

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

Service Appeal No. 1097/2019

Date of Institution ... 27.08.2019

Date of Decision... 22.11.2022

Muhammad Tahir, Constable No. 442 Police Line, District Nowshera.

... (Appellant)

VERSUS

The Provincial Police Officer, Government of Khyber Pakhtunkhwa and 02 others.

... (Respondents)

MR. RIZWANULLAH,
Advocate

For appellant.

MR. MUHAMMAD RIAZ KHAN PAINDAKHEL,
Assistant Advocate General

For respondents.

SALAH-UD-DIN
MIAN MUHAMMAD

MEMBER (JUDICIAL)
MEMBER (EXECUTIVE)

JUDGMENT:

SALAH-UD-DIN, MEMBER:- Through the instant service appeal, the appellant has invoked jurisdiction of this Tribunal with the prayer copied as below:-

"By accepting this appeal, the impugned orders of the respondents dated 27.07.2010, 21.06.2019 & 31.07.2019 may very graciously be set-aside and the disputed increments of the



appellant may kindly be restored from the date of stoppage.

Any other relief deemed appropriate in the circumstances of the case, not specifically asked for, may also be granted to the appellant.

2. As per averments in the appeal, the appellant was appointed as Constable on 31.01.2002 and was receiving equal pay as were received by his colleague. It was in the month of January 2019 that the appellant received less salary than his batch-mates, therefore, he visited the Establishment Branch on 11.02.2019 for query and came to know that vide order dated 27.07.2010, he has been awarded minor penalty of stoppage of two increments with cumulative effect on account of his absence from duty. The appellant challenged the aforementioned penalty through filing of departmental appeal, which was rejected. The appellant then filed revision petition before the Provincial Police Officer Khyber Pakhtunkhwa Peshawar, which was also declined, hence the instant service appeal.


3. Learned counsel for the appellant has addressed his arguments supporting the grounds agitated by the appellant in his service appeal. On the other hand, learned Assistant Advocate General has controverted the arguments of learned counsel for the appellant and has supported the comments submitted by the respondents. He also submitted an application that as the original record has now been found, therefore, the

same may be perused by the Tribunal as well as learned counsel for the appellant.

4. A perusal of the record would show that the appellant has annexed copy of character role of the appellant as annexure-B with his appeal, which would show that as the appellant had remained absent from special duty on 25.07.2010, therefore, vide order bearing OB No. 816 dated 27.07.2010, he was awarded minor punishment of stoppage of two increments with cumulative effect. The genuineness of copy of character role, annexed by the appellant as annexure-A with his appeal has not been specifically questioned by the respondents in their comments. It is the contention of the appellant that no show-cause notice was issued to him regarding his alleged absence from duty on 25.07.2010 and the impugned order dated 27.07.2010 was passed at his back without giving him any opportunity of self defence as well as personal hearing. The impugned order dated 27.07.2010 was though incorporated in character role of the appellant, however no formal order of the competent Authority could be produced by the respondents regarding the penalty awarded to the appellant. The excuse raised by the respondents in this respect is to the effect that the record had been destroyed due to devastating flood. If the plea of the respondents is admitted as correct, then they were required to show as to whether any step had been taken by them for reconstruction of the record. The respondents have, however



badly failed to produce any documentary proof, which could show that any correspondence was made for reconstruction of the record allegedly destroyed due to flood. Learned Assistant Advocate General has though submitted an application for perusal of the record brought by representative of the respondents namely Mr. Muhammad Fayaz Head Constable, however on our query, the aforementioned representative of the respondents has categorically admitted that the record brought by him does not pertain to any departmental proceedings being taken by the competent Authority regarding allegations of absence of the appellant.

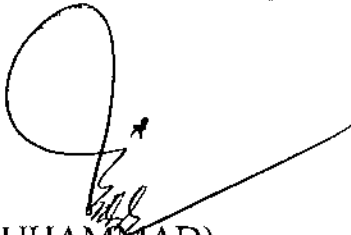


5. The alleged absence of the appellant from duty was a factual controversy requiring conducting of a regular inquiry, however the respondents have failed to prove that any inquiry was conducted against the appellant regarding his alleged absence from duty on 25.07.2010. The appellant was allegedly absent from duty for only one day i.e 25.07.2010, who was awarded penalty on 27.07.2010, which fact also indicates that no regular inquiry was conducted in the matter. The principle of natural justice enshrined in the maxim "*audi alteram partem*" is one of the most important principle and its violation is always considered enough to vitiate even most solemn proceedings. Worthy apex court in its judgment reported as 2008 SCMR 934 has held that where adverse action is contemplated to be taken against the person/persons, he/they

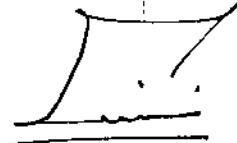
has/have a right to defend such action, notwithstanding the fact that the statute governing their rights does not contain provision of the principle of natural justice and even in absence thereof it is to be read/considered as part of such statute in the interest of justice. Moreover, it is strange enough that the appellant was awarded minor penalty on 27.07.2010 but the same was implemented after considerable period in the year 2019.

