


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

2166/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	28/10/2024	<p>The appeal of Mr. Aziz ur Rehman presented today by Mr. Niaz ur Rehman Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 01.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

The appeal of Mr. Aziz ur Rehman received today i.e on 28.10.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent nos. 2, 3, and 6 to 9 are unnecessary/improper parties, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondents.
- 2- Memorandum of appeal has not been signed by the appellant.
- 3- Affidavit is not attested by the Oath Commissioner.
- 4- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal be placed on it.
- 5- In the memo of appeal the word petitioner is used but there is no provision in Khyber Pakhtunkhwa Service Tribunal Act/rule 1974 for using the word of petitioner in the memo of appeal.

No. 482 /Inst./2024/KPST,

Dt. 28/10 /2024.

Amjad Ali
ADDITIONAL REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Niaz ur Rehman Adv.
High Court at Karak.

- Sir,
- > objection no 1 removed.
 - > objection no 2 removed.
 - > Oath Commissioner ^{has} already attested. so objection no 3 removed.
 - > objection no 4
copies of
The Enquiry Report, charge sheet,
statement of allegation, show cause
Notice copies were not provided
By the concerned authority. while all
the proceeding were conducted *ex parte*.
 - > objection no 5 removed. Appellant through
Memo 28/10/2024

ADVOCATE REGISTRATION FORM

Name Niaz ur Rehman Khattak
BC No# BC-12-3612
CNIC 14203-2063195-1
Contact 03469779319 /03329736779
Email dpo_nowshera@yahoo.com
Address Tehsil court Takht-e-Nasrati District Karak Khyber
Pakhtoonkhwa.

Advocate.

Mohini

28/10/2024

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR

Service Appeal No 2166 /2024

Aziz ur Rehman S/O Muhammad Aslam Khan (Ex-FC No.193)

r/o Takht-e-Nasrati District Karak.Appellant

Versus

Inspector General Of Police Khyber Pakhtunkhwa, Peshawar

And Others.Respondents

I N D E X

S.NO	Description of Documents	Annex	Pages
1	Service Appeal with Verification/Certificate		1-11
2	Affidavit		12
3	Address of the Parties		13
4	Copy of Enlisted Order and Better Copy	A	14-15
5	Copy of Application and Medical Certificate To DPO Hangu	B	16-17
6	Copy of Application and Medical Certificate To DPO Hangu	C	18-20
7	Copy of impugned Order 26/01/2023	D	21
8	Copy of Appeal and Order 26/09/2023	E	22-25
9	Copy of Revisions and Order 09/10/2024	F	26-28
10	Copy of Bank Statement	G	29-30
11	Copy of OPD and Medical leave certificate	H	31-51
12	Copy of Medical Fitness Certificate	I	52
13	Copy of Notices and Dispatched recite		53-58
14	Wakalatnama		59


Appellant

Through 

Niaz ur Rehman Khattak

Advocate High Court

Tehsil Court Takth-e-Nasrati

District Karak

0346977919/03329736779

Date: 29 / 10 / 2024

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No 2166 /2024

**Aziz ur Rehman S/O Muhammad Aslam Khan (Ex-FC
No.193) r/o TaKht-e-Nasrati District Karak.**

..... Appellant

Versus

- 1. Inspector General Of Police Khyber Pakhtunkhwa,
Peshawar.**
- 2. Regional Police Officer Kohat Region.**
- 3. District Police Officer Hangu District Hangu.**

_____ Respondents

Appeal U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the Order Dated 09.10.2024 Passed by Additional Inspector General of Police HQrs:Khyber Pakhtunkhwa, Peshawar , Wide Which Revision Petition of the Appellant under Rule 11-A of Khyber PakhtoonKhwa Police Rule 1975(Amended 2014) was rejected , And as well as against the Order of Regional Police Officer Kohat Region wide which Departmental Appeal of Appellant was

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No _____ /2024

Aziz ur Rehman S/O Muhammad Aslam Khan (Ex-FC No.193)
 r/o TaKht-e-Nasrati District Karak.

..... **Appellant**

Versus

1. Inspector General Of Police Khyber Pakhtunkhwa,
Peshawar.
2. Additional Inspector General of Police HQrs:Khyber
Pakhtunkhwa, Peshawar.
3. DIG Kohat Division Kohat.
4. Regional Police Officer Kohat Region.
5. District Police Officer Hangu District Hangu.
6. Commandant Police Training Centre (PTC) District Hangu.
7. DSP Headquarter Hangu District Hangu.
8. District Account Officer Hangu District Hangu.
9. National Bank of Pakistan Hangu Branch No.420 District
Hangu.

..... **Respondents**

Appeal U/S 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 against the Order Dated 09.10.2024 Passed by Additional Inspector General of Police HQrs:Khyber Pakhtunkhwa, Peshawar , Wide Which Revision Petition of the Appellant under Rule 11-A of Khyber PakhtoonKhwa Police Rule 1975(Amended 2014) was rejected , And as well as against the Order of Regional Police Officer Kohat Region wide which Departmental Appeal of Appellant was

3

rejected on 26/09/2023 and as well as against the order of District Police Officer Hangu dated 26/01/2023 vide which the appellant was Dismissed from service.

Prayer in Appeal:

On Accepting of the instant Appeal, The Impugned Orders Dated 09.10.2024 of Additional Inspector General of Police HQrs; Khyber Pakhtunkhwa, and Order of Regional Police Officer Kohat Region Dated 26/09/2023 and order of District Police Officer Hangu Dated 26/01/2023 May Kindly be set aside being void ab-initio, illegal and with out any legal justification and the appellant may kindly be Graciously Reinstated with all back benefits. **OR any other relief deems proper & just in the circumstances of the case.**

Respectfully Sheweth:

Brief Facts:

1. That the appellant has joined the police Department in the year 1995 as constable BPS-5 and was performing the duties to the entire satisfaction of his superiors and no complaint whatsoever had been pending against the appellant since joining in the police Department. (Copy of joining Order dated 10/04/1995 and better copy as attached as Annexure A).
2. That on 03/12/2021 appellant was ill severely and consulted with Doctor in this respect and suffering regularly from chronic disease and the meanwhile appellant was detailed for undergoing rigorous/Ethic Training at PTC Hangu, despite

4

ailing health *Appellant* joined the training as per direction of high ups since 1st March 2022 and this regard appellant informed through application duly supported medical certificated to DPO Hangu. (Copy of application and Medical Certificate are attached annexure B).

3. That during the course of Training the ailing health did not allow *Appellant* to complete the training program due to suffering severe Pain in legs and back and the meanwhile on the occasion of Eid ul Fitar the training has been suspended since 29/04/2022 to 05/05/2024.

