


FORM OF ORDER SHEET

Court of _____

Appeal No. 1753/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/08/2023	The appeal of Mst. Shehnaz is presented today by Mr. Javed Ali Ghani Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on
		31-08-2023
		By the order of Chairman
		 REGISTRAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

1753
S.A. No. _____/2023

Mst. ShehnazAppellant

Versus


Additional Inspector General (HQr) of Police, KP,
Peshawar and others Respondents

I N D E X


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Dated: 26-8-23


Appellant

Through


Javed Ali Ghani
Advocate Supreme Court.

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

S.A. No. 1753 /2023 .

Date 7209
Dated 28/8/2023

Mst. Shehriaz d/o Sharif Gul
P.O. Prang Mohallah Qudrat Abad, Mojokey, Charsadda
Presently Sultan Colony No.2, Dalazak Road, Peshawar
Ex-Computer Operator (BPS-16) CCPO Office
PeshawarAppellant

Versus

- 1) Additional Inspector General (HQR) of Police, KP, Peshawar.
- 2) Inspector General of Police, KP, Peshawar.
- 3) Deputy Inspector General of Police, KP, Peshawar.
- 4) Director Forensic Science Laboratory. Khyber Pakhtunkhwa, Peshawar
- 5) Capital City Police Officer, Peshawar Respondents

SERVICE APPEAL U/S 4 OF THE SERVICES TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 18.07.2023 VIDE WHICH THE APPELLANT WAS AWARDED MAJOR PUNISHMENT OF REMOVAL FROM SERVICE UNDER E&D RULES, 2011 AND APPELLANT FILED REPRESENTATION ON 03.08.2023 VIDE DIARY NO.5120 WHEREBY THE APPELLANT WAS SERVED WITH A NOTICE DATED 07.08.2023 AND 16.08.2023 FOR THE EXECUTION OF ORDER DATED 18.07.2023.

Respectfully submitted;

- 1) That the appellant was appointed as Computer Operator in worthy Department on the recommendation of the Public Service Commission of Khyber Pakhtunkhwa in year 18.07.2017.

- 2) That the appellant as such performing her duties with dedication, honesty, due diligence to the entire satisfaction of her immediate seniors without any complaint with full zeal since her induction.
- 3) That a show cause notice was issued to the appellant and an inquiry was conducted without fulfilling mandatory procedure with the respondent department/ competent authority.
- 4) That after completion of inquiry the appellant was awarded the major penalty vide order dated 18.07.2023 and received by the appellant on 27.07.2023 and was removed from service.
- 5) That the appellant filed departmental appeal on 03.08.2023 during the pendency of said appeal the appellant was served notice dated 07.08.2023 and 16.08.2023 for the execution of the order dated 18.07.2023.
- 6) That the appellant approached the respondents that as her appeal dated 03.08.2023, is pending before the competent authority/ respondents and the notice dated 07.08.2023 and 16.08.2023 may please be withdrawn, but the appellant was orally told that her appeal is decided, what's why the instant notices have been served upon the appellant.
- 7) That the appellant being aggrieved from the above-said impugned orders having no other efficacious and proper remedy against the above noted order, hence approaches before Hon'ble Tribunal.

GROUNDS:

- 8) That order of removal from service by the competent authority, is illegal and against the law, facts on against the record of the case and is not maintainable.
- 9) That the order of respondent department is based on personal grudges biased one and is not sustainable in the eyes of law.

- 10) That the order for inquiry so issued by the competent authority is not according to law, rules and policy and the same is needs to be reversed.
- 11) That the respondent-department has not taken into consideration the mandatory procedure in case of absentia no prior notice to the alleged inquiry, show cause and subsequent proceedings were served upon the appellant and unilaterally taken all the steps and actions which is violative of law.
- 12) That in the instant proceedings the transfer order so carried out by the respondents dated 24.10.2022 and other proceedings were not considered by the department as the appellant was having her basic rights for the same.
- 13) That the medical certificates/ documents and facts so narrated by the appellant was not considered while delivering findings for her removal and awarding major penalty is against the basic norms of natural justice.
- 14) That the competent authority so issued the alleged impugned order is not according to the mandate and authority and the result of jurisdiction which was not vested under the law and respondents have traveled beyond their jurisdiction to pass removal from service of the appellant.
- 15) That the appellant so found guilty in the alleged inquiry no mandatory and necessary procedure was adopted and the appellant was illegally declared found guilty of misconduct.
- 16) That the appellant while having her authorized leave under the rules, policy and regulations were not considered which are available on the face of record duly communicated in time for consideration, the same we ignored which are the necessary ingredients for the determination of such like guilt.

- 17) That the appellant was not associated in anyway with the inquiry so conducted by the department and was condemned unheard, which is against the law and justice.
- 18) That the instant findings and subsequent removal in the charge sheet and inquiry is against the established norms of law and natural justice and are not maintainable in the eyes of law.
- 19) That the departmental appeal before the competent authority and its subsequent rejection/ dismissal/ service notice is illegal, against law and is not sustainable according to the law and rules on the subject.

Keeping in view, what has been stated above, it is, therefore, humbly requested the impugned order of removal from service dated 18.07.2023 and subsequent notices dated 07.08.2023 and 16.08.2023 under Form PR-25-2-1 (1) u/s 160/175 Cr.P.C. may kindly be set aside and the appellant may please be reinstated in service with all arrears and consequential back benefits.

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

Shahid
Appellant

Through

Javed Ali Ghani
Javed Ali Ghani
Advocate Supreme Court.

CERTIFICATE:

Certified as per information furnished by my client that no such like appeal has earlier been filed before this Hon'ble Tribunal.

Advocate
Ali

ATTESTED
25/8/23

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

S.A. No. _____/2023

Mst. Shehnaz Appellant
Versus
Additional Inspector General (HQr) of Police, KP,
Peshawar and others Respondents

AFFIDAVIT

I, Mst. Shehnaz d/o Sharif Gul R/o P.O. Prang Mohallah Qudrat Abad, Mojokey, Charsadda Presently Sultan Colony No.2, Dalazak Road, Peshawar Ex-Computer Operator (BPS-16) CCPO Office Peshawar (appellant), do hereby affirm and declare that the contents of the accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this hon'ble tribunal.

Shehnaz

Deponent

CNIC No. 17101-7070437-0

ATTESTED
[Signature]
25/8/2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

S.A. No. _____/2023

Mst. ShehnazAppellant

Versus

Additional Inspector General (HQr) of Police, KP,
Peshawar and others.....Respondents

APPLICATION FOR SUSPENSION OF
IMPUGNED ORDER DATED 18.07.2023
AND WITHDRAWAL OF SUBSEQUENT
NOTICES DATED 07.08.2023 AND
16.08.2023 AND TO MAINTAIN STATUS
QUO TILL FINAL DECISION OF THE
ACCOMPANYING SERVICE APPEAL.

Respectfully Sheweth;

- 1) That the above titled appeal is being filed before this Hon'ble Tribunal wherein no date has yet been fixed.
- 2) That grounds of main appeal may kindly be considered as part and parcel of this application.
- 3) That a prima facie an arguable case exists in favour of appellant and is sanguine about its success.
- 4) That balance of convenience also lies in favour of petitioner/ appellant.

- 5) That if the relief as prayed for in the heading of application is not granted, the petitioner/ appellant will suffer an irreparable loss.

It is, therefore, humbly prayed that on acceptance of this application, operation of the impugned order dated 18.07.2023 may kindly be suspended and subsequent notices dated 07.08.2023 and 16.08.2023 may kindly be withdraw by maintaining status quo till final decision of the accompanying service appeal.

Shamir

Appellant

Through

Javed Ali Ghani

Javed Ali Ghani
Advocate Supreme Court.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALPESHAWAR

S.A. No. _____/2023

Mst. Shehnaz Appellant

Versus

Additional Inspector General (HQr) of Police, KP,
Peshawar and others RespondentsAFFIDAVIT

I, Mst. Shehnaz d/o Sharif Gul R/o P.O. Prang Mohallah Quadrat Abad, Mojokey, Charsadda Presently Sultan Colony No.2, Dalazak Road, Peshawar Ex-Computer Operator (BPS-16) CCPO Office Peshawar (appellant), do hereby affirm and declare that the contents of the accompanying Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable tribunal.

Shehnaz

Deponent

CNIC No: 17101-7070437-0

25/8/23

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

S.A. No. _____/2023.

