


FORM OF ORDER SHEET

Court of _____

Appeal No. 2026/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/10/2024	<p>The appeal of Mr. Noman Javed resubmitted today by Mr. Ahmad Sultan Tareen Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 29.10.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman  REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR.

NO. 2026 /2024

Noman Javed

vs IGP Pothohar

APPLICATION FOR FIXATION OF THE ABOVE TITLED ^{Appel} Service AT

PRINCIPAL SEAT, PESHAWAR

Respectfully Sheweth:

1. That the above mentioned S. A. is pending adjudication before this Hon'ble Tribunal in which no date has been fixed so far.
2. That according to Rule 5 of the Khyber Pakhtunkhwa Service Tribunal Rules 1974, a Tribunal may hold its sittings at any place in Khyber Pakhtunkhwa which would be convenient to the parties whose matters are to be heard.
3. That it is worth mentioning that the offices of all the respondents concerned are at Peshawar and Peshawar is also convenient to the appellant/applicant meaning thereby that Principal Seat would be convenient to the parties concerned.
4. That any other ground will be raised at the time of arguments with the permission of this Hon'ble tribunal.

It is therefore prayed that on acceptance of this application the may please be fixed at Principal Seat, Peshawar for the Convenience of parties and best interest of justice.

Noman Javed
Appellant/Applicant

Dated: 16/10/2024 Through

Ahmad Sultan Toran
Advocate High Court


Mudassar Ali Advocate

The appeal of Mr. Noman Javed received today i.e on 17.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures attached with the appeal are unattested.
- 2- Memorandum of appeal is not signed by the appellant.

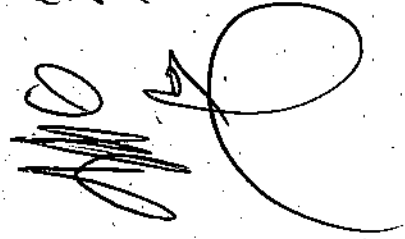
No. 920 /Inst./2024/KPST,

Dt. 17/10/2024.


ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Ahmad Sultan Tareen Adv.
High Court at Peshawar.

Resubmitted
objection removed please
file before Court.



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 2026 /2024

Noman Javed Vs. Inspector General of Police and others

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Through:

APPELLANT

Ahmad Sultan Tareen
Ahmad Sultan Tareen
Advocate High Court

Mudassir Ali
Mudassir Ali
Advocate High Court

Shahbaz Khan
Shahbaz Khan
Advocate High Court

Dated: ___/10/2024

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 2076/2024

NOMAN JAVED, FORMER SI NO. 142/H OF POLICE, PRESENTLY ASI OF POLICE, DISTRICT KOHISTAN UPPER AT DASSU, Resident of House No. 343/5 Upper Malikpura Abbottabad, Tehsil & District Abbottabad.

..... APPELLANT

Versus

1. INSPECTOR GENERAL OF POLICE, KHYBER PAKHTUNKHWA, CENTRAL POLICE OFFICE, Peshawar.
2. REGIONAL POLICE OFFICER, HAZARA RANGE, ABBOTTABAD.
3. DISTRICT POLICE OFFICER, KOHISTAN UPPER, DASSU KOHISTAN.

..... RESPONDENTS

=====

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST DISCIPLINARY ACTION COMMENCED BY THE RESPONDENT No. 3 AGAINST THE APPELLANT RESULTING INTO AWARD OF MAJOR PUNISHMENT BY HIS DISMISSAL FROM SERVICE UNDER ORDER OF SAID RESPONDENT ISSUED VIDE OB NO. 14 DATED 29-01-2024, WHICH WAS MAINTAINED ON REJECTION OF APPELLANT'S DEPARTMENTAL APPEAL; AND FINALLY THE SAID MAJOR PUNISHMENT HAS CONVERTED FROM DISMISSAL INTO MAJOR PUNISHMENT OF REDUCTION IN RANK VIDE ORDER No. S/2480-85/24 DATED 25.09.2024 ISSUED FROM THE OFFICE OF RESPONDENT NO. 1 IN CONNECTION WITH DISPOSAL OF REVISION PETITION OF THE APPELLANT UNDER KHYBER PAKHTUNKHWA POLICE RULES, 1975.

=====

PRAYER:

On acceptance of this appeal, the impugned disciplinary action and eventual award of major punishment as "Reduction in Rank" from the appellant's substantive rank of SI to ASI may kindly be set aside with direction to the respondents to restore

the substantive rank of appellant as SI with all back benefits having accrued or accruable in appellant's favor from the date of his dismissal from service subsequently converted into Reduction in Rank as afore-said!

Respectfully Sheweth,

The appellant seeks to prefer this appeal with the submissions as hereinafter follow:-

1. That the Appellant is the member of Khyber Pakhtunkhwa Police in junior rank. He while posted as SI in the district Kohsitan Upper, Dasso was served with the charge sheet alongwith statements of allegations to commence with disciplinary actions against him within the meaning of Khyber Pakhtunkhwa Police Rules, 1975. (Copy of charged sheet and statement of allegation are annexure "A" and "A-1" respectively)
2. That the Mr. Sajjad Muhammad DSP Dasso was appointed as inquiry officer. (IO) and having, been called by him in his office by the IO, the appellant submitted his written defence/statement before him. (Copy of the written defence is Annexure "B")
3. That except first opportunity afforded to the appellant by the said IO for submission of written defence, he was never got engaged with any further proceedings in inquiry by afore-named IO, who submitted his inquiry report (IR) bearing No. 125/R/DSP/Dasso dated 19.01.2024 to the respondent No.3 and the latter served the appellant with final show cause notice bearing No. 149/PA dated 22.01.2024 along with grounds of action. (Copy of inquiry report is annexure "C" of the show cause notice including grounds of action is annexure "D")
4. That there is a reference regarding another inquiry proceedings conducted by SP City Mansehra, as given in the

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IR (Annexure "C"), which obviously was conducted parallel to the inquiry pending with IO/DPS Dassu. In order to keep the things abreast, it may be submitted that during pendency of inquiry with IO/DPS Dassue, the appellant was required to appear before Mr. Bilal Ahmad PSP, worthy SP City Mansehra on 4.1.2024 at 11am through a letter addressed to respondent No.3. The appellant appeared before the afore-named SP City Mansehra on the given date who apprised the appellant of certain allegations and directed him to submit his written reply. The appellant on having noted down the allegations there in office of SP City Manshera submitted his written reply then and there as directed. (Copy of letter dated 4.1.2024 requiring appearance of the appellant before SP City Mansehra and of appellant's written reply are respectively annexure "E" and "F").

5. That the show cause notice (Annexure "D") served upon the appellant in pursuance to the inquiry report (Annexure "C") also discloses reliance upon inquiry report of SP City Mansehra. The appellant submitted his reply to the show cause notice pleading his innocence with sufficient reasons. However, the competent authority i.e. respondent No.3 did not give his judicious thought to the reply of appellant and proceeded to award the major punishment of appellant's dismissal from the service, under the Police Rules, 1975 vide order announced on 29.01.2024 bearing OB No.14 of even date. (Copy of reply to the show cause notice and of the order of respondent No. 3 are annexure "G" & "H" respectively).

6. That the appellant preferred departmental appeal as provided under Rule 11 of Police Rules, 1975 before the respondent No. 2 but the same could not get his favor and

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was rejected/filed vide order bearing his office No. 2591-92/PA dated 13-05-2024. (Copy of departmental appeal and of the rejection order of respondent No. 2 are Annexure "I" & "J" respectively)

7. That Sub Rule (4) of Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 provides that the revision petition shall lie within 30 days of the order passed on original appeal for which forum in case of the appellant was Inspector General of Police Khyber Pakhtunkhwa. The appellant filed revision petition before the respondent No. 1 within 30 days from the appellate order of Respondent No. 2. By an order bearing Endst: No. 2480-85/24 dated 25-09-2024 passed in connection with the appellant's revision petition, though the appellant was not exonerated from the disciplinary action and charges but major punishment of appellant's dismissal from service was converted to another major punishment of reduction in rank of the appellant from his substantial rank of SI to ASI and he has been reinstated into service. Thus, grievance of the appellant is still intact against the disciplinary action initiated against him with the charge sheet issued by the respondent No. 3 followed by inquiry and award of major punishment, against the appellate order of respondent No.2 now merged in the order of revisional forum, and lastly from the order of respondent No. 1. (Copy of Revision Petition and of the order of respondent No. 1 are Annexure "K" & "L" respectively).
8. That anticipating their reference during the course of arguments, certain documents though of secondary worth, are submitted for advantage. Copies of such secondary documents are Annexure "M" all together)
9. That the appellant seeks to invoke the jurisdiction of this Hon'ble Tribunal under Section 4 of the Khyber

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Pakhtunkhwa Service Tribunal Act, 1974 on the grounds,
inter alia, as follow:-

GROUNDS

- A. That the allegations enumerated in the Statement of Allegations served with the Charge Sheet upon the appellant and those deduced from the report of SP City Mansehra to enhance the gravity of charge, are nothing but the figment of a mind set to victimize the appellant by hook or by crook. So, the impugned disciplinary proceedings as conducted against the appellant and imposition of major penalty against him in result thereof are arbitrary, perverse, random, erroneous, baseless, unlawful, mala fide, against the facts and against the law necessitating to be annulled being void *ab initio*.
- B. That the main IR and the flying report of worthy SP City Mansehra cached by IO/DSP made to work against the appellant are *ex facie* defective and made out in hit and run manner in disregard to the well settled principles of fair trial and due process. Thus, the said reports were wrongly made basis for the impugned action against the appellant in violation of his legal and constitutional rights.
- C. That the impugned IR is self-evident that the Appellant was not got properly associated with the inquiry proceedings in light of his defenses advanced in his written reply of the charge sheet to the IOs, and as such, the appellant has been condemned unheard in violation of the principles of natural justice and equity.
- D. That mode and manner adopted to expose the appellant to disciplinary action and then gathering of information from the here and there to stack an aspersive material against the appellant to punish him by any of the possible means, irrespective of their fairness or legality, speaks volumes of the arbitrariness of Respondents and their predisposition for punishing the Appellant for no valid reason.
- E. That the impugned Order (Annexure-H) was though was marinated with a spicy paragraph from the so called report of SP City Mansehra

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which ended with a soft recommendation against the appellant that he is not simply fit for field work, and may be pricked by his conscience; he could not recommend the award of major punishment. On the other hand, IO/DSP recommended suitable major or minor punishment in spite of the botched up inquiry proceedings, which shows malafide on his part.

