

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 166/2018

Date of Institution ... 06.02.2018

Date of Decision ... 11.02.2019

Ghulam Farooq, IHC No.2034/83, Police Lines, Peshawar. ... (Appellant)

VERSUS

The Provincial Police Officer, Peshawar and four others. ... (Respondents)

Mr. M. Asif Yousafzai,
Advocate

--- For appellant.

Mr. Kabirullah Khattak,
Additional Advocate General

--- For respondents.

MR. AHMAD HASSAN,
MR. HAMID FAROOQ DURRANI

--- MEMBER (Executive)
--- CHAIRMAN

JUDGMENT

AHMAD HASSAN, MEMBER.- Arguments of the learned counsel for the parties heard and record perused.

ARGUMENTS

2. Learned counsel for the appellant argued that he joined the Police Department as constable in 1999 and reached the rank of officiating ASI/IHC. On the allegations of willful absence from duty w.e.f 24.05.2017 to 05.07.2017 enquiry was conducted against the appellant and thereafter penalty of forfeiture of one year approved service was imposed on him. The period of absence was treated as leave without pay vide order dated 21.08.2017. As again the appellant remained willfully absent from duty w.e.f 10.07.2015 to 25.11.2015 disciplinary proceedings were instituted against the appellant and vide impugned order dated 22.08.2017 major penalty of removal from service was imposed on him. However,

he was not associated with the enquiry proceedings refer to above. He preferred departmental appeal on 19.09.2017 which was dismissed on 12.10.2017. Thereafter he filed review petition on 18.10.2017 which was accepted and the major penalty of removal from service was converted into compulsory retirement vide order dated 15.01.2018. The present service appeal has been filed against the said order. So far as order dated 22.08.2017 was concerned charge sheet and statement of allegations were not served on him and other basic ingredients of due process were also missing in this case.

3. On the other hand learned Deputy District Attorney argued that in both the cases the charge of willful absence against the appellant was proved beyond any shadow doubt. Moreover, the medical prescription submitted by the appellant on account of absence w.e.f 24.05.2017 to 05.07.2017 were found fake and bogus. Punishment was awarded to the appellant after fulfillment of codal formalities.

CONCLUSION

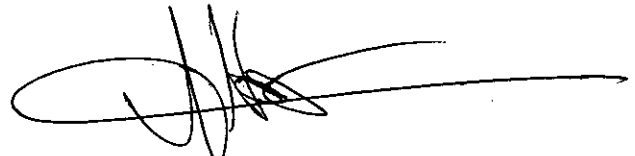
4. Perusal of record revealed that the appellant remained absence from duty on two occasions. Firstly from 24.05.2017 to 05.07.2017 (43 days) for which minor punishment of forfeiture of one year approved service was awarded to him. Thereafter, again he remained absent from 10.07.2015 to 25.11.2015 (four months and fifteen days). In the subsequent case though enquiry proceedings were conducted against the appellant but was not property associated with the same. Respondents were unable to rebut the stance of the learned counsel for the appellant that charge sheet/statement of allegations were not served on him. Similarly though show cause notice was issued but the same was not served on the

appellant. Moreover, a copy of enquiry report was not annexed with the show cause notice. Resultantly, opportunity of defense was denied to the appellant. In addition to above opportunity of personal hearing was also not afforded to the appellant. In short it can be inferred that he was condemned unheard.

5. As a sequel to above, the appeal is accepted, impugned order dated 15.01.2018 ^{is set aside} and the appellant is reinstated in service. The respondents are directed to conduct de-novo enquiry within a period of ninety days after the date of receipt of this judgment. The issue of back benefits shall be subject to the outcome of the de-novo enquiry. Parties are left to bear their own costs. File be consigned to the record room.



(HAMID FAROOQ DURRANI)
CHAIRMAN



(AHMAD HASSAN)
MEMBER


ANNOUNCED
11.02.2019

Order

11.02.2019 Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Habib Khan, Inspector for respondents present. Arguments heard and record perused.

Vide our detailed judgment of today of this Tribunal placed on file, the appeal is accepted, impugned order dated 15.01.2018 ^{is set aside} and the appellant is reinstated in service. The respondents are directed to conduct de-novo enquiry within a period of ninety days after the date of receipt of this judgment. The issue of back benefits shall be subject to the outcome of the de-novo enquiry. Parties are left to bear their own cost. File be consigned to the record room.

Announced:
11.02.2019


(Hamid Farooq Durrani)
Chairman


(Ahmad Hassan)
Member

06.11.2018

Due to retirement of Hon'able Chairman, the Tribunal is defunct. Therefore, the case is adjourned for the same on 03.12.2018 before D.B.



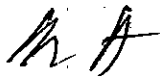
Riaz Ahmad Paindakhel

03.12.2018

Appellant in person present. Mr. Riaz Ahmad Paindakhel, Assistant AG alongwith Mr. Farmani Gul, S.I for the respondents present. Appellant requested for adjournment on the ground that his counsel is busy before the august Supreme Court of Pakistan. Adjourned. To come up for arguments on 17.12.2018 before D.B.



(Ahmad Hassan)
Member



(Muhammad Amin Khan Kundi)
Member

17.12.2019

Learned counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come for arguments on 11.02.2019 before D.B



(Hussain Shah)
Member



(Muhammad Amin Khan Kundi)
Member

22.06.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Farman Gul, S.I for the respondents also present. Written reply not submitted. Learned Additional AG requested for further adjournment. Adjourned. To come up for written reply/comments on 16.08.2018 before S.B.


(Muhammad Amin Khan Kundi)
Member

16.08.2018


Mr. Taimur Ali Khan, advocate counsel for the appellant present. Mr. Farmani Gul, SI alongwith Mr. Kabirullah Khattak, Addl: AG for respondents present. written reply/comments submitted on behalf of the respondents. Case to come up for rejoinder and arguments on 11.10.2018 before D.B.


