


FORM OF ORDER SHEET

Court of _____

Appeal No. 959/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/07/2024	<p>The appeal of Mr. Adil Afridi resubmitted today by Mr. Farooq Shah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 12.07.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

Respected Madam,

It is submitted that the present appeal was returned to counsel for the appellant for removing the deficiencies (Flag-A). Today i.e. 01.07.2024 the learned counsel re-filed the appeal without removing the objection no.1.

The appeal is now submitted to your honor under rules 7 (c) of the Khyber Pakhtunkhwa Service Tribunal rules 1974 for appropriate order please.

Hon'ble Member (J).

OFFICE ASSISTANT
17/7/24

objection sustained be return to
doing the needful. Be re-submitted
within 7 days. K
31/7/24.


No 282/inst/2024/KPST
Dated 3/7/24

The appeal of Mr. Adil Afridi received today i.e on 26.06.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ① According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 1 & 3 are un-necessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2- Memorandum of appeal is not signed by the appellant.
- 3- Affidavit is not attested by the Oath Commissioner.
- 4- Copy of show cause notice attached with the appeal is printed on rough page which is not acceptable.
- 5- Page no. 45 of the appeal is illegible.

No. 263 /Inst./2024/KPST,

Dt. 27/6 /2024.


27/6/24
OFFICE ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR

Mr. Bilal Ahmad Kakaizai Adv.
High Court Peshawar.

1/7/24: Re-submitted Respondent No. 1 & 3
are necessary party.

Marked.
1/7/24

Total - 4 copies
Six - Copies are required.

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No:

959 / 2024

ADIL AFRIDI

Versus

IG Police, Peshawar etc

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Wakalatnama		

Appellant

Through:

BILAL AHMAD KAKAIZAI

Advocate, Supreme Court of Pakistan.

213, Sunehri Masjid Road, Near HBL

Nothia Branch, Peshawar Cantt.

0300-9020098.

2

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No: 959 / 2024

ADIL AFRIDI,
Ex-Constable, (3628)
Muslim Abad No.1, Lali-Bagh Bazar,
Kakshal, Peshawar City.

..... APPELLANT

Versus

1. SUPERINTENDENT OF POLICE,
Headquarters, Peshawar.
2. CAPITAL CITY POLICE OFFICER, PESHAWAR,
CCPO Office, Peshawar.

..... RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST IMPUGNED ORDER NO. 1842-47/PA/SP DATED 14.02.2024, WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE ON EX-PARTE BASIS, WITH IMMEDIATE EFFECT.

Prayer: That on acceptance of this Service Appeal the Impugned Order mentioned above may please be set-aside being against the law, and Appellant may please be reinstated in service with all back wages and benefits, with such other relief as may deem fit in the circumstances of the case may also be granted.

3

Respectfully Sheweth,

Short facts, giving rise to present Service Appeal, are as under:

1. That, Appellant was inducted in service of Police Department as constable on 17.03.2017, by the Competent Authority.
2. That, Appellant performed meritorious services during his entire career and was lastly posted at Police Station Rehman Baba, Peshawar.
3. That, during the course of employment as constable, Charge Sheet dated 12.09.2023 was issued in the name of the Appellant, as per his information, however the same was never handed over to him, which fact is also mentioned in the Impugned Order.
4. That, only one notice, purportedly issued by the Enquiry Officer, was received by brother of the Appellant namely Syed Nawaz, unofficially, through one of his Friends on Whatsapp, (later on disappeared from the wall) with regard to appearance of the Appellant before the Enquiry Officer, in response whereof brother of the Appellant appeared and stated that Appellant is suffering from a psychiatric disease and is under treatment in Islamabad and will be available for any proceedings as soon as he recovers, (copy of the Notice is not available due to automatic disappearance from the Whatsapp wall). Despite having information and knowledge of ailment of the Appellant, Ex-parte proceedings were initiated and concluded against him, mala-fidely, copies of the Medical Certificates / documents are attached as Annexure A.
5. That, similar to above, Show Cause Notice dated 27.11.2023 was also issued in the name of the Appellant but for the purpose of placing the same on enquiry / personal file of the Appellant as it was never served or communicated to the Appellant before issuance of Impugned Order dated 14.02.2024, copy of the Show Cause Notice dated 27.11.2023 along with a Covering Letter dated 28.11.2023 is attached as Annexure B.
6. That, without conducting any enquiry, either fact finding, formal or regular by the Respondents against the Appellant, Impugned Order of Removal was issued, copy of the Impugned Removal Order dated 14.02.2024 is attached as Annexure C.
7. That, Appellant submitted his Departmental Appeal against the Impugned Removal Order on 29.02.2024, copy of the Departmental Appeal dated 29.02.2024 is attached as Annexure D.

8. That, the Respondents / Department failed to decide the fate of the Departmental Appeal of the Appellant within requisite statutory period, hence this Appeal, on the following amongst other grounds:

GROUNDS:

- A. That, the Removal Order is illegal, unlawful, void and ineffective.
- B. That, same is against the principles of natural justice, also.
- C. That, right from the beginning till culmination of the Enquiry, no Notice or letter etc was ever directly communicated to the Appellant by the Department hence actions taken against the Appellant amounts to nullity in the eyes of law.
- D. That, procedure as mentioned in the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 was never adopted by the Department while dealing the case against the Appellant.
- E. That, it was incumbent upon the Respondents Department to have issued Notice through two widely circulated Newspapers with regard to initiation of Enquiry against the Appellant, which has purposely been left by the Competent Authority because the Respondents were trying to get rid of the Appellant on ex-parte basis probably to adjust someone on his vacant post.
- F. That, Appellant was not allowed to clarify his stance nor any chance of personal hearing was afforded to him.
- G. That, prior to issuance of Removal Order, no Final Show Cause Notice was communicated or served upon the Appellant nor the Enquiry Proceedings / Report was handed over to the Appellant.
- H. That, no Formal / Regular Inquiry was conducted by the Department, moreover it is now well established principle of law that where the Department proposed to inflict major punishment upon an employee, the Regular Inquiry, to that effect, is must and necessary.
- I. That, the subject mentioned Order is based on malafide, harsh in nature and has been passed in arbitrary manner.
- J. That, allegations as levelled and punishment as imposed seems to be based on surmises and conjectures.

- K. That, Appellant has been condemned unheard hence he wishes to be heard in person by the Competent Authority.
- L. That, the Appellant has more than 6 years of continuous and unblemished service with the Department wherein he was never / ever been charge sheeted nor any disciplinary action was ever initiated against him.

It is, therefore, requested that Service Appeal be accepted as prayed for.

Appellant

Through:

BILAL AHMAD KAKAIZAI
Advocate, Supreme Court of Pakistan.
213, Sunehri Masjid Road, Near HBL
Nothia Branch, Peshawar Cantt.
0300-9020098.