6. In view of the above discussion, the impugned orders are set-aside and the appeal in hand is allowed as prayed for. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
22.11.2022



(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

ORDER
22.11.2022

Appellant alongwith his counsel present. Mr. Muhammad Fayaz, Head Constable alongwith Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present. Arguments heard and record perused.

Vide our detailed judgment of today, separately placed on file, the impugned orders are set-aside and the appeal in hand is allowed as prayed for. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
22.11.2022



(Mian Muhammad)
Member (Executive)





(Salah-Ud-Din)
Member (Judicial)

27th May, 2022

Clerk of the counsel present. Mr. Naseerud Din Shah,
Asstt. AG for respondents present.

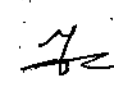
Arguments could not be heard due to general strike of
the bar. Adjourned. To come up for arguments on 08.08.2022
before D.B.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

8-8-2022

Due to the Public holiday the case is
adjourned to 22-11-2022


Reader

24.06.2021

None present on behalf of appellant.

Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Notice be issued to appellant/counsel for 27.10.2021 for hearing, before D.B.



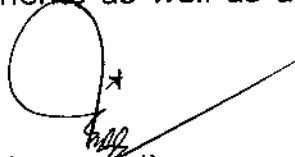
(Rozina Rehman)
Member (J)



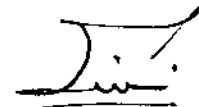
Chairman

27.10.2021

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents. present and sought time for submission of reply/comments. Adjourned. To come up for submission of reply/comments as well as arguments on 28.02.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

28.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 27.05.2022 for the same as before.



Reader

21.10.2020

Junior to counsel for the petitioner and Addl. AG for the respondents present.

The Bar is observing general strike today, therefore, the matter is adjourned to 12.01.2021 for hearing before the D.B.


(Mian Muhammad)
Member


Chairman

12.01.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak learned Addl. AG for respondents present.

Due to COVID-19, the case is adjourned for the same on 26.03.2021 before D.B.


READER

26.03.2021

Appellant in person and Mr. Noor Zaman, DA along with Muhammad Haroon, Assistant for the respondents present.

The Worthy Chairman is on leave, therefore, case is adjourned to 24.06.2021 for hearing before the D.B.


(Atiq-ur-Rehman Wazir)
Member(E)

06.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 29.06.2020 for the same. To come up for the same as before S.B.


Reader

29.06.2020

The Worthy Chairman is on leave, therefore, the case is adjourned. To come up on 18.08.2020 before S.B.

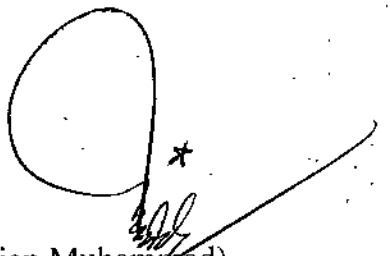

Reader

18.08.2020-

Miss. Roaida Khan, Advocate on behalf of counsel for the appellant present. Mr. Ziaullah, DDA alongwith Mr. Fayaz, H.C for respondents present.

Written reply on behalf of respondents submitted which is placed on file.


To come up for rejoinder and arguments on 21.10.2020 before D.B.


(Mian Muhammad)
Member(E)

09.12.2019 Appellant in person and Addl. AG for the respondents present.

Representatives of the respondents seek time to furnish reply/comments. Adjourned to 21.01.2020 on which date the requisite reply/comments shall positively be submitted.

Chairman



21.01.2020 Junior to counsel for the appellant and Addl. AG for the respondents present.

Learned AAG seeks time to contact the respondents and furnish the requisite reply/comments. Adjourned to 26.02.2020 on which date reply/comments shall positively be furnished.

Chairman



26.02.2020 Junior to counsel for the appellant present. Nemo for respondents. Fresh notices be issued to them. To come up for written reply/comments on 06.04.2020 before S.B.

(Hussain Shah)
Member



318/19

07.10.2019

Counsel for the appellant present.

Learned counsel contended that the appellant was dismissed from service through order dated 27.03.2010 without any departmental proceedings against him. In the said manner the legal requirements were neither fulfilled nor the appellant was provided with any opportunity to put-forth his defence. Further referred to judgment of this Tribunal passed in Service Appeal No. 1478/2010 and stated that similarly placed officials were granted relief, therefore, the appellant was entitled for the same treatment. Explaining the delay in submission of departmental appeal by the appellant, it was argued that the impugned order was void ab-initio, therefore, the period of limitation was not to run against him.

In view of arguments of learned counsel, instant appeal is admitted for regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 09.12.2019 before S.B.

Appellant Directed
Security & Process Fee

25/10/19


Chairman

09.10.2019

Counsel for the appellant present.

