

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1588/2019

Date of Institution ... 26.11.2019

Date of Decision ... 21.01.2022

Imran Ex: Head Constable No. 3201, FRP Peshawar range, Peshawar.  
... (Appellant)

**VERSUS**

The Registrar for Inspector General of Police Khyber Pakhtunkhwa Peshawar and  
others. ... (Respondents)

Syed Noman Ali Bukhari,  
Advocate ... For Appellant

Asif Masood Ali Shah,  
Deputy District Attorney ... For respondents

**AHMAD SULTAN TAREEN** ... **CHAIRMAN**  
**ATIQU-UR-REHMAN WAZIR** ... **MEMBER (EXECUTIVE)**

**JUDGMENT**

**ATIQU-UR-REHMAN WAZIR MEMBER (E):-** Brief facts of the case are that the appellant while serving as Constable in Police Department, was proceeded against on the charges of absence from duty and was ultimately dismissed from service vide order dated 03-04-2019. Feeling aggrieved, the appellant filed departmental appeal dated 02-05-2019, which was rejected vide order dated 16-05-2019. The appellant filed revision petition dated 10-06-2019, which was also rejected vide order dated 29-10-2019, hence the instant service appeal with prayers that the impugned orders dated 03-04-2019, 16-05-2019 and 29-10-2019 may be set aside and the appellant may be re-instated in service with all back benefits.

02. Learned counsel for the appellant has contended that the impugned orders are against law, facts and norms of natural justice, therefore, not tenable and liable to be set aside; that the impugned order was issued with retrospective effect, which was void in the eye of law and according to Superior Courts judgment reported as 2002 SCMR 1129 and 2006 PLC CS 221; that no regular inquiry was conducted and the appellant was not afforded opportunity to defend his cause; that the inquiry was dispensed with, but there is no order in black & white, which is violation of law and rule, hence the whole procedure conducted is nullity in the eye of law; that absence of the appellant was not willful but was due to compelling reason of illness of his father and to this effect, the appellant had submitted medical prescriptions, which were required to be verified from the concerned quarters, but such stance of the appellant was not taken into consideration; that the appellant was discriminated as another similarly placed employee namely Umar Khan was re-instated but case of the appellant was not considered.

03. Learned Deputy District Attorney for the respondents has contended that the appellant remained absent from lawful duty with effect from 21-12-2018 till his removal from service on 03-04-2019 without permission of the competent authority; that the appellant is a habitual absentee and always taking the plea of illness of his father, which is not correct; that proper charge sheet/statement of allegation was served upon the appellant, but the appellant did not respond; that proper inquiry to this effect was conducted but the appellant failed to join inquiry proceedings, hence he was proceeded ex-parte and was awarded with major penalty of dismissal from service vide order dated 03-04-2019; that final show cause notice was served upon the appellant but the appellant did not turn up, hence such notice was published in newspapers but again he remained silent; that departmental appeal as well as revision petition of the appellant were thoroughly examined and rejected on sound grounds.

04. We have heard learned counsel for the appellant and have perused the record.

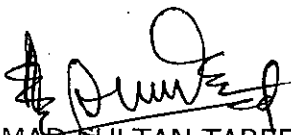
05. The impugned order would suggest that the appellant was proceeded against on the ground of absence for the mentioned period, however the authority has treated the mentioned period as leave without pay, as such the very ground, on the basis of which the appellant was proceeded against, has vanished away and the appellant cannot be penalized for the absence, which was regularized by the respondents themselves and on this score alone, the impugned order is liable to be set aside. Wisdom in this respect derived from the judgment of the august supreme court of Pakistan, reported as 2006 SCMR 434 and 2012 TD (Services) 348.

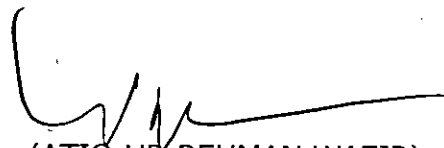
06. Record reveals that the appellant was dismissed from service on the allegation of absence from duty. The appellant filed departmental appeal, which was also rejected. The appellant has taken the stance of illness of his father and presented a huge record pertaining to illness of his father before this tribunal, but the respondents did not take into consideration illness of his father. Record would suggest that the appellant was proceeded against in absentia and nothing is available on record to suggest that charge sheet/statement of allegation was served upon the appellant. Similarly, no regular inquiry was conducted against the appellant; hence, the appellant was kept deprived of the opportunity to defend his cause. Even otherwise, regular inquiry is must before imposition of major penalty of dismissal from service, which however was not done in case of the appellant. The Supreme Court of Pakistan in its judgment reported as 2008 SCMR 1369 has held that in case of imposing major penalty, the principles of natural justice required that a regular inquiry was to be conducted in the matter and opportunity of defense and personal hearing was to be provided to the civil servant proceeded against, otherwise civil servant would be condemned unheard and major penalty of dismissal from service would be imposed upon him without adopting the required mandatory procedure, resulting in manifest injustice.

07. The appellant was not guilty of charges of gross misconduct or corruption, therefore extreme penalty of dismissal from service for the charge of absence is on higher side, hence, quantum of the punishment needs to be reduced. Reliance is placed on 2006 SCMR 1120. Careless portrayed by the appellant was not intentional, hence cannot be considered as an act of negligence which might not strictly fall within the ambit of misconduct but it was only a ground based on which the appellant was awarded major punishment. Element of bad faith and willfulness might bring an act of negligence within the purview of misconduct but lack of proper care and vigilance might not always be willful to make the same as a case of grave negligence inviting severe punishment. Philosophy of punishment was based on the concept of retribution, which might be either through the method of deterrence or reformation. Reliance is placed on 2006 SCMR 60.

08. We have observed that charge against the appellant was not so grave as to propose penalty of removal from service, such penalty appears to be harsh, which does not commensurate with nature of the charge. The appellant has admitted his absence but such absence was not willful, which does not constitute gross misconduct entailing major penalty of removal from service. In view of the foregoing discussion, the instant appeal is partially accepted. The penalty of removal from service is converted into minor penalty of stoppage of increment for one year and the intervening period is treated as leave without pay. Respondents however, are at liberty to conduct inquiry, if they so desire. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED  
21.01.2022

  
(AHMAD SULTAN TAREEN)  
CHAIRMAN

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (E)

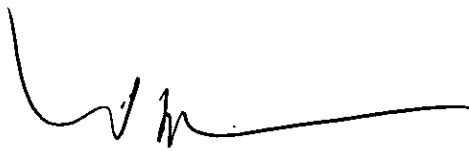
ORDER  
21.01.2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the instant appeal is partially accepted. The penalty of removal from service is converted into minor penalty of stoppage of increment for one year and the intervening period is treated as leave without pay. Respondents however, are at liberty to conduct inquiry, if they so desire. Parties are left to bear their own costs. File be consigned to record room:

ANNOUNCED  
21.01.2022

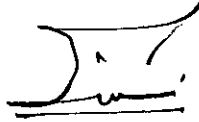
  
(AHMAD SULTAN TAREEN)  
CHAIRMAN

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (E)

20.10.2021

Appellant alongwith his counsel Syed Noman Ali Bukhari, Advocate present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant requests for further time to prepare the brief. Request is accorded. To come up for arguments on 11.01.2022 before D.B.



(Salah-Ud-Din)  
Member (Judicial)




Chairman

12.01.2022

Miss Uzma Syed, Advocate junior of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Former made a request for adjournment as senior counsel for the appellant has proceeded to his home due to some emergency. Request is accorded. To come up for arguments before the D.B on 21.1.2022.



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

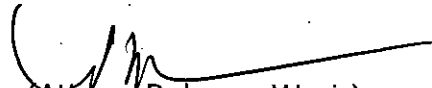


Chairman

14.01.2021

Appellant with counsel and Mr. Asif Masood, DDA alongwith Ihsanullah, ASI for the respondents present.

Learned counsel for the appellant seeks time to further prepare the brief. Adjourned to 08.03.2021 for hearing before D.B.

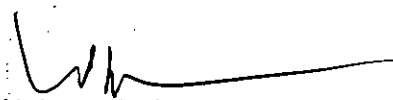
  
(Atiq-ur-Rehman Wazir)  
Member(E)

  
Chairman

08.03.2021

Junior to counsel for the appellant and Asif Masood Ali Shah, DDA for the respondents present.

Former requests for adjournment due to engagement of learned senior counsel before the Honourable High Court in many cases today. Adjourned to 15.06.2021 for hearing before the D.B.

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


  
Chairman

15.06.2021

Clerk to counsel for appellant present.

Asif Masood Ali Shah learned D.D.A for respondents present.

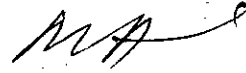
Lawyers are on general strike therefore, case is adjourned. To come up for arguments on 20.10.2021 before D.B.

  
(Rozina Rehman)  
Member (J)

  
Chairman

10.03.2020

Appellant in person and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Ihsan, S.I for the respondents present. Representative of the department submitted written reply on behalf of respondents No. 1 to 3. The same is placed on record. To come up for rejoinder, if any, and arguments on 02.04.2020 before D.B.



(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

02.04.2020

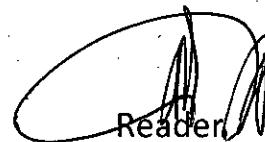
Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 28.08.2020 before D.B.



Reader

28.08.2020

Due to summer vacation, the case is adjourned to 04.11.2020 for the same as before.

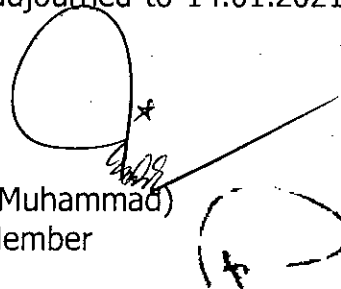


Reader

04.11.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 14.01.2021 for hearing before the D.B.



(Mian Muhammad)  
Member



Chairman



01.01.2020

Counsel for the appellant present.

Contends that on 22.02.2019 the appellant made himself available for duty and was accordingly deputed at Judicial Complex. On the other hand, the final show cause notice on account of absence from duty was served upon him on 05.03.2019. Similarly, in the impugned order dated 03.04.2019 it was erroneously noted that the appellant was absent from 21.12.2018 till date. In that manner, the alleged absence of appellant was enlarged to a period when he validly performed duty.

Subject to all just exceptions, instant appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 11.02.2020 before S.B.

Appellant Deposited  
Security Process Fee

01/01/20



Chairman

11.02.2020

Appellant in person and Mr. Kabirullah Khattak, Additional AG alongwith Mr. Ihsanullah, ASI for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department requested for time to file written reply/comments. Case to come up for written reply/comments on 10.03.2020 before S.B.

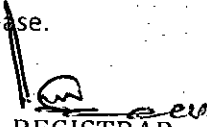
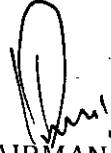
MA  
(MUHAMMAD AMIN KHAN KUNDI)  
MEMBER

Form- A

# FORM OF ORDER SHEET

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

Case No.- 1588 /2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/11/2019	<p>The appeal of Mr. Imran Khan resubmitted today by Syed Noman Ali Bukhari Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	28/11/19.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>01/01/2020.</u></p> <p style="text-align: right;"> CHAIRMAN</p>

114

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 1588 /2019

Imran Khan

V/S

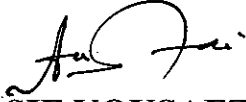

Police Deptt:

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1.	Memo of Appeal	-----	1-4
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3.	copy of inquiry report	-B -	6
4.	Copy of roznamcha	-C-	7-11
5.	Copy publication	-D-	12
6.	Copy of show cause	-E-	13
7.	Copy of impugned order	-F-	14
8.	Copy of departmental appeal	-G-	15
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10.	Copy of review petition	-I-	17
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عمران  
**APPELLANT**  
Imran Khan

THROUGH:

  
**M. ASIF YOUSAFZAI**  
**ADVOCATE SUPREME COURT**  
  
**SYED NOMAN ALI BUKHARI**  
**Advocate, High Court**  
**Peshawar**

0306 51094 38.

