


FORM OF ORDER SHEET

Court of _____

Appeal No. 858/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/06/2024	<p>The appeal of Mr. Imran Khan presented today by Qazi Sajid ud Din Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 04.07.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Appeal No. 858/2024

Imran Khan

Appellant

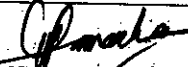
VERSUS

Inspector Gen. of Police (KPK) Peshawar etc.

Respondents

INDEX

S.No	Description of Documents	Annex	Pages
1.	Memo of appeal		1-8
2.	Copy of Dismissal Order	A	9
3.	Copy of application for provision of Reversion order,	B	10
4.	Copy of the order of reversion from the rank of Sub Inspector to the rank of ASI.	C	11
5.	Copy of Appeal made to the DIG Kohat	D	12-17
6.	Copy of the order of DIG Kohat Region Kohat	E	18
7.	Affidavit	F	19
8.	Address of the Parties	G	20
9.	Copies of medical reports	H	21-34
10.	Wakalat Nama	I	35


IMRAN KHAN (Appellant)
EX ASI No.92-K

Dated: 20-06-2024.

Through:


Qazi Sajid ud Din Advocate

THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Appeal No - 858/2024

Imran Khan Ex ASI R/o Garhi Mawaz Khan, Kohat City. (Appellant)

VERSUS

1. Inspector of Police (KPK) Peshawar.
2. Deputy Inspector of Police Kohat Region.
3. District Police Officer, Distt: Orakzai. (Respondents)

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUN KHWA
SERVICE TRIBUNAL ACT, AGAINST THE ORDER OF DISMISSAL
OF THE APPELLANT DATED 29-12-2023, ISSUED BY THE
DPO ORAKZAI RECEIVED ON 09-1-2024 AND DISMISSAL /
REJECTION OF THE APPELLATE ORDER DATED 23-5-2024
VIDE WHICH DEPARTMENTAL APPEAL WAS REJECTED BY THE
DIG KOHAT REGION KOHAT WITHOUT LAWFUL
JUSTIFICATION.

Respectfully Sheweth,

With great respect the appellant may be allowed to submit the following for your kind and sympathetic consideration;

Brief Facts of the Case:

1. That the appellant is bonafide resident of Garhi Mawaz Khan Kohat City. He belongs to a respectable family and he himself is a law abiding citizen. Moreover, appellant is educated upto Master of Arts in Mathematics.
2. That in the year 2009, the appellant was selected as PASI by the Khyber Pakhtun Khwa Public Service Commission.
3. That after assuming charge as PASI the appellant started his official performance with zeal and zest. From his official work, his senior

officers were satisfied and the appellant never provided any opportunity to any quarter to lodge complaint against the appellant.

4. That the appellant successfully completed his basic and other courses and also the upper Course in the year 2019.
5. That the appellant due to his efficiency and good work not only was awarded cash and commendation certificates but was also promoted as Sub Inspector in the year 2016.
6. That while serving in District Orakzai, infant son of the appellant developed cardiac disease and his newly born daughter developed some disease in her blood. For medical treatment both were taken on different occasions to Peshawar and Lahore. Medical treatment of son of the appellant commenced from the year 2016 which ended in September 2023, while daughter of the appellant born in 2023 inspite of hectic efforts could survive for fifteen days.
7. That before taking his son to Lahore, the appellant submitted application for leave with effect from 16-4-2023 in the office of the DPO Orakzai, on the following day the appellant proceeded to Lahore alongwith his ailing son for medical treatment.
8. That when the appellant came back after successful completion of medical treatment of his son, the appellant on the following day went to the office of the DPO Orakzai for resuming duty but the appellant was taken by surprise when he was informed that he has been dismissed from service. (Copy of dismissal order is annexed as Annexure-A)
9. That the appellant due to his own efforts obtained impugned copy of the dismissal order from service on 09-1-2024.
10. That the appellant was further surprised to know that prior to the dismissal orders on the basis of the same charge /allegation he was

awarded punishment of reduction from the rank of Sub Inspector to the Rank of ASI. The appellant applied for provision of the said order but till to date no order was made on the application submitted by the appellant. (Copy of the application is annexure-B)

11. That after prolong efforts the appellant succeeded to obtain copy of the order of reversion form the rank of Sub Inspector to the rank of ASI through his own sources when the time of departmental appeal was already expired. (Copy of the order of reversion form the rank of Sub Inspector to the rank of ASI is annexure-C)
12. That the authority concerned (DPO Orakzai) having not sensed urgency and sensitivity of the matter and instead the appellant was started to be victimized.
13. That not only son of the appellant but newly born daughter of the appellant also faced chronic disease in her blood and during treatment she expired after fifteen days of her birth. (Copies of medical reports are enclosed as annexure-H)
14. That with the grace of Allah, son of the appellant who was suffering from cardiac disease after prolong treatment since 2016 to 2023, recovered.
15. That the authority concerned was so poisoned regarding the appellant that nature and position of law was not kept in sight and in violation of the law and constitution, on the same charge i.e. absence from duty w.e.f 18-4-2023, two departmental enquires were conducted against the appellant.
16. That both the enquires were conducted at the back of the appellant. Neither charge sheets nor statements of allegations were served upon him.

17. That the appellant was not informed about the initiation of enquires through any source of communication or through personal messengers.
18. That on the charge i.e. absence from duty w.e.f 18-4-2023 department enquiry was initiated against the appellant, however; the appellant was not informed about the said enquiry. Ultimately, vide order dated 29-12-2023, the appellant was awarded punishment of dismissal from service from the date of absence.
19. That the dismissal order was not conveyed to the appellant, however; when he went to the office of the DPO Orakzai on 09-01-2024 for rejoining his duty he was informed that the appellant was dismissed from service vide order dated 29-12-2023.
20. That being aggrieved from the order the appellant moved Departmental Appeal before the DIG Kohat Region Kohat, however; vide order dated 23-5-2024, appeal was dismissed/ rejected. (Copy of order is enclosed as annexure-D and order of DIG is annexure-E)
21. That following are some of the grounds of appeal among others against the impugned order of dismissal dated 29-12-2023 received on 09-01-2024 and the impugned order of the DIG Kohat Region Kohat dated 23-5-2024.