F. That the allegations as designed in the Statement of Allegations or those deduced from the report of SP City Mansehra stood in need of evidence to be collected by the IO with affording of reasonable opportunity of cross-examination of the witnesses to the appellant. The IR as submitted by the IO is not based on any evidence having backing of the procedural requirement for its admissibility against the appellant under the facts and law.

G. That the appellant preferred departmental appeal against the impugned order of punishment with solid grounds and expositions; which if considered judiciously, would have warranted its acceptance and setting aside of penalty imposed upon the appellant with his exoneration from the charges. However, the same was rejected/filed cursorily in hit and run manner. Therefore, the appellant challenged the original as well as appellate order through revision petition made to lie within 30 days before the Inspector General of Police (Respondent No. 1) within meaning of Sub Rule (4) of Rule 11-A of the Khyber Pakhtunkhwa Police Rules, 1975, which resulted into conversion of major punishment of dismissal from service into reduction in rank as already expounded herein above. Thus, having exhausted the departmental remedies provided under the said rules as a special law, the appellant is now left with no other remedy but to invoke the jurisdiction of this Hon'ble Tribunal for justiciability of the impugned orders and of the disciplinary proceedings in background.

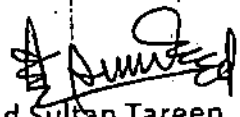
(7)


- H. That with the foregoing grounds among others not specifically urged here for the sake of brevity, the appellant is innocent and disciplinary proceedings in toto including the imposition of major penalty against him whether original or substituted are illegal, baseless, legally and factually erroneous, malicious, unjust, unfair, otherwise than due process of law, against the facts and law, and not tenable having regard to the principles of natural justice. So, the appellant is entitled for the relief prayed for under the facts and law.
- I. That the grounds urged herein are concise and if the need so arises, other grounds will be advanced during arguments at the bar with permission of this Hon'ble Tribunal.
- J. That this appeal is within time and this Hon'ble Tribunal has got jurisdiction to adjudicate upon the same. As a matter of precaution, the appellant submits that he may be allowed to seek the condonation of delay, if a question as to bar of limitation arises on some workable grounds during hearing of the appeal.


It is respectfully prayed that this service appeal may graciously be accepted as per prayer in the heading herein-above.

APPELLANT

Through:


Ahmad Sultan Tareen
Advocate High Court


Mudassar Ali
Advocate High Court


Shahbaz Khan,
Advocate High Court

Dated: ___/10/2024

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Noman Javed

.....APPELLANT

VERSUS

Inspector General of Police and othersRESPONDENTS

AFFIDAVIT

I, Noman Javed, the appellant do hereby state on solemn affirmation that contents of the accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed.


DEPONENT

I, MUHAMMAD KHALID, District Police Officer, Upper Kotistan, as a competent authority, is hereby charge you SI Muhammad Iqbal No. 142/13, while posted at Luchargi PP Station, Natta as explained in the attached sub item of allegations.

You appear to be guilty of misconduct under Police disciplinary rules - 1973, and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary rules.

You are therefore, required to submit your written defence within seven (07) days on the receipt of this Charge Sheet to the Enquiry Officer.

You written defence, if any should reach the enquiry officer with in the specified period, failing which it will, presumed that you have no defence to put in and in that case, expedite action shall follow against you.

Indicate whether you desire to hear in person.

A statement of allegation is enclosed.

District Police Officer,
Upper Kotistan

CHARGE SHEET

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Amir
A

Handwritten notes and signatures at the top of the page, including a date "13-11-73" and a signature.

(10) Annex - er AX/1

DISCIPLINARY ACTION

MUMAMMAD KHALID, District Police Officer, Upper Kohistan, as competent authority of the opinion that you SI Noman Javed No. 142/11, while posted at Incharge PP Suiyar Nalla have rendered yourself liable to be proceeded against as you committed the following transgression within the meaning of Police Disciplinary Rules - 1975.

STATEMENT OF ALLEGATIONS

1. That you were posted as Incharge PP Suiyar Nalla and directed to ensure your arrival at duty place, and your application for 15 days will be allowed after your arrival in the new posting place, but you made your arrival by telephonically message and did not obey the order of the undersigned.
2. That you remained absent from your lawful duty with any prior intimation/permission of your seniors from the dated 30-11-2023 to till date.
3. That you are habitual absentee and do not take interest in your official duties.
4. That your irresponsible attitude and disinterest toward your duty made you liable for departmental action against you being a member of discipline force.

~~For the purpose of scrutiny of the conduct of the said accused, officials will refer to the above allegation and conduct of the said accused. Enquiry Officer, Mr. Sillan Muhammad DSP Dera.~~

provide reasonable opportunity of hearing the delinquent to furnish final reply within seven (07) days of the receipt of this order, recommendation is to punishment or other appropriate action as may be decided.

The accused officer and a well conversant representative of the department shall remain present in the proceedings on the date, time and place fixed by the Enquiry Officer.

District Police Officer,
Upper Kohistan

No. 727/A dated Kohistan the 30/11/2023.

Copy of above is forwarded to:-

1. Mr. Sillan Muhammad DSP Dera Enquiry Officers for initiating proceedings against the delinquent under provisions of the Police Disciplinary Rules - 1975.
2. Delinquent official through Enquiry Officer.

District Police Officer,

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OFFICE OF THE
DEPUTY SUPERINTENDENT OF POLICE,
CIRCLE DASSU UPPER KOHISTAN

No. 125 /R/DSP Dassu dated 19/01/2024

To: The District Police Officer,
Upper Kohistan

Subject: ENQUIRY REPORT AGAINST SI NOMAN JAVED.

Memo:

In compliance of the instructions regarding Charge Sheet along with disciplinary actions issued by Worthy DPO Upper Kohistan vide his office Endst No. 2572-73/PA dated 28-12-2023 and other relevant documents of delinquent SI Noman Javed have marked to the undersigned for proper/Formal departmental enquiry. On the receipt of enquiry documents, the undersigned has been started enquiry process as per law and rules. Process of enquiry is as under, please.

STATEMENT OF ALLEGATIONS.

As per Charge, the following allegations have been charge upon the delinquent official.

1. That you were posted as Incharge PP Sumar Nalla and directed to ensure your arrival at duty place, and your application for 15 days will be allowed after your arrival in the new posting place, but you made your arrival by telephonically message and did not obey the order of the undersigned.
2. That you remained absent from your lawful duty with any prior information/permission of your seniors from the dated 30-11-2023 to till date.
3. That you are habitual absentee and do not take interest in your official duties.
4. That, your irresponsible attitude and disinterest toward your duty made you liable for departmental action against you being a member of discipline force.

S. Javed
19/01/2024

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A. INQUIRY PROCEEDINGS.

Charge Sheet along with disciplinary action have serve upon him and the undersigned called him in his office, after hear in person and got his written statement. As per record he reported his arrival in district Upper Kohistan on 06.11.2023. As per statement, he stated that he was spent casual leave of 14 days from lines Komula and then also 15 days earn leave from 03.12. 2023, to 18.12.2023, due to illness of his father and wife. On 01.12.2023 the said SI was posted as Incharge PP Sumar Nala, but he failed to obey the order of DPO Upper Kohistan well in time. He remained absent from 18.12.2023 to 28.12.2024 and then report at PP Sumar Nala. Due to his absence and did not take interest in his official duties. DPO Upper Kohistan has been suspended him and close to Police lines Komula vide order No.3025-02/PA dated 29-12-2023.

B. During the process of enquiry, letter regarding obtaining CDR of his cell No. 03116669666 has been submitted to Technical branch RPO office vide this office letter No. 47/R, dated 3.1.2024, but reply is still awaited.

C. After on another complaint against the said SI has also been received through Regional Police officer, Hazara Region Abbottabad along with enquiry report of SP/HC^{City} district Mansehra for proposing/ suggestions of punishment vide his office letter No. nil dated 17-01-2024.

The attitude of official is also checked well in manner for finalizations of enquiry proceed by the undersigned.

CONCLUSION

Keeping in view all aforementioned facts, and in the light of SP City district Mansehra enquiry report, the undersigned would like to opine that SI Noman Javed has serious characters and disciplinary issues as well as irresponsible attitude, disinterested in his official duties and bringing bad repute to police department and general public. Hence it is therefore, recommended him for suitable (Major or Minor) punishment, please.

Issue final show cause
Noman
DPO / U Kohistan
02.1.2024

S. Sajjad
(SAJJAD MUHAMMAD)
Deputy Superintendent of Police
Circle Dasso, Upper Kohistan

19-01-2024

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Annex - "D"

OFFICE OF THE DISTRICT POLICE OFFICER, UPPER KOHISTAN

No. 149 /PA.

Dated 22/01/2024.

FINAL SHOW CAUSE NOTICE

I, Muhammad Khalid PSP, District Police Officer, Upper Kohistan as competent authority under Police Rules - 1975 do hereby serve you SI Muhammad Javed No. 142/11 while posted as Subordinate Police Officer, Kumbhar has committed following misconducts:-

1. That you were posted as incharge Police Post Samar Nalla and directed to ensure your arrival at duty place and your application for 15 days will be allowed after your arrival in the new posting place, but you made your arrival by telephonically message and did not obey the order of the undersigned well in time.
2. That you remained absent from your lawful duty with any prior information/permission of your seniors from the dated 20-11-2023 to 28.12.2023.
3. That you are habitual absentee and do not take interest in your official duties.
4. Charge Sheet along Disciplinary action was issued to you vide this office Memo No. 2572-73/PA dated 28.12.2023 and Mr. Sajjad Muhammad DSP/Dassu appointed as Enquiry Officer.
5. As per finding report of Enquiry Officer and enquiry report of SP City District Muzaffra received from the office of the WAPCO Hazara Region Abbottabad, you were found guilty of charges and were recommended for punishment.
6. That, your irresponsible attitude and disinterest toward your duty made you liable for departmental action against you being a member of discipline force.

- i. That by reason of above, as sufficient material is placed before the undersigned; it is decided to proceed against you in general Police proceedings without aid of enquiry officer.
- ii. That the misconduct on your part is prejudicial to good order of discipline in the Police Force.
- iii. That your retention in the police force will amount to encourage inefficient and unbecoming of good police officers.
- iv. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action against you by awarding one or more of the kind punishments as provided in the rules.
- v. You are, therefore called upon to show cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred to above.
- vi. You should submit reply to this Final Show Cause Notice within Seven (07) days of the receipt of the notice failing which ex-parte action shall be taken against you.
- vii. You are further directed to inform the undersigned that you wish to be heard in person or not.