Mst. Shehnaz Appellant

Versus

Additional Inspector General (HQr) of Police, KP.
Peshawar and others Respondents

ADDRESSES OF THE PARTIES

APPELLANT:


Mst. Shehnaz d/o Sharif Gul
P.O. Prang Mohallah Qudrat Abad, Mojokey, Charsadda
Presently Sultan Colony No.2, Dalazak Road, Peshawar
Ex-Computer Operator (BPS-16) CCPO Office
Peshawar

RESPONDENTS:

- 1) Additional Inspector General (HQr) of Police, KP, Peshawar.
- 2) Inspector General of Police, KP, Peshawar.
- 3) Deputy Inspector General of Police, KP, Peshawar.
- 4) Director Forensic Science Laboratory, Khyber Pakhtunkhwa,
Peshawar
- 5) Capital City Police Officer, Peshawar


Appellant

Through


Javed Ali Ghani
Advocate Supreme Court.



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR
Ph: 091-9210545 Fax: 091-9210927
E-Mail: - OSEstabV@gmail.com

No. 3906-13 /E-V

Dated, Peshawar the 18/7 July, 2017

ORDER

On appointment as Computer Operator (BPS-16) in Police Department, Miss. Shehnaz d/o Sharif Gul of District Charsadda is hereby transferred and posted in the office of the Senior Superintendent of Police, Traffic, Peshawar with immediate effect until further orders.

Besides, Prior to draw the salary of the above mentioned Computer Operator the SSP Traffic, Peshawar is requested to carry out her verification of character & antecedents by Special Branch Khyber Pakhtunkhwa, Peshawar and Academic Testimonial from the concerned Universities/Board of the above named newly appointee accordingly.

Sd/-
Muhammad Ashraf Noor, PSP
Addl: IGP/HQrs:
For Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. & date even.

Copy forwarded to the:-

1. Addl: Inspector General of Police HQrs: Khyber Pakhtunkhwa, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. PA to Deputy Inspector General of Police HQrs: Khyber Pakhtunkhwa, Peshawar.
4. Capital City Police Officer, Peshawar
5. Senior Superintendent of Police, Traffic, Peshawar.
6. Registrar CPO, Peshawar.
7. Office Supdt: Secret CPO Peshawar.
8. In-Charge Central Registry Cell CPO, Peshawar.

(MUHAMMAD ALI KHAN) PSP
DIG/HQrs:
For Inspector General of Police
Khyber Pakhtunkhwa,
Peshawar



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Forensic Science Laboratory
29, Sector B-1 Phase-V Hayatabad
Khyber Pakhtunkhwa Peshawar
Tel. 091-9217394 / Fax. 091-9217251
No 576 /FSL Dated 16/05/2023

Ms. Shahnaz,
Computer Operator,
FSL Peshawar.

Subject: SHOW CAUSE NOTICE

WHEREAS, you Miss Shahnaz Computer Operator were posted to FSL vide Order No. 11486-89/EC/Inv, dated 24.10.2022.


You had not submitted your arrival report at FSL Peshawar and submitted an application for cancellation of the above posting order on 11.11.2022. Subsequently, a note sheet in this regard has been forwarded by the undersigned to the quarter concerned for transfer you back to CPO.

The competent authority had regretted the cancellation of your transfer order on 15.11.2022. Therefore you were required to submit arrival report at FSL Peshawar immediately.

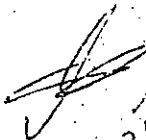
You have willfully absented yourself from lawful duty for a long time (w.e.f 01.11.2022 to 15.05.2023) without any prior permission or approval from the competent authority.

In light of the above allegation you appear to be guilty of misconduct and explain as to why disciplinary action should not be taken against you under Khyber Pakhtunkhwa E&D Rules as amended in 2014.

Your written reply should reach to this office within 07 seven days positively. In case of failure it shall be presumed that you have no defense to offer and an ex-parte action will be taken against you.


Director
Forensic Science Laboratory
Khyber Pakhtunkhwa
Peshawar

Received



17/5

SUBJECT: REPLY TO THE SHOW CAUSE NOTICE NO.576/FSL DATED 16-05-2023.

Respected Sir,

Respondent very humbly submitted the following facts and reply to the show cause notice issued by W/Director, Forensic Science Laboratory Khyber Pakhtunkhwa Peshawar vide No.576/FSL dated 16-05-2023.

I was transferred from Investigation Unit CPO to FSL Peshawar vide order No. 11486-89/EC/Inv. dated 24-10-2022 (attached), during this period I was already on maternity leave as my delivery was done on x-section process, after x-section I suffered from severe UTI (urinary tract infection). Due to this reason I report for duty at FSL Peshawar after 14 days of my transfer. Upon arrival I appeared before the W/Director FSL and informed verbally about my medical condition & also request and submit application on 11-11-2022 for cancellation of my transfer order.

In this regard the W/Director FSL submitted Note Sheet on 11-11-2022 to Addl.-IGP/Inv. CPO for the cancellation of my transfer order, but the competent authority had regretted the cancellation order on 15.11.2022. Meanwhile I was on bed rest for two months upon the advice of doctor (medical documents attached). In January 2023 I was got pregnant and the doctor advised 2/2 months bed rest due to medical complication and previous miscarriage incident record which was occurred due to traveling (medical record attached).

When I received call from FSL Peshawar on 16-05-2023 to report the office and join duty. I report back at FSL Peshawar on 16-05-2023. As I stated above that I was got pregnant from January 2023 and the doctor advise to avoid travel for the safety of your's pregnancy (advise of the doctor attached).

Due to above mentioned facts, it is therefore requested that I may kindly be humbly treated and exonerate me from the allegation mentioned in show cause notice please.

(SHEHNAZ)
Computer Operator
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar



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Forensic Science Laboratory
29, Sector B-1, Phase-V, Hayatabad,
Khyber Pakhtunkhwa, Peshawar.
Tel. Tel. 091-9217394/Fax. 091-9217251
No. 755 /FSL, Dated: 20/06/2023

MS. SHAHNAZ
Computer Operator
Questioned Documents Section,
FSL, Peshawar.


Subject: SHOW CAUSE NOTICE.

WHEREAS, you Miss Shahnaz Computer Operator of Questioned Document Section FSL Peshawar have arrived late and absented yourself from lawful duty as follows:

Date	Absence (Days)	Late arrivals
31.05.2023	01	--
01.06.2023	01	--
02.06.2023	--	2 hours, 8 minutes.
05.06.2023	01	--
06.06.2023	--	2 hours, 30 minutes
07.06.2023	--	1 hour, 25 minutes
12.06.2023	-	3 hours.
13.06.2023	01	--
14.06.2023	-	2 hours, 5 minutes
16.06.2023	01	--
19.06.2023	01	--
20.06.2023	--	2 hours, 45 minutes

This amounts to gross misconduct, indiscipline and distrust towards government duty on your part and liable to be punished under Khyber Pakhtunkhwa E&D Rules (amended in 2014).

Therefore, you are directed to explain your position in written within three days positively, otherwise departmental proceedings shall be initiated against you.


DIRECTOR
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

حوالہ جمعہ انگریزی پری 755/FSL "حصہ نمبر 100" سے پہلے کہ فروری

بیمار اور ڈاکٹر صاحب سے سفر کے بارے میں پتہ چلا ہے۔

صدر کونسل میں یہ رپورٹیں نہیں لکھی گئیں ہیں۔

یہ بین الاقوامی لیٹ آئی ہیں۔ تو یہ بھی لکھ کر یا استفسار

کے ساتھ لکھیں۔ اگرچہ درخواست دہندگان کو قبول نہیں کر سکتے۔

اس کے ساتھ ساتھ ان کے پاس 50 ہزار روپے ہیں۔ صدر کونسل کے پاس

انگریزی پری 755/FSL اور



FINAL SHOW CAUSE NOTICE

WHEREAS, you, Ms. Shahnaz Computer Operator of FSL Peshawar committed the gross misconduct, as defined in Efficiency and Discipline Rules, 2011. The following is the statement of allegations:


1. That you were posted to FSL Peshawar vide order No.11486-89/EC/Inv, dated 24.10.2022.
2. That you had not submitted your arrival report at FSL Peshawar and submitted an application for cancellation of the above posting order on 11.11.2022. Subsequently, a note in this regard was forwarded by the undersigned to the quarter concerned for your repatriation back to CPO.
3. That the competent authority regretted your repatriation request on 15.11.2022. Consequently, you were required to submit arrival report at the FSL Peshawar immediately after your repatriation was regretted.
4. You had willfully absented yourself from lawful duty for a long time (w.e.f 01.11.2022 to 15.05.2023) without any prior permission or approval from the competent authority or submission of any plausible reason for your absence.

