


FORM OF ORDER SHEET

Court of _____

Appeal No. 2462/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/11/2024	<p>The appeal of Mr. Akhtar Munir presented today by Mr. Taimur Ali Khan It is fixed for preliminary hearing before Single Bench at Peshawar on 21.11.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL NO. 2462 /2024

Akhtar Munir

VS


Police Deptt

I N D E X

S.No	Documents	Annexure	Page No.
01	Memo of Appeal	-----	01-05
02	Affidavit	-----	06
03	Copies of medical reports	A	07-22
04	Copies of charge sheet alongwith statement of allegations, inquiry report, show cause notice and dismissal order dated 25.07.2024	B,C,D&E	23-28
05	Copy of departmental appeal	F	29
08	Vakalat Nama	-----	30

APPELLANT

THROUGH:


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT
Cell No.03339390916
&

(SHAKIR ULLAH TORANI)
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 2462 /2024

Akhtar Munir, Ex-Class-IV (Cook),
Elite Force, HQrs Peshawar.

(APPELLANT)

VERSUS

1. The Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
2. The Superintendent of Police, HQrs, Elite Force, Peshawar.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974
AGAINST THE ORDER DATED 25.07.2024, WHEREBY
THE APPELLANT HAS BEEN DISMISSED FROM THE
SERVICE AND AGAINST NOT TAKING ACTION ON THE
DEPARTMENTAL APPEAL OF THE APPELLANT
WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

THAT THE ACCEPTANCE OF THIS APPEAL, THE
ORDER DATED 25.07.2024 MAY PLEASE BE SET ASIDE
AND THE APPELLANT MAY KINDLY BE REINSTATED
INTO SERVICE WITH ALL BACK AND
CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY
WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND
APPROPRIATE THAT MAY ALSO BE AWARDED IN
FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

1. That the appellant was appointed as Class-IV (Cook) in the respondent department in the year 2019 and since his appointment, the appellant was performing his duty with devotion and honesty, whatsoever, assigned to him and no complaint has been filed by his superiors regarding his performance.
2. That the appellant while serving in the said capacity in bungalow of respondent No.1 at Islamabad became ill on 01.07.2024 and the official working at bungalow of respondent No.1 took the appellant to Federal Government Hospital Polyclinic, Islamabad and due to no recovery he went again to the same Hospital on the next day i.e 02.07.2024, however he was recovered due to which he was directed by the wife of respondent No.1 to go to his village Swabi or Peshawar for proper treatment on which the appellant came to Swabi and went to MTI THQ Hospital Chota Lahore Swabi on 04.07.2024, however, he was not recovered, therefore, his brother again took him to Bacha Khan Medical Complex Swabi at 4:AM on 05.07.2024 and after emergency treatment he was discharged from Hospital at noon, however, at evening the appellant was not feeling well, therefore, his brother took him to Dr. Fawad for checkup at evening, however Dr. Fawad advised to the brother of the appellant to take him to Dr. Shams Ur Rehman, who is working in Bacha Khan Medical Complex Swabi on which the brother of the appellant took the appellant to Bacha Khan Medical Complex Swabi on 07.07.2024, wherein he was admitted on 09.07.2024 and then discharged from Bacha Khan Medical Complex Swabi on 13.07.2024 and after discharge from Bacha Khan Medical Complex Swabi, CDI Mehar Ullah directly took the appellant from Hospital to Islamabad to appear him before respondent No.1 however, he was not allowed to appear before respondent No.1 and as he was not feeling well, he came to his village Swabi and on next day i.e 15.07.2024 the appellant went to Prime Teaching Hospital Peshawar on 15.07.2024 for his check up and again went to Prime Teaching Hospital Peshawar on 19.07.2024 on which he was admitted in the Prime Teaching Hospital Peshawar for treatment and was discharged from the Prime Teaching Hospital Peshawar on 24.07.2024, which are evident from the medical report of the appellant. The appellant after discharge from Hospital went directly to Headquarter of Elite Force at Peshawar, where he met with DSP Ijaz Abazai and as the Doctor of the Prime Teaching Hospital Peshawar advised the appellant for ten days bed rest, therefore, DSP Ijaz Abazai told the appellant to take some rest as per advice of the Doctor. (Copy of medical reports are attached as Annexure-A)
3. That although the high ups of the appellant have knowledge about the illness of the appellant and his treatment, but despite that charge sheet along with statement of allegations were issued on 15.07.2024 and as the appellant was in Hospital, therefore, his charge sheet was received

by the father of the appellant and when the appellant was fully recovered from illness, he went to Headquarter of Elite Force at Peshawar on 06.08.2024 to submit his reply, but he was informed that he has been dismissed from service vide order dated 25.07.2024 and handed over inquiry report and show cause notice dated 22.07.2024 alongwith the dismissal order dated 25.07.2024 to the appellant. (Copies of charge sheet alongwith statement of allegations, inquiry report, show cause notice and dismissal order dated 25.07.2024 are attached as Annexure-B,C,D&E)

4. That the appellant filed departmental appeal on 08.08.2024 against the dismissal order dated 25.07.2024, which was not responded within the statutory period of ninety days. (Copy of departmental appeal is attached as Annexure-F)
5. That the appellant now wants to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

