعداد دو ہزار چھتر سو 23 مارچ 2006 رپنی فور (فارم شور جابز) ضمنی فارم (پولیس)

کاؤنٹر فائیل ابتدائی اطلاعی رپورٹ فارم نمبر ۲۳-۵ (ا)

ابتدائی اطلاع نسبت جرم قابل است اندازی پولیس رپورٹ شدہ زبردفعہ 154 مجموعہ ضابطہ فوجداری

تھانہ:- گڑھی کپورہ ضلع:- مردان

علت نمبر:- 451 تاریخ وقت وقوعہ 19-06-22 وقت 18:50 بجے

1	تاریخ وقت رپورٹ:- 19-6-22 وقت 19:20 بجے	چا کیدگی پرچہ 19-6-22 وقت 19:40 بجے
2	نام و سکونت اطلاع دہندہ مستغیث	شیر محمد خان ASI
3	مختصر کیفیت جرم (معد دفعہ) حال اگر کچھ لیا گیا ہو۔	9CKPCNSA برآمدگی 640 گرام چرس
4	جائے وقوعہ فاصلہ تھانہ سے اور سمت:-	ایراب غاڑہ نزد فواد باچہ پٹرول پمپ واقع غیب بانڈہ
5	نام و سکونت ملزم	محمد تاجدار ولد شہر یار ساکن مندر بنی بنگرام، ریشہ زمان ٹیلر ولد نامعلوم سکندہ شاخس پشاور
6	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو	بہ رسیدگی مراسمہ مقدمہ قائم کیا جاتا ہے
7	تھانہ سے روانگی کی تاریخ وقت	بہ سبیل ڈاک

ابتدائی اطلاع نیچے درج کرو۔

اس وقت ایک تحریری مراسمہ مخانب شیر محمد خان ASI بدست کنسٹیبل شاہ حسین 541 موصول ہو کر بہ مضمون ذیل ہے بخدمت جناب ایس ایچ اوصاحب تھانہ گڑھی کپورہ امر دوز میں معہ کنسٹیبلان افتخار شاہ حسین بسلسلہ موبائل گشت جب بہ مقام بجائے وقوعہ بالا پہنچے تو وہاں پر پہلے سے دو موٹرسائیکل برنگ سرخ موجود تھے ایک موٹرسائیکل پر ایک شخص سوار تھا جبکہ دواشخاص دوسرے موبائل کے کھڑے تھے اور ایک دوسرے کیساتھ گفت و شنید میں مصروف تھے جونہی ہم پولیس پارٹی کو دیکھ کر ایک موٹرسائیکل پر دواشخاص سوار ہو کر فرار ہونے میں کامیاب ہو گئے جبکہ دوسرا موٹرسائیکل سوار شخص کو انتہائی حکمت عملی کیساتھ قابو کر کے موٹرسائیکل سے نیچے اتار کر جنگی جامہ تلاشی حسب ضابطہ لی جا کر دوران تلاشی مذکورہ کے انڈر وئیر سے زرد کاشن ٹیپ میں لپٹی ہوئی ایک پیکٹ چرس برآمد ہوئی جسکو بذریعہ ڈیجیٹل سکیل وزن کرنے پر 640 گرام نکلی جبکہ چرس میں سے بذریعہ چاقو 5 گرام علیحدہ کر کے بند بہ پارسل نمبر 1 بغرض تجزیہ FSL پشاور جبکہ بقایا 635 گرام چرس بمعہ انڈر وئیر بند بہ پارسل نمبر 2 میں سر بمبر کر کے شخص حاضرہ نے بدریافت اپنا نام محمد ساجد ولد شہر یار ساکن مندر بنی بنگرام بتلایا جبکو سرسری اغارو گیت کر کے ظاہر کیا کہ میں شیر زمان ٹیلر ولد نامعلوم سکندہ شاخس نزد مدریہ پشاور موبائل نمبر 0314-9077344 کے لئے چرس کا سپلائی مختلف جگہوں پر کرتا ہوں جسکے عوہ کرایہ دیتا ہے مردان میں جس شخص کیلئے چرس لایا تھا اسکا اسم و مسکن مجھے معلوم نہیں صرف موبائل نمبر 0317-6151305 پر اس کے ساتھ رابطہ کر کے جو کہ وقوعہ بالا پر پہنچ گیا پارسل نمبر 1 تا 2 دو موٹرسائیکل نمبری FP2017 برنگ سرخ از قسم یونائیٹڈ انجن نمبر 215497 جسس نمبر U570486493 بطور ثبوت بروئے فرد قبضہ پولیس میں کر کے محمد تاجدار کو مر تکب جرم بالا کا پاکر حسب ضابطہ گرفتار کر کے جبکہ شیر زمان ٹیلر ولد نامعلوم ساکن شاخس پشاور کی گرفتاری درپیش رکھ کر جبکہ تفتیشی سٹاف موبائل نمبر 5 کے متعلق دوران تفتیش معلومات اور پتہ براری کرے گی مراسمہ بغرض قائمی مقدمہ تھانہ گڑھی کپورہ کارروائی تھانہ پس آمدہ مراسمہ حرف بحرف درج صدر ہو کر پرچہ مجرم مقدمہ پرچہ ہو کر نقول FIR بمعہ مراسمہ بمراء تفتیش حوالہ انچارج شعبہ تفتیش کئے جاتے ہیں پرچہ گزارش ہے۔