Resultantly you were issued charge sheet with summary of allegations. A Departmental Enquiry Committee consisting of Mr. Muhammad Bilal Incharge Narcotics Section, Mr. Zahoor Islam Incharge Chemical Section and Mr. Safdar Ali Shah Incharge FPB Section FSL was constituted to conduct Departmental Enquiry into the matter.

WHEREAS, the Enquiry Committee finalized the enquiry proceedings by giving you full opportunity of defense as well as cross examination. All the statements have been recorded by fulfilling all the codal formalities. Consequent upon completion of enquiry proceedings, the Enquiry Committee has communicated its findings to the undersigned.

WHEREAS, going through the findings and recommendation of the Enquiry Committee, material placed on record and other relevant papers including your defense before the Enquiry Committee, I Waqar Ahmad, PSP, Director FSL, Khyber Pakhtunkhwa, Peshawar issue you this Final Show Cause Notice to offer you full opportunity to come up with satisfactory reply supported by evidence in your defense.

You are therefore, required to submit your reply to this Final Show Cause Notice within Seven Days of the receipt of this notice.


(WAQAR AHMAD) PSP
DIRECTOR
Forensic Science Laboratory
KP, Peshawar



Forensic Science Laboratory
29, Sector B-1 Phase-V Hayatabad
Khyber Pakhtunkhwa Peshawar
Tel. 091-9217394 / Fax. 091-9217251
No 758 /FSL Dated 21/06/2023

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CHARGE SHEET

I, Waqar Ahmad Director FSL, Khyber Pakhtunkhwa, Peshawar as competent authority, hereby charge you Computer Operator Ms. Shahnaz of FSL, Peshawar as follows:

1. That you have no interest in your official duty.
2. That you are a habitual absentee and late comer.
3. That you had willfully absented yourself from lawful duty for the following period without any prior permission or approval from the competent authority.

Date	Absence (Days)	Late arrivals
31.05.2023	01	
01.06.2023	01	
02.06.2023	--	2 hours, 8 minutes
05.06.2023	01	
06.06.2023	--	2 hours, 30 minutes
07.06.2023	--	1 hour, 25 minutes
12.06.2023	--	3 hours
13.06.2023	01	
14.06.2023	--	2 hours, 5 minutes
16.06.2023	01	
19.06.2023	01	
20.06.2023	--	2 hours, 45 minutes
Total	06 (days)	13 hours & 53 minutes

In the light of the above allegations you appear to be guilty of misconduct and required to explain as to why disciplinary action should not be taken against you under Khyber Pakhtunkhwa Efficiency and Discipline Rules 2011, section 5 (b).

Your written reply should reach to the enquiry committee within 07 seven days positively after receipt of this charge sheet. In case of failure it shall be presumed that you have no defense to offer and an ex-parte action will be taken against you.

Also intimate whether you desire to be heard in person or otherwise.

A statement of allegations is enclosed.

(WAQAR AHMAD) PSP
Director

Forensic Science Laboratory,
Khyber Pakhtunkhwa, Peshawar.



Forensic Science Laboratory

29, Sector B-1 Phase-V Hayatabad

Khyber Pakhtunkhwa Peshawar

Tel. 091-9217394 / Fax. 091-9217251

No 759-62/FSL Dated 21/06/2023

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DISCIPLINARY ACTION

I Waqar Ahmad Director FSL, Khyber Pakhtunkhwa Peshawar being competent authority am of the opinion that you Computer Operator Ms. Shahnaz of FSL Peshawar have rendered yourself liable to be proceeded against departmentally, as you have committed the following acts of omissions/commissions:

STATEMENT OF ALLEGATIONS

1. That you have no interest in your official duty.
2. That you are a habitual absentee and late comer.
3. That you had willfully absented yourself from lawful duty for the following period without any prior permission or approval from the competent authority.

Date	Absence (Days)	Late arrivals
31.05.2023	01	
01.06.2023	01	
02.06.2023	--	2 hours, 8 minutes
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12.06.2023	-	3 hours
13.06.2023	01	--
14.06.2023	-	2 hours, 5 minutes
16.06.2023	01	--
19.06.2023	01	--
20.06.2023	--	2 hours, 45 minutes
Total	06 (days)	13 hours & 53 minutes

For the purpose of scrutinizing the facts with reference to your previous long absence, an Enquiry Committee comprising of Mr. Muhammad Bilal Gov. Analyst for Narcotics, Mr. Zahoor Islam Inspector/Incharge Chemical Section and Mr. Safdar Ali Shah Inspector/Incharge FPB has already been constituted vide this office No.695-98/FSL, dated 07.06.2023. The same committee to enquire into the above allegations.

(WAQAR AHMAD) PSP
Director

Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

Copy of above is sent to the:-

1. Addl: Inspector General of Police, Investigation, Khyber Pakhtunkhwa Peshawar for kind information, please.
2. Mr. Muhammad Bilal, Govt. Analyst for Narcotics, FSL Peshawar.
3. Mr. Zahoor Islam Inspector/Incharge Chemical Section FSL, Peshawar.
4. Mr. Safdar Ali Shah Inspector/Incharge FPB, FSL, Peshawar.

Sir,

In response to the attached Final Show Cause Notice, it is submitted that I did not go absent intentionally rather I was ill and suffering from female related gynae issues, regarding which I have already submitted my reply earlier alongwith medical documents. For the last few weeks I am facing great hardships in the instant enquiry proceedings, which have been initiated against me on the allegations of absence from duty, which are totally baseless. Now I have been transferred to CCP Peshawar where I have assumed my duties.

It is requested that the instant enquiry may please be filed and my pay may be released as under the rules, salary of a government employee cannot be stopped even if the employee is under suspension. I am facing great difficulties due to the stoppage of my salary.

Yours Obediently,

Date: 14-7-23

(SHEHNAZ)
COMPUTER OPERATOR



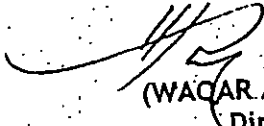
DISCIPLINARY ACTION

I Waqar Ahmad Director FSL, Khyber Pakhtunkhwa Peshawar being competent authority am of the opinion that you Computer Operator Ms. Shahnaz of FSL Peshawar have rendered yourself liable to be proceeded against departmentally, as you have committed the following acts of omissions/Commissions:

STATEMENT OF ALLEGATIONS

1. That you Computer Operator Ms. Shahnaz were posted to FSL Peshawar on 24.10.2023 but you had not submitted your arrival report at FSL Peshawar.
2. That you had not submitted your arrival report at FSL Peshawar and submitted an application for cancellation of the above posting order on 11.11.2022. Subsequently, a note in this regard was forwarded by the undersigned to the quarter concerned for your repatriation back to CPO.
3. That the competent authority regretted your repatriation request on 15.11.2022. Consequently, you were required to submit arrival report at the FSL Peshawar immediately after your repatriation was regretted.
5. You had willfully absented yourself from lawful duty for a long time (w.e.f. 01.11.2022 to 15.05.2023) without any prior permission or approval from the competent authority or submission of any plausible reason for your absence.

For the purpose of scrutinizing the facts with reference to above allegations an Enquiry Committee comprising of Mr. Muhammad Bilal Gov. Analyst for Narcotics, Mr. Zahoor Islam Inspector/Incharge Chemical Section and Mr. Safdar Ali Shah Inspector/Incharge FPB is hereby constituted.


(WAQAR AHMAD) PSP
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

Copy of above is forwarded to the:-

1. Addl: Inspector General of Police, Investigation, Khyber Pakhtunkhwa Peshawar for kind information, please.
2. Mr. Muhammad Bilal, Govt. Analyst for Narcotics, FSL Peshawar.
3. Mr. Zahoor Islam Inspector/Incharge Chemical Section FSL, Peshawar.
4. Mr. Safdar Ali Shah Inspector/Incharge FPB, FSL, Peshawar.



