


FORM OF ORDER SHEET

Court of _____

Appeal No. 749/2024


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/06/2024	<p>The appeal of Mr. Muhammad Bilal resubmitted today by Mr. Saifullah Mohib Kakakhel Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 05.06.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Muhammad Bilal received today i.e on 27.05.2024 is incomplete on the following score which is returned to the appellat for completion and resubmission within 15 days.

- 1- Copy of departmental appeal and revision petition mentioned in the memo of appeal are not attached with the appeal be placed on it.
- ② Address of appellat is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Annexure-F of the appeal is illegible be replaced by legible/better one.

No. 82 /Inst;/2024/KPST,

Dt. 29/05 /2024.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

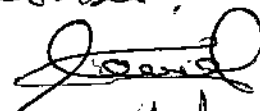
Saifullah Mohib Kakakhel Adv.
High Court Peshawar.

R/Sir,

- Re-submitted after completion of the deficiencies raised by your good office
- 1- placed on pg#39-A & 39-B.
 - 2- As per instruction of client the address mentioned is correct.
 - 3- legible/better copy is placed.

The case may kindly be fixed before this Honorable Tribunal for hearing.

counsel



3/6/2024

S/C

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 249/2024

Muhammad Bilal

.....Appellant

VERSUS

Inspector General of Police (IGP), Khyber Pakhtunkhwa, Peshawar
and others


.....Respondents

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Appellant

Through


Saifullah Muhib Kakakhel
Advocate Supreme Court
Cell No. 0334-4440744

Dated 24/05/2024

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No 749/2024

Muhammad Bilal S/o Muhammad Iqbal R/o Village Katahat, Tehsil
Rustam District Mardan

.....Appellant

VERSUS

1. Inspector General of Police (IGP), Sahibzada Abdul Qayyum
Road, Civil Secretariat Peshawar, Khyber Pakhtunkhwa.
2. Regional Police Officer (RPO), District Mardan.
3. District Police Officer (DPO), District Swabi

..... Respondents

**SERVICE APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED ORDER DATED
15.06.2022 PASSED BY RESPONDENT NO. 03,
WHEREBY MAJOR PENALTY WAS IMPOSED ON
THE APPELLANT BY DEMOTING HIM FROM
SENIOR CLERK TO JUNIOR CLERK AND
AGAINST IMPUGNED ORDER OF TERMINATION
DATED 18.08.2023 AGAINST WHICH HE
SUBMITTED APPEAL TO RESPONDENT NO. 1 &
2, WHICH WAS ALSO DISMISSED/ REJECTED
AND THE MAJOR PENALTY OF TERMINATION
WAS UPHELD.**

Respectfully Sheweth:

1. That appellant was appointed as Junior Clerk on 19.06.2009
in the police department and he performed his duties to
the best of his abilities and satisfaction of the superiors.

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(Copies of the initial appointment order of Junior Clerk dated 19.06.2009 and salary Slip are attached as annexure "A").

2. That the appellant due to his performance in the department was promoted to the post of Senior Clerk in 2019.
3. That the appellant was posted to Swabi and started performing his duties in the office of S.P Investigation, Swabi.
4. That the appellant was suffering from cardiac disease and was facing 'Angina' (Heart Pain) due to the reason that he would work till late hours in the office and he had clots in the body as it is in the knowledge of this Hon'ble Court that investigation of entire work of the office is run by the clerical staff and the investigation of police continues 24 hours.
5. That due to lack of staff in the office, the appellant would be asked by the superiors to stay in the office and work without any appreciation as well as overtime, therefore, he suffered from Angina pain which was well informed to the superiors but instead of giving him leave, the high-ups would demand overtime and therefore, finally he was referred to the hospital and he was thoroughly examined and the prescriptions were duly verified by the respondent No. 1. **(Copies of the prescription and verification letters dated 08.03.2024 & 12.03.2024 are attached as Annexure "B & C").**

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6. That his leave was not considered as leave and due to malafide of the superiors for not working in the severe pain and anxiety, he was imposed major penalty by reverting him from post of Senior Clerk to Junior Clerk and that also for lifetime. **(Copy of the impugned order of reversion from the post of Senior Clerk to Junior Clerk dated 15.06.2022 is attached as annexure D).**
7. That subsequently the same office did not consider his leave and absented him even though he attended the office throughout the period which is mentioned in the impugned order and show cause et cetera. **(Copies of the show cause notice et cetera are attached as annexure E).**
8. That even though he was performing duties in the office he was not informed regarding the transfer order to District Mohmand and when he came into knowledge about the fact, he rushed to the office DPO District Mohmand but he was asked to report to the office of DPO District Swabi as he has been placed under suspension without any lawful justification.
9. That the appellant was made a rolling stone and his office took work from him and later on due to malafide terminated him as he could not work after office hours which was due to his cardiac issue.
10. That the impugned orders dated 15.06.2022, whereby he was deviated from the post of Senior Clerk to Junior Clerk and impugned order of termination dated 18.08.2023 are

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illegal, without lawful authority, without jurisdiction and due to malafide. **(Copies of impugned order dated 18.08.2023 and orders of Respondents No.1 & 2 are attached as annexure F, G & H).**

11. That the impugned orders are passed by an incompetent authority and as per the judgments of Superior Courts, such orders are void ab-initio and liable to be set aside. The department issued an addendum dated 27.08.2017, whereby the disciplinary proceedings can be initiated by the designated officers against the ministerial staff. **(Copy of the addendum dated 27.08.2017 is attached as annexure I).**
12. That the procedure laid down in the Government Servants (Efficiency & Discipline Rules, 2011 are not followed in the case of appellant from the very beginning of the inquiry and no opportunity of being heard has been provided to him what to talk of going through his medical record and performance.
13. That appellant is not being treated in accordance with law and is being discriminated against.
14. That the competent authority is stepping upon valuable rights guaranteed and protected by the Constitution and other laws of Pakistan.
15. That there is no legal remedy available to the appellant except to file an Service Appeal for want of justice, this being a proper remedy and a lawful forum, hence the

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indulgence of this Hon'ble Tribunal is sought for the grant of relief.

It is, therefore, respectfully prayed that on acceptance of this Service Appeal, the impugned orders dated 15.06.2022, whereby he was demoted from the post of Senior Clerk to Junior Clerk and impugned order of termination dated 18.08.2023 may kindly be set aside being illegal, without jurisdiction, without lawful authority and against the rules besides being discriminatory and due to ulterior motives.

Any other order deemed appropriate in the circumstances of the case may also be passed. The Appellant may be allowed to put forward any other argument/ document at the time of hearing of this Service Appeal.

Bial
Appellant

Through

Saifullah
Saifullah Muhib Kakakhel
Advocate Supreme Court
Cell No. 0334-4440744

Dated: ___/05/2024

CERTIFICATE

Certified that as per instructions of my client, that this is the first Service Appeal on the subject before this Honourable Tribunal.

Saifullah
ADVOCATE

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. ____/2024

Muhammad Bilal

.....Appellant

VERSUS


Inspector General of Police (IGP), Khyber Pakhtunkhwa, Peshawar
and others

.....Respondents

AFFIDAVIT

I, Muhammad Bilal S/o Muhammad Iqbal R/o Village Katahat, Tehsil Rustam District Mardan (**Appellant**), do hereby solemnly affirm and declare on oath that the contents of accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

Identified by:


Saifullah Muhib Kakalhel
Advocate Supreme Court



DEPONENT
CNIC#1610192111707
Cell # 03700193002

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

6/A

Service Appeal No. ____/2024

Muhammad Bilal

.....Appellant

VERSUS

Inspector General of Police (IGP), Khyber Pakhtunkhwa, Peshawar
and others

.....Respondents

Appellant:


Muhammad Bilal S/o Muhammad Iqbal R/o Village Katahat,
Tehsil Rustam District Mardan

Respondents:

1. Inspector General of Police (IGP), Sahibzada Abdul Qayyum
Road, Civil Secretariat Peshawar, Khyber Pakhtunkhwa.
2. Regional Police Officer (RPO), District Mardan
3. District Police Officer (DPO), District Swabi

Through

Appellant


Saifullah Muhib Kakakhel
Advocate Supreme Court
Cell No. 0334-4440744

The entries in this page should be renewed or re-attested at least every five years and the signature 9 and 10 should be dated.

Name: Muhammad Bilal

Race: _____

Residence: Kata Cheli Teh & Ngr Maud

Father's name and residence: Muhammad Iqbal

Date of birth by Christian era as nearly as can be ascertained: 28-10-1925

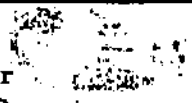

Exact height by measurement: 5' 07"


Date _____

Personal marks for identification: Mark on chin


Left hand thumb and finger impression of (Non-Gazetted) officer:

Little Finger  Ring Finger

Middle Finger  Fore Finger 

Thumb 

Signature of Government Servant: Bilal

Signature and designation of the Head of the Office, or other Attesting Officer. 

Government of Khyber Pakhtunkhwa
District Accounts Office Sawabi
Monthly Salary Statement (May-2022)

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Personal Information of Mr MUHAMMAD BILAL d/w/s of MUHAMMAD IQBAL

Personnel Number: 00322759 CNIC: 1610192111707 NTN:
Date of Birth: 28.10.1985 Entry into Govt. Service: 10.05.2006 Length of Service: 16 Years 00 Months 023 Days

Employment Category: Active Temporary

Designation: SENIOR CLERK

80004454-GOVERNMENT OF KHYBER PAKH

DDO Code: SU4015-SP INVESTIGATION SWABI

Payroll Section: 002

GPF Section: 008

Cash Center:

GPF A/C No: POL 52046

Interest Applied: Yes

GPF Balance:

99,954.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 14

Pay Stage: 8

Wage type	Amount	Wage type	Amount
0001 Basic Pay	24,540.00	1001 House Rent Allowance 45%	3,321.00
1210 Convey Allowance 2005	2,856.00	1300 Medical Allowance	1,500.00
2148 15% Adhoc Relief All-2013	422.00	2199 Adhoc Relief Allow @10%	288.00
2211 Adhoc Relief All 2016 10%	1,495.00	2224 Adhoc Relief All 2017 10%	2,454.00
2247 Adhoc Relief All 2018 10%	2,454.00	2264 Adhoc Relief All 2019 10%	2,454.00
2309 Adhoc Relief All 2021 10%	2,454.00	2315 Special Allowance 2021	3,500.00
2341 Dispr. Red All 15% 2022KP	3,681.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3014 GPF Subscription	-2,620.00	3530 Police wel:Fud BS-1 to 18	-491.00
4004 R. Benefits & Death Comp:	-600.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Instal	194,000.00	-7,500.00	171,500.00

Deductions - Income Tax

Payable: 0.00 Recovered till May-2022: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 51,419.00 Deductions: (Rs.): -11,211.00 Net Pay: (Rs.): 40,208.00

Payee Name: MUHAMMAD BILAL

Account Number: 109000210474361

Bank Details: UNITED BANK LIMITED, 210273 CANTT. BRANCH, , MARDAN

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: PESH

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City: PESH

Email:



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

"B"
10

No. 3161 /E-V, dated Peshawar the 08/03/2024

To: - The Senior Medical Officer
District Head Quarter
Teaching Hospital Mardan

Subject: - PROVISION OF INFORMATION

Enclosed please find herewith medical documents in respect of Muhammad Bilal Ex. (Junior Clerk) of police department alongwith prescriptions bearing No.498, 1003, 393, 1060 with mentioned dates for verification and report, please.

(Afsar Jan)
8/13/24
Registrar

JR For Inspector General of Police,
Khyber Pakhtunkhwa Peshawar

Medical slips



**OFFICE OF THE MEDICAL SUPERINTENDENT
DISTRICT HEADQUARTER HOSPITAL MARDAN.**

Ph # 0937-9230145 Fax # 9230226

msdhq09379230145@gmail.com

No 1235 /MS/PA

Dated 12/3 /2024

To,

The Registrar for Inspector General,
of Police Khyber Pakhtunkhwa,
Peshawar.

Subject: VERIFICATION OF MEDICAL DOCUMENTS.

Reference your Letter No. 3161 dated: 08/03/2024

The enclosed Medical Documents in respect of Mr. Muhammad Bilal Ex.(Junior Clerk) of police department along with Prescription No.498, 1003, 398, 1060 is hereby verified and found correct and returned for further necessary action please.


MEDICAL SUPERINTENDENT
DHQ HOSPITAL MARDAN

OUT-PATIENTS DEPARTMENT
DISTRICT HEAD QUARTER Rs. 10/-
TEACHING HOSPITAL MARDAN

NAME Jh 3 Mobile No. 0302-1933000
YEARLY NO. 1003
DATE 03-03-2023 CNIC#

Investigation

Adv
Ecg.