4. That on 30/04/2022 the appellant visited to District Headquarter Teaching Hospital Kohat through OPD No. 13848 dated 30/04/2022 after examination thoroughly by the Doctor, the appellant was suffering from chronic disease "Hi, Sciatica" and advise Bed/Home rest for a period of 4 weeks w.e.f from 30/04/2022 to 31/05/2022 by the Doctor ,thus Appellant submitted an application with medical Certificate for medical leave To District Police officer, Hangu on 06/05/2022 which was allowed as per Doctor advise.(Copy of applications with Medical Certificate are attached As annexure C).

5. That during the course of training as the appellant suffering from chronic disease and was examining regularly by concerned Doctor and appellant was on bed rest as per advice of Doctor. While the appellant regularly submitted the medical certificate with application to concerned authority for medical leave as per advise of Doctor while surprisingly the Commandant of PTC marked appellant absent from training on 16/08/2022.

6. That after the District Police Officer appointed DSP headquarter as enquiry Officer to conduct departmental enquiry against appellant and The Enquiry officer without summon the appellant conducted Ex-parte Proceeding and enquiry and recommended appellant for major penalty and thus District Police officer awarded major punishment to appellant and Dismissed form service vide OB No. 60 dated 26/01/2023. (Copy of Order is attached as annexure D).

7. That the Appellant challenged the Order OB No. 60 dated 26/01/2023 of District Police Officer Hangu through Departmental appeal Before Regional Police Officer/DIG Kohat and appeal of the Appellant was rejected on 26/09/2023 by Regional Police Officer Kohat.(Copy of appeal and order is attached annexure E)

8. That the Appellant feeling aggrieved from the order dated 26/09/2023 of The Regional Police Officer Kohat and from the order dated 26/01/2023 of The District Police Officer Hangu challenged the said orders before Inspector General of Police Khyber Pakhtunkhwa Peshawar Through Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule 1975(Amended 2014) which was also rejected through order No. 2670-75/24 by the Additional Inspector General of Police HQrs: Khyber Pakhtunkhwa, Peshawar on 09/10/2023.(Copy of Revision and order 09/10/2024 is attached as annexure F)

9. That the Appellant being aggrieved from The impugned Order No.2670-75 dated 09/10/2024 of the Additional Inspector General of Police HQrs: of Khyber Pakhtunkhwa Peshawar, and From Impugned Order dated 26/09/2023 of the Regional Police Officer Kohat and from Impugned order dated 26/01/2023 of the District Police Officer District Hangu ,hence the appellant is assailing the same Orders before ,this honorable Tribunal inter alia on the following amongst other grounds.

GROUND:

A. That the impugned Orders are illegal are arbitrary in nature, against the rules and law, hence need to be struck down.

B. That the medical leave was considered by the concern authority, so why appellant was regularly drawing his salaries since 31st December 2022 through account No. 4015291308 with IBAN No. PK89NBPA0420004015291308 from National Bank of Pakistan Hangu Branch No. 420. But surprisingly the appellant was considering absent from his service. While on 31/01/2026 DPO issued letter to the concern bank for blacking of appellant account.(Copy of Bank Statement is attached is annexure G)

C. That the Respondent while passing the impugned orders has ignored the real facts and appellant was not provide any opportunity of personal hearing/cross examination nor he was properly charge sheeted and statements of allegation was also not given to the appellant, thus the

impugned orders passed in so hurry which are not sustainable in eye of law.

D. That the orders of lower and appellate authorities have been passed against the law and facts on the record. Major Penalty of dismissal from service was imposed on appellant but no regular and proper enquiry was conducted. Appellant was never associated in the enquiry proceedings and was not confronted with any evidence supporting the charge.

E. That all the proceeding of enquiry was conducted in the absence of appellant, no charge sheet or Notice or show cause notice has never been issued to the appellant by the Enquiry officer for joining the Enquiry proceeding as the appellant was severally ill, but this aspect has not been taken in to consideration by the Enquiry officer nor any factum of illness has discussed from relevant quarters concern. As it is an established fact that when the circumstance are beyond the control of human being any order shall be consider null and void.(Copy of application , OPD and medical leave certificates are attached annexure H.).

F. That on 26/07/2023 appellant was finally examined by the Doctor and found fit for service and provide Medical fitness certificate while this fact also ignore by the concerned authorities which not according to law need to be interfered by this Honble Tribunal.(Copy of Medical Fitness Certificate is attached as I)

8

G. That as provide that appellant has served the police department for 28 year and enquiry officer even no departmental official visited the house of the appellant nor recorded any statement of disinterested witness to dig out the material fact regarding the ailment of appellant and ex-partly recommended for major penalty and the DPO Hungu blindly issued the impugned order dated 26/01/2023, without checking medical leave record , which is not warranted in the eye of law.

H. That entire proceeding was carried out at the back of appellant, No one was examined in presence of appellant and the impugned orders have been based on defective enquiry proceeding, therefore the impugned Orders are worth set-aside.

I. That harsh penalty of dismissal from service was awarded to appellant without probing and scrutinizing the charge and conduct of the appellant respectively. The impugned Orders were based on no evidence and the authorities did not take into account the long service and ailing health of petitioner. The alleged absence of appellant was neither willful nor deliberated but inevitable.

J. That the cogent and solid defense of illness of appellant was neither considered nor probes into, while appellant was regularly submitting the medical certificates, prescription to their high ups but the authorities deliberately avoiding to bring these facts on record.

- K. That the impugned order of District Police officer District Hungu based on ex-parte proceeding and enquiry are not sustainable in the eye of law and the authorities have ignored material evidence which is not according to law, need to be interfered by this Honorable tribunal may kindly be set aside.
- L. That the appellant served 28 years long service without complaint and no one can put at stake in the way of major penalty on the base unproved charge of absence from duty and as well as on ex-parte proceeding and Enquiry, which is too harsh, and unreasonable. Therefore the charge is groundless and penalty of dismissal from service amount to punishing the entire member of the family of appellant.
- M. That the appellant was dealt departmentally strictly and service of appellant was dismissed upon the ex-parte enquiry report while no proper departmental enquiry have ever been conducted and not provided opportunity of personal hearing nor provided opportunity of defense nor had tender opportunity of cross examination and without any lawful justification blessed with the impugned orders.
- N. That as per the constitution fair trial and fair enquiry is the basic right of any employee which provides police rules too.

*Melan**Am*

O. That while awarding the impugned major punishment the enquiry report has not been given to appellant which is very much necessary as per PLC 1991, 706 and 584. The appellant dragged unnecessarily into litigation which clearly mentioned in SCMR 2008 page 725.