ORDER

This order will dispose off the Departmental Enquiry against Computer Operator Shahnaz of FSL Peshawar regarding the following charges:

1. That Computer Operator Shahnaz was posted to FSL Peshawar vide order No.11486-89/EC/Inv, dated 24.10.2022.
2. That she had not submitted her arrival report at FSL Peshawar and submitted an application for cancellation of the above posting order on 11.11.2022. Subsequently, a note in this regard was forwarded by the undersigned to the quarter concerned for her repatriation back to CPO.
3. That the competent authority regretted her repatriation request on 15.11.2022. Consequently, she was required to submit arrival report at the FSL Peshawar immediately after her repatriation was regretted.
4. She had willfully absented herself from lawful duty for a long time (w.e.f 01.11.2022 to 15.05.2023) without any prior permission or approval from the competent authority or submission of any plausible reason for her absence.

Computer Operator Shahnaz was issued charge sheet and summary of allegations while a Departmental Enquiry Committee comprising Govt. Analyst for Narcotics Mr. Muhammad Bilal Khan, Inspector/Incharge Chemical Section Zahoor Islam and Inspector/Incharge FPB Safdar Ali Shah was constituted to conduct the Departmental Enquiry against the above named official.

During the course of Departmental Enquiry, the committee summoned the defaulter Computer Operator Ms. Shahnaz, Mr. Muhammad Ayaz the then Incharge HR FSL, Mr. Rahat Ullah HR Section and HC Sana Ullah Line Officer FSL. Statements of these officials were recorded in the presence of the delinquent official. During the enquiry proceedings, the committee gave full opportunity of defence and cross examination to the accused official Ms. Shahnaz. Consequently, findings of the enquiry committee were submitted before the undersigned wherein Computer Operator Shahnaz was found guilty and recommended for suitable punishment under E&D Rules 2011.

Final Show Cause Notice was issued to the defaulter official and reply of the same was received. Also she was heard in person and was given ample opportunity to present any plausible justification regarding allegations leveled against her.



21
27

Forensic Science Laboratory
29, Sector B-1, Phase-V, Hayatabad,
Khyber Pakhtunkhwa, Peshawar.
Tel. 091-9217394 / Fax. 091-9217251

After hearing the delinquent official and going through the available material placed on file I have found Computer Operator Shahnaz guilty of high indiscipline and misconduct being a government functionary.

Unfortunately her personal demeanor has also remained questionable. Her husband namely Asad Ullah called from cell number 03352446000 on 06.06.2023 and threatened that if the demands of his wife are not acceded to, he will resort to filing a civil suit against FSL. This shows the disrespectful attitude of the computer operator Shahnaz and those who were approaching a govt. office at the behest of the aforementioned official to blackmail a govt. office and interfere in the official matters of FSL Peshawar. This incident was duly recorded in the Daily Diary of FSL Peshawar vide D.D.No.08, dated 06.06.2023 at 16:10 hrs.


Furthermore, after the Departmental proceedings were initiated against the delinquent official, she again resorted to absenting herself from the lawful duty and indulging in misconduct by arriving late at numerous occasions to attend her duties. A separate departmental enquiry has been initiated in this respect.

She is a habitual absentee, malingerer and prone to waste official time. She is unlikely to become a good office hand as she has proved herself in her initial five years service.

Keeping in view the above facts I, the undersigned being competent authority, hereby award her the major punishment of "Removal from Service" under the Efficiency and Discipline Rules 2011 with immediate effect.

The period of absence i.e. 01.11.2022 to 15.05.2023 to be treated as leave without pay while remuneration for this period to be recovered from the delinquent official accordingly.

Order announced.


(WAQAR AHMAD) PSP
Director
Forensic Science Laboratory,
Khyber Pakhtunkhwa, Peshawar.

No. 882-889 /FSL,

Dated Peshawar, the 18 /07 /2023

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

1. Addl. Inspector General of Police, Investigation Khyber Pakhtunkhwa, Peshawar for kind information, please.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Office Supdt: E-V, CPO, Office Supdt: Inv, Accountant Inv, CPO Peshawar.
4. Head Clerk and SRC, FSL Peshawar.
5. Official Concerned.

To :

Inspector General of Police Khyber Pakhtunkhwa / Additional,
Inspector General of Police Investigation, Khyber Pakhtunkhwa.

Subject :

DEPARTMENT APPEAL/ REPRESENTATION AGAINST THE
ORDER DATED 18.07.2023 WHEREBY THE APPELLANT WAS
REMOVED FROM SERVICE BY AWARDED MAJOR PENALTY.

Respected Sir,

- 1 That the appellant was appointed as computer operator in worthy Department on the recommendation of the public Service Commission of Khyber Pakhtunkhwa in year 04.07.2017.
- 2 That the appellant as such performing her duties with dedication, honesty, due diligence to the entire satisfaction of her immediate seniors without any complaint with full zeal since her induction.
- 3 That a show cause notice was issued to the appellant and an inquiry was conducted without fulfilling mandatory procedure with the respondent Department /competent authority.
- 4 That after complication of inquiry the appellant was awarded the major Penalty vide order dated 18.07.2023 and received by the appellant on 27.07.2023 and was removed from service.
- 5 That order of removal of service by the competent authority, is illegal and against the law on subject.
- 6 That no procedure whatsoever on the subject inquiry which is mandatory in regard to facts, inquiry and associated the relevant record and person.
- 7 That the inquiry so initiated the competent authority under the law and having no authority to conduct the same during the subject impugned inquiry the appellant got transferred vide letter No.1831.36 E-V to CCPO office, Peshawar on 21.06.2023, wherein she submitted her arrival report on 23.06.2023(copy attached).
- 8 That order so issued by competent authority/ department is not according to law, policy and rules.
- 9 That the order of respondent department is based on malafide. Personal grudges and biased and is not sustainable in the eyes of law.
- 10 That the grounds and reasons so mentioned in the removal order are baseless and no committee was constituted where the appellant could have defend herself, the findings so based on the statement of witnesses have nullity in the eyes of law as the same have no base and essence.

It is , therefore humbly requested that the impugned removal order dated 18.07.2023, is illegal, unlawful , and may kindly be withdraw with all back/ consequential benefits.

Yours sincerely

Mst.Shehnaz

Computer operator (BPS -16)
CCP office, Peshawar
CCP Office, Peshawar
Cell: 0335.2446000.

Dated: 03.08.2023

فارم (1)-2-25-PR

حکمانہ زیر دفعہ 160/175 ض ف

بنام

مسماة شہناز دختر شریف گل زوجہ اسد خان سابقہ کمپیوٹر اپریٹر سکنہ محلہ قدرت آباد ماجو کے ضلع چارسدہ پڑانگ حال سعید آباد
نمبر 2 نزد الصفا بیکری دلہ زاک روڈ ایشاور کو بذریعہ نوٹس ہذا مطلع کیا جاتا ہے کہ آپ نے ماہانہ تنخواہ مبلغ -/4,52,298
روپے دوران عرصہ غیر حاضری مورخہ 01.11.2022 تا 15.05.2023 وصول کر کے جبکہ آپ کو بذریعہ آرڈر نمبر
882-889/FSL مورخہ 18.07.2023 ڈائریکٹر FSL نے نوکری سے درخواست کر کے عرصہ غیر حاضری کو بلا
تنخواہ کیا ہے اور واپس جمع کرنے کے احکامات جاری کیے ہیں۔

لہذا آپ کو ہدایت کی جاتی ہے کہ مذکورہ بالا رقم 07 دن کے اندر ہیڈ نمبر 002640 میں جمع کر کے رسید وصولی

حاصل کر کے حوالہ کریں۔



راغب خان انسپکٹر انوشی گیشن یونٹ سی پی او پشاور

7 - 8 - 2023

نوٹس ثانی

فارم (1)-2-25-PR

حکمنامہ زیر دفعہ 160/175 ض ف

بنام

مسماة شہناز دختر شریف گل زوجہ اسد خان سابقہ کمپیوٹر ایڈیٹر سکنہ محلہ قدرت آباد ناجو کے ضلع چارسدہ پڑانگ حال سعید آباد
نمبر 2 نزد الصفا بیکری دلہ زاک روڈ پشاور کو بذریعہ نوٹس مورخہ 07.08.2023 کو مطلع کیا گیا تھا کہ آپ نے ماہانہ تنخواہ
مبلغ -/4,52,298 روپے دوران عرصہ غیر حاضری مورخہ 01.11.2022 تا 15.05.2023 وصول کر کے جبکہ
آپ کو بذریعہ آرڈر نمبر 882-889/FSL مورخہ 18.07.2023 ڈائیکٹر FSL نے نوکری سے برخاست کر کے
عرصہ غیر حاضری کو بلا تنخواہ کیا ہے اور واپس جمع کرنے کے احکامات جاری کیے ہیں۔

مذکورہ بالا رقم 07 دن کے اندر ہیڈ نمبر 002640 میں جمع کر کے رسید وصولی حاصل کر کے حوالہ کرنے کی ہدایت

کی گئی تھی۔

اب بذریعہ نوٹس ثانی مطلع کیا جاتا ہے کہ مذکورہ بالا رقم جمع کر کے رسید وصولی حاصل کر کے حوالہ کریں۔

راغب خان انسپکٹر انوسٹی گیشن یونٹ سی پی او پشاور

16.08.2023



FORENSIC SCIENCE LABORATORY
29, Sector B-1, Phase 5, Hayatabad,
Khyber Pakhtunkhwa, Peshawar.
Tel. 091-9217394/ Fax. 091-9217251
No. 693 /FSL, Dated 7/06/2023

25

To: The Addl. Inspector General of Police,
Investigation, Khyber Pakhtunkhwa,
Peshawar.