Lumbago.) Foradol
Angina) 1m stat.
Rx.

Phsio
for
6 days

Tab Brixin
w/1/1
Tab Neege 40
w/1/1
Tab Ascard 75
Tab Carvidan 625-125

Adv Complete bed rest -
for one month

Senior Medical Officer
Teaching Hospital Mardan

OUT-PATIENTS DEPARTMENT
DISTRICT HEAD QUARTER Rs. 10/-
TEACHING HOSPITAL MARDAN

NAME Jh Mobile No. 0302-1933000
YEARLY NO. 493
DATE 02-02-2023 CNIC#

Investigation

Adv
100
Ecg.

Back Pain
also cardiac PT

Rx

Tab Felden 100
1-1
Tab Zopart 10
10, 1/1
Tab Extore 10/100 (25)
Tab. Ascard 75
Tab Sustic 2-1
w/1/1

Adv
Complete rest

"C"

OUT-PATIENTS DEPARTMENT
 DISTRICT HEAD QUARTER Rs. 10/-
 TEACHING HOSPITAL MARDAN

NAME J. Khan Mobile No. 0302-19330000

YEARLY NO. 1060

DATE 5/04/2023 CNIC#

Investigation

- Immnd
- Backhak
- palpation
- varying

Tab. Senclof 75mg
 Tab. Mal-F
 VERIFIED Tab. parizol 4mg
 Tab. medrol 10mg
 Tab. esnat D
 Complete home bed rest for one month
 3 medicine
 3 medicine
 3 medicine

Medical Officer
 D.H.Q Hospital Mardan

OUT-PATIENTS DEPARTMENT
 DISTRICT HEAD QUARTER Rs. 10/-
 TEACHING HOSPITAL MARDAN

NAME J. Khan Mobile No. 0302-19330000

YEARLY NO. 399

DATE 24.04.2023 CNIC#

Investigation

Pain left side
 Chest

BP
 160/100

Rx:

Tab. Cafta-50
 Tab. Esso 40mg
 Tab. Biforge 10/160
 Adv
 Complete home bed rest for one month

Pheno Theraphy
 Continues

Medical Officer
 D.H.Q Hospital Mardan

DISTRICT HEAD QUARTER
TEACHING HOSPITAL MARDAN

NAME _____
YEARLY NO. _____
DATE _____

Investigation

✓ Jandice
Ding Ind road

5/11/2023
Rt. Side of chest

Cap. R. Side 4.5
infective

IM Mobil
191

Ad. Home road 2nd 2nd @ 2nd
with 2-11-23

Dr. Fazli Rabbi
C.M.O.
D.H.Q. Mardan

OUT-PATIENTS DEPARTMENT
DISTRICT HEAD QUARTER Rs. 10/-
TEACHING HOSPITAL MARDAN

NAME J. J. J. Mobile No. 302-197700
YEARLY NO. 1101
DATE 6/4/2023 CNIC# _____

Investigation

- Backache
- Preseptation

7/15 Normal 25MB
✓ 12 100
7/15 B.P. 120/80
111
7/15 Pain at 40MB
100
7/15 NAC-F
100
7/15 Indix 10MB
111

VERIFIED

Signature
2513

Adc
- ECG
- X-RAY

Adc
Completed home bed
rest for one month
Medical Officer
D.H.Q. Hospital Mardan

Physician

Dr. Fazli Rabbi

M.B.B.S (KMC)

Chief Medical Officer

District Headquarter Hospital Mardan



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فزیشن
ڈاکٹر فضل ربی

ایم بی بی ایس (کے ایم سی)

ماہر امراض معدہ و پانکریس بی ای، بلا پریشر

کت، قانچ، شوگر، گرہ، گرہ، سرور، سرگی

چیف میڈیکل آفیسر ڈسٹرکٹ ہیڈ کوارٹرز ہسپتال مردان

Name:

محمد

محمد ربی

Age

Sex

Date

17-1-2

Clinical Record

Prof. 2nd

Indica

Probs. acc.

دو ہفتہ آؤٹ کریا

Prof

✓
500 Leucos
WBC 2.4 2

Pro. Bilirubin due

✓
- Cap. Rise 40

✓
Al Myo

✓
two weeks bed rest

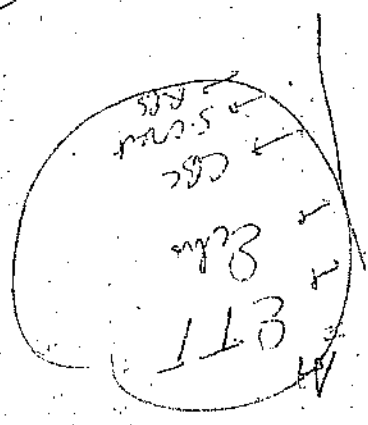
0300-5735980

0301-8938665

نوٹ: مریض نمبر لینے کے لیے اس نمبر پر رابطہ کریں۔

کلینک: بہادر میڈیکل سوسائٹی کے مقابل ڈی ایچ کیو ہسپتال سٹریٹ روڈ مردان

Dr. Shafiq
 Associate Professor
 Cardiology, PIC, Peshawar



ETT = clear
 Case No. 1
 Case No. 2
 Case No. 3

BP 14.5/9.9
 HR 7.5b/min
 SpO2 98%
 Temp 36°C

CP
 CP
 CP

④ → ETT
 Tab - Estan 10mg
 ⑤ → 5=11
 Tab - ALP 0.5
 ⑤ → ① + ①
 Tab - Management

Management per literature +
 ① + ①
 ① + ①
 ① + ①

ETT
 Management per literature +
 ① + ①
 ① + ①
 ① + ①

① + ①
 ① + ①
 ① + ①
 ① + ①

① + ①

① + ①



ACCIDENT & EMERGENCY DEPARTMENT
PESHAWAR INSTITUTE OF CARDIOLOGY
MEDICAL TEACHING INSTITUTION
(PIC-MTI)

Patient : EME00011973

Muhammad Bilal

Serial # 64854

Father/Husband : MUHAMMAD ICBAL

37 Year Male

Invoice # : K05220 75281

Date : 10-OCT-22 23 53.34

Receipt #

17

Diagnosis: HTN (+)

Complaints:

Chest heaves,
sweating,

Rx

- Chest Burden } → 1-2 days
 - Usually Agitates with
 Cautions

Findings:

Bp: 147/100

HR: 80 bpm

SpO₂: 94%

RR: 20

Investigations:

Ecg
ECG

ECG - 137.130/96 mHg. chest
 - HR 80 bpm
 - Temp. Normal
 - SpO₂ - 94%

ECG - 137.130/96
 Temp. Normal

Follow-up in
 OPD. Tomorrow
 For further instructions

Diagnosis:

Am Suleaby Bilal
 Muhammad

Next Visit:

Consultant Name:

Signature:

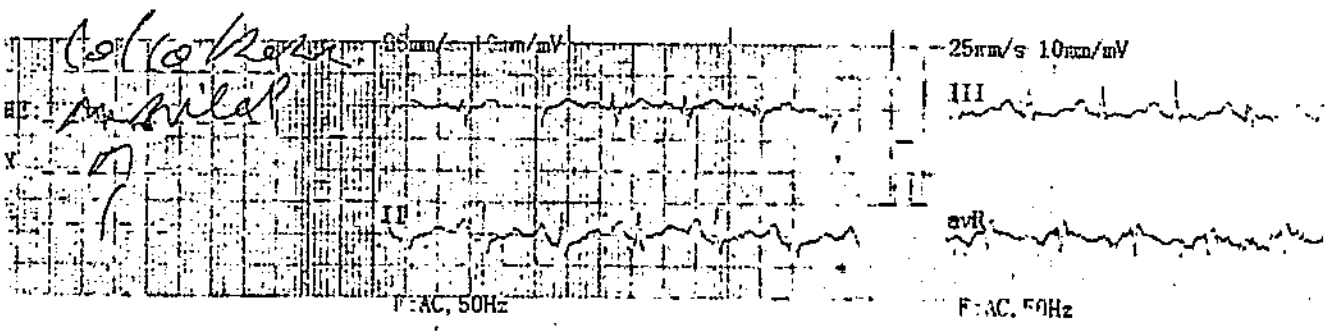
5-A, Sector B-3, Phase-V, Hayatabad Peshawar - Pakistan

Phone: 00 92 91 9219641-5

Website: www.pic.edu.pk

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F-AC, 50Hz



Peshawar Institute of Cardiology
 Peshawar Institute of Cardiology, Phone: 0092 921 9641, Fax: --
 Email: info@pic.edu.pk, Website: www.pic.edu.pk

Invoice

ORIGINAL

Patient Name : MUHAMMAD BILAL
 Father/Husband Name : MUHAMMAQ IOBAL
 Donor/MRNO :
 Name :
 Sex : Male Age : 37 Year(s)
 Date of Birth : 10-10-1985 NIC #: 1610192111707
 Address :
 Phone Number : 0306 5496476

Medical Record No. : EME-00011973
 Order # : 22-0138372
 Invoice # : K05220779331
 Invoice Date : 11-OCT-2022 01:04 PM
 Receipt # : K05220139332

* Access Code : 01557557

Sr No	CPT ID	Description	Unit	Qty	Actual Price	Stat Charge	Discount	Amount	Request Date	Invoice Name	Dr
Pathology											
1	85025	CBC - Auto Differential	NO	1	480.00			480.00	11-10-2022 05:04 PM		
2	84949	GLUCOSE RANDOM	NO	1	150.00			150.00	11-10-2022 05:04 PM		
3	84296	CREATININE - SERUM	NO	1	150.00			150.00	11-10-2022 05:04 PM		
Total Amount								700.00			
Cash								700.00			

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VIEW 11-Oct-2022 01:14:58

Chemical Pathology Report

Page 1 of 1

Dept Ref : K05RCH22032609
MRNO : K05-EME00011973
Name : MUHAMMAD BILAL
Age/Sex : 33/ Year(s)/Male
Phone : 0305 5496176
Address : , MARDAN - PAKISTAN

Ordered By :
In-house Consultant : Dr Anwar Iqbal
Requested : 11-OCT-2022 00:01:33
Specimen Received : 11-OCT-2022 00:34:20
Reported : 11-OCT-2022 01:02:01

SPECIMEN : SERUM

TEST(s)	RESULT(s) UNITS	REFERENCE RANGE
Troponin-I	0.001 ng/mL	< 0.6

Note:

This Is High Sensitive Troponin I.

This Test Is Performed By Cmia Method On Abbot Architect Ci 4100 System.

Mushtaq Hussain
Sr. Medical Technologist

Electronically verified report, no signature(s) required.

DR RASHID AZEEM
MBBS + CPS IN MATOLOGY

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VIEW: 11-Oct-2022 01:15:00

Chemical Pathology Report

Page: 1 of 1

MIRNO: K05-EME00011973
 Name: MUHAMMAD BELAL
 Age/Sex: 37 Year(s)/Male
 Phone: 0305 5496476
 Address: MARDAN - PAKISTAN

Ordered By:
 In-house Consultant: Dr Shah Zeb
 Report Destination:
 Requested: 11-OCT-2022 00:06:19
 Specimen Received: 11-OCT-2022 01:01:17
 Reported: 11-OCT-2022 01:01:17

Chemistry - I

TEST(s)	NORMAL	UNIT(s)	K05RCH22032800 11-OCT-2022 01:02:01
SODIUM	135 - 150	mmol/L	135.3
POTASSIUM	3.5 - 5.3	mmol/l	3.64
CHLORIDE	96 - 112	mmol/l	103.2
CREATININE	0.64 - 1.2	mg/dL	0.86
eGFR	> 60	ml/min/1.73 m ²	100.05
Troponin-I	< 0.6	ng/ml	0.001
URIC ACID NITROGEN	10 - 20	mg/dL	10

Note: Lab values should always be correlated with clinical picture.
 Normal Range(s) and Unit(s) shown are for most recent results.

Mushtaq Hussain
 Sr. Medical Technologist

Electronically verified report, no signature(s) required.