Chairman

11.10.2018

Counsel for the appellant present. Mr. Farman Gul, SI alongwith Mr. Muhammad Jan, DDA for respondents present. Counsel for the appellant submitted rejoinder which is placed on file and seeks adjournment. Granted. Case to come up for arguments on 06.11.2018 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

12.04.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that on account of willful absence from duty disciplinary proceedings were initiated and upon conclusion "minor penalty of forfeiture of one year approved service" was imposed on him. The period of his absence was treated as leave without pay. In another case pertaining to absence from duty w.e.f 10.07.2015 to 25.11.2015 major penalty of removal from service was imposed on him vide order dated 22.08.2017. He preferred departmental appeal on 21.09.2017 which was dismissed on 12.10.2017. Thereafter he filed review petition on 18.10.2017 and the same was accepted by converting the penalty of removal from service into compulsory retirement vide impugned order dated 15.01.2018, hence, the instant service appeal. The appellant has not been treated according to law and rules.

Appellant Deposited
Security & Process Fee

Points urged need consideration. Admit, subject to limitation. The appellant is directed to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 04.06.2018 before S.B.


(AHMAD HASSAN)
MEMBER

04.06.2018




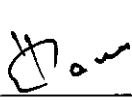
Counsel for the appellant and Addl: AG alongwith Mr. Farman Gul, S.I. for respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 22.06.2018 before S.B.


(Ahmad Hassan)
Member

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 166/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	06/02/2018	<p>The appeal of Mr. Ghulam Farooq presented today by Mr. Muhammad Asif Yousafzai Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	08/02/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>19/02/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	19.02.2018	<p>Junior counsel for the appellant present and seeks adjournment. Adjourned. To come up for preliminary hearing on 21.03.2018 before S.B.</p> <p style="text-align: right;"> (Gul Zeb Khan) Member</p>
	21.03.2018	<p>Appellant absent. Learned counsel for the absent. Adjourn. To come up for preliminary hearing on 12.04.2018 before S.B</p> <p style="text-align: right;"> Member</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 166 /2018

Ghulam Farooq

Vs

Police Deptt:

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal	-----	01-04
2.	Charge Sheet	--A--	05
3.	Statement Of Allegations	--B--	06
4.	Penalty Order	--C--	07
5.	Copy of Order dt: 22.08.2017	--D--	08
6.	Ex-parte Enquiry dt: 17.03.2017	--E--	09
7.	Appeal to CCPO	--F--	10
8.	Order of CCPO	--G--	11
9.	Appeal Appellate Board	--H--	12
10.	Order of Appellate Board	--I--	13
10	Walakat Nama	-----	14

APPELLANT

THROUGH



**(M.ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT**



**(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT**



**(ASAD MAHMOOD)
ADVOCATE HIGH COURT**

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

APPEAL NO. 166 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 174

Dated 06-2-2018

Ghulam Farooq IHC No. 2034/83,
Police Lines, Peshawar.

.....(Appellant)

VERSUS

1. The Provincial Police Officer, Peshawar.
2. The Capital City Police Officer, Peshawar.
3. The Superintendent of Police (SP) Traffic, Peshawar.
4. The Superintendent of Police (SP) HQs, Police Lines, Peshawar
5. The Appellate Board, through its Chairman, CPO, Peshawar

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 15.01.2018 PASSED BY APPELLATE BOARD WHEREBY THE PENALTY OF REMOVAL FROM SERVICE HAS BEEN MODIFIED AS COMPULSORILY RETIREMENT.

PRAYER:

Filed to-day
Registrar
6/2/18
THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 21.08.2017, 22.08.2017, 12.10.2017 AND 15.01.2018 MAY BE SET ASIDE AND THE APPELLANT MAY BE RE-INSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS APPROPRIATE MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant joined the police force in the year 1999/2000 and has good record as well as completed all trainings as per rank

requirements. The appellant was lastly performing his duties as officiating ASI/IHC in the police deptt.

2. That due to some unavoidable circumstances the appellant remained absent from duty w.e.f 24.05.17 to 05.07.17. The appellant was charge sheeted for that absence and finally the penalty of forfeiture of one year service was imposed upon appellant and the period of absence was treated as leave without pay, vide order dated 21.08.2017. **(Copies of Charge Sheet, Statement of Allegations, and Penalty order are attached as Annexure-A, B & C).**
3. That simultaneously another proceedings were completed against the appellant for absence w.e.f 10.07.15 to 25.11.2015, wherein the appellant was never associated with proceedings. Even charge sheet, show cause notice and personal hearing was not given to appellant, thus, the appellant remained undefended. However, on 22.08.2017, the following day another order was passed against appellant wherein penalty of removal from service was imposed on appellant and period of absence was treated as without pay. **(Copy of order and exparte inquiry are attached as Annexure-D& E)**
4. That against both the order dated 21.08.2017 and 22.08.2017, the appellant preferred an appeal to CCPO on 21.09.2017 wherein he clearly mentioned that he was not remained absent and was on duty but despite of such plea the departmental appeal of appellant was rejected on 12.10.2017 without any justification. The appellant further preferred appeal to Appellate Board under Rule-11A of Police Rules 1975 on 18.10.2017 and worthy Appellate Board while partially accepting appeal modified penalty of Removal from Service into Compulsorily Retirement vide order dated 15.01.2018. **(Copies of appeal to CCPO, Order of CCPO, appeal to Appellate Board and order of Appellate Board are attached as Annexure-F,G,H,I)**
5. That now the appellant comes to this august Tribunal from following grounds amongst others.

GROUND:

- A) That order dated 21.08.2017 and 22.08.2017, 12.10.2017 and 15.01.2018 are against the law, facts norms of justice and material on record. Therefore not tenable.

