


FORM OF ORDER SHEET

Court of _____

Appeal No. 1251/2024

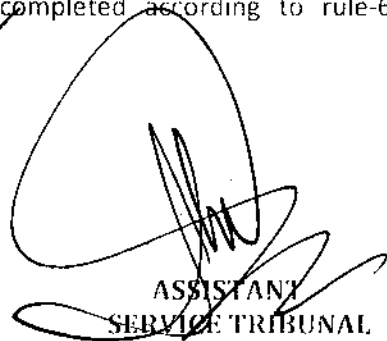
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	3/9/2024	<p>The appeal of Mr. Abdul Hamid presented today by Mr. Abdul Samad Durrani Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 11/9/2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Abdul Hamid received today i.e on 22-8-2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1 ✓ Departmental Appeal is not attached. ✓
- 2 ✓ Memorandum of appeal is not signed by appellant. ✓
- 3 ✓ Checklist is not attached with the appeal. ✓
- 4 ✓ Appeal has not been flagged/marked with annexure marks. ✓
- 5 ✓ Certificate be given to the effect that appellant has not been filed any service appeal earlier on the subject matter before this Tribunal. ✓
- 6 ✓ According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no 1, 2 & 5 are un-necessary/improper parties, in light of 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. ✓
- 7 ✓ Address of appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974. ✓

No. 656 /S.T.

DT. 2/9 /2024



ASSISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Abdul Samad Durrani Adv. Pesh.

*All objections are removed
and file may be resubmitted*

~~ASD~~
03/09/2024

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Abdul Hamid VS Government CCPO & Another

S#	CONTENTS	YES	NO
1	This Appeal has been presented by <u>Abdul Samad Durani Adv</u>	✓	
2	Whether counsel / appellant/ respondent/ deponent have signed the requisite document?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent oath commissioner?	✓	
8	Whether Appeal / Annexures are properly paged?	✓	
9	Whether Certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/ clear?	✓	
13	Whether copy of appeal is delivered to AG/ DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by Petitioner/ Appellant / Respondents?	✓	
15	Whether number of referred cases given are correct?	✓	
16	Whether appeal contains cutting / overwriting?		✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this Court?	✓	
19	Whether requisite number of spare copies are attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether security and process fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, Notice along with copy of Appeal and annexures has been sent to Respondents? On _____	✓	
26	Whether copies of comments / reply / rejoinder submitted? On _____		
27	Whether copies of comments/ reply/ rejoinder provided to opposite party? On _____		

It is certified that formalities /documentations as required in the above table, have been fulfilled.

Name:- Abdul Samad Durani Advocate

Signature:- [Signature]

Dated:- 03/09/2024

Capital City Police Peshawar

Name: Abdul Hamid

S.No: 7760

Rank: Constable

Belt No: 7760



Valid upto: 31-12-2023

Issuing Authority

Khyber Pakhtunkhwa Police

C.N.I.C. No: 17301-0344672-1

Height: 5-7 Blood Group: Nil

Personal Contact # : 0330-5422837

1. This Card is non transferable and is the property of Govt. of Khyber Pakhtunkhwa
2. In the event of loss report immediately to nearest Police Station and the issuing authority giving original number of the card.
3. Finder of the lost card is requested to deposit the card to the nearest Police Station.

Verification Contact No:
091-5284953





National Identity Card

PAKISTAN

ISLAMIC REPUBLIC OF PAKISTAN

Abdul Hamid

Father Name
Mishal Khan

Handwritten initials

Gender: M
Country of Issue: Pakistan

Identity Number: 17301-034672-1
Date of Birth: 20.11.1993

Date of Issue: 15.07.2024

Date of Expiry: 15.07.2034

Holder's Signature



Handwritten number 272

Registrar General of Pakistan

سجل برائے پاکستان کیرہ، عظیمی قریبی، چنار



101061514537

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. _____/2024

Abdul Hamid, Constable Belt #. 7760 Section Mamuzai.

(Appellant)

VERSUS

Govt Khyber Pakhtunkhwa, through Chief Secretary, Khyber
Pakhtunkhwa Peshawar and others.

(Respondents)

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Through

عبد حميد
Appellant

ABDUL SAMAD DURRANI

Advocate High Court

BC-12-3479

Office: A-13, Nasir

Manson(Chinar Buildig) Shuba

Bazar, Peshawar City

CNIC # 17301-9592293-5

Email: a.samaddurraniadv@gmail.com

Cell # 0346-9092470

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

①
Khyber Pakhtunkhwa
Service Tribunal

Diary No. 15122

Dated 22/8/24

Appeal No. 1251/2024

Abdul Hamid, Constable Belt #. 7760 Section Mamuzai, Son
Of Misal Khan Resident of Sher Kerra, Mohallah Gharri
Qamar Gul, Tehsil & District Peshawar.

(Appellant)

VERSUS

1. Govt of Khyber Pakhtunkhwa through Chief Secretary
Khyber Pakhtunkhwa Civil Secretariat Peshawar.
2. Inspector General of Police Officer, Khyber Pakhtunkhwa,
Peshawar.
3. Capital City Police Officer Peshawar.
4. Superintendent of Police Saddar Division CCP, Peshawar.
5. Deputy Commissioner Peshawar.

(Respondents)

**APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE ORDER
DATED 13.05.2024, WHEREBY THE APPEAL
OF THE APPELLANT WAS DISMISSED
WHICH WAS FILED AGAINST THE
IMPUGNED ORDER DATED: 19.07.2022 VIDE
WHICH THE APPELLANT HAS BEEN
AWARDED MAJOR PUNISHMENT OF,
DISMISSAL FROM SERVICE.**

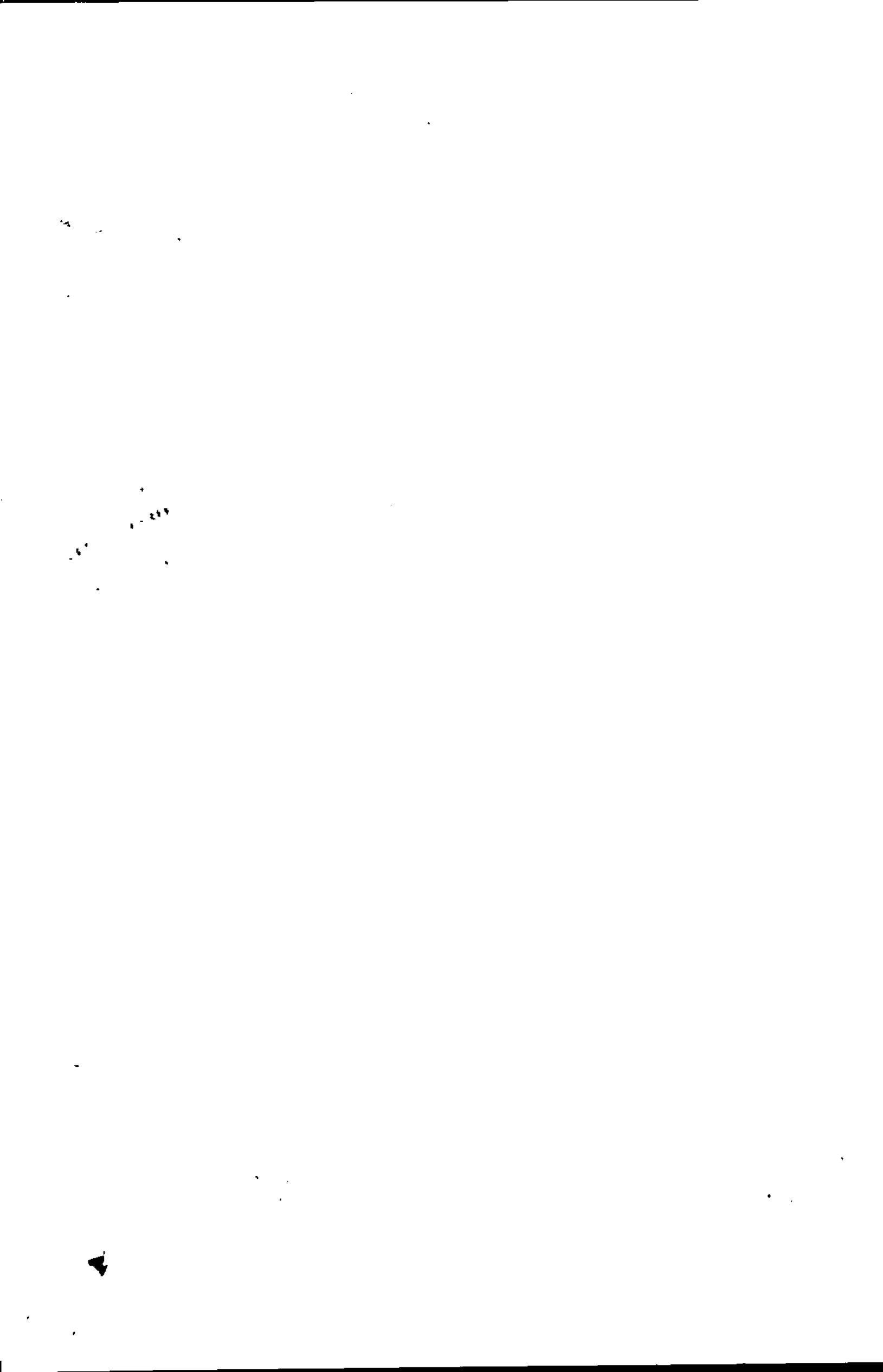
Filed to-day
Registrar
22/8/24

Prayer in Appeal: -

On acceptance of this appeal both impugned
Office Order No. 2785/PA, dated 19.07.2022 &
impugned Office Order No. 3406-12/PA/CCP,
Dated: 13.05.2024 may please be set-aside and
the appellant may please be re-instated in
service with full back wages and benefits of
service.

Respectfully Submitted:

Compendium of the facts from which the present appeal
arises, are as under:-



①

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 1251/2024

(P.S: Hassan Khed)

Abdul Hamid, Constable Belt #. 7760 Section Mamuzai, Son
Of Misal Khan Resident of Sher Kerra, Mohallah Gharri
Qamar Gul, Tehsil & District Peshawar.

(Appellant)

VERSUS

1. Capital City Police Officer Peshawar.
2. Superintendent of Police Saddar Division CCP, Peshawar.

(Respondents)

APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE ORDER
DATED 13.05.2024, WHEREBY THE APPEAL
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WHICH WAS FILED AGAINST THE
IMPUGNED ORDER DATED: 19.07.2022 VIDE
WHICH THE APPELLANT HAS BEEN
AWARDED MAJOR PUNISHMENT OF,
DISMISSAL FROM SERVICE.