GROUND:

- A) That the orders dated 25.07.2024 and not taking action on the departmental appeal of the appellant within the statutory period of ninety days are against the law, rules, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B) That the appellant was never associated with the inquiry proceeding in order to defend himself and gave the real reason of his absence as the appellant was in Hospital and under treatment at the time of inquiry proceeding, which is violation of law and rules and as such the impugned order is liable to be set aside on this ground alone.
- C) That when the appellant became ill on 01.07.2024 in Islamabad working in the bungalow of respondent No.1, he was took to Federal Government Hospital Polyclinic, Islamabad by the official working at the bungalow and when he was not recovered by the treatment Federal Government Hospital Polyclinic, Islamabad he was directed to go to home for proper treatment on which he came to his village Swabi and was admitted in Bacha Khan Medical Complex and when discharge from the Bacha Khan Medical Complex Swabi on 13.07.2024, C/DI Mehar Ullah directly took the appellant from Hospital to Islamabad to appear him before respondent No.1 however, he was not allowed to appear before respondent No.1 and as the appellant was not feeling well, he came to his village Swabi and on next day i.e 15.07.2024 the

appellant went to Prime Teaching Hospital Peshawar on 15.07.2024 where he was admitted in the Hospital for treatment and was discharge from the Prime Teaching Hospital Peshawar on 24.07.2024 and when the appellant discharge from Hospital he went directly to Headquarter of Elite Force at Peshawar, where he met with DSP Ijaz Abazai and as the Doctor of the Prime Teaching Hospital Peshawar advise the appellant for ten days bed rest, therefore, DSP Ijaz Abazi told the appellant to take some rest as per advice of the Doctor, which means that the respondent department have knowledge about the illness and his treatment, but despite that charge sheet was issued the appellant on the basis of absence which is against the norms of justice and fair play.

- D) That even at the time of issuance of charge sheet dated 15.07.2024 the appellant was under treatment in Bacha Khan Medical Complex Swabi due to which his charge sheet was received by the father of the appellant.
- E) That the high ups of the appellant have knowledge about the illness of the appellant and his treatment, therefore, there is no need of inquiry on his absence, but it was the legal right of the appellant that respondent department should grant medical leave to the appellant and no action should take again him on the basis of absence.
- F) That the appellant was under treatment at the time of issuing show cause notice dated 22.07.2024 and was dismissed from service just after three days on 25.07.2024 without opportunity of reply to show cause notice despite the fact that the high ups of the appellant have knowledge about the illness and his treatment, even the show cause notice was not communicated to the appellant before dismissal order, which also shows the malafide on the part of respondent department.
- G) That the appellant did not intentionally remain absent from his duty but due to his illness, he was unable to perform his duty for some days, and was compel to remain absent from his duty, therefore, needs to be treated with lenient view.
- H) That the penalty of dismissal from service imposed upon the appellant is very harsh, which is passed in violation of law and rule, therefore, the same is not sustainable in eyes of law and hence liable to be set aside.
- I) That opportunity of personal hearing and personal defense was not provided to the appellant in order to the gave the reason of his

absence, which is against the spirit of Article 10-A of the Constitution of Pakistan.

- J) That the appellant has not been treated according to law and rules, which is violation Article-4 of the Constitution of Pakistan and as such the impugn order dated 25.07.2024 is liable to be set aside.
- K) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that on the acceptance of this appeal, the order dated 25.07.2024 may please be set aside and the appellant may kindly be reinstated into service with all back and consequential benefits. Any other remedy which this Honorable Tribunal deems fit and appropriate that may also be awarded in favour of appellant.

THROUGH:


APPELLANT
Akhtar Munir


(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT
&

(SHAKIR ULLAH TORANI)
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL NO. _____/2024

Akhtar Munir

VS

Police Department

AFFIDAVIT

I, Akhtar Munir, Ex-Class-IV (Cook), Elite Force, HQrs Peshawar, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.


DEPONENT

1-7/24

فیڈرل ایمریٹ ہسپتال، اسلام آباد

24622

فیڈرل ایمریٹ ہسپتال، اسلام آباد

باب / روم نمبر

Handwritten signature

طالع

دائیں کا دورہ

Temp / Lin +

Temp 98.2

Bodyache
A day

BP 120/80

My Head Soony + hv

2/7/24

برقی مراکز بیرون بریطان
فیڈرل گورنمنٹ ہسپتال، اسلام آباد

MS

9

مریض
50
Alicha
med

طابق
رہی کا ڈورہ

Plc -
Fever & body aches
Loose stools & blood
01 JUL 2024

Rx Tab Paracetamol
2x2 (T.D)
- CBC
Dengue ns

Refer to ER

Soft stool urgent
Call for a meal
Painful
Erythematous
Start



OUTPATIENT DEPARTMENT (OPD)
MTI THQ HOSPITAL CHOTA LAHORE

9

Akhtar number

04/01/2018

245

Presenting Complaints

Reaction
due to over
dose of medication
From out side
Private hospital

BP 140/80

Investigations

1st medicine

INF. Pravas

inj Oxidil 1 gm

inj Avit + Dext

Diagnosis

R

O₂ Inhalation

Pass in line

Inj. Salocortel
25mg in Slow

Cold Sponging

Refer to BKMCL
For Further
Investigation

Remarks

Stamp & Signature of Prescriber

Plan

16



BACHIA KHAN MEDICAL COMPLEX
 MEDICAL TEACHING INSTITUTE (MTI), SUI-81
DEPARTMENT OF CLINICAL PATHOLOGY & BLOOD BANK
 JOHNDER BACHIA KHAN SUIVA PAKISTAN
 TEL: 062-928-11114 / Fax: 062-928-11115 / Email: info@bkmc.com.pk