دستخط انگریزی



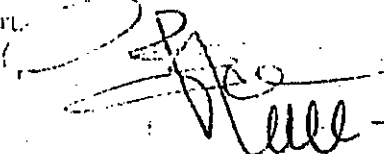
ORDER

B(21)

As reported by Superintendent of Police, HQrs: City Traffic Police, Peshawar vide his office Order Endst: No. 528-32 / PA, dated 21.06.2022, that Constable Tajdar No. 1788 of FRP HQrs: Peshawar is involved in Case F.I.R No. 451, dated 21.06.2022 U/S 9C-CNSA, Police Station Garhi Kapoora District Mardan.

Therefore he is hereby placed under suspension with immediate effect.

Reserve Inspector, FRP HQrs, Peshawar is nominated as Inquiry Officer to conduct proper departmental Inquiry and report.

  
(JEHANZEB KHAN BARKI) PSP  
Deputy Commandant,  
Frontier Reserve Police,  
Khyber Pakhtunkhwa, Peshawar.

No. 1046/49 PA, dated Peshawar the 23/06/2022.

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

1. Superintendent of Police, HQrs: City Traffic Police Peshawar with reference to his office Order Endst: No. quoted above.
2. R.I. F.R.P, HQrs: Peshawar (Charge Sheet and Statement of allegations is enclosed).
3. SRC / CAST FRP HQRS

Page 1 of 2  
**IN THE COURT OF ADDITIONAL SESSIONS**  
**JUDGE-III, MARDAN**

Muhammad Tajdar vs The state  
Case No.124/BA of 2022

27/6/22 — 19000



Order.2  
22.06.2022

1. **Present:** Counsel for the accused-petitioner, APP for the state.
2. Arguments heard and record perused.
3. Through the instant petition, the accused-petitioner namely Muhammad Tajdar s/o Shehriyar r/o village Mandeze Tehsil Shabqadar District Charsadda seeks his release on bail in case FIR No.451 dated 09.06.2022 registered under section 9-C KPCNSA of PS Garhi Kapura, Mardan.
4. As per record, the accused-petitioner have been booked in the case for offence u/s 9-C KPCNSA on the basis of recovery of 640 grams charas from his possession who reportedly disclosed that he used to sell the contraband for co-accused Sher Zaman Tailor s/o unknown.
5. Learned counsel for the accused-petitioner, while arguing his case, contended that nothing incriminating has been recovered from him but has been booked by the local police for ulterior motive, no independent private witness has been associated with the alleged recovery despite the allegation of recovery at the given spot, no FSL report is there, so, it is yet to be seen that the recovered material are contraband or something else, no confession has been made by the accused/petitioner, thus, requested for his release on bail.
6. Conversely, learned APP for the state argued that the accused-petitioner has been charged directly by name in the FIR, the recovery has been affected from his direct personal possession, the case of the accused-petitioner is hit by the restrictive clause of section 497 Cr.P.C, thus, not entitled to the concession of bail.
7. From available record, when perused in the light of arguments advanced by learned counsel on both sides, it is tentatively observed that the search and seizing police officer is

