

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

BEFORE: **KALIM ARSHAD KHAN** ... **CHAIRMAN**
RASHIDA BANO ... **MEMBER (Judicial)**

Service Appeal No.5199/2021

Date of presentation of Appeal.....28.04.2021
Date of Hearing.....06.07.2023
Date of Decision.....06.07.2023

Mr. Shah Dawlazz Khan son of Umar Khan Constable Belt No.1736
Khyber Pakhtunkhwa Police District Bannu R/O Jehangir, P.O Torka
Bazar, Lalozai, Tehsil and District Bannu.....*Appellant*

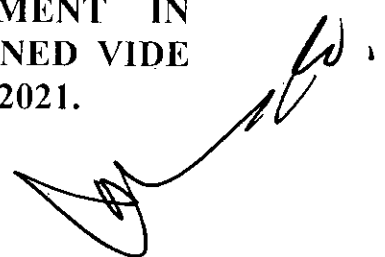
Versus

1. **Inspector General of Police**, Khyber Pakhtunkhwa, Peshawar.
2. **Regional Police Officer**, Bannu.
3. **District Police Officer**, Bannu.....(*Respondents*)

Present:

Miss. Naila Jan, Advocate.....For appellant
Mr. Asad Ali Khan, Assistant Advocate General.....For respondents

APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974,
AGAINST THE IMPUGNED ORIGINAL ORDER
NO.13573-79/SRC DATED 11.08.2016 AGAINST
WHICH DEPARTMENTAL APPEAL DATED
18.08.2016 WAS FILED BEFORE RESPONDENT NO.2
WHICH WAS DECLINED AT A BELATED STAGE
VIDE IMPUGNED FINAL ORDER DATED 08.04.2021
AGAINST WHICH THE INSTANT SERVICE FILES
WITHIN STIPULATED PERIOD OF 30 DAYS,
HENCE THE APPEAL IS WITHIN TIME. IT IS ALSO
PERTINENT TO MENTION THAT THE APPELANT
ALSO FILED MERCY PETITION BEFORE
REPSONDENTNO.1 FOR REINSTATEMENT IN
SERVICE BUT THE SAME WAS DECLINED VIDE
IMPUGNED FINAL ORDER DATED 08.04.2021.



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JUDGMENT

KALIM ARSHAD KHAN CHAIRMAN: The appellant's case in brief is that he was appointed as Constable on 09.06.2017 in the Police Department. During service, he fell ill and was accordingly admitted in Hospital. He requested the respondents for medical leave which factum was endorsed by Naqalmad/Daily Diary No.84 dated 13.05.2016 but no formal order was passed on the application filed by the appellant and subsequently, ex-parte proceedings were initiated against the appellant on the charges of absence. Consequently, the appellant was dismissed from service vide order dated 11.08.2016. Feeling aggrieved, the appellant filed departmental appeal on 18.08.2016, the appellant also filed mercy petition for his reinstatement but none of his pleas were accepted. Hence, the present service appeal.

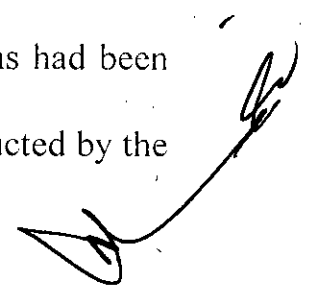
2. On receipt of the appeal and its admission to full hearing, the respondents were summoned, who put appearance and contested the appeal by filing written reply raising therein numerous legal and factual objections. The defense setup was a total denial of the claim of the appellant.

3. We have heard learned counsel for the appellant and learned Assistant Advocate General for the respondents.

4. Learned counsel for the appellant submitted that the impugned orders were against law, facts and material available on record, hence, not tenable; that the respondent No.2 had passed the impugned original order with retrospective effect which is *void ab-initio* hence, no limitation ran against a void order; that the respondents initiated ex-parte proceedings

against the appellant on the charges of absence from duty without complying with the provisions of Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, hence, the impugned order was not sustainable. She submitted that the respondents had violated Article-10 of the Constitution of Islamic Republic of Pakistan, 1973 by not giving proper opportunity of defense to the appellant; that no regular inquiry had been conducted against the appellant to establish the charge of absence from duty w.e.f 13.05.2016. Further submitted that the impugned orders were also violative of Section 24-A of General Clauses Act as the competent authority and the appellate authority had failed to pass a speaking order with reasons and even no show cause notice had issued to the appellant; that no statement of allegations or any charges sheet had been communicated to the appellant which was mandatory. She concluded that no opportunity of personal hearing had been afforded to the appellant and the same was violation of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011. Reliance was placed on 2005 PLC (CS) 1095 Supreme Court; PLD 2003 SC 724 & 2000 SCMR 1743.

5. Conversely, learned Assistant Advocate General submitted that the orders issued by the respondents were quite legal, based on facts, justice and in accordance with law; that the appellant had willfully absented from duty as well as from inquiry proceedings and after establishing the charges, the punishment was awarded which was in accordance with law. He submitted that proper charge sheet with statement of allegations had been issued to the appellant and departmental inquiry had been conducted by the



DSP, several notices had been issued but the appellant had failed to response. He concluded that all the opportunities of defense/hearing had been provided to the appellant but he had failed to avail the same, therefore, he requested for dismissal of the instant service appeal.

6. Vide the impugned order dated 10.08.2016, the appellant was dismissed from service because of his absence from 13.05.2016. The dismissal was made on the basis of an inquiry conducted by DSP Cantt. Mr. Zahir Shah and according to the inquiry report, the appellant was summoned through various notices but he did not report back to his duty; that Moharrir, Police Lines was summoned, who had explained in his statement that the appellant was absent and the absence was recorded in daily diary No.84 dated 13.05.2016. The Inquiry Officer recommended that the appellant might be awarded appropriate punishment. The contention of the appellant is that he fell ill which fact was duly recorded in daily diary No.22 dated 12.05.2016. That he submitted applications for grant of four months medical leave. Copies of two applications of the appellant, one of 13.05.2016 and the other is of 26.05.2016, duly attested by the learned counsel, are placed on file. There is voluminous medical record comprising of prescription chits, laboratory reports, ultrasounds etc. All are showing the same and similar ailment of the appellant and regular and continuous medical treatment of the appellant. None of the above medical documents were denied or doubted nor verified by the respondents, rather the ailment of the appellant is admitted vide daily diary Nos.22 & 33 dated 12.05.2016 and 84 of 13.05.2016. The respondents, however, deny submission of applications for grant of medical leave in the

reply. The reply is supported by an affidavit of Mr. Muhammad Farooq Khan, DSP, who was, though, authorized by the respondents to appear on behalf of the respondents and to submit and sign all documents yet he was not authorized to swear in any affidavit or to make any statement, therefore, the affidavit sworn in by Mr. Farooq Khan, DSP cannot be considered while that of the appellant would be given preference in support of non- submission of applications for seeking leave on medical ground. As against that the affidavit annexed with the appeal given by the appellant regarding all the averments including his making two applications for grant of medical leave would be considered. Leave on medical grounds cannot be refused to a Civil Servant. In this respect, reference is made to Rule-13 of the Khyber Pakhtunkhwa Civil Servants Revised Rules, 1981 which is reproduced as under:

"13. Leave on Medical Certificate.---*Leave applied for on medical certificate shall not be refused. The authority competent to sanction leave may, however, at its discretion, secure a second medical opinion by requesting the Civil Surgeon or the Medical Board to have the applicant medically examined. The existing provisions contained in Supplementary Rules 212, 213 and Rule 220 to 231 for the grant of leave on medical grounds will continue to apply."*

The medical prescriptions/documents are not disputed, rather admitted by the respondents and the main reason was his illness due to which he remained absent from duty. His absence is thus justified having been plausibly and through undisputed medical documentary evidence, explained and proved. As the ailment of the appellant was not at all disputed nor denied rather admitted there remained no need to conduct any enquiry into the factum of ailment. As aforesaid, the authority could not refuse leave sought on medical ground under rule 13 of the Revised Leave Rules, 1981, the applications submitted

by the appellant or for that matter the prescriptions and laboratory test reports ought to have been considered when the authority intended to proceed against the appellant. Grant of leave on medical grounds is not a discretion rather a sort of right of a civil servant under rule 13. The Supreme Court of Pakistan has dealt with almost similar situation in 2010 SCMR 1546 titled "*Mohammad Abdul Moeid versus Government of Pakistan, through Secretary, Ministry of Housing and Works etc.*" in the following manner:


"8. In view of the allegations levelled against the appellant and several applications for leave on medical grounds as also medical certificates submitted by him before the Competent Authority in the Department and the realization of the Department itself that he needed to be examined by a board regarding his health, it was imperative and in the interest of justice that a regular enquiry should have been conducted."


While seeing the instant case in the light of the judgment of the Supreme Court, the applications of the appellant for grant of leave on medical ground are not specifically denied nor is his ailment denied. An enquiry was conducted but that was restricted to the absence of the appellant and despite knowledge of the department regarding ailment of the appellant, nothing was said in the enquiry report about the health condition of the appellant. Moreover, no statement of anyone was recorded by the enquiry officer during the course of enquiry proceedings, therefore, the exparte enquiry has no legs to stand upon.

7. In view of the foregoing, the instant appeal is accepted and the appellant is re-instated in service with all back benefits. Consign.

8. Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 6th day of July, 2023.

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KALIM ARSHAD KHAN
Chairman


RASHIDA BANO
Member (Judicial)

Mutazem Shah

24th April, 2023

24th April has been declared as public holiday on account of Eid-UI-Fitr, therefore, the case is adjourned. To come up for the same on 06.07.2023.



Reader

S.A #.5199/2021

ORDER

06th July, 2023

1. Learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.
2. Vide our detailed judgment of today placed on file, instant appeal is accepted and the appellant is re-instated in service with all back benefits. Consign.
3. *Pronounced in open Court at Peshawar and given under our hands and the seal of the Tribunal on this 6th day of July, 2023.*



(Rashida Bano)
Member (J)



(Kalim Arshad Khan)
Chairman


Mutazem Shah


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Peshawar

7th Sept. 2022

Appellant in person present. Mr. Muhammad Jan,
District Attorney for respondents present.

Appellant seeks adjournment on the ground that
learned counsel was busy before the Hon'ble Peshawar
High Court, Peshawar. To come up for arguments on
17.11.2022 before the D.B


(Fareeha Paul)
Member(Executive)


(Kalim Arshad Khan)
Chairman

17.11.2022

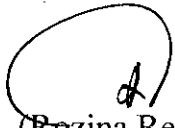
Appellant present in person:

Naseer Uddin Shah learned Assistant Advocate General for
respondents present.

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Lawyers are on general strike, therefore, case is adjourned to
11.01.2023 for arguments before D.B.


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

11.01.2023


Appellant present in person.

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

Former made a request for adjournment on the ground
that his counsel is busy in Peshawar High Court, Peshawar.
Adjourned. To come up for arguments on 24.04.2023 before
D.B.

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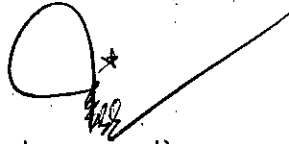

(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

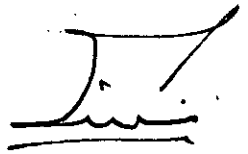
09.05.2022

Learned counsel for the appellant present. Mr. Muhammad Rasheed, District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 13.06.2022 before the D.B.



(Mian Muhammad)
Member (E)

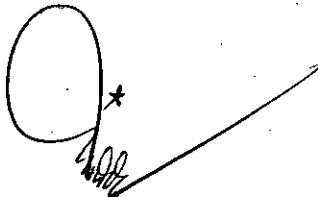


(Salah-ud-Din)
Member (J)

13.06.2022

Appellant in person present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Appellant sought adjournment on the ground that his counsel is not available today due to strike of Lawyers. Adjourned. To come up for arguments before the D.B on 07.09.2022.



(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)

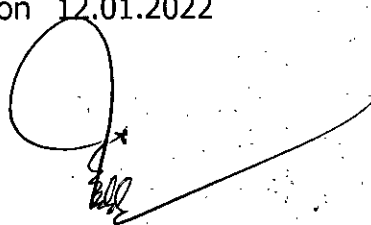


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

16.11.2021

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Zeeshan, HC for respondents present.


Written reply on behalf of respondents not submitted. Representative of the respondents seeks time to submit the same on the next date. Adjourned. To come up for written reply/comments on 12.01.2022 before S.B.


(Mian Muhammad)
Member(E)

13.01.2022

Junior to counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for respondents present.

Reply/comments on behalf respondents have already been submitted through office which are placed on file.. To come up for arguments before the D.B on 09.05.2022.


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

D.F.A

Shah Dawlazz Khan, 5199/2021

05.07.2021

Ms. Naila Jan, Advocate present and submitted fresh wakalatnama on behalf of the appellant. Preliminary arguments heard.

The appellant seeks reinstatement into service with all consequential back benefits by setting aside the impugned order. The appeal in terms of limitation seems to be time barred if it is reckoned in terms of delay in between the departmental appeal and order of the competent authority. However, keeping theas to limitation intact, this appeal is admitted for regular hearing, subject to all just and legal objections including limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 16.11.2021 before the D.B.

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KPST
Peshawar

Appellant Deposited
Security & Process Fee
14/7/21




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 5199 /2021

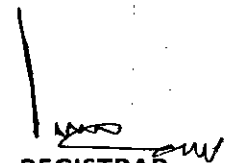
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/05/2021	<p>The appeal of Shah Dawlaz Khan resubmitted today by Mr. Inayatullah Khan , Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put there on <u>05/07/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-	27/05/21	

The appeal of Mr. Shah Dawlāz Khān Cōnstable belt no. 1736 District Police Bannu received today i.e. on 28.04.2021 is incomplete on the following score which is returned to the counsel for the appellat for completion and resubmission within 15 days.

Copy of rejection order of departmental appeal dated 08.04.2021 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.

No. 776 /S.T,

Dt. 05/05 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

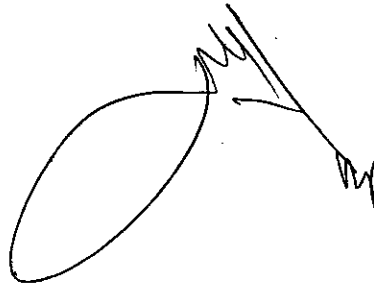
Mr. Inayatullah Khan Adv. Pesh.

Reply to the objection
viz a viz rejection order
dated: 8/4/2021.

The impugned rejection order
8/4/2021 has been enclosed
with the instant appeal
on page no. 59 since the
objection is based on mis-understanding
and kindly find same before
the bench for pre-liminary hearing.

Ashroqate:
Inayat ullah Khan
I.I.M (UK)

Resubmitted on
20/5/2021.



BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No. ____/2021

Shah Dawlaz Khan..... Appellant

Versus

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

I N D E X

S.No.	Description of documents.	Annexure	Pages.
1.	Grounds of appeal.		1-7
2.	Affidavit.		8
3.	Addresses of the parties.		9
4.	Copies of applications for grant of medical leave	A-B	10-11
5.	Copy of Naqalmad No.84 dated 13.05.2016	C	12
6.	Copy of complete medical record	D	13-53
7.	Copy of charge sheet along with statement of allegations	E-F	54-55
8.	Copy of impugned original order dated 11.08.2016	G	56
9.	Copy of departmental appeal dated 18.08.2016"	H	57
10.	Copy of Mercy Petition	I	58
11.	Copy of impugned final order dated 08.04.2021	J	59-60
12.	Copy of final report dated 20.07.2016	K	61
13.	Copy of judgment dated 08.01.2018	L	62-64
14.	Wakalatnama.		65

Dated: 24.04.2021

Appellant

Shah Dawlaz Khan

Constable Belt No.1736

Through


Inayat Ullah Khan

Advocate High Court

LL. M (U.K)

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.Khyber Pakhtunkhwa
Service TribunalDiary No. 5045Dated 28.4.2021

5199

Service Appeal No. _____/2021

Shah Dawlazz Khan son of Umar Khan

Constable Belt No.1736

Khyber Pakhtunkhwa Police District Bannu

R/O Jehangir, P.O. Torka Bazar, Lalozai,

Tehsil and District Bannu..... Appellant

Versus

- 1) Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 2) Regional Police Officer, Bannu.
- 3) District Police Officer, Bannu..... Respondents

Appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned original order No.13573-78/SRC dated 11.08.2016 against which departmental appeal dated 18.08.2016 was filed before respondent No.2 which was declined at a belated stage vide impugned final order dated 08.04.2021 against which the instant service appeal files within stipulated period of 30 days, hence the appeal is within time.

It is pertinent to mention that the appellant also filed mercy petition before respondent No.1 for reinstatement in service but the same was declined vide impugned final order dated 08.04.2021.

Filed to-day

Registrar

28/04/2021

Re-submitted to-day
and filed.

Registrar

20/5/2021

Prayer:

On acceptance of this service appeal, the impugned original order No.13573-78/SRC dated 11.08.2016 and impugned final order dated 08.04.2021 may kindly be set aside and the appellant be reinstated in service with all consequential back benefits with promotion, if due.

Any other relief to whom the appellant is found entitled during course of hearing may also be granted.

Respectfully Sheweth;

Brief facts giving rise to the instant appeal are as under:-

- 1) That the appellant was appointed as constable on 09.06.2007 in police department.
- 2) That the appellant during performance of his duty fell seriously ill and was admitted in the hospital for medical treatment requested the respondents to grant him medical leave.

It is pertinent to mention that the factum of illness of the appellant was also endorsed by Naqalmaid/ Daily Diary No.84 dated 13.05.2016 by the P.S. Moharrir.

(Copies of application for grant of medical leave and Naqalmaid No.84 dated 13.05.2016 and complete medical record are attached as Annexure "A, B, C and D").

- 3) That no formal order was passed on the applications filed by the appellant for grant of medical leave by the official respondents and subsequently exparte disciplinary

proceedings were initiated against him on the charges of absence from duty w.e.f. 13.05.2016 till unknown date.

(Copy of charge sheet along with statement of allegations are attached as Annex: "E & F").

- 4) That respondent No.3 vide Order No.13573-78/ SRC dated 11.08.2016 dismissed the appellant from service on the charges of absence from duty without taking into consideration his genuine request for grant of medical leave.

It is important to mention that the original impugned order was passed on 11.08.2016 w.e.f. 13.05.2016 with retrospective effect, which is void ab-initio.

(Copy of impugned original order dated 11.08.2016 is attached as Annex: "G").

- 5) That the appellant preferred his departmental appeal dated 18.08.2016 before the respondent No.2 which was declined vide belated final order dated 08.04.2021.

The appellant also filed Mercy Petition for his reinstatement before respondent No.1 but the same was declined vide impugned final order dated 08.04.2021.

(Copy of departmental appeal dated 18.08.2016, Mercy Petition and impugned final order dated 08.04.2021 are attached as Annex: "H, I and J") respectively.

- 6) That the office of D.S.P. Cantt District Bannu also prepared report against the appellant and the same was submitted before respondent No.3 for perusal.

(Copy of final report dated 20.07.2016 is attached as Annex: "K")

- 7) That the appellant feeling aggrieved against the impugned orders as referred above, constrained to file the instant Service Appeal for his reinstatement in service on the following amongst other grounds:

GROUND FOR APPEAL:

- a) That the impugned orders are against the law, facts and material available on record, hence not tenable in the eyes of law, which is violative of Article 4 and 10-A of the Constitution of Islamic Republic of Pakistan.

"All citizens shall be treated in accordance with law".

As per mandate of Article 10-A of the Constitution due process of law must be complied, which is a paramount provision, hence rules and regulations are subservient to the Constitutional provisions.

- b) That the respondent No.2 has passed the impugned original order with retrospective effect which is void ab-initio, hence no limitation runs against a void order. Service of the appellant could not be terminated/dismitted with retrospective effect. **(2011 SCMR 1220)**.

No limitation runs against a void order. **(1985 SCMR 1178)**.

- c) That the respondents initiated ex parte proceedings against the appellant on the charge of absence from duty without complying with the provisions of **Rule-9** which requires that the appellant be served with a notice, if he fails to report for duty then publication be made in two newspapers calling upon him to report for duty. Hence no such mandatory process was followed by the official respondents, therefore, the impugned original order dated

11.08.2016 and impugned final order dated 08.04.2021 may safely be termed as violative of Rule-9, hence the same are not sustainable in the eyes of law and liable to be set aside on this ground alone. This also indicates that the official respondents failed to comply with the mandatory provisions of Article 10-A of the Constitution of Pakistan, which in essence speaks about due process of law that rights of litigants be decided after providing a proper opportunity of defence and hearing. Likewise, principles of natural justice are also part and parcel of all statutes which also emphasis on the point that no one should condemned unheard.

- d) That no regular inquiry had been conducted against the appellant to establish the charge of absence from duty w.e.f. 13.05.2016 coupled with the fact that the appellant filed applications for grant of medical leave but the same was not responded with, with a motive to initiate exparte proceedings against him, hence it is also violative of **Rule-13 of Medical Revised Leave Rules**, which states that the authority cannot decline the request of a civil servant for grant of leave on medical grounds.

Copy of reported judgment on the point would be produced at the time of regular hearing.

- e) That the impugned orders are also violative of section 24-A of General Clauses Act as the competent authority and appellate authority failed to pass a speaking order with reasons viz-a-viz the allegations without even issuing a show cause notice to the appellant before dismissing his service.

It is pertinent to mention to serve the appellant with a show cause notice is a mandatory requirement of law and the impugned termination order is void ab-initio on this ground as well and liable to be set aside.

It is also important to state that the impugned original order dated 11.08.2016 and impugned final order were **communicated to the appellant on 08.04.2021**, hence the instant appeal is preferred within stipulated period of 30 days, which is well within time. **Reported judgment 2005 PLC (CS) 1095 Supreme Court.** Even otherwise as per judgment of larger bench of August Supreme Court of Pakistan reported in **PLD 2003 SC 724 (k)** that litigants should not be non-suited on the basis of technicalities including limitation and lis need to be decided on its merits.

- f) That no statement of allegation or any charge sheet was communicated to the appellant, which factum is violative the mandatory process.

Framing of charge and its communication to civil servant along with statement of allegations was not mere a formality but was a mandatory requisite which was to be followed. ----- principles ----- failure to follow the principle ----- the impugned penalty was set aside. (2000 SCMR 1743).

- g) That competent authority has initiated the summary proceedings without providing an opportunity of hearing to justify his case by the appellant during course of a regular inquiry and the factum of illness of the appellant was altogether ignored and imposed the major penalty of dismissal from service upon the appellant without adhering to the principles of natural justice, which are part and parcel of all statutes and also violative of the mandatory provisions of Article 10-A of the Constitution of Pakistan, hence the impugned orders cannot be sustainable within the four corners of law.
- h) That no **opportunity of personal hearing** was afforded by the competent authority nor by the appellate authority, which is another instance, which could be considered as a

flagrant violation of the E&D Rules or any other concerned rules hence, the impugned orders are against the well recognized principles of natural justice which sufficient to vitiate the entire disciplinary proceedings carried out against the appellant at his back in his absence.

- i) That this Hon'ble Tribunal in another service appeal vide judgment dated 08.01.2018 reinstated the appellant and the impugned order was set aside as the same was passed with retrospective effect which was declared as illegal, void ab-initio and not sustainable in the eye of law.

(Copy of judgment is attached as Annex: "L").

- j) That additional grounds will be raised at the bar with kind permission of this Hon'ble Tribunal.

Keeping in view, what has been stated above, it is, therefore, humbly requested the impugned original order No.13573-78/ SRC dated 11.08.2016 and impugned final order dated 08.04.2021 may kindly be set aside and the appellant be reinstated in service with all consequential back benefits and promotion, if due.

Any other relief, which has not been specifically asked for and to whom the appellant is found entitled may also be granted.

Dated: 24.04.2021



Appellant
Shah Dawlaz Khan
 Constable Belt No.1736

Through



Inayat Ullah Khan
 Advocate High Court
 LL. M (U.K)

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No. ____/2021

Shah Dawlaz Khan..... Appellant**Versus**Inspector General of Police, Khyber Pakhtunkhwa,
Peshawar & others..... Respondents**AFFIDAVIT**

I, **Shah Dawlaz Khan** son of Umar Khan Constable Belt No.1736 Khyber Pakhtunkhwa Police District Bannu R/O Jehangir, P.O. Torka Bazar, Laloza, Tehsil and District Bannu do hereby affirm and declare on oath that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Khalid Mahmood
KHALID MAHMOOD
 ADVOCATE
 Oath Commissioner
 Peshawar High Court

Shah Dawlaz Khan
 Deponent

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

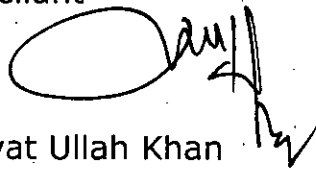
S.A.No.____/2021

Shah Dawlazz Khan..... Appellant**Versus**Inspector General of Police, Khyber Pakhtunkhwa,
Peshawar & others..... RespondentsADDRESSES OF THE PARTIESAPPELLANT:**Shah Dawlazz Khan** son of Umar Khan
Constable Belt No.1736
Khyber Pakhtunkhwa Police District Bannu
R/O Jehangir, P.O. Torka Bazar, Lalozaï,
Tehsil and District BannuRESPONDENTS:

- 1) Inspector General of Police, Khyber Pakhtunkhwa,
Peshawar.
- 2) Regional Police Officer, Bannu.
- 3) District Police Officer, Bannu


Appellant

Through


Inayat Ullah Khan
Advocate High Court
LL.M (U.K)

Dated: 24.04.2021

مخبریت جناب DPO صاحب بنوں

درخواست برائے Medical leave یوحہ بیماری

جناب عالی!

سائل آجناب کے حضور حقیقت پر مبنی حاضرانہ
مرض کہتا ہے۔ کہ سائل مورخ 2007-6-9 کانپلہ
کانپلہ ہے۔ مورخ 2006-5-12 کو سخت تکلیف / بیماری میں
متبدل ہوں۔ اس دن پولیس ڈائری میں آیا۔ سائل
جبورا DHQ ہسپتال بنوں گیا۔ OPD ڈاکٹر نے دوائی
تاکہ مکمل Bed Rest کی رہائی کا۔ وقتاً فوقتاً ڈاکٹر صاحب
سے ملنے کرتا ہوں۔ ٹیسٹ کرنے پر بیٹہ میں تھوڑی تھوڑی اور
علاج کرتا رہا۔ اس امر کے علم بیماری کے متعلق آگاہ کرتے
Medical leave کی درخواست کی مگر اس نے یہ ایسا ہی کہ
درخواست برائے Medical leave DPO صاحب کو پیش کرے۔

لینا درخواست نیا کے زریعے آپ DPO صاحب پولیس انہر
بنوں سے التماس کی جاتی ہے کہ درخواست نیا کو منظور کر کے
مجھے 4 مہینوں کا رخصت عائد فرمائیں۔

نوٹ۔ مورخ 2006-5-13 سے Medical leave منظور
فرمائی جاوے۔

کانپلہ۔ تھانہ دو لار خان۔ - 1736

مورخ۔ 2006-5-13

Slr

ATTESTED

مخبریت جناب DPD صاحب بنوں

درخواست برائے Medical leave بوجہ بیماری

جناب عالی!

سائل آ جناب کے حضور حقیقت پر مبنی حاضرانہ عرض کرتا ہوں۔ کہ سائل مورخہ 2007-6-9 کا برآمدہ کانسٹیبل ہے۔ مورخہ 2007-5-12 کو سخت کٹیف / بیماری میں مبتلا ہوں۔ اس دن پولیس ڈائری میں آیا۔ کونسل جبورا DHQ ہسپتال بنوں گیا۔ OPD ڈاکٹر نے دوایں لکھ کر مکمل Bed Rest کی رہائی کا۔ وقتاً فوقتاً ڈاکٹر صاحب سے ملتا کرتا ہوں۔ ٹیسٹ کرنے پر بیٹہ میں تھمے نمودار ہوئی اور علاج کرتا رہا۔ اس عمر کے علم بیماری کے متعلق آگاہ کرنے Medical leave کی درخواست کی مگر اس نے یہ ایسا ہی کہ درخواست برائے Medical leave DPD صاحب کو پیش کرے۔ لہذا درخواست نذا کے زریعے آپ DPD صاحب پولیس انہم بنوں سے التماس کی جاتی ہے کہ درخواست نذا کو منظور کر کے مجھے 4 مہینوں کا رخصت عائد فرمائیں۔

نوٹ: مورخہ 2016-5-13 سے صاحب Medical منظور فرمائی جاوے۔

آپنا بہار - کانسٹیبل - تہاہ دولاز خان - 1736

مورخہ 2016-5-26

Shah

ATTESTED

صلاح بن

تاریخ 84 - 13/5/16

لوہی سہیل

84 رپورٹ }
رنگین مٹا کر 13/5/16 وقت 07:10 بجے درج ذیل
کامپل شاہدولازمہ 1736 کو لکھنؤ عوامی صحت کیمپ میں 22

روزانہ 12/5 کو لوہی سہیل سہیل روڈ کتا ڈاکٹر صاحب
سے رپورٹیں جمع کروانے کے لئے DHQ سہیل

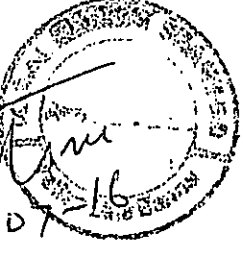
سہیل روڈ کے عمارت 33/5 روزانہ 12/5 روانہ
کئے گئے کافی انتظامیے مادیات کی ضرورت کی ضرورت نہ ہوگی

تہہ درج ذیل سہیل سے بہت کم خود خریدا گیا ہے یہ سہیل سے
مذکورہ مادیات کے خلاف رپورٹیں بھیجی گئی ہیں

صالح

نیل مہانتی اصل سے

19-07-16
MA 51



ATTESTED

Annexure "D" (13)

DHQ TEACHING HOSPITAL BANNU

Out patient Department

Name: [Signature]

OPD No. 48866

Date: 12/5/06

Gall Stones: 12 FX
+ Ch. CR. Calc. stones circumfer

Tas. Leds. 135 R
12.5 cm ml

The Prox. 1.2

Sy. Leds. 1.2

Handwritten notes in Urdu

Original Specimen
D.H.Q. Hospital Bannu

ATTESTED

(14)

M.T.I. DHQ TEACHING HOSPITAL, BANNU
Out patient Department

Name: 14/20/06

OPD NO: 52980

Date: 19/6/06

Rev.