Date: 25.11.2019

**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

APPEAL NO. 1588 /2019

Imran Ex. Head Constable No.3201,  
FRP Peshawar range, Peshawar.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1681

Dated 26/11/2019

.....(Appellant)

**VERSUS**

1. The Registrar For inspector General of Police, KP. Peshawar.
2. The Commandant Frontier Reserve Police, KP, Peshawar .
3. The Superintendent Of Police, Frontier Reserve Police, peshawar Range, Peshawar,.

.....(Respondents)

**APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 03.04.2019 WHEREBY, THE APPELLANT HAS BEEN REMOVED FROM SERVICE AND AGAINST THE REJECTION ORDER DATED 16.05.2019 WHEREBY THE DEPTT APPEAL OF THE APPELLANT HAS BEEN REJECTED AND AGAINST THE REJECTION ORDER DATED 29.10.2019 WHEREBY THE REVIEW PETITION UNDER 11-A HAS BEEN REJECTED FOR NO GOOD GROUNDS.**

**Filed to-day**

**Registrar.**

26/11/19

**PRAYER:**

**THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDERS DATED 03.04.2019, 16.05.2019 and 29.10.2019 MAY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND**

**APPOPRIATE THAT MAY ALSO BE AWARADED IN  
FAVOUR OF APPELLANT.**

**RESPECTFULLY SHEWETH:**

**FACTS:**

Facts giving rise to the present service appeal are as under:

1. That the appellant was appointed as Constable in Police force and the appellant was performed his duties with entire satisfaction of his superiors.
2. That the father of the appellant had been seriously ill and due to which appellant didn't performed his duties so the absentia of the appellant was not willing full but due to above mentioned reasons.
3. That, the appellant was charge sheeted on 15.01.2019 and improper inquiry was conducted against the appellant without providing any chance to the appellant. **Copy of charge sheet and inquiry report is attached as annexure-A & B.**
4. That the appellant was attended his duty on 21.02.2019 which was evident from the Roznamcha but despite that on 22.02.2019 the appellant was shown absent and absent notice was publish in newspaper despite that the appellant was on duty. Thereafter, the show cause notice was issued to the appellant and the appellant was shown absent. **Copy of roznamcha, publish notice and show cause are attached as annexure-C, D & E.**
5. That thereafter, the impugned order dated 03.04.2019 was passed against the appellant whereby the appellant was removed from service. The appellant been aggrieved from the impugned dismissal

order preferred departmental appeal on 02.05.2019 which was rejected vide order dated 16.05.2019. Thereafter, the appellant filed review petition on 10.06.2019 but the same has been rejected vide order dated 29.10.2019 quite astonishingly on ground of time barred. **(Copy of impugned order. departmental appeal, rejection order, review petition and rejection order is attached as Annexure-F, G, H, I & J).**

6. That now the appellant come to this august Tribunal on the following grounds amongst others.

**GROUND:**

- A) That the impugned orders dated 03.04.2019, 16.05.2019 and 29.10.2019 is against the law, facts, norms of justice and void-ab-initio as has been passed with retrospective effect and material on record, therefore not tenable and liable to be set aside.
- B) That the impugned order was retrospective order which was void in the eye of law and according to Superiors Court Judgment reported as 2002 SCMR, 1129 and 2006 PLC 221.
- C) That there is no order in black and white form to dispense with the regular inquiry which is violation of law and rules and without proper inquiry the appellant was dismissed from the service vide order dated 05.12.2014 without given personal hearing with retrospective effect which is necessary and mandatory in law and rules before imposing major penalty. So the whole procedure conducted has nullity in the eye of law. So the impugned order is liable to be set aside.
- D) That the medical certificated must be referred to medical board to examine and dig out the truthfulness on the medical certificated but the deptt failed to follow this process and therefore it is requested the case may be remanded to deptt to conduct denovo enquiry by providing full opportunity to the appellant to meet the end of justice.
- E) That the appellant has been condemned unheard and has not been treated according to law and rules.
- F) That no show cause notice was served upon the appellant nor inquiry was conducted against the appellant, which was necessary


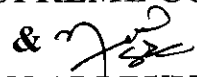
and mandatory in law before imposing major punishment which is violation of law, rules and norms of justice.

- G) That according to superior court and this Hon'ble Tribunal judgment any order passed without following mandatory provisions of laws is void ab initio.
- H) That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on this score alone.
- I) That the absent of the appellant was not intentionally but due to serious illness. So the penalty imposed upon the appellant was so harshed.
- J) That the appellant has been discriminated because the another employee namely Umar Khan on same footing already reinstated by the department but same relief was refused to the appellant which is violation of article 25 and 4-A and bad in eye of law.
- K) That the appellant's guilt has not been proved beyond the shadow of doubt and the appellant has been punished on the basis of conjecture and surmises.
- L) That no chance of personal hearing was provided to the appellant and as such the appellant has been condemned unheard throughout.
- M) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

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

حکومت  
**APPELLANT**  
Imran Khan

THROUGH:

  
(M. ASIF YOUSAFZAI)  
**ADVOCATE SUPREME COURT**  
&   
**SYED NOMAN ALI BUKHARI**  
Advocates, High Court  
Peshawar

Annex - A

5

**CHARGE SHEET U/R 6(1)(A) NWFP (NOW KHYBER PAKHTUNKHWA)**  
**POLICE RULES 1975.**

You Constable Imran No.3201 posted at FRP/Peshawar Range Peshawar is hereby charged for committing the following Omission/Commissions.


Constable Imran No.3201 of FRP Peshawar Range, remained absent from lawful duty w.e.from 21.12.2018 till to date without taking any leave/permission from the Competent Authority.

You are hereby called upon to submit your written defence against the above charged before the enquiry officer.

Your reply should reach to the enquiry officer within (7) days from date of receipt of this charge Sheet, failing with Ex-part proceeding shall be initiated against you.

**SUMMARY/STATEMENT OF ALLEGATION**

Constable Imran No.3201 of FRP Peshawar Range, remained absent from lawful duty w.e.from 21.12.2018 till to date without taking without any leave/permission from the Competent Authority. Your reply should reach to the enquiry officer within (7) days from date of receipt of this charge Sheet, failing with Ex-part proceeding shall be initiated against you.

  
Superintendent of Police, FRP  
Peshawar Range, Peshawar.

01/06/19 | 315

173019830393-1  
21.12.19

  
**ATTESTED**



ص۔ عالیہ کوالہ چارج شیٹ نمبری 06/PA  
 05/01/19  
 لیسٹ۔ عمران بزم 03 معروفی خدمت سے۔ چارج شیٹ نمبری  
 ریش میں DF-2 خانہ کی ریکورڈ کو طلب کرتے چارج شیٹ نمبری 06/PA  
 حوالہ دی DF-2 صورتہ نے کوالہ فور 05 روزنامہ 05/01/19 بوقت لیسٹ۔ روائلٹی کی  
 نقل کے لئے نے والیسی رپورٹ میں بیان کی کہ اس کے بھائی چارج شیٹ نمبری  
 کس دستخط سے لیسٹ کی۔ گوڈہ الزام علیہ نے جو اب ادیا اور نہ دالہ کیا اس بنا  
 پر DF-2 لیسٹ۔ گوڈہ بارہ برطین کی کہ کمانڈ کے ذریعے مذکورہ سے لیسٹ کے سر  
 اس نے کوالہ فور 05 روزنامہ 05/01/19 بوقت الزام علیہ سے ہی اس روائلٹی کی۔ کوالہ  
 فور 06 روزنامہ 06/01/19 بھراہ نقل سے 05 روزنامہ 06/01/19 کمانڈ بھونڈی جی گول آباد لکھ  
 قذافی سے میں یوں بیان کیا کہ جسٹس لیسٹ۔ عمران گھر جوڈ میں نہ آجھو جوڈ پائس  
 کے بھائی سے ہی کاحراں کو چارج شیٹ حوالہ کی۔ یہاں قابل ذکر ہے کہ  
 HC مذکورہ ذمہ دار فریڈ سے نے کی رپورٹ میں غیر ذمہ دارانہ لکھ کر لگا ہے۔  
 دیکھ جائیے طور نقل کے لئے نے یہ فراری کیا ہے۔ اسلئے HC مذکورہ کے  
 چارج شیٹ بند فریڈ سے اظہارات میں مشنری کرتے کی رپورٹ لیسٹ گن آرٹس  
 ہے۔ مزید فلک و مشنری بالہ اقول ہے۔

محمد طاہر  
 RESIDENT INSPECTOR  
 12/01/19

ATTESTED

در 19 روزی 21 12 / 18

Annex - C  
28

از دفتر در لیس (7)  
(2)

در 19 گت ملرزوان احسان الله صاوت 07:25 غ 18/12/18  
گت ملرزوان کیگه بدوران گت عمران 320  
موبو دیباگی حیکه خلوت راجوت غیر حاضری دن روزی گت

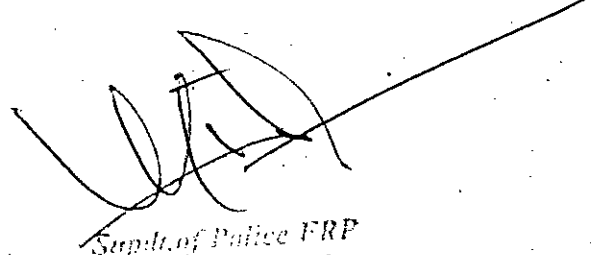
ضابطہ  
نقل مطالبہ لیس

سینا - والہ  
تیسر  
در 12/12/18  
غیر حاضری نقل - در لیس  
ارسال - در لیس

AMHC PC  
28/12/18

RESERVE INSPECTOR  
FRP PESHAWAR RANGE  
PESHAWAR  
08-01-19

Pay stop &  
Conduct Departmental Inquiry  
Issue Charge Sheet & Summary of Allegations

  
Suplt. of Police FRP  
Peshawar Range, Peshawar  
08-01-2019

ATTACHED

FRP/Range Pesh  
OR 30  
Dated 08/01/19

$\frac{20}{12} = \frac{5}{3}$

...

$\frac{5}{12}$

$198 \text{ cm}^2$  ...

...

$A = \frac{22}{192} \times 35 \times 21 \times \frac{2}{19}$

$A = \frac{19}{32} \times \frac{13}{20} \times 804$

...