Certified To Be True Copy

27 JUL 2022

Examiner Copying Branch  
Court Mardan

4070  
22

*[Handwritten signature]*

22-06-2022

24

**IN THE COURT OF ADDITIONAL SESSIONS**  
**JUDGE-III, MARDAN**

Muhammad Tajdar vs The state  
Case No.124/BA of 2022


4

an ASI with nothing on record about any authorization by authorized officer/RPO for such search and seizure. Then, FSL report about the recovered substance has yet not been placed on file, therefore, it is yet to be seen as to whether the recovered substances were charas or otherwise. Besides, no any independent private person-witness has been associated with the shown search and seizure despite the place of occurrence being a public place and it being a day light occurrence. The accused/petitioner has neither confessed his guilt nor made any pointation, thus, case of the accused-petitioner is one of further inquiry. Nothing is there on record about previous involvement in such offence. Investigation in the case is complete and accused-petitioner is no more required to be kept in custody for further investigation.

8. Consequently, this bail petition is allowed and the accused-petitioner is admitted to bail subject to furnishing bail bonds in the sum of Rs.80,000/- with two sureties each in the like amount to the satisfaction of this Court. The sureties must be local, reliable, men of means and reputation.

9. Requisitioned record along with a copy of this order be sent back to the quarter concerned while file of this Court be consigned to the record room after necessary completion and compilation.

Announced  
22.06.2022

  
(Ubaidullah)  
Additional Sessions Judge-III,  
Mardan

22/06/2022  
Additional Sessions Judge-III

Name of Application: محمد تاجدار  
No of Application: 10934  
Date of presentation of application: 25/6/22  
Date of preparation of copies: 21/7/22  
Number of Pages: 03  
Court Fees: \_\_\_\_\_  
Urgent Fees: 1200  
Signed of copyist/Examiner: [Signature]  
Date of Delivery: 23/7/22

**Certified To Be True Copy**

2 JUL 2022

Examiner Copying Branch  
Session Court Mardan

**CHARGE SHEET**

1. WHEREAS I am satisfied that a formal enquiry as contemplated by Police Rules 1975 is necessary and expedient.

2. AND whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in Rule-3 of the aforesaid Rules.

3. Now therefore, as required by Rule 6 (1) (a) & (b) of the said Rules, I, **Rahim Hussain**, Superintendent of Police HQrs, City Traffic Police, Peshawar do hereby charge you **Constable Tajdar Belt No. 1788** under Rules 5 (4) of the Police Rules 1975 on the basis of following allegations:-

- i. As reported vide DD No. 29, dated 19.06.2022 by MASI CTP, that you have been arrested with narcotics weighing 635 Grams vide FIR No. 451, dated 19.06.2022 u/s 9C-CNSA by local Police of PS Garhi Kapoora, District Mardan.
- ii. By doing this you have committed gross misconduct and liable to be proceeded against departmentally.

4. AND I do hereby direct you further under Rule 6 (I) (b) of the said Rules to put-in written defence within 07-days of the receipt of this Charge Sheet as to why the proposed action should not be taken against you and also state whether you desire to be heard in person or not?

5. AND in case your reply is not received within the stipulated period to the enquiry officer, it shall be presumed that you have no defense to offer and in that case, an ex-parte action will be taken against you.

(**RAHIM HUSSAIN**)

Superintendent of Police, HQrs  
City Traffic Police, Peshawar

No: 551-53 /PA,  
Dated 22/06/2022

Copies to the:-

1. W/Chief Traffic Officer, Peshawar for favour of information please.
2. Enquiry Officer to initiate departmental proceedings against the defaulter official under Police Rules 1975.
3. Constable Tajdar Hussain Belt No. 1788 (defaulter Officer) to appear before the E.O. and attend the departmental proceedings as and when directed/called by the Enquiry Officer.

DISCIPLINARY ACTION

I, **Rahim Hussain**, Superintendent of Police HQrs, City Traffic Police, Peshawar as competent authority, am of the opinion that **Constable Tajdar Belt No. 1788/FRP** has rendered himself liable to be proceeded against, as he committed the following acts/omission within the meaning of section 03 of KP Police Rules 1975.