Grounds of Appeal:-

- A. That the orders of dismissal of the appellant from service dated 29-12-2023 received on 09-01-2024 and the appellate order of the Worthy DIG Kohat Region Kohat dated 23-5-2024 vide which appeal filed by the appellant was dismissed, are against law, facts and evidence on record, hence they are liable to be set aside.

- B. That before departure of the appellant to Lahore for treatment of his ailing son, submitted application for leave to the Competent Authority but no order whatsoever was made over the said application.
- C. That the Competent Authority did not make any order on the leave application nor intimation regarding acceptance or rejection of leave application was conveyed to the appellant.
- D. That keeping in view severity, sensitivity and urgency of the sickness of his son and newly born daughter, appellant in interest of their lives, had taken them to the Lahore and Peshawar for medical treatment. However; newly born daughter of the appellant was expired on 23-5-2023.
- E. That son of the appellant namely Muhammad Bahram suffering from cardiac disease had recovered after a prolong treatment.
- F. That the Competent Authority instead of deciding fate of the leave application, opted for initiation of the departmental proceedings at the back of the appellant which resulted in punishment of reduction in Rank from the rank of Sub Inspector to the rank of ASI vide order dated 27-6-2023 and subsequently vide order dt:29-12-2023 on the basis of the same charge, appellant was dismissed from service from the date of absence.
- G. That perusal of the impugned orders will indicate that neither charge sheets nor the statements of allegations coupled with the Final Show Cause Notices were served upon the appellant.
- H. That before initiating departmental enquiry service of charge sheet and statement of allegation is mandatory. If the Competent Authority fails to serve the same, entire enquiry becomes illegal ab-intio and vitiates the entire proceedings. Thus in view of the matter, both the enquires and punishment orders are not sustainable in the eyes of law.

- I. That if at all, it was desired to proceed against the appellant and there was no likelihood of joining enquiry proceedings by the appellant, in that case option of ex-parte proceedings could be exercised. However; record shows that option of ex-parte proceedings was not exercised. Hence the enquires held against the appellant have lost their legal value and no action on the basis of such one sided enquires can be taken against appellant.
- J. That though complete home address and mobile number of the appellant were available to the Competent Authority i.e. DPO Orakzai but neither the inquiry officer nor the DPO Orakzai considered it appropriate to serve the charge sheets and the statements of allegations coupled with the Final Show Cause Notice at his home address and initiated enquires at the back of the appellant and the appellant was not associated with the said enquires and thus legal requirement was also completely ignored having made the enquires unlawful on one hand and questionable on the other.
- K. That by awarding two punishments on the same charges Art.13 of the Constitution of Pakistan has been violated. Thus both the orders of reduction from the rank of SI to the Rank of ASI and dismissal order of the appellant are unconstitutional and thus both the impugned orders are not operative on the rights of the appellant and require to be set aside.
- L. That the impugned punishment order of dismissal from service dated 29-12-2023 indicates that the Competent Authority has made the order operative from retrospective effect i.e. from the date of absence (18-4-2023) Under Art. 12 of Constitution of Pakistan no punishment can be awarded from the retrospective effect. Thus punishment of dismissal from service with retrospective effect instead of with immediate effect has made the order unconstitutional thus the

impugned punishment order cannot be pressed in service and is liable to be set aside at this score alone.

- M. That the appellant is not a habitual absentee. Appellant due to emergency to his kids as submitted above was forced to temporarily abstain from service for their medical treatment as no elder male person was available at his home for looking after family of the appellant.
- N. That during service the appellant has neither faced any enquiry nor was awarded any minor or major punishment, which is sufficient proof that from the date of his induction in the Police Deptt: till 18-4-2023 he was punctual however, due to sickness of his son and daughter he was forced to keep himself away from duty only to the extent of need / requirement.
- O. That the punishment awarded to the appellant is not only unlawful but also harsh and does not satisfy the ends of justice.
- P. That under Article 10 A of the Constitution, it is fundamental right of the appellant that he should be given fair, independent and transparent trial / enquiry. Since in the case of the appellant fair independent and transparent enquiry was denied by the authority, hence all the impugned orders are repugnant to law and thus ultra vires of the constitution.
- Q. That the departmental appeal filed before the DIG Kohat Region Kohat was not time barred, because on the impugned dismissal order it has been clearly mentioned that the appellant received the said order on 09-01-2024 and filed appeal in the office of the DIG Kohat on 07-02-2024 meaning thereby that the said appeal was instituted two days before the expiry of limitation period. Hence contention of the DIG Kohat that appeal is time barred by eight days is incorrect and is not


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supported by documentary evidence. Contention of the DIG Kohat therefore, deserves to be brushed aside.

R. That any other ground will be taken with the permission of the Hon'able Tribunal at the time of arguments.

Prayer:

It is therefore, prayed that by accepting the instant appeal the order of dismissal of the appellant dated 29-12-2023 received on 09-01-2024 and impugned order of the DIG Kohat dt:23-5-2024 being one sided, unilateral, illegal ab-initio, fanciful, flimsy and based on presumptions and conjectures may kindly be set aside and the appellant may please be reinstated in service from the date of dismissal with all back benefits. Any other relief which the Hon'able Tribunal consider it appropriate may also please be given to the appellant.


IMRAN KHAN (Appellant)
EX/ASI No.92-K

Dated: 20-06-2024.

Through:


Qazi Sajid ud Din Advocate



**OFFICE OF THE DISTRICT POLICE OFFICER
ORAKZAI**

Annex A (9)

ORDER

This order of mine will dispose off the departmental enquiry conducted against ASI Imran Khan No. 92/K under the Khyber Pakhtunkhwa, Police Rules, 1975 (Amended 2014).

ASI Imran Khan No. 92/K was absented from his lawful duties since 18.04.2023. In order to initiate proper departmental enquiry, charge sheet coupled with statement of allegations vide this office No. 1450/EC dated 27.09.2023 and SP Investigation Orakzai was appointed as Inquiry Officer to probe into the matter. During the course of departmental enquiry, the enquiry officer called him time & again but he did not attended the office of enquiry officer deliberately.

The enquiry officer submitted on his findings report that he has deliberately and without any cogent reason absented himself from his lawful duty and no more interested on official duty. Therefore, he is guilty of the charges level against him and the allegations are proved beyond shadow of any doubt and recommended him for major punishment.