Re-submitted to -day
and filed.
Registrar
3/9/24.

Prayer in Appeal: -

On acceptance of this appeal both impugned Office Order No. 2785/PA, dated 19.07.2022 & impugned Office Order No. 3406-12/PA/CCP, Dated: 13.05.2024 may please be set-aside and the appellant may please be re-instated in service with full back wages and benefits of service.

Respectfully Submitted:

Compendium of the facts from which the present appeal arises, are as under:-

1. That the appellant was initially appointed as Sepoy in Levy Vide Office Order No. 2696-2704-APA(FR), Dated: 15.01.2015 at serial No. 12 of the said order.(Copy of Appointment Order Vide Office Order No. 2696-2704-APA(FR), Dated: 15.01.2015 is attached as Annexure "A")
2. That ever since his appointment, the appellant was performing his duties as assigned to him with zeal and devotion and there was no complaint whatsoever regarding his performance. It is pertinent to mention here that during his entire service, the performance of the appellant remained commendable.
3. That the appellant was got ailment in the year 2021 and diagnosis **Pulmonary Tuberculosis (TB)** for which the doctors advised bed rest to appellant in this regard the appellant informed his high ups.(Copy of Medical Prescription/ Record is attached as Annexure "B")
4. That enquiry proceeding regarding the absence of appellant was initiated without informing the appellant furthermore, the appellant was not served with the charge sheet and the proceeding along with the enquiry report No. 1722/BADHBER Circle, Dated: 04.07.2022 is false and mala-fide submitted. It is pertinent to mention here that the final show cause notice was served upon the appellant which was duly replied along with the medical reports of the appellant but the inquiry officer totally negate the version of the appellant and passed the impugned order vide Office Order No. 2785/PA, Dated: 19.07.2022 vide which the appellant was awarded a major penalty of dismissal from service illegally.(Copies of Charge Sheet, Final Show cause Notice and impugned Office Order No. 2785/PA, Dated: 19.07.2022 are attached as Annexure "C", "D" & "E")

5. That felt aggrieved from the impugned order of the enquiry officer the appellant filed a departmental appeal before the authority concerned. It is pertinent to mention here that during the departmental appeal proceedings the appellant was abducted by the Police Officials Police Station Mattani and Officials of CTD from the appellant house on 12.10.2022 and the appellant was remained in their illegal custody till 02.05.2024 and on the date mentioned later above the appellant was released from their illegal confinement and directed the appellant for keeping his mouth mum. It is also pertinent to mention here that the uncle of the appellant namely **Wazir Hussain** filed a **Writ Petition, WP (HCP) No. 4115-P/2022, Dated: 22.10.2022** against the illegal confinement of the appellant before the August Peshawar High Court Peshawar. (Copy of the WP(HCP) No. 4115-P/2022, Dated: 22.10.2022 & Order are attached as Annexure "F" & "G")
6. That after releasing from the illegal, unlawful custody the appellant once again diagnose TB for the reason earlier no proper treatment was provided to the appellant during the illegal, unlawful custody and for the treatment of the same the appellant visited Kuwait Teaching Hospital Peshawar wherein he was remain admitted till 11.05.2024 and appellant was advised complete bed rest. It is pertinent to mention here that after feeling little bit well and improvement on 27.07.2024 the appellant approached to the Respondent No. 3 for taking the information in respect of the departmental appeal so filed by the appellant already mentioned above wherein the appellant was handed over with impugned Office Order No. 3406-12/PA/CCP, Dated: 13.05.2024 vide which respondent No. 3 dismissed the departmental appeal of the appellant and maintain the order of the enquiry officer / Respondent No. 4 dated: 19.07.2022. (Copy of the Impugned Order No. 3406-12/PA/CCP, Dated: 13.05.2024 Of Respondent No. 3 attached as annexure "H")

7. That the appellant having no other adequate remedy but to challenge the validity of the impugned Office Order No. 2785/PA, Dated: 19.07.2022 & Office Order No. 3406-12/PA/CCP, Dated: 13.05.2024 by filing the instant appeal on the following grounds amongst others:-

Grounds of Appeal:

- A. That the appellant has not been treated in accordance with law, and the impugned orders were passed in a haphazard manner.
- B. That the impugned Notification is illegal, void abinitio, with mala-fide intentions, without lawful authority, jurisdiction, and ineffective upon the rights of the appellant, hence liable to be cancelled.
- C. That the respondents while passing the impugned orders totally ignored the prescribed law and rules and passed the impugned orders which are liable to be set at naught.
- D. That no proper opportunity of hearing was provided to the appellant and passed the impugned orders which gross violation of the Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973, hence the impugned orders are not tenable in the eyes of law and are liable to be set aside.
- E. That punishments so awarded to the appellant are against the fundamental rights guaranteed by the constitution of Islamic Republic of Pakistan, 1973 and other laws for the time being enforced hence the both orders of the respondents may liable to be set aside.



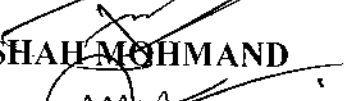

F. That the appellant has performed his duty with great zeal and devotion, hard work and till date no complaint of the appellant has registered to the respondents, in this regard guidance may be taken from the ACR's of the appellant.

G. That the other grounds will be raised, if any, at the time of arguments, with the permission of this Honorable Tribunal.

It is, therefore, prayed that on acceptance of this appeal the impugned Office Order No. 2785/PA, dated 19.07.2022 & impugned Office Order No. 3406-12/PA/CCP, Dated: 13.05.2024 may please be set-aside/Cancelled and the appellant may please be restored/ reinstated in service with full back wages and benefits of service.


عبد الحميد
Appellant

Through


ABDUL SAMAD DURRANI

NASIR KHAN ABA KHEL

JOHAR SHAH MOHMAND
&

MUHAMMAD BILAL ZARIN
Advocates High Court

Certificate:

As per the information of my client no such like service appeal in the subject matter has been filed before this Honorable Court.


ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. _____/2024

Abdul Hamid, Constable Belt #. 7760 Section Mamuzai.

(Appellant)

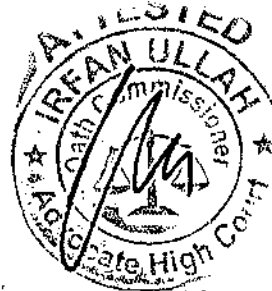
VERSUS

*Govt of Khyber Pakhtunkhwa through Chief Secretary Khyber
Pakhtunkhwa Civil Secretariat Peshawar & Others.*

(Respondents)

AFFIDAVIT

I, Abdul Hamid, Constable Belt # 7760 Section Mamuzai, Son Of Misal Khan Resident of Sher Kerra, Mohallah Gharri Qamar Gul, Tehsil & District Peshawar, do hereby solemnly affirm and declare that the contents of the above appeal are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honorable Tribunal.



عبد الحميد
DEPONENT

17301-0344872-1

19.8.22

**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Appeal No. _____/2024

Abdul Hamid, Constable-Belt #. 7760 Section Mamuzai.
(Appellant)

VERSUS

Capital City Police Officer Peshawar and Another.
(Respondents)

APPLICATION FOR CONDONATION OF DELAY


Respectfully Submitted:

1. *That the appellant has filed the accompanied service appeal in which no date has been fixed so far.*
2. *That all the grounds raise in the main appeal may kindly be considered as part and parcel of the instant application.*
3. *That as mentioned in the main appeal that the appellant was got ill and diagnose with the TB and after releasing from the illegal custody the appellant once again diagnose with the TB for the reason earlier no proper treatment was provided to the appellant during the illegal custody and for the treatment of the same the appellant visited Kuwait Teaching Hospital Peshawar wherein he was remain admitted till 11.05.2024 and on the same the appellant was advised complete bed rest. It is pertinent to mention here that after feeling little bit well and improvement on 27.07.2024 the appellant approached to the Respondent No. 3 for taking the information in respect of the departmental appeal so filed by the appellant already mentioned above wherein the appellant was handed over with impugned order dated: 13.05.2024 vide which respondent No. 3 dismissed the departmental appeal of the appellant and maintain the order of the enquiry officer / Respondent No. 4 dated: 19.07.2022 hence the appellant got knowledge of the same.*

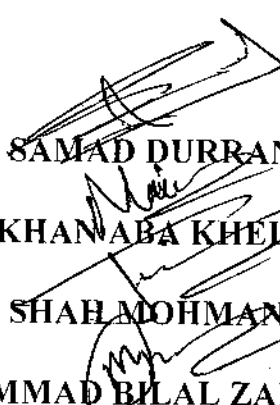
8

4. That the delay in filling the instant appeal is not intentionally but due to the reason mentioned above and the same may kindly be condoned in favor of the applicant/appellant.
5. That, valuable rights of the applicant/appellant are involved in the case hence the instant application may be allowed, in best interest of the justice.

It is, therefore, prayed that on acceptance of this application the condonation caused in filling of appeal may kindly be condoned in favor of the applicant/appellant.


Applicant/ Appellant

Through


ABDUL SAMAD DURRANI
NASIR KHAN ABA KHEL
JOHAR SHAH MOHMAND
&
MUHAMMAD BILAL ZARIN
Advocates High Court

AFFIDAVIT

I, Abdul Hamid, Constable Belt #. 7760 Section Mamuzai, Son Of Misal Khan Resident of Sher Kerra, Mohallah Gharri Qamar Gul, Tehsil & District Peshawar, do hereby solemnly affirm and declare that the contents of the above appeal as well as the application are true and correct to the best of my knowledge and belief and that nothing has been kept back or concealed from this Honourable Tribunal.




Deponent

17301-0344672-1

OFFICE OF THE
DEPUTY COMMISSIONER/POLITICAL AGENT
FR PESHAWAR

Annexure "A"

(9)

OFFICE ORDER. No. 2696-2704-APA(FR) Dated Peshawar the 15/01/2015

Consequent upon the failure to report for duty of the levy personnels which were appointed vide this office order No.APA(FR)/2202-09 dated 17-11-2014, the following individuals who are next on merit are hereby appointed as Levy Sepoys in BPS-05 (5400-260-13200) with usual allowances as admissible under the rules on the terms and conditions given in para-2 below.