- B) That absence of appellant was not willful but due to highly raised diabetes being a diabetic patient (400/450) and that plea was also accepted by Appellate Board but despite that appellant was firstly removed from service and then compulsorily Retired.
- C) That the appellant preferred departmental appeal against both orders dated 21.08.2017 and 22.08.2017 but appellate authority as well as Appellate Board passed the order against the order dated 22.10.2017 and not decided the appeal of appellant and against order dated 21.08.2017, thus the findings of appellate authority as well as Appellate Board are incompetent and defective.
- D) That the intervening period is already been treated leave without pay by authority, therefore, keeping in view the judgments of Superior Court, therefore, remained no grounds to impose other penalties of removal from service and compulsorily retirement from service.
- E) That appellant has been condemned unheard, especially, in respect of second order 22.08.2017 because for that allegations the appellant was neither charge sheeted nor associated with any inquiry and such the appellant was condemned unheard.
- F) That even chance of personal hearing was not provided to appellant by passing penalty order which also amounts to Audi Altrem Paltrem. Therefore, imposed order liable to be set aside.
- G) That order dated 21.08.2017 was passed by SP Traffic and order dated 22.08.2017 was imposed by SP HQ without showing the reasons as to whether which one is competent authority for appellant. Keeping in view the place of duty of appellant and this aspect makes the whole proceedings null and void.
- H) That appellant has not been treated in accordance with law and rules and has been deprived from rights of service in arbitrary manner which is not permissible in the eyes of law.
- I) That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may kindly be accepted as prayed for



APPELLANT

THROUGH



**(M.ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT**



**(TAIMUR ALI KHAN)
ADVOCATE HIGH COURT**



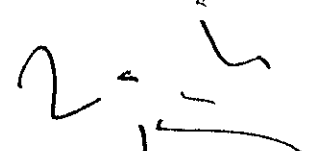
**(ASAD MAHMOOD)
ADVOCATE HIGH COURT**


A
5

CHARGE SHEET

1. WHEREAS I am satisfied that a formal enquiry as contemplated by Police Rules 1975 is necessary and expedient.
2. AND whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in Rule-3 of the aforesaid Rules.
3. Now therefore, as required by Rule 6 (1) (a) & (b) of the said Rules I, **YASIR AFRIDI**, Senior Superintendent of Police, Traffic, Peshawar hereby charge you **ASI Ghulam Froog No.83** under Rules 5 (4) of the Police Rules 1975 on the basis of following allegations:-
 - i). That you were found absent from duty w.e.from 24.05.2017 ^{to 5.7.2017 C 42.01} ~~approved~~ at large without leave/permission of the competent authority.
4. By doing this you have committed gross misconduct on your part.
5. AND I hereby direct you further under Rule 6 (I) (b) of the said Rules to put-in written defence within 07-days of the receipt of this Charge Sheet as to why the proposed action should not taken against you and also state whether you desire to be heard in person.
6. AND in case your reply is not received within the stipulated period to the enquiry officer, it shall be presumed that you have no defence to offer and in that case, ex-parte action will be taken against you.

اسی غلام فروغ نمبر 83
14:27 بجے 12⁰⁷/₁₇
0314-9053037


(YASIR AFRIDI) PSP
Senior Superintendent of Police,
Traffic, Peshawar.
(Competent Authority)

ATTESTED


2/10

B

(6)

DISCIPLINARY ACTION

1. I, **YASIR AFRIDI**, Senior Superintendent of Police, Traffic, Peshawar as competent authority, am of the opinion that **ASI Ghulam Farooq No.83** has rendered yourself liable to be proceeded against, as he committed the following acts/omission within the meaning of section 03 of Police Rules 1975.

SUMMARY OF ALLEGATIONS

to 5.7.2017 (42 days)

2. i). That he was found absent from duty w.e.from 24.05.2017 ~~and still on leave~~ without leave/permission of the competent authority.

3. For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, an Enquiry Committee comprising of the following officer(s) is constituted:-

a. Mr. Riaz Ahmad, SP/HQrs. Traffic, Peshawar.

b. _____

4. The enquiry committee/officer shall in accordance with the provision of the Police Rules 1975 provide reasonable opportunity of hearing to the accused officer/official and make recommendations as to punishment or any other appropriate action against the accused.

(YASIR AFRIDI) PSP
Senior Superintendent of Police,
Traffic, Peshawar.

(Competent Authority)

ATTESTED

1-5-2017 2/10

لوٹو پیام نسبت و سہ ماہی اور اس کے بعد سے

C
7

ORDER

This is an order on the departmental enquiry initiated against ASI Ghulam Farooq No.83 for absenting himself from duty w.e.from 24.05.2017 to 05.07.2017 (total 42-days) without leave/permission of the competent authority. He was therefore, charge sheeted and Mr. Riaz Ahmad, SP/Hqrs. Traffic was nominated as enquiry officer.

During the enquiry proceedings, the accused official stated that he was ill and produced medical certificates in support of his absence which was sent to the concerned hospital for verification. However, the Hospital Director, LRH (MTI) vide his letter No.22792/E-G/LRH; dated 09.08.2017 returned all the medical certificates with the remarks that all of them are fake. The enquiry officer in his findings therefore, recommended the accused official for suitable punishment for willfully absenting himself from duty and producing fake documents.

Keeping in view recommendation of the Enquiry Officer, the accused ASI Ghulam Farooq No.83 is therefore, awarded minor punishment of forfeiture of one year approved service under the Khyber Pakhtunkhwa Police Rules 1975. His absence period of 42 days is treated as leave without pay. His pay has been released.

24 L

(YASIR AFRIDI)-PSP
Senior Superintendent of Police,
Traffic, Peshawar.

No. 472-46/PA, Dated Peshawar the 21/08/2017.