On the perusal of the finding report and other connected documents, the defaulter ASI was issued with a Final Show Cause Notice vide this office No. 1846/EC (Enq) dated 16.11.2023 but he did not submitted the reply of the same deliberately. Therefore, he was called in orderly room time & again to hear in person but he did not ensure his presence in orderly room.

Therefore, keeping in view the recommendation of the enquiry officer charged proved levelled against him and evidence on the record, I **Salah ud Din Khan, District Police Officer, Orakzai** (the competent authority) in exercise of powers vested to the undersigned under police Rules-1975 (amended in 2014), awarded him a Major Punishment of **dismissed from Service** the defaulter ASI Imran Khan No. 92/K from police service from the date of absence.

OB No: 888

Dated: 29/12/2023

DISTRICT POLICE OFFICER, ORAKZAI

Copy of above to the:-

1. The Regional Police Officer, Kohat.
2. The District Accounts Officer, Orakzai
3. Pay Officer/SRC/OHC/Reader/In charge Kot/In charge Good own for necessary action.

DISTRICT POLICE OFFICER, ORAKZAI

Received Order Copy
of Dismissal today
on 09/01/2024.

Signature
ex. ASI Imran Khan

QAZI SAJID-UD-DIN
MA (Pol. Sc) LLB
(Retd) SSP
Advocate Kohat

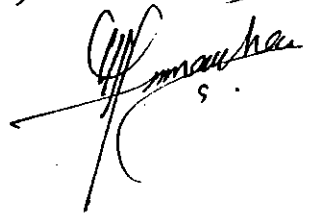
Attested

درخواست نمبر 387 مورخہ 27-06-2023

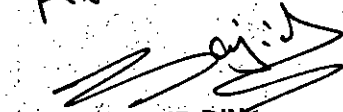
جناب عالی! -
تعداد میں سے کچھ مسائل کے علم میں یہ بات حال
میں ہے کہ آئی ہے کہ بحوالہ اوپر 387 مورخہ 27-06-23
سے انسپکٹر کے عہدے سے تین ہی کے لیے ASI
عہدے پر رکھنے کا حکم کیا گیا ہے
میں مسائل کے حکم مندرجہ کے خلاف اپیل کرنے کے لیے
نقل حکم مندرجہ بالا کی ضرورت ہے جو کہ میں مسائل
کو حل کرنے کے لیے عطا کیا جائے گا حکم صادر فرمائیں

مورخہ 09-01-24

عمران خان ولد حکیم خان
نمبر 10 (10) صوازیات قلعہ ڈیرہ



Attested



QAZI SAJID UD-DIN
MA (Pol. Sc) LLB
(Retd) SSF
Advocate Kohat

**OFFICE OF THE DISTRICT POLICE OFFICER
ORAKZAI**

ORDER:-

This order will dispose off the departmental proceedings against Sub Inspector Imran Khan 92/K while he was posted as Reader to undersigned. He was absented from his lawful duties since 18.04.2023 without any leave or prior permission by the competent authority. His above act is against the disciplined force and amount to gross misconduct on their part, which is liable to be severely dealt under police disciplinary rules-1975 for major punishment.

Charge Sheet/Statement of allegation under police disciplinary rules 1975 amended 2014 was issued to him. Inspector Abdul Saeed CIO Orakzai was appointed as enquiry officer into the matter. After completion of enquiry, enquiry officer held him guilty of the charge level against him and recommended for major punishment.

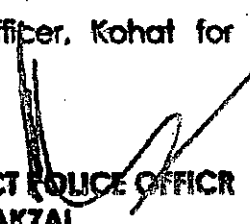
A final Notice was issued to him. Consequently, he was called in orderly room but he did not appear deliberately and he is also absent till now.

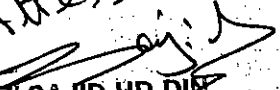
Keeping in view of above facts and having gone through evidence of the record, the undersigned has arrived at the conclusion that accused Sub Inspector liable to be punished under police disciplinary rules-1975. Therefore, I Nazir Ahmad Khan, District Police Officer, Orakzai in exercise of the powers conferred upon me, awarded him Major punishment of reverted to the rank of ASI (BPS-09) with immediate effect.

OB No 387
Dated 27/6/2023


**DISTRICT POLICE OFFICER
ORAKZAI**

- 1. Copy of above is submitted to the Regional Police Officer, Kohat for information, please.
- 2. Pay Officer and OASI for necessary action.


**DISTRICT POLICE OFFICER
ORAKZAI**

Attested.

QAZI SAJID-UD-DIN
MA (Pol. Sc) LLB
(Retd) SSF
Advocate Kohat

Annex D (12)

THE WORTHY DEPUTY INSPECTOR GENERAL OF
POLICE KOHAT REGION KOHAT

DEPARTMENTAL APPEAL UNDER RULE 11 OF THE
POLICE RULES 1975 (AMENDED 2014) AGAINST THE
ORDER OF DISMISSAL OF THE APPELLANT DATED
29-12-2023 RECEIVED ON 09-01-2024 ISSUED BY THE
WORTHY DISTRICT POLICE OFFICER ORAKZAI

Respected Sir,

With great respect and veneration, the appellant may kindly be allowed to submit the following for your kind and sympathetic consideration.

FACT OF THE CASE:

1. That the appellant is a bonafide resident of Garhi Mawaz Khan Kohat City. He belongs to a respectable family and he himself is a law abiding citizen. Moreover, appellant is educated upto Master of Arts in Mathematics.
2. That in the year 2009, the appellant was selected as PASI by the Khyber Pakhtunkhwa Public Service Commission.
3. That after assuming charge as PASI, the appellant started his official work with zeal and zest. From the official work, his senior officers were satisfied and the appellant never provided any opportunity to any quarter to lodge complaint against the appellant.
4. That the appellant also successfully completed basic and other courses and also the upper course in the year 2019.