FAROOQ SHAH


AKHUNZADA AHMAD SAEED

SOHAIL MARWAT
(Advocates, High Court)

6

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No: _____ / 2024

ADIL AFRIDI

Versus

IC Police, Peshawar etc

AFFIDAVIT

I, ADIL AFRIDI, Ex-Constable, (3628), Muslim Abad No. 1, Lali-Bagh Bazar, Kakshal, Peshawar, Appellant, do hereby on oath affirm and declare that the contents of the Service Appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.

Deponent.

Identified by:

BILAL AHMAD KAKAIZAI

Advocate, Supreme Court of Pakistan.

(7)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No: _____ / 2024

ADIL AFRIDI

Versus

IG Police, Peshawar etc

ADDRESSES OF PARTIES.

APPELLANT:

ADIL AFRIDI, Ex-Constable, (3628), Muslim Abad No.1, Lali-Bagh Bazar,
Kakshal, Peshawar City.

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa, Through Inspector General of Police, Police Lines, Peshawar.
2. Superintendent of Police, Headquarters, Peshawar.
3. Deputy Superintendent of Police, Complaints / Enquiries, Capital City Police, Peshawar.
4. Capital City Police Officer, Peshawar, CCPO Office, Peshawar.

Appellant

Through:

BILAL AHMAD KAKAIZAI

Advocate, Supreme Court of Pakistan.

213, Sunehri Masjid Road, Near HBL

Nothia Branch, Peshawar Cantt.

0300-9020098.

"A"

(8)

64

Psychiatrist

Dr. Zahid Nazar

MBBS, FCPS, (Psychiatry)
PMDC Reg # 4888-N

Professor

Department of Psychiatry,
PGMI/ Lady Reading Hospital
Peshawar.

3-5-2023

NOT VALID FOR
MEDICO-LEGAL / COURT
PURPOSES

سائیکیاٹرست

ڈاکٹر زاہد نذر

ایم بی بی ایس، ایف سی پی ایس، (سائیک)

پروفیسر لیڈی ریڈنگ ہسپتال

ماہر امراض دماغی۔ اعصاب۔ سر درد۔ ڈپریشن

مرگی۔ نشیات و جنسی امراض

Aqil Afzali
28 year
Peshawar

LAUPT

Rx ①

Ketidone / TRAMOL

(3) PROPR

1+1

1+1

Gabapentin

(2) Cardinal

4) ~~Zynac~~

1+1

~~Clonidine~~

(5) Rivotril

(6) Tineu

1+1

1+1

7) GASTRO

7/6/2023
ZCN

دوبارہ معائنہ

ڈاکٹر زاہد نذر ایف سی پی ایس (SMS) بر

Mob: 0300-5870334

4:00 بجے تا 8:00 بجے شام

پتہ: رحمان بابا کالونی نزد ڈگری گارڈن نہر بالمقابل پشاور امید جنگ پشاور

ہر کی معلومات کیلئے

0313-5522767

0313-5522767

Assistant Professor
Dr Allah Noor
 MBBS, FCPS (ENT)
 ENT- Department
 KGMC, MTI-HMC, Peshawar.



Institutional Based Practice
 HAYATABAD MEDICAL COMPLEX
 Medical Teaching Institution
 Khyber Pakhtunkhwa Pakistan
 Tel: Exch: +92-91-921740-46

⑤ Mastoid exploration
 استسنت پرومیسٹر
ڈاکٹر اللہ نور
 ایم بی بی ایس، ایف سی پی ایس (ای این ٹی)
 ای این ٹی ڈیپارٹمنٹ
 کے جی ایم سی، ایم ٹی آئی، ایچ ایم سی پشاور

Pt. Name: Adil Khan Age/Sex: 28yrs/M Address:

Clinical Record / History

Rx

Date: 17-4-2023

MR. No: 002817355

o/b Deaf disease - 9yrs
 & Hearing

o/e

Disturbance
i. granulation
in the Attic region

R - ve ④

W → ④

ABC 44

Tab. Cipval 500mg

④ - 1 - 1

Tab. Lorin NSA

④ - 3 - 1 ④

Bestest. n = dup.

④ - 3 - 3 - 3

Tab. Serhex - 2

④ - ④

Investigations

- P/A

- C.T Temporal
 bone bottle.
 Axial &
 coronal view.

Not Valid for Medico Legal Purpose

ماہ بعد معائنے کیلئے تشریف لائیں۔

For Appointment Contact #: 0302-5131548

IBP : Room #

15

24

Psychiatrist

Dr. Zahid Nazar

MBBS, FCPS, (Psychiatry)
PMDC Reg # 4888-N

Professor

Department of Psychiatry,
PGMI/ Lady Reading Hospital
Peshawar.

Adil Afridi

*38 Year
Peshawar*

NOT VALID FOR
MEDICO-LEGAL / COURT
PURPOSES

06 April 2023

سائیکیاٹرست

ڈاکٹر زاہد نذر

ایم بی بی ایس، ایف سی پی ایس، (سائیک)

پروفیسر ایڈی ریڈنگ ہسپتال

ماہر امراض دماغی - اعصاب - سر درد - ڈپریشن

مرگ - نشیات و جنسی امراض

BP: 130/80

Blackboard

2

(1) TRONY (2)

0/2 - 1 + 1

2 + 1

PROX

1 + 1

130 E SUM

10/10/2023

(3) CARDINOL (40mg)

1 + 1

10/10/2023

14 Epival 300

1 + 1

10/10/2023

10/10/2023

Diclofenac

10/10/2023

28/4/2023
10/5/2023

دوبارہ معائنہ

1) اکثر سے شروع ہڈیوں کا (SMS) کا
Mob: 0300-5870334
8:00 بجے تا 4:00 بجے شام

پتہ: رحمان بابا کالونی نزد ڈبگری گارڈن نہر بال مقابل پشاور امیجنگ پشاور

نہری سٹورٹ کیلے
10/10/2023
0313-5522767

Surgical Hospital Laboratory

Rahman Baba Colony Dabgari Garden
Faisalabad.



118

پاک سرجیکل ہسپتال لیبارٹری
رحمن بابا کالونی ڈبگری گارڈن فیسالور

Name: 4384-ADIL AFRIDI Age: Year: Sex: Male
Date: 06-04-2023 Ref. By: DR ZAHID NAZAR KHAN
Request:

TEST	RESULT	NORMAL
<u>URINE R.E</u>		
<u>PHYSICAL EXAMINATION</u>		
Quantity	20 ml ML	
Colour	Pale Yellow	
PH	Acidic	
<u>CHEMICAL EXAMINATION</u>		
Albumin	Nil	
Sugar	Nil	
<u>MICROSCOPIC EXAMINATION</u>		
Pus Cells	02--03 /HPF	
Red Cells	00--01 /HPF	
Epth Cells	Nil /HPF	
Casts	Nil /HPF	
Granular Cast	Nil /HPF	
Hayaline Cast	Nil /HPF	
Crystal Line Deposits	Nil /HPF	
Ca Oxilate	10--12 /HPF	
AM Urates	Nil /HPF	
Tripple Phosphate	Nil /HPF	
Mucus Threads	Nil	
Bacteria	Nil	

All queries/Discrepancies if any may be referred to our lab. within 24 Hrs, of reporting for re-evaluation / confirmation.