Contends that an order was passed on 27.07.2010 whereby the appellant was imposed upon minor penalty of stoppage of two increments with accumulative effect. The order was passed at the back of appellant without providing him any opportunity of defending himself. Besides, no proceedings under the rules were taken before passing of the impugned order nor it was conveyed to the appellant. It came to knowledge of appellant for the first time when the increments were not included in the salary of appellant in the month of January, 2019. Thereafter, a departmental appeal was preferred after obtaining a copy of impugned order. The same was turned down on 21.06.2019, hence the present appeal.

In view of the available record and arguments of learned counsel, instant appeal is admitted to regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 09.12.2019 before S.B.

Appellant Deposited
Security & Process Fee

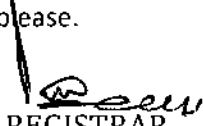


Chairman

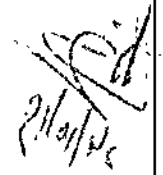
Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1097/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/08/2019	<p>The appeal of Mr. Muhammad Tahir presented today by Mr. Rizwanullah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	28/08/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>09/10/19</u></p> <p style="text-align: right;"> CHAIRMAN</p>


21/08/19

BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 1097 /2019

1. Muhammad Tahir, Constable No. 442 Police Line, District Nowshera.

APPELLANT

VERSUS

1. The Provincial Police Officer, Government of Khyber Pakhtunkhwa & others.

RESPONDENTS

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S.No	Particulars	Annexure	Pages #
1	Service Appeal	—	1-07
2	Affidavit	—	8
3	Copy of Payroll	A	09-20
4	Copy of impugned order dated 27-07-2010	B	21
5	Copy of departmental appeal dated 11-06-2019	C	22-23
6	Copy of rejection order of departmental appeal dated 21-06-2019	D	24
7	Copy of revision petition dated 04-07-2019	E	25-27
8	Copy of rejection order dated 02-08-2019	F	28
9	Wakalatnama	—	—

Appellant

Through

Dated: 23-08-2019

Rizwanullah

Advocate High Court, Peshawar

**BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. 1097 /2019

1. Muhammad Tahir, Constable No. 442 Police Line, District Nowshera.

APPELLANT

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1205

Dated 27/8/2019

VERSUS

1. The Provincial Police Officer, Government of Khyber Pakhtunkhwa.
2. The Regional Police Officer, Mardan Region-I, Mardan.
3. The District Police officer, Nowshera.

RESPONDENTS

**APPEAL UNDER SECTION 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE
ORDER DATED 27-07-2010 PASSED BY
THE DISTRICT POLICE OFFICER,
NOWSHERA (RESPONDENT NO. 3)
WHEREBY THE APPELLANT WAS
AWARDED MINOR PENALTY OF
STOPPAGE OF TWO INCREMENTS
WITH ACCUMULATIVE EFFECT
AGAINST WHICH A DEPARTMENTAL
APPEAL WAS FILED WITH THE
REGIONAL POLICE OFFICER
(RESPONDENT NO. 2) ON 11-06-2019 BUT
THE SAME WAS REJECTED ON**

Filed to-day

Registrar

27/8/19

**21-06-2019. THEREAFTER, A REVISION
PETITION U/R 11-A OF THE KHYBER
PAKHTUNKHWA POLICE RULES, 1975
WAS FILED WITH THE PROVINCIAL
POLICE OFFICER, KHYBER
PAKHTUNKHWA (RESPONDENT NO. 1)
ON 04-07-2019 BUT IT WAS ALSO
REJECTED ON 26-07-2019.**

Prayer in Appeal

By accepting this appeal, the impugned orders of the respondents dated 27-07-2010, 21-06-2019 and 31-07-2019 may very graciously be set aside and the disputed increments of the appellant may kindly be restored from the date of stoppage

Any other relief deemed appropriate in the circumstances of the case, not specifically asked for, may also be granted to the appellant.

RESPECTFULLY SHEWETH,

Short facts giving rise to the present appeal are as under:-

1. That the appellant and Ijaz Ahmed joined the services of Police department in-capacity as Constables on 31-01-2002. They were receiving equal pay since November, 2018 but in the month of January, 2019, it was noticed that the appellant received less and meagre pay than his above colleague. There was difference between their basic pay which is reproduced as under: -

S. No	Name of official	Basic pay for January, 2019	Difference
1	Ijaz Ahmed Constable	19530/-	Nil
2	Muhammad Tahir Constable (Appellant)	18310	1220/-

(Copy of payroll is appended as Annex-A)

2. That thereafter, the appellant visited the concerned Establishment Branch on 11-02-2019 to know the cause of his less pay. But he was informed that he was awarded minor penalty of stoppage of two increments with accumulative effect on account of absence from special duty vide order dated 27-07-2010 and that the above was the outcome of the said order. He collected the said order through personal efforts on 09-06-2019 as the same was recorded in his **“Character Roll”** and no **“formal order”** whatsoever was passed nor any information was given to the appellant in this regard. Besides, neither any charge sheet alongwith statement of allegation was served on the appellant nor any regular inquiry was conducted against him. Similarly, no show cause notice was issued to him nor he was provided any opportunity of personal hearing to fulfil the requirement of fair trial.