Subject: Surrender of Computer Operator Ms. Shahnaz back to CPO.

Memo:


It is submitted that a Show Cause Notice was issued to Computer Operator Ms. Shahnaz on 16.05.2023 for her previous long absence from duty (w.e.f 01.11.2022 to 15.05.2023). In this regard she submitted her reply on 02.06.2023 which is late by 09 days and pleaded the reason for her medical treatment and rest. This reply should have been made earlier to avail any medical leave in this regard (F/A). In this regard a departmental enquiry has been initiated (F/B).

Furthermore, on 31.05.2023 she absented herself for two days (w.e.f 31.05.2023 to 01.06.2023) without any prior permission or approval (F/C). She is also a habitual late comer and has arrived late on 05 times since her arrival report on 16.05.2023. Her repeated absence from duty and late arrivals is also spoiling this office environment.

She also brings a young child with her to the office due to which the staff of FSL is disturbed and this is having a bad effect on the official environment. The presence of child is putting the child in danger as the corridors are frequently used for moving heavy items in trolleys and some substances have chemicals in them which is injurious to health.

On 06.06.2023 at about 15:50 hrs, her husband namely Asad Ullah called from Cell: number 0335-2446000 and said that if the demands of her wife are not acceded to, he will resort to filing civil suit against FSL. According to her husband's message on phone call she is pregnant again. The environment of FSL cannot afford to have a reportedly pregnant female due to its inherent hazards as mentioned before. (F/D).

Therefore, it is requested that Computer Operator Ms. Shahnaz may kindly be surrendered back to CPO due to her ill discipline.


DIRECTOR
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar.

REPLY TO THE CHARGE SHEET NO. 694/FSL DATED 07-06-2023

Respected Sir,

That your honor has issued the above noted charge sheet to the undersigned stating the allegation therein, which is replied as para wise.

1. Needs no reply
2. That the undersigned was transferred from CPO investigation unit to FSL Peshawar Government of Khyber Pakhtunkhwa vide order no. 11486-89/EC/Inv dated 24-10-2022, however, the undersigned was on maternity leave and the undersigned reported after 14 days of her transfer. It is worthy to mentioned that on maternity leave the undersigned cannot be transfer because it has certain implication of relinquishing of the charge and of the arrival report, however, the same implication and effect were not considered by the department, which was legal right of the undersigned. Moreover, the same was not taken into consideration. Furthermore, the undersigned submitted an application on 11-11-2022 for cancellation of the transfer order and the same was regrated on 15-11-2022, which was communicated later on to the undersigned. Meanwhile, noted occurrence took place undersigned was on bed rest which was advised by the competent quarter/Doctor as undersigned was suffering from illness and other gynae complication which was reported to the department dully with the application of the undersigned. (Documents attached)
3. Para No. 3 of the charge sheet as replied above, however, the undersigned apprised the department/office as above.
4. Para No. 4 of the charge sheet is incorrect, the undersigned has already submitted and forwarded her stance by submitting her application, hence, the instant para is not

~~26~~ 27

sustainable, and no willful absence has been committed by the undersigned cannot be term as willful absentia and misconduct. It is, further prayed that the department vide letter No. 693/FSL dated 07-06-2023 recommended the reparation of the undesigned to the CPO.

It is, therefore, requested/prayed that due to the abovementioned reasons the reply of the undersigned be accepted and charges level against the undersigned be withdrawn by consigning the inquiry in hand.


SHEHNAZ

Computer Operator
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

NOTE:

1. Copy of Reply to the show cause notice No. 576/FSL dated 16-05-2023 is enclosed
2. Copy of the Medical Certificates are enclosed.

**OFFICE OF THE ADDL: INSPECTOR GENERAL OF POLICE,
INVESTIGATION BRANCH CPO
KHYBER PAKHTUNKHWA PESHAWAR**



ORDER

Computer Operator Shahnaz of Investigation Unit CPO is hereby transferred and posted to FSL, KP, Peshawar with immediate effect. She will continue to draw pay from the Investigation Unit CPO, Peshawar.

(DR. ISHTIAQ AHMED MARWAT)
PSP/PBM

o/c Addl: Inspector General of Police
Investigation KP Peshawar

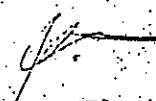
No. 11486-59/EC/Inv: dated Peshawar, the 24 /10/2022.

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


1. DIG/Inv Admn CPO, Peshawar.
2. Director FSL Peshawar.
3. Accountant Inv
4. RK Inv:

DEPARTURE REPORT

In compliance with the Order No. 11486-89/EC/Inv, dated 24.10.2022, issued by the worthy Addl:IGP/Investigation KP, Peshawar, Shahnaz Computer Operator, hereby submit my departure report from Investigation Unit CPO, Peshawar today on 31.10.2022 Afternoon.


(SHAHNAZ)
COMPUTER OPERATOR

Ec


31/10/22
Addl: Inspector General of Police
Investigation
City: Peshawar, Peshawar

CHARGE ASSUMPTION REPORT

30


In compliance with the CPO's Order No. 3003-09/É-V, dated 12.07.2019 I, Shehnaz, Computer Operator (BS-16) hereby assumed my duties in the Investigation Branch CPO today on 23.07.2019 (Forenoon).


(SHEHNAZ)
COMPUTER OPERATOR

No. 8298-8310 /EC/Inv/ dated Peshawar, the 23 /07/2019.

Copies are forwarded for information and necessary action to the:-

1. Inspector General of Police Khyber Pakhtunkhwa.
2. Addl:IGP Headquarters KP Peshawar.
3. Accountant General Khyber Pakhtunkhwa Peshawar
4. DIG/Police Headquarter CPO KP Peshawar.
5. DIG Investigation Admn CPO Khyber Pakhtunkhwa Peshawar.
6. DIG Traffic KP Peshawar.
7. AIG Establishment KP CPO Peshawar.
8. Chief Traffic Officer, Peshawar.
9. SSP/Investigation CPO Peshawar.
10. Registrar CPO, Peshawar.
11. PSO/PA to the Inspector General of Police KP Peshawar.
12. PA to Addl:IGP/Investigation KP Peshawar.
13. Supdt: Secret Branch CPO
14. Accountant Investigation.