Pak Surgical Hospital Laboratory

Add: Rahman Baba Colony Dabgari Garden
Peshawar.



پاک سرجیکل ہسپتال لیبارٹری
رحمن بابا کالونی ڈبگری گارڈن پشاور

12

Patients Name: ADIL AFRIDI Lab No: 4384
Referred By : ZAHED NAZAR Sex : Male
Specimen : URINE FOR TLC Page : 1
Time : 4:38:30 PM Date : 6-Apr-23

URINE FOR TLC

Urine for Benzodiazepines (BZD) ----- Positive

Urine for Tricyclic Antidepressants (TCA) ----- Negative

Urine for Cannabinoids (THC) ----- Positive

Urine For Methamphetamine (MET) ----- Negative

Urine for Amphetamine (AMP) ----- Negative

Urine for Barbiturates (BAR) ----- Negative

Urine for Morphine (MOR) ----- Negative

Urine for Methadone (MID) ----- Negative

All queries/Discrepancies if any may be referred to our lab. within 24 Hrs, of reporting for re-evaluation / confirmation.

13



GOVT. SARHAD HOSPITAL
FOR PSYCHIATRIC DISEASES
PESHAWAR

گورنمنٹ ہسپتال برائے ذہنی امراض پشاور

ادوی ذہنی برقی
Rs. 10/-

Name Dr. Farhat Ullah

Disease _____ Date 12 JAN 2022

Unit No. DK Yearly No. 1517

33-33
feeling low in
spirit

Farhat
ON Medications
Not improving

Ref to Psychiatrist
DR. Muslims than sb.
for opinions & management
Please

Dr. Farhat Ullah
WIPRAM
P.O. R. D.

ڈاکٹر فارہات اُلالہ کی ہمدردی کریں۔

INDEP
1407

Signature of Farhat Ullah

14

6

پروفیسر

ڈاکٹر محمد ادریس (ماہر دماغی امراض)

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس، ایچ جی پی ای

کلینک: اکبر میڈیکل سنٹر، ڈگری گارڈن، رامداس بازار، پشاور

Professor
DR. MOHAMMAD IDREES

MBBS, MCPS, FCPS, CHPE

Professor of Psychiatry

Peshawar Medical College

Mercy Teaching Hospital

Ex-Professor of Psychiatry

Khyber Medical College

Khyber Teaching Hospital Peshawar

PMDC Reg. No: 875-N

عادل افغان

P. No. 1074

27

100 mg 10 mg

تین

تین

100 mg

5 mg

1 2

تین

1 8

100 mg

1 2

1 2

Handwritten note: ... at home for three weeks

Not Valid for Legal Purposes

روز ہفتہ - اتوار

شاہ میڈیکل سروس سے صرف روز ہفتہ صبح 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

Cell: 0300-0911057, Ph: 091-2581477

(15)

Professor
DR. MOHAMMAD IDREES
MBBS, MCPS, FCPS, CHPE
Professor of Psychiatry
Peshawar Medical College
Mercy Teaching Hospital
Ex-Professor of Psychiatry
Khyber Medical College
Khyber Teaching Hospital Peshawar
PMDC Reg. No: 875-N

عادل افروز

پر وینسر

Police Constable

ڈاکٹر محمد ادریس (ماہر روانی امراض)

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس، سی ایچ پی ای
کلینک: اکبر میڈیکل سنٹر، ڈگری گارڈن، رانداس بازار، پشاور

7
178 Buttrick 72 15000

2024
09/11/2024

عبد

178 Aziz / Akhbar / Zaidon
15000

Cont. do con

15000

2

عبد

2

Not Valid for Legal Purposes

تعطیل بروز ہفتہ۔ اتوار

نمبر لینے اور معلومات کیلئے مغل شاہ میڈیکل سروس سے صرف بروز ہفتہ صبح 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

Cell: 0300-0911057, Ph: 091-2581472

Professor
DR. MOHAMMAD IDREES
 MBBS, MCPS, FCPS, CHPE
 Professor of Psychiatry
 Peshawar Medical College
 Mercy Teaching Hospital
 Ex-Professor of Psychiatry
 Khyber Medical College
 Khyber Teaching Hospital Peshawar
 PMDC Reg. No: 875-N

عادل آفریدی

Dr. P. S. S. S.

16

8

پروفیسر
 ڈاکٹر محمد اوریس (ماہر دماغی امراض)
 ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس، سی ایچ پی ای
 کلینک: اکبر میڈیکل سنٹر، ڈگری گارڈن، رامداس بازار، پشاور

17 July 2022

7/7

Cap. Duloxet 60mg
 1/2

Amis

1/2 Adobalipic 15mg

Dr. P. S. S. S.

0 - 1 - 1
 1/2

Amotivational

Amis

Stimulant

5/5/22

Not Valid for Legal Purposes

تعطیل بروز ہفتہ۔ اتوار

نمبر لینے اور معلومات کیلئے مغل شاہ میڈیکل سروس سے صرف بروز ہفتہ 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ

Cell: 0300-0911057, Ph: 091-2581472



EMERGENCY DEPARTMENT
LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KHYBER PAKHTUNKHWA : 20

17

Invoice #: K02210763854
 Invoice Date: 21-MAY-21 15:05:19

109277

MRNo: K02ACF21274807 Name: Adil Khan District: Peshawar
 Gender: Male Age: 25 Year(s) Serial No. _____

Father / Husband Name: IQBAL HUSSAIN
 Visit Type: Acute Emergency Department: EMERGENCY Counter: EMERGENCY
 Operator: IJAZ AHMAD T-D 24

Complaints:
 - in married
 - increased talking
 - low mood

Rx
 Tab Requint 100ml
 500 300 100 100

Findings:
 Sleep ↓↓
 BPD

Tab Epival 500ml
 100 100

Investigations:

Tab Adivan 1gm
 60 2 100 100
 100 2 100 100

Diagnosis:
 Next Visit: _____

st ap
 Signature: _____

LIFE TIME

MEDICAL LABORATORY



18

NAME : ADIL AFRIDI

SEX : MALE

AGE : ?

SPECIMEN : BLOOD URINE

TEST REQUIRED : FULL BLOOD COUNT, SUGAR R, UREA, CREATININE, TRIGLYCERID

DATE : 13/01/2022

TIME : 16:30:01

REPORT # : 176

REFERRED BY : ?