(Copy of impugned order is appended as Annex-B)

3. That the appellant felt aggrieved by the said order, filed a departmental appeal (through proper channel) with the Regional Police officer, Mardan Region Mardan (respondent No.2) on 11-06-2019 but the same was rejected on 21-06-2019. He then filed revision petition u/r 11-A of the Khyber Pakhtunkhwa Police Rules, 1975 with the Provincial Police Officer, Khyber Pakhtunkhwa (respondent No. 1) on 04-07-2019 which also met the same fate on 26-07-2019 and copy thereof was sent to the respondent No. 2 to intimate the appellant who received it on 02-08-2019 and then forwarded the same to the respondent No. 3 for necessary action. The latter received the same on 05-08-2019 vide Diary No. 1446 and then informed the appellant accordingly.

(Copy of Departmental appeal, its rejection order, revision petition and its rejection order are appended as Annex-C, D, E and F respectively)

4. That the appellant now files this appeal before this Hon'ble Tribunal inter-alia on the following grounds within the statutory period of law.

GROUND OF APPEAL

- A. That respondents have not treated appellant in accordance with law, rules and policy on the subject and acted in violation of **Article 4 of the Constitution of Islamic Republic of Pakistan, 1973**. Therefore, the impugned orders are not sustainable in the eye of law.
- B. That the appellant was awarded minor penalty of stoppage of two increments with accumulative effect but he was not served with a charge sheet alongwith statement of allegations in order to explain his position regarding the so-called allegations if any levelled against him as required under **Rule 6 (1)(a) of the Khyber Pakhtunkhwa Police Rules, 1975 (Amended in 2014)**. But the Competent Authority failed to do so and blatantly violated the above provisions of law. Therefore, the impugned orders are against the spirit of administration of Justice.
- C. That the appellant was imposed the disputed penalty but no regular inquiry was conducted against him in order to substantiate his guilt regarding the so-called allegations and as such the respondents have blatantly violated the law laid down by august Supreme Court of Pakistan reported in various judgments. Right of fair trial is a fundamental right by dint of which a person is entitled to a fair trial and due process of law. The appellant has been deprived of his indispensable fundamental right of fair trial as enshrined in **Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973**. Thus, the impugned orders are bad in law.

D. That it was incumbent upon the respondent No.3 to have served the appellant with a show cause notice before passing the impugned order but he failed to do so and blatantly violated the law laid down by august Supreme Court of Pakistan reported in **1989-SCMR-1690 (citation-a)**. It would be advantageous to reproduce herein the relevant citation for facility of reference:

1989 S C M R 1690
(citation-a)

---S.6--Constitution of Pakistan (1973), Art. 203-F--Repugnancy to Injunctions of Islam--Disclosure by a show-cause notice of grounds on which action under of the Act was proposed to be taken and of an opportunity of hearing to the person concerned against whom an action was required to be taken, held, was necessary and its absence from a statute was repugnant to the Injunctions of Islam.

Hence, the impugned orders are not tenable under the law.

E. That the respondent No.3 was also legally bound to have provided an opportunity of personal hearing to the appellant before awarding him minor penalty being the requirement of law. But he failed to do so and blatantly violated law laid down by august Supreme Court of Pakistan reported in **2002-SCMR-1034 (citation-o)** and **PLD-2008-SC-412 (citation-a)**. The relevant citations are as under:

2002-SCMR-1034
(citation-o)

**----Audi alteram partem--
Application Principle enshrined in maxim "Audi alteram partem" has to be applied in all judicial and non-judicial proceedings notwithstanding the fact that right of hearing has not been expressly provided by the statute governing the proceedings.**

PLD-2008-SC-412
(citation-a)

**----Natural justice, principles of---
Opportunity of hearing---Scope---
Order adverse to interest of a person
cannot be passed without providing
him an opportunity of hearing---
Departure from such rule may
render such order illegal.**

Thus, the impugned orders are against the legal norms of justice.

- F.** That the appellant was awarded disputed penalty for indefinite period in utter violation of FR-29 as well as law laid down by august Supreme Court of Pakistan in various judgments. Thus, the impugned orders are against the legal norms of justice.
- G.** That the respondents No.1 and 2 were under statutory obligation to have applied their independent mind to the merit of the case by taking notice about the illegality and lapses committed by Competent Authority (respondent No.3) as enumerated in earlier paras. But they failed to do so and rejected the departmental appeal as well as revision petition without any cogent reasons. Therefore, the impugned orders are not tenable under the law.
- H.** That the appellant was awarded the disputed punishment under the law of jungle without observing legal and codal formalities. Hence, the impugned orders are not sustainable in the eye of law.
- I.** That the impugned orders are against law, facts of the case and norms of natural justice. Therefore, the same are not warranted under the law.
- J.** That the respondents have passed the impugned orders in mechanical manner and the same are perfunctory as well as non-speaking and also

against the basic principle of administration of justice. Thus, the impugned orders are bad in law.

- K.** That the impugned orders are based on conjectures and surmises as the appellant was never absented from his special duty. Hence, the same are against the legal norms of justice.
- L.** That the appellant would like to seek the permission of this Hon'ble Tribunal to advance some more grounds at the time of arguments.