Copies for information and necessary action to:-

1. DSP/Hqrs. Traffic, Peshawar.
2. Accountant
3. OSI
4. EC
5. SRC (along-with complete enquiry file consisting of 20 pages)

ATTESTED
[Signature]

ORDER

✓
No. 111-a-D
76

8

This office order relates to the disposal of formal departmental enquiry against Constable Ghulam Farooq No.2034/83-T of Capital City Police Peshawar on the allegations that he while posted at Police Lines, Peshawar absented himself from lawful duty w.e.f 10.07.2015 to 25.11.2015 (04-months & 15-days) without taking permission or leave.

In this regard, he was issued charge sheet and summary of allegations. SDPO Rural was appointed as Enquiry Officer. He conducted the enquiry and submitted his report that defaulter official did not attend the enquiry proceedings. The E.O further recommended major punishment for the defaulter official vide Enquiry Report No.718/S dated 07.03.2017.

Upon the finding of Enquiry Officer, he was issued final show cause notice & delivered to him on home address through local Police PS Badaber but he failed to submit reply of the said notice or appear before this office as yet in-spite of repeated summons/parwanas.

Note: On 12.06.2017, the MM Traffic Line has reported that the alleged official again absent from duty from 24.05.2017 till date. Moreover, a written parwana was again sent to Traffic Muharrir, which received by MM on 08.08.2017 but the delinquent official failed to appear as yet. Beside this, a letter was also addressed to SSP-Traffic vide this office letter No.2787/PA dated 14.06.2017.

In the light of recommendations of E.O & other material available on record, the undersigned came to conclusion that the alleged official found guilty of prolong absence. Therefore, he is hereby removed from service under Police & Disciplinary Rules-1975 with immediate effect. Hence, the period he remained absent from 10.07.2015 to 25.11.2015 is treated without pay.

EMC-51

[Signature]
SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR

[Signature]

OB. NO. 3175 / Dated 22/8 /2017

No. 4165-22/PA/SP /dated Peshawar the 22/8 /2017

Copy of above is forwarded for information & n/action to:

- ✓ Capital City Police Officer, Peshawar.
- ✓ SSP Traffic, Peshawar
- ✓ DSP/HQrs, Peshawar.
- ✓ Pay Office, OASI, CRC & FMC along-with complete departmental file.
- ✓ Officials concerned.

[Handwritten signature]

ATTESTED
[Signature]

From: The Sub-Divisional Police Officer,
Rural Peshawar.

To: The Superintendent of Police,
Headquarters, Peshawar.

Subject: **DISCIPLINARY ACTION AGAINST CONSTABLE GHULAM FAROOQ NO. 2034 OF POLICE LINES, PESHAWAR.**

Kindly refer to your office No. 101/E-PA dated 30.03.2016 on the subject cited above.

ALLEGATIONS:

Constable Ghulam Farooq No.2034 while posted in police lines, Peshawar was absent from the lawful duty without taking any leave or permission from his senior officers vide DD No. 15 dated 10.07.2015 to 25.11.2015 DD No. 46 (total 04 months & 15 days). In this regard, he was issued charge sheet and statement of allegations by the worthy SP Headquarters, Peshawar and the undersigned was appointed as E.O to scrutinize the conduct of the said official.

PROCEEDINGS:

Accordingly the alleged FC was called several times through this office parvanas No.656/S dated 08.03.2017 and No. 494/S dated 22.02.2017 to attend the office of the undersigned but in vain. However, the alleged FC has been transferred to Traffic Police.

FINDINGS/RECOMMENDATIONS:

During the course of enquiry conducted so far, I am of the opinion that the alleged constable Ghulam Farooq No. 2034 may kindly ^{be} awarded the major punishment on ^{the} grounds of ex-parte decision, if approved please.

Submitted for your kind orders.

No. 718 /DSP-Rural

Dated 17/03/2017

Enc(27)

[Signature]
ENQUIRY OFFICER
SUB-DIVISIONAL POLICE OFFICER
RURAL PESHAWAR

*Issue Final
show comm
notice*

Bashir

*SP Men
2013*

ATTESTED

(27)

عدالت عالیہ سی سی پی صاحب لہنوار

F A

(10)

137-UB DSP/L
21/09/2017

No

21/8/2017	942466	PA	①
22/8/2017	465-72	PA	②

Dy. No. 297
Dt. 19.9.2017
encl.

حالیہ میں ایس دوڑوں احکامات کے متعلق کیجانی ہے جس

① سپریم کورٹ نے جاری کیے
② سپریم کورٹ نے جاری کیے

DSP. Legal.

① یہ کہ دوڑوں جاریہ کو دیکھا جائے تو فرق ظاہر ہو جائے گا

ایک حکم میں غیر حاضر کا کسے کو بھیجی بغیر تنخواہ کے
متعلق فیہ یہ حکم ہے

FM Comments PI

[Signature]

② دوڑے حکم پر فکرت سے علوانگی کے ساتھ غیر حاضر پر پینڈ (عم)

کو بھیجی بغیر تنخواہ کا حکم صادر ہونا

FMC

put up record

③ یہ کہ میں غیر حاضر رہا۔ مگر حاضر کر کے اچھی ٹک ڈیوٹی پر تھمتا گیا

اور احسن طریقہ سے ڈیوٹی سرانجام دی

21/9/17

④ دوڑوں قطعاً مسابقتی طور پر جاریہ کا ذکر ہے

حقیقت میں ڈیوٹی دیتا ہے

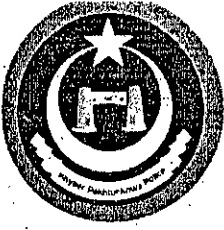
⑤ یہ کہ میں انٹرمیڈیٹ پاس شدہ ہوں

⑥ تقریباً یافتہ اور ڈیوٹی کا مکمل ہوں

میرا عمری اور دوران الہی ہے روزگار کو دیکھ کر احکامات کو مسترد
کر کے نوکری پر بحال دینا ہے تاکہ حکم جاری ہو سکا جاوے
دوڑوں حکم میں یہ ایک ہے۔

ATTESTED

03149053037



9
OFFICE OF THE
CAPITAL CITY POLICE OFFICER,
PESHAWAR

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

ORDER

This order will dispose off departmental appeal preferred by ex-IHC Ghulam Farooq No. 2034/83 who was awarded the major punishment of **Dismissal** from service under P.R 1975 vide OB No. 3175 dated 22.8.2017 by SP-HQRs: Peshawar.