S.No	Name with parentage	Tribe
1	Abid Khan S/O Nawaz Khan	Hassan Khel
2	Danish Wali S/O Muhammad Wali	Asho Khel
3	Iqbal Hussain S/O Javed Hussain	Asho Khel
4	Rizwan Khan S/O Gul Wass Khan	Asho Khel
5	Fazal Subhan S/O Gul Jan	Asho Khel
6	Iqrar Ahmad S/O Gul Daraz	Janakor
7	Muhammad Asad S/O Kala Khan	Janakor
8	Shah Faisal S/O Gul Madeen	Asho Khel
9	Waheed ur Rehman S/O Amal Zada	Asho Khel
10	Bakht Baidar S/O Sarfaraz	Asho Khel
11	Rahmat Ullah S/O Manzoor Khan	Asho Khel
12	Abdul Hameed S/O Missal Khan	Asho Khel
13	Khial Hassan S/O Raja Hassan	Asho Khel
14	Muhammad Irfan S/O Khan Afzal	Janakor
15	Said Nawaz S/O Qasim Khan	Bora Pastawani
16	Rasim Khan S/O Kachkol Khan	Hassan Khel
17	Asmat Ullah S/O Arshad Ahmad	Hassan Khel
18	Muhammad Rizwan S/O Manawar Khan	Hassan Khel
19	Noor Zareen S/O Shah Zareen	Asho Khel
20	Israr Khan S/O Musa Khan	Hassan Khel
21	Gul Imran S/O Zaledar Khan	Asho Khel
22	Said Ali Shah S/O Momin Shah	Asho Khel
23	Asif Khan S/O Tariq Muhammad	Bora jawaki
24	Ashif S/O Wazir Aslam	Asho Khel
25	Samandar Khan S/O Sikandar Khan	Asho Khel
26	Rasheed Khan S/O Hasham Gul	Asho Khel
27	Farman Ullah S/O Sher Aslam	Asho Khel

Terms & Conditions:

1. The post which is being offered has been sanctioned by the Government is temporary but is likely to be extended further. Employment is purely temporary and services may be terminated at one month's notice without any reason being assigned at any time irrespective of the fact that they are holding a post other than the one to which they were originally recruited or on the payment of one month salary in lieu of the notice.
2. They have to join duty at their own expenses.
3. The appointee will be governed by such rules and regulation/policy which may be issued/prescribed by the Government from time to time.
4. In case they wish to resign at anytime, one month prior notice will be necessary or in lieu thereof one month pay be forfeited.

[Handwritten Signature]

[Handwritten Signature]


They will be governed by such rules and orders related to leave, travelling allowance, medical attendance, pay etc-as may be issued by the Government for the category of Government Servants to which they will belong.


6. They will undergo & qualify pre-induction training whenever arranged. Failure in training will result in termination of service.
7. The individuals as per list should submit their arrival reports within 15 days from date of issuance of this office order otherwise their appointment orders will be cancelled.


Deputy Commissioner/
Political Agent FR Peshawar

C.C to the:-

1. Secretary Law & order Deptt: FATA Secretariat Peshawar.
2. Commissioner Peshawar Division Peshawar.
3. Deputy Secretary Govt: of Pakistan, States & Frontier Regions Division Islamabad.
4. Deputy Secretary (N) Law & Order Deptt: FATA Secretariat Peshawar.
5. AGPR, Sub-Office Peshawar.
6. S.O (LK&B) SAFRON Division Islamabad.
7. S.O (N) Law & Order Deptt: FATA Secretariat Peshawar.
8. S.O (B&A) FATA Home & TA Deptt: Peshawar.
9. Officials Concerned.


Deputy Commissioner/
Political Agent FR Peshawar


~~Assistant Political
Agent (F.S) Peshawar~~

AHestak


Government of Khyber Pakhtunkhwa
Accountant General Khyber Pakhtunkhwa, Peshawar
Monthly Salary Statement (August-2021)



11

Personal Information of Mr ABDAL HAMID d/w/s of MISHAL KHAN

Personnel Number: 50212744 CNIC: 1730103446721 NTN:
 Date of Birth: 10.11.1993 Entry into Govt. Service: 19.01.2015 Length of Service: 06 Years 07 Months 014 Days

Employment Category: Active Temporary

Designation: CONSTABLE 30877518-GOVERNMENT OF KHYBER PAKH

DDO Code: PR8108-

Payroll Section: 006

GPF Section: 002

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance: 69,519.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil - BPS: 07

Pay Stage: 5

Wage type	Amount	Wage type	Amount
0001 Basic Pay	14,040.00	1004 House Rent Allow 45% KP21	4,968.00
1210 Convey Allowance 2005	1,932.00	1300 Medical Allowance	1,500.00
1528 Unattractive Area Allow	75.00	1547 Ration Allowance	681.00
1567 Washing Allowance	150.00	1646 Constabulary R Allowance	300.00
1902 Special Incentive Allownce	775.00	2168 Fixed Daily Allowance	2,730.00
2211 Adhoc Relief All 2016 10%	943.00	2224 Adhoc Relief All 2017 10%	1,404.00
2247 Adhoc Relief All 2018 10%	1,404.00	2264 Adhoc Relief All 2019 10%	1,404.00
2309 Adhoc Relief All 2021 10%	1,404.00	2314 Risk Allow Police - 2021	5,754.00

Deductions - General

Wage type	Amount	Wage type	Amount
3007 GPF Subscription	-1,010.00	3530 Police wel:Fud BS-1 to 18	-281.00
3534 R. Ben & Death Comp Fresh	-450.00	5801 Adj Basic Pay	-15,247.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till AUG-2021: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 39,464.00 Deductions: (Rs.): -16,988.00 Net Pay: (Rs.): 22,476.00

Payee Name: ABDAL HAMID

Account Number: 0010033972030018

Bank Details: ALLIED BANK LIMITED, 250307 G.T. Rd. Peshawar City. G.T. Rd. Peshawar City., Peshawar

Leaves: Opening Balance: Aailed: Eamok: Balance:

Permanent Address:

City: PESH

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: hameedafd93@gmail.com

Attended

OFFICE OF THE
ASSISTANT POLITICAL AGENT
FR PESHAWAR

12

No. 6468 / APA (FR) / 1970
Dated Peshawar the 21/9/70

To

The Deputy Commissioner
Peshawar

Subject: APPLICATION FOR THE GRANT OF ARM LICENSE.

R/Sir,

Enclosed find herewith an application in respect of Levy Sepoy Abdul Hamid S/O
Misal Khan r/o Bashi Khel, Asho Khel FR Peshawar for the grant of NPB arm license for favor
of further necessary action, please.

Encl: As above.


ASSISTANT POLITICAL AGENT
FR PESHAWAR

Attested


NADRA

Scanning Date 18/04/2022

GM TY 29/6
(FIP)

13

HQ National Database and
Registration Authority
(Public Service Directorate)
PHQ Building, 30, 5th Floor,
Mairwa Area, G-10/4,
Islamabad
Tel. 051-9108131
PSD/Verisys/1/17
23rd June, 2017

To: All Customers
Cc: Chairman Sectt
DG Operations


Subject: Verisys Service to Facilitate CNIC Verifications of Amputated Citizens

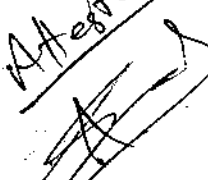
1. Lahore High Court (W.P 8999/2017) desires to facilitate those customers who are unable to get their biometric verification from NADRA due to damage to their hand because of full amputation/partial amputation/bandaged fingers/skin problem/worn out fingerprints. Biometric based verification is one of the successful tools for the verifications besides other options like Verisys.

2. In order to facilitate all Pakistani citizens holding CNIC but encountering problem due to figure prints issue, we suggest to our all valuable customer to use other services like Verisys for the verifications of citizens (CNIC number, facial image and textural data).

3. ~~Verisys is already running in almost all the banking/telcos sector etc. however you may~~ contact us for the quick processing of your case and provision of Verisys facility. You may contact the undersigned or the following contact details for any further assistance.

Verifications Department
PSD Directorate- Nadra
Tel: 051-9108131-34
Email: qasim.rizvi@nadra.gov.pk
Fax: 051-9108137


Qasim Rizvi
Director Verifications

Attest


OFFICE OF THE
ASSISTANT POLITICAL AGENT
FR PESHAWAR

14

No. 6463 / APA (FR) / 1000
Dated Peshawar the 01/09/10

To,

The Deputy Commissioner
Peshawar

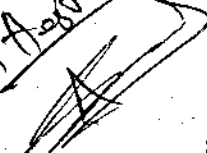
Subject: APPLICATION FOR THE GRANT OF ARM LICENSE.

R/Sir,

Enclosed find herewith an application in respect of Levy Sepoy Abdul Hamid S/O
Misal Khan r/o Bashi Khel, Asho Khel FR Peshawar for the grant of NPB arm license for favor
of further necessary action, please.

Encl: As above.


ASSISTANT POLITICAL AGENT
FR PESHAWAR

A. A. Asad


CONDITIONS ON DISCHARGE:

Stable on ATT.

(15)

Anwar B

NEXT APPOINTMENT:

[Handwritten signature]

Senior Registrar

[Handwritten signature]



DISCHARGE CARD

Hospital No.

[Empty boxes for Hospital No.]

Department of Medicine

MRN # 26654

Patient Name Abdul Hameed

F/W/S/D Name Mysal Khan

Age 34 Sex male Room _____ Bed 05

Address Peshawar

Diagnosis Right side Pleural effusion (pulmonary TB) plus Anemia

Date of Admission 06/05/2024

Date of Discharge 11/05/2024

Discharging Slip Prepared by _____

Kuwait Teaching Hospital

Abdara Chowk University Road, Peshawar. Ph: 091-5853486

[Handwritten signature]

E.C.G.:

X. RAY:

ULTRASOUND:

ECHO CARDIOGRAPHY:

CT SCAN / MRI:

BIOPSY:

ANY SPECIAL INVESTIGATIONS:

Supra AF-B → Not seen
Rural fluid HE done.

MO's / TMO's SUMMARY

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MO's / TMO's SUMMARY

E.C.G:

19

X. RAY:

ULTRASOUND:

ECHO CARDIOGRAPHY:

CT SCAN / MRI:

BIOPSY:

ANY SPECIAL INVESTIGATIONS:

Supra AF B → Not seen
Purged fluid PE done



Attended

TREATMENT AT HOME

گھر کیلئے علاج

Tab. Myrin-p forte

۳۴ بیس نیاں ۶ بجے

Tab. vite-6

۱۱۳۴ بیس ۶ بجے

Tab. Vitamine-6000

۱۱۳۴ بیس ۶ بجے

Tab. Folic Acid-5g

۱۱۳۴ بیس ۶ بجے

Tab. Neurobion

۱۱۳۴ بیس ۶ بجے

TREATMENT AT HOSPITAL ہسپتال کیلئے علاج

Tab. Myrin-p forte
QD

Tab. vita-6 50mg QD

inj Neurobion 1g

inj onset BD

inj Decadron 1cc TDS

Tab. paradol TDS P/B

Tab. Trinomic OD

Tab. folic acid 5mg
OD.