A. Masood
Qazi
SAJID-UD-DIN
MA (POL) LLR
(Retd) SSF
Advocate Kohat

- (12)
5. That the appellant due to his efficiency and good work, not only was awarded cash and commendation certificate but also promoted to the rank of Sub Inspector in the year 2016.
 6. That unfortunately infant child of the appellant developed cardiac disease and for medical treatment, he was required to be taken to Lahore.
 7. That before taking his son to Lahore, the appellant submitted application for long leave w.e.f. 16-04-2023 in the office of the DPO Orakzai and the next date the appellant proceeded to Lahore along with his ailing son for medical treatment.
 8. That when the appellant came back after completion of the medical treatment of his son, the appellant went to the office of the worthy DPO Orakzai for joining duty, but the appellant was informed that he has been dismissed from service. Copy of the order of dismissal of the appellant was received by the appellant on 09-01-2024, which is enclosed herewith as a ready reference.
 9. That surprisingly, before dismissal from service, the appellant on the same charge / allegation was awarded major punishment of reduction from rank of Sub Inspector to the rank of Assistant Sub Inspector (ASI) copy of the order is enclosed.
 10. That the authority concerned did not sense / felt urgent nature of the disease of the son of the appellant and the appellant was victimized / punished twice for the same allegation, which is repugnant to law, rules and Constitution of Pakistan.
 11. That the order of dismissal of the appellant consists of a number of discrepancies, loop holes and lacunas, therefore, it is open to be called in question. Hence following are some of the grounds of appeal among the other which may in the interest of law, justice and fair play be considered sympathetically.

GROUND OF APPEAL:

- a) That the order of the dismissal of the appellant from service dated 29-12-2023 received on 09-01-2024 is not in accordance with law, rules and evidence on record, hence it is liable to be set aside.
- b) That application for granting long leave to the appellant should have been decided by the competent authority and thereafter may have initiated departmental proceedings. Unfortunately, without deciding fate of the leave application, the department opted to proceed against the appellant departmentally.
- c) That before proceeding against the appellant departmentally, it was necessary to have decided fate of the leave application. By not doing so the competent authority has fell in a material error. On account of such an error, the impugned order is not sustainable in the eyes of law.
- d) That perusal of the impugned order will indicate that neither charge sheet nor the statement of allegations were served upon the appellant.
- e) That for departmental enquiry, service of charge sheet and statement of allegation upon the delinquent official is mandatory. In absence of service of the charge sheet departmental enquiry cannot be conducted, if it is conducted, the entire proceedings and as well as outcome of such an enquiry is illegal abinitio and the order is not of any consequence upon rights of the appellant.
- f) That if at all it was desired to proceed against the appellant departmentally and there was no likelihood of joining the appellant enquiry proceedings, in that case option of ex-parte departmental proceedings could be exercised. However, record

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reflects that the enquiry officer did not exercise the option of ex-parte proceedings and proceeded against the appellant like a regular enquiry, which is a material error having made the enquiry against the appellant a legally defective enquiry and no punishment can be awarded on basis of such illegally defective enquiry.

g) That for initiation of ex-parte proceedings against a delinquent official, publishing charge sheet in two national daily news papers is mandatory. After publishing the charge sheet, enquiry officer can proceed against the defaulter official in his absence. In the case of the appellant no such exercise was taken by the competent authority, hence no punishment can be awarded upon such a legally defective enquiry.

h) That even though complete address was available to the office of the DPO Orakzai and as well as contact number of the appellant was also on record of the office but the enquiry officer did not consider it appropriate to inform the appellant about the enquiry against him. The DPO office and the enquiry officer succeeded to keep the appellant in dark and passed the of their choice. Thus the order enquiry coupled with the impugned dismissal order are based on malafide and thus the impugned order is not sustainable in the eyes of law.

i) That prior to the instant impugned order, the appellant was awarded major punishment of reduction from the rank of ASI on the basis of same allegations. However, in light of Art 13 of the constitution of Pakistan double punishment on the basis of same allegation is unconstitutional and such order has got no legal sanctity in the eyes of law and it deserves to be brushed aside.

j) That the impugned punishment order indicates that the appellant was awarded punishment of dismissal from service w.e.f. the

date of absence. However, in this regard it is submitted that Art 12 of the Constitution of Pakistan has laid down clearly that retrospective punishment has been treated as illegal and against constitution. Thus punishment at this score alone is liable to be set aside.

- k) That the appellant has got leave account in office of the DPO Orakzai and long leave / casual leave are outstanding against the department. It is humbly requested that the period treated as absence may be treated as one of the kind leave.
- l) That the appellant is not a habitual absentee and before the instant case, he has never faced any enquiry nor was awarded any punishment.
- m) That the punishment awarded to the appellant is harsh and does not satisfy the ends of natural and codal justice.
- n) That Under Art 10A of the Constitution it is fundamental right of the appellant that he should be given fair, independent and transparent trial. If authority is failed to do so, then order is treated as repugnant to the law and ultra-vires of the constitution.
- o) That the impugned order of dismissal of the appellant from service is not in accordance with law and rules, hence it deserves to be set aside and appellant be reinstated in service from the date of dismissal with all back benefits.
- p) That the appellant is head of his family and service is the only source of income. If the punishment is maintained family of the appellant will face starvation like situation and the appellant apprehends that he may not sustain irreparable loss.

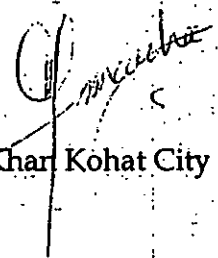
q). That being member of noble family, being educated persons, being responsible police officer, the appellant cannot think / imagine to absent himself deliberately and intentionally. The appellant was compelled to proceed on leave because it was the matter of life and death of his infant son and due to proper care and caution with the blessings of Allah, he recovered.

r) That if deemed proper the appellant may kindly be heard in person.

PRAYER:

It is therefore, humbly prayed that by accepting the instant departmental appeal, impugned punishment order being not in accordance with law, rules, natural / codal justice and fairplay, therefore, it may graciously be set aside. The appellant may kindly be reinstated in service from the date of punishment with all back benefits. That appellant and his family will be thankful throughout their lives for this act of kindness.

Yours Obediently
Imran Khan
Ex. ASI
R/o Garhi Mawaz Khar Kohat City
Cell: 0334-1903435



Annex E (18)

ORDER

This order will dispose of the departmental appeal preferred by Ex-Assistant Sub Inspector Imran Khan No.92/K of Operation Staff Orakzai, against the order passed by District Police Officer, Orakzai vide OB No.888, dated 29.12.2023 whereby he was awarded major punishment of dismissal from service from the date of absence i.e 18.04.2023.

Brief facts of the case are that Ex-ASI Imran Khan No.92/K while posted as Reader to District Police Officer, Orakzai absented himself from his lawful duties with effect from 18.04.2023 without prior permission of the senior officers.