DR RASHID AZEEM
 CLINICAL CHEMIST

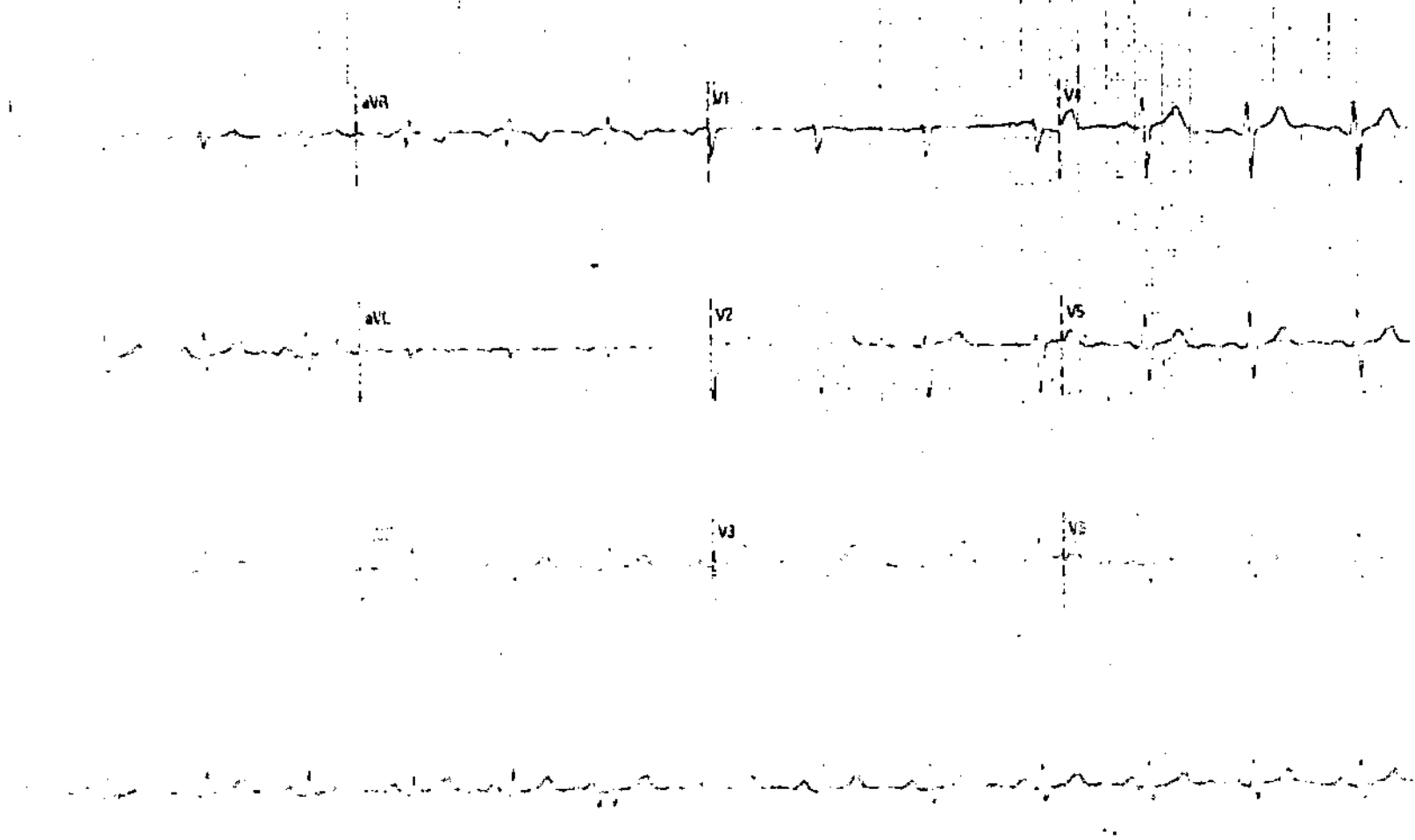
ID: 202210102330302
Age:
Gender:

1473

2022-10-10 23:33:53
Vent Rate 60 bpm
PR Interval 154 ms
QRS Duration 80 ms
QT/QTc Interval 332/335 ms
P/QRS/T Axes 74/102/81 deg
Dr. Hodges

Sinus rhythm
Interpretation made without knowing patient's gender, age
Rightward axis
Borderline ECG

Unconfirmed Diagnosis.



(10)



ECHOCARDIOGRAPHY REPORT

P.R.No	: K0SEME00011973	Visit Date	: 11-OCT-22
Name	: MUHAMMAD BILAL	Referred by	:
DOB/Age	: 10-OCT-89/ 37 Year(s)	IP/OP	: OPD
Gender	: Male	Report Date	: 11-OCT-22
Height(cm)	: 165	Weight(Kg)	: 65
GPT	: 93326 - ECHO	Medical History	:
Indications	: Palpitation		

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Mode / 2-D Measurements		Normal	Normal
VSD (Systolic)	30	mm(<40)	LVDD (Diastolic) 44 mm (< 58)
Septal Thickness	10	mm(<11)	Posterior Wall Thickness 10 mm (< 11)
Left Atrium Diameter	33	mm(<40)	
RV EDD	20	mm	
Sinus of Valsalva	28	mm(<37)	

Chambers

Left Ventricle : Normal. Wall thickness is normal. Normal left ventricular global and regional systolic function. Visually estimated ejection fraction is approximately 63 %.

Left Atrium : Normal in size.

Right Ventricle : Normal in size. Normal right ventricular wall thickness. Normal right ventricular systolic function.

Right Atrium : Normal in size.

Valve

Aortic : Normal mobility and thickness.

Mitral : Normal mobility and thickness.

Pulmonic : Normal mobility and thickness.

Tricuspid : Normal thickness and mobility.

Study Quality: Study quality is adequate.

IAS/IVS: Intact. Intact.

Pericardium: Pericardium is normal.

Conclusion:

Normal LV Systolic Function

Recommendation:

DR ABID ULLAH;

Consultant Cardiologist
 Assistant Professor, PIC-MTI

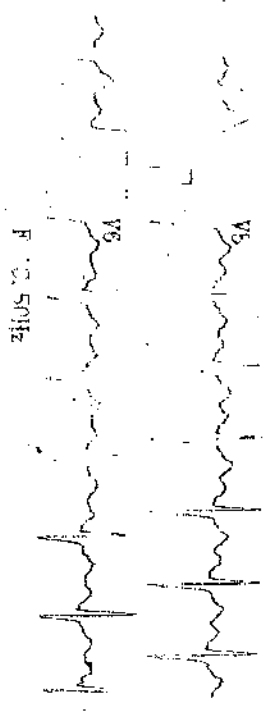
Electronically verified by, no signature(s) required.

ID

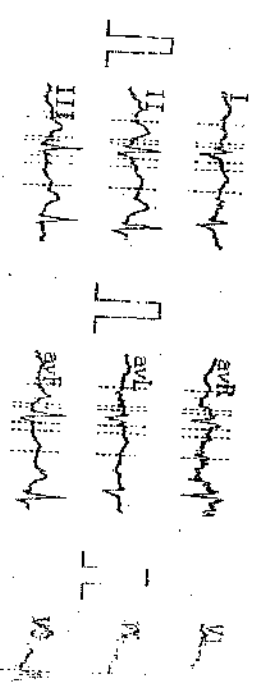
10/10/2014

25mm/s 10mm

25mm/s 10mm/mV



F 0.5mV



23

24



VIEW: 11-Oct-2022 15:45:47

Haematology Report

Page 1 of 1

MRNO : KOS-EMEG0013073
Name : Muhammad Bilal
Age/Sex : 37 Year(s)/Male
Phone : 0306 5496476
Address : MARDAN - PAKISTAN

Ordered By :
In-house Consultant :
Report Destination :
Requested : 11-OCT-2022 13:03:55
Specimen Received : 11-OCT-2022 13:14:03
Reported : 11-OCT-2022 14:05:16

CBC

TEST(S)	NORMAL	UNIT(S)	KOSHEM22028745 11-OCT-2022 14:05:16
WBC	4 - 11	10 ³ /UL	5.87
RBC	4 - 6		6.46
HGB	11.5 - 17.0	g/dL	19.4
HCT	36 - 54	%	66.72
MCV	76 - 96	fL	103.3
MCH	27 - 33	pg	30.03
MCHC	33 - 35	g/dL	29.09
%RDW-CV	11.5 - 14.5	%	13.88
PLT	150 - 450	10 ³ /UL	315
MPV	7.2 - 11	fL	7.06
%Neut	40 - 75	%	60
%LYMP	20 - 45	%	30
%MONO	2 - 10	%	8
%EOS	0 - 6	%	2
%BASO	0 - 1.5	%	0
#NEUT	1.9 - 8		3.45
#LYMP	0.9 - 5.2		1.69
#MONO	0.16 - 1		0.59
#EOS	0 - 0.6		0.12

Note: Lab values should always be correlated with clinical picture.
Normal Range(s) and Unit(s) shown are for most recent results.

Irfan Ullah Karim
Sr. Medical Technologist

Electronically verified report, no signature(s) required.

DR RASHID AZEEM
MBBS, FCPS-HEMATOLOGY



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VIEW: 11-Oct-2022 15:45:46

Chemical Pathology Report

Page 1 of 1

MRNO : K05-ENE90011973
 Name : Muhammad Dilal
 Age/Sex : 37 Year(s)/Male
 Phone : 0306 5496476
 Address : , MARDAN - PAKISTAN

Ordered By :
 In-house Consultant :
 Report Destination :
 Requested : 11-OCT-2022 13:03:55
 Specimen Received : 11-OCT-2022 13:14:03
 Reported : 11-OCT-2022 14:28:56

Chemistry - I

TEST(s)	NORMAL	UNIT(s)	K05RCH22032908 K05RCH22032800	
			11-OCT-2022 14:28:56	11-OCT-2022 01:02:01
SODIUM	135 - 150	mmol/L		135.3
POTASSIUM	3.5 - 5.1	mmol/L		3.64
CHLORIDE	96 - 112	mmol/L		103.2
GLUCOSE (RANDOM)	70 - 140	mg/dL	87	
CREATININE	0.61 - 1.2	mg/dL	0.84	0.86
eGFR	> 60	mL/min/1.73 m ²	102.8	100.05
Troponin-I	< 0.6	ng/mL		0.001
UREA NITROGEN	10 - 20	mg/dL		10

Note : Lab values should always be correlated with clinical picture.
 Normal Range(s) and Unit(s) shown are for most recent results.

Khalid Hussain
 Sr. Medical Technologist

Electronically verified report, no signature(s) required.

DR RASHID AZEEM
 MBBS, FCPS-HEMATOLOGY

REST ECG / 4 * 2.5s + 1 Rhythm

PESHAWAR INSTITUTE OF CARDIOLOGY

Muhammad Bilal

Patient ID: 11973

10/11/2022

Male 160 in 81 lbs

3:31:10pm

37yrs Asian

Vent. Rate 63bpm

Blood Pressure: 140/90 mmHg

PR interval 132ms

Technician: =CFG_UserNam

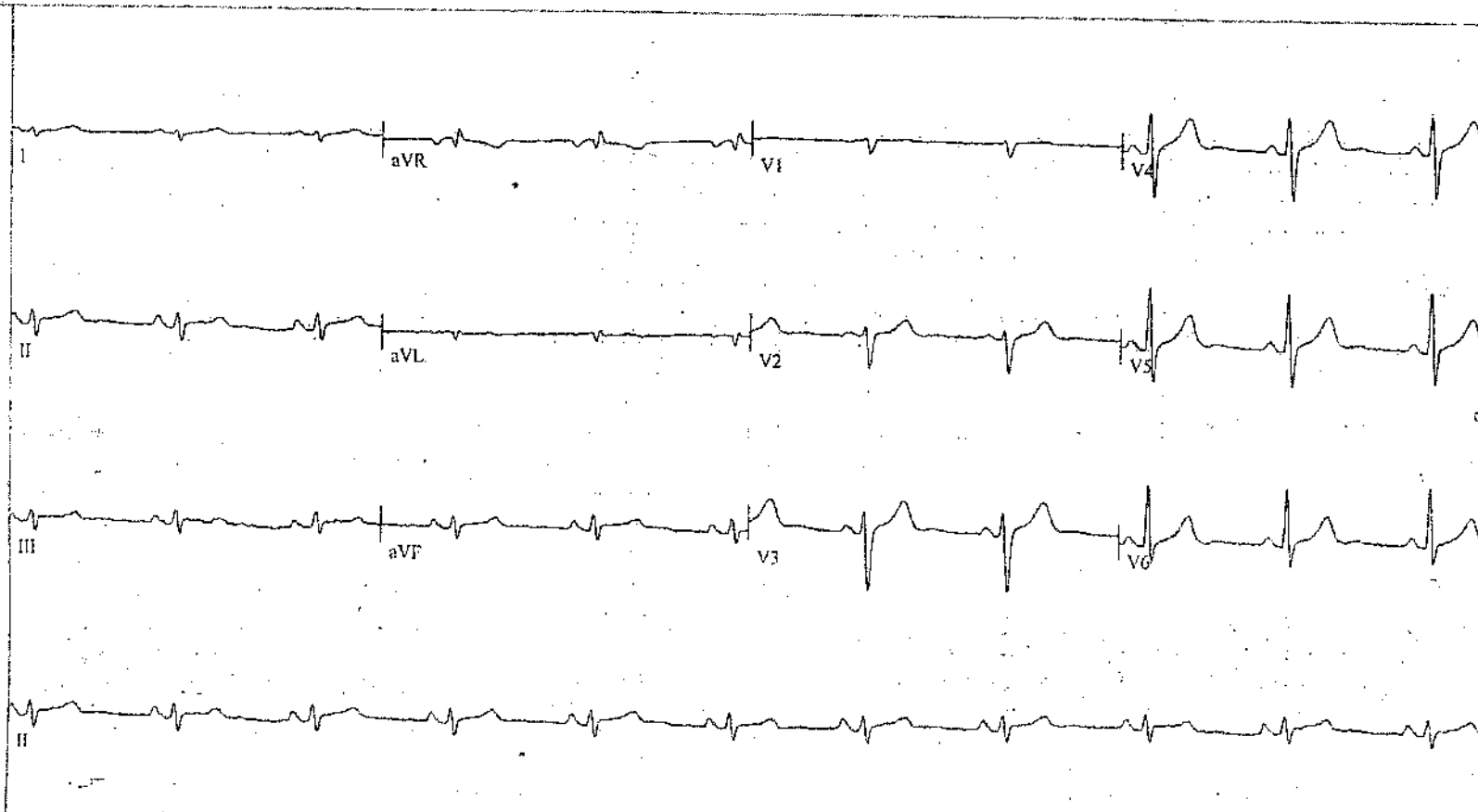
QRS duration 98ms

QT/QTc 408/417ms

P-R-T axes 72/111/69°

P duration 104ms

RR/PP interval 946/950ms



GE CardioSoft V6.73(2)

25mm/s 10mm/mV 0.01-20Hz 60Hz Spline 12SL V21

Unconfirmed

Acquisition APPS

Muhammad Bilal,
Patient ID 11973
10/11/2022
3:35:19pm

110 bpm

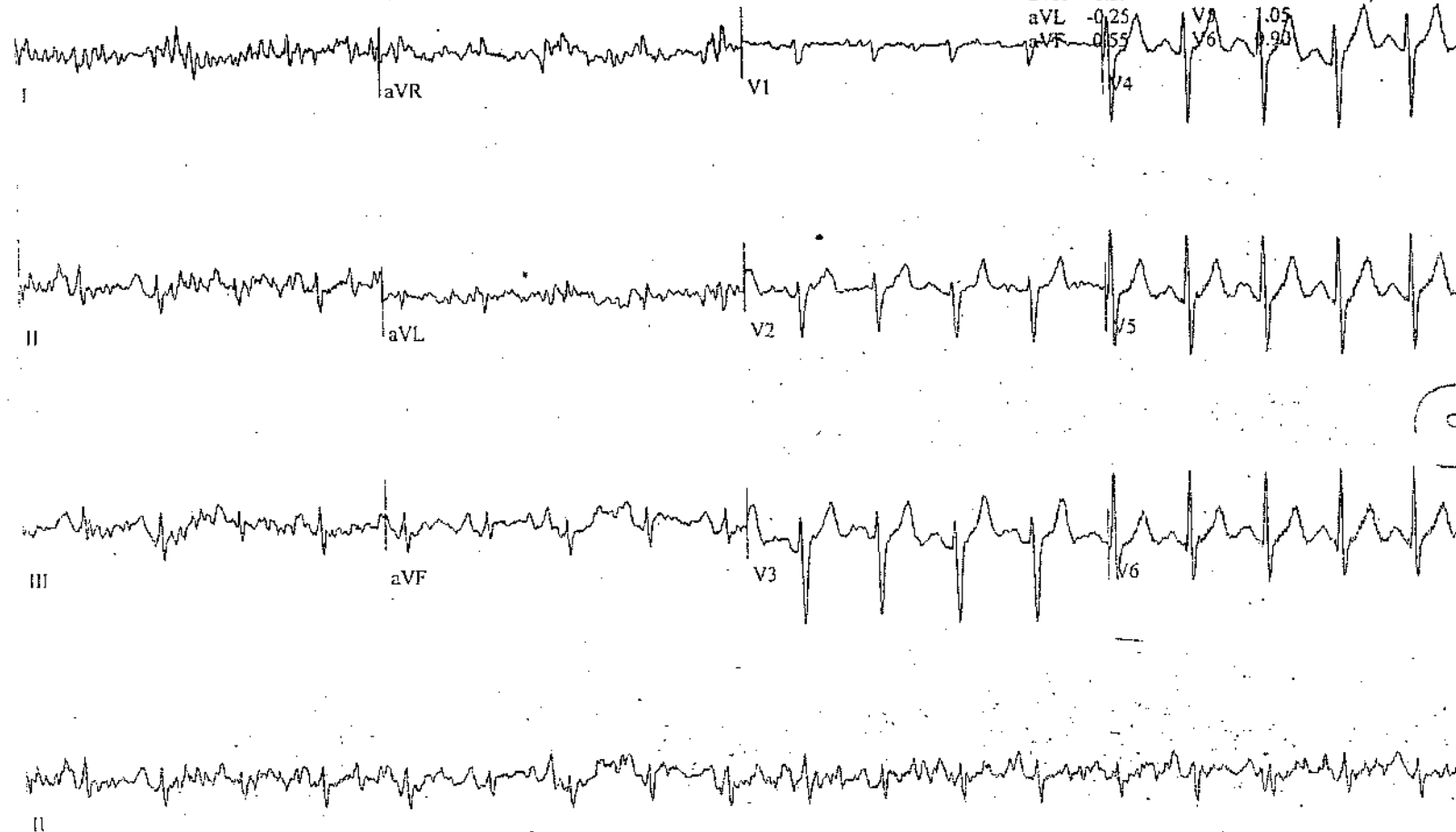
12-Lead Report
EXERCISE
STAGE 1
02:50

BRUCE
1.7 mph
10.0 %

PESHAWAR INSTITUTE OF CARDIOLOGY

Measured at 32ms Post J (10mm/mV)
Auto Points

Lead	ST(mm)	Lead	ST(mm)
I	0.00	V1	0.25
II	0.50	V2	0.65
III	0.50	V3	1.35
aVR	-0.25	V4	1.40
aVL	-0.25	V5	1.05
aVF	0.55	V6	0.90



Muhammad Bilal,
Patient ID 11973
10/11/2022
3:38:19pm

133 bpm

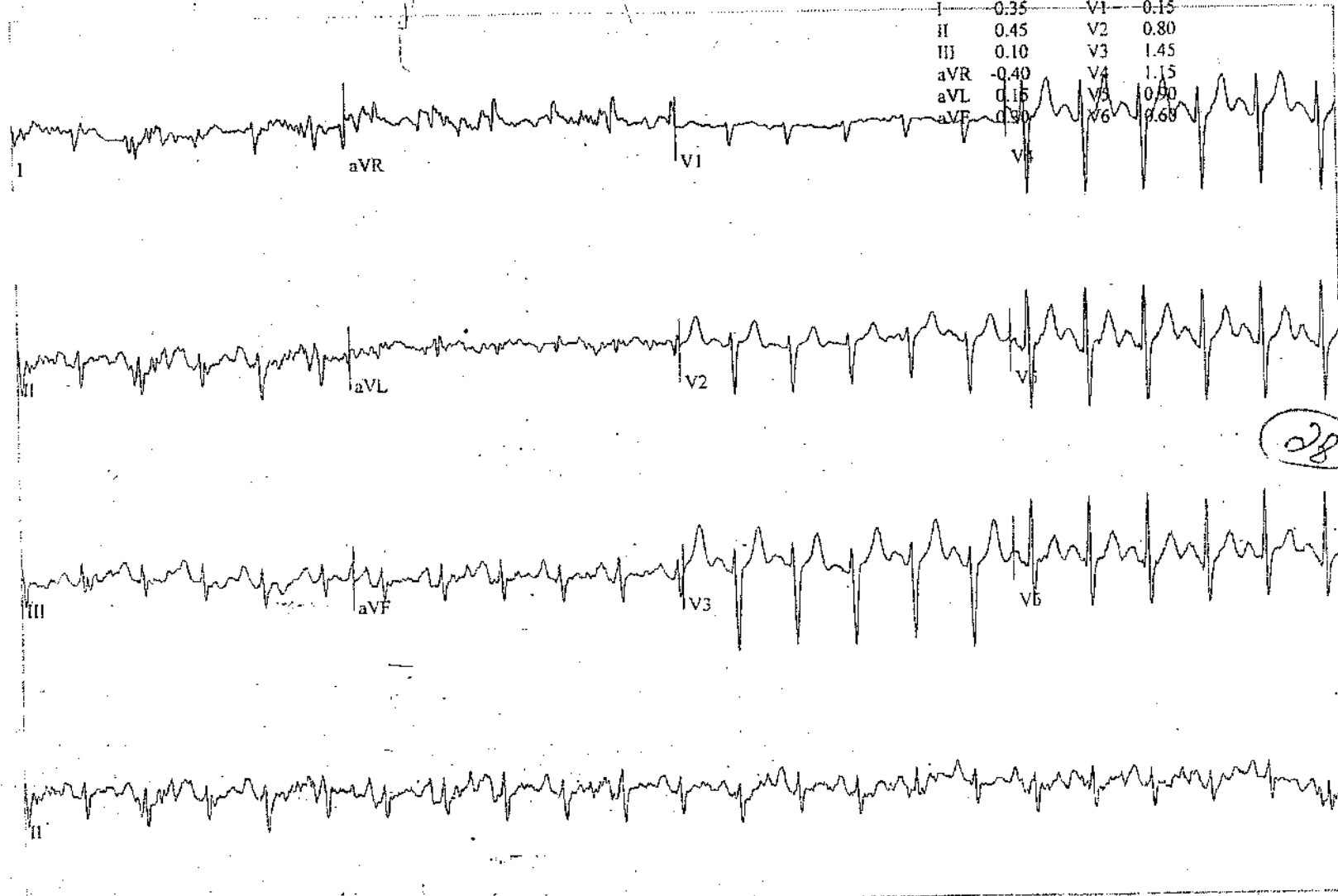
12-Lead Report
EXERCISE
STAGE 2
05:50

BRUCE
2.5 mph
12.0 %

PESHAWAR INSTITUTE OF CARDIOLOGY

Measured at 26ms Post J (10mm/mV)
Auto Points

Lead	ST(mm)	Lead	ST(mm)
I	-0.35	V1	-0.15
II	0.45	V2	0.80
III	0.10	V3	1.45
aVR	-0.40	V4	1.15
aVL	0.15	V5	0.90
aVF	0.90	V6	0.69



Muhammad Bilal,
Patient ID 11973
10/11/2022
3:41:19pm

164 bpm

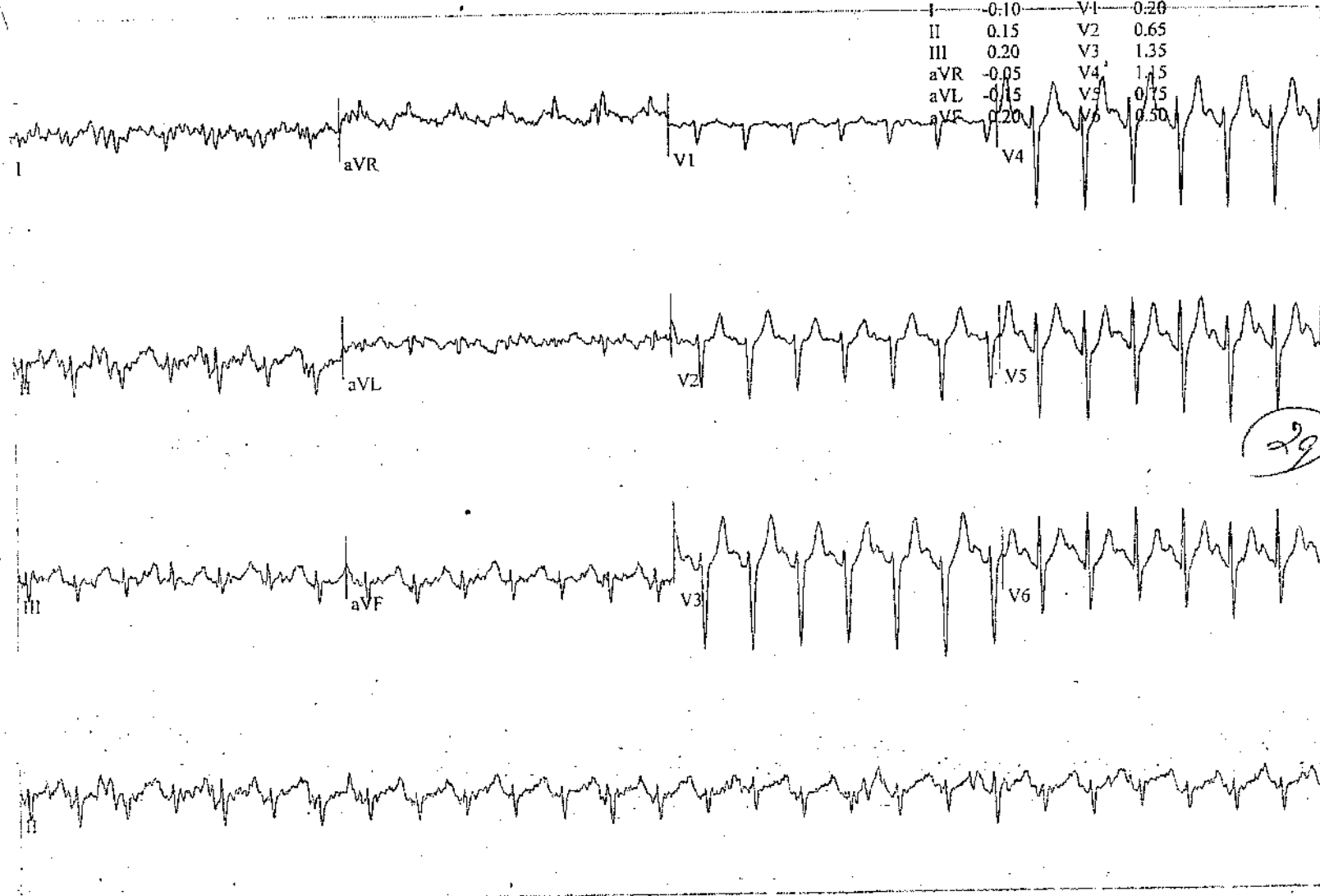
12-Lead Report
EXERCISE
STAGE 3
08:50

BRUCE
3.4 mph
14.0 %

PESHAWAR INSTITUTE OF CARDIOLOGY

Measured at 22ms Post J (10mm/mV)
Auto Points

Lead	ST(mm)	Lead	ST(mm)
I	-0.10	V1	0.20
II	0.15	V2	0.65
III	0.20	V3	1.35
aVR	-0.05	V4	1.45
aVL	-0.15	V5	0.75
aVF	0.20	V6	0.50



Muhammad Bilal,
Patient ID 11973
10/11/2022
3:41:58pm

171 bpm
160/95

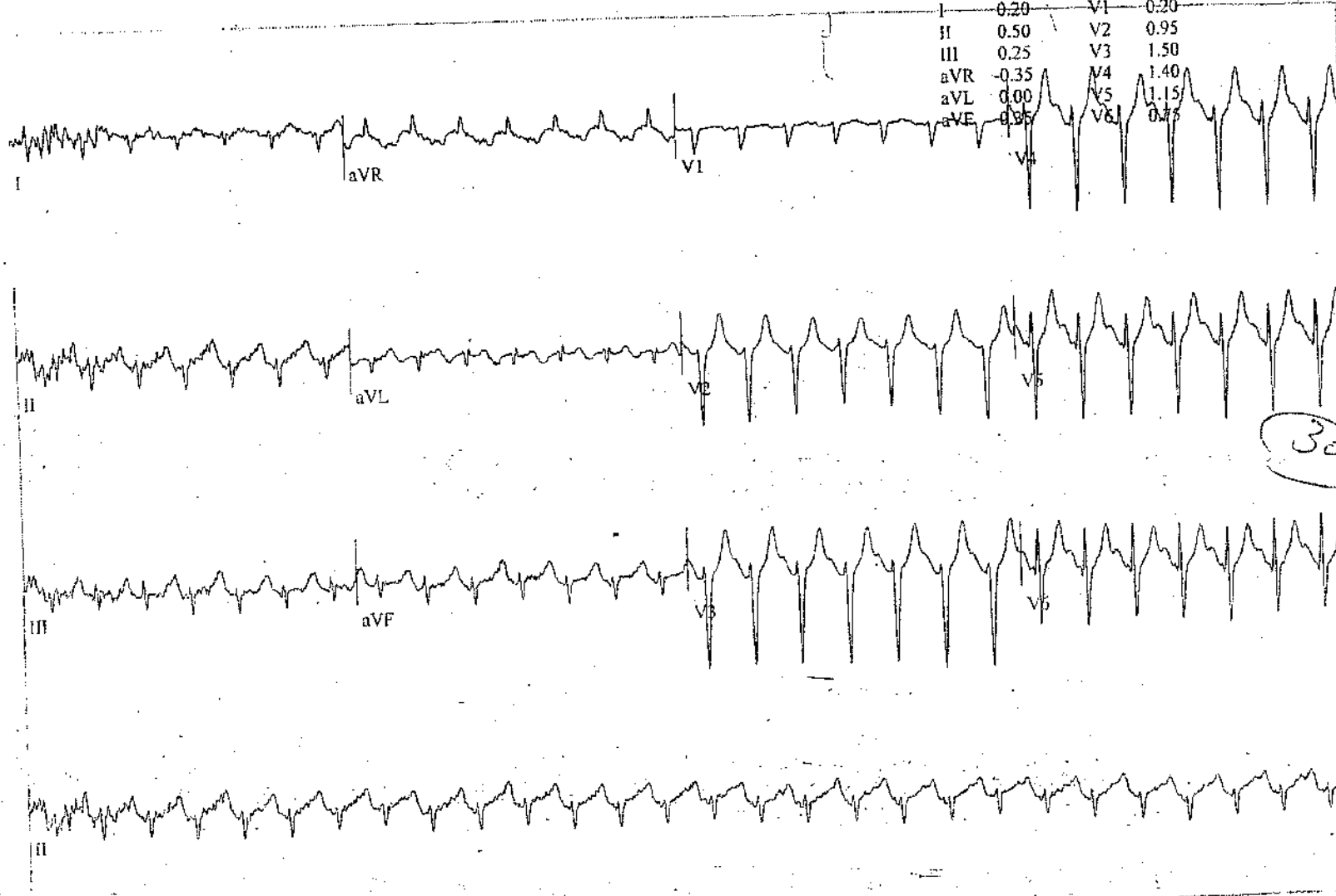
12-Lead Report (PEAK EXERCISE)
EXERCISE STAGE 4
09:29

BRUCE
0.0 mph
16.0 %

PESHAWAR INSTITUTE OF CARDIOLOGY

Measured at 22ms Post J (10mm/mV)
Auto Points

Lead	ST(mm)	Lead	ST(mm)
I	0.20	V1	0.20
II	0.50	V2	0.95
III	0.25	V3	1.50
aVR	-0.35	V4	1.40
aVL	0.00	V5	1.15
aVF	0.95	V6	0.75



Muhammad Bilal,
Patient ID 11973
10/11/2022
3:2:14pm

164 bpm

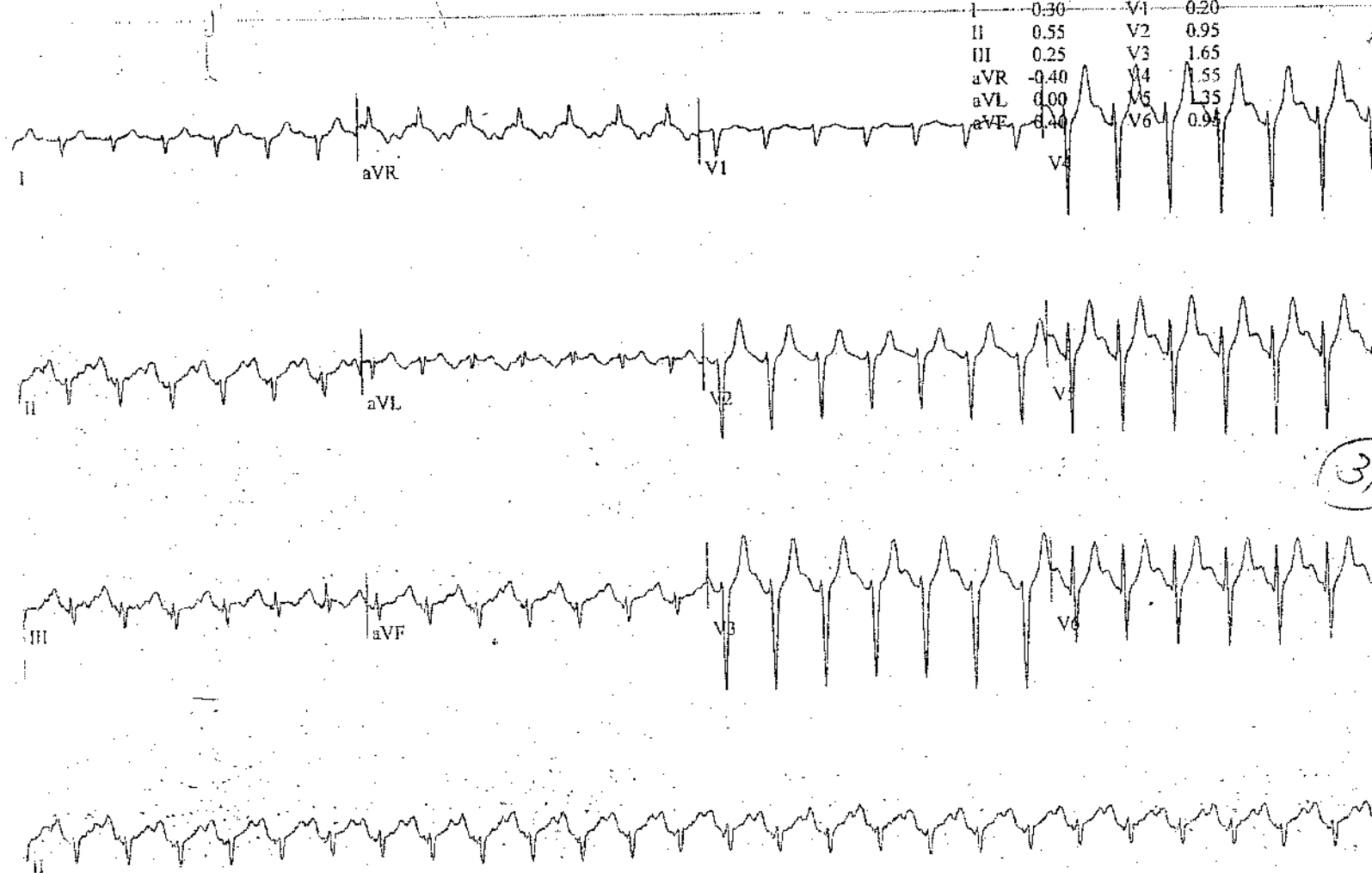
12-Lead Report
RECOVERY
#1
00:16

BRUCE
0.0 mph
0.0 %

PESHAWAR INSTITUTE OF CARDIOLOGY

Measured at 22ms Post J (10mm/mV)
Auto Points

Lead	ST(mm)	Lead	ST(mm)
I	-0.30	V1	-0.20
II	0.55	V2	0.95
III	0.25	V3	1.65
aVR	-0.40	V4	1.55
aVL	0.00	V5	1.35
aVF	0.40	V6	0.95



Muhammad Bilal,
Patient ID 11973
10/11/2022
3:44:57pm

90 bpm
145/90 mmHg

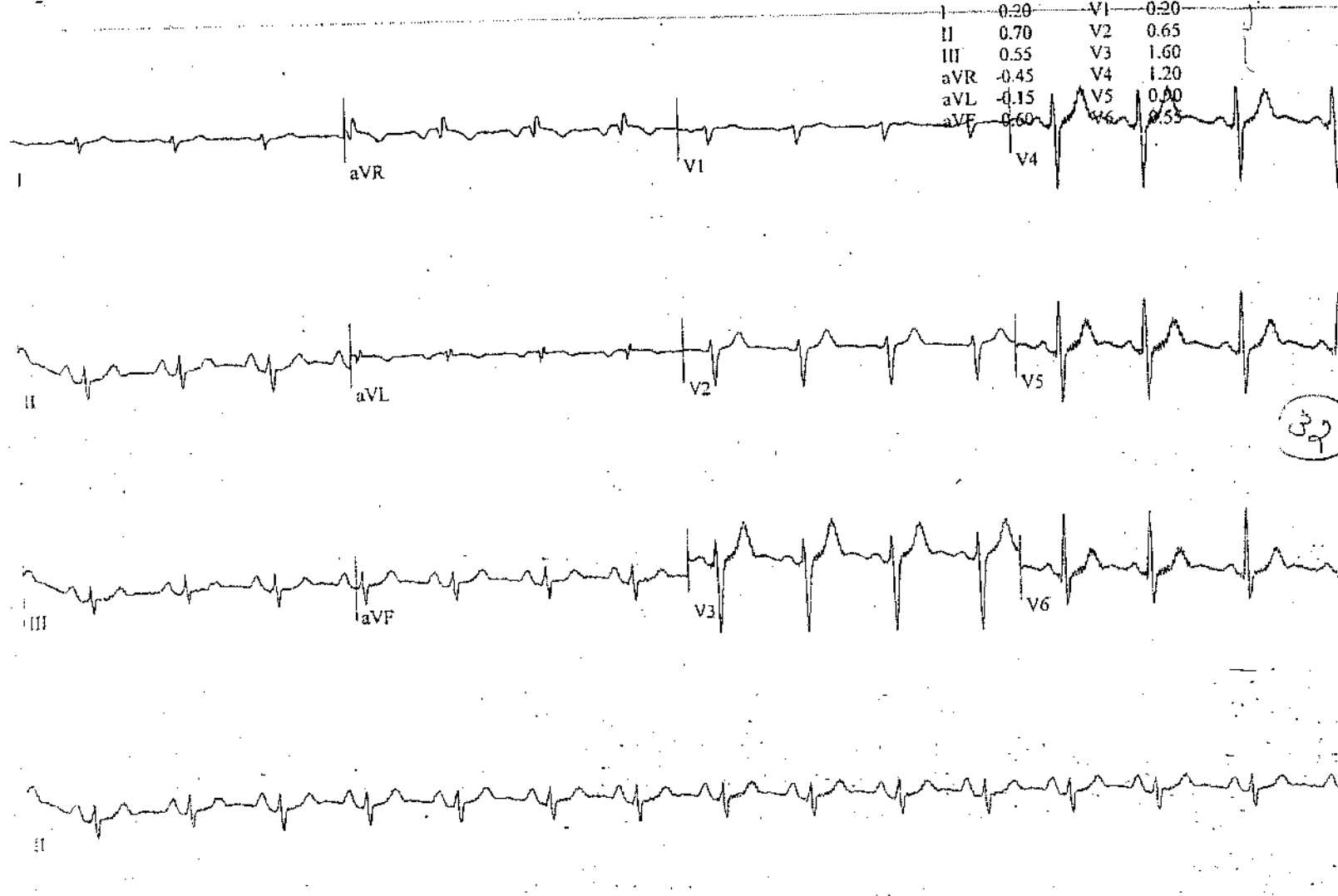
12-Lead Report
RECOVERY
#1
02:59

BRUCE
0.0 mph
0.0 %

PESHA WAR INSTITUTE OF CARDIOLOGY

Measured at 40ms Post J (10mm/mV)
Auto Points

Lead	ST(mm)	Lead	ST(mm)
I	-0.20	V1	-0.20
II	0.70	V2	0.65
III	0.55	V3	1.60
aVR	-0.45	V4	1.20
aVL	-0.15	V5	0.00
aVF	0.60	V6	0.55





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PAKISTAN INSTITUTE OF CARDIOLOGY

Phase-V, D-Block, F-7/2, Islamabad, Pakistan
+92 91 9219641 info@pic.edu.pk www.pic.edu.pk

EXERCISE TOLERANCE TEST

Patient name: Mr Muhammad Bilal	Age: 37	MRno: 11973
Referred by: Dr Shahzeb	Test Date: 11/10/2022	

Clinical Information:

Indication: Chest pain
 Risk Factor: Hypertensive.
 Current Medications: Nil
 Technique:
 Protocol: Bruce

Findings:

Resting's Heart Rate:	63bpm	Max.B.P:	160/95 mmHg
Predicted Heart Rate:	183bpm	B.P during Recovery:	145/90mmHg
Max.Heart Rate:	171bpm	Limiting Factor:	Fatigue.
Achieved:	93%	Total Exercise Time:	09:29mins
Resting B.P:	140/90mmHg		

Impression:

Resting ECG: Normal sinus rhythm.
 Peak Exercise ECG: No acute changes seen.
 Post Exercise ECG: No acute changes seen.

Conclusion:

ETT is negative for ischemia and angina.

Dr _____

ORDER

This Order will dispose of the departmental enquiry against **Senior Clerk Muhammad Bilal**, who while posted as Pay Officer in the office of Superintendent of Police, Investigation, Swabi, has been found unwilling worker and habitual absentee. He absented himself from duty w.e.f 28.03.2022 to 15.6.2022 without any leave/prior permission of the competent authority. Therefore, he was issued with charge sheet alongwith summary of allegations and SDPO Lahor was appointed as Enquiry Officer. The enquiry officer conducted proper departmental enquiry, recorded statements of all concerned, collected evidence and submitted his findings, wherein he recommended the defaulter Senior Clerk Muhammad Bilal for suitable punishment.

The undersigned has gone through the enquiry papers and findings of the enquiry officer and by agreeing with the recommendations of the enquiry officer issued Final Show Cause Notice to the defaulter. The defaulter Senior Clerk Muhammad Bilal submitted his reply to the Final Show Cause Notice, which was perused and he was heard in Orderly Room but his reply was found un-satisfactory.

Therefore, I, **Muhammad Shoaib Khan, PSP**, District Police Officer, Swabi, in exercise of the powers vested in me under Khyber Pakhtunkhwa Civil Servants (E&D) Rules 2011, hereby award **Senior Clerk Muhammad Bilal**, Major Punishment of Reduction to a lower post from Senior Clerk to Junior Clerk with immediate effect. The pay for the period of his absence is hereby deducted from his salary.

O.B No. 588

Dated 15/06/2022.


MUHAMMAD SHOAIB KHAN (PSP)
DISTRICT POLICE OFFICER,
SWABI

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI

No. 3586-90/PA, dated Swabi, the 16/06/2022.

Copies to the:-

1. Regional Police Officer Mardan.
2. SP Investigation Swabi.
3. Establishment Clerk.
4. Pay Officer Swabi.
5. Official concerned.

Demotion (Major Punishment) by DPO Swabi

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ORDER

This Order will dispose of the departmental enquiry against **Senior Clerk Muhammad Bilal**, who while posted as Pay Officer in the office of Superintendent of Police, Investigation, Swabi, has been found unwilling worker and habitual absentee. He absented himself from duty w.e.f 28.03.2002 to 15.6.2022 without any leave/prior permission of the competent authority. Therefore, he was issued with charge sheet alongwith summary of allegations and SDPO Lahor was appointed as Enquiry Officer. The enquiry officer conducted proper departmental enquiry, recorded statements of all concerned, collected evidence and submitted his findings, wherein he recommended the defaulter Senior Clerk Muhammad Bilal for suitable punishment.

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Therefore, I, **Muhammad Shoaib Khan, PSP**, District Police Officer, Swabi, in exercise of the powers vested in me under Khyber Pakhtunkhwa Civil Servants (E&D) Rules 2011, hereby award Senior Clerk Muhammad Bilal, Major Punishment of Reduction to a lower post from Senior Clerk to Junior Clerk with immediate effect. The pay for the period of his absence is hereby deducted from his salary.

OB No. 588

Dated 15/06/2022.

MUHAMMAD SHOAIB KHAN (PSP)

DISTRICT POLICE OFFICER,
SWABI

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI.

No. 3586-90/PA, dated Swabi, the 16/06/2022.

Copies to the: -

1. Regional Police Officer Mardan.
2. SP Investigation Swabi.
3. Establishment Clerk.
4. Pay Officer, Swabi
5. Official concerned.

FINAL SHOW CAUSE NOTICE

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"E"


I, Najmul Hasnain Liaquat, District Police Officer, Swabi as competent authority under Civil Servants (E&D) Rules 2011, hereby serves upon you, Junior Clerk Muhammad Bilal as follow:

1. While posted at investigation wing Swabi, you absented yourself from duty w.e.f. 02.12.2022 to 05.06.2023 without any leave/prior permission of competent authority. You also switched off your cell phone so that you cannot be contacted. You are habitual absentee and do not take interest in your official duties. You have been transferred to District Mohmand by Regional Police Officer Mardan vide his office Endst: No. 342-44/ES dated 19.01.2023, but you did not report.
2. The above commission/omission falls under the purview of mis-conduct and is punishable under Civil Servants (E&D) Rules 2011.

In this connection you were charge sheeted and served with summary of allegations and DSP HQrs Swabi was appointed to conduct proper departmental enquiry. The enquiry officer held enquiry, collected evidence, recorded statements of all concerned and submitted his findings, wherein he recommended you Junior Clerk Muhammad Bilal, for Suitable Punishment.

You are hereby directed to show cause of your irresponsible acts towards performing your professional responsibilities within 07 days, as to why you should not be punished in light of under Civil Servants (E&D) Rules 2011.

In case of none submission of your reply within 07 days of its delivery in the normal course of circumstances, it shall be presumed that you have nothing to offer in defence and ex-parte action shall be taken against you.


NAJMUL HASNAIN LIAQUAT (PSP)
DISTRICT POLICE OFFICER
SWABI

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OFFICE OF THE
DISTRICT POLICE OFFICER SWABI
PHONE# 0938-920050 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

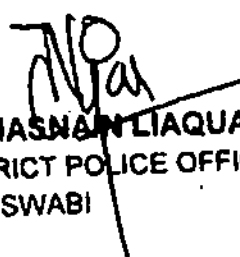
CHARGE SHEET UNDER CIVIL SERVANTS (E&D) RULES 2011

Whereas I am satisfied that formal enquiry as contemplated by Civil Servants (E&D) Rules 2011 is necessary and expedient.

And whereas I am of the view that the allegations if established would call for Major/Minor penalty as defined in Rules 4 (b) a & b of the aforesaid Rules.

Now therefore as required by Rules 6(1) of the aforesaid Rules I Najmul Hasnain Liaquat, PSP, District Police Officer Swabi charge you Junior Clerk Muhammad Bilal, on the basis of statement of allegations attached to this charge sheet.

In case your reply is not received within seven days without sufficient cause it will be presumed that you have no defence to offer and ex parte action will be taken against you.


NAJMUL HASNAIN LIAQUAT (PSP)
DISTRICT POLICE OFFICER,
SWABI

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OFFICE OF THE
DISTRICT POLICE OFFICER SWABI
PHONE# 0938-920050 FAX 0938-920054
EMAIL: dpo_swabi@yahoo.com

CHARGE SHEET UNDER CIVIL SERVANTS (E&D) RULES 2011

Whereas I am satisfied that formal enquiry as contemplated by Civil Servants (E&D) Rules 2011 is necessary and expedient.

And whereas I am of the view that the allegations if established would call for Major/Minor penalty as defined in Rules 4 (b) a & b of the aforesaid Rules.

Now therefore as required by Rules 6(1) of the aforesaid Rules I Najmul Hasnain Liaquat, PSP, District Police Officer Swabi charge you Junior Clerk Muhammad Bilal, on the basis of statement of allegations attached to this charge sheet.

In case your reply is not received within seven days without sufficient cause it will be presumed that you have no defence to offer and exparte action will be taken against you.

NAJMUL HASNAIN LIAQUAT (PSP)
DISTRICT POLICE OFFICER
SWABI

DISTRICT POLICE OFFICER SWABI
PHONE# 0938-920050 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

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SUMMARY OF ALLEGATIONS

I, Najmul Hasnain Liaquat, District Police Officer Swabi as competent authority am of the opinion that Junior Clerk Muhammad Bilal has rendered himself liable to be proceeded against as he has committed the following acts/omission within the meaning of Civil Servants (E&D) Rules 2011

1. He while posted at investigation wing Swabi absented himself from duty on 02/12/2022 till date without any leave/prior permission of competent authority. He also switched off his cell phone so that he cannot be contacted. He is habitual absentee and does not take interest in his official duties. He has been transferred to District Mohmand by Regional Police Officer Mardan vide his office Endst. No 342-44/ES dated 19/01/2023 but he did not report.
2. Above commission/omission falls under the purview of mis-conduct and is punishable under Rules Civil Servants (E&D) Rules 2011

For the purpose of scrutinizing the conduct of the said officer Mr. Nasir ul Amin DSP HQ/15 is hereby deputed to conduct proper departmental enquiry against the aforesaid official, as contained in section 5 (1) (a) of the afore mentioned rules. The enquiry officer after completing all proceedings shall submit his verdict to this office within (7) days. Junior Clerk Muhammad Bilal is directed to appear before the enquiry officer on the date, time and place fixed by the later (enquiry officer). A statement of charge sheet is attached herewith.


NAJMUL HASNAIN LIAQUAT (PSP)
DISTRICT POLICE OFFICER
SWABI

No. 30 /CC/PA

Dated 15/03 /2023

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OFFICE OF THE
DISTRICT POLICE OFFICER SWABI
PHONE# 0938-920050 FAX# 0938-920054
EMAIL: dpo_swabi@yahoo.com

SUMMARY OF ALLEGATIONS

1, Najmul Hasnain Liaquat, District Police Officer, Swabi as competent authority am of the opinion that Junior Clerk Muhammad Bilal has rendered himself liable to be proceeded against as he has committed the following acts/omission within the meaning of Civil Servants (E&D) Rules 2011.

1. He while posted at investigation wing Swabi absented himself from duty wef 02 12 2022 till date without any leave/prior permission of competent authority He also switched off his cell phone so that he cannot be contacted. He is habitual absentee and does not take interest in his official duties. He has been transferred to District Mohmand by Regional Police Officer Mardan vide his office Endst. No. 342-44/ES dated 19.01 2023 but he did not report
2. Above comission/omission falls under the purview of mis-conduct and is punishable under Rules Civil Servants (E&D) Rules 2011.

For the purpose of scrutinizing the conduct of the said official Noor ul Amin DSP HQrs is hereby deputed to conduct proper departmental enquiry against the aforesaid official, as contained in section 6 (1) (a) of the afore mentioned rules. The enquiry officer after completing all proceedings shall submit his verdict to this office within (7) days, Junior Clerk Muhammad Bilal is directed to appear before the enquiry officer on the date, time and place fixed by the later (enquiry officer). A statement of charge sheet is attached herewith.

NAJMUL HASNAN LIAQUAT (PSP)
DISTRICT POLICE OFFICER
SWABI

No. 30 /CC/PA

Dated 15/03/2023

12 minutes work by DPO Swabi

(38) "F"



OFFICE OF THE
DISTRICT POLICE OFFICER, SWABI
PHONE# 0938-320080/FAX# 0938-9-3054
EMAIL: dpo_swabi@yahoo.com

No. 4427-33PA

Dated: 18/08/2023

ORDER

This order is aimed to dispose off the departmental proceeding conducted against Junior Clerk Muhammad Bilal of this district under the Khyber Pakhtunkhwa, Civil Servants (E&D) Rules 2011 vide this office No 30/CC/PA date 15.03.2023 on the following allegations.

While posted at investigation wing Swabi, he absented himself from duty on 02.12.2022, 05.06.2023 and 05.06.2023 till date without any leave/prior permission of competent authority. He also switched off his cell phone so that he cannot be contacted. He is habitual absentee and does not take interest in his official duties. He has been transferred to district Mohmand by Regional Police Office Mardan vide his office Endst. No. 342-44/ES dated 19.01.2023 but he did not report to former Regional Police Officer, Mardan placed him under suspension and directed the undersigned to initiate departmental proceedings against him vide his office endst. No 1411/20ES, dated 08.03.2023.

He was issued charge sheet on the said allegations and enquiry proceedings were entrusted to DSP HQrs Swabi under Police Rules 197 and 198-2014. The Enquiry Officer conducted departmental enquiry, collected evidence, recorded statements of all concerned and submitted his finding wherein he found Junior Clerk Muhammad Bilal guilty for the mis-conduct and recommended him for suitable punishment. The undersigned thoroughly perused the findings of the Enquiry Officer. Therefore, he was served with Final Show Cause Notice at his home address through DPO Mardan on 14.07.2023. He was clearly directed vide para No 02 of the Final Show Cause Notice to submit his reply within 07 days of its delivery. It will be presumed that he has no defence to offer and ex-parte action will be taken against him. He was due to respond by 21.07.2023 but even after a month he has not responded that he has nothing to offer in his defence and deserves the punishment.

Signature of the Enquiry Officer and District Police Officer Swabi

OFFICE OF THE
DISTRICT POLICE OFFICER, SWABI
PHONE # 0938-920080, FAX # 0938-920054
EMAIL: dpo_swabi@yahoo.com

No. 4429-33/PA

Dated 18/08/2023

ORDER

This order is aimed to dispose-off the departmental proceedings conducted against Junior Clerk Muhammad Bilal of this district under the Khyber Pakhtunkhwa Civil Servicing (E&D) Rules 2011, vide this office No. 30/CC/PA dated 15.03.2023 on the following allegations.

While posted at Investigation wing Swabi, he absented himself from duties w.e.f. 02.12.2022, 05.08.2023 and 05.06.2023 till date without any leave / prior permission of competent authority. He also switched off his cell phone so that he cannot be contacted. He is habitual absentee and does not take interest in his duties. He has been transferred to district Mohmand by Regional Police Officer Mardan vide his office Endst: No. 342-44/ES dated 19.01.2023 but he did not report. Therefore, Regional Police Officer Mardan placed him under suspension and directed the undersigned to initiate departmental proceedings against him vide his office endst: NO. 1412-20/ES dated 08.03.2023.

He was issued charge sheet on the said allegations and enquiry proceedings were entrusted to DSP HQrs Swabi under Police Rules 1971 amended 2014. The Enquiry Officer conducted departmental enquiry collected evidence recorded statements of all concerned and submitted his findings wherein he found Junior Clerk Muhammad Bilal guilty for the mis-conduct and recommended him for suitable punishment. The undersigned thoroughly perused the findings of the address through DPO Mardan on 14.07.2023. He was clearly directed vide para no. 5 of the Final Show Cause Notice to submit his reply within 07 days of its delivery otherwise it will be presumed that he has no defense to offer and exparte action will be taken against him. He was due to responde by 21.07.2023 but even after a month he did not which reasons that he has nothing to offer in his defence and deserves exparte action.

.....
.....

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In view of situation painted above, in exercise of powers vested in me
assigned to, Najmul Hasnain Liaquat, PSP District Police Officer, Swabi hereby
award Junior Clerk Muhammad Bilal Major Punishment of Dismissal from
Service from the date of absence i.e. 02.12.2022.

Order Announced

OB No. 962

Dated: 12/08/2023

NAJMUL HASNAIN LIAQUAT, (PSP)
DISTRICT POLICE OFFICER
SWABI

OFFICE OF THE DISTRICT POLICE OFFICER, SWABI

Copies to the:

1. Regional Police Officer Mardan, w/r to his office order No. 1418-20/ES, dated 08/03/2023
2. Superintendent of Police, Investigation, Swabi
3. Pay Officer
4. Establishment Clerk
5. I/C PAL

E.C.
11/8

[Handwritten signature]
SP/MS Swabi
21/8

14/08/2023
22/08/23

BETTER COPY

39

In view of situation painted above in exercise of powers vested upon undersigned I, Najmul Hasnain Liaquat PSP District Police Officer Swabi hereby award Junior Clerk Muhammad Bilal Major punishment of " Dismissal From Service" from the date of absence i.e. 02.12.2022.

Order Announced

OB No. 962

Dated 18.08.2023

Najmul Hasnain Liaquat (PSP)
District Police officer
Swabi

Office of the District Police Officer, Swabi.

Copies to the:

1. Regional Police Officer Mardan w/r to his office endst No.1418-20/Es dated 08.03.2023.
2. Superintendent of Police, investigation Swabi.
3. Pay Officer
4. Establishment Clerk
5. I/C PAL

The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

39-A

Subject: APPEAL AGAINST DISMISSAL ORDER

R.No.

With due respect, it is submitted that I was enlisted as Constable in 2006 and later on absorbed as Junior Clerk posted in June 2009 and later on got promotion to the rank of Senior Clerk on my own turn. On promotion I was transferred and posted in Investigation Wing, Swabi. I performed my duty with great zeal and zest and entire satisfaction of my senior officers. I know my work very well and well aware from my job which is quite clear from my office record ACRs and show excellent performance.

Unfortunately I was severely suffered from anxiety, depression as well as HTN/Blood Pressure patient. Due to Heart attacked I was Hospitalized for many times and my Doctors advised me for complete bed rest. Medical report/documents attached for ready reference.

It is submitted that I am of HTN/Blood Pressure (Heart) patient since long and am still under treatment/observation of the Doctor. I am having 15 years of excellent service. In my 15 years service, I was never awarded even a single warning. My efficiency, performance and discipline can be judged from my previous record/ACRs awarded to me by various officers.

During the treatment I was transferred to District Mohmand by the RPO Mardan vide his office Endst: No. 324-4/1/ES, dated 19.01.2023 but due to my worse condition of illness, I could not report my arrival at District Mohmand and absented me from the duty with effect from 02.12.2022 to 05.06.2023.

The RPO Mardan placed me under suspension vide Endst: No. 1418-20/ES, dated 08.03.2023 and the DPO Swabi was directed to initiate proper departmental proceedings against the undersigned vide Endst: No.1412-20/ES, dated 08.03.2023 and DSP HQrs: Swabi was nominated as enquiry officer, on the recommendation of enquiry officer awarded me major punishment of "Dismissal from Service" vide OB No. 962, dated 18.08.2023.

Later on I was preferred an appeal to the RPO/Mardan Region but unfortunately my appeal was rejected and filed by the RPO/Mardan vide his office Order Endst: No. 7789/ES, dated 28.11.2023 (copy enclosed).

It is solemnly submitted that my above version is based on facts.

Keeping in view my above submission/affirmation and my illness i.e. Blood Pressure as well as my excellent performance/record, it is therefore, humbly prayed that the impugned order of "Dismissal from Service" may very graciously be set aside and the petitioner may kindly be restored against his original rank of Senior Clerk along with consequential benefits.

Dated: 20.12.2023.

Yours faithfully,

Bilal
(MUIHAMMAD BILAL)
Ex-Junior Clerk
Mobile No. 0302-1933000

To: The Inspector General of Police.
Khyber Pakhtunkhwa Peshawar

Subject: APPEAL AGAINST DISMISSAL ORDER.

With due respect, it is submitted that I was enlisted as Constable in 2006 and later on absorbed as Junior Clerk posted in June 2009 and later on got promotion to the rank of Senior Clerk on my own turn. On promotion I was transferred and posted in Investigation Wing Swabi. I performed my duty with great zeal and zest and entire satisfaction of my senior officer. I know my work very well and well aware from my job which is quit clear from my office record, ACRs and show excellent performance.

Unfortunately, I was severely suffered from anxiety, depression as well as HTN/ Blood Pressure patient. Due to Heart attacked I was Hospitalized for many times and my Doctors advised me for complete bed rest. Medical report/ documents attached for ready reference.

It is submitted that I am of HTN/ Blood Pressure (Heart) patient since long and am still under treatment/ observation of the Doctor. I am having 15 years of excellent service. In my 15 years service, I was never awarded even a single warning. My efficiency, performance and discipline can be judged from my previous record/ ACR awarded to me by various officers.

During the treatment I was transferred to District Mohmand by the RPO Mardan vide his office Endst: No. 324-44/ES, dated 19.01.2023 but due to my worse condition of illness. I could not report my arrival at District Mohmand and absented me from the duty with effect from 02.12.2022 to 05.06.2023.

The RPO Mardan placed me under suspension vide Endst: NO. 1418-20/ES, dated 08.03.2023 and the DPO Swaib was directed to initiate proper departmental proceedings against the undersigned vide Ends: No. 1412-20/ES dated 08.03.2023 and DSP HQrs: Swabi was nominated as enquiry officer on the recommendation of enquiry officer awarded me major punishment of "Dismissal from service" vide OB No. 962 dated 18.08.2023.

Later on I was preferred an appeal to the RPO/ Mardan Region but unfortunately my appeal was rejected and filed by the RPO/ Mardan vide his office order Endst: No. 7789/ES, dated 28.11.2023. (copy enclosed).

It is solemnly submitted that my above version is based on facts.

Keeping in view my above submission/ affirmation and my illness i.e. Blood Pressure as well as my excellent performance/ record of "Dismissal from Service" may very graciously be set aside and the petitioner may kindly be restored against his original rank of Senior Clerk alongwith consequential benefits.

Dated: 20.12.2023
Your faithfully,

-sd-
(MUHAMMAD BILAL)
Ex-Junior Clerk
Mobile No. 0302-1933000

To: Regional Police Officer,
Mardan

Subject: APPEAL AGAINST DISMISSAL ORDER:

39-B

Respected Sir,

With due respect, I would like to submit the following:

I was initially enlisted as a Constable in 2006 and subsequently absorbed as a Junior Clerk in Jun 2009. Later, I earned a promotion to the rank of Senior Clerk based on my own merit. Upon promotion, I was transferred and assigned to the Investigation Wing in Swabi. During my tenure, I carried out my duties diligently, garnering the satisfaction of my senior officers. My work performance is well documented in my office records, including Annual Confidential Reports (ACRs) that consistently reflect my excellent performance.