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17

TB TREATMENT - INITIAL PHASE			
Regimen Type	Drug Regimen	Dosage (mg)	Tablets
Regimen-1 (Adult)	2HRZE	(75/150/400/275)	4
Regimen-2 (Child)	2HRZ+E	(50/75/150)+100	+
Regimen-3* (Adult)-HrTB	2HRZE+Lfx	(75/150/400/275)+250	+

* only for TB cases who are laboratory confirmed Rifampicin sensitive, INH-Resistant and FQ-susceptible.

Date of Appointment of Drugs Collection

Current	Next	Current	Next
8-5-24	8-6-24		
8-6-24	8-7-24		
8-7-24	8-8-24		

Remarks

National Tuberculosis Control Program Pakistan
TB PATIENT CARD (TB 02)

TB TREATMENT - CONTINUATION PHASE			
Regimen	Drug Regimen	Dosage (mg)	Tablets
Regimen 1A (Adult)	4HR**	(75/150)	
Regimen 1B (Adult)	4HRZE*	(75/150/400/275)	
Regimen 2 (Child)	4HR**	(50/75)	
Regimen 3 (Adult)	4HRZE + Lfx	(75/150/400/275)+250	+

*Only for retreatment TB cases, if patient is AFB smear positive at the end of two months. Send sample for DST and adjust treatment when DST results are available as per national guideline. **Regimen 1A and Regimen 2 - extended for 6 more months (+6 HR) in case of TB Meningitis/Bone TB)

INVESTIGATIONS						
M	Date	Examination Type	Lab No	Result	CXR	Weight (KG)
0		AFB Smear			TB 948	57kg
		Xpert				
		HIV			8-5-24	85.24
		Other (Culture etc.)				
2		AFB Smear				
5		AFB Smear				
6		AFB Smear				

CXR-Chest X-ray, M-month of treatment
 Use blank row to enter results of other test done (as per required, eg culture)

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Affected

Treatment Outcome

Date of decision 8-5-24

- Cured
- Died (Reason: _____)
- Lost to follow up
- Transferred /Moved to DR-TB register
- Treatment completed
- Treatment failure
- Not Evaluated
- Re-enrolled on HrTB regimen (Regimen3)

① Myrin p-fort
 ② vita-6
 باقی دواؤں کے ساتھ ساتھ

مریض کیلئے ضروری ہدایات

- ۱۔ چاہے بہت اہم کارہائے اس کو اپنے پاس حفاظت سے رکھیں۔
- ۲۔ ڈاکٹر سے ملاقات، دوا کے حصول اور ڈاکٹر کا حکم کرانے کے لیے یہ کارہائے ہمراہ لائیں۔
- ۳۔ ٹی بی کا علاج مرض ہے۔ کامیاب علاج کے لیے اپنے ڈاکٹر کی ہدایات پر عمل کریں۔
- ۴۔ کامیاب علاج کے لیے باقاعدگی سے دوا کھانا ضروری ہے۔ مقررہ تاریخ پر مرکز صحت پر ضرور حاضر رہنا ہے۔
- ۵۔ اپنے گھر سے دور کسی مرکز صحت سے ٹی بی کی روایت حاصل کرنے کا ناکارہ طریقہ ہے۔
- ۶۔ معائنے سے پہلے وزن لگانی ضروری ہے اور وزن میں تبدیلی کے متعلق ڈاکٹر کو بروقت مطلع کریں۔
- ۷۔ اگر آپ اپنے علاج میں تعاون کریں گے تو آپ عمل طور پر صحت یاب ہو جائیں گے۔

بیم کا معائنہ کرانے کی تاریخ

تاریخ	بیم کا معائنہ کرانے کا مقام
تعمیر علاج	تاریخ روکنے کی تاریخ

National Tuberculosis Control Program Pakistan
TB PATIENT CARD (TB 02)

Registration No. K/119P/0140/58/2024
 CNIC No. _____ Family member (if < 18 yrs)

Name Roshid Hameed Father/Husband Name Misud Khan
 Address Sharikera Hassan and Dal Peshawar Date of registration 8-5-24

Sex: M F TG Age 34 Date of treatment start 9-5-24

Name of TB Care Facility (BMU) Kunkit Hospital

Name of Dr. Dr. Roshid

Disease site (tick one)
 Pulmonary Extra-Pulmonary (site) Pleura

Type of Patient (tick one)
 New Treatment after Lost to Follow up
 Relapse Treatment after failure
 Patient with unknown previous TB treatment history Other Previously treated patients



MOHSIN WELFARE FOUNDATION BLOOD TRANSFUSION SERVICES

& THALASSEMIA HOSPITAL PESHAWAR

(18)

BLOOD COMPONENTS ISSUANCE FORM 1402

PATIENT IDENTIFICATION DATA

PATIENT UNIQUE / HOSPITAL #: KTH Date: 8/5/24
 PATIENT NAME: Abdul Hameed AGE/DOB: 34 y
 PREFERRED BY: KTH Blood Bank SEX: M
 PATIENT BLOOD GROUP AND RH TYPE: A + ve positive

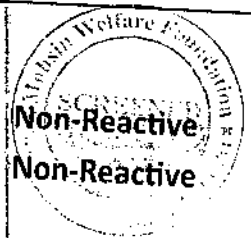
DONOR'S DETAILS

DONOR'S NO: 241209 + 241299

SCREENING TEST RESULTS:

1. Hbs Ag:	Non-Reactive	4. Anti HCV:	Non-Reactive
2. Anti HIV:	Non-Reactive	5. Syphilis:	Non-Reactive
3. Malaria:	Negative		

DONOR'S BLOOD GROUP & RH FACTOR:

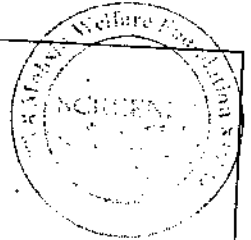


CROSS MATCH RESULTS:

CROSS MATCHED WITH

1. Saline Phase:	→	Compatible ✓
2. Albumin Phase:	→	Compatible ✓
3. Comb's/AHG Phase:	→	Compatible ✓

➤ Issue No of unit: 02 Component: RCU



Date/ Time of issue: 1:50 8/5/24
 Issuing Tehnologist: Joad
 Blood bag's Received By: Arshad Afridi

INSTRUCTIONS

Before starting the transfusion of this unit, verify patients's identity, blood group and Rh and donor unity number as per information given on transfusion form, blood unit, its tag, and labels.

After completion of transfusion please return the empty bag(s) along with the duplicate copy of this from to blood bank. In case of transfusion reaction stop administration of blood and initiate transfusion reaction investigation predure.

Counter sign by: Blood Bank technologist

Arshad Afridi



KUWAIT TEACHING HOSPITAL

ABDARA CHOWK UNIVERSITY ROAD, PESHAWAR PAKISTAN
TEL: 091-5711417-18, 091-5853486

DEPARTMENT OF PATHOLOGY



Name:	Abdul Hameed	SP No:	31594
Sex:	M	MR No:	2024-05-26654
Age:	34	Specimen:	Blood
Referred by:	Kuwait Teaching Hospital - KTH	Examination:	C/S
Received Date:	2024-05-07 16:13:37	Report Date:	2024-05-10 10:03:29

CULTURE SENSITIVITY REPORT

No growth of micro organism obtained after 72 hrs aerobic/anaerobic incubation at 37° C



Prof. Dr. Sajjad Ahmad
MBBS, M.Phil, Ph.D
Professor & Head
Pathology Department

Dr. Sardar Muhammad
MBBS, DOMS, M.Phil (Microbiology)
Professor &
Section Head Microbiology

Dr. Mohsina Haq
MBBS, M.Phil (Microbiology)
Associate Professor
Microbiology

Dr. Ashfaq Ahmad
MBBS, M.Phil (Microbiology)
Assistant Professor
Microbiology

Lab Technologist

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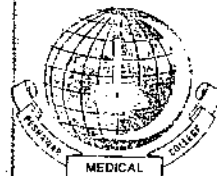


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DEPARTMENT OF PATHOLOGY



MRN 2024-05-27470 Lab No 626353 / 173
 Name FAKHRE ALAM Date 07 / 05 / 2024
 Gender M Age 25-Year, 0-Month, 0-Day
 Ref. By Specimen Blood

ga

Test	Result	Old Results	Units	Reference Range
------	--------	-------------	-------	-----------------

HAEMATOLOGY

Blood Group

Blood Group

'AB'

Rh Factor

Positive (+ive)

DONOR SCREENING

HBsAg (CMIA)	0.23 (Non Reactive)		By ICT	Cut off: 1.0
HCV By (CMIA)	0.06 (Non Reactive)		By ICT	Cut off: 1.0
HIV (CMIA)	0.13 (Non Reactive)		By ICT	Cut off: 1.0
VDRL, (RPR)	Negative (- ive)		By ICT	
MP ICT	Negative (- ive)		By ICT	
Haemoglobin	16.4		g/dl	M: 14 ---- 18, F: 12 ---- 15

NOTE:

In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report.

Attest
[Signature]



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DEPARTMENT OF PATHOLOGY



- 1) Vitamin B12/Folate level.
- 2) Hematinic therapy (Vib12/Folate/iron)
- 3) Serial CBC's.
- 4) Blood culture.

NOTE:

In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report.