Referral:	W. 11/10/2024/271/47	Referral By:	Emergency
Patient Name:	AKHATR MUNIR	Referral No:	
Age / Sex:	7 / Female	Print Date:	05-Jul-2024 14:34:52AAE
Record ID:	BKMC-24-0705-40	Test Date:	05-Jul-2024 03:58
		Others ID:	

Urine Analysis
URINE DIR

Color:	Pale Yellow	Pale Yellow to Deep Amber
Appearance:	Clear	
pH:	Acidic	7.0 (Range 4.6 to 8.0)
Specific Gravity:	Nil	Nil
Albumin:	Nil	Nil
Bilirubin:	0.3 - 0.5	Nil
Urobilinogen:	0.1 - 0.3	Nil
Leucocytes:	Nil	Nil
Erythrocytes:	0	Nil

Clinical Comments :

BLEED BANK

11

ACCIDENT AND EMERGENCY DEPARTMENT
BACHA KHAN MEDICAL COMPLEX (MTI) SWABI

CNIC No _____

Patient Name / F.Name	Date	MR#	Age	Gender
Alicha Munex	05/07/24	25		M

Address: _____

Patient Classification:

AM <input type="checkbox"/>	Trauma / RTA <input type="checkbox"/>	Medical Emergency <input type="checkbox"/>	Surgical Emergency <input type="checkbox"/>
Time 1 2 3 4 5 6 7 8 9 10 11 12	Pediatric <input type="checkbox"/>	Gynea /OBS: <input type="checkbox"/>	Bomb Blast <input type="checkbox"/>
PM <input type="checkbox"/>	Poisoning <input type="checkbox"/>	Fire Arm <input type="checkbox"/>	Others <input type="checkbox"/>
			Bites <input type="checkbox"/>

Sr. #	Chief Complaints	Duration
1	Reaction due to medication from	
2	out side of hospital	
3		

Triage Category

Green
Yellow
Red
White/Black

Examination Findings: Pulse 97 BP 117/66 mmHg Temp: _____ C/F SPO₂ 96%

Skin	Eye/Ear	CVS	Respiratory	CNS	GIT	GU

Provisional Diagnosis: _____

ITW his 22/24

Investigations:

Management Plan

	Ordered Findings/Report
CBS	<input type="checkbox"/>
RBS	<input type="checkbox"/>
Urea	<input type="checkbox"/>
Creatinine	<input type="checkbox"/>
MP	<input type="checkbox"/>
Tongue	<input type="checkbox"/>
ECG	<input type="checkbox"/>
XRay	<input type="checkbox"/>
Other	<input type="checkbox"/>

Done Dexa + AVIT

ITW stay

Just - N/S S/O & ITW

ST

Diagnosis: _____

Outcome:

- 1. Discharged
- 2. Admitted
- 3. Referred

Reason for Referral _____

Cause of Death _____

1A

AWAD KHAN

Phone: 0333-9617546

DC No: 2191-N

BS, RMP

Physician & Surgeon

Principle Medical Officer Health Dep.

ڈاکٹر نواد خان

Registered
With HCC
#01446

12

me..... Akhtas Mumtaz Date 5.7.24

Medical Record

Rx

1- 1000 Cefixime 1000

2- 10 Nims 1000

3- 10 Basoquin

4- 1000 Ceflex

5- 10 Azidomol

6- 10 Dym 30

7- 1000 Penicillin

Advised to take all these medicines for

seven days with 5 $\frac{7}{24}$

DR. AWAD KHAN
MBBS
Senior Medical Officer
Health Department KPK

NOT VALID FOR COURT

سپر 4 بجے سے نماز
صوبائی جہانگیرہ روڈ

اورنگ آباد

بروز اتوار کلینک بند ہے گا۔ 13

صبح 9 بجے سے دوپہر 1 بجے تک

دوبندی جہانگیرہ ریزو سکیل خان مارکیٹ

اورنگ آباد

SI
191-
24

B

Normal =

Normal =

TP.