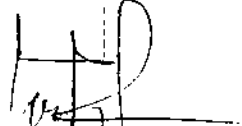
In view of the above narrated facts and grounds, it is, therefore, humbly prayed that the impugned orders of the respondents dated 27-07-2010, 21-06-2019 and 31-07-2019 may very graciously be set aside and the disputed increments of appellant may kindly be restored from the date of stoppage.

Any other relief deemed proper and just in the circumstances of the case, may also be granted.

Through

Dated: 23-08-2019


Appellant


Rizwanullah
M.A. LL.B

Advocate High Court, Peshawar.

**BEFORE THE HON'BLE CHAIRMAN, KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2019

1. Muhammad Tahir, Constable No. 442 Police Line, District Nowshera.

APPELLANT

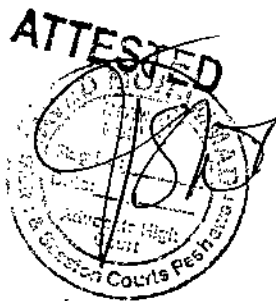
VERSUS

1. The Provincial Police Officer, Government of Khyber Pakhtunkhwa & others.

RESPONDENTS

AFFIDAVIT

I, Muhammad Tahir, Constable No. 442 Police Line, District Nowshera, do hereby solemnly affirm and declare that the contents of the accompanied Service Appeal are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.



27 AUG 2019

M. Tahir

DEPONENT

Annex-A

9

Accounts Office Nowshera
PAYROLL REGISTER
For the month of October, 2010

Page : 445
Date : 18.10.2010

12 sheets

DDO : NR4218 NR4010 Law and Order Nowshera
PAYMENTS Branch Code: 13,240.00

Payroll Section : 001 section 1
DEDUCTIONS Payment through DDO 364.00-

NET PAY 12,876.00 01.10.2010 31.10.2010
Acct. No:

P A Y M E N T S		Prev Pers No: 99994205907	Design: CONSTABLE	(00000394)	Grade: 05 NTR:	Buckle No.: 1094	Gazetted/Non-Gazetted: N
A M O U N T		D E D U C T I O N S		L O A N / F U N D		PRINCIPAL	REPAID BALANCE
0001 Basic Pay	4,620.00	3005 GPF Subscription - Rs		290.00-			
1000 House Rent Allowance	1,002.00	3511 Addl Group Insurance		7.00-			
1300 Medical Allowance	1,000.00	3604 Group Insurance		67.00-			
1547 Ration Allowance	681.00						
1567 Washing Allowance	100.00						
1646 Constabulary R Allow	300.00						
1830 Special Relief All(2	360.00						
1831 Adhoc Relief (2005)	360.00						
1864 Dearnes Allowance (2	448.00						
1901 Risk Allowance (Poli	3,340.00						
1902 Special Incentive Al	775.00						
1908 Adhoc Relief-2009 (0	924.00						
P A Y M E N T S		D E D U C T I O N S					
Branch Code: 13,910.00		Payment through DDO 364.00-		NET PAY		13,546.00	01.10.2010 31.10.2010
						Acct. No:	

P A Y M E N T S		Prev Pers No: 99994205929	Design: CONSTABLE	(00000394)	Grade: 05 NTR:	Buckle No.: 1086	Gazetted/Non-Gazetted: N
A M O U N T		D E D U C T I O N S		L O A N / F U N D		PRINCIPAL	REPAID BALANCE
0001 Basic Pay	4,620.00	3005 GPF Subscription - Rs		290.00-			
1000 House Rent Allowance	1,002.00	3511 Addl Group Insurance		7.00-			
1300 Medical Allowance	1,000.00	3604 Group Insurance		67.00-			
1547 Ration Allowance	681.00						
1567 Washing Allowance	100.00						
1646 Constabulary R Allow	300.00						
1830 Special Relief All(2	360.00						
1831 Adhoc Relief (2005)	360.00						
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1902 Special Incentive Al	775.00						
1908 Adhoc Relief-2009 (0	924.00						
P A Y M E N T S		D E D U C T I O N S					
Branch Code: 13,910.00		Payment through DDO 364.00-		NET PAY		13,546.00	01.10.2010 31.10.2010
						Acct. No:	

P A Y M E N T S		Prev Pers No: 99994205930	Design: CONSTABLE	(00000394)	Grade: 05 NTR:	Buckle No.: 1087	Gazetted/Non-Gazetted: N
A M O U N T		D E D U C T I O N S		L O A N / F U N D		PRINCIPAL	REPAID BALANCE
0001 Basic Pay	4,620.00	3005 GPF Subscription - Rs		290.00-			
1000 House Rent Allowance	1,002.00	3511 Addl Group Insurance		7.00-			
1300 Medical Allowance	1,000.00	3604 Group Insurance		67.00-			
1547 Ration Allowance	681.00						
1567 Washing Allowance	100.00						
1646 Constabulary R Allow	300.00						
1830 Special Relief All(2	360.00						
1831 Adhoc Relief (2005)	360.00						
1864 Dearnes Allowance (2	448.00						
1901 Risk Allowance (Poli	3,340.00						
1902 Special Incentive Al	775.00						
P A Y M E N T S		D E D U C T I O N S					
Branch Code: 13,910.00		Payment through DDO 364.00-		NET PAY		13,546.00	01.10.2010 31.10.2010
						Acct. No:	