P. That the appellant tender always a good service before the entire satisfaction of the superiors and never ever indulged in any subversive activity which are against to the norms of service rules the allegation so recorded in impugned orders of punishment ,are without keeping the good service record of the appellant.

Q. That all the Departmental proceeding conducting against the appellant were not thoroughly probe and resultantly the material facts , crux and material available on record were not given due deliberation and the services of the appellant were dismissed which is against to the principle of natural justice.

[Handwritten signature]


[Handwritten signature]

R. That the appellant is absolutely innocent and was suffering form chronic disease and he has been punished for no fault on his part and the punishment being not in accordance of principles of justice , which deserve to be set aside.


11

S. That any other ground will be raised at the time of arguments with the prior permission of this hon'ble Tribunal.

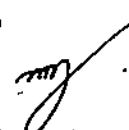
Therefore it is humbly submitted that On Accepting of the instant Appeal, The Impugned Orders Dated 09.10.2024 of Additional Inspector General of Police HQrs; Khyber Pakhtunkhwa, and Order of Regional Police Officer Kohat Region Dated 26/09/2023 and order of District Police Officer Hangu Dated 26/01/2023 May Kindly be set aside being void ab-initio, illegal and with out any legal justification and the appellant may kindly be Graciously Reinstated with all back benefits. OR any other relief deems proper & just in the circumstances of the case.

Appellant 
Through
Niaz ur Rehman Khattak
Advocate High Court


VERIFICATION/CERTIFICATE:

 It is to certify that no appeal has been submitted earlier on the subject matter above to the instant appeal before this Honorable Tribunal.

List of Books:

- "  25/10/2024
ATLANTIC
LINEZ
DEPONENT
- i. Khyber Pakhtoon Khwa Service Tribunal Act 1974-KP Cod
 - ii. Khyber Pakhtoon Khwa Police Rule 1975(amendment 2014)
 - iii. Police Rule 1934.
 - iv. Constitution of Pakistan
 - v. Any other law books as per need.

Dated: 28/10/2024


Advocate,

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR**

Service Appeal No _____ /2024

Aziz ur Rehman S/O Muhammad Aslam Khan (Ex-FC No.193)
r/o Takht-e-Nasrati District Karak.Appellant

Versus

Inspector General Of Police Khyber Pakhtunkhwa, Peshawar
And Others.Respondents


AFFIDAVIT


I Aziz ur Rehman S/O Muhammad Aslam Khan R/O Takht-e-Nasrati District Karak do hereby solemnly affirm & declare on oath that contents of the accompanying Appeal are true & correct to the best of my knowledge and nothing has been kept concealed from this honorable court.


DEPONENT

(Aziz ur Rehman)

Identified by :


Niaz ur Rehman Khattak
Advocate Peshawar High court
Tehsil Court Takht-e-Nasrati.
03469779319/03329736779


Date **28/10/2024**

Dated: 28/10/2024

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No _____ /2024

Aziz ur Rehman S/O Muhammad Aslam Khan (Ex-FC No.193)
r/o Takht-e-Nasrati District Karak.Appellant.

Versus

Inspector General Of Police Khyber Pakhtunkhwa, Peshawar
And Others.Respondents

ADDRESSES OF THE PARTIES

Appellant

Aziz ur Rehman S/O Muhammad Aslam Khan (Ex-FC No.193)
r/o Takht-e-Nasrati District Karak.

Respondents

1. Inspector General Of Police Khyber Pakhtunkhwa,
Peshawar.
2. Regional Police Officer Kohat Region.
3. District Police Officer Hangu District Hangu.

Appellant

Through

Niaz ur Rehman Khattak
Advocate High Court
Tehsil Court Takht-e-Nasrati
District Karak
0346977919/03329736779

Date: / /2024

14
Annex A

WARRANT ORDER.

Candidate Mr. Aziz ur Rehman

S/o Muhammad Aslam resident of Vill: Takht Nabhath

Police Station Takht Nabhath Teh: Kasur Distt: Kasur

enlisted as Constable in BPS o.5 i.e (Rs. 1400-65-2397) w.e. from

10.4.88 and allotted Constabulary o. 2365.

He is enlisted merely on temporary basis and his service would be liable to terminate any time without any notice under Police Rules 12.21.

Def: in height by 1
& chest by 2
Condemned by 90 P.M.V.P

Height 5-6 Chest 31x34

Age 24.7M Education 10th

Dt of Birth 3.4.72

CB No. 252
Dated 10.4.88

COMMISSIONER
SERVING RESERVE POLICE OFFICER,
KASUR DISTRICT

ATTESTED
Date 28/07/2024
S No. 1

Roller copy (A.S.)

ENLISTED ORDER

Candidate Mr. Aziz ur Rehman S/O. Muhammad Aslam Khan resident of vill: Takht-e-Nasrati Police station Takht-e-Nasrati Tehsil Karak District Karak enlisted as constable in BPS-5. i.e (Rs/ 1400-66-2390) w.f. From 10/04/1995 and allotted constabulary No. 2365.

He is enlisted merely on temporary basis and his service, would be liable in terminate any time without any notice under Police Rules 12.21.

Height 5-6 chest 31x34

22year .7 Month. Education ...10th

Date of birth 30/04/1972

OB.No. 252

Dated: 10/04/1995

Attest
ATTESTED
Date: 28/04/2005
No. 2

Commandant:
Frontier Reserve Police NWFP
Peshawar

Assistant Professor

Dr. Siraj-Ud-Din

M.B.B.S, M.C.P.S, F.C.P.S(Medicine)

Consultant Physician

Medical "A" Ward)

DHQ Teaching Hospital KDA Kohat
KIMS Kohat

PMDC # 13847-N
Not Valid Medico
Legal Purpose

اسٹنٹ پروفیسر
ڈاکٹر سراج الدین

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس (میڈیسن)
ماہر امراض: معدہ، جگر، شوگر، بلڈ پریشر، سینہ، فالج، ہیپاٹائٹس بی، سی، بخار
انچارج ہیپاٹائٹس کنٹرول پروگرام ڈی ایچ کیو کوہاٹ
میڈیکل A دارڈ HQ DHQ ہسپتال KDA کوہاٹ

Pt's Name Mrs. Laila Afridi Age 30 Sex F Date 03-12-21

S. Lids / Lactating
Clinical Record

Rx

Tender Cervical
lymph. Nodes.
Dry mouth 10 days.
GPA.
B.P: 90/70
Pulse: 114/min
O₂: 97%
Temp: 100.5 F
CBC 7500/c
10.8 grade
ESR - 8 mm / 1st hr
RBC - 70 ugrade
M.P @

Lab. Argonento-BD
2000 1-1-12
Ino. Acenac 100
2000 1-1-12
Cap. Esmo 40
114
Lab. Vitrum
2000 1-1-12

Attested
Notar
ATED
2014 2014
S.No

اوقات کار:
جمعہ: 3 تا 6 بجے شام
اتوار: صبح 9 تا 1 بجے دن

دوبارہ معائنہ کیلئے..... بعد تشریف لائیں۔
نمبر حاصل کرنے کیلئے رابطہ کریں: 0333-8086224

کلینک: کینٹ پلازہ بالمقابل میونسپل کمیٹی ہنگو روڈ کوہاٹ

14253-6856123
1992
2022
2542853

ATTESTED
Date: 28/12/22
S.No. 6

Attested
M. S. S.