2 The allegations levelled against him were that he while posted at Police Lines Peshawar absented himself from duty w.e.f 10.7.2015 to 25.11.2015 (4-months & 15-days)

3 Proper departmental proceedings were initiated against him and Mr. Granullah Khan, SDPO-Rural, Peshawar was appointed as enquiry officer. The appellant failed to appear before the E.O. The enquiry officer found him guilty of the allegations levelled against him. On receipt of the findings of the enquiry officer, the SP-HQRs: Peshawar issued him ESCN but he failed to submit his written reply within stipulated period, as such the Competent Authority awarded him the above major punishment.

4 The relevant record has been perused along with his explanation and also heard him in O.R on 11.10.2017. The enquiry papers were perused in detail. He was provided opportunity to defend himself but he failed to offer any plausible explanation in his favour. The allegations leveled against him stand proved. There is no need to interfere in the order passed by SP-HQRs: Peshawar, therefore, the appeal is **rejected/filed**.

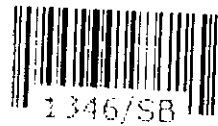
12
(MUHAMMAD TAHIR) PSP
CAPITAL CITY POLICE OFFICER,
12/10 PESHAWAR

No. 1332-37 /PA dated Peshawar the 12/10 /2017.

Copies for information and n/a to the:-

1. SP/^{HO}~~Chief~~: Peshawar.
2. PO/OASI/CRC (along with complete F.M) for making necessary entry in his S.Roll.
3. FMC encl: Enquiry Rtr.
4. Official concerned.

ATTESTED
12



انٹرنیشنل آف پولیس چیف کنفرانس 2013/14

درخواست برادر رحم اپیل / درخواست

صاحب عالی!

گرامش کھیر سائیل کو صاحب - MP صاحبہ ہدیہ گزارنے پر جو
 غیر طاری نوکریا سے برخواست کیا ہے۔ سائیل نے غیر طاری
 تصدقاً محمد انیس کی ہے بلکہ سائیل 2013/14 سے شرگر
 کے عارضہ میں مبتلا ہے۔ اور سائیل کو کافی متاثر کیا ہے۔
 اکثر ادقات سائیل کا شرگر 400/450 رہتا ہے۔ جس کی
 وجہ سے سائیل کو آئیئر لیسل ڈیوٹی سرانجام دینے میں
 کافی مشکلات پیش آتی ہے۔ چونکہ پولیس کی نوکری
 سے ملنے والی نوکری پر سائیل اپنا اور فیملی کا گزارہ
 کرنا تھا۔ اور اب نوکریا نہ ہونے کی وجہ سے سائیل
 تنگ دست ہو گیا ہے اور مشکلات نے گھیرا ہے۔

لہذا درخواست اسٹیمپ عادیہ سائیل کی، رحم درخواست
 پر ہمدردانہ طور پر ماکر حال کرنے سے مشورہ فرمائیں
 سائیل زندگی بھر دعا کر رہے گا۔

موند 18/10/17

ATTESTED

العاہی

Siddh S

87

آپ کا جملہ سائیل (H.C) علام فاروق عم 2034/83
 0314-9053037

Office of the PPO KPK, Peshawar
 (Secret Branch)
 Dy. No. of 3113/17
 Dated: 19-10-2017



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

No. S/ 299 /18, dated Peshawar the 15/01/2018.

ORDER

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by Ex-IHC Ghulam Farooq No. 2034/83. The petitioner was removed from service by SP/HQrs: Peshawar vide OB No. 3175, dated 22.08.2017 on the charge of absence from duty for 04 months and 15 days.

Meeting of Appellate Board was held on 28.12.2017 wherein petitioner was heard in person. During hearing petitioner contended that his absence was not deliberate but he is suffering from diabetic.

Perusal of record revealed that Ghulam Farooq No. 2034/83 Ex-IHC was dismissed from service on the charges of willful and deliberate absence from duty for 04 months & 15 days vide impugned order dated 22.08.2017 of SP/HQrs: Peshawar. His departmental appeal was rejected by CCPO Peshawar vide order dated 12.10.2017.

There is long service of 17 years, 01 months and 08 days at the credit of petitioner, therefore, in view of his long service, the Board decided that the punishment of removal from service is hereby converted into compulsory retirement from service.

This order is issued with the approval by the Competent Authority.

(AHS. N. SAIFULLAH)
AIG Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. S/ 300-306 /18.

Copy of the above is forwarded to the:

1. Capital City Police Officer, Peshawar.
2. Supdt: of Police, HQrs, Peshawar.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

ATTESTED

VAKALAT NAMA

NO. _____/20

IN THE COURT OF Service Tribunal Peshawar

GULAM FAROOQ (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

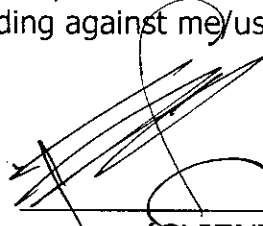
POLICE DEPARTMENT (Respondent)
(Defendant)

I/~~We~~, Gulam Farooq Petitioner

Do hereby appoint and constitute **M. Asif Yousafzai, Advocate Supreme Court Peshawar**, 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.