10-2-2010
Attested
Appellant
M. Park

10

Accounts Office Nowsheera
PAYROLL REGISTER
For the month of October, 2010

Page : 441
Date : 18.10.2010

DDO : NR4218 - NR4010 Law and Order Nowsheera

Payroll Section : 001 section 1

Branch Code: NR1/SEI

Payment through DDO 364.00-

NET PAY 12,709.00 01-10-2010 31.10.2010
Acct. No:

00141517 IJAZ AHMAD
P A Y M E N T S
Prev Pers No: 99994205634 Desig: CONSTABLE

P A Y M E N T S		D E D U C T I O N S	
A M O U N T	A M O U N T	A M O U N T	A M O U N T
0001 Basic Pay	4,620.00	3005 GPF Subscription - Rs	290.00-
1000 House Rent Allowance	1,002.00	3511 Addl Group Insurance	7.00-
1300 Medical Allowance	1,000.00	3604 Group Insurance	67.00-
1547 Ration Allowance	681.00		
1567 Washing Allowance	100.00		
1646 Constabulary R Allow	300.00		
1830 Special Relief All(2	360.00		
1831 Adhoc-Relief (2005)	360.00		
1864 Dearnes Allowance (2	448.00		
1901 Risk Allowance (Poli	3,340.00		
1902 Special Incentive Al	775.00		
1908 Adhoc Relief-2009 (0	924.00		

PAYMENTS 13,910.00
Branch Code: DEDUCTIONS 364.00-
Payment through DDO NET PAY

Buckle No.: 948
PRINCIPAL
Gazetted/Non-Gazetted: N
REPAID BALANCE
GPF#: PUL 000718
36,689.00

10-2010

00141518 SHAHID KHAN
P A Y M E N T S
Prev Pers No: 99994205645 Desig: CONSTABLE

P A Y M E N T S		D E D U C T I O N S	
A M O U N T	A M O U N T	A M O U N T	A M O U N T
0001 Basic Pay	4,620.00	3005 GPF Subscription - Rs	290.00-
1000 House Rent Allowance	1,002.00	6505 GPF Loan Principal In	1,000.00-
1300 Medical Allowance	1,000.00	3511 Addl Group Insurance	7.00-
1547 Ration Allowance	681.00	3604 Group Insurance	67.00-
1567 Washing Allowance	100.00		
1646 Constabulary R Allow	300.00		
1830 Special Relief All(2	360.00		
1831 Adhoc Relief (2005)	360.00		
1864 Dearnes Allowance (2	448.00		
1901 Risk Allowance (Poli	3,340.00		
1902 Special Incentive Al	775.00		
1908 Adhoc Relief-2009 (0	924.00		

PAYMENTS 13,910.00
Branch Code: DEDUCTIONS 1,364.00-
Payment through DDO NET PAY

13,546.00 01.10.2010 31.10.2010
Acct. No:

Buckle No.: 905
PRINCIPAL
Gazetted/Non-Gazetted: N
REPAID BALANCE
GPF#: PUL 000717
20,000.00 13,000.00 26,800.00
7,000.00

Attested
M. P. Khan
Applicant

00141520 FAHEEM ULLAH
P A Y M E N T S
Prev Pers No: 99994205667 Desig: CONSTABLE

P A Y M E N T S		D E D U C T I O N S	
A M O U N T	A M O U N T	A M O U N T	A M O U N T
0001 Basic Pay	4,620.00	3005 GPF Subscription - Rs	290.00-
1000 House Rent Allowance	1,002.00	6505 GPF Loan Principal In	1,000.00-
1300 Medical Allowance	1,000.00	3511 Addl Group Insurance	7.00-
1547 Ration Allowance	681.00	3604 Group Insurance	67.00-
1567 Washing Allowance	100.00		
1646 Constabulary R Allow	300.00		

PAYMENTS 13,910.00
Branch Code: DEDUCTIONS 1,364.00-
Payment through DDO NET PAY

12,546.00 01.10.2010 31.10.2010
Acct. No:

Buckle No.: 375
PRINCIPAL
Gazetted/Non-Gazetted: N
REPAID BALANCE
GPF#: PULNR000715
20,000.00 11,000.00 26,383.00
9,000.00

11

1970 Adhoc Relief Allow 2

775.00
645.00

11,853.00

DEDUCTIONS
Payment through DDO 539.00-

NET PAY

17,344.00 01.12.2011 31.12.2011
Acct. No:

PAYMENTS
Branch Code:

00141547 ASIM UR HAQ
P A Y M E N T S

Prev. Part No: 99994205907 Desig: CONSTABLE
A M O U N T D E D U C T I O N S

(00000394) Grade 05 MTR
LOAN/FUND

Buckle No.: 1094 Gazetted/Non-Gazetted: N
PRINCIPAL REPAID BALANCE

PF# PBL 000691

46,937.00

DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
0001 Basic Pay	8,000.00	3005 EPF Subscription Rs	465.00
1000 House Rent Allowance	1,000.00	3511 Adm Group Insurance	7.00
1210 Convey Allowance 2G	1,250.00	3604 Group Insurance	67.00
1300 Medical Allowance	1,000.00		
1547 Ration Allowance	681.00		
1567 Washing Allowance	100.00		
1646 Constabulary R Allow	300.00		
1901 Risk Allowance (Poli)	2,010.00		
1902 Special Incentive Al	775.00		
1970 Adhoc Relief Allow 2	717.00		

PAYMENTS
Branch Code:

11,735.00

DEDUCTIONS
Payment through DDO 539.00-

NET PAY

18,196.00 01.12.2011 31.12.2011
Acct. No:

00141551 MOHAMMAD INAYAT
P A Y M E N T S

Prev. Part No: 99994205907 Desig: CONSTABLE
A M O U N T D E D U C T I O N S

(00000394) Grade 05 MTR
LOAN/FUND

Buckle No: 1086 Gazetted/Non-Gazetted: N
PRINCIPAL REPAID BALANCE

PF# PBL 000689

45,622.00

DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
0001 Basic Pay	8,000.00	3005 EPF Subscription Rs	465.00
1000 House Rent Allowance	1,000.00	3511 Adm Group Insurance	7.00
1210 Convey Allowance 2G	1,250.00	3604 Group Insurance	67.00
1300 Medical Allowance	1,000.00		
1547 Ration Allowance	681.00		
1567 Washing Allowance	100.00		
1646 Constabulary R Allow	300.00		
1901 Risk Allowance (Poli)	2,010.00		
1902 Special Incentive Al	775.00		
1970 Adhoc Relief Allow 2	717.00		

PAYMENTS
Branch Code:

11,735.00

DEDUCTIONS
Payment through DDO 539.00-

NET PAY

18,196.00 01.12.2011 31.12.2011
Acct. No

00141552 UMAR INAYAT KHAN
P A Y M E N T S

Prev. Part No: 99994205907 Desig: CONSTABLE
A M O U N T D E D U C T I O N S

(00000394) Grade 05 MTR
LOAN/FUND

Buckle No. 1087 Gazetted/Non-Gazetted: N
PRINCIPAL REPAID BALANCE

PF# PBL 000688

46,937.00

DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
0001 Basic Pay	8,000.00	3005 EPF Subscription Rs	465.00
1000 House Rent Allowance	1,000.00	3511 Adm Group Insurance	7.00
1210 Convey Allowance 2G	1,250.00	3604 Group Insurance	67.00
1300 Medical Allowance	1,000.00		
1547 Ration Allowance	681.00		
1567 Washing Allowance	100.00		
1646 Constabulary R Allow	300.00		
1901 Risk Allowance (Poli)	2,010.00		
1902 Special Incentive Al	775.00		

12-2011

Attested
M. Q. Khan
Appellant

12

00141513 TAJANUL SHAH P A Y M E N T S	AMOUNT	DEDUCTIONS	AMOUNT	LOAN/FUND	PRINCIPAL	REPAID	BALANCE
0001 Basic Pay	8,000.00	3000 GPF Subscription - Rs	465.00-		GPF# POL 000723		46,937.00
1000 House Rent Allowance	2,000.00	3513 Adm Group Insurance	7.00-				
1210 Convey Allowance 20	1,150.00	3600 Group Insurance	67.00-				
1300 Medical Allowance	1,390.00						
1547 Ration Allowance	600.00						
1567 Washing Allowance	100.00						
1646 Constabulary R Allow	300.00						
1901 Risk Allowance (Pol)	5,010.00						
1902 Special Incentive A	700.00						
1970 Adhoc Relief Allow 2	217.00						
PAYMENTS	18,196.00	DEDUCTIONS	539.00-		NET PAY	18,196.00	01.12.2011 31.12.2011
Branch Code		Payment through GPF				Acct. No	

00141516 ZAHIR ALI P A Y M E N T S	AMOUNT	DEDUCTIONS	AMOUNT	LOAN/FUND	PRINCIPAL	REPAID	BALANCE
0001 Basic Pay	6,960.00	3000 GPF Subscription - Rs	465.00-		GPF# POL 000719		46,937.00
1000 House Rent Allowance	2,000.00	3513 Adm Group Insurance	7.00-				
1210 Convey Allowance 20	1,150.00	3600 Group Insurance	67.00-				
1300 Medical Allowance	1,390.00						
1547 Ration Allowance	600.00						
1567 Washing Allowance	100.00						
1646 Constabulary R Allow	300.00						
1901 Risk Allowance (Pol)	5,010.00						
1902 Special Incentive A	700.00						
1970 Adhoc Relief Allow	217.00						
PAYMENTS	17,060.00	DEDUCTIONS	539.00-		NET PAY	17,060.00	01.12.2011 31.12.2011
Branch Code		Payment through GPF				Acct. No	