[Handwritten signature]

[Handwritten notes]
Tag Nexum 120

Tag Wellvit
061 0 120

Rep to Peshawar
(KTH/LRH) *[Signature]*
Surgical Specialist
D.H.Q. Hospital Bannu

ATTESTED

13

D.H.Q Teaching Hospital Bannu

Book No: No: 06 Date: 12/1

Received From: _____

The Sum of Rupees: 100/-

in Cash: _____

On account of: Hly

Accountant

Treasurer

Hly
M
PCC

Rs. 100/-

Accountant

ATTESTED

16

DHQ TEACHING HOSPITAL BANNU



Pt. Name: Ujwal Singh Date: 12/1/16
Ward: _____ Ad: Number: _____

BLOOD PROFILE

MP	NO	PV	F	FBS:	mg/dl
HB%			gm%	RBS:	mg/dl
TLC			/cmm	Urea:	mg/dl
LDC	P →		%	Creatinine	mg/dl
=	L →		%	SBR	mg/dl
=	M →		%	ALT (SGPT)	74
=	E →		%	Alkaline	mg/dl
=	B →		%	Uric Acid	mg/dl
				T. Cholesterol	mg/dl
ESR		mm/hr		BT	mts
RA Factor:				C.T	mtsl
ASO Titre		u/i		HBSAg	Neg
Platelets		/cmm		HCV	Neg
Widal	S:TO:			HIV	
=	S:TH			LD	

Trop T _____ Typhoid: 1gG _____ 1gM _____

VDRL: _____ Myco-dot: _____

URINE ANALYSIS

Colour: _____ Sp: Gravity: _____
Sugar: _____ Albumin: _____

MICROSCOPY

Pus Cells: _____ HPE Red Cells _____ HPE
A= Urates _____ HPE Pregnancy _____
Crystal _____ HPE Casis _____ HPE

Signature: _____

ATTESTED

17

DHIS - 02 (F)

Sent To: _____

OUT DOOR PATIENT TICKET

District Bans

CRP No: _____

Facility Name _____

Name 1736 W/O C/S Age: 30 Sex: M

Father's/Husband's Name _____

Monthly OPD Serial No. 68/5

Provisional Diagnosis: _____

Date

Clinical Findings / Investigations / Treatment / Referred / Test Findings

12/15/16

R/d Refer to DHO
Hospital
Bans.

12/15/16

Police & PC
Hospital Bans



ATTESTED

18

تعمیل بروز ہفتہ - اتوار:- معائنہ کیلئے پرانے نسخے، ٹیسٹ، ایکریے اور دوائیاں وغیرہ ساتھ لائیں۔

PROF. SIRAJUDDIN AHMED

F.C.P.S. (Pak), F.R.C.P. (Edin), F.R.C.P. (Glasgow)
HONORARY PHYSICIAN,
TO THE PRESIDENT OF PAKISTAN
FORMERLY MEMBER,
PAKISTAN MEDICAL AND DENTAL COUNCIL
HEAD OF DEPARTMENT OF MEDICINE
DEAN AND PRINCIPAL,
KHYBER MEDICAL COLLEGE, PESHAWAR

S. No. 073

Consultation by Appointment on week days only
For Appointment Ring: 091-2573144, 2593076
From 9 AM to 12 PM, Mob: 0300-5500387
Dabgari Garden, Samad Building, Peshawar.

Date: 28-5-18

Mr/Mrs/Miss/Dr سیدہ دولار خان Age 29 Residence سول

Occupation _____ Children Alive M _____ F _____ Dead: _____

Past Illnesses _____

Drugs Taken _____

Pulse _____ BP 120/80 Resp _____ Temp _____

HISTORY

Heart Burning

Angry mood

Stomach pain

MBS 124

MCO 750g

Stool 2980gules

SrP 56

A.P.H. 288

Check up. Jundice

Hand @ Stool @ Stool ?

Diagnosis	دست	طریقہ استعمال	کھانے کے بعد	کھانے سے پہلے	شام	دیگر	دوپہر	صبح	خوناک کی نوعیت
Promacol 20	بارے		✓		✓			1	
Indinol 10	"		✓		1			0	
Librax	"			✓	1			1	
Colofac	"			✓	1			1	
Hepamerz 800	"				3			3	صوبہ

ATTESTED

Prof. Sirajuddin Ahmed for hand call

پیشہ

19

Excellent

Medical Laboratory



Add:
Prof Dr. Siraj
Clinic Samad Building
Dabgari Gardan Peshawar.
Ph: 091-2593076 - Mob: 0300-5500387

NAME SHAH DILAWAR KHAN
REF BY DR.SIRAJ
TEST CBC

SEX ? Y / F
DATED 16.05.16
P.ID # 10

TESTS	RESULTS	UNITS	N.VALUES
HAEMOGLOBIN	13.2	G/DL	M.13 - 18 F. 12 - 16 ✓
WBCs COUNT.....	9,800	/CMM	4000 - 11000
PLATELETS	2,59,000	/CMM	150000 - 450000
ESR	--	MM/HR	04 - 10
POLYMORPHS	68	%	40 - 75 %
LYMPHOCYTES	27	%	20 - 45 %
MONOCYTES	02	%	02 - 10 %
EOSINOPHILS	03	%	01 - 06%

COMMENTS :-

ATTESTED

If Doubtfull Cases Free Repetition is Offered with in 24 Hours of Reporting

Excellent

Medical Laboratory



20
Add:
Prof Dr. Siraj
Clinic Samad Building
Dabgari Gardan Peshawar.
Ph: 091-2593076 - Mob: 0300-5500387

NAME SHAH DILAWAR KHAN
REF BY DR.SIRAJ
TEST LIVER PROFILE

SEX ? Y / M
DATED 16.05.16
P.ID # 10

Liver Profile

TESTS	RESULTS	UNITS	N.VALUES
BILIRUBIN (D)	<u>0.70</u>	MG/DL	0.2 - 1.0
BILIRUBIN (D)	<u>0.50</u>	MG/DL	0.2 - 1.0
S.BILIRUBIN (IND)	<u>0.20</u>	MG/DL	
ALT (SGPT)	<u>56</u>	U / L	0 - 40
ALK.PHOS	<u>288</u>	U / L	70 - 258

COMMENTS :-

Test/s Performed by Map Lab Plus Chemistry Analyzer
Variations can be occurred due to difference in sensitivity, specificity,
Reproducibility of different assay techniques used in different labs.

ATTESTED

If Doubtfull Cases Free Repetition is Offered with in 24 Hours Reporting

Excellent

Medical Laboratory



21

Add.
Prof Dr. Siraj
Clinic Samad Building
Dabgari Gardan Peshawar.
Ph: 091-2593076 - Mob: 0300-5500387

NAME	SHAH DILAWAR KHAN
REF BY	DR.SIRAJ
TEST	HCV / HBS

SEX	?Y / F
DATED	16.05.16
P.ID #	10

TESTS	RESULTS	HISTORY
-------	---------	---------

HCV Antibodies.....	<u>NEGATIVE</u> <u>NON REACTIVE</u>
---------------------	--

HBS Antigens	<u>NEGATIVE</u> <u>NON REACTIVE</u>
--------------------	--

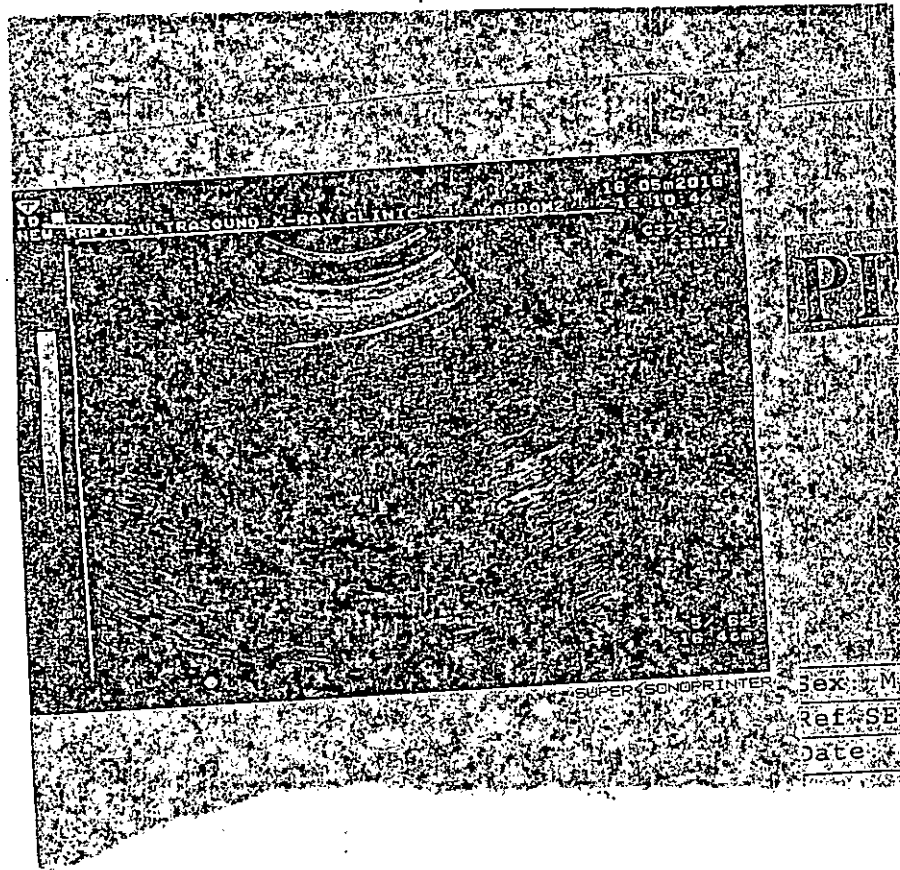
Test,s Performed By " SD " Devises Made of USA ICT.

COMMENTS :-

AFFECTED

If Doubtfull Cases Free Repetition is Offered with in 24 Hours of Reporting

(22)



ATTESTED

23

NRCX
EUC

New **RAPID** COMPUTERIZED X-RAY & ULTRASOUND ECG CLINIC

Name: SHAH DILAWAR KHAN	Sex: M	Age: ?Years
US: Abdominal	Ref SELF	
Patient I.D: NRUSC- 03-06-0004	Date: Monday, May 16, 2016.	

ABDOMINAL ULTRASOUND FINDINGS

- Liver is of normal size having increase echogenecity with diffuse infiltrative changes, with no evidence of sonographically detectable focal mass lesion.
- Portal is of normal size measuring 7mm in size.
- Extra/intra hepatic biliray and vascular channel not dilated.
- **Gall bladder contains few calculi in its lumen features are suggestive of Cholelithiasis..**
- Both kidneys are normal in size and shape having adequate amount of cortex; no stone, parenchymal or obstructive changes evident in either kidney. No peri-nephric abnormality seen.
- Spleen, Pancreas and para aortic region appear normal sonographically.
- No free fluid is seen in the peritoneal cavity.
- Urinary bladder is EMPTY at the time of scan.



CHOLELITHIASIS

> FATTY LIVER

ATTESTED

RADIOLOGIST

24

Surgeon

Dr. Mahmood Jan

M.B.B.S, F.C.P.S.

INCHARGE SURGICAL "A" UNIT

D.H.Q. Hospital Bannu

INVALID FOR
MEDICO LEGAL
PURPOSE

14 JUL 2016

سرجن
ڈاکٹر محمود جان

ایم. بی. بی. ایس. ایف. سی. پی. ایس
انچارج سرجیکل "اے" یونٹ
ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بنوں

Sh. D. D.

Pr 3.1

Rec. Pass! RHC

By

25 *Olyza* ✓

2 *Atis* ✓

2 *IPR108* ✓

2 *Shahar* ✓

WIS. Coll. Stun

AP

PP

ATTESTED

25



BASHIR CLINICAL LABORATORY

Near National Bank Railway Road, Banu

Consultant
Dr. Muhammad Bashir

(Regd. Computerized)
Reg No. HRA/500/R Bu/LAB/9

بشیر کلینیکل لیبارٹری

زود پرائمیشنل بینک ریلوے روڈ بنوں

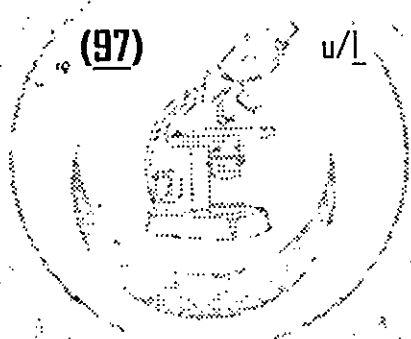
M.B.B.S. F.C.P.S.
MEDICAL SPECIALIST (Rtd)
D. Clinical Pathologist
D.H.Q. Hospital Bannu.