FULL BLOOD COUNT

TEST	RESULT	UNITS	NORMAL RANGE
Haemoglobin	12.8	G/dl	M: 14 - 18 F: 12 - 14
H.C	3.900	/cmm	4000 - 11000
PCV (HCT)	32.8	%	M: 40 - 54 F: 35 - 47
MCV	84.2	f	76 - 96
MCH	32.8	pg/cell	Ad: 27 - 32 Ch: 24 - 31
MCHC	39.0	G/dl	Ad: 30 - 35 Ch: 28 - 34

DIFFERENTIAL COUNT

Neutrophils	76	%	40 - 70
Lymphocytes	23	%	20 - 40
Eosinophils	05	%	01 - 06
Monocytes	04	%	02 - 10

PLATELET COUNT	1,55,000	/cmm	140,000 - 400,000
----------------	----------	------	-------------------

Umar Khan
BS-Pathology
M.Phil-Bio Chemistry

Munir Khan
BS-Pathology

Karim Ayaz
Lab Tech
DMLT KPK

Haroon Khan
Lab Tech, DMLT KPK
Medical Faculty Peshawar

Quality Lab Services For All Diagnostic Tests

Not Valid For Court

Address: Islam Medical Center Near Khushal Medical Center
Baba Car Parking Peshawar Karim Ayaz: 0300-9177414

LIFE TIME

MEDICAL LABORATORY



19

NAME : ADIL AFRIDI

SEX : MALE

AGE : ?

SPECIMEN : BLOOD URINE

TEST REQUIRED : FULL BLOOD COUNT, SGPT (ALT), SUGAR R, UREA, CREATININE, TRIGLY

DATE : 13/01/2022

TIME : 16:30:24

REPORT # : 176

REFERRED BY : ?

RESULT

TEST	RESULT	UNITS	NORMAL RANGE
SGPT (ALT)	42	U/L	10 ----- 40
SUGAR R	106	mg/dl	80 ----- 160

Umar Khan
BS- Pathology
M.Phil-Bio Chemistry

Munir Khan
BS-Pathology

Karim Ayaz
Lab Tech
DMLT KPK

Haroon Khan
Lab Tech, DMLT KPK
Medical Faculty Peshawar

Quality Lab Services For All Diagnostic Tests

Not Valid For Court

Address: Islam Medical Center Near Khushal Medical Center
Baba Car Parking Peshawar Karim Ayaz: 0300-9177414

LIFE TIME

MEDICAL LABORATORY



20

NAME : ABD. AFRIDI

SEX : MALL

AGE : ?

SPECIMEN : BLOOD URINE

TEST REQUIRED : FULL BLOOD COUNT, SGPT (ALT), SUGAR R, UREA, CREATININE, TRIGLYCERID

DATE : 13/01/2022

TIME : 16:30:01

REPORT # : 176

REFERRED BY : ?

RESULT

TEST	RESULT	UNITS	NORMAL RANGE
CHOLESTEROL	168 ✓	mg/dl	Up to 200
TRIGLYCERIDES	176 ✓	mg/dl	Upto 200
CREATININE	0.8 .	mg/dl	0.5 ----- 1.5
UREA	21 ,	mg/dl	10 ----- 40

Umar Khan
BS- Pathology
M.Phil-Bio Chemistry

Munir Khan
BS-Pathology

Karim Ayaz
Lab Tech
DMLT KPK

Haroon Khan
Lab Tech , DMLT KPK
Medical Faculty Peshawar

Quality Lab Services For All Diagnostic Tests

Not Valid For Court

Address: Islam Medical Center Near Khushal Medical Center
Baba Car Parking Peshawar Karim Ayaz: 0300-9177414

(21)

9/8

Professor
DR. MOHAMMAD IDREES
MBBS, MCPS, FCPS, CHPE
Professor of Psychiatry
Peshawar Medical College
Mercy Teaching Hospital
Ex-Professor of Psychiatry
Khyber Medical College
Khyber Teaching Hospital Peshawar
PMDC Reg. No: 875-N

محمد ادریس

Blue Dept.

پروفیسر
ڈاکٹر محمد ادریس (ماہر دماغی امراض)
ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس، سی ایچ پی ای
کلینک: اکبر میڈیکل سنٹر، ڈگری گارڈن، راجہ اس بازار، پشاور

Cap. Sporton / Lamstrigere 100mg

10 mg

حاجی

آرٹھریٹس سبائیٹیس

Aspirin

As drugs

diapers

asp
stimulants

MD

150mg

20 mg

حاجی

(3) 5/8

Not Valid for Legal Purposes

تعطیل بروز ہفتہ - اتوار

نمبر لینے اور معلومات کیلئے منتقل شاہ میڈیکل سروس سے صرف بروز ہفتہ صبح 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

Cell: 0300-0911057, Ph: 091-2581472

LIFE TIME

MEDICAL LABORATORY



22

NAME : ADIL AFRIDI

SEX : MALE

AGE : ?

SPECIMEN : BLOOD URINE

TEST REQUIRED : FULL BLOOD COUNT, SGPT (ALT), SUGAR R, UREA, CREATININE, TRIGLYCERID

DATE : 13/01/2022

TIME : 16:30:01

REPORT # : 176

REFERRED BY : ?

URINE R/E

PHYSICAL EXAMINATION

Quantity	20 ml
Colour	Pale Yellow
pH	Acidic

CHEMICAL EXAMINATION

Albumin	Nil
Sugar	Nil

MICROSCOPIC EXAMINATION

Pus Cells	01 -- 02 /HPF
Red Cells	Nil /HPF
Epith Cells	Nil /HPF
Ca. Oxalate	Nil

Umar Khan
BS- Pathology
M.Phil-Bio Chemistry

Munir Khan
BS-Pathology

Karim Ayaz
Lab Tech
DMLT KPK

Haroon Khan
Lab Tech , DMLT KPK
Medical Faculty, Peshawar

Quality Lab Services For All Diagnostic Tests

Not Valid For Court

Address: Islam Medical Center Near Khushal Medical Center
Baba Car Parking Peshawar Karim Ayaz: 0300-9177414

23

Dr. Muslim Khan

HRA/500/F/PR/SPEC/57 / PMDC No.7901-N

MBBS (Pesh)
MCPS (Psychiatry)
FCPS (Psychiatry)



ڈاکٹر مسلم خان

ایم۔ بی۔ بی۔ ایس (پشاور)
ایم سی پی ایس (سائیکٹری)، ایف سی پی ایس (سائیکٹری)
موڈو ڈیپارٹور (کینڈا)، ایم اے سی پی (امریکہ)
ماہر امراض نفسیات ذہنی و اعصابی، جنسیات منٹل ہسپتال پشاور
سابقہ ماہر نفسیات و جنسیات LRH پشاور
(ماہر نفسیات، جنسیات، گیس، سرور، مرگ، وہم)

Consultant Psychiatric
Sarhad Hospital for Psychiatric Diseases
Ex. Psychiatrist LRH Peshawar.
Member Pakistan Psychiatric Society

PI Name Adil Khan Age 26 Sex (M) Date 13/1/22
Address _____

Rx
Tey INDEED 40
MP h k (170)
Tey Ramson 30
h f (110) au
Tey cipralax 107
Tey DEQUIT 100
h f (110)

Pulse _____
Temp _____
B.P 140/80
Provisional _____
Diagnosis
Mild
Anxiety
13/1/22

المسٹر نمبر C-18 خوشحال میڈیکل سنٹر، ڈگری گارڈن پشاور
0301-8811963 / 0347-9119365
Email: muslimkhan@gmail.com
دوبارہ معائنہ تاریخ _____

تعطیل پروژا تواری

PTO
ڈاکٹر کے مشورے کے بغیر دوائی کم، زیادہ یا بند نہ کریں
جسم کے دوسرے حصوں کی طرح دماغ کو بھی بیماری لگ
سکتی ہے۔ اس لئے اس کا علاج بھی ضروری ہے۔

24



ACCIDENT & EMERGENCY DEPARTMENT

Lady Reading Hospital
Medical Teaching Institution,
Peshawar - PAKISTAN

Amount Paid : 20
Invoice # : K02181127930
Invoice Date : 28-APR-18 21:19:20

MRNo : K0200002869613 Name : ADIL KHAN
Gender : Male Age : 23 Year(s) District : Peshawar
Father / Husband Name : IQBAL KHAN

Visit Type : Acute Emergent Department : EMERGENCY
Complaints: Counter : EMERGENCY
Operator: ZAHID HUSSAIN

FAI - 1 week before

Rx

Findings:

D/D Trace explosion

Investigations:

- CBC
- Hbsag
- Amr

INVOICE ISSUED
BY Ward Clerk

D/D Trace explosion 06/12/18

22827 - 38909893-1

Muskan

Diagnosis:

Next Visit: _____ Consultant Name: _____ Signature: _____



EMERGENCY DEPARTMENT
LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KHYBER PAKHTUNKHWA

25

Amount Paid: 20

REGD. NO. 184217

Name: Adil Khan

Age:

26 Year(s)

District:

REGD. NO. IOBAL MUSSAIN

Serial No. **33340**

Emergency Department - EMERGENCY

Complaints: **RAD ALI**

RX

Count: 1000

Chest discomfort
 palpitate
 do not sleep

Regd. No. 184217

Findings:

B/P 130/80

PR - 81/min

SpO₂ - 96%

Temp 98.2

Investigations:

ECG. (u)

Regd. No. 184217

Dr. Adil Khan

M. F. Khan
 17/11/2017

Diagnosis:

Next Visit:

Consultant Name:

Signature:

Phone: 9211430

Website: www.lrh.edu.pk



EMERGENCY DEPARTMENT

LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION

PESHAWAR, KHYBER PAKHTUNKHWA

Amount Paid : 20
K02210706145
Invoice Date : 24-APR-21 16:07:15

27

ARNo: K02ACF21245B35

Name: Adil Khan

Gender: Male

Age: 24 Year(s)

District: _____

Serial No. _____

96904

Father / Husband Name: IQBAL HUSSAIN

Visit Type: Acute Emergent Department: EMERGENCY

Counter: EMERGENCY

Complaints: **BRJJAD**

RX

Unmarried

- Restlessness
- Talkative
- Low mood

Refer to Psychiatry ward

Findings:

- Sleep ~~poor~~
- Disturbed memory

Tab Quetyl 1007
3 31 ①
Tab Eprinal 300
1 + 1

Investigations:

Time pt is restless
and increased
Anxiety BPD
Adverse
with effects
talking
Rest
Junior Psych.
Psychiatry Unit
Govt. Peshawar

Tab Provan 2-1
3 10 1 + 1/2
6 10 3 3 ①
3 10 3 ①
3 10 3 ①

Diagnosis:

Syp Bimix
1 + 1

Next Visit: _____

Consultant Name: _____

Signature: _____

28

Dr. Musharaf Khan
M.B.B.S, M.P.H.
Public Health Specialist



NOT VALID FOR COURT

ڈاکٹر مشرف خان
ایم۔ بی۔ بی۔ ایس۔ ایم۔ پی۔ ایچ
پبلک ہیلتھ سپیشلسٹ

Name: عادل آفریدی Add: Age: Sex: Date: 8/11/2020



Clinical Record

Last visit
18/10/2020

Rec

7. Project 23)

2.10

AP care
1.7

6. Defant 207
2.10

6. Defant 207
1.7

of summer + by office
10/11

J

29

Dr. Musharaf Khan
M.B.B.S, M.P.H.
Public Health Specialist



ڈاکٹر مشرف خان

ایم۔ بی۔ بی۔ ایس، ایم۔ پی۔ ایچ
پبلک ہیلتھ سپیشلسٹ

NOT VALID FOR COURT

Name: عادل آفریدی Add: Age: Sex: Date: 18/10/2020



Pac

Clinical Record

Drug Induced

Psychosis

(The induced)

Acute hypomania

Sleep ↓

Disinhibited

irritable.

Grandiosity ⊕

Insight = nil.

Ac Psychosis

3. Psychotic 251

2 ⊕

Acute hypomania 251

⊕

⊕

1/2

to P line

1 ⊕

Lab. Defect 1007

1 ⊕

to hospital 251

1 ⊕

(*Acute hypomania*)

Adm. report for
Serum Dopamine
19/10/2020

[Signature]

30

Professor
DR. MOHAMMAD IDREES
MBBS, MCPS, FCPS, CHPE
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Peshawar Medical College
Mercy Teaching Hospital
Ex-Professor of Psychiatry
Khyber Medical College
Khyber Teaching Hospital Peshawar
PMDC Reg. No: 875-N

عاطف زفری
Blue - Gostell

پروفیسر
ڈاکٹر محمد ادریس (ماہر دماغی امراض)
ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس، سی ایچ پی ای
کلینک: اکہرمیڈیکل سنٹر، ڈگری گارڈن، رامداس بازار، پشاور

77

15.09.2021

3
— Tab Tapiro 100mg
— — — — —

کاپی

7 RAD ↑

— Tab Mefenamic 100mg
— — — — —

کاپی

— Tab Rivastigmine 2mg
— — — — —

کاپی

5
1
1000

Not Valid for Legal Purposes

تعطیل بروز ہفتہ - اتوار

نمبر لینے اور معلومات کیلئے مغل شاہ میڈیکوز سے صرف بروز ہفتہ صبح 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

Cell: 0300-0911057, Ph: 091-2581472

Professor
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 Khyber Medical College
 Khyber Teaching Hospital Peshawar
 PMDC Reg. No: 875-N

عادل آفرین

(31)

پروفیسر
 ڈاکٹر محمد اوریس (ماہر دماغی امراض)
 ایم بی بی ایس، ایم سی بی ایس، ایف سی بی ایس، سی ایچ جی ای
 کلینک: اکبر میڈیکل سنٹر، ڈگری گارڈن، راولداس بازار، پشاور

P. S. No. 1057

Tab Keopro 50mg

 Tab Indosal 40mg

 Tab Valium 10mg

EPS
 Avoid sex
 at home for one
 week up
 tomorrow
 09.11.2021

۱۔ حق اللہ تعالیٰ

Not Valid for Legal Purposes

تعطیل بروز ہفتہ۔ اتوار

نمبر لینے اور معلومات کیلئے مغل شاہ میڈیکوز سے صرف بروز ہفتہ صبح 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

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Professor
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 MBBS, MCPS, FCPS, CHRE
 Professor of Psychiatry
 Peshawar Medical College
 Mercy Teaching Hospital
 Ex-Professor of Psychiatry
 Khyber Medical College
 Khyber Teaching Hospital Peshawar
 PMDC Reg. No: 875-N

عادل آفریدی

32
 3
 پروفیسر

ڈاکٹر محمد اورلیس (ماہر دماغی امراض)
 ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس، سی ایچ جی ای
 کلینک: اکبر میڈیکل سنٹر، ڈگری گارڈن، رامداس بازار، پشاور

3
 Tab Nirvanol 10mg
 (Nanzapine).
 (جاری)

7mg
 08.04.2021

1mg Naze 1mg
 (Clonazepam).
 (جاری)

1mg Clonazepam Depot.
 (جاری)
 200mg

1mg Clonazepam Auphase
 (جاری)
 100mg
 عوفیہ

Handwritten signature and notes on the right side of the page.

1mg Clonazepam
 (جاری)

Not Valid for Legal Purposes

تعطیل بروز ہفتہ - اتوار

نمبر لینے اور معلومات کیلئے مغل شاہ میڈیکل سروسز سے صرف بروز ہفتہ صبح 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

Cell: 0300-0911057, Ph: 091-2581472

33

Professor
DR. MOHAMMAD IDREES
MBBS, MCPS, FCPS, CHPE
Professor of Psychiatry
Peshawar Medical College
Mercy teaching Hospital
Ex-Professor of Psychiatry
Khyber Medical College
Khyber Teaching Hospital Peshawar
PMDC Reg. No: 875-N

عادل انوری، کراچی

Psh Dept

ڈاکٹر محمد اوریس (ماہر دماغی امراض)

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس ایچ پی ای
کلینک: اکبر میڈیکل سنٹر ڈگری گارڈن راولپنڈی بازار، پشاور

پروفیسر

15th Feb

23.11.2022

11/ Fluantol 40 mg

10/ 100 mg

(کاپی)

10/ 50 mg

(کاپی)

10/ 100 mg

(کاپی)

10/ 100 mg

Not Valid for Legal Purposes

تعطیل بروز ہفتہ اتوار

نمبر لینے اور معلومات کیلئے نیشنل شاہ میڈیکل سروس سے صرف بروز ہفتہ 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں۔

Cell:0300-0911057, Ph: 091-2581472

34

Professor
DR. MOHAMMAD IDREES
MBBS, MCPS, FCPS, CHPE
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Peshawar Medical College
Mercy Teaching Hospital
Ex-Professor of Psychiatry
Khyber Medical College
Khyber Teaching Hospital Peshawar
PMDC Reg. No: 875-N

پروفیسر
ڈاکٹر محمد ادریس (ماہر دماغی امراض)
ایم بی بی ایس ایم پی ایس ایف سی پی ایس ای ایچ جی ای
کلینک: اکبر میڈیکل سنٹر، ڈگری گارڈن، رانداس بازار، پشاور
2002

مادل آؤٹوں - کمال

ع = ک

BSc & MSc

Computer Science

۱۵۱ - ۱۵۸

Uk. Police Dept

Tab. Kampro 5mg

کاپی

Tab. Olanzapine 12/25

کاپی

۱۵۱

Tab. Indalol 40mg

کاپی

۱ - ۱
۴ - ۴
۸ - ۸

Not Valid for Legal Purposes

تعمیل بروز ہفتہ - اتوار

نمبر لینے اور معلومات کیلئے مغل شاہ میڈیکل سروس سے صرف بروز ہفتہ صبح 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

Cell: 0300-0911057. Ph: 091-2581472

Professor
DR. MOHAMMAD IDREES
MBBS, MCPS, FCPS, CHPE
Professor of Psychiatry
Peshawar Medical College
Merey Teaching Hospital
Ex-Professor of Psychiatry
Khyber Medical College
Khyber Teaching Hospital Peshawar
PMDC Reg. No: 875-N

عادل زفری
Raza - Gostak

(35)

پروفیسر
ڈاکٹر محمد اورلیس (ماہرومانی امراض)
ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس، سی ایچ پی ای
کیٹک، اکبر میڈیکل سنٹر، ڈگری گارڈن، رانداس بازار، پشاور

27

777

15.09.2021

Tab Tapiro 100mg

1 - 1

(کاپی)

? BMD ?

Tab Mucapine 100mg

1 - 1

(کاپی)

Tab Rivastigmine 2mg

1 - 1

(کاپی)

5

6 (1)

Not Valid for Legal Purposes

تعطیل بروز ہفتہ - اتوار

نمبر لینے اور معلومات کیلئے منسلک شاہ میڈیکوز سے صرف بروز ہفتہ 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

Cell: 0300-091107, Ph: 091-2581472

36

پروفیسر

Professor
DR. MOHAMMAD IDREES
MBBS, MCPS, FCPS, CHPE
Professor of Psychiatry
Peshawar Medical College
Mercy teaching Hospital
Ex-Professor of Psychiatry
Khyber Medical College
Khyber Teaching Hospital Peshawar
PMDC Reg. No: 875-N

عادل انوری کورٹ
Psha Depth

ڈاکٹر محمد ادریس (ماہر دماغی امراض)
ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس ایچ پی ای
کلینک: اکبر میڈیکل سنٹر ڈگری گارڈن رامداس بازار، پشاور

157 Febr

23/11/2020

147 Fluantol 50 mg
کلیئر

108 Kempra 500 mg
کلیئر

107 Dine plus 12 mg
کلیئر

(4)

Not Valid for Legal Purposes

تعطیل بروز ہفتہ اتوار

نمبر لینے اور معلومات کیلئے فیل شاہ میڈیکل سروسز سے صرف بروز ہفتہ صبح 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں۔

Cell: 0300-0911057, Pl: 091-2581472

37

پروفیسر

ڈاکٹر محمد ادریس (ماہر دماغی امراض)

ایم بی بی ایس، ایم بی بی ایس، ایف سی پی ایس، ایف سی ایچ پی ای

کلینک: اکبر میڈیکل سنٹر، ڈگری گارڈن، رانداس بازار، پشاور

21

ASSOR
MOHAMMAD IDREES
MBBS, MCPS, FCPS, CHPE
Professor of Psychiatry
Peshawar Medical College
Mercy Teaching Hospital
Ex-Professor of Psychiatry
Khyber Medical College
Khyber Teaching Hospital Peshawar
PMDC Reg. No: 875-N

عبدالرزاق

M. A. C. M. T. H.

100 mg 10 p.c.s

Cost

100 mg M. A. C. M. T. H.