6/3

any

ALMADINA Clinical Lab

HCC Reg# 01446



Dr. Fawad Khan

MBBS, RMP, Physician & Surgeon Ex, P.M.O Health Department

المدینه کلینکل لیبارٹری

13

Patient Name: Abdul Naveed Sex Male Age 5-7 Date 5-7-16

Test: U.R.U

Ref. By: Dr

Clinical Hematology			Clinical Chemistry		
Test	Result	Normal Value	Test	Result	Normal Value
TLC		4000 / 11,000 cmm	Blood Sugar "R"		70 — 170 mg/dl
Neutrophils		55—70%	Blood Sugar "F"		60—110 mg/dl
Lymphocytes		20—40%	Blood Cholesterol		Up to 200 mg/dl
Monocytes		02—10%	Blood Triglyceride		80 — 180 mg /dl
Esinophils		02—05%	LDL		< 129 mg/dl
Basophils		Up to 1.0%	HDL		> 35 mg /dl
HB Estimation		M/12-18 F/11-16G/dl	SGPT (ALT)		05 — 45 U/L
ESR		M/18, F/10 mm/1st H	Serum Bilirubine "T"		Up to 1.0 mg/dl
Bleeding Time		02—07 minutes	ALP		Adult 98-298 Ch 625 u/l
Clotting Time		03—10 minutes	Uric Acid	<u>6.5</u>	M/2-7F/2-6.5 mg/dl
Platelet counts		0.15—0.45 mill/cmm	Serum Calcium		8.2 — 10.2 mg/dl
HCT : (PCV)		30 --- 50 %	Serum Urea		25 — 45 mg/dl
Blood Group :			Creatinine		0.9 --- 1.3 mg/dl

Hematology Remarks:

Mp: Normal Type:

Typhidoit : IgG: Normal Typhidoit : IgM: Normal

Clinical Serology

ASOT :	Titre :	Normal Value: Less Than 200 lu/ml	<small>Lab's application marked</small>
RA Factor: <u>Normal</u>	CRP:		
Hbs Ag:	H.pylori :		
Anti HCV :	Dengue Ns1		
TB:	HIV	Toxo :	
Brucella : A	Brucella : M:	Pregnancy :	

Urine Routine Examination

PHYSICAL & CHEMICAL EXAMINATION		MICROSCOPIC EXAMINATION HPF	
Color		Pus Cells	
Sugar		RBCs	
Albumin (Protein)		Cal. Oxalate	
PH (Power of Hydrogen)		Epith. Cells	
Bile Salt		Mucus Thread	
Bile Pigment			

Remarks :

Muhammd Ubaid Ullah
 DMLT(KPK) Medical Faculty Peshawar
 Ex-Lab.Incharge LRBT Eye Hospital
 Akorra Khattak

Mob 0346-5641625

Lab. Incharge:

12A MEDIAN APARTMENT STRADEX
 12A, MEDIAN APARTMENT STRADEX
 12A, MEDIAN APARTMENT STRADEX
 12A, MEDIAN APARTMENT STRADEX
 12A, MEDIAN APARTMENT STRADEX

14



Address	Emergency
Address	
Phone	07-Jul-2024 3:45:39PM
Visit Date	07-Jul-2024 03:23
Other ID	

CBC

Haemoglobin (g/dL)	14.0	gm/dL
Hematocrit (%)	40.0	%
Red Blood Cell Count (x10 ¹² /L)	4.0	%
White Blood Cell Count (x10 ⁹ /L)	10.0	%
Platelet Count (x10 ⁹ /L)	200	%
Mean Corpuscular Volume (fL)	100	fL
Mean Corpuscular Hemoglobin (pg)	35	pg
Mean Corpuscular Hemoglobin Concentration (g/dL)	35	g/dL
Red Cell Distribution Width (fL)	12.5	fL
Red Cell Distribution Width Coefficient (%)	12.5	%

Dengue Screening

MP (MALARIAL PARASITES)

12A

Shams ur Rehman

MBS, FCPS (Pak), FACP (USA)
Consultant Physician & Head of
Department of Medicine
Dean MTI GKMC BKMC Swabi
Ph: 0311-9433411, 0332-9433411
E-mail: drshamskhan@yahoo.com



Institutional Based Practice
Bacha Khan Medical Complex Swabi
Medical Teaching Institution
Khyber Pakhtunkhwa, Pakistan

15
ڈاکٹر شمس الرحمن

ایف بی ایس (پاک)، ایف ایس سی پی (یو ایس اے)
میڈیکل پیڈیاٹرک سرجن، گروپ آف ہسپتال صوابی
بین الاقوامی آئی، ایس کے ایم سی، ایس کے ایم سی صوابی
کلیف: OPD، ایک ایچ ایم سی، ایچ ایم سی صوابی

Name: Alhan Maniv Age: _____ Sex: _____ Date: 9/7/24

1. Ad. it Med. ward in Can.
کھانے سے 30 منٹ پہلے صبح
کھانے کے فوراً بعد رات

	رات	دوپہر	صبح

2. Oral 2 gm. IV OD
کھانے سے 30 منٹ پہلے صبح
کھانے کے فوراً بعد رات

	رات	دوپہر	صبح

3. Tab. Aspirin 50
کھانے سے 30 منٹ پہلے صبح
کھانے کے فوراً بعد رات

	رات	دوپہر	صبح

4. Tab. Cap. 105
کھانے سے 30 منٹ پہلے صبح
کھانے کے فوراً بعد رات

	رات	دوپہر	صبح

5. Sp. Restus Am. 2 TS
کھانے سے 30 منٹ پہلے صبح
کھانے کے فوراً بعد رات

	رات	دوپہر	صبح

6. Sp. Pyrorit 2 TS
کھانے سے 30 منٹ پہلے صبح
کھانے کے فوراً بعد رات

	رات	دوپہر	صبح

7. _____
کھانے سے 30 منٹ پہلے صبح

	رات	دوپہر	صبح

F: 98
Sp: 110/70

Blood Gs
rep. Awaited

(17)