21

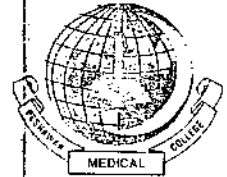
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AKH



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TEL: 091-5711417-18, 091-5853486

DEPARTMENT OF PATHOLOGY



29

MRN	2024-05-26654	Lab No	626192 / 18
Name	ABDUL HAMEED	Date	07 / 05 / 2024
Gender	M	Age	34-Year, 0-Month, 0-Day
Ref By		Specimen	Blood

Test	Result	Dates	Reference Range
06-05-2024 --			
LIVER PROFILE			
LFTs			
Bilirubin	0.5 mg/dl		(0.3 --- 1.2)
ALT(SGPT)	17 U/L		(09 --- 45)
Alkaline Phos	214 U/L		M: 80 --- 270 F: 65 --- 240 Child: up to 645
RENAL PROFILE			
RFTs			
Blood Urea	29 mg/dl		(15 --- 40)
S. Creatinine	0.8 mg/dL		(0.3 --- 1.3)
HAEMATOLOGY			
SP Smear			
WBC	15.45 (Corrected WBC 12.4) X10 ⁹ /L		(M 4.0 --- 10.0) (F 4.0 --- 10.0)
RBC	1.71 X10 ¹²		(M 4.5 --- 6.3) (F 3.80 --- 5.20)
Haemoglobin	5.4 g/dl		(M 13.5 -- 18.5) (F 11.5 -- 16.5)
HCT	17.3 %		(M 39 --- 52) (F 35 --- 46)
MCV	101.3 fl.		(M 77 --- 91) (F 71 --- 91)
MCH	31.6 pg		(M 26 --- 32) (F 26 --- 32)
MCHC	31.2 g/dl		(M 32 --- 36) (F 32 --- 36)
Platelets	64 X10 ⁹ /L		(150 --- 450)
DIFFERENTIAL			
Neutrophils	56 %		
Lymphocytes	25 %		
Monocytes	09 %		
Metamyelocytes	02 %		
Myelocytes	08 %		
MORPHOLOGY			
Anisocytosis	(+++)		
Poikilocytosis	(+)		
Microcytosis	(+)		
Macrocytosis	(++)		
Polychromasia	(++)		
Others	Ovalocytes.		
Reticulocytes	9.0 %		(0.2 --- 2.0%)
Malarial Parasites	No MP Seen.		
ESR	100 mm/1st hour		(00 --- 15)

- OPINION:**
- 1) Leucocytosis with left shift. Hypersegmented neutrophils seen.
 - 2) Severe anemia with macrocytic RBC's.
 - 3) Thrombocytopenia.

REMARKS:
Advised:

Attested
[Signature]

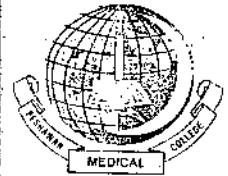


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TEL: 091-5711417-18, 091-5853486

DEPARTMENT OF PATHOLOGY



23

MRN 2024-05-26654

Lab No 626154 / 240

Name **ABDUL HAMEED**

Date 06 / 05 / 2024

Gender M

Age 34-Year, 0-Month,
0-Day

Ref. Dr. Faridullah Shah
By (Professor)

Specimen Blood

<u>Test</u>	<u>Result</u>	<u>Old Results</u>	<u>Units</u>	<u>Reference Range</u>
-------------	---------------	--------------------	--------------	------------------------

HAEMATOLOGY

Screening Blood Bag

Ticket No	3797469
Blood Bag No	8391
Cross Matching	Compatible
Blood Group	'A'
RH Factor	Positive (+ive)

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NOTE:

In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report.



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ABDARA CHOWK UNIVERSITY ROAD, PESHAWAR-PAKISTAN.
TEL: 091-5711417-18, 091-5853486

DEPARTMENT OF PATHOLOGY



MRN	2024-05-26654	Lab No	626354 / 181
Name	ABDUL HAMEED	Date	07 / 05 / 2024
Gender	M	Age	34-Year, 0-Month, 0-Day
Ref. By	Dr. Faridullah Shah (Professor)	Specimen	Blood

94

<u>Test</u>	<u>Result</u>	<u>Old Results</u>	<u>Units</u>	<u>Reference Range</u>
-------------	---------------	--------------------	--------------	------------------------

HAEMATATOLOGY

Screening Blood Bag

Ticket No	3799007	3797469 06-05-2024
Blood Bag No	8394	8391 06-05-2024
Cross Matching	Compatible	Compatible 06-05-2024
Blood Group	A	'A' 06-05-2024
RH Factor	Positive (+ive)	Positive (+ive) 06-05-2024

NOTE:
In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report.

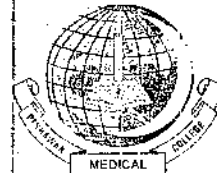


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TEL: 091-5711417-18 , 091-5853486

DEPARTMENT OF PATHOLOGY



MRN 2024-05-26654
Name **ABDUL HAMEED**
Gender M
Ref. By

Lab No 626499 / 68
Date 08 / 05 / 2024
Age 34-Year, 0-Month, 0-Day
Specimen Blood

JS

Test	Result	Dates	Reference Range
VIRAL PROFILE			
HBsAg (ICT)	Negative (-ive)	07-05-2024 06-05-2024	By ICT
SEROLOGY			
HIV	Negative (-ive)		By ICT
HCV By (CMIA)	0.07 (Non Reactive)	Cut off 1.0	By CMIA

Note: The test is performed on the state of the art "Abbott Architect Plus i1000SR.

NOTE:
In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report

Attended
[Signature]



KUWAIT TEACHING HOSPITAL

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TEL: 091-5711417-18, 091-5853486

DEPARTMENT OF PATHOLOGY



MRN 2024-05-26654
Name ABDUL HAMEED
Gender M
Ref. By

Lab No 626721 / 70
Date 09 / 05 / 2024
Age 34-Year, 0-Month, 0-Day
Specimen Blood

26

Test Result Dates Reference Range
07-05-2024 06-05-2024

HAEMATOLOGY

Blood Complete (CBC)

Haemoglobin	8.6	g/dl	M: 14 --- 18, F: 12 --- 15
TLC	6,000	/cumm	(4,000 --- 11,000)
DLC			
Neutrophils	65	%	(45 --- 75)
Lymphocytes	15	%	(20 --- 45)
Monocytes	18	%	(02 --- 10)
Eosinophils	02	%	(01 --- 06)
Platelets count	59,000	/cumm	(150,000 - 450,000)
HCT	28.3	%	(M: 39 - 52 F: 35 - 4)
MCV	96.9	fL	(76 --- 96)
MCH	29.5	pg	(27 --- 32)
MCHC	30.4	g/dl	(32 --- 36)

NOTE:
In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report

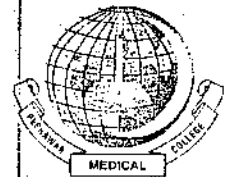
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TEL: 091-5711417-18, 091-5853486

DEPARTMENT OF PATHOLOGY



MRN	2024-05-26654	Lab No	6261147
Name	ABDUL HAMEED	Date	07/05/2024
Gender	M	Age	34-Year, 0-Month, 0-Day
Ref. By		Specimen	Sputum

27

<u>Test</u>	<u>Result</u>	<u>Old Results</u>	<u>Units</u>	<u>Reference Range</u>
OTHERS				
Sputum for AFB	No AFB Seen			

NOTE:
In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report.

Abdul Hameed
[Signature]

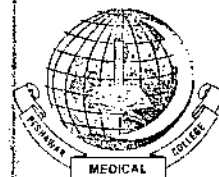


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TEL: 091-5711417-18, 091-5853486

DEPARTMENT OF PATHOLOGY



MRN 2024-05-26654 Lab No 626191 / 13
 Name ABDUL HAMEED Date 07 / 05 / 2024
 Gender M Age 54-Year, 0-Month, 0-Day
 Ref. By Specimen Fluid

28

Test	Result	Old Results	Units	Reference Range
------	--------	-------------	-------	-----------------

PLEURAL FLUID EXAMINATION

Physical Examination

Volume:	11.0		ml	
Appearance:	Turbid			
Clot:	Present			
Color:	Pale Yellow			
Blood:	Nil			
Protein:	3.3		g/dl	
Cell Count:	185		/cumm	

Microscopic Examination

Ciensa Stain: Shows Polymorphs 04%, Lymphocytes 96 %
 Gram's Stain: No microorganism seen.
 ZN Stain: no aff.

S : FP > 0.5
 LDH : FLOW > 0.6
 LDH > 2/3 of normal

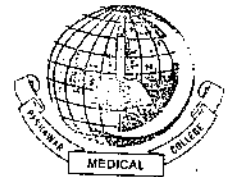
NOTE: In case of any technical discrepancies, the test will be repeated free of cost, within 24 hours of the report.

Attended



KUWAIT TEACHING HOSPITAL

ABDARA CHOWK UNIVERSITY ROAD, PESHAWAR-PAKISTAN.
TEL: 091-5711417-18, 091-5853486



DEPARTMENT OF PATHOLOGY

MRN 2024-05-26654 Lab No 626192 13
 Name ABDUL HAMEED Date 07/05/2024
 Gender M Age 34-Year, 0-Month, 0-Day
 Ref By Specimen Blood

29

Test	Result	Old Results	Units	Reference Range
HAEMATOLOGY				
SP Smear				
WBC	15.45 (Corrected WBC 12.4)		$\times 10^9/L$	(M 4.0 --- 10.0) (F 3.0 --- 10.0)
RBC	1.71		$\times 10^{12}$	(M 4.5 --- 6.2) (F 3.80 --- 5.20)
Haemoglobin	5.4		g/dl	(M 13.5 --- 18.5) (F 11.5 --- 16.5)
HCT	17.3		%	(M 39 --- 52) (F 35 --- 46)
MCV	101.3		fL	(M 77 --- 91) (F 71 --- 91)
MCH	31.6		pg	(M 26 --- 32) (F 26 --- 32)
MCHC	31.2		g/dl	(M 32 --- 36) (F 32 --- 36)
Platelets	64		$\times 10^9/L$	(150 --- 450)
DIFFERENTIAL				
Neutrophils	56		%	
Lymphocytes	25		%	
Monocytes	09		%	
Metamyelocytes	02		%	
Myelocytes	08		%	
MORPHOLOGY				
Anisocytosis	(+++)			
Poikilocytosis	(+)			
Microcytosis	(+)			
Macrocytosis	(++)			
Polychromasia	(++)			
Others	Dyserythrocytes			
Reticulocytes	9.0		%	(0.2 --- 1.0)
Malarial Parasites	No MP Seen			
ESR	100		mm-1st hour	(00 --- 15)

OPINION:

- 1) Leucocytosis with left shift. Hypersegmented neutrophils seen.
- 2) Severe anemia with macrocytic RBC's.
- 3) Thrombocytopenia.

REMARKS:

Advised:

- 1) Vitamin B12/Folate level.
- 2) Hematinic therapy (Vit B12/Folate/iron)
- 3) Serial CBC's.
- 4) Blood culture.