☎ 0928-660710

Pl, NAME	Shadaullah.	Sex:-M/F
Test Required	SGPT (ALT) Test.	Date:- July 12, 2016
Ref. By	Self	

Q. No. 1234567

TEST	Result	UNITS	NORMAL VALUES
→ <u>SGPT (ALT)</u>	(97)	u/l	NOR. UP TO: 42 u/l

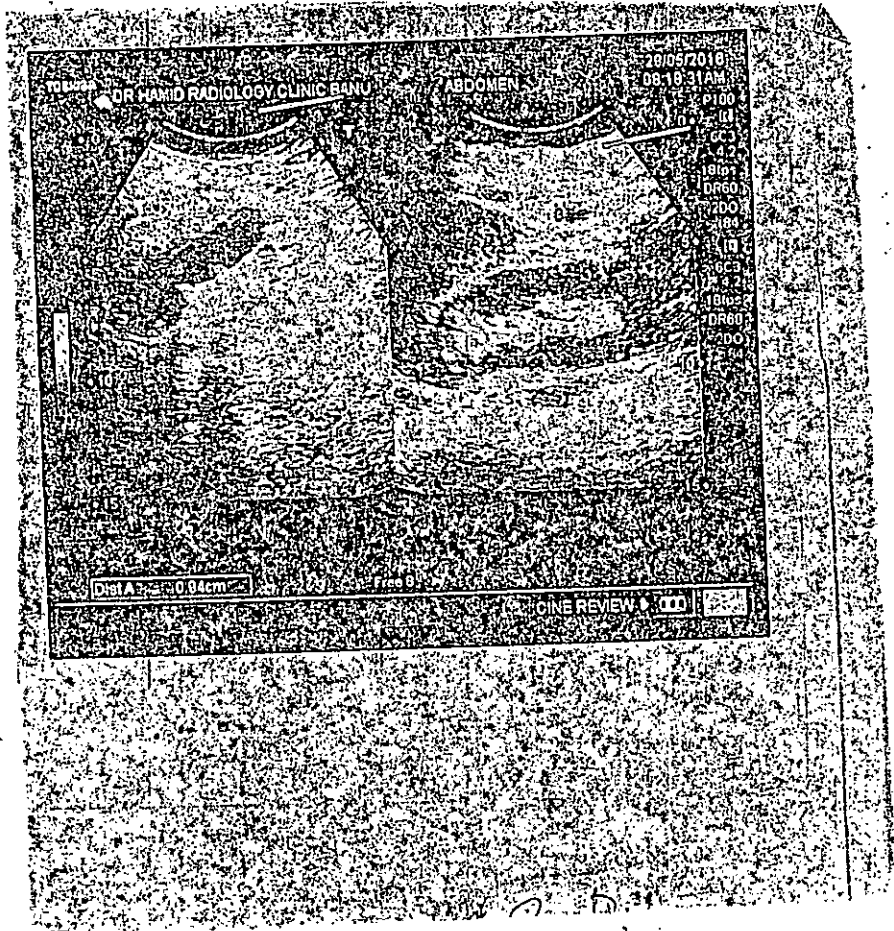


Signature

ATTESTED

In case of any clinical doubt please call laboratory within 24 hrs for free repeat of any one test from this sample

26



ATTESTED

250
conclusion = 250

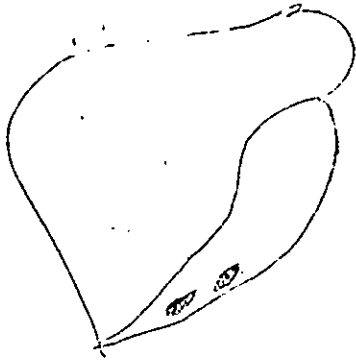
27

ڈاکٹر حمید اللہ سائونڈ اینڈ ریڈیالوجی کلینک

Attendant No: 0334-5322724

کلینک و بائوڈیالکٹ سروسز 2 سڑک برٹنڈا اور لیجنگ ہسپتال بنوں

ص 110



→ Two calculi in GB -
larger is 9mm.

No acute inflammation

Rest of the viscera
are normal

29/5/16

ATTESTED

ڈاکٹر حمید اللہ سائونڈ اینڈ ریڈیالوجی کلینک
2 سڑک برٹنڈا اور لیجنگ ہسپتال بنوں

ڈاکٹر حمید اللہ وزیر سائونڈ اینڈ ریڈیالوجی کلینک
ایم بی بی ایس (پنجاب)، ایم سی بی ایس (ریڈیالوجی) (کلینک و بائوڈیالکٹ سروسز 2 سڑک برٹنڈا اور لیجنگ ہسپتال بنوں)

28

ILYAS ULTRASOUND

Opposite Gate No. 2 District Headquarter Hospital Bannu



DR. ILYAS HUSSAIN SHAH
M.B.B.S., R.M.P
Ultrasound Specialist

P. Name Sheela Ullah Age/Sex _____

Ref by Dr. _____ Date 14.7.16

LIVER : Normal in size. Moderate diffuse increase in fine echoes in hepatic parenchyma impairing the view of vasculature and parenchyma. Contours are regular and smooth in outlines. No intra or extra hepatic cholestasis seen.

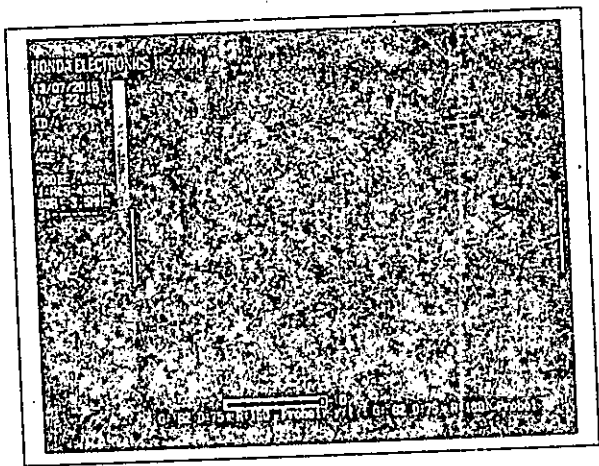
SPLEEN : Normal in size. No focal lesion seen.

GB : Few small freely mobile stone echoes detected in the lumen. No wall thickening / pericholecystic collection seen.

Pancreas and para aortic regions are normal. Portal vein measure normal in dia.

KIDNEYS : Size, shape and position are normal. No evidence of stone / hydronephrosis. Normal cortical thickness and echogenicity.

U. BLADDER : No stone / wall thickening seen.
No mass, abscess or fluid collection seen in abdomen.



FATTY LIVER.
SMALL GALL STONES.

ATTESTED

(Handwritten signature)

29

Dr. Zahid Hussain

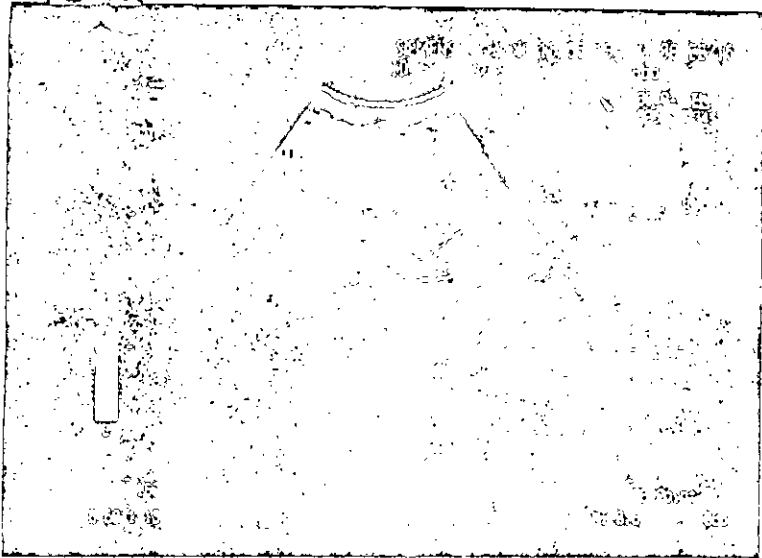
M.B.B.S. (KE), F.C.P.S., F.A.C.S.(USA)

Consultant Urologist Surgeon

(with special interest in E.S.W/L & Endourology)

- Lithotripsy Expert (Germany)
- Member of Pakistan Association of Urologist Surgeons (PAUS)
- Member of Society of Surgeons Pakistan (SSP)
- Member of American Urology Association Urological.

22 AUG 2013



J. Enxaid
206 x 171

J. Hussain
206 x 171

Cap 206 x 171

J. Silliver
206 x 171

TS 29 AUG 13

TS

- Cap Urso 500

206 x 272

ATTESTED

The Gold Standard in Lithotripsy Pakistan

Hussain Kidney Hospital, 77- Ali Block, New Garden Town, Opp. Barkat Market, Nearby Jeewan Hana, Behind TOTAL Petrol Pump and Bank Of Punjab, Lahore, Pakistan. Tel: +92- 42- 35911185 - 35863098, 35882109-35832277-35882633 Fax: 042-35882109, Emergency Mob No: 0333-4206197, 0321-3393999 E-mail: zahidhussaineswl@gmail.com, URL: www.hussainkidney.com

The Gold Standard in Lithotripsy in Pakistan

30



HUSSAIN

Kidney & Gall Stone Hospital

Equipped with "Siemen's Lithostar Multi Line of Germany"
Most Sophisticated and Effective Lithotripter for
E.S.W.L (Extracorporeal Shock Wave Lithotripsy).

Dr. Zahid Hussain
M.B.B.S. (KE), F.C.P.S., F.A.C.S.(USA)
Consultant Urologist Surgeon
(with special interest in E.S.W.L & Endourology)

- Lithotripsy Expert (Germany)
- Member of Pakistan Association of Urologist Surgeons (PAUS)
- Member of Society of Surgeons Pakistan (SSP)
- Member of American Urology Association Urological.

22 AUG 2016

Handwritten notes:
Ino...
9... + 4...

Handwritten notes:
Gall bladder...
filled with bile
no... of...
cholecystitis

Handwritten notes:
J. Encaid
216 x 171

Handwritten notes:
J. Hussain
206 x 171

Handwritten notes:
Cap 206 x 171

Handwritten notes:
J. Sullivan
206 x 171+1

30 DEC 2016 *Handwritten:* USG Sac.

09 MAR 2017 *Handwritten:* SSP 69-7/16

UITS 29 OCT 2016 *Handwritten:* Sac.

Handwritten notes:
Cap Urso 500
206 x 272

ATTESTED

The Gold Standard in Lithotripsy in Pakistan

Hussain Kidney Hospital, 77- Ali Block, New Garden Town, Opp. Barkat Market, Nearby Jeewan Hana, Behind TOTAL Petrol Pump and Bank Of Punjab, Lahore, Pakistan. Tel: +92- 42- 35911185 - 35863098, 35882109-35832277-35882633 Fax: 042-35882109, Emergency Mob No: 0333-4206197, 0321-3393999 E-mail: zahidhussaineswl@gmail.com, URL: www.hussainkidney.com

SEHER PHARMACY

77-ALI BLOCK NEW GARDEN TOWN LAHORE.

(31)

Ph: 04235832277

Invoice No: 3,477

Sales Invoice

Date: 09-Mar-17

Reference: SHAH DOLA

Customer: Cash Sales

#	Particulars	Qty	Rate	Amount
1	Urso 500 mg	60.00 NOS	52.50	3,150
2	Plasenzym Tab	30.00 NOS	8.90	267
3	Enoxabid 100 mg	30.00 NOS	40.88	1,226
4	Silver 20 mg	60.00 NOS	6.90	414
5	Zolbi 40 mg capsules	15.00 NOS	17.86	268

Amount In Words: FIVE THOUSAND THREE HUNDRED TWENTY-FIVE

Total: 195.00 5,325

PAID
09 MAR 2017

Net Amount: 5,300

Checked By _____

ATTESTED

32

Name :- Shad Awla³ Sex :- ~~Male~~ female Age :- ?
Ref By Prof Dr Noor Wazir Reporting Date :- 16-May-17

FBC..RBS

TEST RESULT	N.RANGE
WBC 10.6 x 10 ⁹ /l	(M: 4.0-10.0) F:4.0-10.0)
RBC 5.73 x10 ¹² /l	(M: 4.5-6.3) F: 3.80-5.20)
HB 14.6 g/dl	(M:14.0-18.0 F:11.7-15.7)
HCT 46.5 %	(M:39-52) F: 35-46)
MCV 80.7 fl	(M: 77-91) F: 77-91)
MCH 25.4 pg	(M:26-32) F:26-32)
MCHC 31.2 g/dl	(M:32-36) F:32-36)
Platelets:-301,000 /cmm	(150,000-400,000)

DLC

Neutrophils	43 %	40----75
Lymphocytes	50 %	20----40
Monocytes	03 %	02----10
Eosinophil	04 %	02----06

Sugar 106 mg /dl 60-----160

A Complete diagnostic solution with the comfort of a caring hand

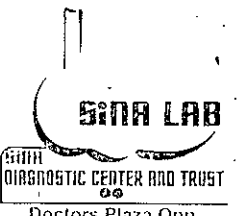
ATTESTED



Noor Plaza:

سینا لیب
نور پلازہ نزد الریاض ہوٹل
ڈاکٹر نواز روضہ ڈگری کالج
فون: 091-2215472

مین برانچ



Doctors Plaza Opp.
Hayatabad Medical Complex
Hayatabad, Peshawar
E-mail: sina_diagnostic_center@hotmail.com

سینا لیب
سینا ڈائیگنوسٹک سنٹر اینڈ ٹرسٹ
ڈاکٹر نواز روضہ ہسپتال ایف ڈی ایچ ایف ایچ
ہیٹ آباد پشاور
فون: 091-5825046 5811444
Mob: 0300-5995422

33

NOT VALID FOR LEGAL PURPOSE

تعمیل بروز اتوار
رابطہ: 091-2571133

پروفیسر محمد نور وزیر

ایم بی بی ایس (گولڈ میڈلیسٹ) ایم آر سی پی (برطانیہ) ایف آر سی پی (ایڈنبرا)
میڈیکل سپیشلسٹ اینڈ نیفرالوجسٹ

No: 56

پروفیسر اینڈ ہیڈ آف ڈیپارٹمنٹ (میڈیسن) حیات آباد میڈیکل کیمپس پشاور میڈیکل اے وارڈ
PMDC. Regd No. 5513-N

16 MAY 2017

Name Shad-Allah Age _____ Sex M Date _____

120/80 IBs = Di° - G. Stone WT 103 → 98kg

ATTESTED

62 - Target du
100

62 - Librer
100

62 - Recherche du
100

62 - ALP 0-5
100

62 - Recherche 100
100

62 - Recherche 100
100



Noor Plaza

سینا لیب
نور پلازہ، نزد الریاض ہوٹل
رامداس روڈ ڈبگری پشاور
فون: 091-2215472

مین برانچ



Doctors Plaza Opp.
Hayatabad Medical Complex
Hayatabad, Peshawar
E-mail: sina_diagnostic_center@hotmail.c

سینا لیب
سینا ڈائیگنوسٹک سنٹر اینڈ ٹرسٹ
ڈاکٹر یازدیا جامعہ حیات آباد سیدیکل کالجز
حیات آباد پشاور
فون: 091-5825046, 5811444
Mob: 0300-5995422

Name :- Sad Ullah Sex :- male Age :- ?
Ref By Dr Noor Wazir^{MD} Reporting Date :- 29-Mar-17

(34)

FBC.ALT.RBS

TEST RESULT	N.RANGE
WBC 11.9 x 10 ⁹ /l	(M: 4.0-10.0) (F:4.0-10.0)
RBC 5.42 x10 ¹² /l	(M: 4.5-6.3) (F: 3.80-5.20)
HB 14.1 g/dl	(M:14.0-18.0) (F: 11.7-15.7)
HCT 43.9 %	(M:39-52) (F: 35-46)
MCV 81.0 fl	(M: 77-91) (F: 77-91)
MCH 26.0 pg	(M:26-32) (F:26-32)
MCHC 32.1 g/dl	(M:32-36) (F:32-36)
Platelets -287,000 /cmm	(150,000-400,000)

DLC

Neutrophils	50 %	40---75
Lymphocytes	43 %	20---40
Monocytes	04 %	02---10
Eosinophil	03 %	02----06

ALT 51 U/l 10-----41
Sugar 158 mg/dl 60-----160

[Handwritten signature]

A Complete diagnostic solution with the comfort of a caring hand

ATTESTED

تعمیل پروزا نو
رابطہ: 2571133

پروفیسر محمد نور وزیر

NOT VALID FOR LEGAL PURPOSE

ایم بی بی ایس (گولڈ میڈلسٹ) ایم آر سی پی (برطانیہ) ایف آر سی پی (ایڈنبرا)
میڈیکل سپیشلسٹ اینڈ نیفرالوجسٹ
پروفیسر اینڈ ہیڈ آف دی ڈیپارٹمنٹ (میڈیسن) حیات آباد میڈیکل کیمپس پشاور

No: 48

Name Shadullah Age Sex M Date

12/1/90 10/3k. J ± Bs ± Di ± Gr. Stone

ATTACHED

کلینک: نور پلازہ نزد الریاض ہوٹل ڈبگری گارڈن پشاور نور پلازہ نمبر: 091-2571133

1. P. ...

22

1. ... 130

22

①

1. ...