(DR. ISHTIAQ AHMAD) PSP/PPM
Addl: Inspector General of Police,
Investigation Khyber Pakhtunkhwa
Peshawar



SERVICES HOSPITAL PESHAWAR GOVERNMENT OF KPK OPD REGISTRATION

Name: SITENAZ Age: 28 Sex: FEMALE

Department: GENERAL OPD Address: PESHAWAR

Hospital Ventry No: 84001-23 Dated: 23.05.2023

History: SIENAZ RIGHT

~~Clinical Examination~~
Present
Abnormal
2/2-2-2
Abnormal

~~Provisional Diagnosis~~
2/2-2-2
Abnormal
2/2-2-2
Abnormal

~~Investigations~~
Abnormal
2/2-2-2
Abnormal

DR. ASIF IZHAR
Physician Medical Specialist
Police & Services Hospital

Doctor's Signature: [Signature]



SERVICES HOSPITAL PESHAWAR
GOVERNMENT OF KPK
OPD REGISTRATION

RS-10

Name: SIENAZ Age: 28 SEX: FEMALE

Department: GENERAL OPD City: PESHAWAR

Hospital Yearly No: 00460-23 Date: 01-06-2023

History

R/-

6th month of pregnancy

Request
Clinical Examination
Recent
abdominal

of Cesarean
to
of Abcord

used
Provisional Diagnosis
Cesarean

of Ultrasound
G-2-2

Abcord
Investigations
Last pregnancy

Referred to S.M.B
for further proceedings
through proper channel

DR. ASIF IZHAR
Physician (Medical Specialist)
Police & Security Hospital
Peshawar

Doctor on Duty

Doctor's Signature

Print Report

GOVERNMENT HOSPITAL PESHAWAR
GOVERNMENT OF KPK
OPD REGISTRATION

NAME: SHENAZ Age: Sex: FEMALE

OPD: GENERAL OPD Address: PESHAWAR

Phone: 84091-23 Date: 23-05-2023

History

Smritis post

Handwritten notes on the left side of the form, including 'Dyspareunia', 'Abnormal', 'Dyspareunia', 'Painful', 'WTS', and 'C/O'.

Handwritten notes in the center: '2 Cladare', '2/2-2-2', and '2/2-2-2'.

Handwritten instructions: 'Avoid Spicy and hot food and pungent herbs'.

DR. ASIF IZHAR
Registrar Medical Services
Police & Services Hospital
Peshawar
Doctor's Signature

Date of Issue



SERVICES HOSPITAL PESHAWAR
GOVERNMENT OF KPK
OPD REGISTRATION

105-101

Name SHAGNAZ Age 27 Sex FEMALE
 Department OPD Address PESHAWAR
 Hospital Yearly No. 11405-22 Dated 17-05-2022

History
 M.P. Lyr
 G.P.
 NO alive
 Issue
 Clinical Examination
 B.P. = $\frac{110}{70}$

Ri-
 Refer to
 Counsel
 Bado.
 Fab fibromia
 no @ - sig (1)

Provisional Diagnosis
 Investigations
 - Obs U/L
 - FBC

- Tab Cal-1000
 no (1) - sig (1)
 C. Culture
 Deferral

Doctor on Duty Bed Rest for 03 days
 Doctor's Signature [Signature]

Dr. A. S. ...
 Peshawar Medical Specialist
 Services Hospital

Lady Dr.

Zubaida Akhtar

M.B.B.S.M.C.P.S

Gynaecologist & Ultrasound Specialist



لیڈی ڈاکٹر زبیدہ اختر

ایم بی بی ایس، ایم سی پی ایس (گائنی)

گائنا کالوجسٹ اینڈ اولٹراساؤنڈ سپیشلسٹ

Pt's Name Munira Age 27 Sex F Date 20/3/2022

To know if my cancer

Three 4 w after had m's

Abnormal bleed was seen

after 1st 2 w as well 3 weeks

me about e episodic pain

in bleed to abnormal bleed

in week as advised to take

sample had use for 3 weeks

rest of my bleed

Dr. Zubaida Akhtar
MBBS, MCPS
Gynaecologist & Sonologist
Room No: 320, Pak Medical Center
40th Street, Rawalpindi

ایڈریس: پشاور، کلینک نمبر 320، پاک میڈیکل سنٹر، خیبر بازار پشاور۔
اوقات کار: روزانہ 10:00 تا 2:00 بجے دوپہر (پیر سے جمعہ)

0315-9245406 رابطہ نمبر
0312-5098679

ایڈریس: الحرم گرین نزد بھگت شاپ مین جی ٹی روڈ
اوقات کار: 4:00 تا 8:00 بجے شام (پیر سے جمعہ)

لیڈی ڈاکٹر **زبیدہ اختر**

ایم بی بی ایس، ایم سی پی ایس (گائنی)

گائنا کالوجسٹ اینڈ ٹراساؤنڈ سپیشلسٹ



Zubaida Akhtar

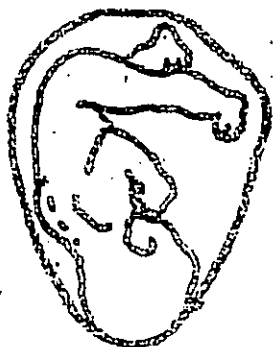
M.B.B.S, M.C.P.S

Gynaecologist &
Ultrasound Specialist

Pt's Name Muneer Age 24 Sex F Date 20/9/2020

ULTRASOUND REPORT

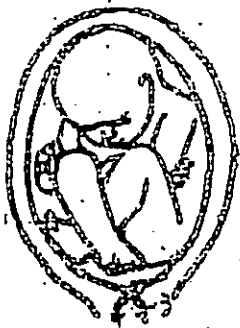
ULTRASOUND FINDINGS



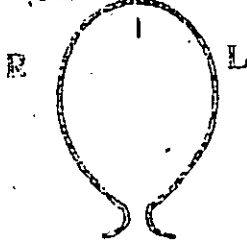
Transverse



Breech (Head Up)



(PLACENTA)



Ant



No of Foetuses

Lie

Presentation Foetal

Movements:

Size Of gestational Sac

Crown Ramp Length

Biparietal Diameter

Femur Length

Abdominal Circumference/Diameter

Gestational age on measurement

Amount of liquor

Comments

Fw:

Placental Localisation Mainly

FUNDAL ANTERIOR/POSTERIOR

RIGHT/LEFT/LAT. UTERINE WALL

UPPER SEGMENT/LOWER SEGMENT

PLACENTAL LOWER SEGMENT

.....COVERING INT.OS/

NOT COVERING INT.OS.

One/TWO/Three
Longitudinal/transverse/Oblique

Cephalic / Breech

Present / Absent

.....Cm

.....Cm

.....Cm

.....Cm

.....Cm

.....Cm

adequate/scanly/excess

Style: *Style: knee*

Dr. Zubaida Akhtar
MBBS, M.C.P.S
Gynaecologist & Sonologist
Room No: 320, Pak Medical Center
Khyber Bazar Peshawar.

0307-5364660 راپہ نمبر:
0311-9475068

ایڈریس: صوابی جلسی گاؤں، تحصیل چھوٹا لاہور، ڈسٹرکٹ صوابی۔
اوقات کار: 7:00 تا 9:30 بجے شام (صرف بروز اتوار)

0315-9245406 راپہ نمبر:
0312-5098679
091-2213546

ایڈریس: پشاور، کلیک نمبر 320، قمر ڈاکو، پاک میڈیکل سنٹر، خیبر بازار پشاور۔
اوقات کار: روزانہ 10:00 تا 2:00 بجے دوپہر (پیر سے ہفتہ)

لیڈی ڈاکٹر زبیدہ اختر

ایم بی بی ایس، ایم سی بی ایس (گائی)

گائنا کالوجسٹ اینڈ انڈا لٹراساؤنڈ سپیشلسٹ



Lady Dr.

Zubaida Akhtar
M.B.B.S, M.C.P.S

Gynaecologist &
Ultrasound Specialist

Pt's Name Queen Age 28y Sex F Date 19/1/2023

To whom it may concern

I am writing to you regarding the case of Mrs. Queen.

The patient is a 28-year-old female who has been experiencing irregular menstrual cycles for the past few months. She has also reported some abdominal pain and weight gain.

On physical examination, she appears healthy and well. Her blood pressure is 110/70 mmHg, heart rate is 70 bpm, and respiratory system is clear.

For the purpose of this letter, I am advised to follow up with the patient and provide necessary treatment.

Best regards,
I am,

as per a case of *Tubercle of the ovary*

Dr. Zubaida Akhtar
MBBS, MCPS
Gynaecologist & Sonologist
Room No: 328, Pak Medical Center
Baiter Peshawar.

ایڈریس: پشاور، کلیک نمبر 320، پاک میڈیکل سنٹر، خیبر بازار پشاور۔
اوقات کار: روزانہ 10:00 تا 2:00 بجے دوپہر (بیر سے جمعہ)
ایڈریس: الحرم گزین نزد چھٹا اسٹاپ مین جی ٹی روڈ
اوقات کار: 4:00 تا 8:00 بجے شام (بیر سے جمعہ)

0315-9245406 راولپنڈی
0312-5098679

Lady Dr.