(Muhammad Khalid) PSP
District Police Officer,
Upper Kohistan

Received by _____
Dated _____/_____/2024

(15)

OFFICE OF THE DISTRICT POLICE OFFICER, UPPER KOHISTAN

GROUND OF ACTION

That the SI Noman Javed No. 142/11, while posted as Suspended Police Line Kunjla has committed following misconducts:-

1. That he was posted as Incharge Police Post Sumar Nalla and directed to ensure his arrival at duty place and his application for 15 days will be allowed after his arrival in the new posting place, but he made his arrival by telephonically message and did not obey the order of the undersigned well in time.
2. That he remained absent from his lawful duty with out prior information/permission of his seniors from the dated 30-11-2023 to 28.12.2023.
3. That he is habitual absentee and do not take interest in his official duties.
4. Charge Sheet along Disciplinary action was issued to him vide this office Encls: No. 2572-73/PA dated 28.12.2023 and Mr. Sajjad Muhammad DSP/Dusau appointed as Enquiry Officer.
5. As per finding of enquiry Officer, and enquiry report of SP City district Manasheer received from the office of the W/RPO Hazara Region Abbottabad, he was found guilty of charges and recommended for punishment.
6. That, his irresponsible attitude and disinterest toward his duty made him liable for departmental action against him being a member of discipline force.

By reasons of above, he has rendered himself liable to be proceeded under Khyber Pakhtunkhwa Police Rules - 1975 hence these ground of action.

(Signature)
(Muhammad Khalid) PSP
District Police Officer,
Upper Kohistan

No. 150-SI/2024.

Copy of the above is forwarded for favour of information to the:

1. The W/Regional Police Officer Hazara Region Abbottabad.
2. The delinquent Official for compliance and report.

(Signature)
District Police Officer,
Upper Kohistan

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Annex - "E"



OFFICE OF THE SP CITY MANSEHRA
(Khyber Pakhtunkhwa Police)

No. 01 /PA, dated 03 /01/2024

Tel: No. 0997-920203 and Fax No. 0997-920104

E-Mail: dpomanshra1@gmail.com

From: The District Police Officer,
Mansehra

To: The District Police Officer,
Upper Kohistan

Subject: ENQUIRY

Memorandum

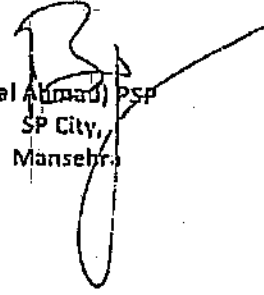
It is intimated that on the direction of Regional Police Officer, Hazara Region Abbottabad the undersigned is conducting enquiry against SI Noman Javed of Upper Kohistan District.

It is, therefore, requested that the aforementioned officer may be informed to appear before the undersigned on 04-01-24 at 11:00 AM.


(Bilal Ahmad) PSP
SP City,
Mansehra


No. 02 /PA

Copy submitted to the Regional Police Officer, Hazara Region Abbottabad with reference to Region office Memo: No. 905/C Cell dated 29-12-2023.


(Bilal Ahmad) PSP
SP City,
Mansehra

38
3-1-24

Dsp Ali

419


DPO Wk
3/1/24

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Handwritten text in Arabic script, possibly a title or section header, including "فهرست" (Index) and "موضوعات" (Topics).

Main body of handwritten text in Arabic script, organized into columns, possibly representing a table of contents or a list of items.

Handwritten text in Arabic script, including dates like "21/12/2022" and "FIA", and other notes.

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سن ۲۰۱۳ء میں اس وقت کہ میں نے اپنی کتاب '۱۰۰۰ مسالے' لکھی تھی
 اس وقت سے ہی اس کی کئی کئی سوانحیں لکھی ہیں اور اب یہ کتاب
 لکھی جا رہی ہے۔ اس کے علاوہ کئی دیگر کتابیں بھی لکھی ہیں
 جن میں سے کئی کتابیں '۱۰۰۰ مسالے' کے تحت لکھی گئی ہیں۔

۱۰۰۰ مسالے - ۱

اس کتاب میں ۱۰۰۰ مسالے ہیں جن میں سے کئی مسالے
 مختلف شعبوں کے ہیں۔ اس کے علاوہ کئی دیگر
 کتابیں بھی لکھی ہیں جن میں سے کئی کتابیں
 '۱۰۰۰ مسالے' کے تحت لکھی گئی ہیں۔

اس کتاب میں ۱۰۰۰ مسالے ہیں جن میں سے کئی مسالے
 مختلف شعبوں کے ہیں۔ اس کے علاوہ کئی دیگر
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 کتابیں بھی لکھی ہیں جن میں سے کئی کتابیں
 '۱۰۰۰ مسالے' کے تحت لکھی گئی ہیں۔

۱۰۰۰ مسالے - ۲

اس کتاب میں ۱۰۰۰ مسالے ہیں جن میں سے کئی مسالے
 مختلف شعبوں کے ہیں۔ اس کے علاوہ کئی دیگر
 کتابیں بھی لکھی ہیں جن میں سے کئی کتابیں
 '۱۰۰۰ مسالے' کے تحت لکھی گئی ہیں۔

۱۰۰۰ مسالے - ۳

اس کتاب میں ۱۰۰۰ مسالے ہیں جن میں سے کئی مسالے
 مختلف شعبوں کے ہیں۔ اس کے علاوہ کئی دیگر
 کتابیں بھی لکھی ہیں جن میں سے کئی کتابیں
 '۱۰۰۰ مسالے' کے تحت لکھی گئی ہیں۔

درآمد و مخارج و ...
بسم الله الرحمن الرحيم
الحمد لله رب العالمين

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مجلس خوارزمی - ۱۴۲۲ هـ - ۱۴۲۲ هـ
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مجلس خوارزمی - ۱۴۲۲ هـ - ۱۴۲۲ هـ
مجلس خوارزمی - ۱۴۲۲ هـ - ۱۴۲۲ هـ

مجلس خوارزمی - ۱۴۲۲ هـ - ۱۴۲۲ هـ
مجلس خوارزمی - ۱۴۲۲ هـ - ۱۴۲۲ هـ

مجلس خوارزمی - ۱۴۲۲ هـ - ۱۴۲۲ هـ
مجلس خوارزمی - ۱۴۲۲ هـ - ۱۴۲۲ هـ

مجلس خوارزمی - ۱۴۲۲ هـ - ۱۴۲۲ هـ
مجلس خوارزمی - ۱۴۲۲ هـ - ۱۴۲۲ هـ



21

Annex - "E/1"

POLICE DEPARTMENT

DISTRICT MANSEHRA

From The Superintendent of Police,
City, Mansehra

To The Regional Police Officer,
Hazara Region, Abbottabad.

No. 14 /PA/ SP City, Mansehra Dated the 12/01/2023

Subject: **ENQUIRY REPORT AGAINST SI NOMAN JAVED.**
Memorandum.

Kindly refer to the Region Office complaint cell Memo No. 8857C/Cell dated 29.12.2023.

It is submitted that the delinquent police official was heard in person pertaining to all allegations and his statement was recorded. Undersigned employed various sources, reports and data to verify whether allegations leveled against him are true or not. The actual facts against each allegation are as follows:

- 1- Si Noman Javed while posted as incharge ACLC Abbottabad did acts of vandalism and hoodlunism in a bid to stop an official enquiry of FIA against his first cousin Shahzeb Rana whose marriage proposal was refused by girl named Noor ul Huda. It has been verified from a senior officer of FIA who directly took up the matter with the police department back in December 2022. The allegations ranging from threatening the concerned FIA Enquiry officer of dire consequences to influencing the enquiry proceedings to creating terror and chaos in premises of FIA office and above all harassing the aforementioned girl to take her complaint back are all established facts and true beyond any iota of doubt. In this regard, Noman Javed was also proved guilty by the then ASP Cantt and then was awarded punishment by the district police officer.
- 2- With regard to Si Noman Javed's laziness and casual approach towards assigned duties, it has been verified that he was found absent on couple of occasions involving VVIPs security duties. One such instance was IGP's visit to Abbottabad on 5th May, 2023, where Noman Javed was tasked with security of outer cordon of police club. But he willfully absented himself as reported by the then SP headquarters and registered in daily diary madd No. 30. However, in his defence, Noman Javed presented copy of daily diary report madd No. 33 showing that immediately he fell back to duty place within 10 minutes. Most probably, he went away for around an hour or so and there might be some misappropriation by lower staff in the daily diary to accommodate him and to cover his absence. Similarly, during a squad duty of receiving a Chinese delegation from the boundary of Abbottabad and to escort them further outside the district, Noman Javed was found late, casual and lacking in duty.
- 3- Pertaining to his attitude and behavioral issues, Noman Javed was found misbehaving with the public while posted as SHO PS Cantt and Mangal. Noman Javed was reported as a habitual drinker and womanizer. Although, drinking alcohol and indulgence in partying and sexual activities is highly personal but these activities had a profound impact on his official duties. Many a times, public knew that he was not in his senses after drinking. Few incidents were also reported where Noman Javed was found enjoying parties in uniform. This was absolutely detrimental for the district police's image in eyes of the public.
- 4- Various reports from agencies have been gathered and it came to light that Noman Javed had pertinent connivance with drug peddlers, liquor sellers and timber mafia. In this respect, allowing access to vehicles laden with wood and giving space to dealers to freely sell liquor and drugs in his AOR was a routine matter during his posting as

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District Police Officer,
Upper Kohistan

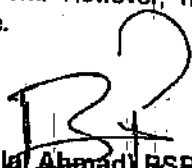
SHO. Eventually, he had to take cases of narcotics to keep up his monthly progress.

5- It has been confirmed from record that his performance in controlling the crime rate in jurisdiction of his PS was below par due to his lackluster response towards official duties and assigned tasks. As reported by his immediate supervisory officers, there was not much progress in tracing cases, action against drug peddlers, preventive action, complaint disposal and effective patrolling. Coupled with this, he was also found lacking in progress as Incharge ACLC. However, there had been an instance of huge recovery of 16 vehicles and motorcycles but that was due to team work not as a result of his own efforts and personal interest.

6- Finally, it has been confirmed from DPO Upper Kohistan that he took leave for 14 days and then for another 15 days. Apart from this, he was found absent in Upper Kohistan for rest of almost 40 days and also he didn't join the PP Summer Nalla he was posted to. His locations were checked from his CDR and he was located all the time in Abbottabad. A separate charge sheet has been issued to SI Noman Javed by DPO Upper Kohistan and inquiry is under process. (Copy of charge sheet is appended).