22

①

1. ...

22

①

1. ...

22

①

Shah Jehan

MBBS, MCPS,
RTC Certificate

Shah
Ultrasound Clinic

(36)

ڈاکٹر شاہ جہان

ایم بی بی ایس، ایم سی پی ایس
آر ٹی سی، سرٹیفکیٹ

Name	Shadaullah	Date	29 March 2017
------	------------	------	---------------

ULTRASOUND ABDOMEN AND PELVIS

- Liver : Liver is showing increased paranchymal echogenicity --- fatty liver .
No focal lesion seen
- Portal vein : normal caliber
- Gall Bladder : G.B is showing small calculi largest one is measuring 7 mm with
normal wall thickness of G.B
- CBD : Normal.
- Pancreas : Normal morphologically.
- Spleen : Spleen size is normal with homogenous texture
- Both kidneys : Both kidneys appear normal in size, shape and echo texture with
adequate cortical thickness. No calculus, mass, cyst or
hydronephrosis seen on either side.
- Urinary Bladder : Empty
- Para-aortic lymph nodes : Normal
- Ascites : Nil
- Pleural effusion : Nil
- IMPRESSION : Fatty liver
Cholilithiasis

ATTESTED



37



BASHIR CLINICAL LABORATORY

Near National Bank Railway Road, Bannu

Consultant

Dr. Muhammad Bashir

F.S.B.S. F.C.P.S.
MEDICAL SPECIALIST (RIC)
D. Clinical Pathologist
D.H.Q. Hospital Bannu.

(Regd. Computerized)
Reg No. HRA/500/R BU/LAB/9

بشیر کلینیکل لیبارٹری

نزد پرانا ہسپتال بینک ریلوے روڈ بٹنوں

© 0928-660710

Pt, NAME	Shadaullah.	Sex:-M/F
Test Required	SGPT (ALT) Test.	Date:- March 2, 2017
Ref. By	Self	

Q2701 07/07/017

TEST

→ SGPT (ALT)

Result

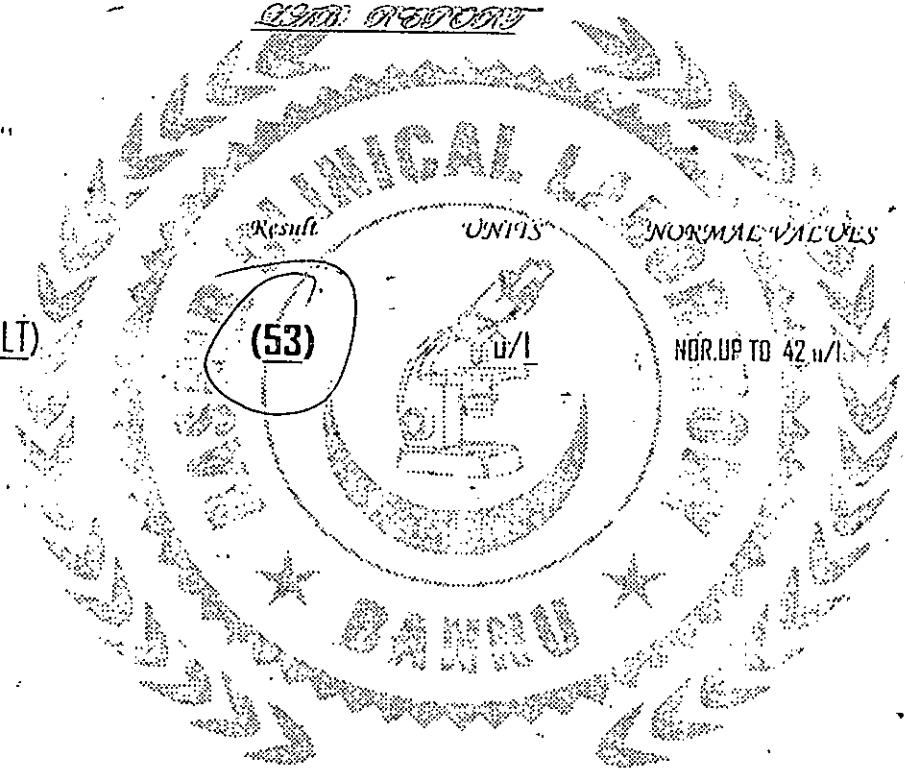
UNITS

NORMAL VALUES

(53)

U/L

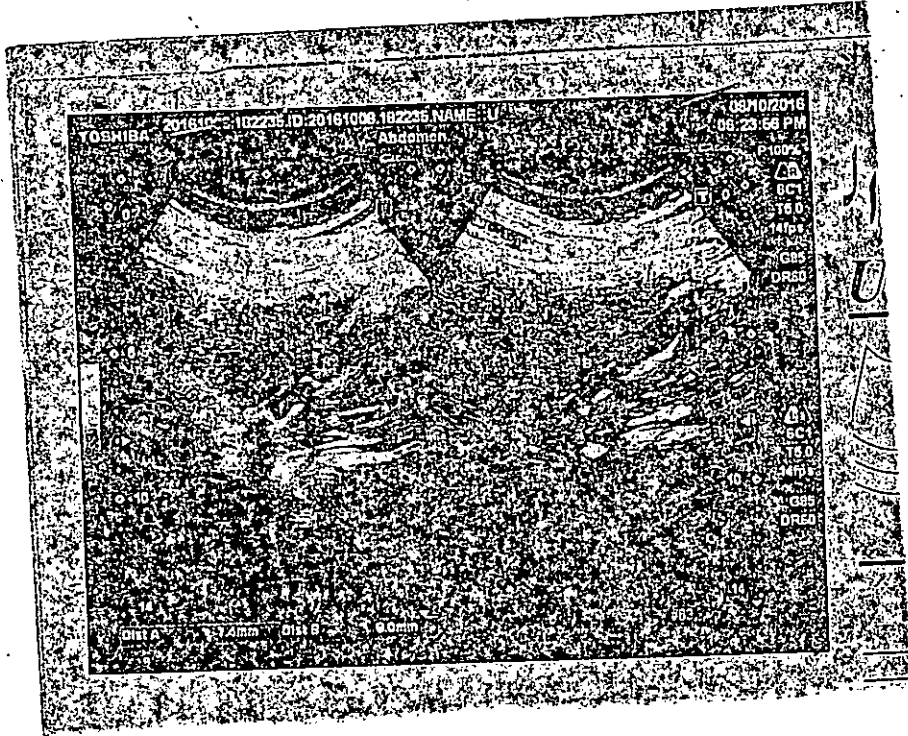
NOR. UP TO 42 U/L



Muhammad Bashir
Bashir

In case of any clinical doubt please call laboratory within 24 hrs for free repeat of any one test from this sample.

38



ATTESTED

39

سَيِّفُ الطَّرَاسَاوُ نَدُّ كَلِيْنِك

SAIF ULTRASOUND CLINIC

Dr. Saif-ur-Rehman Kamran Marwat
M.B.B.S. (Pesh)



ڈاکٹر سیف الرحمن کامران مروت
الطراساؤ نڈ سپیشلسٹ
ایم بی بی ایس

ULTRASOUND SPECIALIST

Opposite Zanana Hospital Bannu. Ph:

کلینک :- بالقابل زانانہ ہسپتال، بنوں

Name Shada ullah Ref by _____ Date 8/1/16

ULTRASOUND FINDINGS

* Non-fasting GB having normal wall thickness containing two stones 8.0 mm - 7.4 mm in dia. CB is normal (3mm)

* Diffuse fatty liver. No focal lesion seen.

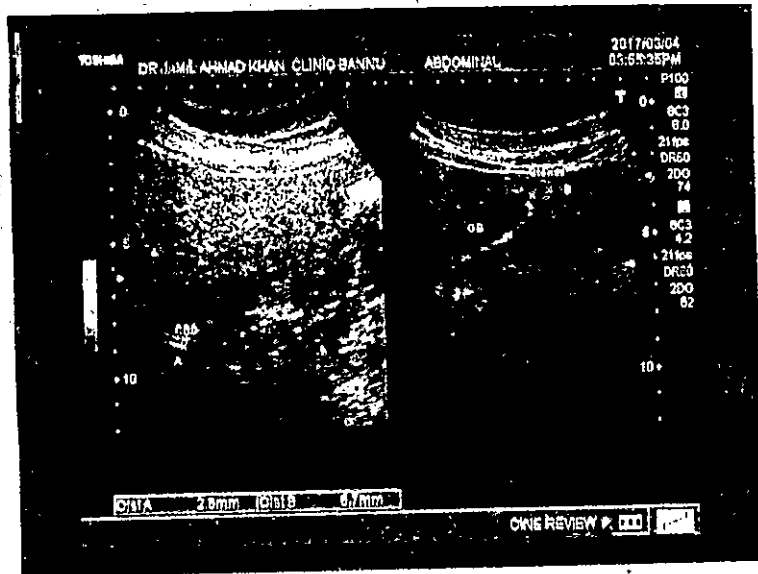
Pancreas, upper pole-aortic origin spleen, kidneys and UB are normal.

No ascites.

Impression: 1. Gall stones
2. Fatty liver

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40



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41

ڈاکٹر جمیل التراساؤنڈ کلبک

زادہ ہسپتال روڈ حسین پل تھمہر و مہنول

PT Name: SHAIHAULAZ.

Age/Sex 27

Ref by: OPR.

Date: March 4, 2017.

ULTRA SOUND ABDOMEN/PELVIS.

LIVER is mildly enlarged having increased echogenecity with uniform texture suggestive of fatty liver...

No focal lesion seen. No intrahepatic biliary or vascular dilatation seen.

GALL BLADDER is of normal size and wall thickening having

atleast three stones of 6.7 mm and smaller fundal area-- in

phregeon cape. CBD 2.6 mm and PORTAL VEIN are normal.

KIDNEYS are normal in size and position having no mass / lithiasis or hydronephrosis. Normal renal cortical thickness and texture

No perinephric collection seen.

URINARY BLADDER is of normal contour and wall thickening having no mass/stone.

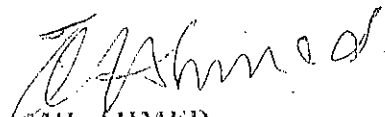
SPLEEN, PANCREASE, AORTA AND PARA AORTIC AREA ARE NORMAL.

No peritoneal / extraperitoneal fluid seen.

No distended or grossly thick walled bowel seen. No basal pleural fluid seen.

IMPRESSION; a. GRADE 2 FATTY LIVER. b. GALLSTONES.

OTHERWISE NORMAL ABDOMENAL AND PELVIC SCAN.


DR. JAMIL AHMED.
MBBS, MCPS[anaesth].

For Appointment ; 03355157664.

ATTESTED

42

Hussain

KIDNEY & GALL STONE HOSPITAL

THE CENTER OF EXCELLENCE IN LITHOTRIPSY

Name: SHAHDAWLAZ	Age/Sex 27 YEARS MALE
Lab.No. 8/9	S.No 30529
Date: 09-03-2017	Ref.By Dr.ZAHID HUSSAIN Sb

CHEMICAL PATHOLOGY REPORT

TEST	RESULT	REFERENCE RANGE	TEST	RESULTS	REFERENCE RANGE
Blood Glucose profile			Renal Profile		
Blood sugar fasting		70-120 mg/dl	B U N		7-20 mg/dl
½ Hr. ABF			Blood Urea		15-42 mg/dl
1 Hr. ABF			Creatinine		0.5-1.4 mg/dl
1 ½ Hr. ABF			Great Clearance		110-140 ml/min.
2 Hr. ABF			S.Cholestrol		150-250 mg/dl
Blood Sugar Random		70-140 mg/dl	Uric Acid		4.0-8.0 mg/dl
Hbs Ag			S. Calcium		8.0-10.5 mg/dl
Anti HCV			s. Triglycerides		60-165 mg/dl
S. Bilirubin		0.1-1.0 mg/dl	Total Liplds		400-1000 mg/dl
SGPT	69	10-40 U/L	BLEEDING TIME	Min Sec	1-8 Minute
Alkaline Phosphates		73-207 U/L	CLOTTING TIME	Min Sec	4-10 Minute

HAEMATOTOLOGY REPORT

TEST	RESULT	REFERNCE RANGE	TEST	RESULTS	REFERNCE RANGE
Hemoglobin	14.7	M.14-18 G/dl F. 12-16 G/dl	Differential count		
TLC	17.3	4000-11000/Cmm	Polymorphs	54	40-75 %
ESR (1 st Hr.)		M 0-10 mm	Lymphocytes	39	20-45 %
Blood Group			Monocytes	04	02-10 %
Rh Factor			Eosinophils	03	01-06 %
Platelet count	352	150-250,000 cmm			

THE GOLD STANDARD IN LITHOTRIPSY IN PAKISTAN

Hussain Kidney Hospital, 77. Ali Block, New Garden Town. Lahore. Opp Barket Market, Nearby Bank of Punjab, Behind Total Petrol Pump. Cell No. 0333 4206197. 0321 3393999. Tel: 042 35863098. 35832277. 35882633. Fax: 042 35882109. E-mail: eswl@brain.net.pk. WWW.hussainkidney.com

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(43)

Equipped with "Siemen's Lithostar Plus of Germany".
Most sophisticated and Effective Lithotripter for E.S.W.L.
(Extracorporeal Shock Wave Lithotripsy)

Hussain
Kidney and Gallstone Hospital
THE CENTRE OF EXCELLENCE IN ESWL

NAME : SHAH DOLA AGE SEX : 27 YEARS
Lab No: 4/29 S. No. 29568
Date: 29-10-2016 Ref. By Dr. ZAHID HUSSAIN

CHEMICAL PATHOLOGY REPORT

TEST	RESULT	REFERENCE RANGE	TEST	RESULT	REFERENCE RANGE
Blood Glucose Profile			Renal Profile		
Blood Sugar Fasting		70-120mg/dl	B.U.N		7-20 mg/dl
1/2 Hr ABF			Blood Urea		15-42 mg/dl
1Hr ABF			S. Creatinine	1.8	05-1.4 mg/dl
1 1/2 Hr ABF			Creat. Clearance		110-140 ml/min
2 Hr ABF			S.Cholestrol		150-250 mg/dl
Blood Sugar Random	147	70-140 mg/dl	Uric Acid		4.0-8.0 mg/dl
Hbs Ag			S. Calcium		8-10.5 mg/dl
Anti HCV			S. Triglycerides		60-165 mg/dl
S. Bilirubin		0.1-1 mg/dl	Total Lipids		400-1000 mg/dl
S.G.P.T		upto 40 u/dl	S. Phosphoros		
Alkaline Phosphatase		73 - 207 u/dl			