District Police Officer, Orakzai initiated proper departmental enquiry proceedings against him and Superintendent of Police, Investigation, Orakzai was appointed as Enquiry Officer. The Enquiry Officer after fulfillment of codal formalities, submitted his findings stating therein that the delinquent officer was summoned time and again but he did not bother to appear before the Enquiry Officer. Hence the delinquent officer was found guilty of the charges leveled against him. On recommendation of the enquiry officer, the District Police Officer, Orakzai issued Final Show Cause Notice to him vide No.842/EC(Enq) dated 04.06.2023 but he did not submit reply of the Final Show Cause Notice deliberately.

Keeping in view the recommendations of the Enquiry Officer and the above cited circumstances, the delinquent officer was awarded major punishment of dismissal from service vide District Police Officer, Orakzai OB No.888 dated 29.12.2023.

Feeling aggrieved from the order of District Police Officer, Orakzai, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in the office of the undersigned on 07.05.2024. However, the appellant could not advance any plausible justification in his defense. Moreover, his appeal is also time barred by 08 days.

Foregoing in view, I, **Sher Akbar, PSP, S.St, Regional Police Officer, Kohat**, being the appellate authority, am of considered opinion that orders passed by District Police Officer, Orakzai is justified and, therefore, warrants no interference. Hence, appeal of Ex-Assistant Sub Inspector Imran Khan No.92/K is hereby **rejected**, being meritless and time barred.

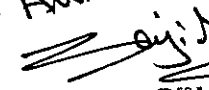
Order Announced

07.05.2024

No. 4537 /EC, Dated Kohat the 23, 05 /2024

Regional Police Officer,
Kohat Region

Copy forwarded to District Police Officer, Orakzai for information and necessary w/r to his office Memo: No.566/EC, dated 22.02.2024. Service Record and Enquiry File are returned herewith.

Attested

QAZI SAJID-UD-DIN
MA (Pol. Sc) LLB
(Retd) SSF
Advocate Kohat

THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

Imran Khan

Appellant

VERSUS

Inspector of Police (KPK) Peshawar etc.

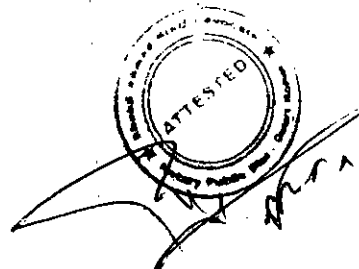
Respondents

Appeal

AFFIDAVIT

I, Imran Khan son of Hakim Khan Resident of Gahri Mawaz Khan
Tehsil & District Kohat do hereby solemnly affirm and declare on
oath that the contents of this accompanying appeal are true and
correct to the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Tribunal

DEPONENT



Imran Khan

CNIC No: 14301-5163069-7

Cell No: 0334-1903435

Identified by:

Qazi Sajid ud Din Advocate

QAZI SAJID-UD-DIN
MA (Pol. Sc) LLB
(Retd) SSP
Advocate Kohat

Annex G (20)

**THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR**

Imran Khan

Appellant

VERSUS

Inspector of Police (KPK) Peshawar etc.

Respondents

ADDRESSES OF THE PARTIES

Appellant:

Imran Khan
Ex ASI
R/o Garhi Mawaz Khan, Kohat City.
Cell No. 0334-1903435

RESPONDENTS:

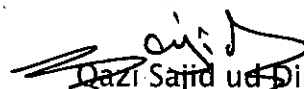
4. Inspector of Police (KPK) Peshawar.
5. Deputy Inspector of Police Kohat Region.
6. District Police Officer, Distt: Orakzai.



**IMRAN KHAN (Appellant)
EX ASI No.92-K**

Dated: -06-2024.

Through:



Qazi Sajid ud Din Advocate

**QAZI SAJID-UD-DIN
MA (Pol. Sc) LLB
(Retd) SSP
Kohat**



Department of Pediatric & Adult Congenital Cardiothoracic Surgery

Ittefaq Hospital, Lahore.

Tel: 042 5843005.

Operation Note

Date: 30/5/2016

Patient's name: **Behram** Age: **12 months / 8 kg** Sex: **male**

Pre-op Diagnosis: **TOF, small PA, borderline LV Cyanosis**

Operation: **Left Thoracotomy, modified BT shunt between base of left subclavian artery with LPA by 5mm PTFE graft.**

Post-op Diagnosis: **TOF, small PA, borderline LV Cyanosis**

Surgeon : **Dr Mohammad Asim Khan, MD FRCS**

Assistant : **Mrs. Ishrat Fatima**

Anaesthetist : **Dr Farook Atiq**

Anaesthesia: **G/A.**

Scrub Nurse: **Miss Shumaila**

Indication and brief history:

Patient with diagnosis of **TOF, small PA, borderline LV Cyanosis** admitted for elective **BT shunt.**

Procedure:

Left thoracotomy via 3rd ICS

Left subclavian artery and LPA dissected out.

Heparinization, a size 5 mm PTFE graft anastomosed between base of Left subclavian artery with LPA using Prolene 7/0.

Hemostasis done.

One chest drain placed.

Closure:

Intercostal with Vicryl 2/0, fascia with vicryl 2/0, subcut with vicryl 3/0, skin with vicryl 4/0.

Post-Op Status:

Transferred to ICU in critical condition, intubated.

Dr Mohammad Asim Khan, MD, FRCS



Department of Paediatric Cardio-thoracic Surgery
Ittefaq Hospital, Lahore.

Discharge Summary

MRN:393188

Patient's name	Bahram	Age	1 year	Wt.	8kg	Sex	male
Address	H NO 4 Mandaan Ghari Mawaz Khan						
Surgeon	Dr Mohammed Asim Khan MD, FCPS, FRCS.						
Cardiologist	Dr Masood Sadiq MRCP, FRCPCH, FRCP						
Diagnosis	TOF+Small LV						
Operation	BT Shunt						
Blood group	B+ive						
Date of admission	30-05-2016						
Date of operation	30-05-2016						
Date of discharge	01-06-2016						

Post-op Echo and operational notes are attached with discharge slip.