7- Various show cause notices and charge sheets have been served to SI Noman Javed in lieu of multiple complaints against him by the public as well as by the legal fraternity. These include charging people in fake cases, complicity with drug peddlers and criminal elements, misguiding senior officers, non-compliance of orders in POs/CAs campaigns, consuming case properties and articles confiscated from accused and lackluster approach while discharging official duties. All this speaks volumes of the fact that SI Noman Javed has been inefficient, incompetent and indisciplined officer. The exact details of FIRs and complaints are attached for reference.

Keeping in view all the aforementioned facts, the undersigned would like to opine that SI Noman Javed has serious character and disciplinary issues as well as lack of interest in policing. He, being a chronic drinker and womanizer would never be found strict against drug mafias, prostitution dens and other social evils. Moreover, he is not smart enough to contain his such personal activities to his own-self hence bringing a bad repute to police department in general. In view of the undersigned, SI Noman Javed may be posted out of Hazara Range and may never be posted on any field assignment in police organization. He simply is not fit for field work. However, he may be allowed to join any organization/department for any desk job, please.


(Bilal Ahmad) DSP
Superintendent of Police,
City, Mansehra
12/1/24

فائل شوکار ٹولس نمبر 09 مورخہ 22.01.2024

جناب صاحب ڈسٹرکٹ پولیس آفیسر صاحب ضلع کوہستان

جناب مال!

آجانب کی جانب سے ہڈی کر وہ ٹائیکل شوکار ٹولس میں سے سائیکل ہڈی کے حالات کے بارے میں حلیہ وصولی صورتی خدمت میں۔
 انعام نمبر 1: میں سائیکل کے بھرتے کی وجہ سے 15 نومبر 2023 کو اسٹیشن پر لاگو کی گئی اور اسے کوٹلی میں ہی ڈراؤن کر دیا گیا ہے۔ اس کے علاوہ آجانب نے
 حکم لیا ہے کہ کوٹلی میں سے سائیکل ہڈی ہٹا دی جائے۔ کوٹلی میں سائیکل ہڈی کے ریکارڈ کرنا۔ اب میں سائیکل، انعام ہڈی کیا ہے کہ میں نے ڈراؤن کر کے فریڈ سٹیشن کوٹلی میں
 تمہاری جانب سے ڈسٹرکٹ پولیس آفیسر کے حکم کو نبھایا۔

جناب: میں نے اپنے ڈسٹریکٹ پولیس آفیسر کی ہڈی کی کہ اسے جو کی فریڈ میں ماضی کی ہے۔ اس لیے جب میں بھی گئی تو وہی فریڈ کہا ہے کہ میرے گریڈ میں
 نان پیدائش کی وہ ٹیکہ ہڈی کرنے والا اور اس کے ہڈی کے لیے اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ ہڈی کی اسٹیشن پر لاگو کرنا ہے کہ میری ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 و خدمت حاصل کرو کہ کوٹلی میں ہڈی کے لیے اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 انعام نمبر 2: میں سائیکل کے انعام ہے کہ میں نے اپنے ڈسٹریکٹ پولیس آفیسر کے حکم کو نبھایا۔ 28.12.2023۔ 28.12.2023 میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔

جناب: جناب مال! یہ انعام سرکار کوٹلی میں 01.12.2023 کو ہڈی کو اسٹیشن پر لاگو کیا گیا ہے۔ اس کے لیے ہڈی کے لیے اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی
 ہے۔ میں نے SHO اور DSP صاحبان کے ٹولس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 30.11.2023 کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 کوہستان اور SP صاحب مل کر ہڈی کے ساتھ ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 28.12.2023 کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔

انعام نمبر 03: میں سائیکل کے انعام ہڈی کیا ہے کہ میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 جناب: جناب مال! یہ انعام سرکار کوٹلی میں 01.12.2023 کو ہڈی کو اسٹیشن پر لاگو کیا گیا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 انعامات سے ڈراؤن کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 ڈسٹریکٹ پولیس آفیسر کے حکم کو نبھایا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔

انعام نمبر 04: میں سائیکل کے انعام ہڈی کیا ہے کہ میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 جناب ڈی ایچ اے اسپا صاحب اور کوہستان کوٹلی میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔

جناب: یہ بات پیش در دست ہے کہ نمبر 01 ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔

انعام نمبر 05: انعام ڈی ایچ اے اسپا صاحب اور کوہستان کوٹلی میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔
 ڈسٹریکٹ پولیس آفیسر کے حکم کو نبھایا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔

جناب: اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس کے لیے ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔ اس میں ہڈی کو اسٹیشن پر لاگو کرنا ہے۔

ORDER

(24)

Annex - H

This is office order for disposal of departmental proceedings against SI Noman Javed No. H/142 (Suspended Police Lines Komilla) on the grounds that:

1. He was transferred and posted from Police Line Komilla to Incharge of Police Post Sumar Nalla and directed to ensure his arrival at duty place and his application for 15 days will be allowed after arrival in the new posting place, but he made his arrival by telephonically message and did not obey the order of the undersigned well in time at duty place.
2. That he remained absent from lawful duty without any prior information/permission of his seniors from 30-11-2023 to 28.12.2023.
3. From the perusal of his service record it transpired that he is habitual absentee and do not take interest in his official duties being a member of discipline force.
4. During the Enquiry, proceedings an another enquiry was also received from the office of W/Regional Police Officer, Hazara Region Abbottabad vide his Endst: dated 17.01.2024 for conclusive departmental proceedings and punishment. The finding report has been examined, wherein, after conducting of proper departmental enquiry, the E.O recommended in his finding report that.

DPO:K

"Keeping in view all the aforementioned facts, that SI Noman Javed has serious characters and disciplinary issues as well as lack of interest in policing. He being a chronic drinker and womanizer would never be found strict against drug mafias, prostitution dens and other social evils. Moreover, he is not smart enough to contain his personal activities to his own-self, hence, bringing a bad repute to police department and general. In view of enquiry officer, SI Noman Javed may be posted out of Hazara Range and may never be posted on any field assignment in police organization. He simply is not fit for field work." (Enquiry report is annexed).

Discipline Officer
Upper Komilla
29-1-2024

Copy Issue on
31-1-2024

SRC
31-1-2024

Departmental proceedings were initiated against him and Charge Sheet along with Disciplinary action was issued to him, vide this office Endst: No. 2572-73/PA dated 28.12.2023 and Mr. Sajjad Muhammad DSP/Dassu appointed as Enquiry Officer.

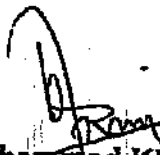
After conducting of proper departmental enquiry, the enquiry Officer, submitted his finding report, wherein he stated that the said SI has serious characters and disciplinary issues as well as irresponsible attitude, disinterested in his official duties and bringing bad repute to Police department in general public. Thus he found guilty of charges and recommended for major punishment.

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After perusal of finding report of the enquiry officer, Final Show Cause Notice issued to him and served upon him on 22.01.2024. The reply of Final Show Cause received and found un-satisfactory. Later on, the delinquent SI was called in "OR" for 26.01.2024, but he failed to compliance the order of the undersigned and not appeared. The undersigned give him another chance and again called on 29.01.2024 for hearing in person, but again he turned down the order and did not appear in "OR".

Keeping in view all the aforementioned facts, other material on record and enquiry finding report of SP City District Mansehra, the undersigned came to the conclusion that the alleged SI Noman Javed No. H/142 is guilty of the charges and there is no hope from him to become a good police officer in future. Therefore, the undersigned being a competent authority awarded him the major punishment of "Dismissal from Service" under Police Rules 1975, amended 2014 with immediate effect.

Order announced on 29.01.2024.


(Muhammad Khalid) PSP
District Police Officer,
Upper Kohistan.


No. 206-09/PA, dated 29/01/2024.

Copy of the above is forwarded for favour of information to the.

1. The Regional Police Officer, Hazara Region Abbottabad.
2. OSI/SRC DPO Office,
3. PAY Officer, DPO Office.

OB No. 14

Dated 29/01/2024.


District Police Officer,
Upper Kohistan
Upper Kohistan

26

Annex - I

**BEFORE THE REGIONAL POLICE OFFICER HAZARA REGION
ABBOTTABAD**

(Departmental Appeal by Numan Javed Sub Inspector No.H/142)

DEPARTMENTAL APPEAL AGAINST ORDER OB NO.14 DATED 29-01-2024 PASSED BY DISTRICT POLICE OFFICER UPPER KOHISTAN WHEREBY APPELLANT HAS BEEN AWARDED PUNISHMENT OF "DISMISSAL" FROM SERVICE.

PRAYER: ON ACCEPTANCE OF INSTANT DEPARTMENTAL APPEAL ORDER DATED 29-01-2024 MAY KINDLY BE SET ASIDE AND APPELLANT BE RE-INSTATED IN SERVICE FROM THE DATE OF DISMISSAL WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.

Respected Sir,

With most reverence the following few lines are submitted for your kind consideration and favorable orders:-

1. That appellant was inducted in KPK Police Department as PASI through Public Service Commission in the year 2011, thus have rendered about 13 years service. Appellant always performed his assigned duties with zeal, zest, devotion, dedication and honesty to the entire satisfaction of his officers and never provided a chance of reprimand. Appellant has meritorious service record at his credit.
2. That appellant is the only son of his parents having no sister or brother. Appellant's parents are aged and sick. There is no one at home except appellant to look after/care those ill parents.
3. That while appellant posted as I/C Police Post Sumar Nalla (District Upper Kohistan) was served upon with a Charge Sheet dated 28-12-2023 by the

Received

23.2.2024

District Police Officer Upper Kohistan and Mr. Sajjad Muhammad DSP appointed as Inquiry Officer. Appellant replied the Charge Sheet in detail and denied the allegations incorporated therein being incorrect and baseless. **(Copies of Charge Sheet & its reply are attached herewith as "A&B")**.

4. That thereafter on receipt of inquiry report the District Police Officer, Upper Kohistan issued the appellant with the Final Show Cause Notice dated 22-01-2024 which was replied with denial of allegations being incorrect, false and fabricated ones. **(Copies of Final Show Cause Notice and its reply are attached as "C&D")**.

5. That on receipt of so-called inquiry report the District Police Officer, Upper Kohistan awarded the appellant with the punishment of dismissal from service vide order OB No.14 dated 29-01-2024. **(Copy of dismissal order dated 29-01-2024 is attached herewith as "E")**.