Regrettably, I have been facing severe health challenges, including anxiety, depression, and hypertension (high blood pressure). I have had multiple hospitalizations due to heart attacks, and my medical professionals have advised me to undergo complete bed rest. Attached to this submission are my medical reports and documents for your reference.

Initially, an inquiry was initiated against me for taking leaves without permission during my hospitalizations, despite my medical condition. After the inquiry, I was demoted to the rank of Junior Clerk and subsequently transferred to District Mohmand by the Regional Police Officer (RPO) Mardan as per his office Endst. No. 324-44/ES, dated 19.01.2023. Unfortunately, my deteriorating health prevented me from reporting to duty in District Mohmand, leading to my absence from December 2022 to June 5, 2023.

In response, the Regional Police Officer Mardan placed me under suspension, and the District Police Officer (DPO) Swabi was instructed to initiate proper departmental proceedings against me, as per Endst. No. 1412-20/ES, dated 08.03.2023. An enquiry officer, DSP HQrs: Swabi, was appointed to oversee the proceedings, which ultimately resulted in my dismissal from service.

I wish to emphasize that I have been a longstanding patient of hypertension and heart-related issues and continue to be under the care and observation of a medical professional. Throughout my 15 years of service, I have maintained an exemplary record, never having received even a single warning. My efficiency, performance, and discipline can be attested to by the ACRs submitted by various officers during my tenure.

I solemnly assert that the account presented here is based on factual circumstances. In light of my submissions, my ongoing health condition, and my commendable service record, I humbly request that the order of dismissal from service be reconsidered and that I be reinstated in my position with all associated benefits, please.



Muhammad Bilal
Ex-Junior Clerk
Mobile No. 03021933000

To:

Regional Police Officer,
Mardan

Subject: APPEAL AGAINST DISMISSAL ORDER.

With due respect, I would like to submit the following:

I was initially enlisted as Constable in 2006 and subsequently absorbed as Junior Clerk in June 2009. I earned promotion to the rank of Senior Clerk on my own merit. Upon promotion I was transferred and assigned to the Investigation Wing in Swabi. During my tenure I earned out my duties diligently, garnering the satisfaction of my senior officers. My work performance is well documented in my office record, including Annual Confidential Reports (ACRs) that consistently refer my excellent performance.

Regrettably, I have been facing severe health challenges, including anxiety, depression, an hypertension (high blood pressure), I have had multiple hospitalizations due to heart attacks and my medical professionals have advised me to undergo complete bed rest. Attached to this submissions and my excellent performance.

Initially, an inquiry was initiated against me for taking leaves without permission during my hospitalizations, despite my medical condition. After the inquiry, I was demoted to the rank of Junior Clerk and subsequently transferred to District Mohmand by the Regional Police Officer (RPO) Mardan as per his office Endst: 324-44/ES dated 19.01.2023. Unfortunately my deteriorating heart prevented me from reporting to duty in District Mohmand leading to my absence from December 2022 to June 5, 2023.

In response, the Regional Police Officer Mardan placed me under suspension and the District Police Officer (DPO) Swabi was instructed to initiate proper departmental proceedings against me as per Endst: No. 1412/ES, dated 08.03.2023. An enquiry officer, DSP HQrs: Swabi was appointed to oversee the proceedings which ultimately resulted in my dismissal from service.

I wish to emphasize that I have been a longstanding patient of hypertension and heart related issue and continue to be under the care and observation of a medical professional. Throughout my 15 years of service I have maintained an exemplary record never having received even a single warning. My efficiency performance and discipline can be attested to by the ACRS submitted by various officer during my tenure.

I solemnly assert that the account presented here is based on factual circumstances. In light of my submissions my ongoing health condition and my commendable service record I humbly request the order of dismissal from service be reconsidered and that I be reinstated in my position with an associated benefits, please.

-sd-

(MUHAMMAD BILAL)

Ex-Junior Clerk

Mobile No. 03021933000

(40) "G"

ORDER.

This order will dispose-off the departmental appeal preferred by Ex-Junior Clerk Muhammad Bilal of DPO Office, Swabi against the order of the then District Police Officer, Swabi, whereby he was awarded Major punishment of dismissal from service vide OB: No. 962 dated 18.08.2023. The appellant was proceeded against departmentally on the allegations that he while posted at Investigation Wing Swabi absented himself from his lawful duty with effect from 07.12.2022, 05.06.2023 and 05.06.2023 till date of his dismissal without any leave or prior permission of the authority. He also switched off his cell phone so that he cannot be contacted. He was habitual absentee and does not take interest in his official duties. He has been transferred to District Mohmand by the then Regional Police Officer Mardan vide this office endorsement No. 342-44/ES, dated 07.07.2023, but he did not report. Therefore, the delinquent Official was placed under suspension and directed to the then District Police Officer, Swabi to initiate departmental proceedings against him vide this office endorsement No. 1412-20/ES, dated 08.03.2023.

Proper departmental enquiry proceedings were initiated against him and the then Deputy Superintendent of Police, Headquarters, Swabi was nominated to conduct enquiry into the matter. The Enquiry Officer after fulfillment of all legal and procedural formalities, submitted his findings to the then District Police Officer, Swabi, wherein he found the delinquent Official guilty for the misconduct and recommended him for suitable punishment.

The then District Police Officer, Swabi perused the findings and by concurring with the recommendations of enquiry Officer, issued him Final Show Cause Notice. The Final Show Cause Notice was served at his home address through District Police Officer, Mardan on 14.07.2023. He was clearly directed in Final Show Cause Notice to submit his reply within seven days but failed to submit his reply within stipulated period, rather remained absent, which means that he was no more interested in Police Job.

Keeping in view the recommendation of enquiry officer and other material available on record, the appellant was awarded Major Punishment of dismissal from service vide OB: No. 962 dated 18.08.2023 by the then District Police Officer, Swabi.

RPO Appeal against termination

41

Feeling aggrieved from the order of the then District Police Officer, Swabi, the appellant preferred the instant appeal. He was summoned and heard in person in orderly room held in this office on 15.11.2023.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt. As he has bitterly failed to produce any cogent reason to justify his absence because the same clearly depicts his casual and lethargic attitude towards his official duties. On perusal of previous service record of the appellant, it was noticed that he is habitual absentee and prior to this, the appellant was also awarded major punishment of reduction in rank from Senior Clerk to Junior Clerk for his disinterest in the official duties. Hence, order passed by the competent authority does not warrant any interference.

Keeping in view the above, I, Muhammad Suleman, PSP, Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit.

Order Announced.

(MUHAMMAD SULEMAN) PSP
Regional Police Officer,
Mardan

No. 1181 JES, Dated Mardan the 28/11/2023.

Copy forwarded to District Police Officer, Swabi, for information and necessary action w/r to his office Memo: No. 106/Legal dated 16.10.2023. His Service Record is returned herewith.

(*****)



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

"H"

42

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 17 of Khyt Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 submitted by Ex-Junior Cle Muhammad Bilal (hereinafter referred to as petitioner).

The Petitioner was awarded major punishment of dismissal from service vide OB No. 96 dated 18.08.2023 on the allegations that he while posted at Investigation wing Swabi absented himself from his lawful duty w.e.f 02.12.2022 to 05.06.2023 and to till date of his dismissal without any leave permission of the authority. Besides, he switched off his cell phone so that he cannot be contacted. He w habitual absentee and does not take interest in his official duties. Meanwhile, he was transferred to Distri Mohmand by RPO Mardan vide region office Endst: No. 342-44/ES, dated 19.01.2023 but he did not repe his arrival.

A meeting of Appellate Board was held on 05.03.2024 in CPO under the chairmanship of DIG Headquarters. Ex-Junior Clerk Muhammad Bilal was present and heard in detail.

He remained absent from his duties for more than six months without any permission/seekin leave. Therefore, his appeal is being rejected.

Sd/-

AWAL KHAN, PSP

Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. S/ 3491-95/24, dated Peshawar, the 24-04/2024.

Copy of the above is forwarded to the:

1. Regional Police Officer, Mardan.
2. District Police Officer, Swabi.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Adtl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdts: E-V and Secret Branch CPO Peshawar.

(FARIHAN KHAN) PSP, QPM
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

ADDENDUM

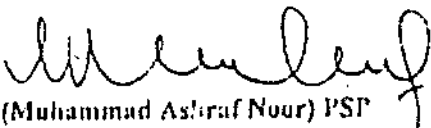
43

"I"

Dated 27/2/2017

40-4850
E.V. DISCIPLINARY ACTION. Powers of disciplinary action against Ministerial Staff were delegated to RPOs / DPOs within the meaning of Article 31 of Police Order 2002 (Now incorporated in Section 44(4) of Khyber Pakhtunkhwa Police Act, 2017) vide this Police Notification No. 8511/E-V, dated 28-12-2015. Police Policy Board approved delegation of the powers of disciplinary action against the Ministerial Staff to Addl: IGsP / DIsG, head of unit of Police and SSsP / Dy: Commandants of the unit of Police in line with the notification ibid. Therefore an addendum is issued in continuation of notification ibid and powers of disciplinary actions against the Ministerial Staff are also delegated to the authorities of units of Police as per detailed below.

DESIGNATION	ACTION IS TO BE TAKEN AGAINST THE MINISTERIAL STAFF
Addl: IGsP / DIsG, head of unit of Police	Office Supdt: (BPS-17), Stenographers (BPS-16) Assistant Grade Clerks (BPS-16), Steno Typist (BPS-14) and Senior Clerks (BPS-14)
SSsP/DY: Commandants	Junior Clerks (BPS-11) and Naib Qasid/Class-IV (BPS-1 to 4)


(Muhammad Asrar Nour) PSP
Addl: IGP/HQs:
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Encls: No. & date even.
Copy forwarded to the:-

- All Addl: Inspectors General of Police of Khyber Pakhtunkhwa.
- All RPOs of Khyber Pakhtunkhwa.
- Capital City Police Officer, Peshawar.
- All DIsG of Khyber Pakhtunkhwa.
- Commandants, FRP and PTC, Hanju.
- All DPOs of Khyber Pakhtunkhwa.
- All AlsG of Khyber Pakhtunkhwa.
- Director I.T, Khyber Pakhtunkhwa Peshawar
- Director FSL, Khyber Pakhtunkhwa Peshawar.
- Commandant CPC University Campus, Peshawar.
- Deputy Director Audit, CPO Peshawar.

Amendment in Rules
Supportive Document

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

Service Appeal No. ____/2024

Muhammad BilalAppellant

VERSUS

Inspector General of Police (IGP), Khyber Pakhtunkhwa, Peshawar
and others.

.....Respondents

I, do hereby appoint and constitute **Kakakhel Law Associates**, (Advocates and Legal Consultants), to appear and act for as my Counsel in the above matter.

1. To act, appear and plead in the above-mentioned matter and to withdraw or compromise the said matter or submit to arbitration any differences or dispute that shall arise touching or in any manner relating to the said matter and to receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said matter.
2. To draft and sign files at necessary pleadings, applications, objections, affidavits or other documents as shall be deemed necessary and advisable for the prosecution of the said matter at all its stages.
3. To employ any other Legal Practitioner, authorizing him to exercise the power as conferred on the undersigned Advocate, wherever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the above matter. I also hereby agree not to hold the Advocate or his substitute responsible for the result of the said matter in consequence of his absence from the Court when the said matter is called up for hearing. I further hereby agree that in the event for the whole or any part of the fee to be paid to the Advocate remaining unpaid, he shall be entitled to withdraw from the above matter. Received by me Dated 24th May, 2024.

ACCEPTED BY:

Saifullah Muhib Kakakhel
Advocate Supreme Court

&

Kainat Muhib Kakakhel
Advocate High Court

Muhammad Fuqan Qazi
Advocate Peshawar

Appellant

Mehwish Muhib Kakakhel
Advocate High Court
BSCS, LL.M (Cyber Crimes)

Nouman Muhib Kakakhel
Advocate High Court

Alishba Khan
Advocate Peshawar

KAKAKHEL LAW ASSOCIATES

Kakakhel Law Associates (Advocates & Legal Consultants)
36-c, 2nd Floor, Cantonment Plaza, Saddar Road, Peshawar Cantt, Khyber Pakhtunkhwa, Peshawar.
Ph: 091-5250412, Cell: 0334-4440744 Email: kakakhel@lawfirm@gmail.com