BACHA KHAN MEDICAL COMPLEX
(MTI) SWABI

Patient Identification	
- Alicheer Murrin	
- 30 yrs	
- MR- No = 28-689	
- Wkt ID = 25336840	

DISCHARGE SUMMARY

Attending Physician: Dr. Imran

Clinical Service: mmw (A)

Date of Admission: 9/7/24

Date of Discharge: 13/7/24

Secondary Diagnosis (es): CAP, Ectopic focus, ? Acute febrile illness ?

Brief History & Hospital
Fever
GBW (6 days)

Investigation
BLTs --- CBC hb 13 pt 215 TCC 8.76 RFTs
- U/S Abd & pelvis - fatty liver grade I Liver Normal
- Blood U/S & urine c/s (awaited) LFTs Normal

Procedures / Operations:
Echocardiography chest: B/L clear
ECG: No added sounds
CNS & GCS 15/15 oriented to P.P.
Sensation intact
Motor intact
GPR: Normal

Discharge Medication:
- ORS sachet 1L ✓
- Tab flaxyl ✓
- Tab Neurobion ✓
- 1st National bank ✓

Follow-up instruction:
1+1+1
- Tab chloroquine ✓
- 1st National bank ✓
- Cap Mixel 40mg ✓
- Cb/ce ✓

Follow up in med OPD
with blood c/s
after 1 week.

Nurse: _____ Signature: _____ Doctor: Dr. Imran Signature: _____

18



PRIME TEACHING HOSPITAL

Warsak Road Peshawar

Tel: 091-5200663-4

Asst. Prof. Dr. Bakht Jehan

MBBS, FCPS (Neurology)
Consultant Neurologist
Peshawar Medical College

Name: Akhtar Munir Age: 30yrs Sex: M Address: Swabi Weight: kg Date: 15-07-24 10:24:29

اپنا MRN نمبر یاد رکھیں۔ اور دوبارہ آنے کی صورت میں یہ ٹیگ ضرور ساتھ لائیں۔ **MRN: 2024-07-34891**



20
1:0
20

-F

Sk

1.D

2

1

ke



PRIME TEACHING HOSPITAL

Warsak Road Peshawar

Tel: 091-5200663-4

DIAGNOSTIC SERVICES

MRN 2024-07-34891 Lab No 328782
Name Akhtar Munir Date 15/07/2024 11:13:24
Gender M Age 30yrs
Ref. By Dr. Bakht Jehan Specimen Blood

TEST RESULT OLD RESULTS UNITS NORMAL RANGE

Others

MP Negative

Haematology

Blood Complete (CBC)

Haemoglobin	15.5	g/dL	Male: 12.0 - 18.0 Female: 11.0 - 16.0
TLC	9240	/cmm	4500 - 11500
DLC			
Neutrophils	55.0	%	40 - 75
Lymphocytes	35.1	%	20 - 40
Monocytes	8.0	%	4 - 8
Eosinophils	1.5	%	0 - 6
Basophils	0.4	%	0.0 - 1.0
Platelets count	298000	/cmm	150000 - 450000
RBC	5.29	$10^6/uL$	3.50 - 5.50
PCV	46.3	%	Male: 40 - 57 Female: 37 - 48
MCV	87.5	fL	76 - 96
MCH	29.2	pg/cell	27 - 32
MCHC	33.4	g/dl	32 - 36
RDW-CV	12.8	%	11.0 - 16.0
RDW-SD	42.9	fL	35.0 - 56.0
MPV	10.2	fL	6.5 - 12.0
PDW	16.5		15.0 - 17.0

NOTE:

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



PRIME TEACHING HOSPITAL

Warsak Road Peshawar

Tel: 091-5200663-4

20

Free slip
R

Asst. Prof. Dr. Bakht Jehan

MBBS, FCPS (Neurology)

Consultant Neurologist

Peshawar Medical College

Name: Akhtar Munir Age: 30Yrs Sex: M Address: Swabi Weight: kg Date: 19-07-24 12:16:53

اپنا MRN نمبر یاد رکھیں۔ اور دوبارہ آنے کی صورت میں یہ نسخہ ضرور ساتھ لائیں۔
MRN: 2024-07-34891



Act. Dr. P. J.