$A = \frac{19}{32} \times \frac{13}{20} \times 804$

(8)

8

(9)

وزیر دفتر صدر اعلیٰ

22 م 22/02/19

صاحب کلام

22 م وزیر سجاد علی صاحب وقت 22/02/19

کو طلبہ 5146 بزرگ و صاحب کیا کو برصغیر دیکھنا جوڈیسیل کالج  
پہاڑی صاحب پور

صاحب عالی

صاحب عالی صاحب

*[Handwritten signature]*

MASIR

191114

ATTACHED



از دستم برود

۲۴ فروردین ۱۳۹۳ ۰۳/۰۵/۱۹

(۱۱)

مهره پادشاه

۲۴ فروردین ۱۳۹۳ ساعت ۰۷:۳۰ وقت ۰۳/۰۵/۱۹  
۲۰۱  
۴۷

کوتاه شده است جهت وصول کسب کرده  
رسانه به صورت مناسب صورت

فنا عالی

مهره پادشاه

۲۳ فروردین ۱۳۹۳ ۰۳/۰۵/۱۹

۲۳ فروردین ۱۳۹۳ ساعت ۰۷:۳۰ وقت ۰۳/۰۵/۱۹  
۲۰۱

کوتاه شده است جهت وصول کسب کرده  
رسانه به صورت مناسب صورت

فنا عالی

مهره پادشاه

MASI  
19/11/19

ATTESTED

Annex - B

www.dailyaaj.com.pk

پشاور ایبٹ آباد اور اسلام آباد سے بیک وقت شائع ہونے والا کثیر الاشاعت قومی روزنامہ

روشنی کی ضمانت، آج کا نصب العین

# اے

روزنامہ

ایڈیٹر  
عبدالواحد یوسفی

پشاور  
پاکستان

صفحہ 12

جلد 30 حصہ 22 فروری 2019-16 جاری الاٹنی 1440- قیمت 20 پیسے بے پیسے ایڈیشن شمارہ 46

ملی قوم کے حوصلوں پر (بانی سطر 10 بجے سب 79) کے زیر اہتمام ریجنل ماسٹرز کے مقابلے ہوئے جس

### اطلاع نوٹس غیر حاضری

آپ ایڈیٹر کنگڈم عمران نمبر 3201 ایف آر پی پشاور روڈ پشاور پولیس لائن سوئی 21/12/2018 سے بدستور غیر حاضر ہیں۔ چارج شیٹ دوسری آف انکلیشن فائل شوکار نوٹس ایٹو ہو کر آپ کے گھر کے پتے پر بذریعہ ڈی ایف سی بھیجا جا کر آپ کے بھائی کامران نے بدست خود وصول کیا ہے لیکن آپ نے ابھی تک کوئی جواب نہیں دیا اور نہ حاضری کی۔

آپ کو بذریعہ اشتہار بڑا مطلع کیا جاتا ہے کہ سات دن کے اندر اندر اپنی ماضی تحریری بیان پیش کریں ورنہ آپ کے خلاف یکطرفہ کارروائی عمل میں لائی جائے گی۔

**محکم سبیر منڈیٹ آف پولیس پشاور وینچ پشاور**

SAY NO TO CORRUPTION & DOLTA

INF(P)779 www.khyberpakhtunkhwa.gov.pk

ATTESTED

Annex - E

13

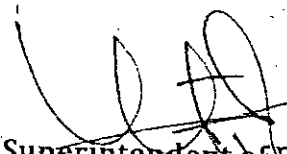
FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

I, Superintendent of Police FRP Peshawar Range Peshawar, as competent authority do hereby serve you Head Constable Imran No. 3201, of FRP/PR Peshawar.

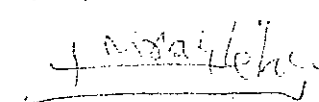
- 1) I. That consequent upon the completion of enquiry conducted against you by RI/Iltaf Hussain of FRP/PR for which you were given full opportunity of hearing. On going through the finding/recommendations of the enquiry officer the material available on record and other connected papers I am satisfied that you have committed the following acts/omissions per police rules 1975:


While posted at FRP Peshawar Range, Peshawar you remained absented from lawful duty w.e.from 21.12.2018 till to date without taking any leave/permission from the competent authority. Your this act amount to gross miss-conduct and punishable.

- 2) Therefore, I Superintendent of Police FRP/PR Peshawar as competent authority has tentatively decided to impose upon you Major/Minor penalty including dismissal from service under the said Rules.
- 3) You are, therefore, required to Show Cause as to why penalty should not be imposed upon you.
- 4) If no reply to Final Shew Cause Notice is received within the seven days of it delivered in the normal course of circumstance, it shall be presumed that you have no defense to put in and consequently ex-parte action shall be taken against you.

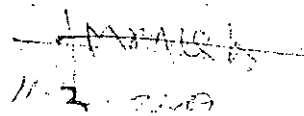
  
Superintendent of Police, FRP  
Peshawar Range, Peshawar

No. 82 /PA, dated Peshawar the 05 / 03 / 2019.



  
**ATTESTED**

173-11547352-51

  
11-2-2019



Annex - F

14

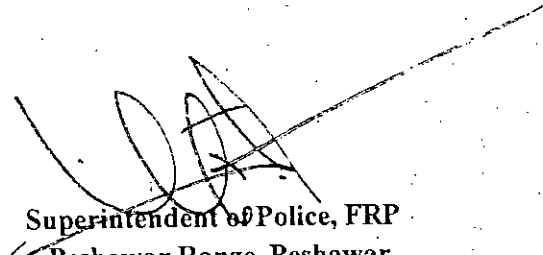
**ORDER**

This office Order relates to the disposal of formal departmental enquiry against Head Constable Imran No.3201 of FRP Peshawar Range, remained absent himself from lawful duty w.e.from 21.12.2018 till to date without taking any leave permission from competent authority.

In this connection Head Constable Imran No.3201, was charge sheeted vide this office order No.06/PA, dated 15.01.2019 and also proceed him against departmentally through RI/Iltaf Hussain of FRP/PR. Who after fulfilling necessary process submitted his findings wherein the Enquiry Officer added that his brother has received charge sheet but did not bother to submit reply. The E.O stated that the said Head Constable being as a responsible officer but his behavior is irresponsible.

Later on he was served with a Final Show Cause Notice but did not bother to submit reply. Besides, a notice was also published in Daily Newspaper, "Aaj" dated 22.02.2019 wherein the delinquent was directed to join his duty, but in vain.

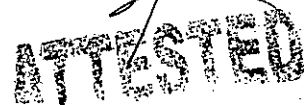
Therefore, I Tariq Sohail Marwat Superintendent of police, FRP Peshawar Range, Peshawar exercise of power vest in me under 5 (5) of Khyber Pakhtunkhwa police rules 1975 (amendment 2014) award him a Major Punishment of "Removal from Service" with immediate effect and his absence period is hereby treated as absence from duty.

  
Superintendent of Police, FRP  
Peshawar Range, Peshawar.

No. 125-27 /PA dated Peshawar Range the 03/04 /2019.

Copy to:-

1. The Accountant FRP/PR Peshawar
2. The SRC/FRP/PR Peshawar
3. The OASI/FRP/PR Peshawar

  
ATTESTED

3371

02.05.19

بخدمت جناب کمانڈنٹ صاحب FRP خیبر پختونخوا پشاور۔

جناب عالی!

عنوان: اپیل برائے بحالی نوکری۔

بحوالہ آرڈر نمبری 125-27 مورخہ 03.04.2019 مجاریہ جناب سپرنٹنڈنٹ آف پولیس ایف آر پی ریج  
معروض خدمت ہوں کہ من سائل ایف۔ آر۔ پی ریج میں ڈیوٹی سرانجام دے رہا تھا کہ میرے والد صاحب کی طبیعت اچانک خراب  
ہوئی۔ اور بیماری شدید ہونے کے باعث والد صاحب کو ہسپتال داخل کیا گیا گھر کا کوئی دوسرا ذمہ دار فرد نہیں تھا تا کہ علاج معالجہ  
اور خیال اچھی طرح رکھا جائے۔ بدیں وجہ سائل نے طویل غیر حاضری کی۔ میں مورخہ 21.12.2018 سے غیر حاضر تھا اور پھر  
21.02.2019 کو حاضری کی رپورٹ کی ہے لیکن مجھے بدستور غیر حاضر تصور کیا گیا ہے۔

بذریعہ ہمدردانہ اپیل کی جاتی ہے کہ من سائل جو کہ 2 ماہ غیر حاضر تھا اور سائل کو محکمہ سے برخواست کیا گیا ہے سائل  
ایک غریب گھرانے سے تعلق رکھتا ہے سائل نے غیر حاضری بہت مجبوری کی بناء پر کی ہے۔ سائل کو دوبارہ اپنی نوکری پر بحال کی  
جاوے۔ سائل تاحیات دعا گوہ رہے گا۔

العارض

المرقوم 02.05.2019

عمیران  
آپکا تابع فرمان EX- ہیڈ کنسٹیبل عمران نمبر 3201 متعینہ ایف۔ آر۔ پی پشاور

Sifegat

Incorporation

W. 03/5

ATTESTED

ORDER

This order will dispose of the departmental appeal preferred by ex- Head constable Imran No. 3201 of FRP Peshawar Range, against the order of SP FRP Peshawar Range, Peshawar issued vide OB No. 214, dated 03.04.2019, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he remained absented himself from lawful duty with effect from 21.12.2018 till the date of his removal from service i.e 03.04.2019 for the period of 03 months 12 days without any leave/permission of the competent authority.

In this regard, he was issued Charge Sheet and Statement of Allegations, and RI Itaf Hussain FRP Peshawar Range was appointed as Enquiry Officer to conduct proper enquiry against him. After completion of enquiry the Enquiry Officer submitted his findings, wherein, he reported that the Charge Sheet was served upon his brother namely Kamran, but the delinquent official did not bother to submit reply. The Enquiry Officer stated that the said Head constable is being found an irresponsible officer and he has no more interest in the service of police department.

Upon the findings of Enquiry Officer, he was served with Final Show Cause Notice, but he did not bother to submit reply. Besides, a notice was also published in Daily Newspaper "Aaj" dated 22.02.2019, wherein the delinquent official was directed to join his duty, but he did not turn up.

Keeping in view the recommendation of Enquiry Officer and other material available on record, therefore, he was awarded major punishment of removal from service OB No. 214, dated 03.04.2019.

Feeling aggrieved against the impugned order of SP FRP Peshawar Range, Peshawar the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 15.05.2019.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. The law helps the diligent and not indolent.

From perusal of his service record it has been found that on the allegation of absence he was awarded minor punishment of two annual increments with cumulative effect and also removed from service vide Order Endst. No. 32-34/PA, dated 10.01.2018, later on he was reinstated in service vide this office Order Endst; No. 1138/EC, dated 06.02.2018. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force. Therefore any leniency or complacency would further embolden the accused officer and impinge upon the over all discipline and conduct of the force. There doesn't seem any infirmity in the order passed by the competent authority therefore no ground exist to interfere in same.

Based on the findings narrated above, I, Sajid Ali PSP Commandant FR Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected being meritless.

Order Announced.

**ATTESTED**

Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar

No. 4398-99 /EC, dated Peshawar the 16/05/2019.

- Copy of above is forwarded for information and necessary action to the:-
1. SP FRP Peshawar Range, Peshawar. His service record alongwith D-file sent herew
  2. Ex-Head constable Imran No. 3201 S/O Feroz Khan, Police Station Gulberg, Vii Ziarat Wali Nothia Qadeem, District Peshawar.

17

10/06/2019  
3201  
PR  
EX

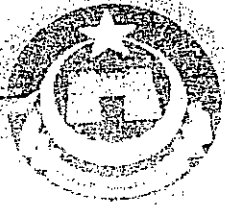
Handwritten notes in Urdu script, including the word 'KPR' and various lines of text.

17

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Part - I

17



Annex - J

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

No. SI/ 3801 /19, dated Peshawar the 29/10/2019

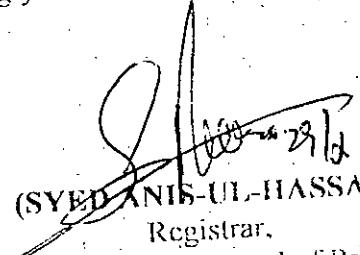
To The Commandant,  
Frontier Reserve Police,  
Khyber Pakhtunkhwa, Peshawar.