Stamp

Cost

100 mg Rivotril

Stamp

1/2 - 1/2

1/2 - 0

Admission to have
rest at home
for three weeks

Not Valid for Legal Purposes

تعمیل بروز
زہفتہ اتوار

نمبر لینے اور معلومات کیلئے مغل شاہ میڈیکل سروس سے صرف بروز ہفتہ 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

Cell: 0300-0911057, Ph: 091-258147

72

essor

M. MOHAMMAD IDREES

MBBS, MCPS, FCPS, CHPE

Professor of Psychiatry

Peshawar Medical College

Mercy Teaching Hospital

Ex-Professor of Psychiatry

Khyber Medical College

Khyber Teaching Hospital Peshawar

PMDC Reg. No: 875-N

(38)

پروفیسر

ڈاکٹر محمد ادریس (ماہر دماغی امراض)

ایم بی بی ایس ایم سی بی ایس ایف سی بی ایس سی ایچ پی ای

کلیٹک: انٹرنیشنل سٹریٹ، ڈگری گارڈن، راولپنڈی بازار، پشاور

مادری آفریون، کمالی

En: KSC

BSL court

Computer Science

UK. Police Deptt

151-152

Prof. Kamran 5000

(جاری)

Prof. Nazim 12/25

(جاری)

(38)

Prof. Iqbal 4000

(جاری)

1 - 1
4 - 4
8

Not Valid for Legal Purposes

تعطیل بروز ہفتہ - اتوار

نمبر لینے اور معلومات کیلئے مغل شاہ میڈیکوز سے صرف بروز ہفتہ صبح 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

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 Mercy Teaching Hospital
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 Khyber Medical College
 Khyber Teaching Hospital Peshawar
 PMDC Reg. No: 875-N

39

ڈاکٹر محمد اوریس (ماہر دماغی امراض)
 ایم بی بی ایس، ایم سی بی ایس، ایف سی بی ایس، سی ایچ بی ای
 کلینک: اکبر میڈیکل سنٹر، ڈگری گارڈن، رائف اس بازار، پشاور

عادل آفریدی

Tab KC 100 mg 5 cap
 1 - 1 - 1
 Tab Indosal 40 mg
 1 - 1 - 1
 Tab Valium 10 mg
 1 - 1/2
 1 - 1/2

Avoid sex can
 at home for one
 week cap
 tomorrow
 09/12/2021

قلمی نسخہ

Not Valid for Legal Purposes

تعطیل بروز ہفتہ - اتوار

نمبر لینے اور معلومات کیلئے مٹل شاہ میڈیکوز سے صرف بروز ہفتہ صبح 10 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

Cell: 0300-0911057, Ph: 091-2581472

Professor
DR. MOHAMMAD IDREES
 MBBS, MCPS, FCPS, CHPE
 Professor of Psychiatry
 Peshawar Medical College
 Mercy Teaching Hospital
 Ex-Professor of Psychiatry
 Khyber Medical College
 Khyber Teaching Hospital Peshawar
 PMDC Reg. No: 875-N

عادل آفریدی

(40)

پروفیسر
 ڈاکٹر محمد ادریس (ماہر نفسی امراض)
 ایم بی بی ایس، ایم سی بی ایس، ایف سی بی ایس، سی ایچ جی بی ای
 کلینک، اکبر میڈیکل سنٹر، ڈگری گارڈن، رانداس بازار، پشاور

3 Tab Nizvanol 10mg
 (Olanzapine)

7mg
 08.04.2021

(کری)

1mg Naze 1mg
 (Clonazepam)

(کری)

1mg clonazepam Depot

1mg - 2mg - 5mg - 10mg

1mg clonazepam Auphae 100mg

1mg - 2mg - 5mg - 10mg

1mg clonazepam 100mg (کری)

Not Valid for Legal Purpose

تعطیل بروز ہفتہ - اتوار

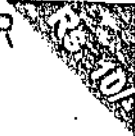
نمبر لینے اور معلومات کیلئے مغل شاہ میڈیکل سروسز سے صرف بروز ہفتہ صبح 11 بجے تا دوپہر 2 بجے مندرجہ ذیل نمبرز پر رابطہ کریں

Cell: 0300-091057, Ph: 091-2581472

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SERVICES HOSPITAL PESHAWAR
GOVERNMENT OF KPK
OPD REGISTRATION



Name ADIL AFRIDI Age 27 Sex MALE

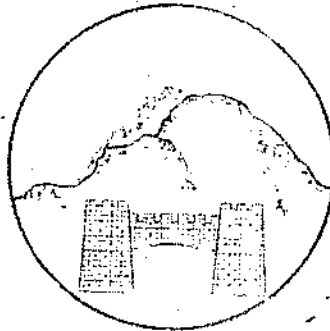
Department GENERAL OPD Address PESHAWAR

Hospital Yearly No. 6266-22 Dated 10-01-2022

History

R/-

Clinical Examination



Provisional Diagnosis

Investigations

Doctor on Duty _____ Doctor's Signature _____

(42)

"B"

FINAL SHOW CAUSE NOTICE

I Superintendent of Police, Headquarters, Capital City Police Peshawar, as competent authority, under the provision of Police Disciplinary Rules 1975 do hereby serve upon you, FC Adil Afridi No. 3628 the final show cause notice.

The Enquiry in the matter was conducted by, DSP Hqrs, after completion of departmental proceedings, has recommended ex-parte action to be taken against you and **Major Punishment** to awarded to you.

And whereas, the undersigned is satisfied that you, FC Adil Afridi No. 3628 deserve the punishment in the light of the above said enquiry report.

And as competent authority, has decided to impose upon you the penalty of minor/major punishment under Police Disciplinary Rules 1975.

1. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

2. If no reply to this notice is received within 7 days of its receipt, in normal course of circumstances, it shall, be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.


SUPERINTENDENT OF POLICE,
HEADQUARTERS, PESHAWAR

No. S015/PA, SP/HQrs: dated Peshawar the 27-11 /2023.

Copy to official concerned

پیشہ ورانہ تعلیم اور ترقی کے شعبے

تعمیراتی
تعمیراتی

ذکر کردہ سہ ماہی کے لئے درخواستیں جمع کروانے کے لئے
ذکر کردہ سہ ماہی کے لئے درخواستیں جمع کروانے کے لئے
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ذکر کردہ سہ ماہی کے لئے درخواستیں جمع کروانے کے لئے

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ذکر کردہ سہ ماہی کے لئے درخواستیں جمع کروانے کے لئے
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ذکر کردہ سہ ماہی کے لئے درخواستیں جمع کروانے کے لئے



ذکر کردہ سہ ماہی کے لئے درخواستیں جمع کروانے کے لئے

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C

ORDER

This order will dispose of departmental enquiry initiated against FC Adil Afridi 3628. It was reported by DSP HQrs vide letter No. 2981/PA dated 23.08.2023 that FC Adil Afridi of light duty has been found absent continuously since 21.02.2023 vide DD No. 23.