Medical Officer

Prime Teaching Hospital

Swabi

Dr. Bakht Jehan

Neurology

19-07-24

12:16:53

Signature

(21)

25489754

PRIME TEACHING HOSPITAL
Peshawar

19 July 2024

REFERRAL LETTER

VISIT ID: 25489754 Visit Date: 19-JUL-2024 12:07

PATIENT PICTURE 	PATIENT:	102011877185	FAMILY HEAD:	1020107314707	QR CODE
	RELATION:	Son	CONTACT #:		
	GENDER:	MALE / UNMARRIED	DISTRICT:	Swabi	
	DOB & AGE:	05-MAY-1994, 30	ATTENDANT NAME:		
	Secondary Cover SCP		20,400		
Tertiary Cover SCP		400,000			

<p><i>Low Back Pain</i></p> <p><i>Swabi body of</i></p>	Diabetes	
	IIID/ Hypertension	
	Hepatitis B / C	
	Asthma/ COPD	

Pulse	Respiration	Temperature	Blood Pressure

Blood CT	X-Ray	Others:
BSR	ECG	
Viral Marker B/C	LFTs	
USG	RFTs	

Backal. (Lumbago).

OPD	Surgical Admission	Medical Admission	Antenatal/Post Natal	Follow Up

Expected Length of Stay 05 Days

[Signature]
Attending Physician Name / Sign & Stamp

Complaints / Findings / Investigation

COMPLAINTS:

low backache

Fever

Generalized body aches

FINDINGS:

CNS - Conscious, Alert

CVS - S₁ + S₂ +0

Resp. B/L chest clear

GIT - soft and non-tender abdomen

INVESTIGATION:

Lab: CBC. Hb. 13.8

TLC. 6150

PLT. 246000

M.P. negative

X-Ray: LFT'S T.B. D.O.S

ALT 101

AST 55

U/S: RET'S

Blood urea - 34

S. Creatinine 0.7

Pt. Akhla Munis 31yrs

Histopathology:

with C/C of
Fever, Generalized body
Now the Pt is improve. in
on Discharge.

Operative Finding / Details:

Cap. Depriap 20mg P/O OD (morning)

Treatment at Hospital:

Inj. Calamox 1.2g IV TDS

Inj. Risek 40mg IV OD

Inj. N/saline 500ml IV BD

Tab. Advinc Fort 1tab P/O BD

Tab Prothiadin 25mg P/O OD (night)

Inj end/Dexa 1/2 IV STAT.

Sub. Provas 1/2 IV BD

(20/20)

PRIME TEACHING HOSPITAL

Warsak Road Peshawar

Tel: 091-5200663

MRN: 2024-07

DISCHARGE CARD

Admission No 4088-03 Ward R/B

Name Akhtar Munir

F/H Name Roshem Khan

Age 31 yrs Sex Male

Address Swat

D.A. 19/7/24 D.O. D.D. 24-7-

Diagnosis Chronic headache / Depression

Operation

Condition on Discharge Improved and

Stable on Discharge

TREATMENT

گھر کیلئے علاج

Tab. Augmentin 1g

(1+1)

Tab. Cap. Rizol 40mg

ایک گولی روزانہ بار صبح (1)

Tab. Abirac Forl

(1+1)

Tab. Prothiadin 25mg

ایک گولی روزانہ (رات کو) جاری

Cap. Deptricap 20mg

ایک گولی روزانہ (صبح) جاری

حفاظت کے لیے ایک ماہ

MEDICAL OFFICER

گھر کیلئے علاج

بہتر نتائج کے لیے احتیاطی تدابیر

*
*
*

22-A

Color
Apper
PU
Sugar
Albumin
PUS C
WBC
Epithel
Mucus P
Clinical C



OFFICE OF THE SUPERINTENDENT OF POLICE,
HQRS, ELITE FORCE PESHAWAR



CHARGE SHEET

I, Shabir Hussain Shah, Superintendent of Police, HQrs, Elite Force, Khyber Pakhtunkhwa Peshawar as competent authority, hereby charge you, Class IV Akhtar Munir (Cook) of Elite Force as follows:

1. As per vide DD report No.40, dated: 04.07.2024 of Elite Force, HQrs, Peshawar, you still absented yourself from place of posting without prior permission from 04.07.2024 till todate, which shows a great misconduct on your part.
2. By reason of the above, you appear to be guilty of misconduct under the Civil Servants (Efficiency & Disciplinary) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in the said rules.
3. You are, therefore, directed to submit your defense within seven days of the receipt of this Charge Sheet to the Enquiry Officer.
4. Your written defense, if any, should reach the Enquiry Officer within the specified period, failing which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
5. You are directed to intimate whether you desire to be heard in person.
6. A statement of allegation is enclosed.

SHABIR HUSSAIN SHAH
Superintendent of Police,
HQrs Elite Force, Peshawar.

اس کی واپس لے کر
کو دور رسول کی ہے اور
اللہ اعظم جان ہے
2 پھاشر

nic no - 16250/733420

روشن خان

24



OFFICE OF THE SUPERINTENDENT OF POLICE,
HQRS. ELITE FORCE PESHAWAR



SUMMARY OF ALLEGATIONS

1. Shabir Hussain Shah, Superintendent of Police HQrs. Elite Force, Khyber Pakhtunkhwa Peshawar as competent authority, am of the opinion that Class IV Akhtar Munir (Cook) has rendered himself liable to be proceeded against departmentally as he has committed the following acts and omissions within the meaning of Civil Servants (Efficiency & Disciplinary) Rules, 2011.