Subject: REVISION PETITION.

Memo:

The Competent Authority has examined and filed the revision petition submitted by Ex-Head Constable Imran No. 3201 of FRP Peshawar against the punishment of removal from awarded by Superintendent of Police, FRP Peshawar vide OB No. 214, dated 03.04.2019, being time barred.

The applicant may please be informed accordingly.

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

ATTESTED

**VAKALAT NAMA**

NO. \_\_\_\_\_/20

IN THE COURT OF K.P Service Tribunal, Peshawar

Imran Khan (Appellant)  
(Petitioner)  
(Plaintiff)

VERSUS

Police Deptt (Respondent)  
(Defendant)

I/We, Imran Khan

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

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

Dated 26-11/2019

Imran Khan  
(CLIENT)

ACCEPTED

M. Asif Yousafzai  
**M. ASIF YOUSAFZAI**  
Advocate Supreme Court  
Peshawar.  
B.C NO# 10-7327  
CNIC # 17301-5106574-3

**OFFICE:**

Room # FR-8, 4<sup>th</sup> Floor,  
Bilour Plaza, Peshawar,  
Cantt: Peshawar  
Cell: (0333-9103240)

Syed Noman Ali Bukhari  
Advocate  
Attested

doc = 30  
fee = 450

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 1588/2019**

**Imran Ex-Head constable No. 3201,**

FRP Peshawar Range, Peshawar.....Appellant

**VERSUS**

1. The Registrar for Inspector General of Police  
Khyber Pakhtunkhwa, Peshawar.
2. Commandant, Frontier Reserve Police,  
Khyber Pakhtunkhwa, Peshawar.
3. The Superintendent of Police, FRP,  
Peshawar Range, Peshawar..... Respondents

**PRELIMINARY OBJECTIONS**

1. That the appeal is badly time barred.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has no cause of action to file the instant appeal.
4. That the appellant has not come to this Honorable Court with clean hands.
5. That the appellant is estopped due to his own conduct to file the instant Service Appeal.
6. That the appellant trying to concealed material facts from this Honorable Tribunal.

**WRITTEN REPLY ON BEHALF OF RESPONDENTS**

**FACTS**

**RESPECTED SHEWETH:-**

1. Para No.1 is admitted to the extent that the appellant was appointed as constable as admitted by him. However, from perusal of his service record the appellant has been found a habitual absentee as his service roll is full of red entries.
2. Incorrect and denied. The appellant was remained absent from duty with effect from 21.12.2018 till the dated of his removal from service i.e 03.04.2019 for the total period of 03 months 12 days, without any leave or prior permission of the competent authority. It is pertinent to mention here that before the aforesaid absence the appellant has also remained absent from his lawful duty with effect from 07.10.2017 to 25.10.2017 & from 26.10.2017 to 21.11.2017 for a period of 45 days to which he proceeded against departmentally and removed from service vide OB No. 49, dated 11.01.2018. Later on, he submitted departmental appeal and at that time taken the plea of the illness of his father, before the appellate authority, therefore, he was reinstated in service vide Order Endst, No. 1138/EC, dated 06.02.2018, now he again taking the same plea before this Honorable Tribunal (Copy of the reinstatement order is attached herewith as annexure "A").

3. Incorrect and denied. On the allegations of willful absence the appellant was issued Charge Sheet and Enquiry Officer was nominated to conduct enquiry against him. The appellant has deliberately failed to submit his reply of Charge Sheet or appeared before the competent authority to defend himself. During the course of enquiry the appellant was summoned time and again to submit his reply or appear before the Enquiry Officer, but he failed to do so. An ample opportunity of personal hearing was also provided to the appellant by the competent authority, but he failed availed this opportunity.
4. Incorrect and denied. Upon the findings of the Enquiry Officer the appellant was issued Final Show Cause Notice, but he failed to submit his reply or appear before the competent authority, besides a notice was also published in the daily Newspaper "Ajj" dated 22.02.2019, with the directions to report arrival within seven days and submit written statement, but he did not turn up and after fulfillment the due codal formalities the appellant was removed from service.
5. Para No. 5 is admitted to the extent that departmental appeal submitted by the appellant was thoroughly examined and rejected on sound grounds. Later on he submitted review petition before the Inspector General of Police, Khyber Pakhtunkhwa, Peshawar, which was rejected and filed on the grounds of time barred.
6. The appellant has not come to this Honorable Tribunal with clean hands, therefore the instant service appeal may be dismissed on the following grounds.

**GROUND:-**

- A. Incorrect and denied. The appellant was treated in accordance to law, therefore, the orders issued by respondents are legally justified and in accordance to law and urles.
- B. Incorrect and denied. That the impugned order was correctly passed by the competent authority with immediate effect and the absence period was treated as absence from duty. The judgment of superior courts mentioned by the appellant in the Para is not applicable to the case of the appellant.
- C. Incorrect and denied. The appellant was deliberately remained absent from his lawful duty without any leave or prior permission of the competent authority. In this regard he was proceeded against departmentally vide order Endst; No. 06/PA, dated 15.01.2019. (Copy of departmental proceeding order is attached herewith as annexure "B"). Upon the finding of Enquiry Officer, the appellant was issued Final Show Cause Notice, but he failed to submit his reply before the competent authority and an ample opportunity of personal hearing has also been offered to the appellant, but he deliberately failed to avail the same opportunity. After fulfillment of all



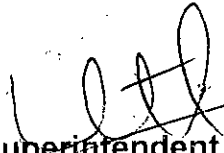
codal formalities required as per law, the appellant was removed from service under the law.

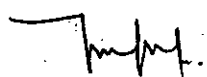
- D. Incorrect and denied. The appellant has failed to submit the reply of Charge Sheet, Show Cause Notice or appear before competent authority to produce the medical certificates mentioned by the appellant in the Para, despite the fact that he was summoned time and again and it is evident from Charge Sheet, Show Cause Notice. Subsequently, he was also noticed through Newspaper, but he deliberately failed to appear before the competent authority to defend himself. The Enquiry Officer fully established the charges leveled against him and recommended for major punishment. Therefore there is no need of denovo enquiry in the instant case.
- E. Incorrect and denied. An ample opportunity of personal hearing has already been offered to the appellant, but he deliberately failed to avail this opportunity.
- F. Incorrect and denied. Upon the finding of Enquiry Officer, the appellant was issued Show Cause Notice and serviced upon him through special messenger on his home address vide DD report No. 13, dated 11.03.2019 and his signature was obtained as a token of its receipt. (Copy of Show Cause Notice is attached as annexure "C").
- G. Incorrect and denied. All codal formalities have been fulfilled during the course of enquiry under the relevant special law and thereafter the impugned order was passed in accordance to law.
- H. Incorrect and denied. The allegations are false and baseless. Proper departmental proceedings were initiated against him under the special law i.e Police Rules 1975 amended in 2014.
- I. Incorrect and denied. The appellant was deliberately absented himself from lawful duty to which he was proceeded against departmentally to dig out the actual facts. During the course of enquiry, the appellant has failed to appear before the Enquiry Officer or before the competent authority to present any justification regarding to his prolong absence.
- J. Incorrect and denied. The appellant has also given a chance by reinstating him in service vide office Order Endst; No. 1138/EC, dated 06.02.2018, but he did not mend his way and again repeated the same practice and remained absent from lawful duty, therefore, he was not deserved to again reinstated in service. Moreover, the case of the appellant is not at par with the case of another constable mentioned in the Para.
- K. Incorrect and denied. That the charges leveled against the appellant has been fully established against him during the course of enquiry and after fulfillment the due codal formalities he was awarded the major punishment of removal from service in accordance to law.

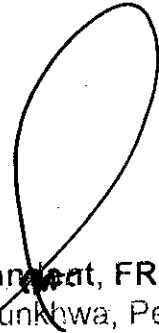
- L. Incorrect and denied. The sufficient opportunity of personal hearing in the light of natural justice has already been provided to the appellant, but he intentionally failed to avail the such opportunity.
- M. The respondents may also be permitted to create additional grounds at the time of arguments.

**PRAYERS**

It is therefore, most humbly prayed that in the light of aforesaid facts/submission the service appeal may kindly be dismissed with cost.

  
**Superintendent FRP,**  
Peshawar Range, Peshawar  
(Respondent No.3)

  
**Inspector General of Police**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No.1)

  
**Commandant, FRP,**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No.2)

ORDER

"A"

✓ This order will dispose of the departmental appeal preferred by Ex- Head constable Imran No. 3201 of FRP Peshawar Range against the order of removal from service passed by SP FRP, Peshawar Range, Peshawar vide OB No. 49, dated 11.01.2018. The applicant was proceeded against on the allegations that he absented himself from lawful duty with effect from 07.10.2017 to 25.10.2017, 26.10.2017 to 21.11.2017 for total period of 45 days without taking any leave/permission from his seniors.)

✓ (Proper departmental proceedings were initiated against him. He was issued Charge Sheet and Statement of Allegations and Reserve Inspector Mushtaq Shah of FRP PR was appointed as Enquiry Officer to conduct proper enquiry against him. The Charge Sheet served upon him, but he did not bother to submit his reply. After completion of all codal formalities the Enquiry Officer submitted his findings wherein he mentioned that the delinquent constable is a habitual absentee and his previous service record is found unsatisfactory. The Enquiry Officer recommended him for major punishment.)

✓ (Upon the findings of Enquiry Officer, the accused Head constable was issued/served with Final Show Cause Notice vide office No. 515/PA, dated 15.12.2017, but he failed to submit his reply.)

✓ (In the light of recommendation of the enquiry officer and other material available on record, he was accordingly removed from service vide office OB NO. 49, dated 11.01.2018.)

✓ (Feeling aggrieved against the impugned order of SP FRP, Peshawar Range, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 01.02.2018.)

α (During the course of personal hearing, the applicant contended that he was not remained absent from duty willfully, but due to the illness of his father and in support of which he produced the medical prescription regarding to the treatment of his father. He further stated that there is no responsible person except the applicant for the look after of his sick/aged father. He further disclosed that he belongs to a poor family and a sole bread earner for his kids and aged parents as well. His plea is found plausible and satisfactory.)

(Based on the findings narrated above, I, **Muhammad Ijaz Khan, PSP** Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, the applicant father critically ill appeared alongwith him. Due to his genuine need & family conditions, a lenient view is taken, he is hereby reinstated in service from the date of removal form service as a last warning. However, he shall not claim the back benefits of absence/intervening period.

Order Announced.)



(OB 127 / 07/02/18)

SPC (Halt) / 127  
for a lactation  
[Signature]

Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar

No. 1138 /EC, dated Peshawar the 06 /02 /2018.

Copy of above is forwarded for information and necessary action to the SP FRP, Peshawar Range, Peshawar. His service record alongwith D file sent herewith.

'B'

(7)

**ORDER OF ENQUIRY AGAINST CONSTABLE IMRAN NO.3201. CONTAINED UNDER  
SUB.RULE 4. OF RULE 5 OF NWFP (NOW KHYBER PAKHTUNKHWA) (E&D) RULES  
1975.**

It has been made to appear before me that accused Constable Imran No.3201 is prima-facie guilty of the following charges to be dealt with under General Police proceedings contained u/r 5(4) of NWFP Rules (E&D) 1975.