Zubaida Akhtar

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

Gynaecologist & Ultrasound Specialist



لیڈی ڈاکٹر زبیدہ اختر

ایم بی بی ایس، ایم سی پی ایس (گائنی)

گائنا کالوجسٹ اینڈ اولٹراساؤنڈ سپیشلسٹ

Pt's Name: Suleman Age: 27y Sex: F Date: 12/11/2021

To: woman of 27y

Presenting with irregular menses

for the last 2 years

she has been amenorrheic

for the last 3 months

she has no weight gain

and no other symptoms

she is on medical treatment

for the last 2 years

Dr. Zubaida Akhtar
MBBS, MCPS
Gynaecologist & Sonologist
Room 100, Pak Medical Center
Khyber Pakhtunkhwa

ایڈریس: الحرم گرین نزد جگڑا سٹاپ مین جی ٹی روڈ
اوقات کار: روزانہ 10:00 - 2:00 بجے دوپہر (پیر سے جمعہ)

0315-9245406
0312-5098679

ایڈریس: الحرم گرین نزد جگڑا سٹاپ مین جی ٹی روڈ
اوقات کار: 4:00 - 8:00 بجے شام (پیر سے جمعہ)



Dr. Aziz Ur Rahman

MBBS, FRCS (IRE), D.U (Univ. College London)
FEBU (Fellow European Board of Urology)
Consultant General & Endo Urologist
Sector A-3, Phase-V, Hayatabad, Peshawar.
U.A.N: (091) 111-583-880, Ph: 091-5838800,
Cell: 0333-9278222, E-mail: arurologist@nwgh.pk

PM&DC Reg. No: 2631-N

Date: 1-17-2022

Patient Name: Shehryar شہریار Age 29 Sex: Female

HTN: Y/N DM: Y/N CAD: Y/N

Hx Chronic pain - 2 weeks

C/O Colic episodic, cont. dull - 1.5 months
suprapubic tenderness
fever: + c.e chills/rigors
vomiting: 4/day

O/E Last episode - 4M Ago
U/S @ Male HDU + Bx
Abx

Ex.G: +
DRE: +
U/A: Numerous pus cells
11-12 Red cells
TLc: 15K

- Adv.
- U.S Renal
 - U.S Abd. + Pelvis
 - KUB
 - CT-KUB
 - U. R/E
 - CBC
 - Urea
 - HBS+HCV
 - RBS / FBS
 - PSA
 - ECG

- Creat
- Cal. +Uric Acid
- HBA1C
- Uroflow
- Echo

CBC
R FT5
U mic
CRP

Follow up Umic/c Report

1/4 Canale
2mg Seobone 2gm 1/4 x BD
ATD

Tea Digestion P

Complete Bed rest for 14 days

Dr. Aziz Ur Rahman
FRCS, D.U (Univ. College London)
FEBU (Fellow European Board of Urology)
Consultant Urologist / Surgeon
Northwest General Hospital Hayatabad

for Dr. Aziz Ur Rahman
Dr. Aziz Ur Rahman
Dr. Aziz Ur Rahman

پیشہ / ماہر معائنے کیلئے تشریف لائیں۔



DISCHARGE SUMMARY

Medical Record Number: K020004157881
 Name: Shehnaz Bibi
 Sex: Female
 Age: 31 Year(s)
 Address: House #, Street #, Sector/Area Peshawar Pakistan
 City: Peshawar, Pakistan
 Person Phone:
 Home Phone:

Admission No: K022000080987
 Admission Date: 19-JUL-2022 09:49:31
 Admission Status: Emergency
 Discharge No:
 Discharge Date: 21-JUL-2022 10:25:06
 Discharge Status: Improved
 Primary Consultant: TANVEER SHAFQAT
 Admitting Consultant: NAZIA LIAQAT

Diagnosis During This Admission:

Background Medical Problem(s) (List any chronic medical conditions that the patient may have, such as diabetes mellitus, asthma, hypertension etc.):

Reason for Admission:

INDICATION: g4p1+2 with 37 weeks pog with boh with fetal distress grade 3 msl

Diagnostic & Therapeutic Procedures Performed:

EMG LSCS

INDICATION: g4p1+2 with 37 weeks pog with boh with fetal distress grade 3 msl

ADM#8070, B#,5928 C/S#1186

SURGEON: dr maria

ASSISTANT: dr rabail

FINDINGS: A/H male baby with A/S 8/10,10/10 delivered as cephalic grade 3 msl

fh term lie idng pp cephalic

pv os 3 cm cervix uneffaced membranes absent station -3

PROCEDURE:

PATIENT SHIFTED TO O.T, PUT IN SUPINE POSITION, ANESTHATIZED, CATHETERIZED, CLEAN & DRAPED, P/F INCISION GIVEN, RECTUS CUT, MUSCLES SEPERATED, P/C REACHED, LUS IDENTIFIED, NIC GIVEN, EXTENDED. An alive healthy male baby delivered as cephalic with A/S 8/10,10/10 F/B PLACENTA AND MEMBRANES BY CCT METHOD. UTERUS CLEANED AND STICHED IN DOUBLE LAYER, HEMOSTASIS SECURED, DRAIN KEPT IN. INSTRUMENTS, SHARPS & PACKS COUNT COMPLETED BY ASSISSTANT, ABDOMEN CLOSED IN REVERSED ORDER, ASD DONE, PATIENT VITALLY STABLE. URINE CLEAR, NO ACTIVE BLEEDING AT THE END.

POST OP ORDERS:

NBM TFO

DRAIN TFO

CATHETER 24 HOURS

INJ SULZONE 2GM I/V BD (ATD)

INF FLAGYL 100 ml I/V TDS

INJ. TRAMAL + GRAVINATE I/V STAT THEN SOS

INJ. VOREN I/M TDS

Condition at Discharge:

stable

Followup Instructions:

HOME TREATMENT:

INJ Q BACT 2GM IV BD IV BD ATD FOR 2 DAYS

INJ heparin 7500 IU S/C OD for 2 days then

TAB FLAGYL 400MG 1 TDS FOR 5 DAYS

TAB REMETHAN 50MG 1 TDS 5 DAYS

TAB POLYMALT 1 OD AT MORNING 1 MONTH

TAB CALDREE 1 OD AT NIGHT 1 MONTH

PYODINE SOLUTION TDS ON WOUND WITH DAILY DRESSING

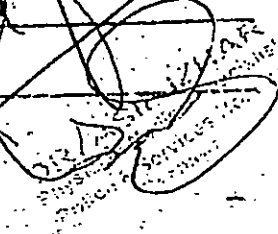
REMOVE STITCHES AFTER 7 DAYS

Instructions:

TREATMENT IN HOME

1. Tab A folic 1x10
2. Tab Koprin 75mg
3. 1x10
4.
5. Tab Duperston
6. 1x10 - 1 month
7.
8. inj clexane 2x1
9. 1x1
10. S/c Daily
11.
12.
13.
14.
15.

Completed bed rest for 2 weeks



SERVICES HOSPITAL PESHAWAR



Govt. of Khyber Pakhtunkhwa

DISCHARGE SLIP

Admission No. 10/115
 Ward Cypres Bed No. (3)
 Name of Patient Shehina
 Father's Name Aliaqul Khan
 Age 28 yrs Sex F
 Address Sultan Colony No. 2 Dalgasai Road P
 Date of Admission 28/12/21
 Time of Admission 10:00 AM
 Date of Discharge 7/2/22
 Diagnosis CYP lower POC with recd. mikiel
 Condition Satisfactory

INVESTIGATIONS

- 1. RBC 102 mfl cell
- 2.
- 3. uric acid 6-8 per cent
- 4.
- 5. Hb 11.4 gm l cell
- 6.
- 7.
- 8.
- 9.
- 10.
- 11.
- 12.
- 13.
- 14.
- 15.

TREATMENT IN HOSPITAL

- 1. Tab. Adfacil 1x0D
- 2. Tab. Dexametson
- 3. 1x BD - 1 month
- 4. Tab. Loflin 75mg
- 5. 1x OD - 1 month
- 6. Inj. clexane 40mg
- 7. S/c daily
- 8.
- 9.
- 10.
- 11.
- 12.
- 13.
- 14.
- 15.