SUMMARY OF ALLEGATIONS

1. As per vide DD report No.40, dated: 04.07.2024 of Elite Force, HQrs, Peshawar, He still absented himself from place of posting without prior permission from 04.07.2024 till todote, which shows a great misconduct on his part.

2. For the purpose of scrutinizing the conduct of the said delinquent Class-IV with reference to the above allegations Mr. Ilaz Abazai DSP/HQrs. Elite Force, Peshawar is appointed as Enquiry Officer.

3. The Enquiry Officer shall, in accordance with the provision of the said Ordinance shall provide reasonable opportunity of hearing to the delinquent Class-IV record statements etc. and submit findings within (25 days) after the receipt of this order.

4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the enquiry officer.

SHABIR HUSSAIN SHAH
Superintendent of Police,
HQrs. Elite Force, Peshawar.

No. 1431-35/R/SP/HQrs/EF,

dated Peshawar the 15 /07/2024.

Copies to the:-

1. Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
2. Accountant, of Elite Force, Khyber Pakhtunkhwa Peshawar.
3. OASI/SRC/ FMC, Elite Force, Khyber Pakhtunkhwa Peshawar.
4. This Charge Sheet and Summary of Allegations to be served upon the delinquent Class IV Akhtar Munir (Cook) through reader to DSP/HQrs. Elite Force, Peshawar.

اس کی کاپی جوائنٹ اور اس کے ساتھ ساتھ
دو کاپیوں کو ایف ڈی کے ذریعے
11/20/2024-07334-20

SHABIR HUSSAIN SHAH
Superintendent of Police,
HQrs. Elite Force, Peshawar.



OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE,
HEADQUARTERS, ELITE FORCE, PESHAWAR.



No 57 /R. DSP/EF, HQrs

Date: 29 /07/2024.

To: The Superintendent of Police,
HQrs, Elite Force, Khyber Pakhtunkhwa, Peshawar.

Subject: DEPARTMENTAL ENQUIRY AGAINST CLASS-IV AKHTAR MUNIR
(COOK)

Kindly refer to your office Endst: No.1431-35/R,SP/HQrs, EF dated Peshawar the 15.07.2024.

In pursuance of your kind directives, the undersigned has completed enquiry in the above cited case. Its stepwise detail is given below:

ALLEGATIONS:

That As per vide DD report No.40, dated: 04.07.2024 of Elite Force, HQrs, Peshawar, He still absented himself from place of posting without prior permission w.e. from 04.07.2024 till todate, which shows a great misconduct on his part.

PROCEEDINGS:

In this regard, Superintendent of Police HQrs Elite Force Khyber Pakhtunkhwa issued him Charge Sheet & Summary of Allegations and Deputy Superintendent of Police Headquarters Elite Force was appointed as enquiry officer.

Charge Sheet & Summary of Allegations was served upon the delinquent Class-IV's father on 16.07.2024, in reply to Charge Sheet & Summary of Allegations the delinquent Class-IV neither appeared in person before the undersigned nor submitted his written statement. Similarly, in this connection the statement of CDI Elite Force HQrs Peshawar was also recorded. (Enclosed)

CONCLUSION/ RECOMMENDATION:

Having gone through the all materials placed on record as under:


- Charge Sheet and Summary of Allegations,
- Reply to Charge Sheet and Summary of Allegations,
- Statement of CDI,

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Having gone thorough all documents placed on record of enquiry, it was reflected that the delinquent Cook did not take interest in duty and left place of posting without any leave and absented himself from legitimate duty without prior permission. the delinquent cook was time and again contacted via his personal Cell No.0313-9054118 as well as summon was served upon him to ensure his arrival during the course of enquiry to state his position but he deliberately denied order and did not appeared personally.

It is therefore recommended that allegations leveled against the delinquent Class-IV Akhtar Munir (Cook) stand proved.


IJAZ ABAZAI
Deputy Superintendent of Police,
HQrs. Elite Force, Peshawar.



OFFICE OF THE SUPERINTENDENT OF POLICE,
HQRS, ELITE FORCE PESHAWAR



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FINAL SHOW CAUSE NOTICE

I, Shabir Hussain Shah, Superintendent of Police HQrs, Elite Force, Peshawar, as competent authority, under the Civil Servants (Efficiency & Disciplinary) Rules, 2011 do hereby serve upon you Class-IV Akhtar Munir (Cook) of Elite Force as follow:

That as per vide DD report No.40, dated: 04.07.2024 of Elite Force, HQrs, Peshawar, you still absented yourself from place of posting without prior permission w.e from 04.07.2024 till todote.

1. Ongoing through the finding and recommendation of the enquiry officer, the material placed on record, I am satisfied that you have committed the omission/commission specified in Police Rules and charges leveled against you have been established beyond any doubt.

2. As a result therefore, I; Shabir Hussain Shah, Superintendent of Police HQrs, Elite Force, Peshawar as competent authority have tentatively decided to impose major penalty upon you, under the Civil Servants (Efficiency & Disciplinary) Rules, 2011.