Handwritten notes in Urdu script, including the word 'Attested' and some illegible text.

Handwritten notes in Urdu script, including the number '2'.

Handwritten notes in Urdu script, including the number '11', a signature, and the date '30/12/2022'. There is also a stamp that says 'ATTESTED' and 'Date: 30/12/22'.

18/11/22

19

Medical No. 2

Rs. 10/-

No.

OUT-PATIENTS DEPARTMENT

NAME

Amir u Rehman

YEARLY NO.

18, 19

DATE

13848 - 30-4-22

No.

Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE

DISEASE

Hx of

Back Pain

*Ad Wine
RE
B Sugar.*

by white Vm

by Framal + Gravimol Vm

Tab Befain 75mg

Tab Cobal mine

Tab Famot 20mg

Advise Rest 2 weeks

Attested

Mehar

ATTESTED

Date: *20/4/2022*

S.No: *6*

Medical Officer
BHQ/Hospital Kohat

FACE VALUE RUPEES 10/-

GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient _____

Certified that Mr./Ms. Aziz-ur-Rehman S/D/W/O Muhammad Aslam
resident of _____

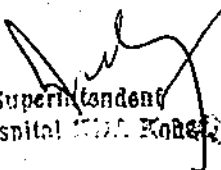
Designation Constable - Department Police

having CNIC No. 16203-685673-1 has been examined in this hospital vide
Emergency / O.P.D / Admission No. 13848-22 dated 30-4-22

He / She is suffering from Acute Stomachic. Colitis

and is advised bed / home rest along with the medications prescribed for a period of 04 weeks
w.e.f. 30-4-22 to 31-5-22 for the restoration of his / her health.

Attested
Shahid
ATTESTED
Date: 28/05/24
S No: 57


Medical Superintendent
DHO Hospital Kohat

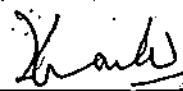
Signature

Name of Doctor

Designation

M.I.&DC No.

Official Seal


Dr. Muhammad Iqbal
SMD-6
Medical Officer
DHO/Hospital Kohat



21
Annex D

OFFICE OF THE
DISTRICT POLICE OFFICER,
HANGU

Tel: 0925-623878 Fax 0925-620135

ORDER

This order is passed on the departmental enquiry against Constable Aziz-ur-Rehman No. 193 under the Khyber Pakhtunkhwa Police Rules 1975 (Amendment 2014).

Brief facts of the case are as under:-

- i. Constable Aziz-ur-Rehman No. 193 while undergoing Rigorous/Ethic Training at PTC Hangu has absented himself from training without any leave or permission vide DD No. 4, dated 06.05.2022 of PTC Hangu and still absented as reported by the Commandant, PTC, Hangu vide his office Signal No. 1275/GC, dated 16.08.2022
- ii. His above act shows indiscipline manner, disinterest and amount to gross misconduct on his part.

He was served with Charge Sheet and statements of allegations under the Khyber Pakhtunkhwa Police Rules 1975 (Amendment 2014) vide this office No. 133/EC, dated 12.10.2022, to which he failed to submit his reply to the DSP, HQrs, Hangu, who was appointed as Enquiry Officer to conduct departmental enquiry against him. After completion of enquiry, the Enquiry Officer submitted his finding report vide No. 1611/DSP/HQ; dated 31.10.2022, in which the defaulter Constable Aziz-ur-Rehman No. 193 was time & again summoned for giving full opportunity of hearing, but he failed to appear before the enquiry officer and still absented thus, held him guilty for the charges leveled against him and recommended to be awarded him a major punishment.

Also, the defaulter Constable Aziz-ur-Rehman No. 193 was called in orderly room on 03.11.2022, but he did not appear before the undersigned. Consequently, a Final Show Cause Notice was issued to him this office vide No. 277/EC, dated 03.11.2022, but he also failed to submit his reply. Subsequently, a Notice was advertised in daily newspaper regarding issuing of Last Notice to him for appearing/making his arrival report at Police Lines Hangu within 07 days positively, but no response could be received from his side so far.

Keeping in view of above and having gone through available record, the undersigned has arrived at the conclusion that defaulter Constable Aziz-ur-Rehman No. 193 did not make his arrival report at Police Lines, Hangu up-till now, which indicates that he is not more interested to serve the Police Department. Moreover, in these circumstances, his retention in Police Department is burden on public exchequer, therefore, I, Asif Bahader, (PSP), District Police Officer, Hangu in exercise of the powers conferred upon me under the Rules 114(d), dispense with general proceedings and awarded him a major punishment of Dismissal from Service with immediate effect.

Order Announced.

OB No. 80

Dated 17/11/2023

Attested
Signature
ATTESTED
Date: 28/10/2024
S.No. 8
DISTRICT POLICE OFFICER,
HANGU

OFFICE OF THE DISTRICT POLICE OFFICER, HANGU.

No. 559-62 EC, dated Hangu, the 28/10/2023
Copy of above is submitted to the Regional Police Officer, Kohat Region, Kohat for
favour of information, please.

2. Pay Officer, EC, Reader & OHC for necessary action.

DISTRICT POLICE OFFICER,
HANGU

Annex-2 22

ORDER.

This order will dispose of the departmental appeal preferred by Ex-Constable Aziz ur Rehman No. 193 of district Hangu against the order of District Police Officer, Hangu whereby he was awarded major penalty of dismissal from service vide OB No. 60 dated 26.01.2023. Brief facts of the case are that he while undergoing rigorous ethical training at PTC Hangu, absented himself from training without any leave or prior permission vide DD No. 40, dated 06.05.2022, PTC Hangu and remained absent till the date of his dismissal i.e. 26.01.2023. His total absence comes to about 07 months and 25 days.

Proper departmental enquiry proceedings were initiated against him and DSP / HQrs: Hangu was nominated as Enquiry Officer. The Enquiry Officer after fulfillment of codal formalities submitted his findings wherein the appellant was found guilty of the charges leveled against him. He was, therefore, recommended for penalty under the relevant rules.