HAEMATOLOGY REPORT

TEST	RESULT	REFERENCE RANGE	TEST	RESULT	REFERENCE RANGE
Hemoglobin	14.2	M 14-18 G/dl F 12-16 G/dl	Differential Count		
T.L.C	10800	4000-11000/cmm	Polys	48	40-75%
ESR (1st HR)	18	M 0-100 mm F 0-15 mm	Lymphos	43	20-45%
Platlet	269	150 - 450	Monos	4	02-10%
R.H Factor			Eosinos	5	01-06%

THE GOLD STANDARD IN LITHOTRIPSY IN PAKISTAN

Hussain Kidney Hospital, 77 - Ali Block, New Garden Town, Lahore. Opp. Bazar Market, (Road between TOTAL Petrol Pump & Bank of Punjab). 042-35911185 - 35863098 , 35882633 Fax: 042 - 35882109 Mob: 0333-4206197, 0321-3583733, E-Mail: eswl@brain.net.pk, Website: www.hussainkidney.com

ATTESTED

44



HUSSAIN KIDNEY & GALL STONE HOSPITAL

THE GOLD STANDARD IN LITHOTRIPSY IN PAKISTAN

Equipped with "Siemen's Lithostar Plus of Germany",
Most Sophisticated and Effective Lithotripter for
E.S.W.L. (Extracorporeal Shock Wave Lithotripsy)

Name: Shah Dawlat

Age / Sex: 27 yrs Male

S.No. 29330

Lab No. 3/22

Date: 22-8-16

Ref. By Dr. Dr. Zahid Hussain

CHEMICAL PATHOLOGY REPORT

TEST	RESULTS	REFERENCE RANGE	TEST	RESULTS	REFERENCE RANGE
Blood Glucose Profile			Renal Profile		
Blood sugar fasting		70-120 mg/dl	B.U.N		7-20 mg/dl
½ Hr ABF			Blood Urea		15-42 mg/dl
1Hr ABF			S.Creatinine	0.8	05-1.4 mg/dl
1 ½ Hr ABF			Creat. Clearanc :		110-140 ml/min.
2 Hr ABF			S.Cholesterol		150-250 mg/dl
Blood sugar random	64	70-140 mg/dl	Uric Acid		4.0-8.0 mg/dl
Hbs Ag	Negative		S. Calcium		8-10.5 mg/dl
Anti HCV	Negative		S. Triglycerides		60-165 mg/dl
S. Bilirubin		0.1 - 1 mg/dl	Total Lipids		400-1000 mg/dl
S.G.P.T.		upto 40 u/dl	S.Phosphoros		
Alkaline Phosphatase		73 - 207 u/dl			

HAEMATOLOGY REPORT

TEST	RESULTS	REFERENCE RANGE	TEST	RESULTS	REFERENCE RANGE
Hemoglobin	14.2	M 14-18 GAI F 12-16 GAI	Differential Count		
T.L.C	11.5	4000-11000/cmm	Polys.	47	40-75%
ESR (4 HR)		M 0-10 mm F 0-15 mm	Lymphos	46	20-45%
Blood Group			Monos.	5	02-10%
R.H Factor			Platelets		01-00%

ATTESTED

THE GOLD STANDARD IN LITHOTRIPSY IN PAKISTAN

ILYAS ULTRASOUND



Opposite Gate No. 2 District Headquarter Hospital Bannu

DR. ILYAS HUSSAIN SHAH
M.B.B.S., R.M.P
Ultrasound Specialist

P. Name Shah Ilyas Age/Sex _____

Ref by Dr. _____ Date 14.7.16

LIVER : Normal in size. Moderate diffuse increase in fine echoes in hepatic parenchyma impairing the view of vasculature and parenchyma.
Contours are regular and smooth in outlines. No intra or extra hepatic cholestasis seen.

SPLEEN : Normal in size. No focal lesion seen.

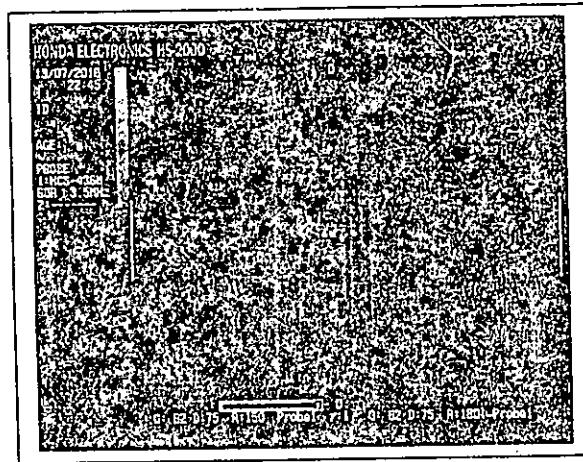
GB : Few small freely mobile stone echoes detected in te lumen. No wall thickening / pericholecystic collection seen.

Pancreas and para aortic regions are normal. Portal vein measure normal in dia.

KIDNEYS : Size, shape and position are normal. No evidence of stone / hydronephrosis. Normal cortical thickness and echogenicity.

U. BLADDER : No stone / wall thickening seen.

No mass, abscess or fluid collection seen in abdomen.



**FATTY LIVER.
SMALL GALL STONES.**

ATTESTED

[Handwritten signature]

46



BASHIR CLINICAL LABORATORY

Near National Bank Railway Road, Bannu

Consultant
Dr. Muhammad Bashir
M.B.B.S. F.C.P.S.
MEDICAL SPECIALIST (Rtd)
D. Clinical Pathologist
D.H.Q. Hospital Bannu.

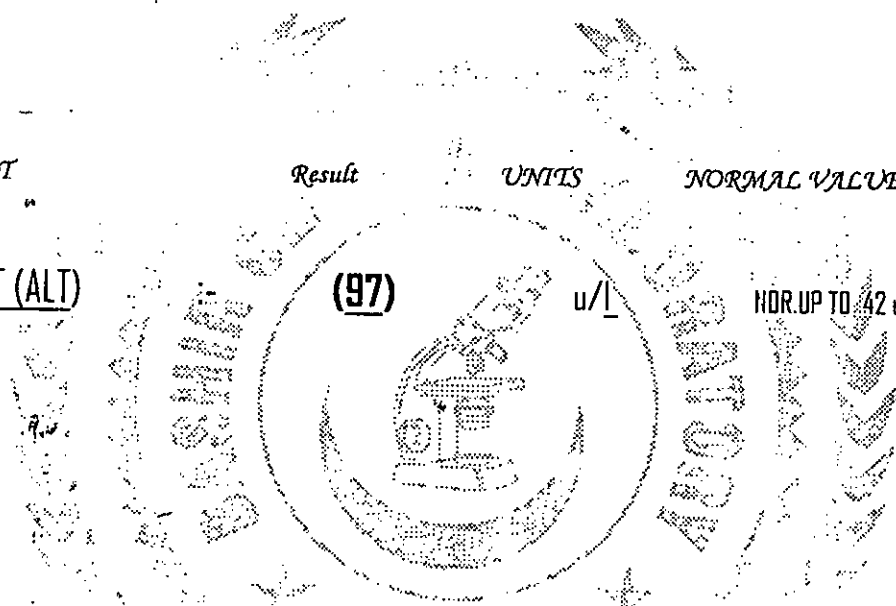
(Regd. Computerized)
Reg No. HRA/500/R Bu/LAB/9

بشیر کلینیکل لیبارٹری
زود پرائیمریشنل بینک ریلوے روڈ بنوں
☎ 0928-660710

Pt. NAME	Shadaullah.	Sex:-M/F
Test Required	SGPT (ALT) Test.	Date:- July 12, 2016
Ref. By	Self	

بشیر کلینیکل لیبارٹری

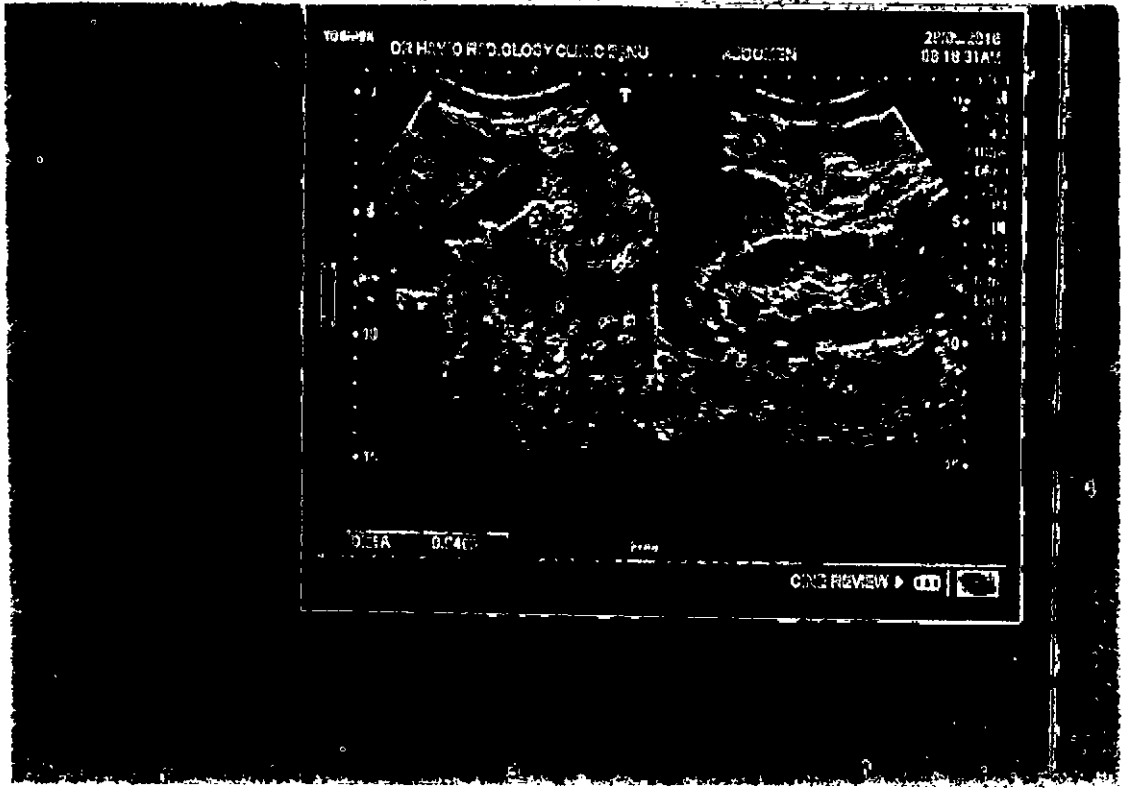
TEST	Result	UNITS	NORMAL VALUES
→ SGPT (ALT)	(97)	u/l	NOR. UP TO 42 u/l



Signature
ATTESTED

In case of any clinical doubt please call laboratory within 24 hrs for free repeat of any one test from this sample.

47



ATTESTED

mission = 200

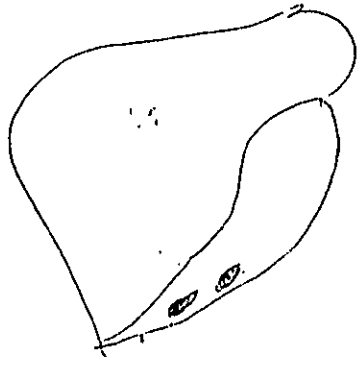
48

ڈاکٹر حمید الزاویہ اینڈ اینڈ اینڈ ریڈیالوجی کلینک

Attendant No: 0334-5322724

کلینک: باغیچہ گٹ پور 2، سڑک پورہ، لاہور، پیچنگ ہسپتال بنوں

سماوات اللہ



→ Two calculi in GB -
larger is 9mm.
No acute inflammation

Rest of the viscera
are — normal

سماوات اللہ
29/5/16
ATTESTED

ڈاکٹر حمید الزاویہ اینڈ اینڈ اینڈ ریڈیالوجی کلینک
لاہور، پیچنگ ہسپتال بنوں

ڈاکٹر حمید اللہ وزیر الزاویہ اینڈ اینڈ اینڈ ریڈیالوجی کلینک
ایم بی بی ایس (پنجاب)، ایم بی بی ایس (ریڈیالوجی) (لاہور) پیچنگ ہسپتال بنوں
خلیفہ گلواز پیچنگ ہسپتال بنوں

SEHER PHARMACY

77-ALTBLOCK NEW GARDEN TOWN LAHORE.

49

Ph: 04235832277

Invoice No: 3,477

Sales Invoice

Date: 09-Mar-17

Reference: SHAH DOLA

Customer: Cash Sales

#	Particulars	Qty	Rate	Amount
1	Urso 500 mg	60.00 NOS	52.50	3,150
2	Plasenzym tab	30.00 NOS	8.90	267
3	Enoxabid 400 mg	30.00 NOS	40.88	1,226
4	Siliver 20 mg	60.00 NOS	6.90	414
5	Zolbi 40 mg capsules	15.00 NOS	17.86	268

Amount In Words. FIVE THOUSAND THREE HUNDRED TWENTY-FIVE

Total: 195.00 5,325

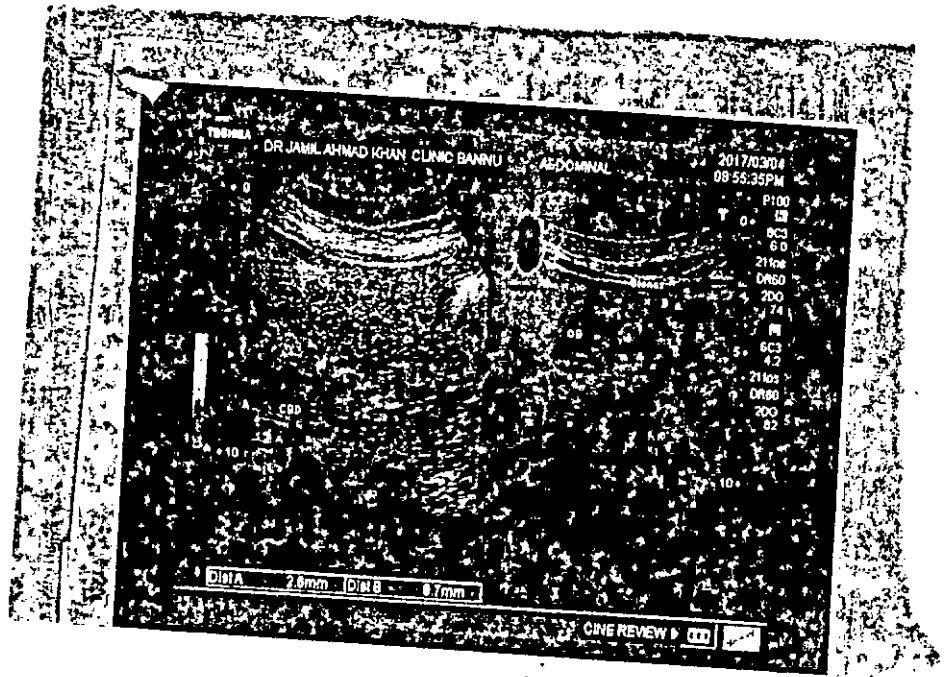
PAID
10 9 MAR 2017

Net Amount: 5,300

Checked By _____

ATTESTED

50



ATTESTED

ڈاکٹر جمیل الشراساؤنڈ کلینک

(SI)

زناتہ ہسپتال روڈ حسین بیگم سڑک، منٹون

PT Name: SHAHDAULAZ.