Constable Imran No.3201 of FRP Peshawar Range, remained absent from lawful duty w.e.from 21.12.2018 till to date without taking any leave/permission from the Competent Authority.

The act of accused official falls within the ambit of misconduct within the meaning of rules 2 (iii) rules 1975 and is liable to be proceeded with under the General police proceedings, contained in Police Rules 1975.

From the above charge, I am convinced that the said official has ceased to become efficient and it accused of gross misconduct therefore, I Superintendent of Police FRP/Peshawar Range, Peshawar being authorized officer within the meaning of 2(ii) of the said rules nominate Enquiry Officer. RI/Iltaf Hussain of FRP/PR to enquiry into the charge, levelled against him.

The enquiry officer after completing all enquiry proceedings, shall forward the verdict/Findings to the undersigned within due dated period of 10-days contained U/S 6 (5) of the rules.

Charge sheet and summary of allegations against the accused officer, are being issued separately, reply where of shall be submitted before the enquiry officer within the period of 07.days from date of receipt.

  
(Tariq Sohail Marwat)  
Superintendent of Police FRP,  
Peshawar Range, Peshawar.

No. 06 /PA dated Peshawar Range the 15/01/2019.

Copy to:-

Enquiry Officer. RI/Iltaf Hussain of FRP/PR

B/2

5

**CHARGE SHEET U/R 6(1)(A) NWFP (NOW KHYBER PAKHTUNKHWA)**  
**POLICE RULES 1975.**

You **Constable Imran No.3201** posted at FRP/Peshawar Range Peshawar is hereby charged for committing the following Omission/Commissions.

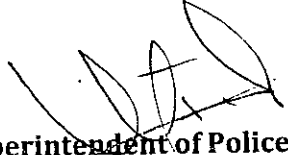
**Constable Imran No.3201** of FRP Peshawar Range, remained absent from lawful duty w.e.from 21.12.2018 till to date without taking any leave/permission from the Competent Authority.

You are hereby called upon to submit your written defence against the above charged before the enquiry officer.

Your reply should reach to the enquiry officer within (7) days from date of receipt of this charge Sheet, failing with Ex-part proceeding shall be initiated against you.

**SUMMARY/STATEMENT OF ALLEGATION**

**Constable Imran No.3201** of FRP Peshawar Range, remained absent from lawful duty w.e.from 21.12.2018 till to date without taking without any leave/permission from the Competent Authority. Your reply should reach to the enquiry officer within (7) days from date of receipt of this charge Sheet, failing with Ex-part proceeding shall be initiated against you.

  
Superintendent of Police, FRP  
Peshawar Range, Peshawar.

U/106

SLS

173019830393-1

21.1.2019

(8)

۱۔ بحالی کے حوالہ چارج شیٹ نمبر 06/PA 05/01/19 پر خلاف میں  
 لکھیں۔ عمران نے 23 دسمبر 2019 کو درخواست دی تھی۔ چارج شیٹ نمبر 05/01/19  
 اور ڈی سی میں DF 05/01/19 کو طلب کرتے چارج شیٹ نمبر 05/01/19 میں ان کی  
 حوالہ دی DF 05/01/19 نے بحالی کے حوالہ 05/01/19 پر 19 دسمبر کو لکھی تھی۔  
 تبدیل کنندہ نے والپی رپورٹ میں بیان کی کہ اس کے بجائے چارج شیٹ حوالہ  
 نمبر 05/01/19 کو طلب کی۔ چونکہ الزام علیہ نے جواب دیا اور نہ راپٹ کیا۔ اس بناء  
 پر آفیسر نے دوبارہ پلین کی کہ مقدمہ کے ڈرافٹ مذکورہ سے تبدیل کریں  
 اس نے بحالی کے حوالہ 05/01/19 کو لکھا کہ الزام علیہ نے یہی درخواست کی۔ بحالی  
 پر 19 دسمبر 05/01/19 کے حوالہ 05/01/19 پر 19 دسمبر کو لکھی تھی۔  
 حوالہ 05/01/19 میں یوں بیان کیا کہ جسٹس نے عمران کے حوالہ میں عدم وجود یا اس  
 کے بجائے کسی کا حوالہ کو چارج شیٹ حوالہ کی یہ امر قابل ذکر ہے کہ  
 HC مذکورہ ڈیمنڈ فرم کرنے کی صورت میں غیر ضروری وارنٹس نہیں دیے گئے۔  
 جبکہ دائرہ طور تبدیل کنندہ سے یہ فیصلہ کیا گیا ہے۔ اس لئے HC مذکورہ کے  
 چارج شیٹ بند فرم 05/01/19 میں مضامین کی رپورٹ لکھی گئی ہے۔  
 ہے۔ حذیر علیہ حذران بالہ افضل ہے۔

محمد سعید خان (عملہ کاغذات ہمراہ دفعہ رپورٹ ہے)

RESERVE INSPECTOR  
 FRP  
 12/01/19

" C "

**FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.**

I, Superintendent of Police FRP Peshawar Range Peshawar, as competent authority do hereby serve you Head Constable Imran No. 3201, of FRP/PR Peshawar.

- 1) I. That consequent upon the completion of enquiry conducted against you by RI/Iltaf Hussain of FRP/PR for which you were given full opportunity of hearing. On going through the finding/recommendations of the enquiry officer the material available on record and other connected papers I am satisfied that you have committed the following acts/omissions per police rules 1975.

While posted at FRP Peshawar Range, Peshawar you remained absented from lawful duty w.e.from 21.12.2018 till to date without taking any leave/permission from the competent authority. Your this act amount to gross miss-conduct and punishable.

- 2) Therefore, I Superintendent of Police FRP/PR Peshawar as competent authority has tentatively decided to impose upon you Major/Minor penalty including dismissal from service under the said Rules.
- 3) You are, therefore, required to Show Cause as to why penalty should not be imposed upon you.
- 4) If no reply to Final Show Cause Notice is received within the seven days of it delivered in the normal course of circumstance, it shall be presumed that you have no defense to put in and consequently ex-parte action shall be taken against you.

  
Superintendent of Police, FRP  
Peshawar Range, Peshawar

No. 82 /PA, dated Peshawar the 05 /03/2019.

Imran

173011547350-51

Imran  
11-3-2019

دفتري لپرا نقلہ 05 دفتري 10<sup>03</sup>/<sub>19</sub>

د 05 دفتري DFc ذابو خان لپرا وقتا 10:00 اس وقت دفتري 10-03-19

DFc نسيب خات وكي 3024 كو نسيب نسيب فائلك  
نسيب بناؤ هيٺ نسيب عمران 3201 نسيب نسيب قديم  
اجانٽي جماعت پيشاور روانه كرتي والهي متعلق  
هدايت مناسب هوندي -

مناب عالي!  
نقل مطابق اصل مع  
ع

نقلہ 13 دفتري 11<sup>03</sup>/<sub>19</sub>

د 13 والهي DFc ذابو خان لپرا وقتا 13:20 اس وقت دفتري 11-03-19

DFc نسيب خات وكي 3024 روانه نسيب دفتري جو الہ وكي  
دفتري 10<sup>03</sup>/<sub>19</sub> والهي نسيب او بيان ليا۔ م فر كورہ  
فائلك نسيب نسيب نسيب نسيب نسيب نسيب نسيب  
دفتري اور نسيب نسيب نسيب نسيب نسيب نسيب  
نسيب نسيب والهي دفتري نسيب نسيب

مناب عالي!  
نقل مطابق اصل مع  
MMPD  
11-03-2019





# DEPARTMENT OF PATHOLOGY

Medical Teaching Institution,  
Khyber Teaching Hospital, Peshawar.



Hospital No: 2168160717	Patient Name: FAIROOZ	Bed No:	Age: 45 YEARS
Referred By: MEDICAL D	Result Date: 07-July-2017	Lab No: 496070717	Sex: MALE

## Electrolytes

PARAMETERS	RESULT	UNIT	REFERENCE RANGE
Electrolyte			
Na+	135.1	mmol/l	135---150
K+	3.91	mmol/l	3.5---5.1
Cl-	114.7	mmol/l	98---108

Lab Technician

Pathologist

**Dr. Muhammad Asghar**  
Director Pathology  
Assistant Professor Microbiology

**Mr. Noor Rehaman**  
Microbiologist / Administrator

**Dr. Safia Rahman**  
Assistant Professor Chemical Pathology

**Mr. Sana Ullah**  
Clinical Technologist

**Dr. Naveed Sharif**  
Assistant Professor Histopathology

**Mr. Muhammd Riaz Khattak**  
Clinical Technologist

**Dr. Neelam Ahmad**  
Consultant Hematologist

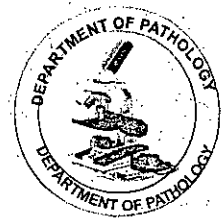
**Mr. Habib Ullah Khan**  
Biotechnologist  
Incharge PCR Lab

E-mail: [pathologykth@gmail.com](mailto:pathologykth@gmail.com) Web Site: [www.kth.gov.pk](http://www.kth.gov.pk) Phone#091-9224400-7 Ext: 2047



# DEPARTMENT OF PATHOLOGY

Medical Teaching Institution,  
Khyber Teaching Hospital, Peshawar.



Pathologist

Lab Technician

Second

28

Control

Second

29

Patient

A.P.T.T

1.01

INR

Second

13

Control

Second

15

Patient

PT

REFERENCE RANGE

UNIT

RESULT

PARAMETERS

PT/A.P.T.T

Referred By: MEDICAL C	Result Date: 06-July-2017	Lab No: 612060717	Sex: MALE
Hospital No: 2165610717	Patient Name: DILJAN	Bed No:	Age: 55 YEARS

**Dr. Muhammad Asghar**  
Director Pathology  
Assistant Professor Microbiology

**Dr. Safia Rahman**  
Assistant Professor Chemical Pathology

**Dr. Naveed Sharif**  
Assistant Professor Histopathology

**Dr. Neelam Ahmad**  
Consultant Hematologist

**Mr. Noor Rehman**  
Microbiologist / Administrator

**Mr. Sana Ullah**  
Clinical Technologist

**Mr. Muhammad Riaz Khattak**  
Clinical Technologist

**Mr. Habib Ullah Khan**  
Biotechnologist  
Incharge PCR Lab

E-mail: pathologykh@gmail.com Web Site: www.kth.gov.pk Phone: #091-9224400-75412047

Accident & Emergency Services Deptt:  
(MTI) Khyber Teaching Hospital, Peshawar



Invoice #K03170469385

P.L.R. No K0300000465244

Operator FAWAD JAN

1792870

50 Years

Male

24-JUL-17

REGULAR

FIRDOZ

10:30:32

CASUALTY

R  
Y  
G

Please sign anyone

C/c

*Raw*  
*[Handwritten signature]*

S.No: 15601

B.A 14090

RBS46

Investigations

*7th Domiciliary Patient RBS*  
*M.R.BOP 78*  
*78*  
*78*  
*78*

Diagnosis

*78*  
*78*  
*78*

Referred to

*W/O [Name]*  
*78*  
*78*

Doctor on duty stamp

*[Handwritten signature]*

**Dr. Imtiaz Khan**

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

**CHILDREN SPECIALIST**

Registrar Children Ward  
Kwait Teaching Hospital  
Abdara Chowk Peshawar.  
PMDC #: 12076-N  
HCC Reg #: 04634

Not Valid For Court

**ڈاکٹر امتیاز خان**

ایم، بی، بی، ایس۔ ایم، سی، پی، ایس۔ پی، جی پی این

**بچوں کی اسپیشلسٹ**

رجسٹرار چلڈرن وارڈ  
کوئٹہ ٹیچنگ ہسپتال ابدرا چوک پشاور

Pt's Name: Ferooz Ullah Age - ۳۶ Sex ♂ Wt -  Date 1/7/17

Clinical Record

*Rec*

Fever  
GABA.  
Amoxicillin  
Gaultheria  
Bp 140/70

Tab. Ifflor 500p  
r 7)  
Tab ED3 Plo stud.  
CAP ESSO 40p  
r 14)  
Tab Surber Z.  
r 10)  
cap Pst 20p  
r 10)  
Ensure MMH

اوقات کار:  
موسم گرما: شام 5 بجے سے رات 9 بجے تک  
موسم سردی: سہ پہر 4 بجے سے رات 9 بجے تک

Adv  
mp.