NOTE:

In case of any clinical discrepancy the test will be repeated free of cost, within 24 hours of the report.

Handwritten signature

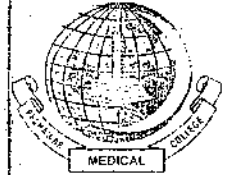


KUWAIT TEACHING HOSPITAL

ABDARA CHOWK UNIVERSITY ROAD, PESHAWAR-PAKISTAN.

TEL: 091-5711417-18 ; 091-5853486

DEPARTMENT OF PATHOLOGY



39

MRN	2024-05-26654	Lab No	626938 / 76
Name	ABDUL HAMEED	Date	10 / 05 / 2024
Gender	M	Age	34-Year, 0-Month, 0-Day
Ref. By		Specimen	Blood

Test	Result	Dates	Reference Range
		07-05-2024, 06-05-2024	
CARDIAC PROFILE			
LDH	997 U/L		(< 340)

NOTE:

In case of any clinical discrepancy, the test will be repeated (free of cost, within 24 hours of the report).

Abdul Hameed
[Signature]



KUWAIT TEACHING HOSPITAL

LAB & BLOOD BANK SERVICES

(INVESTIGATIONS OF A SUSPECTED TRANSFUSION REACTION) WORKSHEET - BLOOD BANK

ABDARA CHOWK, UNIVERSITY ROAD, PESHAWAR - PAKISTAN
TEL: 091-585386, 5711418 - EXT 106, Email: hr.kuwaithospital@gmail.com



ANNEX 'E'

31

1. MRN: _____ Patient Name _____
(W/O, S/O, D/O, M/O, F/O) Name _____ Sex: M / F
Age _____ Ward _____ Diagnosis _____
2. Donor Bag:- No. _____ Donated on _____
Issued on _____
3. Type of Blood Component: WB _____ RCC _____ Platelets Con _____ FFP _____ others _____
4. Transfusion given by Dr _____ Nurse _____
Administration: Started at _____ Stopped at _____ Date _____
5. Transfusion Reaction Occurred at _____ Hrs _____ Dated _____
6. Before Transfusion: Temp: _____ Pulse: _____ /min BP: _____ mm of Hg
7. After Transfusion: Temp: _____ Pulse: _____ /min BP: _____ mm of Hg
8. S/S: Discomfort, chills, Itching, Urticaria, Rash, Jaundice, LBA, Chest/Abdominal pain, Nausea / vomiting, Dyspnea, ARF, Shock, Coma
9. Blood Bank informed at _____ Hrs _____ Dated _____
10. Used donor bag received at Lab _____
11. Post - transfusion specimen received at Lab _____

TESTS	PRE-TRANSFUSION SAMPLE	POST TRANSFUSION SAMPLE
1. Visual check - Patient sample		
2. Visual check - Donor sample		
3. Plasma / serum color - patient		
4. Plasma / serum color - donor		
5. ABO & Rh group - patient		
6. ABO Rh group - donor		
7. DAT - Patient		
8. DAT Donor		
9. IAT - Patient		
10. IAT - Donor		
11. X-match Major		
12. Serum Bilirubin Direct / Indirect		
13. S. Urea / Electrolytes		

Donor Bag:-

1. Gram's Staining
2. Culture
3. Pyrogenicity test

Interpretation: HTR/NHTR, Others

Attended
[Signature]

Dated _____ Lab Tech _____ Pathologist _____



KUWAIT TEACHING HOSPITAL

LAB & BLOOD BANK SERVICES

(INVESTIGATIONS OF A SUSPECTED TRANSFUSION REACTION) WORKSHEET - BLOOD BANK

ABDARA CHOWK, UNIVERSITY ROAD, PESHAWAR - PAKISTAN
TEL: 091-585386, 5711418 - EXT 106, Email: hr.kuwaithospital@gmail.com



ANNEX 'E'

39

- MRN: _____ Patient Name _____
(W/O, S/O, D/O, M/O, F/O) Name _____ Sex: M / F
Age _____ Ward _____ Diagnosis _____
- Donor Bag:- No _____ Donated on _____
Issued on _____
- Type of Blood Component: WB _____ RCC _____ Platelets Con _____ FFP _____ others _____
- Transfusion given by Dr _____ Nurse _____
Administration: Started at _____ Stopped at _____ Date _____
- Transfusion Reaction Occurred at _____ Hrs _____ Dated _____
- Before Transfusion: Temp: _____ Pulse: _____ /min BP: _____ mm of Hg
- After Transfusion: Temp: _____ Pulse: _____ /min BP: _____ mm of Hg
- S/S: Discomfort, chills, Itching, Urticaria, Rash, Jaundice, LBA, Chest/Abdominal pain, Nausea / vomiting, Dyspnea, ARF, Shock, Coma
- Blood Bank informed at _____ Hrs _____ Dated _____
- Used donor bag received at Lab _____
- Post - transfusion specimen received at Lab _____

TESTS	PRE-TRANSFUSION SAMPLE	POST TRANSFUSION SAMPLE
1. Visual check - Patient sample		
2. Visual check - Donor sample		
3. Plasma / serum color - patient		
4. Plasma / serum color - donor		
5. ABO & Rh group - patient		
6. ABO Rh group - donor		
7. DAT - Patient		
8. DAT Donor		
9. IAT - Patient		
10. IAT - Donor		
11. X-match Major		
12. Serum Bilirubin Direct / Indirect		
13. S. Urea / Electrolytes		

Donor Bag:-

- Gram's Staining
- Culture
- Pyrogenicity test

Interpretation: HTR/NHTR, Others

Attended
[Signature]

Dated _____ Lab Tech _____ Pathologist _____



KUWAIT TEACHING HOSPITAL

ABDARA CHOWK UNIVERSITY ROAD, PESHAWAR-PAKISTAN.

TEL: 091-5711417-18, 091-5853486

DEPARTMENT OF PATHOLOGY



33

MRN	2024-05-26654	Lab No	626077 / 161
Name	ABDUL HAMEED	Date	06 / 05 / 2024
Gender	M	Age	34-Year, 0-Month, 0-Day
Ref. By		Specimen	Blood

Test	Result	Dates	Reference Range
------	--------	-------	-----------------

HAEMATOLOGY

Blood Complete (CBC)

→ Haemoglobin	3.0	g/dl	M: 14 --- 18, F: 12 --- 15
→ TLC	23,400	/cumm	(4,000 --- 11,000)
DLC			
→ Neutrophils	40	%	(45 --- 75)
→ Lymphocytes	51	%	(20 --- 45)
→ Monocytes	07	%	(02 --- 10)
→ Eosinophils	02	%	(01 --- 06)
→ Platelets count	72,000	/cumm	(150,000 - 450,000)
→ HCT	9.4	%	(M: 39 - 52 F: 35 - 4)
→ MCV	119.0	fL	(76 --- 96)
→ MCH	38.0	pg	(27 --- 32)
→ MCHC	31.9	g/dl	(32 --- 36)

NOTE:
In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report.

A. Hameed
[Signature]



KUWAIT TEACHING HOSPITAL

ABDARA CHOWK UNIVERSITY ROAD, PESHAWAR-PAKISTAN.
TEL: 091-5711417-18, 091-5853486

DEPARTMENT OF PATHOLOGY



34

MRN	2024-05-26654	Lab No	626077 / 161
Name	ABBUL HAMEED	Date	06 / 05 / 2024
Gender	M	Age	34-Year, 0-Month, 0-Day
Ref. By		Specimen	Blood

Test	Result	Dates	Reference Range
------	--------	-------	-----------------

HAEMATOLOGY

Blood Complete (CBC)

Hemoglobin	3.0 g/dl	M: 14 --- 18. F: 12 --- 15
TLC	23,400 /cumm	(4,000 --- 11,000)
BLC		
Neutrophils	40 %	(45 --- 75)
Lymphocytes	51 %	(20 --- 45)
Monocytes	07 %	(02 --- 10)
Eosinophils	02 %	(01 --- 06)
Platelets count	72,000 /cumm	(150,000 - 450,000)
HCT	9.4 %	(M: 39 - 52 F: 35 - 4)
MCV	119.0 fl	(76 --- 96)
MCH	38.0 pg	(27 --- 32)
MCHC	31.9 g/dl	(32 --- 36)

NOTE:

In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report.

Attested



KUWAIT TEACHING HOSPITAL

ABDARA CHOWK UNIVERSITY ROAD, PESHAWAR-PAKISTAN.
TEL: 091-5711417-18, 091-5853486

DEPARTMENT OF PATHOLOGY



MRN	2024-09-20054	Lab No	626149/340
Name	ABDUL HAMEED	Date	06 / 05 / 2024
Gender	M	Age	34-Year, 0-Month, 0-Day
Ref. By		Specimen	Blood

35

Test

Result

Old Results

Units

Reference Range

HAEMATOLOGY

Blood Group

Blood Group

'A'

Rh Factor

Positive (+ ive)

NOTE:
In case of any clinical discrepancy, the test will be repeated free of cost, within 24 hours of the report.

Handwritten signature and scribble

Pleural Tap

→ The procedure was explained to the patient & attended.

- Consent was taken.

→ Procedure was done under complete/Proper privacy.

^{Propos} → Aseptic measure was taken.

→ Pleural fluid was aspirated on first attempt.

→ Procedure was done in sitting position.

→ Fluid was greenish in colour. About 350ml of

fluid was aspirated. Fluid was watery in consistency.

Vitals before procedure

B.P. = 100/60

Pulse = 80

Temp = 98°F

SpO₂ = 98%

Vitals After procedure

B.P. = 105/70


Pulse = 72

Temp = A/F

SpO₂ = 97%

Dr.

name = Asim Zameer

Sign: 

Stamp:

Date: 10/05/24

Attended


36

OFFICE OF THE
SUPERINTENDENT OF POLICE,
SADDAR, CCP, PESHAWAR

NO. _____ /PA DATE: _____ /2022

Amir C

37

CHARGE SHEET

I, Aqeel Hussain, Superintendent of Police, Saddar Division, Peshawar, as competent authority, hereby charge you Abdul Hameed No.7760 PS Hassan Khel as follows:-

That you were selected for recruit trainings thrice to PTS Swat vide letter No. 5123-31-Trg dated 25.05.2021, to PTS Sawabi vide letter No.9235/Trg dated 26.11.2021 and to PTS Kohat vide letter No. 2365/Trg dated 04.03.2022 but you did not do your arrival report intentionally and absented yourself from your lawful duty since 25.05.2021. These acts on your part are gross misconduct, negligence and indiscipline categorized.