ECHOCARDIOGRAM

Name. **Behram**

Age/ Sex **6 years male**

Date **01.01.2021**

			<u>M. Mode</u>			<u>DOPPLER</u>
IVSd	()	()	EF	()	()	
LVDD	()	()	PS	()	()	PS gradient = 66 mm Hg
IVPWd	()	()	AO	()	()	LVOT peak gradient = 44 mm Hg
IVDs	()	()	IAS	()	()	

SEGMENTAL SEQUENTIAL ANALYSIS:

- Levocardia. Situs solitus.
- Atrioventricular & ventriculoarterial concordance.
- Normal systemic & pulmonary venous connections.
- No tricuspid regurgitation and mitral regurgitation.
- Dominant RA/RV.
- Large perimembranous ventricular septal defect with < 50 % aortic over-ride over ventricular septum shunting bidirectional.
- Sub-aortic ridge due to septal spur with moderate LVOT obstruction.
- Dilated aortic root with mild aortic regurgitation.
- Aortic root = 25.6 mm.
- No additional muscular ventricular septal defect.
- There is antero-superior mal-alignment of outlet septum with severe infundibular pulmonary stenosis.
- Confluent and good size branch pulmonary arteries
- MPA = 14.6 mm. RPA = 10.5mm, LPA = 12.8 mm, DAO = 10.2 mm.
- Patent left side BT shunt.
- Left aortic arch. No coarctation of aorta.
- Bilateral SVC with left SVC opening into RA via dilated coronary sinus.
- Good biventricular functions.

CONCLUSIONS:

- *Patent left side BT shunt.*
- *Tetralogy of fallot.*
- *Sub-aortic ridge due to septal spur with moderate LVOT obstruction.*

Dr. Ijaz Hussain.

MBBS, FCPS(Paediatrics)

FCPS(Paediatric Cardiology)


Associate Professor



Medicines on Discharge:

Tab. Cefspan 200 mg	1 tablet once a day for 7 days
Tab. Distalgesic	1 tablet three times a day for 7 days
Tab. Spiromide 20/50 mg	1 tablet two times a daycontinue till further order
Tab. Capril 12.5 mg	½ tablet three times a daycontinue till further order
Tab. Digoxin 250 ug	½ tablet once a daycontinue till further order

- ✚ Follow up after 10 days for stitches removal
- ✚ No dietary restriction
- ✚ Daily bath with wound wash
- ✚ Follow up Echo after 1 month and then accordingly as advised by Cardiologist


Dr. Abdur Rehman
M.O. PCICU



Department of Paediatric Cardio-thoracic Surgery
The Ittefaq Hospital Lahore
Discharge Summary

MRN: 553287

IHT: 976006

Patient's name	Mr M Behram	Age	10 year	Wt.	28 kg	Sex	Male
Address	Kohat						
Surgeon	Dr Mohammed Asim Khan MD, FCPS, FRCS.						
Cardiologist	Dr Ijaz Hussain						
Diagnosis	DORV, TOF, LVOTO, s/p Left BTS, LPA origin stenosis						
Operation	Median-Sternotomy, Ligation and division of Left BTS, LPA plasty, VSD enlargement and closure, RVOTO resection via TV and MPA and MPA patch						
Blood group	B +ve						
Date of admission	04-10-2023						
Date of operation	06-10-2023						
Date of discharge	10-10-2023						

Post-op Echo and operational notes are attached with discharge slip.

Procedure:

Median sternotomy,

Aorta, SVC, IVC and MPA dissected out.

Heparinization, Aorto- Bicaval Cannulation, CPB on,

Left BT shunt was dissected, ligated and divided.

AXC after cold Del Nido cardioplegia.

SVC & IVC snugger taken down, RA atriotomy and LV vent thru ASD

LVOT ridge was resected via VSD and it was enlarged and then VSD closed via bovine pericardial patch with the help of 5/0 prolene.

RVOTO resected via tricuspid valve and MPA opened, and LPA opened and it was patched with pericardium.

Surgically created PFO left open, RA closed.

Deairing done and then AXC removed, rewarming started.

Pt. warmed and wean off CPB in normal sinus rhythm with Dopamine @

5mcgm/kg/min, Adrenaline at 0.05 mcgm/kg/min & NTG @ 1 mcgm/kg/min.

Post op echo showed mild RVOT and no residual VSD.

Decannulation, protamine and heamostasis done.

Two drains placed.

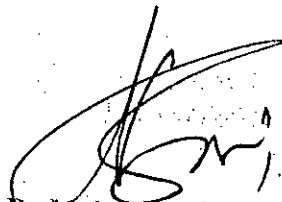
2 RV temporary pacing wires were placed.

Closure:

Sternum with steel wire No 4, fascia with vicryl 2/0, subcut with vicryl 3/0, skin with Prolene.

Post- Op Status:

Transferred to ICU in Critical condition, intubated.



Dr. Mohammad Asim Khan, MD, FRCS



Department of Paediatric Cardio-thoracic Surgery
The Ittefaq Hospital Lahore
Discharge Summary

MRN: 553287
IHT: 976006

Patient's name	Mr M Behram	Age	10 year	Wt.	28 kg	Sex	Male
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Blood group	B +ve						
Date of admission	04-10-2023						
Date of operation	06-10-2023						
Date of discharge	10-10-2023						

Post-op Echo and operational notes are attached with discharge slip.



ITTEFAQ HOSPITAL (TRUST)

(ISO 9001: 2008 Certified)

Model Town Lahore, UAN: 042-111-770-000, 042-35881981-88 Ext: 366, 367
www.ittefaqhospital.com Email: info@ittefaqhospital.com



904767

Department of Pathology

MR. No. : IHT/984863	Name : Mr Muhammad Behram	(M : 10 yrs)	Registered : 03-Oct-2023 11:24 AM
LAB ID : 904767	Address : Lahore		Received : 03-Oct-2023 09:00 PM
Specimen : Nasopharyngeal Swab	Location : Walk in		Verified : 03-Oct-2023 10:20 PM
Ref. By : Muhammad Asim Khan			Printed : 04-Oct-2023 03:49 PM

MOLECULAR BIOLOGY

Verified

Severe Acute Respiratory Syndrome Corona Virus 2 (SARS-CoV-2) Qualitative PCR

PCR-SARS-CoV-2 (COVID-19)

SARS-CoV-2 (CORONA VIRUS) : Not Detected (Negative)

Methodology:

Real Time Polymerase Chain Reaction (RT-PCR), which is a Nucleic Acid Amplification Test (NAAT).