13

چھٹی بروز اتوار

0348-9254838

پتہ: آصف کلینکل لیبارٹری پلوسی چوک پشاور

TREATMENT AT HOSPITAL

ہسپتال کیلئے علاج

Tab. Doanil 5mg x OD  
 Cap. Esso 40mg x OD  
 Inf. N/S 500ml IV x stat  
 Dig. Sulzone 2gm IV x B.D  
 Dig. Gravinate IV x TDS.  
 Dig. Humilin 70/30  
 30 u morning  
 16 u evening  
 Dig. Methyl cobal IV x OD  
 Cap. Neo Gab 100mg x B.D

NEXT APPOINTMENT:

اس کی تالیف کی مدت سے  
 ۷ بارہ تشریح رائیں

CONDITIONS ON DISCHARGE:

Stable

Senior Registrar



MRI#  
16675

DISCHARGE CARD

Hospital No.

1871

Department of Medicine

Consultant Prof. Dr. Muhammad Subhan

Patient Name Feroz Khan

Age 64 Sex M Ward Private Room 5 Bed 5

Address Peshawan

Guardian -

Diagnosis known diabetic &

hypertensive & uncontrolled

Diabetes &

Date of Admission 11/3/2017 Complication -

Date of Discharge 15/3/2017

Discharging Slip Prepared by Dr. Gulzar

Kuwait Teaching Hospital

Abdara Chowk University Road Peshawar. Ph: 091-5853486

**CONDITION ON ADMISSION**

**C/C:**

Vomiting  
fever

**GPE:**

VITALS: 118 PULSE: BP: 140/90 TEMP 99.5 R/R  
Anemia: - Jaundice: - Cyanosis: - Dermida: -  
L. Nodes: - JVP: - Thyroid: -

**SYSTEMIC EXAM:**

CVS S1+S2 +0

RS B/L clear

GIT Soft, nontender ± no

CNS GCS = 15/15

visceromegaly

**INVESTIGATIONS**

**CBC:**

Hb: 11.6 g/dL TLC: 20800/<sub>4mm</sub> P. Count: 218000/<sub>4mm</sub>  
N: - L: - M: - E: -

**Peripheral Smear:**

**Retic Count:**

**Bone Marrow:**

**URINE ANALYSIS:**

pH acidic

Alb: NI Sugar: NI SBC: -

Rbc: 1-2 Casts: - Pus Cell 3-5/HPP

**RBS:** 51 mg/dL

S. Electrolytes: -

Na: 129 mg/L K: 5.3 mg/L Cl: 145 mg/L

**RFTs:**

Blood Urea: 69 mg/dL Serum Creatinine: 1.5 mg/dL

**LFTs:**

SGPT: 260/L Bilirubine: 0.5 mg/dL

ALK Phos: 260/L

HBS Ag: - PCR: -

Hbe Ag: -

Anti HCV: - PCR: -

**TREATMENT AT HOME**

گھر کیلئے علاج

Cap. Esso 400mg 60

141

Tab. Azithromycin 1gm 60

Tab. Paracetamol 60

Tab. Omeprazole 60

Tab. Methy Labal 60

Syp. Mollinum 2+2+2 270F 60

Cap. Neo395 1000mg 60



# Asif Clinical Laboratory

NEAR AGRICULTURE UNIVERSITY PESHAWAR

Name  
Lab #

Fairooz Khan

REF BY Dr. Imtiaz Khan

Age  
Time

Yrs

Sex

M

Date

1-Jul-17

## FINAL REPORT

TEST REQ: Malaria (By ICT)  
TEST

RESULT

MP: Malaria (PF)  
Malaria (PV)

Negative (By ICT)  
Negative (By ICT)

چھٹی بروز اتوار

0348-9254838

اسف کلینیکل لیبارٹری پلوسٹی چوک پشاور

Rs. 10

Accident & Emergency Services Deptt:  
(MTI) Khyber Teaching Hospital, Peshawar



Invoice #K03170438803

M.R. No. K0300000435215

Operator AKHTAR HUSSAIN

1762109

45 Years

Male

FIROZ

08:58:36

16-JUL-17

REGULAR

R  
Y  
G  
Please sign name

CASUALTY

S.No. 2025

C/c

Rec

BP 150/90

DRUG 37  
RB S, (37)

I.V line

Investigations

5 Hypertonic Gl

D/W diff color

M of

Med. Op

3-100 Revitalin

Diagnosis

(M)

0.5 / 1

~~Hypertonic  
Dextrose~~

3 Sympresorix forte  
(1+1)

Referred to

Blood sugar  
monitoring

0.5 / 1  
2

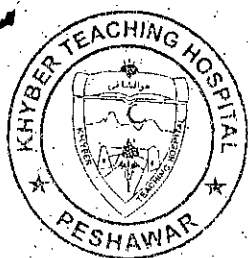
Doctor on duty stamp



# KHYBER TEACHING HOSPITAL (MTI) PESHAWAR

## LABORATORY REQUEST FORM

### Pathology Laboratory



Name: ..... Date: .....

Age: ..... Sex: ..... Ward/OPD: ..... Bed No: .....

Haematology	Serology /Microbiology	Biochemistry.
<input type="checkbox"/> Peripheral Smear	<input type="checkbox"/> HIV AB by ICT	<input type="checkbox"/> Total Protein
<input type="checkbox"/> CBC / FBC	<input type="checkbox"/> HCV Ag by ICT	<input type="checkbox"/> Albumin
<input type="checkbox"/> ESR	<input type="checkbox"/> Hbs Ab by ICT	<input type="checkbox"/> Globulin
<input type="checkbox"/> MP	<input type="checkbox"/> Hbs Ag Elisa	<input type="checkbox"/> A/G Ratio
<input type="checkbox"/> Retic Count	<input type="checkbox"/> HCV Ab Elisa	<input type="checkbox"/> Bilirubin Total
<input type="checkbox"/> G 6 P D	<input type="checkbox"/> Widal	<input type="checkbox"/> Bilirubin Direct
<input type="checkbox"/> Bone Marrow	<input type="checkbox"/> Typhidot	<input type="checkbox"/> Bilirubin Indirect
<input type="checkbox"/> Trepine	<input type="checkbox"/> ASO	<input type="checkbox"/> ALT ( SGPT)
<input type="checkbox"/> PT / INR	<input type="checkbox"/> RA-Factor.	<input type="checkbox"/> AST (SGOT)
<input type="checkbox"/> APTT	<input type="checkbox"/> AN Factor	<input type="checkbox"/> ALK Phosphates
<input type="checkbox"/> Clotting Time.	<input type="checkbox"/> Brucella	<input type="checkbox"/> Phosphates
<input type="checkbox"/> Bleeding Time.	<input type="checkbox"/> CRP	<input type="checkbox"/> Fasting Sugar
<input type="checkbox"/> Coombs Test	<input type="checkbox"/> H: Pylori.	<input type="checkbox"/> Radom Sugar
<b>HORMONES</b>	<input type="checkbox"/> Montox	<input type="checkbox"/> Urea
<input type="checkbox"/> Thyroid Function Test	<input type="checkbox"/> Scrapping for Fungus.	
	<input type="checkbox"/> Urine C/S	

Invoice No: 377090717

Amt: 50

50

Patient Name: FAIROOZ

CNIC:

ADDRESS:

CONTACT:

Patient's No: 2169160717

Source: NONE

Test Date: 09-JUL-17

Time: 15:26:47

Age: 45 YEARS

Gender: MALE

Ref By: MEDICAL D

Request(s): RBS (Random Blood Sugar) (50) (CHARGED)

377090717

لیپوڈی پروپرت کیلے ڈی گلف ہدیشہ پرفیوٹا میں

CUT HERE

LABORATORY Copy

Invoice No: 377090717

50

Patient Name: FAIROOZ

Ref By: MEDICAL D

Request(s): RBS (Random Blood Sugar) (50) (CHARGED)

377090717

**Patient Copy**

Admitted Patient

Invoice No: **527070717**

Amt: **0**

Patient Name: **FAIROOZ**

CNIC:

ADDRESS:

CONTACT:

Patient's No: 2168160717

Source: WARD

Test Date: 07 JUL 17

Time: 10:53:20

Age: 45 YEARS

Gender: MALE

Ref By: MEDICAL D

Request(s): RBS (Random Blood Sugar) (0) (CHARGED), Renal Profile (0) (CHARGED)

\*527070717\*

لیبارٹری رپورٹ ایسے ڈھائی گھنٹے بعد تیار کیا گیا ہے۔

**CUT HERE**

**LABORATORY Copy**

Invoice No: **527070717**

0

Patient Name: **FAIROOZ**

Ref By: MEDICAL D

Request(s): RBS (Random Blood Sugar) (0) (CHARGED), Renal Profile (0) (CHARGED)

\*527070717\*

**Patient Copy**

10/10/95

10/10/95

10/10/95

10/10/95

10/10/95

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10

10/10/95

**RADIOLOGY COPY**

10/10/95

10/10/95

10/10/95

10/10/95

Khyber Teaching Hospital, Peshawar

Operator: SAJID MEHMOOD

MORNING

**CARDIOLOGY Copy**

CARDIOLOGY

Invoice No: **80** amount: **100**

Patient Name: FAIROOZ

CNIC:

ADDRESS:

CONTACT:

Patient's No: 2168160717

Source: WARD

Test Date: 08-JUL-17

Time: 11:06:05

Age: 45 YEARS

Gender: MALE

Ref By: MEDICAL D

Request(s): ECG (100) (CHARGED)

\*2168160717\*

Operator: Khyber Teaching Hospital, Peshawar  
KALIM ZAHIR MORNING

Patient Copy

Admitted Patient

Invoice No: 496070717

Amt: 150

Patient Name: FAIROOZ

CNIC:

ADDRESS:

CONTACT:

Patient's No: 2168160717

Source: NONE

Test Date: 02-JUL-17

Time: 10:46:58

Age: 45 YEARS

Gender: MALE

Ref By: MEDICAL D.

Request(s): Electrolytes (150) (CHARGED).

496070717

ایمپارٹی رپورٹ کنیاء و سانی گھنٹہ بعد تشریف لائیں۔

CUT HERE

LABORATORY Copy

Invoice No: 496070717

150

Patient Name: FAIROOZ

Ref By: MEDICAL D.

Request(s): Electrolytes (150) (CHARGED).