- i) This amounts to gross misconduct, negligence and malafide on your part for which you are liable for punishment as defined in Police Disciplinary Rules, 1975.
- ii) By the reasons of the above, you appeared to be guilty of misconduct under Police Disciplinary Rules, 1975 and have rendered yourself liable to all or any of the penalties specified in the said Rules.
- iii) You are therefore, required to submit your written defense within seven days of the receipt of this charge sheet to the Inquiry Officer/Committee.
- iv) Intimate whether you desire to be heard in person?
- v) A Statement of allegation is enclosed.

(Aqeel Hussain)
Superintendent of Police
Saddar Division CCP, Peshawar.

Attested
[Signature]

38

OFFICE OF THE
SUPERINTENDENT OF POLICE,
SADDAR, C.O. PESHAWAR
NO. 19/E -/A
DATE: 17-05-2022

DISCIPLINARY ACTION AGAINST FC ABDUL HANIF NO. 7769 PS HASSAN NIKEL.

1. Aqeed Hussain, Superintendent of Police, Saddar Division, Peshawar, as competent authority, one of the division that FC Abdul Hanif has rendered himself liable to be proceeded against as he has committed the following acts contrary within the meaning of Police Disciplinary Rules, 1975.

STATEMENT OF ALLEGATIONS.

That he was selected for recruit trainings under to PTS, Swat wide letter No. 5123-31 Tfg dated 25.03.2021 to PTS, Sawabi wide letter No. 9233/Tfg dated 26.11.2021 and to PTS, Kohat wide letter No. 2365/Tfg dated 04.03.2022 but he did not do his arrival report intentionally and absconded himself from his lawful duty since 25.05.2021. There gets on his part are gross misconduct, negligence and indiscipline categorized.

ii) That all the above acts amount to gross misconduct, negligence, inefficiency and malafide on his part for which he is liable for punishment as defined in Police (Disciplinary Rules, 1975).
iii) For the purpose of scrutinizing the conduct of said accused with reference to the above allegations, Muhammad Habib DSP is deputed as the inquiry Officer.
iv) The inquiry shall be conducted in accordance with the provision of the Rules to provide reasonable opportunity of hearing to the accused officer, record his finding within 15 days of the receipt of this order & make recommendations as to punishment or other appropriate action against the accused.

v) The accused shall join the proceeding on the date and time and place fixed by the inquiry Officer.

Seen
Call him to serve CS

(Aqeed Hussain)
Superintendent of Police
Saddar Division, C.O. Peshawar

Attended

8

OFFICE OF THE
SUPERINTENDENT OF POLICE,
SADDAR, CCP, PESHAWAR

Annexure 'D'

39

No. 19/E PA

Telephone No. 091-9330330

Dt: 06/07/2022

E.Mail-readersp76@gmail.com

FINAL SHOW CAUSE NOTICE.

I, Aqeeq Hussain, Superintendent of Police, Saddar, CCP Peshawar, as competent authority under the Police Disciplinary Rules, 1975 do hereby serve you finally FC Abdul Hameed No. 7760 of PS Hassan Khel, as follow:-

- a) That consequent upon the completion of enquiry against you by Enquiry Officer SDPO Badliher Peshawar for which you are given opportunity of hearing and producing evidence in your defense if any.
- b) On going through the finding of Enquiry Officers submitted vide memo: No. 1722/PA dated 04.07.2022. The material on record and other connected papers provide sufficient grounds of action against you.

I am satisfied that you have committed the following acts/omissions specified in the sub-para:-

That during departmental inquiry, you unable to appear before the inquiry officer and he recommended you for appropriate punishment.

1. As a result thereof, I, as competent authority, have tentatively decided to impose upon you major/minor punishment under the said rules.
2. You are therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate as to whether you desire to be heard in person.
3. If no reply to this notice is received within 15 days of its delivery, it shall be presumed that you have no defense to put-in and in that case ex-parte action shall be taken against you.
4. Copy of the findings of Enquiry Officer is enclosed.

Attested


(Aqeeq Hussain)
Superintendent of Police,
Saddar Division CCP, Peshawar.

OFFICE OF THE
SUPERINTENDENT OF POLICE,
SADDAR, CCP, PESHAWAR

NO. 2725 /PA.

DATE: 19/07 /2022

Annexure "E"

40

ORDER.

Under purview of Police Rules of 16.1(2), Police Act, 2017, Article 141(3), this order will dispose the departmental proceedings carried out against constable Abdul Hameed No. 7760 of PS Hassan Khel, ex-FR Peshawar.


- ❖ Reportedly he was selected for recruit training trice to PTS Swat vide letter No. 5123-31/Trg dated 25.05.2021, to PTS Swabi vide letter No. 9235/Trg dated 26.11.2021 and to PTS Kohat vide letter No. 2365/Trg dated 04.03.2022 but he did not do his arrival intentionally.
- ❖ Furthermore, he has absented himself from his official duty since 25.05.2021.
- ❖ He was charge sheeted vide this office No. 19/E/PA dated 17.05.2022 and departmental enquiry was entrusted to DSP Badhber. Enquiry officer submitted his report vide his office No. 1722/Badhber circle dated 04.07.2022, he recommended for appropriate punishment.
- ❖ Final Show Cause Notice vide this office No.19/E/PA dated 06.07.2022 was issued and served upon him, and hearing chance for defence provided to the accused Police official.
- ❖ He replied to final Show Cause Notice, which is placed in enquiry proceedings file and found unsatisfactory as he has admitted his indisciplined activities, willful absence from his official duties.
- ❖ Keeping in view his long period of absence since 25.05.2021 from his official duties, not obeying the legal orders of his senior officers and not joining basic recruit course after three times selection and he ceased to be efficient official, found guilty of misconduct, habitual absenter and recommendation of the enquiry officer, therefore, **Constable Abdul Hameed No. 7760 is hereby dismissed from Police Service w.e.f 25.05.2021 and period of absence is counted absence period without pay/salary.**

(Aqeen Hussain)
Superintendent of Police,
Saddar Division CCP, Peshawar.

OB No. 1820 dated 19/07/2022.

Copy to:

1. The Senior Superintendent of Police Operations, CCP Peshawar.
2. The Superintendent of Police Headquarters, CCP Peshawar.
3. Pay Officer/OASI/CRC/ EMC for necessary action.

Attested


Annexure "F"

(41)

BEFORE THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR



W.P No. _____/2022

Wazir Hussain S/o Ameer Zada R/o Gharhi Qamar Gul
Sherkera Tehsil & District Peshawar.

.....**Petitioner**

V E R S U S

1. Govt. of Pakistan through Secretary Interior, Pak Secretariat, Islamabad.
2. Government of KPK, through Secretary home, Civil Secretariat, Peshawar.
3. Inspector General of police / PPO KPK, Police Lines, Peshawar.
4. Deputy Superintendent of Police, CTD Peshawar
5. SHO Police Station CTD, Peshawar
6. SHO Police Station Mattani, Peshawar

.....**Respondents**

**WRIT PETITION UNDER ARTICLE
199 OF THE CONSTITUTION OF
ISLAMIC REPUBLIC OF
PAKISTAN, 1973 FOR DIRECTING
RESPONDENTS TO PRODUCE**

ATTESTED
EXAMINER
Peshawar High Court

(49)

THE DETENUE NAMELY ABDUL
HAMEED S/O MISAL KHAN R/O
GHARHI QAMAR GUL SHERKERA
TEHSIL & DISTRICT PESHAWAR,
BEFORE THIS HONOURABLE
COURT, SO THAT THIS
HONOURABLE COURT MAY
SATISFIED ITSELF THAT THE
DETENUE HAS NOT BEEN
DETAINED IN AN ILLEGAL
MANNER AND IF HIS DETENTION
IS FOUND ILLEGAL HE MAY BE
RELEASED FORTHWITH.

Respectfully Sheweth:

1. That the Petitioner is the real uncle of the detenue namely Abdul Hameed and is law-abiding citizen of Pakistan, belongs to Respectable family and having good reputation in the society. **(Copy of CNIC is Annexure "A")**.
2. That the nephew of the Petitioner/detenue was serving as Constable in Police Department, having good reputation in the society and having no criminal history.

ATTESTED
EXAMINER
PESHAWAR

- 43
3. That on 12.10.2022 some officials of Police Station Mattani and officials of CTD came to the House of the detenue, as the detenue was ill and was present at house, the above mentioned officials had illegally and unlawfully arrested the detenue.
 4. That the Petitioner is residing attached to the house of the detenue, came into the knowledge that the detenue namely Abdul Hameed was taken into custody by the some police officials and after that the detenue is missing and had not come back till date.
 5. That the Petitioner initially instigate himself about the detenue and thereafter approached to the Respondent No 6 to inquire about the detenue, but the officials of PS Mattani told the Petitioner that the detenue is with Superintendent of Police KPK Peshawar.
 6. That thereafter the Petitioner time and again approached to the Respondents and instigated about the detenue but in vain.
 7. That the petitioner is being aggrieved, having no other adequate and efficacious remedy, approached to this Honourable Court for release of his nephew / deetenue namely Abdul Hameed

ATTESTED
EXAMINER
Peshawar

~~44~~

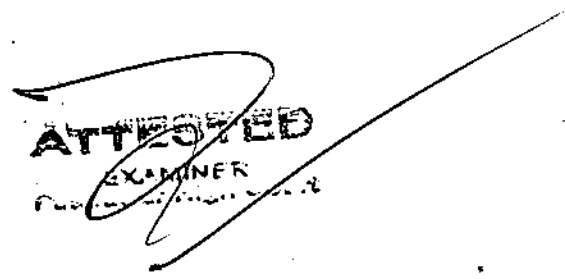
44

from the illegal detention of the Respondents, inter alia, on the following grounds:

GROUND S:

- A. That the detenue has not committed any offence and thus cannot be confined or detained without lawful excuse.
- B. That, the petitioner's family consists respected, law abiding persons and thus as a citizen of Pakistan enjoys an alienable right protected by the law of the land including lives, freedom of movement etc.
- C. That the detenue has not committed any offence warranting his arrest, therefore his arrest and detention under the illegal detention/ custody of respondents is without lawful authority.
- D. That the petitioner is being discriminated and he is being treated against the law and thus deprived of equal protection of law.
- E. That the respondents are misusing their powers by keeping the detenue in illegal detention.