Keeping in view the recommendations of the Enquiry Officer and the above cited circumstances, the delinquent official was awarded major punishment of dismissal from service under the relevant rules by the District Police Officer, Hangu vide OB No. 60 dated 26.01.2023.

Feeling aggrieved from the order of District Police Officer, Hangu, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in the office of the undersigned on 26.09.2023. During personal hearing the appellant did not advance any plausible explanation in his defense.

Foregoing in view, I, Sher Akbar, PSP, S.St, Regional Police Officer, Kohat, being the appellate authority, am of the considered opinion that the charges leveled against him have been established beyond any shadow of doubt. He has rendered himself unfit for retention in a disciplined force. Hence, appeal of Ex-Constable Aziz ur Rehman No. 193 is hereby rejected, being without substance.

Order Announced
26.09.2023

Attested
Mehar
ATTESTED
Date: 28/09/24
S No: 9

Regional Police Officer,
Kohat Region

No. 1053/EC, Dated Kohat the 03.10.2023

Copy forwarded to District Police Officer, Hangu for information and necessary w/c to his office Memo: No. 537/LB, dated 11.09.2023. His Service Record is returned herewith.

2. Appellant Ex-Constable Aziz-ur-Rehman No. 193 of district Hangu

BEFORE THE DEPUTY GENERAL OF POLICE KOHAT REGION KOHAT.

SUBJECT: APPEAL AGAINST THE IMPUGNED ORDER OF DPO HANGU VIDE OB NO 60 DATED 30-01-23 IN WHICH UPON THE ALLEGATION THE APPELLANT HAS ABSENTED HIMSELF FROM TRAINING WITHOUT ANY LEAVE OR PERMISSION AND UPON THE ABOVE SCORE ALLEGATION THE APPELLANT WAS AWARDED MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITH IMMEDIATE EFFECT.

Respectfully Sheweth,

With great veneration the instant appeal is preferred by the appellant on the following grounds:

Briefly facts of the case are that as per impugned order the appellant constable while under going rigorous /Ethic Training at PTC Hangu has absented himself from training without any leave or permission vide DD No-4 dated 08-05-2022 of PTC Hangu. (Copy of impugned order is annexed as annexure A)

1. That the appellant tender always a good service before the entire satisfaction of the superiors and never ever indulged in any subversive activity which are against to the norms of service rules" the allegation so recorded in impugned order are baseless having no legal footing and directly issued with the impugned order of major punishment and without keeping the good service record of the appellant.

2. That the appellant has served 28 years service in the department without any complaint which could be verified from the service record of the appellant.

3. That No charge sheet or any show cause notice has ever been issued to the appellant as the appellant was severally ill and was unable to appear before for any type of disciplinary proceedings even was unable to talk but the aspect has not been taken into consideration by the enquiry officer nor any factum of illness has been discussed from relevant quarters concerned. Copy of all medical record is annexed as annexure B).

4. That all the proceeding of enquiry was conducted in the presence of the appellant as it is a established fact that when the circumstances are beyond the control of human being any order shall be consider null and void.

5. That provide that appellant has served the department for 28 years and enquiry officer even he department official with the notice of the appellant.

*Was read
Shahid
Date 28/1/23*

dig out the material fact regarding the ailment of appellant and expertly issued the impugned order which is not warranted by law.

GROUNDS

- A. That the appellant was dealt departmentally strictly and service of the appellant was dismissed upon the enquiry finding report of the enquiry officer so appointed and no proper departmental enquiry ever been conducted.
- B. That appellant was on dead bed ill all the proceeding were conducted in the absence of the appellant which is apparent from the impugned order
- C. That there is a admitted fact mentioned in impugned order that the appellant submit the reply to the show cause notice and ex-part proceeding were conducted against the appellant.
- D. That no proper departmental enquiry have ever been conducted against the appellant and not provided opportunity of personal hearing nor provided opportunity of defense nor had tender opportunity of cross examination and without any lawful justification blessed with the impugned order.
- E. That as per the constitution fair trial and fair enquiry is the right of any employee and as per police rules.

F. That the appellant was neither provided an opportunity to cross examine the witnesses nor to produce defense evidence and the enquiry proceeding is grossly defective. Furthermore the requirements of rules regarding enquiry have not been observed while awarding the impugned punishment.

G. That the appellant dragged unnecessarily into litigation which is clearly mentioned in 2008 SCMR 725.

H. That while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per 1991 PLC CS 706 & PLC 1991 584.

I. That all the Departmental proceeding conducting against the appellant were not thoroughly probe and resultantly the material facts and crux and material available on record were not given due deliberation and the services of the appellant were dismissed which is against to the principle of natural justice.

J. That the appellant is absolutely innocent and he has been punished for no fault on his part.

K. That the punishment being not in accordance with last and the principles of justice deserves to be set aside.

L. That if deemed proper, the appellant may kindly be heard in person.

Alfred
Ward
20/11/11
D
LIT
Date
& No

JS

In the view of above circumstances-it is humbly prayed that the impugned order of DPO, Hangu date 30.01.2023 may please be set aside for the end of justice and the appellant may please be graciously reinstated in the service with all back benefit or blessed with any other remedy as deemed appropriate.

Date: 26/7/2023

*Attested
Mehar*

(Appellant)

Aziz ur Rehman

Aziz ur Rehman

Ex-Const of PTC Hangu No.193

Mehar

ATTESTED
Date: 28/7/2023
S. Neeraj Kumar

(Signature)

To,

The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Subject: REVISION OF PETITION UNDER RULE 11.A OF POLICE RULES, 1975.

Respected Sir,

With profound regards, petitioner submits instant petition against the order of District Police Officer Hangu bearing OB No.60 dated 30-01-2023 vide which petitioner was dismissed from service and order of Regional Police Officer Kohat, Region Kohat dated 03-10-2023 vide which the departmental appeal of petitioner was rejected.

FACTS:-

1. That the petitioner was serving district Hangu Police as constable and long service of 28 years was at the credit of petitioner. In the year 2022, petitioner was suffering from chronic disease and in the meanwhile petitioner was detailed for in-service training at Police Training College Hangu. However, despite ailing health petitioner joined the training.

*Attested
Relief*

ATTESTED
Date: 28/10/2023
S.No. 13

That the ailing health did not allow petitioner to attend full program of the training. Therefore the training authorities marked petitioner absent from training. District Police Officer Hangu initiated ex-parte departmental proceeding against petitioner which culminated in passing the impugned order of dismissal from service and the departmental appeal of petitioner was also rejected by appellat authority, hence this Revision petition on the following grounds.