496070717

OUT DOOR PATIENT TICKET

Sent To: \_\_\_\_\_

District: 4/2/20

CRP No: MS

Facility Name: \_\_\_\_\_

Name: \_\_\_\_\_ Age: \_\_\_\_\_ Sex: \_\_\_\_\_

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

Monthly OPD Serial No. 6318-B

Provisional Diagnosis: \_\_\_\_\_

Date	Clinical Findings / Investigations/ Treatment / Referred / Test Findings
27/9/18	<p>(LH) Rt wrist pain &amp; early morning stiffness                      refused for investigations</p> <p>Rx:-                      Tab: Voltarol 50mg (1+)                      Artizel - today                      sup - no</p>



# Khyber Teaching Hospital, Peshawar OUT - PATIENTS DEPARTMENT

RS-10/E



S.No: 73178

As:

(Lt) Hand Range of motion  
Limited (stiff wrist)  
Supination Limited

Rx given

- ⇒ Hot pack on (Lt) Hand
- ⇒ Soft tissue mobilization
- ⇒ Gentle sustained stretching Ex's
- ⇒ Gentle ROM Ex's

3/1/17

*[Signature]*  
3/1/2017



TREATMENT AT HOSPITAL

ہسپتال کیلئے علاج

Tab. Doxyl 5mg x 10  
 Cap. Esso 40mg x 10  
 Sol. N/S 500mg IV x 10  
 Sol. Sulzame 2gr IV x 10  
 Sol. Epaurate IV x 10  
 Sol. Humulin 20/30  
 30 U/1000  
 15 U/500  
 Sol. Metilgl. isobal IV x 10  
 Cap. Neo-gato 100mg x 10

Humulin 20/30  
 30 U/1000  
 15 U/500

CONDITION ON ADMISSION:

C/C:

Nonitting  
 fever

GPE:

VITALS: RR 18 PULSE: BP: 140/80 TEMP 99.7 F/R  
 Anemia: Jaundice: Cyanosis: Dermida:  
 L. Nodes: JVP: Thyroid:

SYSTEMIC EXAM:

CVS S1 + S2 + D  
 RS B/L clear  
 GIT Soft, nontender E no  
 CNS BCS = 15/15 viscer



11875

DISCHARGE CARD

Hospital No.

11875

Department of Medicine

Consultant Prof. Dr. Muhammad Seebkhan

Patient Name Feroz Khan

Age 64 Sex M Ward Private Room 5 Bed 5

Address Peshawar

Guardian

Diagnosis Chronic diabetic &

Hypertension & HTN Controlled

Diabetes

Date of Admission 11/3/2017

Complete

Date of Discharge 15/3/2017

Discharging Slip Prepared by Dr. Gulizami

Kuwait Teaching Hospital

Abdara Chowk University Road Peshawar. Ph: 091-5853486

TREATMENT AT HOME

گھر کیلئے علاج

Cap. Feroz Khan 100

100 mg

Tab. Metformin 1000 1000

Tab. Furosemide

40 mg

Tab. Metformin 1000 1000

1000 mg

Tab. Metformin 1000 1000

1000 mg

Cap. Metformin 1000 1000

1000 mg

Cap. Metformin 1000 1000

KHYBER TEACHING HOSPITAL, PESHAWAR

INVESTIGATION REQUEST FORM

Name: Ferooz Age \_\_\_\_\_ Sex \_\_\_\_\_  
Ward: RRB Bed No: 72 Consultant \_\_\_\_\_

Clinical Features:

Investigation Required:

RBS

231

Dated 07/07/2017

Registrar/M.O.

Pathologist

# KHYBER TEACHING HOSPITAL, PESHAWAR

## INVESTIGATION REQUEST FORM

Name Feroz Age \_\_\_\_\_ Sex M

Ward PRB/72 Bed No \_\_\_\_\_ Consultant \_\_\_\_\_

### Clinical Features:

RB-5-74

### Investigation Required:

Dated 9-7-17

  
Registrar/M.O.

Pathologist

KHYBER TEACHING HOSPITAL, PESHAWAR

INVESTIGATION REQUEST FORM

Name Feroz Age \_\_\_\_\_ Sex F

Ward PRB/72 Bed No \_\_\_\_\_ Consultant \_\_\_\_\_

Clinical Features:

FBS - 65  
by glucometer.

Investigation Required:

Dated 10-7-17

Registrar/M.O.

Pathologist

# KHYBER TEACHING HOSPITAL, PESHAWAR

## INVESTIGATION REQUEST FORM

Name Ferooz Age \_\_\_\_\_ Sex \_\_\_\_\_

Ward RRB Bed No 72 Consultant \_\_\_\_\_

Clinical Features:

Investigation Required:

FBS

120



Registrar/M.O.

Dated 09/07/2017

Pathologist

PH 7.339

P<sub>CO2</sub> 26.2 units

P<sub>O2</sub> 96 units

T<sub>CO2</sub> 14.9 mmol/L

HCO<sub>3</sub> 14.1 mmol/L

BE<sub>B</sub> -10.1 mmol/L

BE<sub>ef</sub> -11.9 mmol/L

SBE 18.1 mmol/L

% S<sub>O2c</sub> 97.2%

O<sub>2ct</sub> 14.9 ml/L

A-a<sub>DO2</sub> 13 units

RI 0.14

---

# KHYBER TEACHING HOSPITAL, PESHAWAR

## INVESTIGATION REQUEST FORM

Name Fecoz Age ..... Sex .....

Ward MCW Bed No 89 Consultant .....

Clinical Features:

PHL 7.409

PCOL 27.1

PO<sub>2</sub> 96

TCOL 18.6

Investigation Required:

ALCO<sub>3</sub> 17.1

BEB<sub>2</sub> -6.1

SBC 20.2

V. S<sub>2</sub> 97.7

ABG

Dated .....

07/06/2017

10:40am

Registrar/M.O.

Pathologist



1730924

**KHYBER TEACHING HOSPITAL, PESHAWAR**

**INVESTIGATION REQUEST FORM**

Name Feroz Age \_\_\_\_\_ Sex M

Ward MDW Bed No 39 Consultant \_\_\_\_\_

Clinical Features:

7:00 pm

Investigation Required:



ABG IS

PH 7.403

PCO<sub>2</sub> 27.4

PO<sub>2</sub> 100

TCO<sub>2</sub> 17.9

HCO<sub>3</sub> 17.1

%SO<sub>2</sub> 97.9%

Dated 6/7/17

[Signature]  
Registrar/M.O.

Medical ICU

Pathologist

1730924

KHYBER TEACHING HOSPITAL, PESHAWAR

INVESTIGATION REQUEST FORM

Name: Feroz Age: \_\_\_\_\_ Sex: \_\_\_\_\_

Ward: MDW. Bed No: 39 Consultant: \_\_\_\_\_

Clinical Features:

Investigation Required:

urine for ketones

Dated: 6/7/19

Registrar/M.O.

## TMO's SUMMARY

65 yrs old male  
H/o of 72 DM presented to us with the complaints of Polydipsia & polyuria and uncontrolled DM and vomiting, and burning micturition. He was managed as a case of uncontrolled DM and UTI as urinal R/E showed Numerous pus cells. After his symptoms subsided, he was discharged. Will stay stable with no H/O at time of discharge.

**VALTEC**  
(Valsartan)  
40 / 80 & 160 Tablets

**CO-VALTEC**  
(Valsartan + HCTZ)  
80 / 12.5, 160 / 12.5 & 160 / 25mg Tablets

## TREATMENT AT HOSPITAL

ہسپتال میں علاج

inj. Su/2 over 2g 1/2  
inj. N/Saline  
inj. Gravinate  
7 tabs. Diflucan 100mg  
inj. Neurobion  
Naktalan oral g  
glycine supps  
inj. oxyd

**RAST**  
(Rosuvastatin Calcium)  
5 / 10 / 20mg Tablets

Patient Copy

Invoice No: 1008060717 Amt: 1000

Patient Name: FAIROOZ  
CNIC:  
ADDRESS:  
CONTACT:

Patient: CASUALTY  
Date: 06-JUL-17  
Time: 12:17:51  
Age: 45 YEARS  
Gender: MALE  
Ref By: CASUALTY

Request(s): HBA1C (400) (CHARGED), Complete Blood Count + Platelet (100) (CHARGED), RBS (Random Blood Sugar) (50) (CHARGED), Renal Profile (100) (CHARGED), LFTs (150) (CHARGED), Electrolytes (150) (CHARGED), Urine R/E (50) (CHARGED)



کاپی بیمار

CUT HERE

LABORATORY Copy

Invoice No: 1008060717 1000

Patient Name: FAIROOZ  
Ref By: CASUALTY

Request(s): HBA1C (400) (CHARGED), Complete Blood Count + Platelet (100) (CHARGED), RBS (Random Blood Sugar) (50) (CHARGED), Renal Profile (100) (CHARGED), LFTs (150) (CHARGED), Electrolytes (150) (CHARGED), Urine R/E (50) (CHARGED)



Family Physician

**Dr. Riaz Shahid**

M.B.B.S (Pesh)

Short Courses B.M.J (UK)

R.M.P

Medical Officer Medical Unit

Govt. City Hospital, Kohat Road,  
Peshawar.



فیمیلی فزیشن

ڈاکٹر ریاض شاہد

ایم بی بی ایس (پشاور)

شارٹ کورسز، بی ایم جے (یو کے) آرا ایم پی

میڈیکل آفیسر، میڈیکل یونٹ

گورنمنٹ سٹی ہسپتال کوہاٹ روڈ پشاور

Name FER 02

Age 70

Sex ♂

Date 10-11-17

Dm 2

HTN.

haematuria.

140/90 mmHg.

1/3 ABD/DORSAL

RIB R12

14

1: Cap. TRANSAAMIN 250

(W5) 1+1+1

2: TAB. AMCLAN 625

(W6) 1+1+1

3: TAB. VOMILUX

(W3) (2+2+2)

10/11/17

Contact No: 0300-8582322

کلینک: بسکین آباد چوک ارباب سیف اللہ خان پلازہ مین روڈ ٹوٹھیہ جدید پشاور

16/10/17

16/10/17

① For. Methylene blue  
② L.H.

③ For. Methylene blue  
④ L.H.

⑤ For. Nioms  
⑥ L.H.

⑦ Conf. Riser  
⑧ L.H.

16/10/17



1730924 - 218816077

# KHYBER TEACHING HOSPITAL, PESHAWAR

## INVESTIGATION REQUEST FORM

Name Faizan Age 60y Sex Male

Ward PR-B Bed No 72 Consultant

Clinical Features: Known DM2, HTN,  
Admitted with hyperglycemia  
UTI + Developed RFE  
+ RUQ + lower right chest  
tenderness

### Investigation Required:

O/S Abdomen & urine  
Especially look for RFE +  
lower chest + Renal (must)

Dated 8/7/17

DR. SYED  
REGISTRAR/M.C.  
KTH PESHAWAR

Pathologist

Khyber Teaching Hospital, Peshawar

OUT - PATIENTS DEPARTMENT

Rs: 10/-



U4

S.No: 72402

COP

FRU

3/1/10

13/1/10

Feroz

S. S. Y

Hof - 3 weeks.

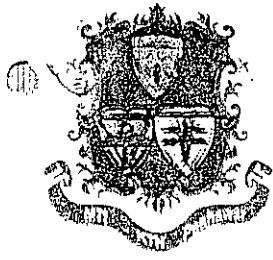
Pain in (L) hand

Pain in (L) leg

Rom - limited

Rx Refer to Physiotherapy





# DEPARTMENT OF PATHOLOGY

Medical Teaching Institution,  
Khyber Teaching Hospital, Peshawar.