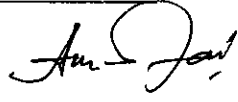
I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding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

Dated _____/20



(CLIENT)

ACCEPTED


M. ASIF YOUSAFZAI
*Advocate Supreme Court
Peshawar.*

Taimur Ali Khan
Advocate High Court

Syed Nauman Ali Bukhari
Advocate

OFFICE:
Room # FR-8, 4th Floor,
Bilour Plaza, Peshawar,
Cantt: Peshawar
Cell: (0333-9103240)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL NO. 166/2018

IHC Ghulam Farooq No. 2034/83 Police Line Peshawar..... Appellant

VERSUS

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. Capital City Police Officer, Peshawar.
3. Senior Superintendent of Police, Traffic, Peshawar
4. Superintendent of Police, HQs: Police Line, Peshawar..... Respondents

Reply on behalf of Respondents No. 1,2,3&4.

Respectfully shewth:.

PRELIMINARY OBJECTIONS.

1. That the appeal is badly time barred.
2. That the appeal is bad for mis-joinder of unnecessary and non-joinder of necessary parties.
3. That the appellant has not come to this Hon'able Tribunal with clean hands.
4. That the appellant has no cause of action.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appellant has concealed the material facts from Honorable Tribunal.
7. That this Hon'able Tribunal has no jurisdiction to entertain the appeal.

Facts:-

1. Para No. 1 pertains to record, hence needs no comments.
2. The appellant remained absent from his lawful duty w.e.f 24.05.2017 to 05.07.2017 without taking prior permission/leave from the competent authority and the appellant has not provided any genuine reason for his long absentee. Therefore, the appellant IHC Ghulam Farooq was awarded minor punishment of forfeiture of one year approved service after conducting departmental enquiry under the Khyber Pakhtunkhwa Police Rules 1975 (Copy of the SSP Traffic order as annexure "A")
3. The appellant again remained absent from his lawful duty w.e.f 10.07.2017 to 25.11.2017 for (04 months & 15-days) without prior permission from the competent authority. In this regard departmental enquiry was initiated and proper charge sheet, summary of allegation was issued to the appellant. The appellant did not attend the legal proceedings of the enquiry. To conclude the enquiry, the competent authority issued final show cause notice and delivered to him at his home address through local police (P.S Badaber) but the appellant failed to submit his reply of the said notice. Keeping in view of the above facts the appellant was found guilty of the charges. Therefore ex-parte action was taken against him and he was removed from service under

Police & Disciplinary Rule 1975 (copy of charge sheet, final Show notice and removal order as annexed "B", "C" & "D" respectively).

4. As mentioned above that proper departmental proceedings were initiated against the appellant but he failed to provide any genuine reason. The appellant filed departmental appeal which was thoroughly examined and filed/rejected by the appellate authority vide order No. 1332-37/PA dated 12.10.2017. The appellant then filed mercy appeal to the W/IGP KPK for reinstatement in service. Where his petition was sympathetically considered and the punishment of removal from service was converted into compulsory retirement. (Copy of W/CCPO and AIG Establishment office order as annexed "E" & "F").
5. Incorrect, the appellant has no cause of action to file instant service appeal.

GROUND:-

- A. Incorrect. The orders are just, legal and have been passed in accordance with law.
- B. Para is incorrect. During the course of enquiry medical prescriptions/certificates produced by the appellant was verified from the concerned Hospital, which were reported to be fake and bogus. (Copy of the letter LRH Director as annexed "G". Therefore, punishment was awarded in accordance to law.
- C. Incorrect, order passed by the appellate authority is in accordance in law/rules.
- D. Incorrect. The appellant treated as per law/rules.
- E. Para is incorrect proper departmental enquiry was initiated into the charges and during the course of enquiry opportunity of self defense was granted but he willfully loss the same and failed to associate with the enquiry proceedings.
- F. Incorrect. The appellant was given proper opportunity of personal hearing and defence before passing the punishment orders.
- G. Incorrect. The punishment orders were passed by the competent authority is legal and in accordance with law/rules.
- H. Incorrect, the appellant was treated in accordance with law/rules.
- I. The replying respondents may also be allowed to advance additional grounds at the time of arguments.

PRAYER:-

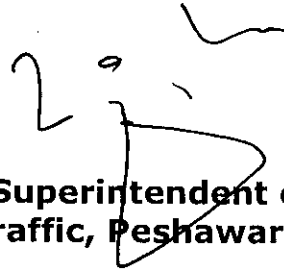
It is, therefore, most humbly prayed that in light of above submissions, appeal of the appellant may very graciously be dismissed with cost.



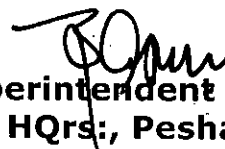
**Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.**



**Capital City Police Officer,
Peshawar.**



**Senior Superintendent of Police
Traffic, Peshawar.**



**Superintendent of Police
HQs, Peshawar.**

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Service Appeal No.166/2018.

IHC Ghulam Farooq No.2034/83, Police Line PeshawarAppellant.

VERSUS

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Capital City Police Officer, Peshawar .
3. Senior Superintendent of Police, Traffic, Peshawar.
4. SP HQrs Police Line Peshawar.....Respondents.

AFFIDAVIT

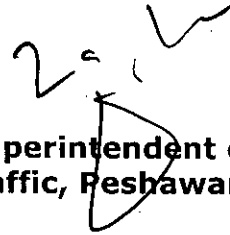
We respondents No. 1 ,2,3 &4 do hereby solemnly affirm and declare that the contents of the written reply are true and correct to the best of our knowledge and belief and nothing has concealed/kept secret from this Honorable Tribunal.



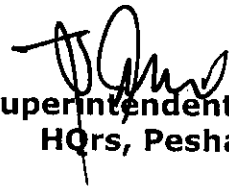
**Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.**



**Capital City Police Officer,
Peshawar.**



**Senior Superintendent of Police,
Traffic, Peshawar.**



**Superintendent of Police,
HQrs, Peshawar.**

(A)

ORDER

This is an order on the departmental enquiry initiated against ASI Ghulam Farooq No.83 for absentsing himself from duty w.e.from 24.05.2017 to 05.07.2017 (total days) without leave/permission of the competent authority. He was therefore, charge sheeted and Mr. Riaz Ahmad, SP/Hqrs. Traffic was nominated as enquiry officer.