This test is performed on "Rotor Gene Q, 5 Plex" using Bosphore Novel Corona Virus Kit V2 (Anatolia Geneworks-Turkey) having Lot # SAG014.

Comments:

- **Not Detected (Negative):** This is a qualitative PCR test. Not detected indicates that SARS-CoV-2 RNA is either not present in the specimen or is present at a concentration below the assay's lower limit of detection. The result may be influenced by the stage of infection and the quality of specimen collected for testing. Repeat test if deemed necessary after 72 hours.
- This test result pertains only to the sample collected/submitted.
- Results should be interpreted in correlation with other laboratory and clinical findings.
- Negative results do not exclude infection.
- **Detected (Positive):** Person who is positive for Covid-19 should isolate/quarantine himself and follow instructions given by Health Authorities.

Note :

SARS-CoV-2 test carried out in different laboratories can not always be directly compared with one another due to differences in specimen storage, transport, quality control standards, sensitivity and specificity of the assays used and other variables.

Muhamamad Imran
MEDICAL TECHNOLOGIST

Lt Col (R) Dr. Iftikhar Hussain
CONSULTANT MICROBIOLOGIST

Notes: Electronically verified report, signatures not required. Identity of the patient not verified. Any query about this may be addressed within five days of reporting, the duration for which the samples are preserved

Powered by: MEDIX (HIMS), A Project of Fauji Foundation, Pakistan. (LAB986)

Page 1 of 1

Dr. Ghulam Rasool Sial
MBBS, MCPS, MPhil, FCPS
Haematologist & HOD

Dr. Iftikhar Hussain
MBBS, MCPS, MPhil
Microbiologist

Dr. Omer Waqas
MBBS, FCPS(HistoPath)
Histopathologist

Peshawar General Hospital



ITTEFAQ HOSPITAL (TRUST)

(ISO,9001: 2008 Certified)

MODEL TOWN, LAHORE-14 UAN: 111-770-000 TEL: 042-35881981-88 LAB. EXT: 366, 367 FAX: 3586160

Dept. of Pathology

REV # 00
DOC/IHT/LAS 0-

Lab #: 16 - 05 - 1078131
Patient Name: BAHRAM
Gender: Male
Referring Doctor: Dr. ASIM KHAN
Report Destination: PAEDS CARDIAC ICU
Address: CARDIAC SURGERY, PCICU,
Sample: BLOOD

Patient Id: 496706
Hospital #: 393188
Age: 1 years
Test Registered: 30-05-2016 11:46:21
Sample Received: 30-05-2016 12:13:51
Sample Source: Ittefaq Hospital

INDOOR

HEMATOLOGY

<u>Test(s)</u>	<u>Result</u>	<u>Normal Value</u>	<u>Unit</u>
Blood Group	B		
Rh Factor	POSITIVE		

Comments:

DR. GHULAM RASUL SIAL
CONSULTANT HAEMATOLOGIST

Date: 30-May-2016

The reference ranges are according to the Age/Sex provided to the laboratory. All test results should be correlated with patient history & clinical impression.

Dr. Ghulam Rasul Sial MBBS, MCPS, MPhil, FCPS Haematologist & HOD	Prof. Dr. M. Sarwar Bhatti MBBS, DTCD, MPhil, PhD Consultant Chemical Pathologist	Dr. Iftikhar Hussain MBBS, MCPS, MPhil Microbiologist	Dr. Rizwan Ullah Khan MBBS, FCPS(HistoPath) Histopathologist
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PGH Peshawar General Hospital

MR #
Patient Name
Age
Gender

P23052110
Baby Of Umme Salma
2-Days
Female

Receipt #
Father's Name
Receipt Date
Referred By

P2305-9492
Imran Khan
22-May-2023
Dr. Abid Salahuddin

Bedcase Ultrasound

(Skull)

Findings:

There is conspicuously increased reflectivity and echogenicity at the right caudothalamic groove. The left caudothalamic groove is normal and maintain its y-shape appearance. The rest of the thalami, mid-brain and the brain stem, ventricles, corpus callosum and the cingulate gyrus, cerebellum, cavum septum pellucidum and the periventricular white matter are uneventful. No subdural effusion.

IMPRESSION:

- Findings are suggestive of Grade-I germinal matrix hemorrhage in right caudothalamic groove and requires further workup with CT brain for complete evaluation.

Dr. Muhammad Asif



U. A. N:
091-111-111-091



6A, Sector A2,
Phase 5, Hayatabad, Peshawar



info@pgh.com.pk
www.pgh.com.pk/



**PESHAWAR
GENERAL
HOSPITAL**

DISCHARGE SUMMARY

Patient Name P2305216 - Umme Salma
Father's Name Imran Khan
Age/Gender 33-Years / Male
Consultant Dr. - Mamoona Riffat , (Obstetrician & Gynaecologist)
Admission Date 21-May-23 04:16 PM
Date of Discharge 23-May-23
Address Kohat

DIAGNOSIS

G18P3+14 with 33+3weeks POG with PIH with previous 3 c/s with Polyhydramnios and Obesity

NOTES

PROGRESS

C/SECTION + BTL NOTES:

UNDER ALL ASEPTIC MEASURES, PT SHIFTED TO OT, PUT IN S/P, PARTS C/D.ABD OPENED THROUGH P/F INCISION.RECTUS CUT, MUSCLES SEPARATED.LUS

IDENTIFIED, A SMALL NICK GIVEN, EXTENDED LATERALLY, AN ALIVE FEMALE BABY DELIVERED AS CEPHALIC WITH A/S 4/10 10/10 F/B DELIVERY OF PM BY CCT

METHOD.UTERUS CLEANED AND STITCHED IN LAYERS .BTL DONE IN ROUTINE WAY. HEMOSTASIS SECURED.ABDOMEN CLEANED AND STITCHED IN REVERSE

ORDER.PACK PLUS NEEDLE COUNT COMPLETE

PV DONE: MINIMAL BLEEDING, 4 TAB CYTOTEC KEPT PR

CLEAR URINE IN BAG

INVESTIGATIONS

	Normal Values	Unit	21-May-2023 17:40
Plasma Glucose Random	80-200	mg/dl	88
	Normal Values	Unit	21-May-2023 17:40



**PESHAWAR
GENERAL
HOSPITAL**

DISCHARGE SUMMARY

Patient Name P23052110 - Baby Of Umme Salma
Father's Name Imran Khan
Age/Gender 3-Days / Female
Consultant Dr. - Samreen Ahmad , (Consultant - Peadiatrician)
Admission Date 21-May-23 08:16 PM
Date of Discharge 23-May-23
Address Peshawar

Patient is Expired

DIAGNOSIS

neonatal seizures
 Hypoxic ischemic encephalopathy [HIE]

HISTORY

FEMALE BABY BORN PRETERM AT 33 WEEKS OF GESTATION IN CRITICAL STATE TO NICU FOR VENTILATORY SUPPORT

PROGRESS

THIS BABY BORN PRETERM AT 33 WEEKS OF GESTATION WITH NO SPONTANEOUS BREATHING AND HEART BEAT WAS RESUSCITATED AND INTUBATED AT BIRTH. SHE WAS SHIFTED TO NICU WAS CONNECTED TO VENTILATOR. SHE WAS STARTED ON INOTROPIC SUPPORT ALONG WITH IV ANTIBIOTICS AND IV FLUIDS. SHE COLLAPSED 2-3 TIMES WAS RESUSCITATED AND REVIVED. HER ARTERIAL BLOOD GASES WERE PERSISTENTLY ACIDOTIC, ETT WAS CLEARED REGULARLY. NEXT MORNING SHE WS GIVEN SURFACTANT. INTENSIVE CARE CONTINUED. DESPITE OF ALL INTENSEIVE CARE SHE REMAINED UNWELL, COLLAPSED AGAIN, RECEIVED CHEST COMPRESSIONS AND 2 SHOTS OF IV ADRENALINE. HER HEART STARTED BEATING AGAIN LATER AT 2AM SHE STARTED TO DROP VITALS WHICH LATER BECAME UNRECORDABLE, RESUS MEASURES WERE REPEATED BUT BABY DID NOT REVIVE AND EXPIRED LATER AT 2:30AM ON 23/5/2023

INVESTIGATIONS

ABO Rh grouping

	Normal Values	Unit	22-May-2023 23:43
ABO Blood Group			"B"
Rh Factor	Negative - Positive		Positive
	Normal Values	Unit	21-May-2023 23:23
Urea	10-50	mg/dl	15
	Normal Values	Unit	21-May-2023 23:23
C.R.P	≤0.5	mg/dL	0.04

DEATH CERTIFICATE

Name	P23052110 Baby Of Umme Salma	Father's Name	Imran Khan
Gender	Female	Age	3-Days
Date of Admission	21-May-23	Date of Expiry	23-May-23 02:30:AM
Address	Peshawar		

SHORT HSITORY

THIS BABY BORN PRETERM AT 33 WEEKS OF GESTATION WITH NO SPONTANEOUS BREATHING AND HEART BEAT WAS RESUSCITATED AND INTUBATED AT BIRTH. SHE WAS SHIFTED TO NICU WAS CONNECTED TO VENTILATOR. SHE WAS STARTED ON INOTROPIC SUPPORT ALONG WITH IV ANTIBIOTICS AND IV FLUIDS. SHE COLLAPSED 2-3 TIMES WAS RESUSCITATED AND REVIVED. HER ARTERIAL BLOOD GASES WERE PERSISTENTLY ACIDOTIC, ETT WAS CLEARED REGULARLY. NEXT MORNING SHE WS GIVEN SURFACTANT. INTENSIVE CARE CONTINUED. DESPITE OF ALL INTENSEIVE CARE SHE REMAINED UNWELL, COLLAPSED AGAIN, RECEIVED CHEST COMPRESSIONS AND 2 SHOTS OF IV ADRENALINE. HER HEART STARTED BEATING AGAIN LATER AT 2AM SHE STARTED TO DROP VITALS WHICH LATER BECAME UNRECORDABLE. RESUS MEASURES WERE REPEATED BUT BABY DID NOT REVIVE AND EXPIRED LATER AT 2:30AM ON 23/5/2023

DIAGNOSIS


- neonatal seizures
- Hypoxic ischemic encephalopathy [HIE]

TREATMENT GIVEN

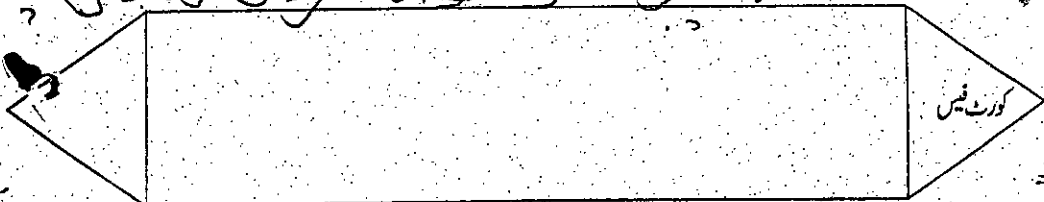
Ventilatory support
inotropic support
IV fluids
IV antibiotics
surfactant
Bicarb

CAUSE OF DEATH

cardio pulmonary arrest


Signature of Registrar Unit
(Name & Designation Block Letters)

بعدالت جناب خیر محنتو کو الہ سروس ٹریبونل لپٹار



کورٹ فیس

۲۰ مئی

مقدمہ

معدت نمبر

جرم ذریعہ

موزنہ

تھانہ

بیم آئی سی پی کے پی کے ڈی
عمرالخانہ
ایکٹیس ای لیس آئی

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جوابدہی کل کارروائی متعلقہ آس مقام کے لیے صاحبی ساچرا لہریں اور پورٹ
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا اختیار ہوگا۔ نیز وکیل صاحب کو کرنے راضی نامہ و مقرر
ثالث و فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء وصولی چیک در روپیہ اور عرضی دعویٰ اور
درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور
منسوخی و نیز دائر کرنے اپیل نگرانی نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزو کارروائی
کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا
اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے
سبب سے ہوگا اس کے مستحق کیا صاحب موصوف ہوں گے نیز بقایا خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی
مقام دورہ پر ہو یا حد سے باہر ہو وکیل صاحب پابند نہ ہو گے کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

الرقوم

مقام کوہاٹ

Attested & Accepted

QAZI SAJID-UD-DIN
MA (Pol & Sc) LLB
(Retd) SSP
Advocate Kohat

صحت عمرالخانہ
ایڈوکیٹ