GROUND:


- a) That the orders of lower and appellate authorities have been passed against the law and facts on the record. Major penalty of dismissal from service was imposed on petitioner but no regular and proper enquiry was conducted. Petitioner was never associated in the enquiry proceedings. Petitioner was not confronted with any evidence supporting the charge. No witness was examined in presence of petitioner. The entire proceedings were carried out at the back of petitioner. The impugned orders have been based on defective enquiry proceedings, therefore the order are worth set-aside.
- b) That harsh penalty of dismissal from service was awarded to petitioner without probing and scrutinizing the charge and conduct of petitioner respectively. The impugned order was based on no evidence and the authorities did not take into account the long service and ailing health of petitioner. The alleged absence of petitioner was neither willful nor deliberated but inevitable.


- c) That the cogent and solid defense of illness of petitioner was neither considered nor probes into. The defense of petitioner was strong, therefore the authorities avoided to bring it on record. The impugned order based on ex-parte proceeding are not sustainable because the authorities have ignored material evidence.
- d) That none can put at stake 28 years long service on un-proved charge of absence from duty. Therefore the charge is groundless and penalty of dismissal from service amounts to punishing the entire members of the family of petitioner. Petitioner also wishes to be heard in person for advancing additional grounds.

Enclosures

Copies of impugned orders.

Your's obediently,


Aziz-Ur-Rehman,
Ex-constable No.193-
District Hangu.
0332-9542253


ATTESTED
Date: 28/07/2024
S No. 24



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

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-FC AZIZ ULLAH Rehman~~ No. 193. The applicant was dismissed from service by DPO Hangu vide OIB No. 60, dated 26-01-2023 on the allegation that he while undergoing Rigorous/Ethic Training at PTC Hangu has absented himself from training without any leave or permission vide DD No. 40 dated 06.05.2022 of PTC Hangu and still absented as reported by the Commandant PTC Hangu vide his office Signal No. 1275/GC, dated 16-08-2022.

The Appellate Authority i.e. RPO Kohat rejected his appeal vide order Indst: No. 10520/EC, dated 26/09/2023.

Meeting of Appellate Board was held on 26.09.2024 wherein petitioner was heard in person. The petitioner contended that the absence was not deliberate and that he was suffering from chronic disease.

The petitioner was heard in person. He was given reasonable opportunity to defend himself against the charges; however he failed to advance any justification. The Board sees no ground and reasons for acceptance of his petition, therefore, his petition is hereby ~~rejected~~.

Sd/-

AWAL KHAN, PSP

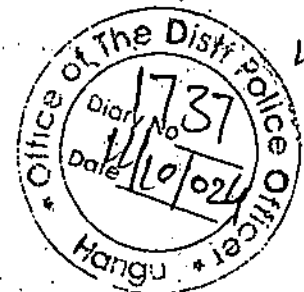
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. SI 2670-75/24, dated Peshawar, the 09-10-2024.

Copy of the above is forwarded to the:

Regional Police Officer, Kohat Service Record and Fauji Missal of the above named Ex-FC received vide your office Memo: No. 12141/EC, dated 17.11.2023 is returned herewith for your office record.

1. District Police Officer, Hangu.
2. District Police Officer, Hangu.
3. AIG/Establishment, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.



15/10/24

DPO/Hangu

Per mtr & n.d along with service record

[Signature]
(SONIA SHAMROZ KHAN)
PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

SRC/Off

Regional Police Officer,
Kohat Region Kohat

For info and link with record.

No. 8509/EC
Dt. 11-10-2024

[Signature]
DISTRICT POLICE

[Signature]
DISTRICT POLICE
OFFICER HANGU

Amir G 29

National Bank of Pakistan

Account Statement

Account Title(s) AZIZ UR REHMAN

Address: MOHALLAH MIR GUL KHEL TAKHT E
NASRATI

Postal Code:

Branch Code/Name: 420 Hangu Branch

Region Name: Dera Ismail Khan

Statement Printing Date: 25-Oct-2024

User: 00014598

Branch: 2185

Terminal: PKPWVVBANNU02

Town:

District:

City: KARAK

Province/State: KH.PAKHTOON

Country: PAKISTAN

Product Name: PKR Current Account

Currency: PKR

CIF No: 1288472

Account No: 4015291308

IBAN: PK89NBPA0420004015291308

B/F Balance: 0.00

From: 01-Jun-2022

To: 25-Oct-2024

S. No.	Date	Particulars	Instno	Memo	Debit	Credit	Balance
1	03-Jan-2023	SALARY		03	0.00	55,652.00	56,628.00
2	05-Jan-2023	CASH WITHDRAWAL	1884040		56,000.00	0.00	628.00
3	01-Feb-2023	SALARY		01	0.00	55,652.00	56,280.00

Total 2 Credit transactions of amount: 111,304.00

Total 1 Debit transactions of amount: 56,000.00

Attested
Mirza
ATTESTED
Date: 28/10/2024
S.No: 35

Demand Deposit Account (40152913085 C1288472 Type: 4555 C/A)

Permanent Holds

Seq	Start Date	Exp Date	Amount	Comment
1	31/01/2023		10000000.00	DPO Letter 31-01-2023

30

Handwritten: ATR
Date: 31/01/2023
S.R. No. 10000000.00
DPO Letter 31-01-2023

31/05/2022

~~Handwritten text, possibly a signature or name, crossed out with a line.~~

Handwritten text, possibly a date or reference number.

Handwritten text, possibly a title or subject line.

Handwritten text, possibly a list or detailed notes.

Handwritten text, possibly a signature or name.

Handwritten text, possibly a date or reference number.

Medical No. 2

Rs. 10/-

No.

OUT-PATIENTS DEPARTMENT

NAME

A. B. 3 - Mr. Sharma

YEARLY NO.

1111

DATE

24.5.22 14568

No.

Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE

DISEASE

FACE VALUE RUPEES 10/ FACE VALUE RUPEES 10/-

LB Paw

*1/1v Carbu
Ringer's Lact
by Trained
by Grant
by Acock 40.
by route 1/1.*

Attested
DATE: *22/10/2022*
S.No. *68*

Tab Nebivol foot

Tab Thiolax

Cap Rizik

Advise Rest & walk

Medical Officer
[Signature]
BHO/Hospital Kohat

**GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT**

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient _____

Certified that Mr./Ms. Aziz u. Rehman B.D./W/O Mrs. Ahsan Ma

resident of _____

Designation Constable Department Police

having CNIC No. 14203-6856573-1 has been examined in this hospital vide

Emergency / O.P.D / Admission No. 14568-22 dated 29-5-22

He / She is suffering from Low Back Pain

and is advised bed / home rest along with the medications prescribed for a period of one month
w.e.f. 28-5-22 to 30-6-22 for the restoration of his / her health.

M. Khan
28/5/22
28/5/22
28/5/22
Medical Superintendent
DHQ Hospital EDA Kohat

Signature

Name of Doctor

Designation

EM&DC No.