Hospital No: 1730924

Patient Name: FAIROOZ

Bed No:

Referred To: CASUALTY

Result Date: 06-July-2017

Lab No: 1008060717

### LFTs

LFTs	Value	Unit	Reference Range
S. Billirubin	0.37	mg/dl	0.1----1.5
S. Alk. Phosphates	306	U/L	Ch: upto 625 Ad: upto 275
SGPT (ALT)	12.0	U/L	10----40

### Renal Profile

RFTs	Value	Unit	Reference Range
Urea	156.6	mg/dl	15----40
S. Creatinine	2.72	mg/dl	1.10----1.50

### RBS (Random Blood Sugar)

RBS	Value	Unit	Reference Range
BLOOD SUGAR (R)	445.2	mg/dl	70----140

### urine R/E

Chemical Examination	Value	Unit	Reference Range
Sugar	++	NIL	NIL
Albumin	TRACE	NIL	NIL

### Microscopic Examination

**Dr. Muhammad Asghar**  
Director Pathology  
Assistant Professor Microbiology

**Dr. Safia Rahman**  
Assistant Professor Chemical Pathology

**Dr. Naveed Sharif**  
Assistant Professor Histopathology

**Dr. Neelam Ahmad**  
Consultant Hematologist

**Mr. Noor Rehman**  
Microbiologist / Administrator

**Mr. Sana Ullah**  
Clinical Technologist

**Mr. Muhammd Riaz Khattak**  
Clinical Technologist

**Mr. Habib Ullah Khan**  
Biotechnologist  
Incharge PCR Lab

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E-mail: pathology/kth@gmail.com Web Site: www.kth.gov.pk Phone: 091-9224400-7 Ext: 211



# DEPARTMENT OF PATHOLOGY

Medical Teaching Institution,  
Khyber Teaching Hospital, Peshawar.



Hospital No: 2168160717      Patient Name: FAIROOZ      Bed No:      Age: 45 YEARS  
 Referred By: MEDICAL D      Result Date: 06-July-2017      Lab No: 1551060717      Sex: MALE

## Electrolytes

PARAMETERS	RESULT	UNIT	REFERENCE RANGE
Electrolyte			
Na+	128.2	mmol/l	135
K+	4.13	mmol/l	3.5-5.1
Cl-	105.9	mmol/l	98-108

Pathologist

Lab Technician

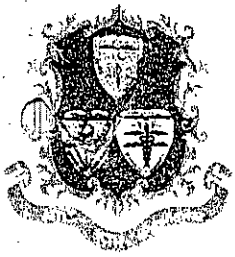
**Dr. Muhammad Asghar**  
 Director Pathology  
 Assistant Professor Microbiology  
**Mr. Noor Rehaman**  
 Microbiologist / Administrator

**Dr. Safia Rahman**  
 Assistant Professor Chemical Pathology  
**Mr. Sana Ullah**  
 Clinical Technologist

**Dr. Naveed Sharif**  
 Assistant Professor Hematology  
**Mr. Muhammd Riaz Khattak**  
 Clinical Technologist

**Dr. Neelam Ahmad**  
 Consultant Hematologist  
**Mr. Habib Ullah Khan**  
 Biotechnologist  
 Incharge PCR Lab

E-mail: pathologykth@gmail.com      Web Site: www.kth.gov.pk      Phone: 091-922-400-7      Ext: 2047



# DEPARTMENT OF PATHOLOGY

Medical Teaching Institution,  
Khyber Teaching Hospital, Peshawar.



Hospital No: 2168160717	Patient Name: FAIROOZ	Bed No:	Age: 45 YEARS
Referred By: MEDICAL D	Result Date: 07-July-2017	Lab No: 496070717	Sex: MALE

## Electrolytes

PARAMETERS	RESULT	UNIT	REFERENCE RANGE
Sodium	135.1	mmol/l	135---150
Potassium	3.91	mmol/l	3.5----5.1
Chloride	114.7	mmol/l	98-----108

Lab Technician

Pathologist

**Dr. Muhammad Asghar**  
Director Pathology  
Assistant Professor Microbiology

**Dr. Safia Rahman**  
Assistant Professor Chemical Pathology

**Dr. Naveed Sharif**  
Assistant Professor Histopathology

**Dr. Neelam Ahmad**  
Consultant Hematologist

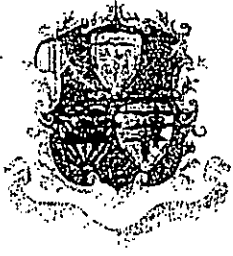
**Mr. Noor Rehaman**  
Microbiologist / Administrator

**Mr. Sana Ullah**  
Clinical Technologist

**Mr. Muhammd Riaz Khattak**  
Clinical Technologist

**Mr. Habib Ullah Khan**  
Biotechnologist  
Incharge PCR Lab

E-mail: [patology@kgh.gov.pk](mailto:patology@kgh.gov.pk) Web Site: [www.kgh.gov.pk](http://www.kgh.gov.pk) Phone: 931-9272-4007 FAX: 2017



**DEPARTMENT OF PATHOLOGY**  
 Medical Teaching Institution,  
 Khyber Teaching Hospital, Peshawar.



Hospital No: 2168160717	Patient Name: FAIROOZ	Bed No:
Referred To: MEDICAL D	Result Date: 08-July-2017	Lab No: 483080717

	10100	/cmm	4000----11000
<b>Differential Leucocyte Count</b>			
Neutrophils	84	%	40----75
Lymphocytes	12	%	20----40
Monocytes	01	%	06---10
Eosinophils	03	%	01----06

**Dr. Muhammad Asghar**  
 Director Pathology  
 Assistant Professor Microbiology

**Dr. Safia Rahman**  
 Assistant Professor Chemical Pathology

**Dr. Naveed Sharif**  
 Assistant Professor Histopathology

**Dr. Neelam Ahmad**  
 Consultant Hematologist

**Mr. Noor Rehaman**  
 Microbiologist / Administrator

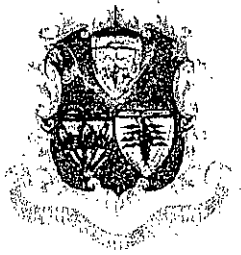
**Mr. Sana Ullah**  
 Clinical Technologist

**Mr. Muhammd Riaz Khattak**  
 Clinical Technologist

**Mr. Habib Ullah Khan**  
 Biotechnologist  
 Incharge PCR Lab

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E-mail: pathologykth@gmail.com Web Site://www.kth.gov.pk Phone#091-9224400-7 Ext:20-7



**DEPARTMENT OF PATHOLOGY**  
 Medical Teaching Institution,  
 Khyber Teaching Hospital, Peshawar.



Hospital No: 2168160717	Patient Name: FAIROOZ	Bed No:	Age: 45 YEARS
Referred By: MEDICAL D	Result Date: 08-July-2017	Lab No: 746080717	Sex: MALE

Electrolytes

PARAMETERS	RESULT	UNIT	REFERENCE RANGE
Electrolyte			
	134.1	mmol/l	135---150
	3.74	mmol/l	3.5---5.1
	113.6	mmol/l	98----108

Lab Technician

Pathologist

**Dr. Muhammad Asghar**  
 Director Pathology  
 Assistant Professor Microbiology

**Dr. Safia Rahman**  
 Assistant Professor Chemical Pathology

**Dr. Naveed Sharif**  
 Assistant Professor Histopathology

**Dr. Neelam Ahmad**  
 Consultant Hematologist

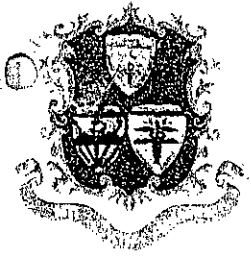
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 Microbiologist / Administrator

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 Clinical Technologist

**Mr. Muhammd Riaz Khattak**  
 Clinical Technologist

**Mr. Habib Ullah Khan**  
 Biotechnologist  
 Incharge PCR Lab

E-mail: [pathology/ktih@gmail.com](mailto:pathology/ktih@gmail.com) Web Site: [www.kth.gov.pk](http://www.kth.gov.pk) Phone#091-92244007/Ext: 2047



# DEPARTMENT OF PATHOLOGY

Medical Teaching Institution,  
Khyber Teaching Hospital, Peshawar.



Hospital No: 2168160717	Patient Name: FAIROOZ	Bed No:
Referred To: MEDICAL D	Result Date: 08-July-2017	Lab No: 703070717

## Urine Culture Sensitivity

Time for C/S

Result: No growth obtained after 24 Hrs Aerobic Incubation at 37C

**Dr. Muhammad Asghar**  
Director Pathology  
Assistant Professor Microbiology

**Dr. Safia Rahman**  
Assistant Professor Chemical Pathology

**Dr. Naveed Sharif**  
Assistant Professor Histopathology

**Dr. Neelam Ahmad**  
Consultant Hematologist

**Mr. Noor Rehaman**  
Microbiologist / Administrator

**Mr. Sana Ullah**  
Clinical Technologist

**Mr. Muhammd Riaz Khattak**  
Clinical Technologist

**Mr. Habib Ullah Khan**  
Biotechnologist  
Incharge PCR Lab

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E-mail: [pathologykth@gmail.com](mailto:pathologykth@gmail.com) Web Site: [www.kth.gov.pk](http://www.kth.gov.pk) Phone#091-9224400-7/Ext-2047



# DEPARTMENT OF PATHOLOGY

Medical Teaching Institution,  
Khyber Teaching Hospital, Peshawar.



Hospital No: 2168160717	Patient Name: FAIROOZ	Bed No:
Referred To: MEDICAL D	Result Date: 07-July-2017	Lab No: 527070717

### Renal Profile

Urea	119.3	mg/dl	15----40
Creatinine	2.16	mg/dl	1.10----1.50

### RBS (Random Blood Sugar)

RANDOM BLOOD SUGAR (R)	82.6	mg/dl	70----140
------------------------	------	-------	-----------

**Dr. Muhammad Asghar**  
Director Pathology  
Assistant Professor Microbiology

**Mr. Noor Rehman**  
Microbiologist/Administrator  
Technician

**Dr. Safia Rahman**  
Assistant Professor Chemical Pathology

**Mr. Sana Ullah**  
Clinical Technologist

**Dr. Naveed Sharif**  
Assistant Professor Histopathology

**Mr. Muhammd Riaz Khattak**  
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Consultant Hematologist

**Mr. Habib Ullah Khan**  
Biotechnologist  
Incharge PCR Lab  
Pathologist

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E-mail: pathology@kthogmail.com

1730924

**KHYBER TEACHING HOSPITAL, PESHAWAR**

**INVESTIGATION REQUEST FORM**

Name: Feroz Age: \_\_\_\_\_ Sex: \_\_\_\_\_

Ward: MDW. <sup>MCW.</sup> Bed No: 39 Consultant: \_\_\_\_\_

Clinical Features:

Investigation Required:

*urine for ketones*

Dated: 6/7/17

Registrar/M.O.



# KHYBER TEACHING HOSPITAL, PESHAWAR

## INVESTIGATION REQUEST FORM

Name FEROZ Age \_\_\_\_\_ Sex \_\_\_\_\_  
Ward PRB Bed No 12 Consultant \_\_\_\_\_

Clinical Features:

Investigation Required:

FBSm & ex

104

Dated 08/07/2017

[Signature]  
Registrar/M.O.

Pathologist



**KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR**

No. 1017 1ST

Dated: 13-5- /2022

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281  
Fax:- 091-9213262

To

The Superintendent of Police FRP,  
Government of Khyber Pakhtunkhwa,  
Peshawar Rang Peshawar.

Subject: JUDGMENT IN APPEAL NO. 1588/2019, MR. IMRAN.

I am directed to forward herewith a certified copy of Judgement dated 21.01.2022 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR

KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR