



Forensic Science Laboratory

29, Sector B-1, Phase 5, Hayatabad;

Khyber Pakhtunkhwa, Peshawar.

Tel.091-9217394 / Fax.091-9217251

No. 335 /FSL, Dated 28/02/2024

To:

The Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Subject: SERVICE APPEAL NO.1753/2023 MST: SHEHNAZ EX-COMPUTER OPERATOR (BS-16).

VS

THE ADDL: INSPECTOR GENERAL OF POLICE, HQRS KHYBER PAKHTUNKHWA AND OTHERS.


Memo:

Kindly refer to the subject service appeal No.1753/2023 by the title "Mst: Shehnaz Ex-Computer Operator VS The Addl. IGP Hqrs, Khyber Pakhtunkhwa Peshawar and others".

Reply/comments on the above referred service appeal along with its enclosures are hereby forwarded as desired, please.

Encl. (56)

No. /FSL


DIRECTOR
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar.

Copy of above is forwarded to the Addl. IGP Investigation, Khyber Pakhtunkhwa for kind information, please.


DIRECTOR
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

SERVICE APPEAL NO. 1753/2023

Mst; Shehnaz Ex-Computer Operator (BPS-16) CCPO, Office Peshawar.

(Appellant)

VERSUS

Addl: Inspector General of Police, (HQrs) Khyber Pakhtunkhwa, Peshawar & others

(Respondents)

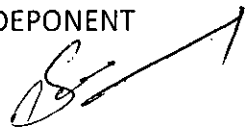
S.No.	Description of documents	Annexure	Page
1.	Reply/Comments		1-4
2.	Order to FSL vide No. 11486-89/EC/Inv dt:24/10/2022		5
3.	Departure 31/10/2022		6
4.	Copy of Show Cause Notice No. 576/FSL dt: 16/05/2023		7
5.	Reply of Show Cause Notice No. 576/FSL dt: 16-05.2023		8
6.	Copy of Show Cause Notice 755/FSL dated 20.06.2023		9
7.	Transfer order to CCPO vide No. 1831-36/EV dt: 21/06/2023		10
8.	Charge Sheet No. 758/FSL dt:21/06/2023		11
9.	Charge Sheet No. 759/FSL dt:21/06/2023		12
10.	Copy of Removal from Service Order No. 882-889/FSL dt: 18.07.2023		13-14
11.	Copy of Charge Sheet No. 694/FSL dt: 07/06/2023		15
12.	Copy of Statement of allegations vide No. 695-98/FSL dt: 07/06/2023		16
13.	Copy of reply of charge sheet No. 694/FSL dt: 07/06/2023		17-18
14.	Surrender of Ex-C.O Shehnaz vide No. 693 dt: 07/06/2023		19
15.	Copy of Final Show Cause Notice vide No. 791/FSL dt: 04/07/2023		20
16.	Reply dt:14/07/2023		21
17.	Copy of Enquiry Report		22-25
18.	Cross questions		26-27
19.	Statement of official concern		28-32
20.	Departmental appeal dt:03/08/2023		33
21.	Notice dt: 07/08/2023		34
22.	Notice dt: 16/08/2023		35
23.	Copy of Rejected Appeal No. 8788-90/EC/Inv dt: 06.09.2023		36
24.	Medical reports		37-53
25.	Affidavit		54
26.	Authority Letter		55

06-03-2024
Peshawar
S.B

ATTESTED
REAN ULLAH
Commissioner
High Court

01-07-24

DEPONENT


MUHAMMAD IRSHAD KHAN
Deputy Superintend of Police
Forensic Science Laboratory
Peshawar

CNIC: 17102-3741872-5

CELL: 0345-9142433

①

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

SERVICE APPEAL NO. 1753/2023

Mst; Shehnaz Ex-Computer Operator (BPS-16) CCPO, Office Peshawar.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 11581

(Appellant)

Dated 04-03-2024

VERSUS

Addl: Inspector General of Police, (HQrs) Khyber Pakhtunkhwa Peshawar & others

(Respondents)

SUBJECT: PARA WISE COMMENTS ON BEHALF OF RESPONDENTS.

Respectfully Sheweth:

Preliminary objections:

- i. That the appellant got no cause of action & locus standi to file the instant appeal
- ii. That the appellant has not come to the Tribunal with clean hands.
- iii. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
- iv. That the appeal is bad in its present form hence not maintainable.
- v. That the appeal is liable to be dismissed in limini.
- vi. That the appeal is badly time barred.

REPLY ON FACTS:

1. Pertains to record, hence no comments,
2. Para is incorrect. Appellant during service proved herself an inefficient, habitual absentee, tardy and wilfully absented herself from duty with effect from 01.11.2022 to 15.05.2023. On account of such misconduct she was served with a Show Cause Notice. In response to which she submitted her reply which was perused by the competent authority however her reply was found unsatisfactory, hence she was issued with charge sheet and proper department enquiry was initiated against appellant. (*Copy of show cause notice, reply, charge sheet/summary of allegation and reply are attached as(Annex A to D.)*)
3. Para is incorrect. On account of absence from duty w.e.f, 01.11.2022 to 15.05.2023, appellant was proceeded against departmentally, however, during enquiry proceedings appellant again absented herself from lawful duty and indulging in misconduct by arriving late/tardy at numerous

occasions to attended her duty. On account of such mis-conduct she was served with another show cause notice. Copy of show cause notes attached as (Annexure E).

4. Incorrect after popper departmental enquiry and upon receipt of recommendations of enquiry panel, she was served with Final Show Cause Notice and after personal hearing awarded major punishment of removal from service through speaking order (Annexure F & G).
5. Correct to the extent of filing departmental appeal however the same was examined by the appellate authority and after giving her proper opportunity of Personnel hearing, but she failed to satisfy the appellate authority in providing any plausible evidence in support of her wilful absence, however medical documents which she produced before the appellate authority were just to cover up her wilful absence period. Appellant's record also shows that she is habitual absentee and proved herself an in efficient official, hence her departmental appeal was rejected on merit vide order dated: 06.09.2023.(copy of order attached as (Anexure - I.))
6. Para No.6 is incorrect and misleading, reply already given in the proceeding paras.
7. That the orders of respondents are quite legal and in accordance with law/ rules. Appellant has got no cause of action to file the extent appeal which is devoid of merit, hence liable to be dismissed.

Grounds:


8. Incorrect. The Order of removal from service by the competent authority is quite legal and accordance with rules.
9. Incorrect. The Order of respondents are based on facts, law hence the same are sustainable in the eyes of law.
10. Incorrect. Reply already given vide para above.
11. Incorrect. The respondents have acted in accordance with law and observed the due process of law in the departmental proceedings. The appellant was served with the Show Cause Notice, Charge Sheet and Statement of allegation, whereas during enquiry she was also associated with the enquiry proceedings and proper opportunity was provided to defend herself. Consequent upon receipt of recommendation from enquiry

panel, wherein she was found guilty, therefore, she was served with Final Show Cause Notice and before passing final order she was heard in person by the competent authority.

12. Incorrect. Misconduct and indiscipline attitude of the appellant can be accessed from the fact that even though she was transferred to FSL but she was reluctant to comply with the legal and valid order and for long time she resisted the said order. Such an attitude of a member of the discipline force is un-becoming of a good officer.
13. Incorrect. Each and every document so produce by the appellant was considered by the respondents but the same were found to be lame excuses just to protect her skin from the clutches of law.
14. Incorrect. Order of removal of the appellant from service is quite within the domain of the competent authority. The competent authority and appellate authority have acted purely in accordance with law and merit of the case. The order of removal from service of the appellant being lawful needs no interference and requires to be upheld in the larger interest of law, justice and fair play.
15. Incorrect. All legal and codal formalities were fulfilled by the respondents during the departmental enquiry.
16. Incorrect. It is well established principle of the service laws that leave is not privilege of an official / officer. It is the discretion of competent authority to sanction or not to sanction leave to his subordinate. In this paragraph the appellant has considered her right to sanction leave by her officer, which is absolutely against the Service laws and rules.
17. Incorrect. As explained in the proceeding para the appellant was associated with the enquiry and was afforded legal opportunities to defend herself during the enquiry proceedings.
18. Incorrect. The order of respondents are quite legal and in accordance with law.
19. Incorrect. The appellate authority properly examined the departmental appeal, and before passing final order she was also heard in person, but the appellate authority after finding no substance in the plea taken by the appellant dismissed her departmental appeal through speaking order. The order of dismissal of appeal is also in accordance with law and rules, which needs to be maintained/upheld in the larger interest of law /rules.


Prayers:

In view of above stated facts it is therefore, prayed that the appellant had badly failed to pin point any legal or factual Lacuna in the orders of respondents, hence appeal filed by the appellant being devoid of merit may please be dismissed with cost.


Director Forensic Science Laboratory,
Khyber Pakhtunkhwa, Peshawar.


Respondent No. 4

(WAQAR AHMAD)PSP
Incumbent


~~Capital City Police Officer~~
Peshawar.


Respondent No. 5

(SYED ASHFAQ ANWAR) PSP
Incumbent


Deputy Inspector General of Police,
Investigation, Khyber Pakhtunkhwa,
Peshawar.

Respondent No. 3

(ZAIB ULLAH KHAN)PSP
Incumbent


Addl: Inspector General of Police,
(HQrs.)Khyber Pakhtunkhwa,
Peshawar.

Respondent No. 1

(AWAL KHAN) PSP
Incumbent


DIG/ LEGAL, CPO

For :Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Respondent No. 2

(DR. MUHAMMAD AKHTAR ABBAS) PSP
Incumbent

**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

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

No. 11486-89/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.

Attested
to be a
true copy

Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

DEPARTURE REPORT

In compliance with the Order No. 11486-89/EC/Inv, date 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
Khyber Pakhtunkhwa, Peshawar

Attested
To be a
True copy

Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar



A

⑦ 26

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.

Attested
to be a
true copy


Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar.


Director
Forensic Science Laboratory
Khyber Pakhtunkhwa
Peshawar

B

8

27

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).

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.

The reply is there very late and these reasons should have been brought on record earlier in this regard. The reply is found of a unsatisfactory and in want of a departmental enquiry. A charge sheet to be issued to the officer mentioned on the ground mentioned in SCN.

*Attested
To be a
True copy*

*Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar*

H.R.

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

2/6
2/06



13

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.

*Accepted
To be a
true copy*

Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

[Signature]
DIRECTOR
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar



OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
CENTRAL POLICE OFFICE,
KHYBER PAKHTUNKHWA PESHAWAR

No. 1831-36

/E-V,

dated Peshawar the 21/06/2023

ORDER

Lady Computer Operator Shahnaz Investigation Wing CPO is hereby transferred & posted to CCPO Peshawar, with immediate effect.

Sd/-

(RIZWAN MANZOOR)PSP

Deputy Inspector General of Police, HQrs:
Khyber Pakhtunkhwa,
Peshawar

Endst: No. & date even.

Copy forwarded to the: -

- Secretary, Election Commission of Pakistan, Islamabad.
- Additional Inspector General of Police, Investigation, Khyber Pakhtunkhwa, Peshawar.
- Deputy Inspector General of Police, HQrs: Khyber Pakhtunkhwa, Peshawar.
- Capital City Police Officer, Peshawar.
- Accountant General Officer, Khyber Pakhtunkhwa, Peshawar.
- Registrar, CPO, Peshawar.
- Office Superintendent Secret Branch CPO Peshawar.

(DR. LAHID ULLAH)PSP

AIG/Establishment

For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Attested
to be a
true copy

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 758 /FSL Dated 21/06/2023

16

CHARGE SHEET

(M)

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.

Attested

[Signature]
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar.

[Signature]
(WAQAR AHMAD) PSP
Director

Forensic Science Laboratory,
Khyber Pakhtunkhwa, Peshawar.



27

12

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
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

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.

Attested
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

(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.



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

171

13

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.

Attested

Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar



21

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

14

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.

Attested

Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

No. 882-889 /FSL,

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

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.



15

C

~~15~~

Forensic Science Laboratory
29, Sector B-1 Phase-V Hayatabad
Khyber Pakhtunkhwa Peshawar
Tel. 091-9217394 / Fax. 091-9217251
No 694/FSL Dated 07/06/2023

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:

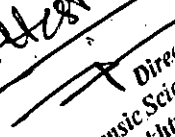
1. That you were posted to FSL Peshawar vide order No.11486-89/EC/Inv, dated 24.10.2022.
2. That you had not submitted your arrival report at FSL Peshawar and submitted an application for cancellation of the above posting order on 11.11.2022. Subsequently, a note in this regard was forwarded by the undersigned 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.


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.

Attested

Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar.


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

Date: 08-06-23



Forensic Science Laboratory
29, Sector B-1 Phase-V Hayatabad
Khyber Pakhtunkhwa Peshawar
Tel. 091-9217394 / Fax. 091-9217251
No. 695-18/FSL Dated 07/06/2023

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 Govt. 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.

Attested
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

Attested

Director
Forensic Science Laboratory
K.P. Pakhtunkhwa, Peshawar

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 undersigned 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.

Attested

[Signature]
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar



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

(19) 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.

Attested


Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar



Forensic Science Laboratory
29, Sector B-1 Phase 5 Hayatabad
Khyber Pakhtunkhwa Peshawar
Tel & Fax. 091-9217394
No. 791 /FSL, Dated 04/07/2023

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.

Attested

Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

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

Date 4-07-23

Sir,

21

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,



(SHEHNAZ)

COMPUTER OPERATOR

Date: 14-7-23

Admitted

Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

22

ENQUIRY REPORT

DEPARTMENTAL ENQUIRY AGAINST MS. SHEHNAZ COMPUTER OPERATOR,

FSL PESHAWAR

A Departmental Enquiry was initiated by the competent authority against Mst. Shehnaz Computer Operator vide No. 695-98/FSL dated 07-06-2023 (F/A) and an Enquiry Committee was constituted as follows:

- i. Mr. Muhammad Bilal In-charge Narcotic Section.
- ii. Mr. Zahoor Islam In-charge Chemical Section.
- iii. Mr. Safdar Ali Shah In-charge Finger Print Bureau.

A proper charge sheet and statement of allegations on the following charges were issued and served upon the official.

CHARGES:

1. That you Computer Operator Mst. Shehnaz were posted to FSL Peshawar on 24-10-2023 but you had not submitted your arrival report at FSL Peshawar (F/B).
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 Director FSL to the quarter concerned for your repatriation back to CPO (F/C).
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 (F/D).
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.

In response of the above allegations Mst. Shehnaz Computer Operator FSL Peshawar submitted her written reply before the Enquiry Committee (F/E). Her reply to the Enquiry Committee is reproduced as under:

Attested

Director
Forensic Science Laboratory
Khyber Pukhtunkhawa, Peshawar

[Handwritten signatures and initials]

23

"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 reported after 14 days of her transfer. It is, worthy to mention that on maternity leave the undersigned cannot be transferred 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 regretted 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 duly with the application of the undersigned. (Documents attached).
3. Para No.3 of the charge sheet as replied above, however, the undersigned appraised 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 sustainable, and no willful absence has been committed by the undersigned cannot be termed as willful absentia and misconduct. It is, further prayed that the department vide letter No.693/FSL dated 07-06-2023 recommended the repatriation of the undersigned to the CPO".

To dig out the real facts the enquiry committee summoned the defaulter official Mst: Shehnaz, Mr. Rahat Ullah In-charge HR Section of FSL Peshawar, ASI Muhammad Ayaz of HR Section FSL and Lines Officer Mr. Sana Ullah FSL Peshawar. During the enquiry proceedings the Enquiry Committee gave full opportunity of defence and cross examined the defaulter official. Proceedings of cross examination are as under:-

Attested
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

CROSS EXAMINATION:

سوال نمبر 1: 31 اکتوبر 2022 آپ نے انوسٹی گیشن بورڈ سی سی پی او میں اپنی ڈیپارچر رپورٹ جمع کی اور آپ ایف ایس ایل میں 2022-11-11 کو آئی آپ دس دن لیٹ کیوں ہوئی؟

جواب: میں نے سرکاری فون نمبر ایف ایس ایل پر کال کی تھی کہ میں بیمار ہوں اور میڈیکل ساتھ لاؤنگی۔

سوال نمبر 2: میڈیکل ساتھ لانے کے لئے کال کی متعینہ وقت اور تاریخ کا کچھ علم ہے یا نہیں اور میڈیکل ساتھ لانے پر کس کے ساتھ جمع کیا تھا۔

جواب: کال کرنے کا وقت/دن معلوم نہیں اور میں نے 2022-11-11 کو درخواست بغرض واپسی سی سی پی او کے ساتھ میں نے ایچ آر سیکشن ایف ایس ایل میں (میڈیکل) جمع کیا تھا۔

سوال نمبر 3: مورخہ 2022-11-11 کو آپ نے بغرض ٹرانسفر کینسلیشن جناب ڈائریکٹر صاحب ایف ایس ایل کو درخواست دی اس کا کیا نتیجہ نکلا؟

جواب: تقریباً 15 دن کے بعد مجھے پتا چلا کہ میرا ٹرانسفر کینسل نہ ہو سکا۔

سوال نمبر 4: اس کا علم ہونے کے بعد آپ نے ایف ایس ایل میں اپنی حاضری کو یقینی کیوں نہیں بنایا؟

جواب: مجھے زبانی طور پر سی سی پی او میں کسی نے بتایا لیکن تحریری طور پر مجھے کوئی اطلاع موصول نہیں ہوئی کہ آپ کا ٹرانسفر کینسل نہیں ہوا ہے اور آپ ایف ایس ایل میں تعینات رہو گی۔

سوال نمبر 5: جب آپ کے علم میں تھا کہ میرا ٹرانسفر کینسل نہیں ہوئی تو آپ نے ایف ایس ایل میں حاضری کیوں نہیں کی؟

جواب: میں اس لئے ایف ایس ایل نہ آسکی کیونکہ میں بیمار تھی اور فون پر لائن آفسر کو اس کے موبائل نمبر پر اطلاع دی تھی۔

سوال نمبر 6: لائن آفسر ایف ایس ایل کے ساتھ رابطہ ہونے پر اس نے کیا کہا؟

جواب: لائن آفسر ایف ایس ایل نے کہا کہ جب بھی آپ ایف ایس ایل آتی ہیں تو ساتھ میڈیکل بھی لائیں۔

Attested
Director
Forensic Science Laboratory
Khyber Pukhtunkhawa, Peshawar.

In-charge HR Section FSL Peshawar Mr. Rahat Ullah summoned by the enquiry committee in connection with the enquiry, he verbally as well as in written submitted his statement before the enquiry committee that he was on ex-Pakistan leave from 25-10-2022 to 16-11-2022 for performing of Umrah and reported back to FSL Peshawar on 17-11-2022 (F/G).

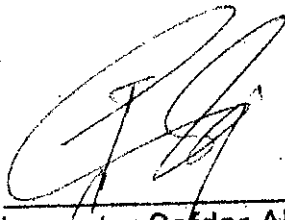
In the light of above question No.2 the Enquiry Committee summoned ASI Muhammad Ayaz the then incharge HR Section FSL Peshawar and asked about the submission of medical documents by the defaulter official who verbally as well as in written denied that the defaulter official did not submitted any medical documents in HR Section (F/H). Whereas, regarding question No.5 & 6 the Enquiry Committee summoned HC/Lines Officer FSL Sanaullah who verbally as well as in written reply denied about the telephonic conversation with Mst. Shehnaz Computer Operator FSL Peshawar (F/I).

CONCLUSION:

During the enquiry proceedings, the Enquiry Committee provided full opportunity of defence and cross examined to the defaulter official.

From the perusal of record and statements recorded during the course of enquiry and as per medical documents submitted by Mst: Shehnaz Computer Operator FSL Peshawar, this is a fact that the defaulter official even if suffering from gynecological complications did not follow the required procedure to avail proper medical leave and remained absented from the lawful duty for a long period i.e. 01.11.2022 to 15.05.2023. During this period she had withdrawn full pays without performing her official duty without authorization.

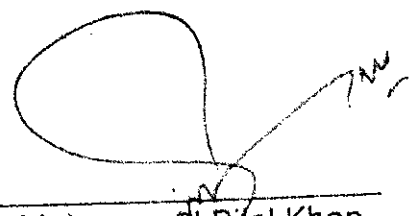
Keeping in view of the above, the enquiry committee concludes that Computer Operator Mst: Shehnaz is found guilty of the charges leveled against her. She may be awarded suitable punishment under E&D Rules 2011.



Inspector Safdar Ali Shah
Incharge Finger Print Bureau
(Member)



Inspector Zahoor Islam
Incharge Chemical Section
(Member)



Muhammad Bilal Khan,
Incharge Narcotic Section
(Member)

Attested
Director
Forensic Science Laboratory
Khuzdar Pukhtunkhawa, Peshawar

سوال جواب (مسئلتان)

سوال 1
31 اکتوبر 2022 آپ نے CPO Invariant میں اپنی departure
رپورٹ جمع کی اور آپ FSL میں 11-11-2022 کو آئے
آپ دس دن لیٹ کیوں آئی 9

Attested
Director
Forensic Science Laboratory
Khyber Paktunkhwa, Peshawar.

آپ نے سرکاری فون پر FSL پر کال کی تھی کہ میں بیمار ہوں اور میری
ماتر لاؤٹنگ ہے

سوال 2
میرے ماتر لاؤٹنگ کے کال کی Exact Time/Date کا پتہ کون سے
اور میرے ماتر لاؤٹنگ کے کال کو جمع کیا تھا

جواب 2
کال دن کا وقت ادن صبح 11:00 اور میں 11/11/22 کو
دروازہ کھول دیا اور وہاں سے HR کے پاس گیا
میں نے جمع کیا تھا

سوال 3
فورم 11/11/22 کو آپ نے Transfer cancellation دیا
FSL کو دروازہ کھول دیا اور فورم کا پتہ لکھا

جواب 3
فورم 15 دن کے بعد جمع ہونے کے بعد فورم
Cancell کر دیا

سوال 4
میں نے فورم کو جمع کیا اور اسے FSL میں اپنی طرف سے
جمع کیا اور اسے FSL میں جمع کیا
میں نے فورم کو جمع کیا اور اسے FSL میں
جمع کیا اور اسے FSL میں جمع کیا

Director
Forensic Science Laboratory
Khyber Paktunkhwa, Peshawar.

بیان اذکار: ہیکل ڈکریٹ فسیل اینٹار

مذکورہ بالا

۱۱۲

میں راحت اللہ فسیل اینٹار میں لکھنے پر ہیکل ڈکریٹ لکھیات ہیں۔
 سارنہ ۱۵/۱۰ کو لکھی گئی آیر لکھنے شہناز کا تبادلہ فسیل اینٹار میں
 ۲۵/۱۰ کو سیریا چھٹی پر آٹھ بجے ادا کیے منظور ہوئی جس
 پر میں مورخہ ۲۵/۱۰ کو عمر کی ادائیگی کیلئے روانہ ہوا اور مورخہ
 ۱۱/۱۰ کو بھرہ کی ادائیگی کے بعد پاکستان آیا اور ایک دن چھٹی کے بعد
 دفتر سامنے آیا۔ دو تری دیکارڈ کے مطابق معلوم ہوا کہ میں شہناز
 نے دفتر فسیل میں تبادلہ کے بعد احمد/حافظی کرنے سے معذرت
 کی اور ایک تحریری درخواست جناب ڈائریکٹر مہم فسیل کو
 ارسال کیا تبادلہ مانس پور کروانا جائے۔ اس کی درخواست پر
 روانگی کرنے کیلئے جناب ڈائریکٹر صاحب نے الفنی کیشن یونٹ کو
 تحریر بھیجا۔ جس پر الفنی کیشن یونٹ سے ہنوری لکھا گیا کی گئی اور
 ایڈیشنل ۱۶/۱۰ سی او کو بھیجا گیا۔ اس کے بعد دفتر فسیل کو کوئی تحریری
 دستاویز موصول نہیں ہوئی اور نہ ہی میں شہناز نے حافظی/آمدگی۔

Attested
 Director
 Forensic Science Laboratory
 Khairpur Pakhtunkhwa, Peshawar

12-06-2023

مذکورہ
 راحت اللہ
 ہیکل ڈکریٹ فسیل اینٹار

مذکورہ Cross میں ہے راحت اللہ ہے

✍

ضامی ۱

من HR/Asi بیٹن میں تعینات تھا اور ص 24¹⁰/₀₂₂ کو

میں شیڈ کا نام CPO الفوسی لیٹا سے FSL پیڈار ہری

فورم 31¹⁰/₀₂₂ کو میں شیڈ الفوسی لیٹا CPO سے روانہ

کی اس 2 بعد میں شیڈ نے FSL پیڈار میں آمد میں

کی الشہ فورم 11¹¹/₀₂₂ کو ایک کمری درخواست دے دی

جس میں اس نے FSL میں حاضر رہنے سے معذرت ظاہر

اسی دن درخواست پر کارروائی کے FSL کی جانب سے نوٹ

نہیں لکھا گیا جس میں میں شیڈ کی آمد سے متعلق

نکھایا گیا کہ FSL میں آمد کرنے سے معذرت ظاہر کرتے

لینا اس کو CPO الفوسی لیٹا والی سہیل سے جان

میں شیڈ نے کئی درخواست برائے بیماری یا کسی سہیل

دوسرے دفتر HR/FSL میں نہیں دی

فورم 20/06/22

محمد آواز Asi الفاضل اہل سہیل

[Signature]

[Signature]

[Signature]

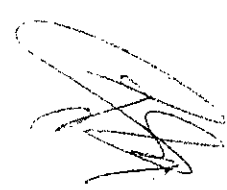
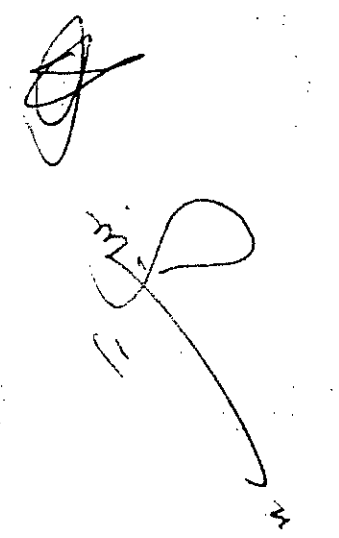
Attested
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

بہت سے چیزیں دیکھی ہیں جن سے یہ ظاہر ہوتا ہے کہ اس شخص کو جانتا ہوں اور اس سے پہلے اس کا نام نہیں لیا تھا۔
میں نے اس سے بات کی اور اس سے یہ ظاہر ہوا کہ وہ اس شخص کو جانتا ہے اور اس سے پہلے اس کا نام نہیں لیا تھا۔
اس شخص کا نام جو اس شخص سے پہلے اس کا نام نہیں لیا تھا۔

جواب۔ قسم کا کوئی رابطہ شہناز سے نہیں ہوا ہے

اور نہ ہی میں نے اس کو مدد ملنے اور نہ مجھے
کاٹنا ہے اور اس نذر سے مجھے کوئی رابطہ نہیں ملتا ہے۔

23.6.2013



Attested
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

بیان ادا ان شاء اللہ
رائس افسر ساکس ایف ڈی

کمپیوٹر اینڈ سٹینڈرڈ کا تبادلہ رقم $\frac{10}{22}$ - 24 کو
ساکس ایف ڈی اور ہوا۔ اس کے بعد سٹینڈرڈ جی بی نے ساکس
میں کوئی اور / طرفی کمرہ کا طور پر نہیں کی تھی۔ اس کے
علاوہ میں نے سٹینڈرڈ جی بی کو کہیں بھی گھر پر سے
کا نہیں کیا ہے۔ اور نہ کیا ہے۔ دفتر نہ آئے
یہی میرا بیان ہے۔

تاریخ $\frac{06}{023}$ 21

بیان ادا ان شاء اللہ
رائس افسر ساکس ایف ڈی

Signature

Attested
Director
Forensic Science Laboratory
Khair Pur, Bahawalpur, Pakistan

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.

Attended
Forensic Services
Khyber Pakhtunkhwa, Peshawar

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

حکم نامہ زیر دفعہ 160/175 ض ف

بنام

مسماة شہناز دختر شریف گل زوجہ ابجد خان سابقہ کمپیوٹر اپریٹر سکنہ محلہ قدرت آباد ماجو کے ضلع چارسدہ پڑانگ حال سعید آباد
نمبر 2 نزد الصفا بیکری دلہ زاک روڈ پشاور 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 انسپیکٹر انوسٹی گیشن یونٹ سی پی او پشاور

7 - 8 - 2023

Attested
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

نوٹس ثانی

فارم (1)-2-25-PR

حکم نامہ زیر دفعہ 160/175 ض ف

نام

مسماة شہناز دختر شریف گل زوجہ اسد خان سابقہ کیسویٹر اپریٹر سکنہ محلہ قدرت آباد ماجو 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 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۔

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۔

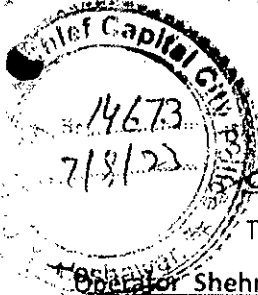
راغب خان انسپکٹر انوسٹی گیشن یونٹ سی پی او پشاور

16.08.2023

Attest
Director

Forensic Science Laboratory
Khair Pakhtunkhwa, Peshawar

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



This order will dispose-off the departmental appeal preferred by Lady Computer Operator Shehnaz of Investigation Unit CPO, Peshawar under the E&D Rules-2011 against the order of Director FSL, KP in which she was awarded major punishment of Removal from Service on the following allegations:-

Allegations:-

That she was posted to FSL, Peshawar vide order No.11486-89/EC/Inv: dated 24.10.2022. She was required to report/assume duties at FSL, but she inspite of reporting at her new place of posting slipped away and absented herself from duty for a period of 5-months and 15-days. She was continuously drawing her salary as usual. On pointation, she was subjected to departmental proceedings. On completion of proceedings, the charges levelled against her were proved and she was also found habitual absentee, malingerer in the discharge of duties and indiscipline. Being found guilty of the gross misconduct, she was awarded "Major Punishment of Removal from Service" and also ordered to recoup the amount being drawn by her during the absence period.

I have gone through the relevant documents/material placed on record which revealed that the appellant could not justify her prolonged & wilful absence from duty during the course of departmental proceedings despite being given full opportunity of self defence. Even during cross examination, she failed to satisfy the Enquiry Committee regarding her wilful absence. Upon the findings of the Committee she was issued Final Show Cause Notice to which she replied, but she again failed in producing any cogent justification regarding the charges levelled against her.

The undersigned also gave her proper opportunity of personal hearing. She was heard in person in detail, but she again failed to satisfy the undersigned in providing any plausible evidence in support of her wilful absence. The medical documents which she has produced after commencement of departmental enquiry are just to cover her absence period. Her previous office record also depicts her to be habitual absentee and an indisciplined official. Hence the charges against her were proved beyond any doubt.

In the circumstances mentioned above, the undersigned (competent authority) uphold the order issued by the Director FSL vide No.882-889/FSL, dated 18.07.2023 and the instant appeal is rejected.

(DR. ISHTIAQ AHMED MARWAT) PSP/PPM
Additional Inspector General of Police
Investigation, KP Peshawar.

No. 8788-90 /EC/Inv., dated Peshawar, the 05 /09/2023.

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

1. Director FSL Khyber Pakhtunkhwa, Peshawar.
2. All concerned.



SERVICES HOSPITAL PESHAWAR
GOVERNMENT OF KPK
OPD REGISTRATION

Name: SIENAZ Age: 28 Sex: FEMALE

Department: GENERAL OPD Address: PESHAWAR

Hospital Ventry No: 84091-23 Dated: 23-05-2023

History

SIENAZ

Physical Examination

General: Good
Vitals: Normal
HEENT: Normal
Chest: Clear
Abdomen: Soft
Extremities: Normal

Final Diagnosis

Acute Bronchitis
Asthma

Investigations

Avoid Spicy
and fried foods
and dust & smoke

DR. ASIF IZHAR
Physician Medical Specialist

Doctor on Duty: [Signature] Doctor's Signature: [Signature]

Attested
[Signature]
Faculty of Medicine, Peshawar



SERVICES HOSPITAL PESHAWAR GOVERNMENT OF KPK OPD REGISTRATION

Name: SHENAZ Age: 38 Sex: FEMALE

Department: GENERAL OPD Address: PESHAWAR

Hospital Yearly No: 00160-23 Date: 01-06-2023

History	R/-	6th mth of pregnancy
Request		of Cesarean
Clinical Examination		to
Abdominal		of Bicornuate
used		of Uterus
Provisional Diagnosis		Gr-1-2
Ascard		referred to SMB
Investigations		for further proceedings
		through proper channel

Attested
 Director
 Forensic Science Laboratory
 Khyber Pakhtunkhwa, Peshawar.

DR. ASIF IZHAR
 Physician Medical Superintendent
 Police & Services Hospital
 Peshawar

Poster on Duty

Doctor's Signature



SERVICES HOSPITAL PESHAWAR
GOVERNMENT OF KPK
OPD REGISTRATION

Name: SHENAZ Age: FEMALE
Department: GENERAL OPD A: PESHAWAR
Hospital Yearly No: 00460-23 DE: 06-2023

History	RI- 6th mth of pregnancy
Clinical Examination	Request of Cesarean Abnormal
Provisional Diagnosis	Use of Cesarean Ascard
Investigations	Ascard Last pregnancy Right hand to SMB for pres procedure through proper channel

Attested
[Signature]
[Stamp]

Doctor on Duty: DR. ASIF IZHAR
Physician (Medical Specialist)
Police & Services Hospital
Peshawar
Doctor's Signature: [Signature]

GOVERNMENT GENERAL HOSPITAL PESHAWAR
GOVERNMENT OF KPK
OPD REGISTRATION

NAME: SHENAZ Age: 28yr Sex: FEMALE

Address: PESHAWAR

GENERAL OPD Dated: 23-05-2023

History

Smritis pugil

Handwritten notes on the left side of the form, including names like 'Dr. Asif Iqbal' and 'Dr. Asif Iqbal'.