Age/Sex 27

Ref by: OPR.

Date: March 4, 2017.

ULTRA SOUND ABDOMEN/PELVIS.

LIVER is mildly enlarged having increased echogenicity with uniform texture suggestive of fatty liver...

No focal lesion seen. No intrahepatic biliary or vascular dilatation seen.

GALL BLADDER is of normal size and wall thickening having atleast three stones of 6.7 mm and smaller fundal area-- in

phregeon cape. CBD 2.6 mm and PORTAL VEIN are normal.

KIDNEYS are normal in size and position having no mass / lithiasis or hydronephrosis. Normal renal cortical thickness and texture

No perinephric collection seen.

URINARY BLADDER is of normal contour and wall thickening having no mass/stone.

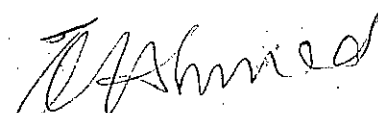
SPLEEN, PANCREAS, AORTA AND PARA AORTIC AREA ARE NORMAL

No peritoneal / extraperitoneal fluid seen.

No distended or grossly thick walled bowel seen. No basal pleural fluid seen.

IMPRESSION; a. GRADE 2 FATTY LIVER. b. GALLSTONES.

OTHERWISE NORMAL ABDOMENAL AND PELVIC SCAN.


DR. JAMIL AHMED.
MBBS, MCPS[anaesth].

For Appointment ; 03355157664.

ATTESTED

52



(53)

سَيِّفُ الْاِثْرَاسَا وَنَدْ كَلِيْنِك

SAIF ULTRASOUND CLINIC

Dr. Saif-ur-Rehman Kamran Marwat
M.B.B.S, (Pesh)



ڈاکٹر سیف الرحمن کامران مروت
الٹراساؤنڈ سپیشلسٹ
ایم بی بی ایس
کلینک :- بالمقابل زانانہ ہسپتال، بنوں

ULTRASOUND SPECIALIST

Opposite Zanana Hospital Bannu. Ph:

Name شاد اللہ Ref by _____ Date 01/10/20

ULTRASOUND FINDINGS

Post cholecystectomy status
Liver, pancreas, upper pre-aortic
region and spleen are normal
CBD & portal vein measure
normal
Kidney are normal in size
& architecture. NO sonohydroneph-
rosis noted
Normal UB.
No ascites Basal pleural effusion.

Impression Normal USound Study
Post cholecystectomy
status

ATTESTED

Annexure E (54)

CHARGE SHEET:

I, QASIM ALI KHAN, District Police Officer, Bannu, as competent authority, hereby charge you Shahdulaz No. 1736 as follows:-

➤ That you have willfully absented yourself from official duty with effect from 13-05-2016 till date which amounts gross misconduct on your part.

2. By reason of the above you appear to be guilty of misconduct under the police Rules 1975 (Amended vide Khyber Pakhtunkhwa gazette Notification, 27 the August 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.

3. You are therefore, directed to submit your defense within 07 days of the receipt of this Charge Sheet to the enquiry officer.

4. Your written defense, if any, should reach to the Enquiry Officer within the specified period, failing which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

5. You are directed to intimate whether you desire to be heard in person.

6. A statement of allegation is enclosed.


(QASIM ALI KHAN) PSP
District Police Officer,
Bannu.

ATTESTED


6
Amir Khan "F" (SS)

STATEMENT OF ALLEGATIONS:

I, QASIM ALI KHAN District Police Officer, Bannu as competent authority, am of the opinion that Shahdulaz No.1736 has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of police rules (Amended vide Khyber Pakhtunkhwa gazette Notification, 27 the August 2014).

SUMMARY OF ALLEGATIONS:

- That he has willfully absented himself from official duty with effect from 13-05-2016 till dated which amounts gross misconduct on his part.
2. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations DSP/Cantt is appointed as Enquiry Officer.
3. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc and findings within (17 days) after the receipt of this order.
4. The accused shall join the proceedings on the date, time and place fixed by the Enquiry Officer.


(QASIM ALI KHAN)PSP
District Police Officer,
Bannu No.

No-119-2016RC dt-15-6-2016

Copies to :-

1. The Enquiry Officer
2. The Accused Officers/Officials.

ATTESTED

Annexure G
56

1736 شادولاز

ORDER:

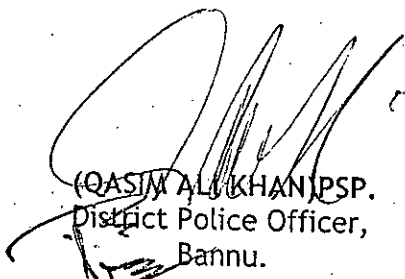
This order of the undersigned will dispose off the departmental proceeding, initiated against accused constable Shadulaz No. 1736, under general proceeding of police rule 1975 (Amended vide Khyber Pakhtunkhwa gazette Notification, 27 the August, 2014) for committing the following commissions/omissions:-

- That he while posted to police lines Bannu willfully absented himself from official duty with effect from 13-05-2016 till date which amounted to gross misconduct on his part.

Mr. Tahir Shah, DSP/Cantt Circle, Bannu conducted proper departmental enquiry into the above charges and submitted his findings vide his office dy No. 307/C dated 20-7-2015, wherein, the Enquiry Officer opined to the effect that the accused officer deliberately avoided to face the departmental proceedings and in the last recommended for proper punishment.

Keeping in view the above, I, QASIM ALI KHAN, District Police Officer, Bannu in exercise of the power vested in me under police rule 1975 (Amended vide Khyber Pakhtunkhwa gazette Notification, 27 the August 2014) hereby dismiss the accused constable Shadulaz No. 1736 from the date of absence i.e 13-05-2016.

OB No. 602
Dated : 10-08 /2016.


(QASIM ALI KHAN) P.S.P.
District Police Officer,
Bannu.

No. 13573-78 /SRC dated Bannu, the 11/8 /2016

Copies for necessary action to:

1. The DSP/HQ. Circle, Bannu.
2. The District Accounts Officer, Bannu
3. The SHO PS Basya Khel.
4. The Pay Officer, Bannu.
5. The OASI, DPO Office, Bannu along with the enquiry file for placing it in the Fjui Missal of concerned official.
6. The accused officer namely Shadulaz S/O Umer Khan R/O Jahangir Lalo Zai PS Basya Khel.

✓
✓
✓
✓
✓
missal

ATTESTED

Departmental Appeal.

Annexure "H" (57)

مختصراً عالی مرتبت جناب والا شان ریجنل پولیس آفیسر صاحب بنوں ریجن بنوں

مدعا: عطائیگی پنشن مراعات عرصہ 2 ماہ 9 سال ملازمت یا بحال فرمائے۔ ملازمت سائل جو عرصہ بیماری کے دوران

جناب DPO صاحب بنوں نے یکطرفہ کارروائی کے ذریعے سائل کو بخوالہ OB نمبر 602

مورخہ 10-06-2016 ملازمت سے Dismiss کیا ہے۔ معیاد اپیل گزرنے پر

نقل حکم عطا کیا۔ جو سراسر ظلم کیا ہے۔

جناب عالی!

سائل آنجناب کے حضور حقیقت پر مبنی عاجزانہ حسب ذیل عرض کرتا ہے۔ یہ کہ سائل مورخہ 09-06-2007 کا بھرتی شدہ

کانٹینبل تھا۔ مورخہ 12-05-2016 کو سخت تکلیف / بیماری میں مبتلا ہوا۔ اس دن پولیس ڈاکٹر نہیں آیا۔ تو سائل مجبوراً

DHQ بنوں ہسپتال گیا۔ OPD ڈاکٹر نے دوائی لکھ کر مکمل Bed Rest کی ہدایت کی گھر پر خود زیر علاج رہا۔ وقتاً فوقتاً ڈاکٹر

صاحب سے معائنہ کرتا رہا۔ لیکن تکلیف / بیماری کی تشخیص نہ ہو سکی اور مجبوراً بالترتیب پشاور اور لاہور جانا پڑا۔ حسین کیڈنی ہسپتال

میں علاج کیا۔ ٹیسٹ کرنے پر پتہ میں پتھری نمودار ہوئی اور وہاں سے علاج شروع کیا۔ جب قدر شفا یابی ملی تو پولیس لائن آیا

لیکن محرر لائن نے کہا کہ DPO صاحب سے اجازت نامہ حاضری لیکر حاضری درج ہوگی۔ جب OHC کے پاس گیا تو اس

نے کہا کہ DPO صاحب میننگ کیلئے پشاور گئے ہے۔ کچھ دنوں کے بعد آجائیں۔ اس دوران مجھے پھر سے تکلیف شروع ہوئی

اور اس دوران میرے خلاف یکطرفہ کارروائی ہوئی اور مجھے DPO صاحب نے Dismiss کیا۔ معیاد اپیل گزرنے پر

نقل میرے حوالے ہوئی۔ میرے علاج و معالجہ کے تمام دستاویزات کے نقول بطور ثبوت لف ہمراہ ہیں۔

لہذا میرے حال پر رحم کیا جائے یا تو مجھے پنشن مراعات کی منظوری دی جائے یا بصورت دیگر میری ملازمت

بحال کی جائے۔ سخت غریب ہو اور کمپرسی کی زندگی سے دوچار ہوں۔

سائل تاحیات دعا گور رہے گا۔

مورخہ 8-8-2016

العارض

EX کانٹینبل شاہ دولاز خان 1736

ساکن جھانگیر لوزئی تھانہ سیہ خیل بنوں

موبائل 0334-8861800

دستخط درخواست کنندہ کانٹینبل شاہ دولاز خان

1736 -

ATTESTED

رحم درخواست

بھنور عالی مرتبت انسپکٹر جنرل آف پولیس صاحب خیبر پختونخواہ پشاور

مدعا: یہ کہ سائل کو جناب ڈی پی او صاحب نے OB نمبر 602 مورخہ 06-10-2016 ملازمت سے ڈس میس کیا ہے۔ جناب RPO صاحب بنوں کو رحم کی اپیل پیش کی۔ مگر انہوں نے ڈی پی او صاحب کی حکم کو بحال رکھتے ہوئے رحم درخواست مسترد فرمائی۔ نقل شامل ہے۔ ملازمت پر بحالی کا خواستگار ہوں۔

جناب عالی!

سائل آجنگاب کے حضور حقیقت پر مبنی عاجزانہ حسب ذیل عرض کرتا ہے۔

کہ سائل ضلع بنوں ریگولر پولیس میں بطور کانسٹیبل ملازم تھا۔ ٹریننگ سنٹر سے باقاعدہ ٹریننگ حاصل کی۔ ٹریننگ سنٹر سے خواندہ لسٹ حاصل کیا۔ لیکن سائل مورخہ 12/05/2016 کو سخت تکلیف / بیماری میں مبتلا ہوا۔ اس دن پولیس ڈاکٹر نہیں آیا۔ تو سائل مجبوراً ڈی ایچ کیو ہسپتال بنوں گیا۔ اپنی ڈی ڈاکٹر نے دوائی لکھ کر کھل بیڈریٹ کی ہدایت کی۔ اور سائل کے ساتھ بیماری کی تمام شواہد موجود ہیں۔ چونکہ سائل اپنے گھر کا واحد خود کفیل ہے اور بوڑھے ماں باپ کا ایکوٹا سہارا ہے۔ غریب گھرانے سے تعلق رکھتا ہے۔ تعلیم یافتہ ہونے کے ساتھ ساتھ ٹریننگ شدہ کانسٹیبل ہے۔ قوم و ملک کی خدمت کا جذبہ رکھتا ہے۔ سائل کی ماضی کی ریکارڈ صاف سترا ہے۔ اور آئندہ ڈیوٹی میں اپنے افسران بالا کو کسی قسم کی شکایت کا موقع نہیں دوں گا۔

بذریعہ درخواست عاجزانہ استدعا ہے کہ سائل کو دوبارہ کانسٹیبل یا سلیکشن گریڈ بحال کرنے کا حکم فرمایا جاوے۔

سائل تازیت دعا گو رہے گا۔

مورخہ: 15/11/2021

العارض

EX کانسٹیبل شاہ دولاز خان 1736

ساکن جہانگیر للوزئی تھانہ بسپہ خیل بنوں

رابطہ نمبر: 03348861826

ATTESTED



Final order

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. S/ 11375 /21 dated Peshawar the 14/03 /2021.

59

To: The Regional Police Officer,
Bannu.

Subject: APPEAL.

Memo:

Please refer to your office Memo! No. 737/EC, dated 01.03.2021.

The Competent Authority has examined in the light of Police Rule 16.32 and filed the mercy petition submitted by Ex-FC Shadulaz No. 1736 of Bannu against the punishment of dismissal from service awarded by District Police Officer, Bannu vide OB. No. 602, dated 10.08.2016, being badly time barred.

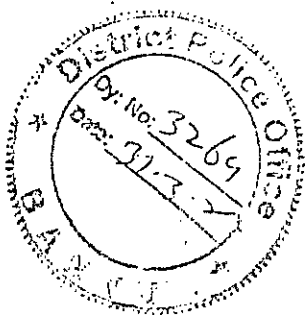
The applicant may please be informed accordingly.

(SYED ANIS-UL-HASSAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

1087 EC
30-3-2021
DR - Bannu
Memo
2012 dated 3-21

15/3
EC
26/3/21

ATTESTED



SRC

Job n/9

1345
عزیز شادولاز کے لیے
103348861336
08/4/2021

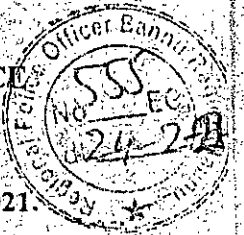
District Police Officer

3/3

08/4/21



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.



No. S/ 547 /21, dated Peshawar the 17/02 2021.

To: The Regional Police Officer,
Bannu.

Subject: APPEAL.

Memo:

Ex-Constable Shadulaz No. 1736 of Bannu district Police has preferred application to the Worthy IGP/Khyber Pakhtunkhwa for reinstatement in service.

In order to proceed further in the matter, a copy of his appeal rejection order may be sent to this office, please.