SUMMARY OF ALLEGATIONS

1. As reported vide DD No. 29, dated 19.06.2022 by MASI CTP, Constable Tajdar Belt No. 1788/FRP has been arrested with narcotics weighing 635 Grams, vide FIR No. 451, dated 19.06.2022 u/s 9C-CNSA by local Police of PS Garhi Kapoora, District Mardan.
2. For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, **DSP Legal, Habib Khan CTP** is appointed as Enquiry Officer.
2. The enquiry officer shall in accordance with the provisions of the KP Police Rules 1975 provide reasonable opportunity of hearing to the accused officer/official and make recommendations as to punishment or any other appropriate action against the accused.

  
(**RAHIM HUSSAIN**)  
Superintendent of Police, HQrs  
City Traffic Police, Peshawar

۱۱

حوا = جامع شیط و آری SP طرز مذی 531-532 درخ 06/22 معرفت  
تھوں تم :-

سائل کیفیت بجا ڈلتیں کرمیں میں کسبائے عو۔ اور ذرا نص خوش اولاد  
کسبائے انما آ رہا عو۔ اور ناظر امدن باہ کسبائے عو کی ایام دو باب سکانت  
نہیں رہے۔

خانیالی۔ درخ 06/22 19 کر مشق ام کی بیماری پسی سے مسئلہ میں میں سائل کو  
مجھ کو جب پانڈہ طرہا تھا۔ آراتے میں دیکھ پیدل شخص نے کئی راتے کا اسارہ  
گنٹ ہائی۔ میں سائل نے مذکرہ کو گنٹ فراغ کی اور روزانہ عوا۔ کچھ دیر بعد  
پانڈہ روڈ لہر لب غازی روڈ پر کھڑا تھا کی نام پندہ طرہا تھی۔ بہت سا کھڑ  
شخص نے کئی اور منزل پہنچنے کی بات کی۔ لہذا میں نام پندہ سے عو  
عام پر مشورہ کیا کہ مذکرہ شخص کی درخواست پر روٹی۔ مذکرہ کی روٹی سا  
سے اترنے ہی لہر پوسٹ پارٹی کو دیکھتے ہیں دوڑنا شروع کی۔ کچھ سمجھ  
تھی کہ اور حق رون گوارا ہوا۔ اہم اہم ان درست آئیے اور عو اور بار  
تے نزدیک آنا۔ مذکورہ سے پہلے عو نے شری کو پتھر کی کمر قمار کی  
گنتن وہ پتھر دریا کا ماندہ اٹھا کر نذر کھڑے میں لا سا۔ کچھ  
کو کئی پارٹی ناظم نے پر 540 عرفان اللہ سے قرب آنا۔ اور کچھ کمر قمار  
کیا۔ گنتن میں 540 کو کھڑے کچھ سے معاملہ کی بابت اور انسا لعارف  
اور جب پانڈہ غازی آنا آتے کی بابت عو کی گنتن مذکرہ نے کیا۔ کچھ  
شخص نے کچھ ساتھی لہر ہم منشیات لاکھا کرنا سے میں نے گنتن دیکھی  
بابت ہیبت کی۔ گنتن مذکرہ نہ مانا اور پتھر کھڑے کچھ عو کی بابت میں نے  
دفع کرنا اور پتھر لٹا مذکرہ سے مل گیا۔ جو بائیں کھاتے کی گنا

Pto

F (28)

**FINAL SHOW CAUSE NOTICE UNDER THE KHYBER PAKHTUNKIWA**

**POLICE RULES 1975, AMENDED 2014.**

I. Jehan Zeb Khan Barki, PSP Deputy Commandant FRP Khyber Pakhtunkhwa being competent authority do hereby serve this Final Show Cause Notice to you Constable Tajdar No. 1788 of FRP / FRP HQrs: Peshawar.

(1) i. That, as reported by Superintendent of Police, HQrs: City Traffic Police, Peshawar vide his office Order Endst: No. 528-32 / PA, dated 21.06.2022, that Constable Tajdar No. 1788 of FRP HQrs: Peshawar is involved in Case F.I.R No. 451, dated 21.06.2022, U/S 9C-CNSA, Police Station Garhi Kapoora District Mardan. Besides, you also absconded yourself w.e.f 02.07.2022. In this connection an inquiry was entrusted to R.I, F.R.P, HQrs: Peshawar.