Alcedae

Ascorbis

2/2-2-2

Avoid Spicy and fried food and pungent herbs

DR. ASIF IQBAL
Assistant Medical Officer
Police & Services Hospital
Peshawar

Attested
Director
Forensic Medicine Laboratory
Government General Hospital Peshawar

40

10.50

SERVICES HOSPITAL PESHAWAR
GOVERNMENT OF KPK
OPD REGISTRATION

Name: ST. GUNAV Age: 27 Sex: FEMALE
 Department: GENERAL OPD Address: PESHAWAR
 Hospital Yearly No: 114105-22 Dated: 17-05-2022

History
 M/F = L/R
 G/P
 NO alive
 Issue
 Clinical Examination

R. No
 Refer to
 Curnee
 Lab.
 Tab febrile
 no @ - 2/10 @

B.P = $\frac{110}{70}$

Provisional Diagnosis

Tab Calc - 1000
 no @ - 2/10 @

Investigations

Obs U/L
 FBC

Curnee
 Digital
 P. & S. Medical Services Hospital

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

Attested
 Director
 Forensic Science Laboratory
 Khair Pakhtunkhwa, Peshawar

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 الراساؤنڈ سپیشلسٹ

Pt's Name Munira Age 37 Sex F Date 20/3/2022

To whom it may concern

I am writing to you regarding

my recent

visit to your clinic 3 months

ago about the episodic pain

in my lower abdomen

for which you advised me

to take the medicine

which you prescribed

Dr. Zubaida Akhtar

MBBS, MCPS
Gynaecologist & Sonologist

Room No: 320, Pak Medical Center
407th Street, Peshawar

ایڈریس: ریشاد کلینک نمبر 320، پیک میڈیکل سنٹر، خیبر بازار ریشاد۔

سہولت کار روزانہ 10:00 تا 2:00 بجے دوپہر (پیر سے جمعہ)

0315-9245406
0312-5098679

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

Attested
Director
Forensic Science Lab
Khyber Pakhtunkhwa

زیبده اختر

ایم بی بی ایس، ایم سی پی ایس (گائنی)

گائنا کالوجسٹ اینڈ الٹراساؤنڈ سپیشلسٹ

Zubaida Akhtar

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

Gynaecologist & Ultrasound Specialist



Pt's Name Munira Age 34 Sex F Date 20/5/2020

ULTRASOUND REPORT

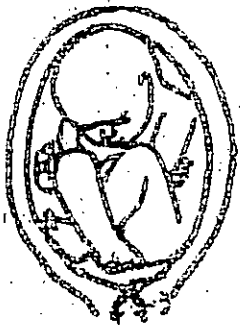
ULTRASOUND FINDINGS



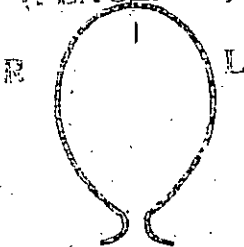
Transverse



Breech (Held Up)



(PLACENTA)



Ant



No of Foetuses One/TWO/Three
 Lie Longitudinal/transverse/Oblique
 Presentation Foetal Cephalic / Breech
 Movements: Present / Absent
 Size Of gestational SacCm
 Crown Ramp LengthCm
 Biparietal DiameterCm
 Femur LengthCm
 Abdominal Circumference/DiameterCm
 Gestational age on measurementCm
 Amount of liquor adequate/scanty/excess

Comments

Fw: 1

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.

Dr. Zubaida Akhtar
 MBBS, MCPS
 Gynaecologist & Sonologist
 Room No. 320, Pak Medical Center
 Khyber Bazar Peshawar.

0307-5364660
 0311-9475068

ایڈریس: صوابی چلی گاوں، تحصیل چھوٹا لالا ہور، ڈسٹرکٹ صوابی۔
 اوقات کار: 7:00-9:30 بجے شام (صرف بروز اتوار)

0315-9245406
 0312-5098679
 091-2213546

ایڈریس: پشاور، کلنگ نمبر 320 تھرڈ فلور، پاک میڈیکل سنٹر، خیر بازار پشاور۔
 اوقات کار: روزانہ 10:00-2:00 بجے دوپہر (پیر سے ہفت)

Attested

Forensic Science Laboratory
 Khyber Pakhtunkhwa, Peshawar

Lady I

Zubaida Akhtar

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

Gynaecologist & Ultrasound Specialist



37
لیڈی ڈاکٹر زبیدہ اختر (48)

ایم بی بی ایس، ایم سی پی ایس (گائنی)

گائناکالوجسٹ اینڈ اولٹراساؤنڈ سپیشلسٹ

Pt's Name Shamim Age 28y Sex F Date 19/11/2013

To whom it may concern

I am writing to you regarding Mrs. Shamim

who has been referred to me for

ultrasound examination of the

uterus and ovaries. She is a

30-year-old lady who is

married and has one child.

She is currently pregnant and

is a case of Twinning of the

Dr. Zubaida Akhtar
MBBS, MCPS
Gynaecologist & Sonologist
Room No. 329, Pak Medical Center
Bazaar Peshawar

ایڈریس: پشاور کلینک نمبر 320، پاک میڈیکل سنٹر، خیبر بازار پشاور

اوقات کار: روزانہ 10:00 تا 2:00 بجے دوپہر (پیر سے جمعہ)

ایڈریس: الحرمہ گرین نزد جھنگڑا سٹاپ مین جی ٹی روڈ

اوقات کار: 4:00 تا 8:00 بجے شام (پیر سے جمعہ)

0315-9245406
0312-5098679

Attested

Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

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 الزاساؤنڈ سپیشلسٹ

Pt's Name | Smeeraq | Age 27 | Sex F | Date 12/11/2022

To whom it may concern

This is to certify that Smeeraq
is a wife of Mr. [Name] and she is
a resident of [Address].
I hereby certify that she is
a single woman and she is
not married to any other person.
I am a doctor and I am
certifying this for the purpose
of [Purpose].
Signature of Dr. Zubaida Akhtar

Dr. Zubaida Akhtar
MBBS, MCPS
Gynaecologist & Sonologist
Rock Road, Pak Medical Center
Khyber Pakhtunkhwa, Pakistan