6. That so far as the allegations No.1&2 mentioned in punishment order dated 29-01-2024 are concerned, in this respect it is stated that in those days the appellant was transferred from Police Lines Kamila to as Incharge PP Sumar Nalla. Due to illness of his father/wife, the appellant applied for 15 days leave which was allowed on the condition to firstly report for duty at new place of posting before proceeding. Obeying instructions of the DPO Upper Kohistan, the appellant after reporting

for duty as I/C PP Sumar Nalla informed his SHO before leaving Kohistan for Abbottabad on leave. Thus it is incorrect that appellant has availed leave without information or prior permission of his seniors. (Copies of Leave Application and Medical Treatment papers of appellant's fathers & wife are attached as "F & G" total 13 pages).

7. That allegation No.3 in the punishment is totally incorrect, baseless and against the available record of appellant. Throughout his entire service, the appellant never absented himself from his official duties for the reason there is nothing on record with regard to such allegations, hence allegations are vehemently denied.
8. That as regard the allegation No.4, is concerned, the same is bundle of false and fabrication allegations just to malign the appellant. There has been no such complaint throughout his entire service against the appellant from public or departmental sources. Appellant belongs to a respectable family enjoying good repute in the society and himself is also a gentleman. The charge like drinker and womanizer in the punishment against appellant without any proof is not only allegation but is answerable sine like "QAZAF" and punishable in Islamic Law. Allegations are the result of some personal enmity and vendetta of some of my private rivals who always try to approaches secretly the police high-ups, and to make false complains just to damage my service record

otherwise there is no one to come forward and own such allegations.

9. That appellant has done his duties with dexterity and honesty; he arrested a number of criminals during his posting as SHO at different Police Stations. For his tremendous services his high-ups have awarded him with cash rewards and commendation certificates. (A few of them are attached herewith as a token of proof "H").

10. That no proper departmental inquiry was conducted. Neither a witness was produced before the inquiry officer in presence of appellant to depose about allegations with which he was charged nor was he provided with a chance to cross examine such a witness. In support of charges leveled against appellant no such documentary evidence was brought on record nor was he confronted with such document if any. Copy of enquiry report, if any, was not issued to the appellant. Even opportunity of personal hearing was not provided but appellant was awarded with major punishment of dismissal from service in serious violation of law, departmental rules & regulations, facts and principle of natural justice.

11. That appellant is totally innocent and has never committed any such act as alleged against him. There is nothing wrong on the part of appellant.

30

-5-

That if the appellant is provided with a chance of personal hearing, he will really prove himself as innocent by explaining all the facts and circumstances of the matter.

In view of the above facts it is earnestly requested that order dated 29-01-2024 of the District Police Officer, Upper Kohistan may kindly be set aside and the appellant be re-instated in service from the date of dismissal with all consequential service back benefits. Appellant shall pray for your good health and long life.

Yours Obedient Servant

(Noman Javed)

Ex-Sub Inspector No. 142/H
KPK Police at Abbottabad.

Address: House No.343/5 Upper
Malikpura Neer Quali Khan
Abbottabad.
Cell No. 0311-6669666

Dated : 23-02-2024



OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

0992-9310021-22

0992-9310023

r.poliuzara@gmail.com

NO: 2571-92/PA DATED 13/05/2024

ORDER

This order will dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex-SI Noman Javed No: 142/H of district Upper Kohistan against the order of punishment i.e. *dismissal from service* awarded by DPO Upper Kohistan vide OB No.14 dated 29.01.2024.

Brief facts leading to the punishment are that the appellant:

1. He was transferred and posted to PP Sumar Nila but he made his arrival through telephonic message and disobeyed the order of DPO Upper Kohistan.
2. He remained absence from duty without any leave or permission from 30-11-2023 to 28-12-2023 (28 days).
3. Perusal of his service record shows that he is a habitual absentee and do not take interest in official duties.
4. He has serious character and disciplinary issues which includes lack of interest, a chronic drunker, womanizer, never be found strict with drug mafias and prostitution dens as a result brought bad name for department."

The appellant was issued charge sheet along with summary of allegations and DSP Dasso, Upper Kohistan was deputed to conduct departmental enquiry. The EO in his findings held the appellant responsible of misconduct. In addition to this, SP City Manshera in similar enquiry also held that the appellant has serious character and disciplinary issues. Consequently, DPO Upper Kohistan in light of both the enquiry reports awarded him major punishment of *dismissal from service*. Hence, the appellant submitted this present appeal.

After receiving his appeal, comments of DPO Upper Kohistan were sought and examined/perused. The undersigned called the appellant in OR and heard him in person. He was given reasonable opportunity to defend the charges leveled against him however, the appellant failed to advance any reasonable justification in his defense. Such actions not only tarnish image of the Police in general public, but also promotes undisciplined behavior in Police force.

32

~~31~~

Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-4 (a) of Khyber Pakhtunkawa Police Rules, 1975 the undersigned is constrained to uphold the punishment of dismissal from service awarded by DPO Upper Kohistan while the instant appeal is hereby *rejected/*filed with immediate effect.



TAHIR AYUB KHAN (PSP)
Regional Police Officer
Hazara Region, Abbottabad

No. 2591-92 /PA; dated Abbottabad the 13/5 2024.

Cc.

DPO Upper Kohistan for information and necessary action with reference to his office Memo No 410/Legal dated 14-03-2024. Service Record and fuji missal of the appellant is returned hcrewith for record.

OSIS- 92132M4
February 2024
33
Annex "K"

BEFORE THE KPK PROVINCIAL POLICE OFFICER
PESHAWAR

(Revision petition by Ex-Sub. Inspector Numan Javed H/142, KPK)

CR# 17/50
28/01/24

REVISION PETITION AGAINST ORDER DATED 29-01-2024 OF THE DISTRICT POLICE OFFICER UPPER KOHISTAN WHEREBY PETITIONER WAS AWARDED WITH PENALTY OF "DISMISSAL FROM SERVICE" AND ORDER DATED 13-05-2024 OF THE REGIONAL POLICE OFFICER HAZARA REGION ABBOTTABAD WHEREBY PETITIONER'S APPEAL HAS BEEN REJECTED AGAINST THE LAW, DEPARTMENTAL RULES & REGULATIONS AND FACTS.

PRAYER: ON ACCEPTANCE OF INSTANT REVISION PETITION ORDER DATED 29-01-2024 OF DPO UPPER KOHISTAN AND ORDER DATED 13-05-2024 OF THE RPO, HAZARA REGION, ABBOTTABAD MAY GRACIOUSLY BE SET ASIDE AND PETITIONER BE RE-INSTATED IN SERVICE FROM THE DATE OF DISMISSAL WITH ALL SERVICE BACK BENEFITS.

Respected Sir,

With reverence and humble submission the following few lines are laid down before your highness for kind consideration and favorable orders please:-

1. That appellant was inducted in KPK Police Department as PASI through Public Service Commission in the year 2011; thus have rendered about 13 years service. Appellant always performed his assigned duties with zeal, zest, devotion, dedication and honesty to the entire satisfaction of his officers and never provided a chance of reprimand. Appellant has meritorious service record at his credit.

2. That appellant is the only son of his parents having no sister or brother. Appellant's parents are aged and sick. There is no one at home except appellant to look after/care those ill parents.
3. That while appellant posted as I/C Police Post Sumar Nallo (District Upper Kohistan) was served upon with a Charge Sheet dated 28-12-2023 by the District Police Officer Upper Kohistan and Mr. Sajjad Muhammad DSP appointed as Inquiry Officer. Appellant replied the Charge Sheet in detail and denied the allegations incorporated therein being incorrect and baseless. (Copies of Charge Sheet & its reply are attached herewith as "A&B").
4. That thereafter on receipt of inquiry report the District Police Officer, Upper Kohistan issued the appellant with the Final Show Cause Notice dated 22-01-2024 which was replied with denial of allegations being incorrect, false and fabricated ones. (Copies of Final Show Cause Notice and its reply are attached as "C&D").
5. That on receipt of so-called inquiry report the District Police Officer, Upper Kohistan awarded the appellant with the punishment of dismissal from service vide order OB No.14 dated 29-01-2024. (Copy of dismissal order dated 29-01-2024 is attached herewith as "E").
6. That aggrieved of the order of DPO Upper Kohistan the petitioner preferred a departmental appeal

7

35

before the Regional Police Officer, Hazara Region, Abbottabad on 23-02-2024, however, the appellate authority without taken into consideration the grounds of appeal advanced by petitioner and facts of the matter rejected the appeal vide order dated 13-05-2024 in violation of departmental rules, regulations and circumstances of the matter. (Copies of Departmental Appeal dated 23-02-2024 and its rejection order dated 13-05-2024 are attached as "F & G").

7.

That so far as the allegations No.1&2 mentioned in punishment order dated 29-01-2024 are concerned, in this respect it is stated that in those days the appellant was transferred from Police Lines Komila to as Incharge PP Sumar Nalla. Due to illness of his father/wife, the appellant applied for 15 days leave which was allowed on the condition to firstly report for duty at new place of posting before proceeding. Obeying instructions of the DPO Upper Kohistan, the appellant after reporting for duty as I/C PP Sumar Nalla informed his SHO before leaving Kohistan for Abbottabad on leave. Thus it is incorrect that appellant has availed leave without information or prior permission of his seniors. (Copies of Leave, Application and Medical Treatment papers of appellant's fathers & wife are attached as "H & I" total 13 pages).

8. That allegation No.3 in the punishment is totally incorrect, baseless and against the available

record of appellant. Throughout his entire service, the appellant never absented himself from his official duties for the reason there is nothing on record with regard to such allegations, hence allegations are vehemently denied.

9.

That as regard the allegation No.4, is concerned, the same is bundle of false and fabrication allegations just to malign the appellant. There has been no such complaint throughout his entire service against the appellant from public or departmental sources. Appellant belongs to a respectable family enjoying good repute in the society and himself is also a gentleman. The charge like drinker and womanizer in the punishment against appellant without any proof is not only allegation but is answerable sine like "QAZAF" and punishable in Islamic Law. Allegations are the result of some personal enmity and vendetta of some of my private rivals who always try to approaches secretly the police high-ups and to make false complains just to damage my service record otherwise there is no one to come forward and own such allegations.

10.

That appellant has done his duties with dexterity and honesty; he arrested a number of criminals during his posting as SHO at different Police Stations. For his tremendous services his high-ups have awarded him with cash rewards and

commendation certificates. (A few of them are attached herewith as a token of proof "J").