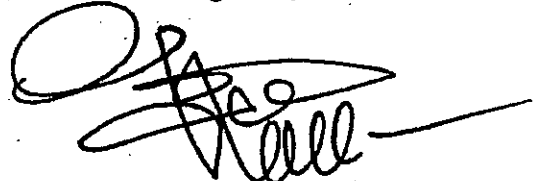
ii. That consequent upon the completion of inquiry conducted against you by R.I, F.R.P. HQrs: Peshawar for which you were given full opportunity of hearing but your reply to the Charge Sheet / statement of allegation was found unsatisfactory, hence the I.O recommended you for suitable punishment.

iii. On going through the findings / recommendations of the Inquiry Officer as well as other material available on record and other connected papers, I am satisfied that you have committed the above acts / omissions which is against the Khyber Pakhtunkhwa Police Rules 1975, amended 2014.

(2) Therefore, I Jehan Zeb Khan Barki, PSP Deputy Commandant, FRP, Khyber Pakhtunkhwa being competent authority have tentatively decided to impose upon you Major / Minor penalty including dismissal from service under the said Rules.

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

(4) If no reply to this Final Show Cause Notice is received within (07) seven days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and consequently ex-parte action shall be taken against you.



(JEHANZEB KHAN BARKI) PSP  
Deputy Commandant,  
Frontier Reserve Police,  
Khyber Pakhtunkhwa, Peshawar.

No 1125 /PA, dated 07 07 /2022.





AP (30)

**ORDER**

This order will dispose of the Departmental Inquiry initiated against Constable Tajdar No. 1788 of FRP HQrs Peshawar on the following grounds

Brief facts of the case are that Constable Tajdar No. 1788 of FRP HQrs Peshawar (presently transferred to City Traffic Police, Peshawar on loan basis) was involved in Case FIR No. 451, dated 21.06.2022 U/S 9C-CNSA, Police Station Garhi Kapnoora District Mardan

In this regard proper departmental inquiry was initiated against him. He was issued Charge Sheet. Statement of allegations and R.I. FRP HQrs Peshawar was nominated as Inquiry Officer. The IO after conducting proper departmental inquiry submitted his findings wherein recommended for taking ex-parte action against the delinquent official

Upon findings of Inquiry Officer, he was issued Final Show Cause Notice to which he submitted reply which was found unsatisfactory. Then he was given full opportunity of personal hearing in Orderly Room on 26.07.2022 but he could not provide any cogent reason regarding FIR against him.

Being a member of disciplined force, he is liable to take necessary measures to stop such illegal practices in the best interest of public/department. Nevertheless his involvement in the aforementioned criminal cases, there is no hope from him to become a good Police official in future

Keeping in view the recommendations of the Inquiry Officer and other available record, it has come crystal clear that the defaulter official i.e. constable Tajdar No. 1788 is involved in the above said criminal case

Therefore in exercise of powers conferred upon me under the Khyber Pakhtunkhwa Police Rules 1975, amended 2014, I, Jehan Zeb Khan Barki PSP, Deputy Commandant FRP, Khyber Pakhtunkhwa Peshawar being competent authority have tentatively decided to award Major punishment of Removal from Service to Constable Tajdar No. 1788 of FRP, HQrs Peshawar with immediate effect. However, his absence as well as intervening period is treated as leave without pay

**Order Announced.**

(JEHANZEB KHAN BARKI) PSP  
Deputy Commandant,  
Frontier Reserve Police,  
Khyber Pakhtunkhwa, Peshawar

No. 1935-40 /PA dated Peshawar, the 27 / 07 / 2022

Copy of above is forwarded.

**For information to the:-**

Worthy Commandant, FRP Khyber Pakhtunkhwa Peshawar.

**For necessary action to the:-**

1. Superintendent of Police, HQrs: City Traffic Police, Peshawar w/r to his office  
Order Indst: No. 528-32 / PA, dated 21.06.2022.

**ORDER**

This order will dispose of the departmental inquiry initiated against constable Tajdar No.1788 FRP HQrs Peshawar on the following grounds

Brief facts of the case are that Constable Tajdar No.1788 of FRP HQrs Peshawar presently transferred to City Traffic Police, Peshawar on loan basis) was involved in case FIR No.451, dated 21.06.2022 U/S 9C-CNSA Police Station Garhi Kapoora District Mardan.