ایڈریس: ایف ایم سی پی ایس، پاک میڈیکل سنٹر، خیبر بازار پشاور۔
اوقات کار: روزانہ 2:00 تا 4:00 بجے دوپہر (پیر سے جمعہ)
ایڈریس: الحرمہ گرین نزد جھگڑا شاپ مین جی ٹی روڈ
اوقات کار: 4:00 تا 8:00 بجے شام (پیر سے جمعہ)

0315-9245406
0312-5098679

Attested
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar



Northwest General
Hospital & Research Centre

Dr. Aziz Ur Rahman (45)

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@nwg.hk

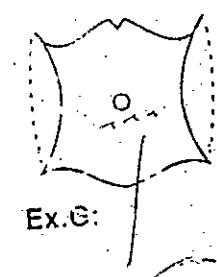
PM&DC Reg. No: 2631-N

Date: 1-11-2011

Patient Name: Shehwar شہوار Age 29 Sex: Female

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

Hx: C/flu-like pain - 2 weeks
C/O: Colic episodic, cont. dull - 1.5 months -
Inappropriate Tenderness
fever: +ve in chills/ Rigors
vomiting: 4/day



Last episode - 4M Ago
w/s. @ Nole H/DN
P. B. Middle
Abn NT

Ex.G: +ve
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

Adv. Ar

CBC
R. FT
Umic
CRP

Follow up Umic
Report

1/2 Canale.
Dry Subsonic 2gm 1/2 x BD
w/o (ATI)

Tea Digestion
w/o (Test dose in E)

Complete Bed rest for 16 days
w/o

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
A Project of ALLIANCE HEALTHCARE (Pvt) Ltd

منشی / ماہ بعد معائنہ کیلئے تشریف لائیں۔

Attested

Forensic Laboratory
Khyber Pukhtunkhwa, Peshawar



DISCHARGE SUMMARY

Medical Record Number: K0200004157881
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: K0222000080987
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. rabal

FINDINGS: A/M male baby with A/S 8/10, 10/10 delivered as cephalic grade 3 msl
1st term lie lng pp cephalic

ov 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 & FACKS 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 TFC
DRAIN TFC
CATHETER 24 HOURS
INJ SULZONE 2GM I/V BD (ATU)
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 ATD FOR 2 DAYS
- INJ heparin 7500 IU S/C OD for 2 days ther
- 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

Attested

Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar

Instructions:

TREATMENT IN HOME

- 1. Orals Azithromycin 1x10
- 2. Orals Cloxacillin 750mg
- 3. 1x10
- 4. 1x10
- 5. Orals Dupre-stone
- 6. (X 20) - 1 month
- 7. 1x10
- 8. 1x10
- 9. Orals Cloxacillin 200mg
- 10. S/c Daily
- 11. 1x10
- 12. 1x10
- 13. 1x10
- 14. 1x10
- 15. 1x10

Completed Bed 2 weeks

[Signature]

Director
 Forensic & Public Laboratory
 Khyber Pakhtunkhwa, Peshawar



Govt. of Khyber Pakhtunkhwa

DISCHARGE SLIP

Admission No. 10/115

Ward Cyrene Bed No. (3)

Name of Patient Shehina

Father's Name Asadullah

Age 29 yrs Sex F

Address Sultan Colony No. 2 Dala Saeed Road

Date of Admission 28/12/21

Time of Admission 10:00 AM

Date of Discharge 7/2/22

Diagnosis Cyrene Lower POC with renal

Condition Self-recovery

INVESTIGATIONS

- 1. RBC 102 mfl cell
- 2.
- 3. urine R/E 6-8 Pus cells
- 4.
- 5. Hb 11.4 gm/l cell
- 6.
- 7.
- 8.
- 9.
- 10.
- 11.
- 12.
- 13.
- 14.
- 15.

TREATMENT IN HOSPITAL

- 1. Tab. Adfoin 1x0D
- 2. Tab. Dexametson
- 3. 1x8D - 1 month
- 4. Tab. Loflin 25mg
- 5. 1x0D - 1 month
- 6. Inj. Clexane 40mg
- 7. S/c daily
- 8.
- 9.
- 10.
- 11.
- 12.
- 13.
- 14.
- 15.

Admitted
 1st 3rd 5th 7th 9th 11th 13th 15th 17th 19th 21st 23rd 25th 27th 29th 31st
 1st 3rd 5th 7th 9th 11th 13th 15th 17th 19th 21st 23rd 25th 27th 29th 31st

1/2

48



"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 Shenwaz Date 3/7/2012
 Age / Sex 26y / F M.R. #. 21-2010 Room No/ Ward/ Bed No 5/
 Date of Admission 3/7/2012

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.
 آپریشن کے دوران ناگزیر حالات میں مندرجہ بالا آپریشن کے علاوہ دوسرے آپریشن کی بھی اجازت ہے۔

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.
 میں ہر قسم کی بے ہوشی کے لیے رضامند ہوں۔

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.
 آپریشن کے متعلق کسی قسم کی گارنٹی نہیں دی جاسکتی۔

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.
 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۔

I agree with the conditions
 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. _____
 Name _____ Relation _____ Sig. _____

Attested
 Forensic Science Laboratory
 Khyber Pakhtunkhwa, Peshawar

50

Patient Copy

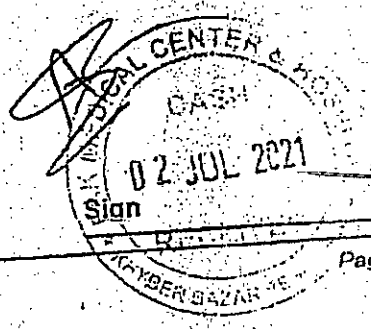
Receipt

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

Medical Record No. 21-20119
 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

Attested

FOR MIC...
 Khyber P...
 30

51

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 Maimoona 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

اپنی مری ڈوپسٹاٹ
ایک گرونگ بول
اپنی لیجے لیکر ڈوس

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

Attested

Forensic Science Laboratory
Khyber Pukhtunkhwa, Peshawar



Northwest General Hospital & Research Centre

Dr. Aziz Ur Rahman

MBBS, FRCO, FRCR, D.M. (Gen. Med.), FRCR (Gen. Med.)
FRCR (Gen. Med.) (FRCR) (Gen. Med.)
Consultant General & Infectious Diseases
Hospital & Public Health Department
Northwest General Hospital
F-7/3, D.H. Road, Peshawar, Pk. 25100
Cell: 3551 476533, Email: azizurrahman@nwgc.org.pk

PHARMAC No. 1031-4

Date: 1-11-2020

Patient Name: Mohamud Age: 29 Sex: Male

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

Hx: Chronic pain - recurrent

CIC: Chronic ep. colic, cont. dull - 1.5 hr in the
propagative Tenderness
fever - 4-5 chills/fever
relieving: 4/day

O/E: Distal ep. colic - 4M Ago
up. @ Mod. HD
in middle
abnt

Ex.G: (diagram of abdomen showing epigastrium)