(SYED ANIS-UL-HASSAN)

Registrar,

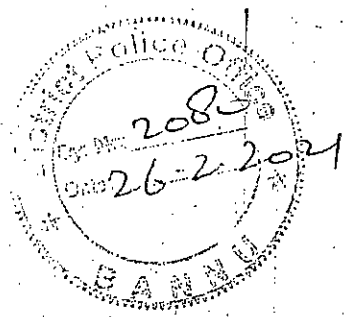
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. 638 EC
OL 25/2 124.

DPO-Bannu No
I wish the requisite
documents, please.

EC
Amalika
RPO Bannu Region
24/2/21

SRE
For 2/19
District Police Officer
BANNU
25-2



ATTESTED

از دفتر ڈی ایس پی کینٹ ضلع بنوں

بخدمت جناب ڈسٹرکٹ پولیس آفیسر بنوں

نمبر: 3071 مورخہ 20/07/2016

فائل رپورٹ

عنوان: انکوائری برخلاف کنشیل شاہ دولازنمبر 1736 متعینہ پولیس لائن۔

الزام: " آپ کنشیل غیر حاضر باش اور بحوالہ مد 84 روز نامچہ 13-05-016 سے بدستور غیر حاضر چلا آ رہا ہے "

☆ اندریں سلسلہ انکوائری ہذا کے سلسلے میں کنشیل شاہ دولازنمبر 1736 پولیس لائن کو بذریعہ پروانہ جات پرانہ نمبر 272/C

مورخہ 16-06-016، 282/C مورخہ 23-06-016، 291/C مورخہ 28-06-016، 292/C مورخہ 01-7-016

، 295/C مورخہ 05-07-016 نوٹس نمبر 296/C مورخہ 13-07-016 بذریعہ کنٹرول روم طلب کیا گیا۔ مگر مذکورہ کنشیل دید

دانستہ طور پر حاضر ہونے سے قاصر رہا۔

☆ انکوائری ہذا میں محرر پولیس لائن کو طلب کیا گیا۔ جس نے اپنے بیان میں یہ وضاحت کی۔ کہ کنشیل شاہ دولازنمبر 1736

بحوالہ نمبر 84 روز نامچہ 13-05-016 سے بدستور غیر حاضر ہے۔ جنگلی حاضری کی کوئی امید نہیں ہے۔ مذکورہ کے خلاف درخواست

بندش تنخواہ قلمد بوساطت آفسران بالا بھیجوا یا گیا ہے۔ مذکورہ کنشیل غیر حاضر باش ہے۔

دائرہ انکوائری آفیسر:

☆ بار بار پروانہ جات نمبر

(i) 272/C مورخہ 16-06-016

(ii) 282/C مورخہ 23-06-016

(iii) 291/C مورخہ 28-06-016

(iv) 292/C مورخہ 01-07-016

(v) 295/C مورخہ 05-07-016 بذریعہ کنٹرول روم مذکور کنشیل کو دفتر ہذا طلب کیا گیا۔ مگر مذکور کنشیل من E.O کو

دید دانستہ طور پر حاضر نہیں ہوتا۔

☆ آخری بار بذریعہ نوٹس نمبر 296/C مورخہ 13-07-016 مقامی تھانہ بذریعہ SHO تھانہ سیہ خیل کنشیل مذکور

شاہ دولازنمبر 1736 والد عمر خان سکٹہ جہانگیر للوزئی سورانی تھانہ سیہ خیل طلب کیا گیا۔ جو نوٹس اس نے بذات خود نوٹ کیا ہے۔ مگر پھر

بھی من انکوائری آفیسر کو تصدق پیش نہ ہوا۔

☆ لہذا کنشیل مذکور کو مناسب سزا دینے کی سفارش کی جاتی ہے۔

ڈی ایس پی کینٹ، بنوں

Handwritten signature

ATTACHED

1 -14-
Annexure 2 (62)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 266/2017

Date of Institution ... 20.03.2017

Date of Decision ... 08.01.2018



Muhammad Umar Ex-Constable No. 273 of District Police Hangu.
... (Appellant)

VERSUS

1. The Deputy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
and 2 other. ... (Respondents)

MR. UZMA SYED,
Advocate --- For appellant.

MR. MUHAMMAD RIAZ PAINDA KHIEL,
Assistant Advocate General --- For respondents.

MR. AHMAD HASSAN, .. MEMBER (Executive)
MR. MUHAMMAD HAMID MUGHAL, ... MEMBER (Judicial)


JUDGMENT

AHMAD HASSAN, MEMBER.- Arguments of the learned counsel for the
parties heard and record perused.

FACTS

2. The brief facts are that the appellant was serving as Constable. Disciplinary proceedings were initiated against the appellant and upon culmination major penalty of dismissal was imposed on him vide impugned order dated 28.05.2011. That he preferred departmental appeal which was rejected on 26.06.2011 and was not communicated to the appellant. When he got the knowledge preferred petition under Rule-11-A of Police Rules which was also rejected on 21.02.2017, hence, the instant service appeal on 20.30.2017.

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

ATTESTED

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instant

ARGUMENTS

3. Learned counsel for the appellant argued that on account of absence from duty disciplinary proceedings were initiated and upon culmination major penalty of dismissal from service was imposed vide impugned order dated 26.06.2011. Prescribed procedure laid down in the rules was not followed in the appeal in hand and as such the appellant was condemned unheard. Absence from duty was not deliberate and intentional but circumstances were beyond his control. Statements of witnesses were not recorded nor the appellant was afforded an opportunity to cross examining the witnesses. Impugned order was passed with retrospective effect which is void ab-initio.

4. On the other hand learned Deputy District Attorney General argued that all codal formalities were observed before passing the impugned order. He was treated according to law and rules, hence, there is no illegality in the said order. The appeal is not maintainable and be dismissed.

CONCLUSION.

5. Without touching the merits of the case the impugned order was passed with retrospective effect, hence, the same is illegal, void ab-initio and not sustainable in the eyes of law.

6. As a sequel to above, the appeal is accepted and the impugned order is set aside. The intervening period may be treated as leave without pay. However, the respondents are at liberty to conduct de-novo enquiry within a period of 90 days after receipt of this Judgment. In case the de-novo enquiry is conducted then the issue of payment of back benefits shall be subject to outcome of the de-novo

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal.

ATTESTED

84

proceedings. Parties are left to bear their own costs. File be consigned to the record room.

S.D

(MUHAMMAD HAMID MUGHAL)
MEMBER

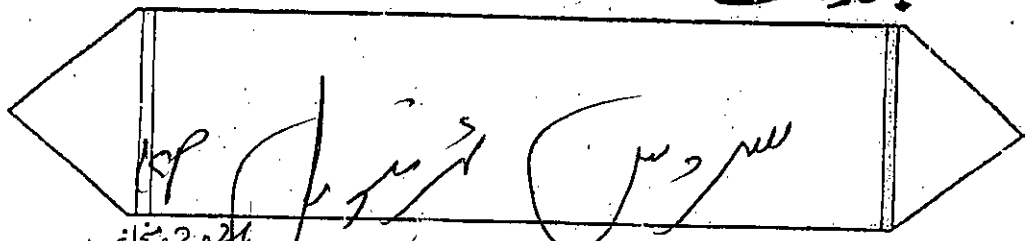
S.D
(AHMAD HASSAN)
MEMBER

ANNOUNCED
08.01.2018

Certified to be true copy
MEMBER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

ATTESTED

بجدرالت



2021ء مخائب

مشاورہ دراز بنام حکومت

مورخہ
مقدمہ
دعویٰ
م

باعث تحریر آئنگہ

مقدمہ سندرجہ عدالت بالا میں اپنی طرف سے واسطے پیروی وجواب دہی وکل کاروائی متعلقہ
 آج مقام _____ کیلئے مجلس علماء پاکستان کی طرف سے
 مقررہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو راضی نامہ کرے۔ یہ و تقرر تالیف ہ فیصلہ برحلاف دیئے جواب دہی اور اقبال دعویٰ اور
 باسورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا سہاقت
 پر واختم منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہر جائز التوائے مقدمہ کے سبب سے ہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

ATTESTED

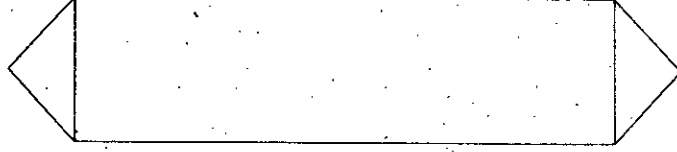
2021 April 24
 2021 April 24
 2021 April 24

Attested & accepted by
 Inayatullah
 Adv
 PGC

24/4/2021
 Inayatullah
 Adv
 PGC
 ULM (UK)

تعداد دول

بعدالت ضامہ - ۲۰۲۱ء میں فیڈریشن میں لٹیا



اعداد

2021ء پنجاب

تسامہ میلان بنام لیس

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

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

آن مقام لیس میں کیلئے نامہ جان

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے و ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھد یا کہ سندر ہے۔

2021ء

ماہ جولائی

۲۰۲۱ء

المرقوم

العبد گواہ العبد

کے لئے منظور ہے۔

مقام

لیٹیا
Accepted & Accepted

Handwritten signature

12-1-22

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No.5199/2021

Shah Dawlaz Khan s/o Umar Khan Constable

Belt No.1736

Appellant

Versus

The Regional Police Officer, Bannu Region, Bannu and others.

..... Respondents

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DEPONENT

11101-1483421-1

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No.5199/2021

Shah Dawlaz Khan s/o Umar Khan Constable

Belt No.1736

Appellant

Versus

The Regional Police Officer, Bannu Region, Bannu, and others.

..... Respondents

PARA WISE COMMENTS/REPLY BY RESPONDENTS NO.1, 2 & 3

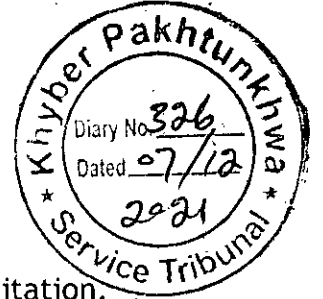
Respectfully Sheweth

Preliminary Objections

1. That the appeal of the appellant is badly barred by law and limitation.
2. That the appeal is not maintainable in its present form.
3. That the appellant has concealed the actual facts from this Honorable Tribunal.
4. That the appeal is bad in law due to mis-joinder and non-joinder of necessary parties.
5. That the appellant has approached the Honourable Tribunal with unclean hands.
6. That the appellant has got no cause of action and locus-standi to file the instant appeal.
7. That the appellant has been estopped by his own conduct.

OBJECTIONS ON FACTS:

1. Pertains to service record of appellant.
2. Incorrect. As per the appellant's clinical record, the appellant was ill but according to Police Rules, the applicant must grant leave application suggested by physicians but the applicant has no such documents in which the physician suggested medical leave for long rest nor he submitted any application on record to his high ups. Moreover, as per Naqalmad No.84 dated 13.05.2021, the applicant did not come back to his posting place after the check-up.
3. Incorrect. Proper charge sheet with statement of allegations were issued to the appellant. The I.O. has issued notices time and again through lines, control



room, etc. but in last parwana (notice) 296/C 13.07.2016 through SHO local police station Basia Khel which was received by the appellant himself but he did not appear before I.O for inquiry proceedings within the stipulated period.

4. Incorrect. Proper departmental inquiry was conducted by DSP Cantt; Bannu. He was summoned time and again to appear before the I.O for inquiry proceedings, but he badly failed to do so. Moharrer Police Line was also summoned by the I.O who narrated that Constable Shah Dawlaz Khan No. 1736 has been absent vide Mad No.84 dated 13.05.2016 and there is no chance that he may come back to join duty again. Resultantly, he was dismissed from service.
5. Pertains to record. Departmental appeal of appellant was found meritless and not based on cogent reasons, therefore, rejected by the competent authority.
6. DSP Cantt; has submitted final report in the inquiry wherein appellant has been found guilty of willful absence from duty without leave.
7. Appeal of appellant is not maintainable and based on cogent grounds, liable to be dismissed.

OBJECTIONS ON GROUNDS

- a) Incorrect. The orders issued by the Respondent Department are quite legal based on facts, justice, and in accordance with law/rules.
- b) Incorrect. Appellant has willfully absented from official duty as well as from inquiry proceeding and charges have been established then awarded appropriate punishment in accordance with law/rules.
- c) Incorrect. Proper charge sheet with statement of allegations was issued to the appellant and departmental inquiry was conducted by DSP Cantt; Bannu; several notices were issued on different dates but he badly failed to report for duty.
- d) Incorrect. Reply has already been given in the above para.
- e) Incorrect. The order issued is in accordance with law/rules. He was dismissed from service after fulfillment of all codal and legal requirements under the rules.
- f) Incorrect. Proper charge sheet with summary of allegations was issued to appellant. He was summoned time and again for inquiry proceedings but he badly failed to do so.

- g) Incorrect. Reply has already been given in the above para.
- h) Incorrect. All the opportunities of defense/hearing were provided to appellant but he did not avail voluntarily.
- i) Incorrect. The facts & circumstances of appellant's case are differed from other.
- j) The Respondents department may kindly be allowed to advance any other grounds & material as evidence at the time of arguments.

PRAYER:

In view of the above replies, it is most humbly prayed that the appeal of the appellant being badly barred by limitations, may kindly be dismissed with cost, please.


**District Police Officer,
Bannu
(Respondent No.3)**


**Regional Police Officer,
Bannu Region, Bannu
(Respondent No.2)**


**Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar
(Respondent No.1)**

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No.5199/2021

Shah Dawlaz Khan s/o Umar Khan Constable

Belt No.1736

Appellant

Versus

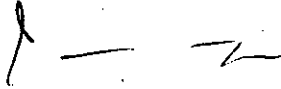
The Regional Police Officer, Bannu Region, Bannu and others.

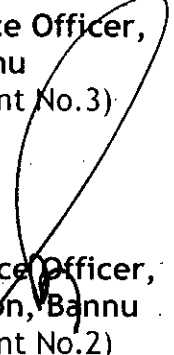
..... Respondents

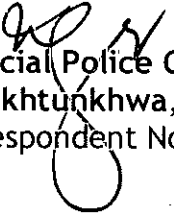
AUTHORITY LETTER.

Mr. Muhammad Farooq Khan, DSP Legal is hereby authorized to appear before The Service Tribunal Khyber Pakhtunkhwa Peshawar on behalf of the undersigned in the above cited case.

He is authorized to submit and sign all documents pertaining to the present appeal.


District Police Officer,
Bannu
(Respondent No.3)


Regional Police Officer,
Bannu Region, Bannu
(Respondent No.2)


Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar
(Respondent No.1)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No.5199/2021

Shah Dawlaz Khan s/o Umar Khan Constable

Belt No.1736

Appellant

Versus

The Regional Police Officer, Bannu Region, Bannu and others.

..... Respondents

AFFIDAVIT

I, **Muhammad Farooq Khan**, DSP Legal representative for Respondent Nos. 1, 2 & 3, do hereby solemnly affirm and declare that the contents of the accompanying comments submitted by me are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.



DEPONENT

11101-1483421-1

ATTESTED