In this regard proper departmental inquiry was initiated against him. He was issued charge sheet Statement of allegations and R.I.I.R.P HQrs Peshawar was nominated as Inquiry Officer. The I.O after conducting proper departmental inquiry submitted his findings wherein recommended for taking ex-parte action against the delinquent official.

Upon findings of inquiry officer. He was issued Final Show cause notice to which he submitted reply which was found unsatisfactory. Then he was given full opportunity of personal hearing in Orderly Room on 26.07.2022 but he could not provide any cogent reason regarding FIR against him.

Being a member of disciplined force, he is liable to take necessary measures to stop such illegal practices in the best interest of public/department. Nevertheless his involvement in the aforementioned criminal cases, there is no hope from his to become a good police official in future.

Keeping in view the recommendations of the Inquiry Officer and other available record, it has come crystal clear that the defaulter official i.e. constable Tajdar No.1788 is involved in the above said criminal case.

Therefore in exercise of powers conferred upon me under the Khyber Pakhtunkhwa Police rules 1975, amended 2014, I, Jehan Zeb Khan Barki PSP, Deputy Commandant L.R.P, Khyber Pakhtunkhwa Peshawar being competent authority have tentatively decided to award Major Punishment of Removal from Service to constable Tajdar No.1788 of P.R.P HQrs Peshawar with immediate effect, However, his absence as well as intervening period is treated as leave without pay.

Order announced

Sd/-  
**(Jehanzeb Khan Barki) PSP**  
Deputy Commandant  
Frontier Reserve Police,  
Khyber Pakhtunkhwa, Peshawar

No.       /235-40       /PA dated Peshawar, the 27/07/2022

Copy of above is forwarded

**For information to the:-**

Worthy Commandant, FRP Khyber Pakhtunkhwa Peshawar

**For necessary action to the:-**

1. Superintendent of Police, HQrs, City Traffic Police, Peshawar w/r to his office  
Order Endst. No.528-32/PA, dated 21.06.2022

بہار صاحب FRP ضییر جنو قخواہ پشاور

درخواست بھرا چالی سروس درخواست برخلاف حکم خصوصاً 27 جولائی 2022

جناب عالی!

گزشتہ سال 2009ء کا پھرتی شدہ ہے اور اپنی ڈیوٹی فوش اسلوب سے انجام دے رہا تھا کہ دوران ڈیوٹی اپنی دن سائل اپنی ڈیوٹی کی انجام دی لیا کہ گھر خود سے بسواری موٹر سائیکل آ رہا تھا کہ راستے میں اپنی بندہ نے اشارہ دے کر لف فانگ سائل نے نہیں بیٹھا کی بناء پر موٹر سائیکل خود پر بٹھایا کہ راستے میں ٹھوٹا آگے جا کر ناکہ بندی پر پولیس نے میری موٹر سائیکل پھری کر دی تو شخص مذکورہ اچانک بھاگ کر فرار ہوا پولیس تقری شخص مذکورہ کے پیچھے بھاگ کر چوٹی واپس آئی تو سائل ناکہ بندی پر کھڑا تھا کہ پولیس پارٹی نے سائل کو بولا کہ وہ اجنبی شخص بھاگ گیا لیکن اس سے چرسا پیرامہ ہوئی ہے اور وہ شخص ایک سائل ہے۔ لہذا سائل پر نہ جائے آجائے آدھا کلو چرسا پیرامہ گی کی اینٹا اٹار تھا کہ پھری کہوہ میں درج کی گئی۔ سائل کا شخص مذکورہ سے نہ کوئی تعلق یا رشتہ تھا اور نہ ہی اسکو جاننا تھا لیکن صرف نیلی کی بناء پر راستے میں لف دی اور مذکورہ پولیس پارٹی نے پریشانی سے سائل کے خلاف دیسٹنٹ ٹھرت FIR درج کرائی