11. That no proper departmental inquiry was conducted. Neither a witness was produced before the inquiry officer in presence of appellant to depose about allegations with which he was charged nor was he provided with a chance to cross examine such a witness. In support of charges leveled against appellant no such documentary evidence was brought on record nor was he confronted with such document if any. Copy of enquiry report, if any, was not issued to the appellant. Even opportunity of personal hearing was not provided but appellant was awarded with major punishment of dismissal from service in serious violation of law, departmental rules & regulations, facts and principle of natural justice.
12. That appellant is totally innocent and has never committed any such act as alleged against him. There is nothing wrong on the part of appellant.
13. That if the appellant is provided with a chance of personal hearing, he will really prove himself as innocent by explaining all the facts and circumstances of the matter.

In view of the above facts it is earnestly requested that order dated 29-01-2024 of the District Police Officer, Upper Kohistan and order dated 13-05-2024 of the RPO, Hazaara Region, Abbottabad may kindly be set aside and the appellant be re-

A - 38

instated in service from the date of dismissal with all consequential service back benefits. Appellant shall pray for your good health and long life.

Yours Obedient Servant



(Noman Javed)

Ex-Sub Inspector No. 142/H
KPK Police at Abbottabad.

Address: House No.343/5 Upper
Malikpura Neer Quail Khan
Abbottabad.
Cell No. 0311-6669666

Dated : 23-05-2024



39

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

Annex-2

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-SI Noman Javed No. 142/H (hereinafter referred to as petitioner).

The petitioner was awarded major punishment of dismissal from service by DPO Kohistan Upper vide OIB No. 14, dated 29.01.2024 on the following allegations:

1. He was transferred & posted to PP Sumar Nala but he made his arrival through telephonic message & disobeyed the order of DPO Kohistan Upper.
2. He remained absent from duty without any leave or permission from 30.11.2023 to 28.12.2023 (28 days).
3. Perusal of his service record showed that he is a habitual absentee and do not take interest in official duties.
4. He has a serious character & disciplinary issues which includes lack of interest, a chronic drunk, womanizer, not strict with drug mafias and prostitution dens as a result brought bad name for department.

The Appellate Authority i.e. RPO/Hazara rejected his appeal vide Order Endst: No. 2591-92/PA, dated 13.05.2024.

A meeting of Appellate Board was held on 28.08.2024 in CPO under the chairmanship of DIG Headquarters. Ex-SI Noman Javed No. 142/H was present.

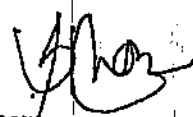
By taking lenient view his major punishment from dismissal is being converted into major punishment of reduction in rank from his substantive rank of SI to ASI. He is reinstated into service with immediate effect.

Sd/-
AWAL KHAN, PSP
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. SI 2430-25 24, dated Peshawar, the 25-09-2024.

Copy of the above is forwarded to the:

1. Regional Police Officer, Hazara. Service Record - Service Book, Service Roll along with Fauji including Enquiry No. 15-331/2022 of FIA/CCRC, Abbottabad 125 pages & Upper Kohistan Original Enquiry File (75 pages) received vide letter No. 3250/PA, dated 14.06.2024 is returned for your office record.
2. District Police Officer, Kohistan Upper.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: I-II-III, CPO Peshawar.


(SONYA SHAMROZ KHAN)
PSP
AIG/Establishment,
Inspector General of Police,

District Police Officer,
Abbottabad.

Dated 30/09/2022

[Signature]

OB No. 254

For his good performance
in recognition of

District AID

Son of

Shri. Noman Javed I/c. A.C.L.C.

DISTRICT POLICE OFFICER ABBOTTABAD.

Granted by

CLASS III

Commendation Certificate



KHYBER PAKHTUNKHWA POLICE

AMNS 5 M.

40

KHYBER PAKHTUNKHAWA POLICE



Commendation Certificate
CLASS III
Granted by

DISTRICT POLICE OFFICER ABBOTTABAD.

To Mr. Noman Javed SHO PS Mardan

Son of

District

Abbottabad

In Recognition of

For

His

Good

Performance

during

Election 2022

1.1.2022

OB No.

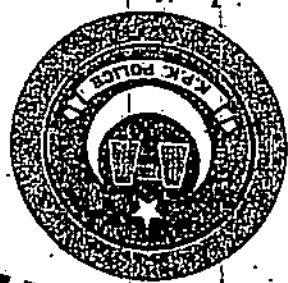
95

Dated 25-04-2022

District Police Officer,
Abbottabad

(11)

KHYBER PAKHTUNKHAWA POLICE



Commendation Certificate
CLASS III

Granted by

DISTRICT POLICE OFFICER ABBOTTABAD.

To: **SI Noman Iqbal SHO Muzaf**

Son of

District **Muzaf**

In Recognition of

for his Good Performance in case FIR No
65 Dated 3/22 4/3 302 PC. B. Muzaf

OB No

40

Dated **9.2**

20 21

District Police Officer,
Abbottabad.

(42)

43

KHYBER PAKHTUNKHAWA POLICE



Commendation Certificate

CLASS III

Granted by

DISTRICT POLICE OFFICER ABBOTTABAD.

To SI Nouman Javed SHO B Cantt

Son of _____

District Abbottabad


In Recognition of

For his good performance during
Muharrama-2021 & Containment Election
2021

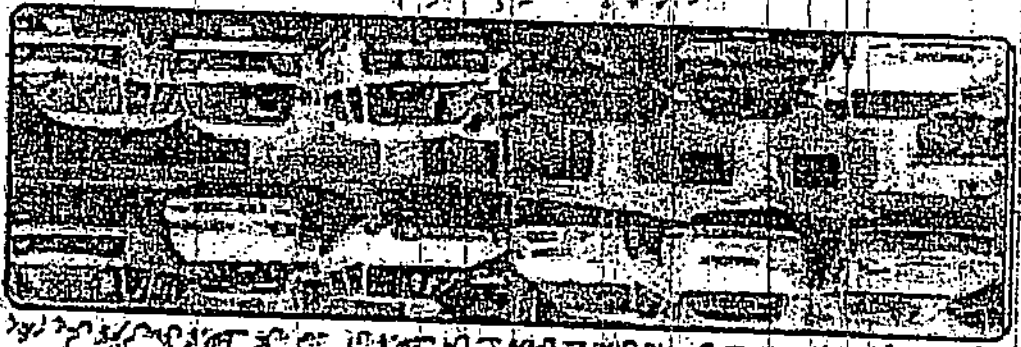
OB No. 288

RS = 3000/-

Dated 21-9-2021


District Police Officer,
District Abbottabad.

הנהגות ודרכי חיים

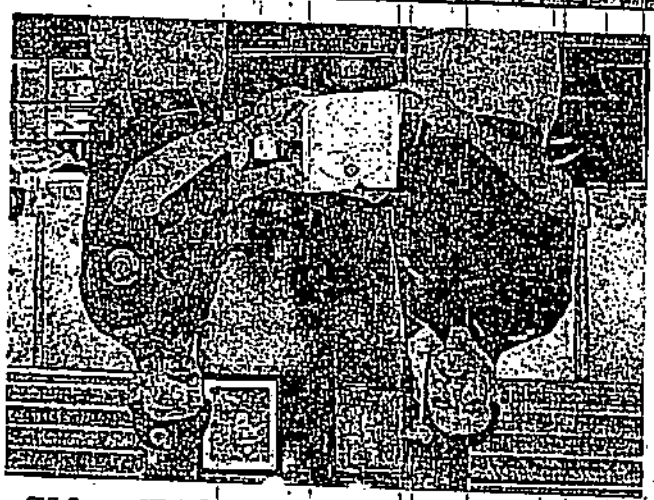
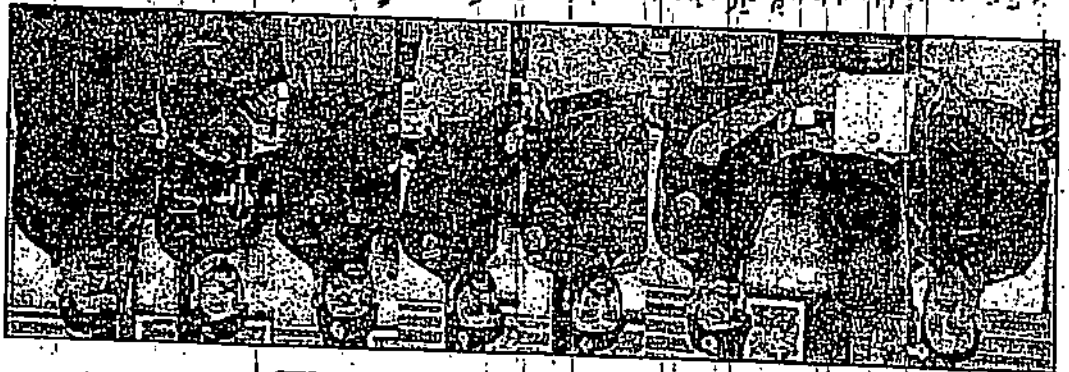


הנהגות ודרכי חיים
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הנהגות ודרכי חיים

הנהגות ודרכי חיים

Handwritten text in a cursive script, possibly Hebrew or Arabic, covering the majority of the page. The text is dense and appears to be a list or a series of entries. Some words are underlined or circled. The script is somewhat difficult to decipher due to the high contrast and graininess of the scan.

(Sh)

512
Smt. J. ...
Smt. J. ...
Smt. J. ...

30 / 11 / 2023
DSP Circle Dastu

~~Approved~~
Approved after his arrival
in the new posting place

Sir Forwarded

192-11
51

...
...
...
...
...