ATTESTED
EXAMINER



- F. That the detenue's fundamental rights have been violated as he was detained without the sanction of any court and he has not been produce before any competent court of jurisdiction.
- G. That the detention of the detenue is violation of Article 10 of the Constitution of Islamic Republic of Pakistan, 1973.
- H. That under Article of the Constitution, every citizen of Pakistan is entitled to enjoy the protection of law and to be treated in accordance with, so, under the said Article the detenue is entitled the same treatment.
- I. That any other ground may be adduced during the course of arguments, with the kind permission of this Honourable Court.

It is, therefore, humbly prayed that the respondents be directed to produce the detenue namely Abdul Hameed, so that this Honourable Court satisfies itself about the legality and manner of his detention and incase he is not required in any offence his immediate release may please be ordered.

Any other relief justified in the given facts and circumstances of the case but not

ATTESTED
EXAMINER
[Signature]

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specifically prayed for may also please be allowed.


Petitioner

Through

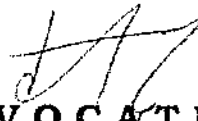
Dated: 22.10.2022



HIDAYAT ULLAH AFRIDI
Advocate, High Court
Peshawar

CERTIFICATE:

Certified on instructions of my client that petitioner has not previously moved this Hon'ble Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 regarding the instant matter.



ADVOCATE

LIST OF BOOKS:

1. Constitution of Islamic Republic of Pakistan, 1973
2. Any other law books according to need



ADVOCATE

ATTESTED

EXAMINER

47

BEFORE THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR

W.P No. _____/2022

Wazir Hussain.....Petitioner

VERSUS

Govt of Pakistan & others Respondents

AFFIDAVIT

I, Wazir Hussain S/o Ameer Zada R/o Gharhi Qamar Gul Sherkera Tehsil & District Peshawar, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Writ Petition** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Wazir Hussain

DEPONENT

CNIC # 17301-1547984-1 ✓

Cell # 0301-8830483

Identified by:

Hidayat Ullah Afridi

**HIDAYAT ULLAH AFRIDI
Advocate, Peshawar**

27/10/24	sworn on solemnly
affirmed that	22
contents of	Wazir Hussain
day of Oct	Peshawar
at Ameer Zada	Hidayat Ullah
who was for	
Who is present	

[Signature]
Peshawar
22/10/24

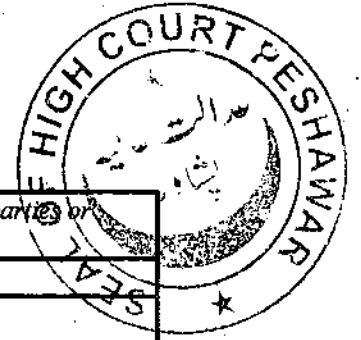
CERTIFIED TO BE TRUE COPY
EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 107 of
the Constitution of Pakistan, Act 1984
06 AUG 2024

Annexure "G"

48

PESHAWAR HIGH COURT PESHAWAR
FORM "A"

ORDER SHEET



Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
2	3
13.10.2023	<p><u>WP (HCP) No. 4115-P/2022.</u> Present:</p> <p>Petitioner in person.</p> <p>Mr. Junaid Zaman, Addl: Advocate General for officials of the Provincial Government.</p> <p>Mr. Sana Ullah, Deputy Attorney General for the Federation.</p> <p>Mr. Imtiaz Ali, Section Officer (Judicial) Home Department (Focal Person).</p> <p>*****</p> <p><u>MOHAMMAD IBRAHIM KHAN, CJ.-</u> Through this petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 the petitioner has prayed that the respondents be directed to produce the detinue namely, Abdul Hameed before this Court.</p> <p>2. As per report filed by the respondents and as stated before the Court, the detinue is not held by any of the agencies functioning under the control of Federal as well as Provincial Governments nor is confined in any of the internment centers.</p> <p>3. In view of above, this petition cannot proceed further,</p>

ATTESTED
EXAMINER
Peshawar High Court

hence stands dismissed. However, the petitioner is at liberty to record his grievance by lodging an FIR against the persons who took the detinue illegally by force, if even the substance in his petition require investigation and fixation of criminal liability against them.

Announced on;
13th of October, 2023

IK
CHIEF JUSTICE

CERTIFIED TO BE TRUE COPY
EXAMINER
Peshawar High Court, Peshawar
Authorized Under Article 8.7 of
the Qanoon-e-Sikahadal Act 1984
06 AUG 2024

5097

Date of Presentation of Application	19-06-08-224
No of Pages	48-56
Copying fee	06-08-224
Total	06-08-224
Date of Preparation of Copy	06-08-224
Date of Delivery of Copy	06-08-224
Announced By	U, G

17301-0344622-1
0301-8830483

7700

5/1/5

Handwritten text in Urdu script, appearing to be a list or a set of instructions, though the text is difficult to decipher due to the quality of the scan and the cursive nature of the handwriting.

Handwritten text at the bottom of the page, possibly a signature or a reference code.

49-A

Answer "H"

بخدمت جناب SSP آپریشن صاحب پشاور

جناب عالی:

گزارش کی جاتی ہے کہ سائل کنسٹیبل عبدالحمید 7760 بوجہ غیر حاضری محکمہ پولیس سے ڈمس ہوا تھا۔ چارج شیٹ اور ڈمس آرڈر ہمراہ درخواست لف ہیں۔ چونکہ سائل گھر کا واحد ذمہ دار فرد ہے جسکی وجہ سے سائل گھریلو مسائل اور بہاریوں جھگڑا ہوا تھا۔ جو کہ سائل کا اور کوئی ذمہ دار تبادلہ گھر میں نہیں تھا تا کہ مسائل حل کرنے میں معاون ہو۔ حالات واقعات ایسے بنے ہوئے تھے جس سے کافی کوششوں اور تگ و دو کے باوجود بھی چھٹکارا نہ مل رہا تھا۔ سائل کافی کشمکش اور ٹینشن میں مبتلا تھا اور بہ یک وقت گھر اور نوکری کو مناسب وقت دینا مشکل سے مشکل ہوتا جا رہا تھا۔ بدیں وجہ سائل کو اپیل کرنے میں دیر ہوئی۔ اور سائل اپنے فرائض منصبی سے ڈمس ہوا۔ چونکہ سائل گھر کا واحد ذمہ دار بندہ ہے اور نہایت غریب اور مفلس خاندان سے تعلق رکھتا ہے۔ اور پورے کنبے کی ذمہ داری سائل کے کندھوں پر ہے۔ سائل کا اور کوئی ذریعہ معاش نہیں ہے جس سے سائل کے خاندان کی کفالت ہو سکے۔

بذریعہ درخواست عاجزانہ استدعا ہے کہ سائل کو محکمہ پولیس میں سروس بحال کرنے کا حکم صادر فرما کر مشکور فرمائیں سائل اور اس کا خاندان تاحیات دعا گور ہے گا۔

دستخط: عبدالحمید

آپ کا تابع حکم کنسٹیبل عبدالحمید 7760۔



Annexure "H"

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**OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR**

Phone No. 091-9210989 Fax: No. 091-9212597

ORDER.

This order will dispose of the departmental appeal preferred by **Ex-Constable Abdul Hameed No. 7760**, who was awarded the major punishment of "**dismissal from service**" under KP PR-1975 (amended 2014) by SP/Saddar, Peshawar vide OB No. 1820, dated 19.07.2022.

2- Brief facts leading to the instant appeal are that the defaulter Constable was consecutively nominated thrice for Recruit Training Course to PTS Swat vide letter No. 5123-31/Trg, dated 25.05.2021, PTS Swabi vide letter No. 9235/Trg, dated 26.11.2021 and PTS Kohat vide letter No. 2365/Trg, dated 04.03.2022 but he neither joined the training nor reported to his official duty and remained absent from duty.

3- He was issued Charge Sheets and Summary of Allegations by SP/Saddar, Peshawar. SDPO/Badaber, Peshawar was appointed as Enquiry Officer to scrutinize the conduct of the accused official. The Enquiry Officer after conducting departmental enquiry submitted his findings in which he was recommended for appropriate punishment. The competent authority in light of the findings of Enquiry Officer issued him Final Show Cause Notice to which he replied but found unsatisfactory and hence, awarded the major punishment of dismissal from service.

4- He was called multiple times for personal hearing in Orderly Room through his contact numbers but he did not respond to attend the Orderly Room. Therefore, his appeal for setting aside the punishment awarded to him by SP/Saddar, Peshawar vide OB No. 1820, dated 19.07.2022 is hereby "**dismissed**".

"Order is announced"

**CAPITAL CITY POLICE OFFICER,
PESHAWAR**

No. 3405-12 /PA/CCP,

dated Peshawar the 13 05/2024

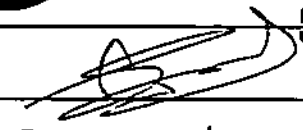
Copies for information and necessary action to the:-

1. SP/HQrs: Peshawar
2. AD/IT CCP Peshawar.
3. PO, CRC, OASI & FMC alongwith complete Fuji Misal.
4. Official concerned.

A. H. H. H.

پشاور بار ایسوسی ایشن، خیبر پختونخواہ




50380

ایڈوکیٹ: 

بار کونسل ایسوسی ایشن نمبر Bc-12-3479

رابطہ نمبر: 0346-9092470

PESHAWAR BAR ASSOCIATION

بعدالت جناب: خیبر پختونخواہ سروس ٹرانسپل لوجی سر

مخاطب: سائل / عدلی (عبدالحمید)

دعویٰ: Service Appeal

عدالت نمبر: _____

مورخہ: _____

جرم: _____

تھانہ: _____

بنام
Govt of KP through Chief Secretary
& Others.

بابت تحریر آئکہ

عبدالحمید
صاحب
قصر گل
پشاور

محمد امجد
ابراہیم

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
آن مقام سے کہلے عبدالحمید درانی ناصر خان ابا علی گل کو وکیل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کالہ اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقررات و فیصلہ بر حلف دینے جواب دہی کی دعویٰ اور درخواست کے ہر قسم کی تصدیق
زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا غلطی یا کلمہ نہ یا ایسا کرنے یا ایسا کرنے سے
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کے لئے کاربند ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جہتی
کاروائی کے واسطے اور وکیل یا مختار قانونی کیلئے ہر اختیار ہے بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس دہلی سانچے پر داخست منظور و قبول ہوگا
دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ قلمی مقام دورہ یا حد سے
باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ میں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المزوم: _____ /20

عبدالحمید

مقام _____ کے لیے منظور ہے۔