سائل اپنی غریب خاندان سے تعلق رکھتا ہے تو کوری کے علاوہ دیگر کوئی عا شا نہیں۔ سائل کو اپنی من گھرت FIR میں بہ نیلی کی وجوہات میں ملوث کرایا گیا۔ سائل بیٹا معذور ہیں چھ بیویوں کی کفالت کا واحد کفیل ہے اور FIR میں سائل نے قصور ہے۔ سائل پولیس خورس میں بیوٹے بیوٹے ایسے غیر قانونی اور غیر اخلاقی فعل کا تصور بھی نہیں کر سکتا اور نہ سائل نے خاندان میں اس قسم کے حرکت کرنے کی اجازت ہے اور نہ اچھی تک کسی نے اس قسم کا فعل کیا ہے۔

لہذا آپ صاحبان سے استدعا ہے کہ سائل کی درج بالا لاچاری مفلسی کو مدنظر رکھ کر بیوٹے اور سائل کی بے گناہی کو سامنے رکھ کر سائل کو دوبارہ مجال کرنے کے احکامات صادر فرما کر مستور فرمائیں۔ سائل بے گناہ ہے اور عدالت نے سائل کو ضمانت پر رہا کیا ہے۔ ضمانت نامہ ہمراہ درخواست لف ہے۔

عینہ نواز شہری

العارض

ایک نالیہ الگم سابقہ کنسٹیبل تاجدار نمبر 1788 FRP/ACMS پشاور

J  
32

**ORDER**

This order will dispose of the departmental appeal preferred by Ex-constable Muhammad Tajdar No. 1788 of FRP HQrs; against the order of Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar issued vide Order Endst; No. 1235-40/PA, dated 27.07.2022, wherein he was awarded major punishment of removal from service.

Brief facts of the are that the applicant was proceeded against on the allegations that he was transferred and posted to City Traffic Police, Peshawar on loan basis, involved himself in criminal case vide FIR No. 451, dated 21.06.2022 U/S 9-CNSA, Police Station Garhi Kapoora, District Mardan.

In this regard, departmental enquiry was initiated against him as he was issued Charge sheet alongwith Statement of Allegations and RI FRP HQrs; Peshawar was nominated as Enquiry Officer to conduct proper enquiry against him. After completion of enquiry, the Enquiry Officer submitted his findings, wherein the accused constable was found guilty of the charges leveled against him and recommended for taking ex-parte action against him.

Upon the findings of Enquiry Officer, he was issued Final Show Cause Notice, to which he replied, but his reply was found unsatisfactory. He was also given full opportunity of personal hearing in orderly room on 26.07.2022 but he could not provide any cogent reason regarding his innocence.

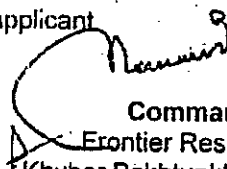
Keeping in view the above narrated facts and other material available on record, he was awarded major punishment of removal from service vide Order Endst; No. 1235-40/PA, dated 27.07.2022.

Feeling aggrieved against the impugned order of Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 18.08.2022.

During the course of personal hearing, the applicant failed to present any justification regarding to his innocence. From perusal of enquiry file it has been found that the allegations leveled against the applicant were fully established by the Enquiry Officer during the course of enquiry. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force. Furthermore, the applicant being a member a discipline force involved himself in a moral turpitude nature offence therefore; any leniency or complacency would further embolden the accused officer and impinge upon adversely on the overall discipline and conduct of the force. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

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

Order Announced in the presence of applicant



Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar.

No 697-700 IPA, dated Peshawar the 23 108 /2022.

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

1. Deputy Commandant FRP, KP, Peshawar.
2. SRC/Incharge Fauji Missal FRP HQrs; Peshawar. His Service record alongwith D-file sent herewith.
3. Ex-constable Tajdar No. 1788 FRP HQrs; S/o Shahryar R/o Village Mandezai, Police Station Shabqadar, District Charsadda.