(46)

0300-9111740
0331-9111740
0321-9111740

(47)

سر جن ڈاکٹر طاہر حبیب

ایم بی بی ایس (پشاور)، ایم ایس (اسلام آباد)

شعبہ سرجری ڈی ایچ کیو ہسپتال ایبٹ آباد

اوپن ڈی۔ بدھ

Pt. Name: Javed Iqbal

Age: 70 yrs

Sex: ♂

Date: 16/12/2023

Clinical Record

Rose

Ch.
Pain abdomen
2 frequency
of Micturition
+2

Known patient of
DM P & HTN

O/B
Tends low
abdomen

- ~~U/E~~
- VIS KUB
- PSA

(Signature)

Tad Pwrtreaty
New
Tad Fm Sen

Tad No Sym
Tad Neef

Sx Indylm L

Sx Hydylm M

(Signature)

NOT VALID FOR COURT

نوید کلینک لنک روڈ، بالمقابل سول ہسپتال ایبٹ آباد

0300-9111740
0331-9111740
0321-9111740

(48)

نمبر جن ڈاکٹر طاہر حبیب

ایم بی بی ایس (پشاور)، ایم ایس (اسلام آباد)

شعبہ جری ڈی ایچ کیو ہسپتال ایبٹ آباد

اوپن ڈی-بده

Pt. Name: Tawad Iqbal Age: 70 Sex: M Date: 23/1/23

Clinical Record

Roe

cs
B.P.H
e. Pain RHC
Anti osteoarthritis
A
CBC
uric acid
PSA
(Signature)

Q
Tad of treatment
w/s
Tad No S/S
w/s
Tad ALP 057
Tad New
Tad Ca 100 Ph
w/s
Sx Trivalent
2 - 2

NOT VALID FOR COURT

نوید کلینک ٹراک روڈ، بالمقابل سنول ہسپتال ایبٹ آباد
(Signature)

DEPARTMENT OF RADIOLOGY
BBS Teaching Hospital Abbottabad
 PH # 0992-9310191

49

Dr. Ajmal Mehmood
 M.B.B.S. D.M.R.D.
 Radiologist



Dr. Mazhar Ud Duha
 Dr. Seema
 Dr. Sadaf
 Dr. Sh. Rizwana
 M.B.B.S.

Patient Name: Javed Iqbal Age: _____ Sex: M
 Date: 15/12/22 OPD/Ward: _____

ULTRASOUND REPORT

LIVER: *Fatty changes*
 Is of normal size shape and echopattern. it is <15cm in AP dimension.
 No focal defect seen in the liver. Portal vein is not dilated.

BILIARY System:
 Gall bladder is normally distended, no sludge or mass seen, CBD is of normal caliber, No dilatation of intrahepatic biliary Channels seen.

Pancreas:
 Normal size and echogenicity. No dilatation of pancreatic duct seen.

Spleen:
 Normal, size shape and echogenicity, No focal defect seen. Index <45.

Right Kidney: *Normal*
 Is normal in contour, size and echopattern. No focal defect, calculus, hydronephrosis. Corticomedullary differentiation intact.

Left Kidney: *Mild Hydronephrosis + Dilated Renal Pelvis*
 Is normal in contour, size and echopattern. No focal defect, calculus, hydronephrosis. Corticomedullary differentiation intact.

Urinary Bladder:
 Normally distended, No calculus seen.

General Abdomen:
 No Para-aortic or mesenteric Lymphadenopathy seen.
 No Ascitic fluid Seen

COMMENTS

Pre-voidal Urine volume: *normal*
 Post-voidal: *normal*

Mild fatty changes in Liver, Left kidney shows increased parenchymal thickness with mild hydronephrosis.

Prostate not enlarged.

Dr. Ajmal
 Signature

HAMDARD LABORATORY

50



NAME: Javaid Iqbal
LAB NO: 9012/23
Ref BY: Self

AGE/SEX: Male
DATE: 16/12/2023

HAEMATOLOGICAL PARAMETER

		REFERENCE VALUE
• HAEMOGLOBIN:	12.8	G/dl (M: 13.5-18.0, F: 12.0-16.5)
• PLATELETS COUNT:	2,82,000	/cmm (150,000-400,000)
• RED CELLS COUNT:	4.28	/cmm (M: 4.5-6.0, F: 4.0-5.5)
• RETICULOCYTES COUNT:		% (Adult : 0.5-2.0, Infants: 2-5)
• WBC COUNT:	13,500	cmm (4000 - 11,000)
• DEFFERENTIAL LEUCOCYTE COUNT		
Neutrophil	74.2	(Adult: 40-70%) (Children: 50-70 %)
Lymphocytes	22.7	(Adult: 20-45%) (Children: 20-40 %)
Monocytes	3.1	(Adult 1-15 %) (Children: 1-15)
Eosinophils:		(1-4)
Basophils	%	
Blast Cells	%	
Promyocytes	%	
Myelocytes	%	
Metamyocytes	%	
Nucleated RBCs		/100 WBCs
• ABSOLUTE VALUES		
PCV	35.9	(M: 38-54, F: 35-46)
MCV	82.6	(80-96)
MCH	30.2	(26-32)
MCHC	34.9	G/dl (31-37)
• ESR	***	mm1st hr (Male 0-9, Female 0-15 mm1st hr)

0315-5900089

Zarbat Medical Center
Opp: Women Children Hospital, Gami Adda Abbottabad.

24 7

HAMDARD LABORATORY

(51)



Name: Javid Iqbal
Lab No. 9012/23
Ref By: Self

Age / Sex Male
Date: 16/12/2023

PSA

Test

Result

Prostate Specific Antigen (By Device Method)

Positive (+ive)

0315-5900089

Zarbat Medical Center
Opp: Women Children Hospital, Gami Adda Abbottabad.

24 7

Dr. Sadia Yaqoob

53

M.B.B.S, M.C.P.S (Trained)
Women Medical Officer
Benzer Women & Children Teaching Hospital
Abbottabad

ڈاکٹر سعدیہ یعقوب
ہزارہ ماہی و کھیتی باڑی
PMDC No. 18828-N



Mrs. Norman

Date: 7-11-23

P₄ Ab₂ Ad₄ ← ♂ (All SVDs)
♀ (3)

B.P. = $\frac{170}{100}$
Pulse = 100 b/min
Temp = 99°F

ACI

- G. body aches
- Fever
- Severe Headache
- Epigastric pain

Past Hx:

- Known Diabetic → 2 1/2 yrs
- Known HTN → 2 yrs

Rx:

→ Admit in hospital for
observation + B.P. monitoring

(But Pt. refused due to domestic issues)

1 Inj. R. lact 100cc + Inj. Lasix x 40mg + 2 ampules
Cobalamine $\alpha/1/10$ stat
(slowly)

✓ Tab. Sofvase x 10mg x P/O x stat then O.D.

✓ Inj. Traumal/metamide $\alpha/1/m$ x stat then SOS

1 Inj. Placidia 100ml + Inj. Onset (8mg) $\alpha/1/10$ x stat
then O.D. (4 days)

✓ Inj. Provas $\alpha/1/10$ x stat then SOS.

✓ Inj. Ceflactem x 1g/m $\alpha/1/10$ x stat (ATD)

✓ Tab. Glucovance $\alpha/1/0$ x B.D. then B.D. (for 5 days)

1 B.P. Sugar Record

Not Valid For Court

HAZARA LABORATORY



54
ہزارہ
لیبارٹری

Fully Automated & Computerized Lab
The Facility for all routine and special test
are available.

0305-5991168

Name:	MRS NOMAN	Age / Sex	FEMALE
Lab No:	002	Date:	7.11.2023
Ref By:	DR. SADIA		
URINE EXAMINATION REPORT			

PHYSICAL EXAMINATION:

Quantity	10ml
Colour	YELLOW
pH	6.0
Specific Gravity	1.020

CHEMICAL EXAMINATION:

Albumin	→	(+)
Sugar	→	(++)

MICROSCOPIC EXAM:

RBCs	NIL	/HPF
Pus Cells	→ 14-16	/HPF
AMORPHOUS URATES	NIL	/HPF
Epithelial cells	(+)	/HPF
Calcium Oxalate	NIL	/HPF



NEAR VCH HOSPITAL & GEO FOAM CAMI THE MALL ABBOTTABAD

Not Valid for use in any Court of Law

55

HAZARA LABORATORY



ہزارہ لیبارٹری

Fully Automated & Computerized Lab
The Facility for all routine and special test
are available.

0305-5991168

Name:	MRS NOMAN	Age/Sex:	Female
Lab No:	002	Date:	7.11.2023
Ref:	DR. SADIA		

HbA1c

TEST	RESULT
HbA1c	6.5%

HbA1c cutoffs for diagnosing diabetes

- 1.3% - 5.6% = Normal
- 5.7% - 6.4% = Increased risk of diabetes
- >6.4% = Diabetes

HbA1c goals in treatments of diabetes

- Ages 0-6 Years 7.6% - 8.4%
- Ages 6-12 Years <8%
- Ages 13-19 Years <7.5%
- Adults <7%



Lab Technician

NEAR WCH HOSPITAL & GEO FOAM GANI THE MALL ABBOTTABAD
Not Valid for use in any Court of Law

Dr. Sadiya Yaqoob

(56)

M.B.B.S, M.C.P.S (Trained)
Women Medical Officer
Benizer Women & Children Teaching Hospital
Abbottabad

ڈاکٹر سادیہ یعقوب
ہزارہ خواتین اور بچوں کی
PMDC No. 19826-N



Date: 13-11-23.

Mrs. Norman

Py Abs. Aily (LAD SVDs)
♀ (3)

Known Diabetic
2 1/2 years
Known HTN

A/c:

- Palpitation
- Follow up visit

B.P = 140/90

Pulse = 100 b/min

Rx:

Tab. Sofnasac x 10mg
⊖ ← ایہ دوا لیں

Ado

Tab. Glucosvance
⊖ ← 1PI

CBC

RBS

FBS

Tab. Inderol x 10mg
⊖ ← ایہ دوا لیں

→ Pinkoffee Sachet

Cap. Nezikil x 600mg
⊖ ⊙ ← 1PI

⊖ ⊙ ← ایہ دوا لیں

Cap. Omega x 40mg
⊖ ⊙ ← ایہ دوا لیں

Ado

⊖ ⊙ ← کل ڈیٹا م ٹریٹ
⊖ ⊙ ← مینٹی سے دینا لیں
⊖ ⊙ ← دوسری ادویات ڈاکٹر کی ہدایت
⊖ ⊙ ← مطابق استعمال کریں

Not Valid For Court

HAZARA LABORATORY



ہزارہ
لیبارٹری

Fully Automated & Computerized Lab
The Facility for all routine and special test
are available.

