From: Nadeem khan [mailto:nk342075@gmail.com]
Sent: Monday, May 29, 2023 6:20 PM
To: muhammadmuslehuddin@chipconsulting.org
Cc: KHAN, Saifullah <skhan@who.int>; KHURSHID, Muhammad Naveed <khurshidm@who.int>; Naila
Nizam <naila.nizam@chipconsulting.org>; sundas.tariq@chipconsulting.org;
javeria.khattak@chipconsulting.org; Sabeen.khan@chipconsulting.org; Muhammad Imtiaz khalil
<m.imtikhalil@gmail.com>

Subject: Re: Show Cause on account of Political Involvement

To,

HR Department CHIP,

Training and Consulting.

Subject:- REPLY TO THE SHOW CAUSE NOTICE ISSUED BY YOUR ESTEEMED DEPARTMENT ON DATED MAY 24, 2023.

Dear respected Sir,

With profound respect, I have joined your esteemed

department/organization on September 2015 with my sweet will and performed my duties with zeal and zest.

Furthermore right from the scratch I have always followed the rules and regulations with my utmost endeavour till now. It is pertinent to mention here that I have never been involved in any illegal and political activities nor have affiliation with any political party.

It is note worthy to pin down here that I was arrested on dated 16th of May on mere suspicious basis, malafidely, without any cogent reason and plausible justification.

Moreover according to the instant FIR when the inncident took place time was shown as 12 pm dated 10/05/2023 and at that i was doing my duty at IDCH (ANNEX 6). This FIR was lodged against the persons unknown, in which I have not been directly charged and no role whatsoever been attributed to me as there is no iota of evidence there on the whole record against me to connect me with the commission of alleged offences thats why my bail application was allowed and released on bail thereto whereby the court order regarding my release categorically mentioned my innocence and non involment in the alleged offences.(release order is attached herewith). (ANNEX 5)

To add more here that on alleged day of occurrence I was doing and performing my duties and giving teams training (CHW) at IDCH to batch one on dated 9th may and on dated 10th may to batch two (ANNEX 1, 2&4). whereby my attendance sheet in which I have marked my proxy and Pictoral evidence are also available. Couple with the statement of Senior Medical Officer SGSMH, Peshawar and UCMO Khalisa-1, which shows my presence at IDCH.(copies are attached) (ANNEX 3).

It is worth mentioning here that due to my arrest and later on been sent to judicial lock up I was unable and unaware of the show cause notice issued on 19th of May and impotent to reply within the stipulated time.

Therefore, today I.e 29/5/23 after being released on bail the show cause notice came to my knowledge and submit the requisite statement on priority basis.

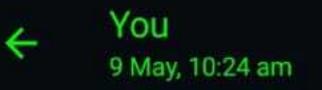
Keeping in view of my previous record and devotion to my work in fight against the preventive diseases under your esteemed organization, the notice issued against me may be set-aside, please.

Regards Nadeem Khan UCPO Khalisa-1





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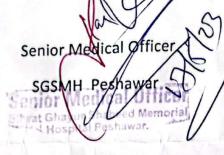


Attendance Record Of UCPO Khlisa-1 Dated 9th& 10th of May 2023

Mr Nadeem Khan S/O Muhammad Pervaiz UCPO Khalisa-1 remained present on his duty station on 9th and 10th of May 2023 at UC Khalisa-1 IDCH (Infectious disease Children Hospital Haji Camp Peshawar). The official shared his live location with his senior concerns showing his presence during duty hours. He also signed for his attendance in the daily attendance register (Annex-1)/

UCMO KKallsa-1 12/05/23 Nazif Khan

Date 17/05/2023 INCHARGE EPI Section Govt: Slfwat Ghayur Shaheed Memorial Hospital



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JUDICIAL MAGISTRATE-I, PESHAWAR

Order ... 01 27/05/2023

Muhammad Nadeem Khan Vs The State

The instant ball petition submitted through counsel during MOD. It be registered.

APP for the State and learned counsel for the accused/petitioner present. Arguments heard and record perused.

Accused/Petitioner, Muhammad Nadeem Khan S/o Parvez seeks post arrest ball in case FIR No.616 dated 10/05/2023 under Section 380/506/427/148/149/120-B PPC Police Station Fagirabad, Peshawar.

Perusal of record shows that the complainant reported about criminal intimidation and damages to the govt. property in furtherance of common object and criminal conspiracy and theft of ATM Machines from different banks.

Record further shows that all the Sections of law except Section 380 are bailable in nature, whereas the offence of theft as reported is not witnesses by anyone even by the complainant whereas no recovery has been shown of alleged stolen property. The I.O also failed to accumulate any direct evidence to suggest that the accused/petitioner was involved in the offence of theft. Furthermore, no specific role has been attributed to the accused/petitioner. Thus, in such like cases, grant of bail is a rule and its refusal is an exception. Reliance placed on PLD 217 Supreme Court 733. Apart from this, co-accused is on bail, therefore, rule of consistency is hereby granted to the accused/petitioner.

Therefore, in light of above, the present bail petition stands accepted. Accused/petitioner be released on bail,

Scanned with CamScanner

<u>بربل</u> نمبر:--002538

ابترائی اطلامی ربورٹ نسبت جرم قابل دست اندازی پولیس ربورٹ شدہ زیر دفعہ 154 مجموعہ ضابط نوجہ ارمی

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SI SYED MIR ABO UL HASSAN 10-05-2023

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