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

4. If no replay to this notice is received within stipulated time of its delivery in normal course of circumstances, it shall be presumed that you have no defence to put in and in that case an ex- parte action shall be taken against you.

SHABIR HUSSAIN SHAH
Superintendent of Police,
HQrs, Elite Force, Peshawar.

No. 1480-81 /R,SP/HQrs, EF,

Date: 22 /07/2024

This final show cause notice served upon the delinquent Class-IV Akhtar Munir (Cook) through reader to DSP/HQrs, Elite Force, Peshawar and report this office.



OFFICE OF THE SUPERINTENDENT OF POLICE,
HQrs, ELITE FORCE PESHAWAR



No. 1482-87R, SP/HQr, EF,

date 25/07/2024.

ORDER

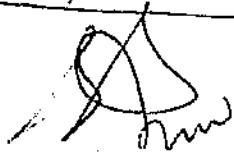
This order will dispose of the departmental enquiry against the delinquent Class-IV Akhtar Munir (Cook), that as per vide DD report No.40, dated: 04.07.2024 of Elite Force, HQrs, Peshawar. He still absented himself from place of posting without prior permission w.e. from 04.07.2024 till todote.

In this regard Charge Sheet and Summary of Allegations vide No.1431-35/R/SP/HQrs/EF, dated: 15.07.2024 was issued him and Mr. Ijaz Abazai/DSP/HQrs, Elite Force, Peshawar was appointed as enquiry officer. Enquiry officer recommended that allegations leveled against the delinquent Class-IV stand proved.

Similarly, the delinquent Class-IV was served vide Final Show Cause Notice No.1480-81/R,SP/HQrs, EF, dated: 22.07.2024 through his father namely Azam Khan but the delinquent Class-IV neither appeared in person before the undersigned nor submitted his written reply to final show cause notice.

Therefore I, Mr. Shabir Hussain Shah, Superintendent of Police, HQrs, Elite Force, Peshawar, being a competent authority in view of the above facts and recommendation of enquiry officer, major punishment "dismissal from service" is hereby awarded upon the delinquent Class-IV Akhtar Munir (Cook) from the date of absence, under Police Rules 1975 (Amended 2014)

Order announced!


SHABIR HUSSAIN SHAH
Superintendent of Police,
HQrs, Elite Force, Peshawar.

Copy of the above is forwarded for information to the:

1. Deputy Commandant, Elite Force, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Superintendent of Police, HQrs, Elite Force, Peshawar.
3. Accountant, of Elite Force, Khyber Pakhtunkhwa Peshawar.
4. SRC /OASI Elite Force Khyber Pakhtunkhwa, Peshawar.
5. FMC Elite Force Khyber Pakhtunkhwa, Peshawar along with (13 Pages).

Seep


خدمت صاحب ایڈیشنل I صاحب ایلیٹ فورسز KPK ایٹار

جی۔ اے۔ عالی

گزارش بجاتی ہیکم سائل بحوالہ آرڈر نمبری 482-07

معرض 25/07/24 نوکری سے درخواست ہو چکا ہے۔
معرض خدمت ہوں۔ کہ من سائل کیفیت لگ سکے۔
ایڈیشنل I صاحب میں اپنی ڈیوٹی بحری ادا کر رہا تھا۔ کہ
معرض 24/07/24 کو اپنے جائے تعیناتی میں شدید بخار میں مبتلا ہو گیا
بنگلہ میں سرکاری ڈرائیور خانزید نے فوری طور پر ہسپتال
طبی امداد کے خاطر گورنمنٹ پولی کلینک ہسپتال اسلام آباد
لے گئے۔ بعد طبی امداد بنگلہ آکر اپنی ڈیوٹی شروع کی۔
اگلے دن سائل کو کھیر شدید بخار ہوا۔ ڈرنا شروع ہوا۔
فوری طور پر شدید بخار ہالا ہسپتال لے گئے۔ لیکن کوئی اقدام
نہ ہو سکا۔ جسکی وجہ سے (2) یوم پتیرا ضرر رہا۔
سائل نہایت غریب شخص ہے۔ ذریعہ معاش کا دوسرا کوئی
واسطہ نہیں ہے۔

لہذا بندر پور درخواست استناداً ہیکم سائل کو دوبارہ نوکری
پیر بحال کرنے کا حکم صادر فرمادیں۔ سائل تاحیات دماغ رہے۔

آپ کا تالعدار اختر صاحب کل - 9054118-0313

نوٹ: فیڈ بیکل کاغذات ہمراہ لے جائے۔

VAKALAT NAMA

NO. _____/2024

IN THE COURT OF KP Service Tribunal, Peshawar

Akhtar Munir

(Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Police department

(Respondent)
(Defendant)

I/We, _____

Do hereby appoint and constitute **TAIMUR ALI KHAN, ADVOCATE HIGH COURT AND SHAKIR ULLAH TORANI ADVOCATE**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/2024



(CLIENT)

ACCEPTED



TAIMUR ALI KHAN
Advocate High Court

BC-10-4240
CNIC: 17101-7395544-5
Cell No. 03339390916

&

SHAKIR ULLAH TORANI
Advocate Peshawar
BC-22-4994
03409146056