0305-5991168

Name:	MRS NOSHAN	Age / Sex	FEMALE
Lab No.	002	Date:	13.11.2023
Ref By:	DR SADIA		

Test Reports

HAEMATOLOGICAL PARAMETER		
TEST	RESULT	REFERENCE VALUE
Hemoglobin:	10.0g/dl	(M:12-16) (F:12.0-14.0)
Total Leucocyte Count:	9.000 /cmm	(4000-11,000)
DIFFERENTIAL LEUCOCYTE COUNT		
Neutrophil:	65.6%	(Adult: 40-75%) (Children: 20-50%)
Lymphocytes:	24.9%	(Adult: 20-45%) (Children: 50-75%)
Monocytes:	7.3%	(Adult: 2-7%) (Children: 6-12)
Eosinophils	2%	
Blast Cells:	** %	
Promyocytes:	** %	
Myelocytes:	** %	
Metamyelocytes:	** %	
I:SR:	***	mm/1st Hr (Male:0-9, Female:0-15)
Platelets Count:	2.10,000	150,000—350,000
ABSOLUTE VALUES		
MCV	71.4fl	(80-96)
MCH	25.1pg	(27-32)
MCHC	35.2g/dl	(30-35)
ESR	***	mm/1st Hr (Male: 0-10 Female: 0-)



NEAR WCH HOSPITAL & GEO FOAM GANI THE MALL ABBOTTABAD

Not Valid for use in any Court of Law

24/11/2024 14:18 PM

Print

24/11/2024

14:18

Abbottabad
GPO

RGL117652135

20 0

NOMAN JAVED
ATD
ABBOTTABAD
0000000000000000

DPO
KOHISTAN
Kohistan
0000000000000000

60

0

0

0

0

60

EJAZ_ABTGPO
FTN: 9010405

58

MEDICAL TEACHING INSTITUTION ABBOTTABAD

Ayub Teaching Hospital, Phone: 0992-920174, Fax: 0992-380328
 Email: info@ath.gov.pk, Website: www.ath.gov.pk

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Invoice

Patient Name : NOMAN JAVED
 Patient/Attended Name : JAVED IQBAL
 Sex : Male Age : 35 Year(s)
 Date of Birth : 24-01-1989 NIC.#: 1310185517009
 Hospital No : K042400005162 Bed #: K040221
 Department : UROLOGY-(Urology-009)
 Address : Upper malpura house no 343/5 muhalla qail khan
 Abbottabad Pakistan
 Phone : 92 0311 6669666

Medical Record No. : 000-03607489
 Order # : 24-0011040
 Invoice # : K04240270962
 Invoice Date : 24-JAN-2024 12:22 PM
 Receipt # : K04240092297
 In House Doctor : DR. NASIR JAMIL

Sl No	Qty	Actual Price	Start Charges	Discount	Amount	Report Date	Doctor Name
NO	1	70.00			70.00		
Total Amount					70.00		
Cash					70.00		

MEDICAL TEACHING INSTITUTION ABBOTTABAD

Ayub Teaching Hospital. Phone: 0992-920174, Fax: 0992-380328

Email: info@ath.gov.pk, Website: www.ath.gov.pk

DISCHARGE SUMMARY

60

Medical Record Number: K040003807489
Name: Noman Javed
Gender: Male
Age: 35 Year(s)
Address: Upper Mall, Pura House No 343/5, Muhallah Qall Khan, Abbottabad, Pakistan
Home Phone: [blank]
Mobile Phone: [blank]

Ward / Bed : UROLOGY/Urology-009
Admission No : K042400006162
Admission Date : 24-JAN-2024 12:22:20
Admission Status : Elective
Discharge No : 24000006505
Discharge Date : 26-JAN-2024 12:00:46
Discharge Status : Improved
Primary Consultant : NASIR JAMIL
Admitting Consultant : NASIR JAMIL

Diagnosis During This Admission :

26-JAN-24 11:59:46 LEFT URETERIC COLIC

Background Medical Problem(s) (List any chronic medical conditions that the patient may have, such as diabetes mellitus, asthma, hypertension etc.):

Reason for Admission:

LEFT URETERIC COLIC

Management During Admission :

AS PROTOCOL

Diagnostic & Therapeutic Procedures Performed :

ALL BLIS

Condition at Discharge:

IMPROVED

Instructions:

Adv: Review after 02 weeks.

Re.
Cap Pamsolun
3Ch ①
Tab Domini DS
1+1
Tab Leglox 500mg
w/h ①

60

Adv.

complete rest for one week

Electronically verified, no signature(s) required.

Maryam Wisal Khan
House Officer
PMDC/PNC: 4738

[Signature]

attested by SKM

DR. FAHEEM-UL-HAQ
MBBS, FCPS (Urology)
Assistant Professor Urology
Ayub Medical College



MEDICAL TEACHING INSTITUTION, ABBOTTABAD

Ayub Teaching Hospital, Phone: 0992-920171, Fax: 0992-380328
Email: info@ath.gov.pk, Website: www.ath.gov.pk

Token No : 095

(61)

Room No :

Department : UROLOGY

Date : 24-JAN-24 11:23:57

Dept Fee : 30

User : NOHMAN KHAN

MRNO : K0400003807489

Invoice No : K04240269061

Sex : Male

OPD Prescription form

Name : Noman Javed
Father Name : PARVEZ IQBAL
Husband Name :
Age : 35 Year(s) 00 Month(s) 00 Day(s)
AIC #
Patient Type : REGULAR

Investigation:

B/L of Urine pair

Hx of UTI
ESWL

Δ (L+) Metamizolide Colic

Plan
Admit in Urology
Ward for Observation

(Advised by Dr. Faheem)

Dr. Muhammad Ali
PG Urology
Ayub-MTI Abbottabad

10/11/42
H. H.

10/11/42
H. H.

10/11/42
H. H.

Monty

Handwritten text in Hindi, possibly a name or title.

Handwritten text in Hindi.

Handwritten notes in Hindi, including a date '23/11/24' and other illegible text.

DSP - HQ
23-01-2024

Forwarded file

Handwritten notes in Urdu script, including the word "اللہ" (Allah).

Handwritten notes in Urdu script, including the word "میں" (me).

Handwritten text "۶۴ - ۶۵"

64

ڈیپارٹمنٹ کے ذریعے نقل فرم (14 ستمبر 2023) کے ذریعے

14 ستمبر کو ایف ڈی آر کے ذریعے ڈیپارٹمنٹ کے ذریعے
ڈیپارٹمنٹ کے ذریعے ڈیپارٹمنٹ کے ذریعے
ڈیپارٹمنٹ کے ذریعے ڈیپارٹمنٹ کے ذریعے

ڈیپارٹمنٹ

ڈیپارٹمنٹ

ڈیپارٹمنٹ

ڈیپارٹمنٹ

ڈیپارٹمنٹ



OUTDOOR PATIENT TICKET (OPD)



CRP. No. 6290 S. No. _____
 Health Facility OHCP District CH
 Name: Noman Jamil Age 35y Sex M Contact No: _____
 Father's/Husband's Name: _____ Address: _____
 Monthly OPD S.No _____ Date: 23/01/24

(S)

Vitals:
 Temp: _____ °F
 Pulse Rate: _____ /Min
 Resp. Rate: _____ /Min
 B.P: _____ mmHg
 SPO2: _____ %

Chief Complaints:
 => B/L flank pain
 => Burning micturition
 => Vomiting

Investigations:
Urine R/E

Clinical Findings:
 Allergies if any: _____

U/S KUB

Provisional Diagnosis: (L) Renal calculi

Treatment: Pass Yu line
inj. Tramal + gabapate
Yuxstat

Results: _____

Revisit: inj. N/S - 500ml
Yuxstat

Referral: inj. Oxidol - 15
Yuxstat (ATD)

DISTRICT HEADQUARTER HOSPITAL DASSU UPPER KHISTAN

ULTRASOUND REPORT:

Patient Name: Nauman Javed Age: 35 y

Date: 23 (01) 2024

Referred by: _____

Liver:

Normal in size and echotexture. Surface of liver is smooth, IHBR and vascular channels not dilated. Portal vein and CBD is normal.

Gall Bladder:

Is normal without evidence of calculi, wall thicken or pericholecystic fluid.

Pancreas:

To extent visualized, appears normal in size, contour and echogenicity.

Spleen:

Measures normal in size, shape, contour and echo pattern. No evidence of mass or focal lesions.

Right kidney:

Is normal in size, position, and shape and echo pattern. Corticomedullary differentiation is maintained. No evidence of calculi or hydro nephrosis.

Left Kidney: 3mm calculus noted at upper pole of left kidney
Is normal in size, position, shape and echo pattern. Corticomedullary differentiation is maintained. No evidence of calculi or hydro nephrosis.

Urinary Bladder:

Urinary Bladder is distended, showing normal wall thickness. No evidence of calculi, mass or morol lesion.

- No evidence of mesenteric lymph nodes enlargement.
- No evidence of ascites.

(68)

تعمیر کو مسترد کر دیا گیا ہے۔

23

24

24

18

18-10-2014

18-10-2014

18-10-2014

18-10-2014

(47)

طابعی

طابعی

KC

MH-P-Line-Keoni

Police Line

Mohini Khatkar

99.12.23
MMP & P
Police Post
→
- 60

206.40
29/12/23
29/12/23
29/12/23

29/12/23
29/12/23
29/12/23

علم انبروستان

69

تقریباً 8 روزہ اور تاریخ 23/12/28

مردہ کافر نے لہان خان کے 23/12/28 وقت سے 20 بجے میں

میرزا خورشید حوالہ - اور تاریخ 23/12/28 طرف آجیوں دوران

رفت میرے والد سے یہاں پوسٹ سے جکی وہ سے ہزار

وقت پر طرف اسکا والد سے کجا کلام صلح میں

موقوف رہا اب کافر آجیوں حالت تارخ روز تاریخ ہے

تقریباً 8 روزہ و یہاں پوسٹ سے لہان خان کے طرف

میں ارسال ہے

جانا - جانے

تقریباً 8 روزہ



M.M. P.P.S. Nalder

28-12-28

31-01-2024

کتابخانه

کتابخانه

کتابخانه

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کتابخانه

70

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WAKALATNAMA


(Power of Attorney)

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

NOMAN JAVED Vs. IGP & TWO OTHERS


"SERVICE APPEAL"


I/ We the undersigned (Apellant) in the above titled Service Appeal, do hereby appoint and constitute Mr. Ahmad Sultan Tareen, Mudassir Ali Advocates High Court, Peshawar, and Mr. Allahyar Khan Tareen Advocate High Court, Haripur to file, appear, plead, act, compromise, withdraw or refer to arbitration for me as my Counsel in the above noted matter, without any liability for his default and with the authority to engage/ appoint any other Advocate/ Counsel at my/our matter.

CLIENT
(Noman Javed) 

Accepted and Attested


Ahmad Sultan Tareen ~~Mudassir Ali~~
Advocate High Court


Shafiq Khan
Advocate High Court


Mudassir Ali
Advocate High Court

~~Shafiq Khan~~
Sultan Tareen Law Associates.
TF 338/339, Deans Trade Center, Islamia Road, Peshawar Cantt.
BC No. 10-1583
CNIC: 13302-0450955-5
Cell# 0333-9434837