2. Resultantly, Charge Sheet was issued vide this office Endstt No. 2381/PA dated 12.09.2023 and DSP Hqrs was appointed as Enquiry Officer.
3. The Enquiry officer reported that several notices were issued vide Nos. 1800/R dated 20.10.2023, 1870/R dated 06.11.2023, 1893/R dated 09.11.2023 but the official didn't appear to acknowledge his charge sheet. In addition, several other notices were sent to his home address through local police of PS AMJS vide Nos. 1819, dated 24.10.2023 1931, dated 15.11.2023, 1951 dated 17.11.2023. That, despite all these notices the official failed to appear before the Enquiry Office. However, his brother namely Syed Nawaz reported that his brother Adil is suffering from psychiatric diseases and is undertreatment in Islamabad. That his brother will appear before the E.O as soon as he recovers.
4. The enquiry officer recommended that, based on his 08 months long absence which is still continuing, major punishment be awarded to him as an Ex-parte.
5. In this regard the MASI Police Lines reported in his special report that the official is once again absent. His absence reports are mentioned hereunder:-

DETAILS OF ABSENCE OF FC ADIL AFRIDI 3628			
S. No	Absence DD & Date	Arrival DD & Date	Total Duration
1	23/21.02.2023	19/02.01.2024	327 days
2.	30/09.02.2024	Till date	4 days
Total Absence			331 days

6. That final show cause notice was issued vide this office endst No. 5015/PA dated 27.11.2023, and was served upon him through local Police of PS AMJS vide this office notice No. 5017. The official received and didn't submit his reply to till date.
9. Hence based on the foregoing, FC Adil Afridi 3628 did not appear even for personal hearing, neither before the E.O nor before the undersigned. He is found inefficient, disinterested in the esteemed Police Service, disobedient and have been ceased to be an efficient. In light of the all above reasons, a major Punishment is imposed upon him as an ex-parte and he is Removed from Service. The total period of absence for 331 days treated as without pay.

SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR

OB No. 322 /

Dated 16/02 /2024

10/01/2024

CITY POLICE OFFICER (CCPO),
Pakhtunkhwa, Peshawar.

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D

DEPARTMENTAL APPEAL / REPRESENTATION AGAINST ISSUANCE OF
ORDER NO. 17/PA/SP DATED 13.02.2024 08.06.2023, WHEREBY
THE APPELLANT HAS BEEN REMOVED FROM SERVICE ON EX-PARTE
BASIS, WITH IMMEDIATE EFFECT.

Prayer: In acceptance of this Departmental Appeal /
Representation, the above mentioned ex-parte order of
removal may please be set aside being against the Law,
and harsh in nature in consequence whereof the
Appellant may please be reinstated in service with all back
payments / consequential benefits, with such other relief,
may deem fit in the circumstances of the case, may also
be granted.

Respected Sir

MAJIL AFRIDI, Ex-Constable, (3628), submit instant
Appeal / Representation for your honors sympathetic and benevolent
consideration, as under:

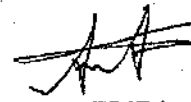
1. That, Appellant was inducted in the service of Police Department as
Constable in the year 17.03.2017, by the Competent Authority.
2. That, Appellant performed meritorious services during his entire
career and was lastly posted at Police Station Rehman Baba,
Peshawar.
3. That, during the course of employment as Constable, Charge Sheet
dated 2022 was issued in the name of the Appellant, which
was never handed over to him.

4. That, despite having knowledge of ailment of the Appellant, Ex-parte proceedings were initiated and concluded against the Appellant.
5. That, no enquiry, either fact finding, formal or regular was ever conducted by the Department against the Appellant nor any procedure as mentioned in the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 was ever adopted.
6. That, Appellant was not allowed to clarify his stance nor any chance of personal hearing was afforded to the Appellant.
7. That, the removal Order is illegal, unlawful, void and ineffective.
8. That, same is against the principles of natural justice, also.
9. That, prior to issuance of Removal Order, no Final Show Cause Notice was served upon the Appellant nor the Enquiry Proceedings / Report was handed over to the Appellant.
10. That, no Formal / Regular Inquiry was conducted by the Department, moreover it is now well established principle of law that where the Department proposed to inflict major punishment upon an employee, the Regular Inquiry, to that effect, is must and necessary.
11. That, the subject mentioned Order is based on malafide, harsh in nature and has been passed in arbitrary manner.
12. That, allegations as levelled and punishment as imposed seems to be based on surmises and conjectures.
13. That, Appellant has been condemned unheard hence he wishes to be heard in person by the Competent Authority.
14. That, the Appellant has more than 6 years 3 Months of continuous and unblemished service with the Department wherein he was never / ever been charge sheeted nor any disciplinary action was ever initiated against him.

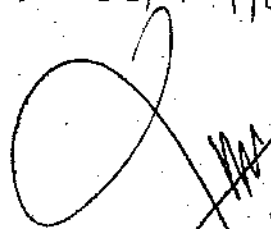
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It is, therefore, requested that subject Appeal be accepted as prayed for.

Appellant / Applicant

 0310-0918526
ADIL AFRIDI,
Ex-Constable, (3628),
Peshawar.

Dated 29/02/2024


11/02/24

2. The DSP HQRs CCP Peshawar.
3. AD-II, CCP Peshawar.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

**WAKALATNAMA
(Power Of Attorney)**

Adil Afridi..... (Petitioner)
(Plaintiff)
(Applicant)
(Appellant)
(Complainant)
(Decree Holder)

VERSUS

Govt of KP & others (Respondent)
(Defendant)
(Accused)
(Judgment Debtor)

I/ We, _____ The undersigned _____ in the above noted _____ do hereby appoint **Mr. Akhuzada Ahmad Saeed, Bilal Ahmad Kaka Zai, Farooq Shah and Sohail Khan**, Advocate to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our counsel in the above noted case and with the authority to engage /appoint an other Advocate/Counsel on my/our behalf in my/our case and that my/our counsel will not appear whenever a strike call is made by the PBA, PHCBA, KP Bar Council, Pakistan Bar Council or by any other representative body of the lawyers' community, Furthermore, my/our counsel shall not be liable for any acts on my/our behalf, if I/we have furnished an incorrect information or mis-statement and that my/our counsel shall not be liable for any disciplinary action in case of his default in the aforesaid delegated authority, matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/Counsel at my/our matter.

Attested & Accepted By.

Signature of Executants

Bilal
**Bilal Ahmad Kaka Zai,
(Advocate Supreme Court)**

Akhuzada Ahmad Saeed (bc-11-1885)
Advocate High Court
Office: 15-B, Haroon Mansion, Khyber Bazar,
Peshawar Cell No.0333-2902529
CNIC No. 15705-5473448-3

Farooq
Farooq Shah (Advocate High Court)
&

Sohail Khan (Advocate High Court)