1/2



"Your Health... Our Mission"

Pak Medical Centre & Hospital

Khyber Bazar Peshawar - Pakistan - Ph: 091-2560005-7

CONSENT FOR OPERATION OR SPECIAL PROCEDURE

Name of the Patient: Sheeraz Date: 3/7/2022
 Age / Sex: 26y / F M.R. #: 21-20110 Room/No/Ward/Bed No: 5/
 Date of Admission: 3/7/2022

1. I hereby authorise the doctors of Pak Medical Centre & Hospital to perform the following procedures / operations.
 میں مندرجہ ذیل آپریشن کروانے کے لیے رضامند ہوں۔

The procedures, their nature and consequences, as well as possible risks and complications have been explained to me and I understood them.

I recognise that during the course of the operations/procedure unforeseen conditions may necessitate additional or different procedures. I authorise the doctors to perform these procedures.
 میں آپریشن کی نوعیت اور اس کے خطرات سے آگاہ ہوں۔

I Consent to the administration of anaesthesia. The mode anaesthesia (and the use of anaesthetic) is left to the discretion of the anaesthetist as he deems advisable.
 آپریشن کے دوران ناگزیر حالات میں مندرجہ بالا آپریشن کے علاوہ دوسرے آپریشن کی بھی اجازت ہے۔

I am aware that the practice of medicine and surgery is not an exact science and I acknowledge the no guarantees have been made to me as to the results of the operation or procedure.
 میں ہر قسم کی بے ہوشی کے لیے رضامند ہوں۔

I further authorise Pak Medical Centre & Hospital and the doctors in charge to carry out such diagnostic procedures administer blood transfusion, intravenous medications deemed necessary and to make proper disposition of all tissues or anatomical parts.
 آپریشن کے متعلق کسی قسم کی گارنٹی نہیں دی جاسکتی۔

I agree with the conditions
 میں خون لگوانے، دوائیاں دینے اور ٹیسٹ کرنے کی بھی اجازت دیتا ہوں۔
 مختلف اجزاء کے معائنہ کی اور تلف کرنے کی بھی اجازت دیتا ہوں۔
 میں اوپر دی گئی شرائط پر متفق ہوں۔

Signature of Patient _____ Date _____ Time _____

(In case of a minor, signatures of guardian) (I am the only legal guardian at the moment)

Witness Name _____ Relation _____ Sig. _____

Relation _____ Sig. _____

Medical Centre & Hospital

Khyber Bazaar Peshawar

Phone No: 091-2560005-7

Patient Copy

Receipt

Date / Time: 3-Jul-2021 12:28AM

Medical Record No. 21-20110
 Patient Name W/O Asad
 Patient Guardian C/o Asad
 Address Peshawar
 Cell 0312-9027103
 CNIC _____
 Gender F

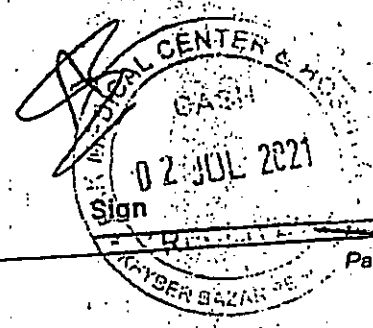
Consultant Dr. Zubaida Akhter

Room No Day Case

Received Amount 20,000.00

Procedure

Issued by Abid Hussain



Printed on 7/3/2021

DEPARTMENT OF MEDICAL IMAGING

Hayatabad Medical Complex, Peshawar.

Phone: 9217140-7 Ext: 231

radhmc9@gmail.com

Dr. Mehreen Samad
F.C.P.S
Associate Professor &
Head of Radiology Department

Dr Ghazala Wahid
F.C.P.S
Assistant Professor

Dr Adnan Ahmed
F.C.P.S
Assistant Professor

Dr Naila Tamkeen
F.C.P.S
Assistant Professor

Dr Mainoona Afsar
F.C.P.S
Specialist Registrar

Dr Mahnoor Rehman
F.C.P.S
Consultant Radiologist

Dr Rabia Shah
F.C.P.S
Specialist Registrar

Name : Shahnaz

Sex : Female

Age : 26 Years

Dated : 14 June 21

ULTRASOUND PELVIS

Uterus

Uterus is normal in size having single gestational sac of 2.3 cm corresponding to gestational age of 6 weeks, 5 days. Yolk sac is seen however fetal pole is not seen yet. Follow up is advised.

Ovaries

No gross adnexal pathology seen.
No free fluid seen in cul de sac.

Urinary bladder

Suboptimally filled

14-6-21

Dr. Pishan
Dr. Ghorbani
Dr. Jinnah
Dr. Jinnah

IMPRESSION

see comments

Dr. tabassum

NB: All doctors are requested to please provide complete history of the patient while you refer him / her for CT / MRI / Ultrasound or x-ray examination and cases without proper history will not be reported.



Northwest General
Hospital & Research Center

Dr. Aziz Ur Rahman

MD, PhD, FRCR, FRCR (Gen Med), FRCR (Path), FRCR (Micro)
FRCR (Gen Med), FRCR (Path), FRCR (Micro)
FRCR (Gen Med), FRCR (Path), FRCR (Micro)
FRCR (Gen Med), FRCR (Path), FRCR (Micro)
FRCR (Gen Med), FRCR (Path), FRCR (Micro)

Medical Reg. No. 10214

Date: 1-11-2020

Age: 29 Sex: Male

Patient Name: Shahbaz

HTN: Y/N DM: Y/N CAD: Y/N

Hx: Chronic pain - 2 weeks

CID: Chronic ep. pain, cont. Dur. - 1.5 months
Idiopathic Tenderness
fever: 1 x 2 chills / Rigors
weight: 4 / day



Ex.G: U. Abd. Numbness plus cell
11-12 last cell

DRE: Normal
Flc - 15%

- Adv.
- U.S Renal
 - U.S Abd. + Pelvis
 - KUB
 - CT-KUB
 - U. R/E
 - CBC
 - Urea
 - HBS+HCY
 - RBS / FBS
 - PSA
 - ECG

- Creat
- Cal +Uric Acid
- HBAIC
- Uroflow
- Echo

Arde
CBC
R FT
Uric
CRP

Follow up Uric / c
Report

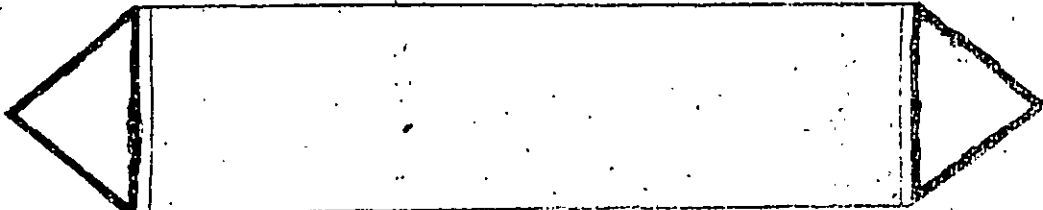
1/2 Canine
2mg Subcut 2x 1/2 x PB
(Test done)

Tc. Digested
1/6
Complete Blood test for

Dr. Aziz Ur Rahman
FRCR (Gen Med), FRCR (Path), FRCR (Micro)
FRCR (Gen Med), FRCR (Path), FRCR (Micro)



باعت خیرا الشہ جناب بی بی بکتو خواہ سرورس ٹریبونل شاہد



2 جناب

بنام

صحة شہاد

موردہ
مقدمہ
دعویٰ
نمبر

I.G.P.

باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے داسٹے پیردی اور جناب رہی وکل کاروائی متعلقہ
 آ ان مقام بیت المقدس کیلئے جاوید علی غنی اللہ وکیٹ سے ایم پورٹ آف
 امرام اللہ خاتون ح ۸۰۸۸
 مقررہ کر کے اتر کر کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دگا۔ نیز
 وکیل صاحب کو راشی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دیئے جناب رہی اور اقبال دعویٰ اور
 صورت ڈگری کرنے اجراء اور وصولی چیک، روپیہ اور عرصی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرا میں پر دستخط کرنے کا اختیار ہوگا۔ نیز صورت عدم پیردی یا ڈگری یا بطرفہ یا اپیل کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل غمرانی و نظر ثانی و پیردی 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 بالا اختیارات حاصل ہوں گے اور اس کا سائن
 پر داخہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جائے التوائے مقدمہ کے سب سے رہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیردی
 مذکور کریں۔ لہذا اذکالت نامہ لکھ دیا کہ سند ہے۔

المزبور 25 ماہ 08 2023

Accepted

نیٹاف

رہنما
Sams