During the enquiry proceedings, the accused official stated that he was ill and produced medical certificates in support of his absence which was sent to the concerned hospital for verification. However, the Hospital Director, LRH (MTI) vide his letter No.2275 E-G/LRH, dated 09.08.2017 returned all the medical certificates with the remarks that all them are fake. The enquiry officer in his findings therefore, recommended the accused official for suitable punishment for willfully absentsing himself from duty and producing fake documents.

Keeping in view recommendation of the Enquiry Officer, the accused A Ghulam Farooq No.83 is therefore, awarded minor punishment of forfeiture of one year approved service under the Khyber Pakhtunkhwa Police Rules 1975. His absence period of days is treated as leave without pay. His pay has been released.

20
(YASIR AFRIDI) PSP
Senior Superintendent of Police,
Traffic, Peshawar.

No. 94246 /PA, Dated Peshawar the 21 / 08 / 2017.

Copies for information and necessary action to:-

1. DSP/Hqrs. Traffic, Peshawar.
2. Accountant
3. OSI
4. EC
5. SRC (along-with complete enquiry file consisting of 20 pages)

CHARGE SHEET

(B)

(13)

I, Superintendent of Police, Headquarters, Capital City Police Peshawar, as a competent authority, hereby, charge that Constable Ghulam Farooq No.2034 of Capital City Police Peshawar with the following irregularities.


"That you Constable Ghulam Farooq No.2034 while posted at Police Lines, Peshawar were absent from duty w.e.f. 10.07.2015 to 25.11.2015 (04-months & 15-days) without taking permission or leave. This amounts to gross misconduct on your part and is against the discipline of the force."

You are, therefore, required to submit your written defence within seven days of the receipt of this charge sheet to the Enquiry Officer committee, as the case may be.

Your written defence, if any, should reach the Enquiry Officer/Committee within the specified period, failing which it shall be presumed that have no defence to put in and in that case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person.

A statement of allegation is enclosed.


SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR

(C)

(5)
e

FINAL SHOW CAUSE NOTICE

I Superintendent of Police, Headquarters, Capital City Police Peshawar, as competent authority, under the provision of Police Disciplinary Rules 1975 do hereby serve upon you, Constable Ghulam Farooq No.2034 the final show cause notice.

The Enquiry Officer, SDPO Rural, after completion of departmental proceedings, has recommended you for major punishment for you Constable Ghulam Farooq No.2034 as the charges/allegations leveled against you in the charge sheet/statement of allegations.

And whereas, the undersigned is satisfied that you Constable Ghulam Farooq No.2034 deserve the punishment in the light of the above said enquiry reports.

I, competent authority, have decided to impose upon you the penalty of minor/major punishment under Police Disciplinary Rules 1975.

1. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
2. If no reply to this notice is received within 7 days of its receipt, in normal course of circumstances, it shall, be presumed that you have no defence to put in and in that case as ex-parte action shall be taken against you.

CSAN
SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR

No. 111/9 /PA, SP/HQrs: dated Peshawar the 28/3 /2017.

Copy to official concerned

(D)

✓

No. 111-e
76

ORDER

This office order relates to the disposal of formal departmental enquiry against Constable Ghulam Farooq No.2034/83-T of Capital City Police Peshawar on the allegations that he while posted at Police Lines, Peshawar absented himself from lawful duty w.e.f 10.07.2015 to 25.11.2015 (04-months & 15-days) without taking permission or leave.

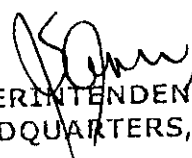
In this regard, he was issued charge sheet and summary of allegations. SDPO Rural was appointed as Enquiry Officer. He conducted the enquiry and submitted his report that defaulter official did not attend the enquiry proceedings. The E.O further recommended major punishment for the defaulter official vide Enquiry Report No.718/S dated 07.03.2017.

Upon the finding of Enquiry Officer, he was issued final show cause notice & delivered to him on home address through local Police PS Badaber but he failed to submit reply of the said notice or appear before this office as yet in spite of repeated summons/parwanas.

Note: On 12.06.2017, the MM Traffic Line has reported that the alleged official again absent from duty from 24.05.2017 till date. Moreover, a written parwana was again sent to Traffic Muharrir, which received by MM on 08.08.2017 but the delinquent official failed to appear as yet. Beside this, a letter was also addressed to SSP-Traffic vide this office letter-No.2787/PA dated 14.06.2017.

In the light of recommendations of E.O & other material available on record, the undersigned came to conclusion that the alleged official found guilty of prolong absence. Therefore, he is hereby removed from service under Police & Disciplinary Rules-1975 with immediate effect. Hence, the period he remained absent from 10.07.2015 to 25.11.2015 is treated without pay.

EMC-51

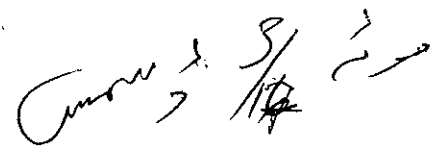

SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR

OB. NO. 3175 / Dated 22/8 /2017

No. 4165-22/PA/SP /dated Peshawar the 22/8 /2017

Copy of above is forwarded for information & n/action to:

- ✓ Capital City Police Officer, Peshawar.
- ✓ SSP Traffic, Peshawar
- ✓ DSP/HQrs, Peshawar.
- ✓ Pay Officer, OASI, CRC & FMC along-with complete departmental file.
- ✓ Officials concerned.





E

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

Phone No. 091-9210989

Fax No. 091-9212597


ORDER

This order will dispose off departmental appeal preferred by ex-IHC **Ghulam Farooq No. 2034/83** who was awarded the major punishment of **Dismissal** from service under P.R 1975 vide OB No. 3175 dated 22.8.2017 by SP-HQRs: Peshawar.