محکم دلائل سے مزین و متنوع ومنفرد موضوعات پر مشتمل مفت آن لائن مکتبہ

درخواست جناب G.P اما خیر بختون جو اہل شہار اور

جناب عالی! گزارش ہے کہ سال 2007ء کا بھرتی شدہ ہے اور اپنی ڈپوٹی خوش اسلوبی سے انجام دے رہا تھا کہ دوران ڈپوٹی ایک سال سے اس ڈپوٹی کی انجام دہی کیلئے کمر خرد سے بسواری نوٹس سائل آ رہا تھا کہ راستے میں ایک بندے اشارہ کے کر لفت والا سائل نے تلبہ بندی بنی نوٹس سائل خود پر بٹھایا کہ راستے میں ٹھوڑا آئے جا کر نا کہ بندی پر پولیس نے سری نوٹس سائل کٹری کر دی۔ تو شخص مذکورہ اجانب بھاگتے فرار ہوا۔ پولیس نے شخص مذکورہ سے پچھنے بھاگتے جو نہیں داپس آئی تو سائل نا کہ بندی پر کٹراؤنا کہ پولیس پارٹی نے سائل کو بلا کہ وہ اجنبی شخص بھاگ گیا لیکن اس سے جس پر اس سائل ہے اور وہ شخص آ رہا تھا ہے۔ لہذا سائل پر نہ جانے انجام دے کھو جس پر اس کی F.I.R. تھوڑا کر ہی کیوڑہ میں درج کی گئی۔ سائل کا شخص مذکورہ سے نہ کر کے لگائی یا رشہ تھوڑا اور نہ ہی اس کو جاننا تھا کہ پولیس نے صرف پولیس کی بنا پر راستے میں لفت دی اور مذکورہ پولیس پارٹی نے ہر قسم سے سائل کے خلاف ایک ہی گھڑت F.I.R. درج کرائی۔ سائل کو کسی بھی انکوائری کا علم نہیں ہے نہ انکوائری آفسر نے سائل کو باہر اطلاع کیا ہے اور نہ دوران انکوائری سائل کو صفائی اور جرح کا موقع دیا گیا ہے۔ از روئے قانون متعلقہ حکام کی ہر ذمہ داری تھی کہ دوران انکوائری تمام لوازمات پوری کریں اور فائل مشوکاز سے ساتھ سائل کو انکوائری پر لپٹ بھی بھیجا کریں۔ لہذا تمام کارروائی کے طرفہ طور پر ہوئی ہے جو کہ قانون نظر میں اس کی کوئی اہمیت نہیں ہے۔

سائل ایک غیر سب خانہ سے تعلق رکھتا ہے۔ نوکری کے علاوہ دیگر کوئی ذلیف عیاشی نہیں ہے۔ سائل کو ایک گھڑت F.I.R. میں برصغیر کی وجہ سے ملوث کرایا گیا۔ سائل تین روزہ رہیں۔ بھائیوں کی کفالت کا دھار کفیل ہے اور F.I.R. میں سائل کے دھور ہے۔ سائل پولیس سروس میں ہوتے ہوئے ایسے غیر قانونی اور غیر اخلاقی فعل کا تصور بھی نہیں کر سکتا اور سائل کے قانون میں اس قسم کے حرکت کرنے کی اجازت ہے۔ اور انہیں نہ کسی قسم کا سائل کیا ہے۔

لہذا آپ صاحبان کی خدمت اقدس میں استدعا ہے کہ سائل کی وجہ بالا مذکورہ، اجاری عدالتی اور بے گناہی کو مد نظر رکھتے ہوئے دوبارہ بحالی سروس کے احکامات صادر فرمائیں۔ سائل تازہ لیت دعا کر رہا ہے۔ سائل بے گناہ ہے اور عدالت نے ضمانت پر رہا کیا ہے۔ ضمانت نامہ درخواست کیساتھ منسلک ہے۔

العاصم  
آپ کا تابع فرمان سالتہ کنسٹیبل محمد ناصر عمر 1788 F-RP/HQ پشاور۔

35

**VAKALAT NAMA**

NO. \_\_\_\_\_/2023

IN THE COURT OF SP Service Tribunal, Peshawar

Muhammad Tajdar

(Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Police Department

(Respondent)  
(Defendant)

I/We, Muhammad Tajdar

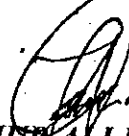
Do hereby appoint and constitute **TAIMUR ALI KHAN, ADVOCATE HIGH COURT**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated \_\_\_\_\_/2023

M. Tajdar  
(CLIENT)

**ACCEPTED**



**TAIMUR ALI KHAN**  
Advocate High Court

**BC-10-4240**  
**CNIC: 17101-7395544-5**  
**Cell No. 03339390916**