DRE: (diagram of rectum)
A: Numerous pus cells
11-12 leukocytes

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

Creat
 Col. +Uric Acid
 HBAIC
 Uroflow
 Echo

The 15th
Adh
CBC
R FT
Urea
CRP

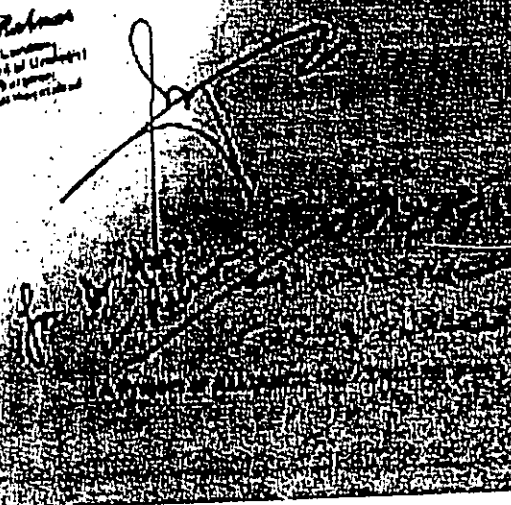
Following report

1/10 Cantile
2mg Subson 2gm 1/2 x 2
(Test done)

Ten Dinges

Complete Bed rest for

Dr. Aziz Ur Rahman
FRCO, FRCR, D.M. (Gen. Med.)
Consultant General & Infectious Diseases
Northwest General Hospital



Attested

Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar



Northwest General Hospital

Dr. Aziz Ur Rahman

Medical Officer, P. U. D. Hospital, Peshawar
Consultant General & Public Health
Section 5, Phase 5, Hayatabad, Peshawar
P. U. D. Hospital, Peshawar, P. U. D. Hospital
P. U. D. Hospital, Peshawar, P. U. D. Hospital

PHASDC Reg. No. 10258

Date: 1-11-2011

Age: 27 yrs

Patient Name: Shahzad

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

Hx: Chronic pain - 2 months

C/O: Chronic pain, cont. dull - 1.5 months
Intermittent tenderness
fever etc. 2-3 times/ days
Intermittent 4/ day

O/E: Joint swelling - 4th finger
at 1st Met. J. P. U. D. Hospital
at 1st Met. J. P. U. D. Hospital

Ex.G: U.A. Microscopic Pus cells
11-12 Red cells

DRE: Flx. 1/2

Adv. Anti

- U.S. Renal
- U.S. Abd. + Pelvis
- KUB
- CT-XUB
- U. R/E
- CBC
- Urea
- HBS+HCV
- RBS/ FBS
- PSA
- ECG
- Creat
- Cal. + Uric Acid
- HBAIC
- Uroflow
- Echo

1/2 Counts
277 Subsonic 2 gm 1/2 2.80
W/O (Tardive)
Tea Dringing
W/O

Comp late blood sent for HbA1c

Shahzad, P. U. D. Hospital
P. U. D. Hospital, Peshawar, P. U. D. Hospital
P. U. D. Hospital, Peshawar, P. U. D. Hospital

Urine/c/s
follow up

Noted

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR**SERVICE APPEAL NO. 1753/2023**

Mst; Shehnaz Ex-Computer Operator (BPS-16) CCPO, Office Peshawar.

(Appellant)**VERSUS**


Addl: Inspector General of Police, (HQrs) Khyber Pakhtunkhwa, Peshawar & others

(Respondents)**AFFIDAVIT**

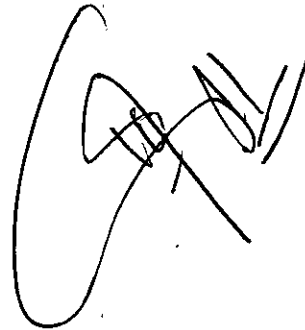
I, Waqar Ahmad PSP, Director FSL, Peshawar do hereby solemnly affirm on the oath that the contents of Para-wise comments/reply in the above captioned Service Appeal on behalf of Respondents are correct to the best of my knowledge and belief. Nothing has been concealed from this Honourable Tribunal.

It is further stated on the oath that in this appeal, the answering respondents have neither been placed ex-parte nor defense has been struck off.

DEPONENT


(WAQAR AHMAD) PSP
DIRECTOR
 Forensic Science Laboratory
 Peshawar.
 CELL: 0335-9768886
Director
Forensic Science Laboratory
Khyber Pakhtunkhwa, Peshawar




 04-03-2024

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

SERVICE APPEAL NO. 1753/2023


Mst; Shehnaz, Ex-Computer Operator (BPS-16) ,CCPO, Office Peshawar.
(Appellant)

VERSUS

Addl: Inspector General of Police, (HQrs) Khyber Pakhtunkhwa Peshawar & others
(Respondents)

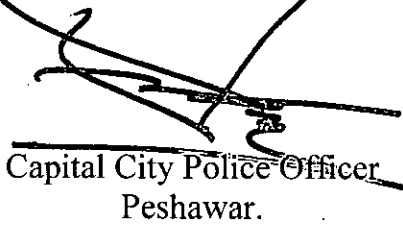
AUTHORITY LETTER

Muhammad Irshad Khan DSP FSL, Peshawar is authorized to submit Para-wise Comments/Reply and defend above captioned Service Appeal on behalf of respondents in Honorable Khyber-Pakhtunkhwa Service Tribunal, Peshawar.


Director Forensic Science Laboratory,
Khyber Pakhtunkhwa, Peshawar.


Respondent No. 4

(WAQAR AHMAD)PSP
Incumbent


Capital City Police Officer
Peshawar.

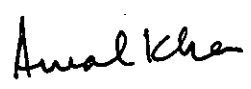
Respondent No. 5

(SYED ASHFAQ ANWAR)PSP
Incumbent


Deputy Inspector General of Police,
Investigation Khyber Pakhtunkhwa,
Peshawar.

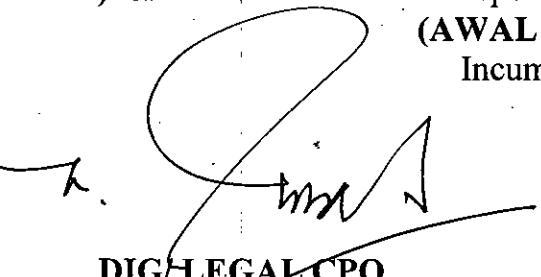
Respondent No. 3

(ZAIB ULLAH KHAN)PSP
Incumbent


Addl: Inspector General of Police,
(HQrs.) Khyber Pakhtunkhwa
Peshawar.

Respondent No. 1

(AWAL KHAN)PSP
Incumbent



DIG-LEGAL,CPO

For :Inspector General of Police,
Khyber Pakhtunkhwa
Peshawar.

Respondent No. 2

(DR. MUHAMMAD AKHTAR ABBAS) PSP
Incumbent