2 The allegations levelled against him were that he while posted at Police Lines Peshawar absented himself from duty w.e.f 10.7.2015 to 25.11.2015 (**4-months & 15-days**)

3 Proper departmental proceedings were initiated against him and Mr. Granullah Khan, SDPO-Rural, Peshawar was appointed as enquiry officer. The appellant failed to appear before the E.O. The enquiry officer found him guilty of the allegations levelled against him. On receipt of the findings of the enquiry officer, the SP-HQRs: Peshawar issued him FSCN but he failed to submit his written reply within stipulated period, as such the Competent Authority awarded him the above major punishment.

4 The relevant record has been perused along with his explanation and also heard him in O.R on 11.10.2017. The enquiry papers were perused in detail. He was provided opportunity to defend himself but he failed to offer any plausible explanation in his favour. The allegations leveled against him stand proved. There is no need to interfere in the order passed by SP-HQRs: Peshawar, therefore, the appeal is **rejected/filed**.


(MUHAMMAD TAIHIR) PSP
CAPITAL CITY POLICE OFFICER,
12/10 PESHAWAR

No. 1332-37 /PA dated Peshawar the 12/10 /2017.

Copies for information and n/a to the:-

1. SP/^{HO}~~Genl~~: Peshawar.
2. PO/OASI/CRC (along with complete F.M) for making necessary entry in his S.Roll.
3. ✓ FMC encl. Enquiry File
4. Official concerned.

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

No. S/ 299 /18, dated Peshawar the 15/10/2018

ORDER

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by Ex-IHC Ghulam Farooq No. 2034/83. The petitioner was removed from service by SP/HQrs: Peshawar vide OB No. 3175, dated 22.08.2017 on the charge of absence from duty for 04 months and 15 days.

Meeting of Appellate Board was held on 28.12.2017 wherein petitioner was heard in person. During hearing petitioner contended that his absence was not deliberate but he is suffering from diabetic.

Perusal of record revealed that Ghulam Farooq No. 2034/83 Ex-IHC was dismissed from service on the charges of willful and deliberate absence from duty for 04 months & 15 days vide impugned order dated 22.08.2017 of SP/HQrs: Peshawar. His departmental appeal was rejected by CCPO Peshawar vide order dated 12.10.2017.

There is long service of 17 years, 01 months and 08 days at the credit of petitioner, therefore, in view of his long service, the Board decided that the punishment of removal from service is hereby converted into compulsory retirement from service.

This order is issued with the approval by the Competent Authority.

(AHSAN SAIFULLAH)
AIC Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

No. S/ 300-306 /18.

Copy of the above is forwarded to the:

1. Capital City Police Officer, Peshawar.
2. Supdt: of Police, HQrs, Peshawar.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

No. 1159 /



Dated 08 / 08 / 2017

To,

G

The Hospital Director
MTI/LRH, Peshawar.

Subject: - **REPLY OF VERIFICATION OF MEDICAL REST 06 WEEKS.**

Sir:

Reference LRH/MTI Dairy No. 10462 dated. 17/07/2017, on the subject cited above. It is submitted that the same was not verified by Incharge orthopedic "B" LRH/MTI and Incharge Purchi counter. The attached documents are declared **FAKE.**

Encl: Attached

**MANAGER OPD & AMBULATORY SERVICES/RMO
Lady Reading Hospital Peshawar, M.T.I**

[Handwritten signature and scribble]

BEFORE THE KPK, SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 166/2018

Ghulam Farooq

VS

Police Deptt:

.....
REJOINDER ON BEHALF OF APPELLANT
.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

(1-7) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Para-1 of the appeal is admitted correct by the respondent deptt: as service record is already in the custody of respondent deptt:.
- 2 Incorrect. While para-2 of the appeal is correct as mentioned in the main appeal of the appellant. Moreover, according rules and superior court judgment the medical prescription must be examined through medical board but the department failed to follow said procedure which is against the law and rules. Further it is added that when the deptt: regularized the absence

period of the appellant then there was no ground remained to punish appellant.

- 3 Incorrect. While para-3 of the appeal is correct as mentioned in the main appeal of the appellant.
- 4 Incorrect. While para-4 of the appeal is correct as mentioned in the main appeal of the appellant.
- 5 Incorrect. While para-5 of the appeal is correct as mentioned in the main appeal of the appellant.

GROUND:

- A) Incorrect. The orders of the respondents are against the law, rules and norms of justice therefore not tenable and liable to be set aside.
- B) Incorrect. While para-B of the appeal is correct as mentioned in the main appeal of the appellant.
- C) Incorrect. Incorrect. While para-C of the appeal is correct as mentioned in the main appeal of the appellant.
- D) Incorrect. Incorrect. While para-D of the appeal is correct as mentioned in the main appeal of the appellant.
- E) Incorrect. Incorrect. While para-E of the appeal is correct as mentioned in the main appeal of the appellant.
- F) Incorrect. Incorrect. While para-F of the appeal is correct as mentioned in the main appeal of the appellant.
- G) Incorrect. Incorrect. While para-G of the appeal is correct as mentioned in the main appeal of the appellant.
- H) Incorrect. Incorrect. While para-H of the appeal is correct as mentioned in the main appeal of the appellant.

I) Legal.

It is, therefore, most humbly prayed that the appeal of appellant may kindly be accepted as prayed for.

APPELLANT

Through:

M. Asif Yousafzai
M. ASIF YOUSAFZAI

Syed Noman Ali Bukhari
SYED NOMAN ALI BUKHARI
ADVOCATE, HIGH COURT.

AFFIDAVIT

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.

[Signature]
DEPONENT



KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 267 /ST Dated 13 / 02 / 2019


To

The Provincial Police Officer,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: - JUDGMENT IN APPEAL NO. 166/2018, MR. GHULAM FAROOQ.

I am directed to forward herewith a certified copy of Judgement dated 11.02.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.