Official Seal

[Signature]
Dr. Haid Khan
M.D.
Medical Officer
DHQ Hospital Kohat

1-2652522-2271 14703-2252523-1
4/16/2014

Handwritten notes, possibly a list or schedule, with some numbers and dates.

Handwritten notes, possibly a list or schedule, with some numbers and dates.

Handwritten notes, possibly a list or schedule, with some numbers and dates.

Handwritten notes, possibly a list or schedule, with some numbers and dates.

Handwritten notes, possibly a list or schedule, with some numbers and dates.

Handwritten notes at the bottom of the page, including the number 34.

Medical No. 2

Rs. 10/-

No.

OUT-PATIENTS DEPARTMENT

NAME

Abdul Wahid Khan

YEARLY NO.

1602

DATE

16/02 4/6/22

FACE VALUE RUPEES 10/-

No.

Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE

DISEASE

*ly. Vorn. 1/2
ly. methycobal 1/2m*

LB. Pan

Tab Monagoric

Tab Acimic 100mg

Tab. Nendobron

Adv's Rest 4 weeks

Attested
ATTESTED
Date: *28/10/2022*
S.No. *27*

SK
Medical Officer
DEO/Hospital Kohat

**GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT**

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient _____

Certified that Mr./Ms. Aziz U. Rehman S/D/W/O Mrs. Behar Khan

resident of Takhi Naryati Kanak

Designation Constable Department Police

having CNIC No. 14203-6956573-1 has been examined in this hospital vide

Emergency / O.P.D / Admission No. 1602-22 dated 4-6-22

He / She is suffering from Lt. Sore throat

and is advised bed / home rest along with the medications prescribed for a period of one month

w.e.f. 4-6-22 to 5-7-22 for the restoration of his / her health.

Makhan
ATTENDED
Date: 28/10/2024
S No. 22

Signature _____
Name of Doctor Mr. Zahid
Designation _____
M.I&DC No. _____
Official Seal Medical Officer
DHQ/Hospital Kohat

[Signature]
Medical Superintendent
DHQ: Hospital KDA Kohat

188
14203-68535
0339840953/14203-68535

Handwritten notes in Urdu script, including dates like 27/12/2022 and 28/12/2022.

ATTACHED
DATE 28/12/2022
S.No. 23

Handwritten notes in Urdu script, including dates like 27/12/2022 and 28/12/2022.

Handwritten notes in Urdu script, including dates like 27/12/2022 and 28/12/2022.

Medical No. 2

Rs. 10/-

No.

OUT-PATIENTS DEPARTMENT

NAME OLENIA

YEARLY NO. A212 Rahman

DATE 25/7/22

No.

Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE 1/6/66

DISEASE

- by Museyke
- by Dep-midml son
- Cup Limbo en son
- 300 Tremapau
- 400 Anorek Sun
- 400 Arise - was

Rest - one month

[Signature]

1000/10000
1000/10000

FACE VALUE RUPEES 10/-

ATTESTED
DATE 28/10/2024
S/NO 26

39

GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient _____

Certified that Mr./Ms. Mr. Z. U. Rehman S/D/W/O Mrs. Agha Khan
resident of Karak. 1 Tachik. Narsakhe
Designation Constable Department Police
having CNIC No. 14203-6858273-1 has been examined in this hospital vide
Emergency / O.P.D / Admission No. 16066-22 dated 25-7-22

He / She is suffering from Left Shoulder LMP
and is advised bed / home rest along with the medications prescribed for a period of one month
w.e.f. 25-7-22 to 23-8-22 for the restoration of his / her health.

Handwritten signature
28/10/24
25

Handwritten signature
Medical Superintendent
DHQ Hospital Kohat

Signature _____
Name of Doctor Dr. Fida - m. m.
Designation SRMO
M.I.&DC No. _____
Official Seal Medical Officer
DHQ/Hospital Kohat

625653

Handwritten notes in Urdu script, including the word "Khalifa" and "Khalifa" written vertically.

STAMP: 27/08/2019, 5:16 PM, S.No. 18

Handwritten notes in Urdu script, including the word "Khalifa" and "Khalifa" written vertically.

Handwritten notes in Urdu script, including the word "Khalifa" and "Khalifa" written vertically.

Handwritten notes in Urdu script, including the word "Khalifa" and "Khalifa" written vertically.

(41)

GS&PD, KPK, 150318-F5-40,500 Pairs-17.01.2022/Form Store Jharkhand, 2

Medical No. 2 Rs. 10/-

No. OUT-PATIENTS DEPARTMENT

NAME *Abdul Karim*

YEARLY NO. _____

DATE *12/2/2022*

No. OUT-PATIENTS DEPARTMENT Rs. 10/-

NAME _____

YEARLY NO. *2335*

DATE *5/8/22*

DISEASE *L.P.P.*

FACE VALUE RUPEES 10/ FACE VALUE RUPEES 10/-

R PAKHTUNKHWA HOSPITAL

Uy *Yoon*
W *multy control*

Ins *Nabmal. for -*

Ins *Land Man*

Lup *Pegulu. Sons*

Lup *M. sek. 4 sons*

Admission *2287- (04) four weeks*

Attested
ATTESTED
Date: *28/10/2024*
S.No. *27*

[Signature]
Medical Officer
HQ/Hospital Kohat

42

**GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT**

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient _____

Certified that Mr./Ms. ABDUS - Q - Rehman S/D/W/O Muhammad Akbar
resident of Fakir-e-Arabi Kohat
Designation Constable Department Police
having CNIC No. 14203-6856573-1 has been examined in this hospital vide
Emergency / O.P.D / Admission No. 2335-22 dated 5/8/22

He / She is suffering from Low Back Pain (LBP)
and is advised bed / home rest alongwith the medications prescribed for a period of one month
w.e.f. 5/8/22 to 6-9-22 for the restoration of his / her health.

Signature
Date: 28/08/22
S.No: 28

Signature _____
Name of Doctor Dr. Subhan
Designation MD
M.I&DC No. _____

Signature
Medical Superintendent
DHQ Hospital Kohat

Official Seal

Medical Officer
DHQ Hospital Kohat

44

Medical No. 2

Rs. 10/-

No.

OUT-PATIENTS DEPARTMENT

NAME *Aziz - w. Akbar*

YEARLY NO. *02/22*

DATE *26-9-22* 17.5.31

No.

Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE *10/10*

DISEASE

Im. Venenim

Cap. Zagub. 5m

748 *Medly Card* *807*

748 *Medly Card*

Cap *Risk 400*

Rest - one month

FACE VALUE RUPEES 10/ FACE VALUE RUPEES 10/

ATTESTED
Date *28/10/22*
S.No. *8.D*

[Signature]
Medical Officer
BHQ/Hospital Kohat

43

**GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT**

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient _____

Certified that Mr./Ms. Aziz-ur-Rahman S/D/W/O M. A. Khan
resident of Kohat

Designation Const. Department Police

having CNIC No. 14203 - 6856573 - 1 has been examined in this hospital vide
Emergency / O.P.D / Admission No. 17531 - 22 dated 26-9-22.

He / She is suffering from Left Denture
and is advised bed / home rest alongwith the medications prescribed for a period of 04 weeks
w.e.f. 26-9-22 to 25/10/22 for the restoration of his / her health.

Attested
ATTESTED
Date: 28/9/2022
S.No. 37

[Signature]
Medical Officer,
EM/DHQ Hospital Kohat

Signature: [Signature]
Name of Doctor: Dr. M. Khan
Designation: S.M.O.
M.I.&DC No. _____
Official Seal: Medical Officer, DHQ/Hospital Kohat

1423-6858573-1

~~12/11/2022~~
~~12/11/2022~~

12/11/2022
12/11/2022
12/11/2022

12/11/2022
12/11/2022
12/11/2022

12/11/2022
12/11/2022
12/11/2022

12/11/2022
12/11/2022
12/11/2022

12/11/2022
12/11/2022
12/11/2022

12/11/2022
12/11/2022
12/11/2022

12/11/2022
12/11/2022
12/11/2022

ATTESTED
12/11/2022

47

GSAPD.KPK.1903/0-FS-40,000 Pads-17.01.2022/Form Store Jobs/Med. 2

Medical No: 2 Rs. 10/-

No. OUT-PATIENTS DEPARTMENT

NAME *Asif Ali Khan*

YEARLY NO. *W/11*

DATE: *6646 12/11/22*

No. Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE

DISEASE *Heart failure*

FACE VALUE RUPEES 10/ FACE VALUE RUPEES 10/-

By *Colonel* *12 m.*

Ins. *Subsist* *12*

Ins. *milky* *19*

Admin. Rest. (06) weeks.

ATTESTED
28/11/2022
33



Medical Officer
SHO/Hospital Kichef

GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient _____

Certified that Mr./Ms. Asif - U - Khan S/D/W/O Ms. Arshad Khan
resident of Enkhra - M. S. R. C. - Karak
Designation Constable Department Police
having CNIC No. 4203 - 683 6273 - 1 has been examined in this hospital vide
Emergency / O.P.D / Admission No. 6646 - 22 dated 12 - 11 - 22

He / She is suffering from Left Scatica
and is advised bed / home rest along with the medications prescribed for a period of 06 Six weeks
w.e.f. 22-11-22 to 27-12-22 for the restoration of his / her health.

Attested
ATTESTED
28/10/2024
34

Signature

Name of Doctor

Designation

P.I.&DC No.

Official Seal

[Signature]
Dr. Muhammad Shah
SMO

Medical Officer
DHO/Hospital Kohat

[Signature]
Medical Superintendent
DHO: Hospital KDA Kohat

Handwritten text at the top of the page, possibly a header or date.

Main body of handwritten text, starting with a large flourish.

Continuation of the main body of handwritten text, showing several lines of cursive.

A distinct line of handwritten text, possibly a signature or a specific note.

Handwritten text at the bottom of the page, including a date.

Final line of handwritten text at the very bottom of the page.

50

R PAKHTUNKHWA HOSPITAL

Medical No. 2

Rs. 10/-

No. OUT-PATIENTS DEPARTMENT

NAME *M. J. Khan*

YEARLY NO. *16561*

DATE *27/12/22*

No.

Rs. 10/-

OUT-PATIENTS DEPARTMENT

NAME

YEARLY NO.

DATE

DISEASE *LBP*

FACE VALUE RUPEES 10/-

Dr. V. Khan *X-ray*
L. spine
AP

1st - Normal fm.
1st

2nd - Dycorn
1st

3rd - Pizulin - 5mg
1st

4th - furozida - 40mg
1st

Ref. one month

ATTESTED
28/12/22
S.No. *36*

[Signature]
Medical Officer
DHO Hospital Kohat

51

GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient _____

Certified that Mr./Ms. Mr. A. G. Nohani S/D/W/O Mrs. Ayesha Khan
resident of Tankhela Masrati Kohat
Designation Constable Department Police
having CNIC No. 44243-6856273-1 has been examined in this hospital vide
Emergency / O.P.D / Admission No. 16861- dated 27.12.22

He / She is suffering from Left Spine
and is advised bed / home rest alongwith the medicals as prescribed for a period of one month
w.e.f. 27.12.22 to 26-1-23 for the restoration of his / her health.

ATTESTED
Date: 28/12/22
S.No. 87

[Signature]
Medical Superintendent
DHO Hospital KDA Kohat

Signature [Signature]
Name of Doctor Dr. Waqar Khan
Designation SNCO
M&DC No. _____
Official Seal Medical Officer
DHO/Hospital Kohat

52 Amm J

GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTER HOSPITAL KDA KOHAT

MEDICAL FITNESS CERTIFICATE

Certified that Mr./Ms. Aziz - u - Rehman SID/WIO Muhammad Aslam Khan
resident of Tykhitar NASTATI - Distt - Kohat
having CNIC No. 14203-1 6856573-1 has been examined in this hospital vide
O.P.D No. 34751-23 dated 26-07-2023.

The following investigations were advised:-

- 1. Chest X-Ray ----- NAD
- 2. Eye V.A ----- 6/6
- 3. Urine R/E ----- Un-remarkable
- 4. HBS ----- Negative
- 5. HCV ----- Negative
- 6. HIV ----- Negative

He / She is PHYSICALLY FIT & MENTALLY SOUND for general purposes.

M. Khan
ATTESTED
Date. 30/07/2023
S.No. 38

[Signature]
Medical Officer
DHO Hospital KDA Kohat

بعد الت جہا۔ سروسی ٹریبونل کے کام کا اور



عزیز الرحمن بنام ایف اے اور
2۔ پنجاب ایڈوانس
14203-2063195

موزخہ
مقدمہ
دعویٰ
جرم

سروسی ایپل باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ
آن مقام کے لئے سروسی ٹریبونل کے لئے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یک طرفہ یا ایپل کی برآمدگی اور منسوخ

نیز دائر کرنے ایپل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی کے واسطے اور دیکل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار

ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو دیکل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

المرقوم _____ ہاہ _____ 20

BC-12-3612

03469779319 کے لئے منظور ہے۔

14203-2063195

عزیز الرحمن کیسٹن 193

14203-6858573-1

0332 8542253