00141517 IJAZ AHMAD P A Y M E N T S	AMOUNT	DEDUCTIONS	AMOUNT	LOAN/FUND	PRINCIPAL	REPAID	BALANCE
0001 Basic Pay	6,960.00	3000 GPF Subscription - Rs	465.00-		GPF# POL 000718		46,937.00
1000 House Rent Allowance	2,000.00	3513 Adm Group Insurance	7.00-				
1210 Convey Allowance 20	1,150.00	3600 Group Insurance	67.00-				
1300 Medical Allowance	1,390.00						
1547 Ration Allowance	600.00						
1567 Washing Allowance	100.00						
1646 Constabulary R Allow	300.00						
1901 Risk Allowance (Pol)	5,010.00						
1902 Special Incentive A	700.00						
1970 Adhoc Relief Allow	217.00						
PAYMENTS	18,196.00	DEDUCTIONS	539.00-		NET PAY	18,196.00	01.12.2011 31.12.2011
Branch Code		Payment through GPF				Acct. No	

00141518 SHAHID KHAN P A Y M E N T S	AMOUNT	DEDUCTIONS	AMOUNT	LOAN/FUND	PRINCIPAL	REPAID	BALANCE
0001 Basic Pay	6,960.00	3000 GPF Subscription - Rs	465.00-		GPF# POL 000717		42,987.00
1000 House Rent Allowance	2,000.00	3513 Adm Group Insurance	7.00-				
1210 Convey Allowance 20	1,150.00	3600 Group Insurance	67.00-				

12-2011

Attestd
M. P. P.
Appellant

2174 Adhoc Relief Allow-2 2,158.00 978.00

13

PAYMENTS Branch Code: 25,170.00 DEDUCTIONS Payment through DDD 0.00 NET PAY 25,170.00 01.09.2014 30.09.2014 Acct. No:

00141551 MOHAMMAD TAHIR Prev Pers No: 99994205929 Desig: CONSTABLE (00000394) Grade: 05 NTH: Buckle No.: 1086 Gazetted/Non-Gazetted: N- PAYMENTS AMOUNT DEDUCTIONS AMOUNT LOAN/FUND PRINCIPAL REPAYD BALANCE

Table with columns: Description, Amount, Deductions, Net Pay. Rows include: 001 Basic Pay 8,520.00, 000 House Rent Allowance 1,002.00, 1210 Convey Allowance 20 1,932.00, 1300 Medical Allowance 1,200.00, 1547 Ration Allowance 681.00, 1567 Washing Allowance 100.00, 1646 Constabulary R Allow 300.00, 1901 Risk Allowance (Poli 5,010.00, 1902 Special Incentive AI 775.00, 1970 Adhoc Relief Allow 2 717.00, 2118 Adhoc Relief Allow (1,704.00, 2148 15% Adhoc Relief All 1,278.00, 2168 Fixed Daily Allowanc 2,730.00, 2174 Adhoc Relief Allow-2 852.00. Deductions: 3005 GPF Subscription - Rs 465.00, 3511 Addl Group Insurance 7.00, 3604 Group Insurance 67.00. Net Pay: 26,801.00.

9-20-14

PAYMENTS Branch Code: 26,801.00 DEDUCTIONS Payment through DDD 539.00- NET PAY 26,262.00 01.09.2014 30.09.2014 Acct. No:

00141552 USAR INAYAT KHAN Prev Pers No: 99994205930 Desig: CONSTABLE (00000394) Grade: 05 NTH: Buckle No.: 1087 Gazetted/Non-Gazetted: N- PAYMENTS AMOUNT DEDUCTIONS AMOUNT LOAN/FUND PRINCIPAL REPAYD BALANCE

Table with columns: Description, Amount, Deductions, Net Pay. Rows include: 0001 Basic Pay 8,520.00, 1000 House Rent Allowance 1,002.00, 1210 Convey Allowance 20 1,932.00, 1300 Medical Allowance 1,200.00, 1547 Ration Allowance 681.00, 1567 Washing Allowance 100.00, 1646 Constabulary R Allow 300.00, 1901 Risk Allowance (Poli 5,010.00, 1902 Special Incentive AI 775.00, 1970 Adhoc Relief Allow 2 717.00, 2118 Adhoc Relief Allow (1,704.00, 2148 15% Adhoc Relief All 1,278.00, 2168 Fixed Daily Allowanc 2,730.00, 2174 Adhoc Relief Allow-2 852.00. Deductions: 3005 GPF Subscription - Rs 465.00, 3511 Addl Group Insurance 7.00, 3604 Group Insurance 67.00. Net Pay: 26,801.00.

Attest
M. J. J.
Appellant

PAYMENTS Branch Code: 26,801.00 DEDUCTIONS Payment through DDD 539.00- NET PAY 26,262.00 01.09.2014 30.09.2014 Acct. No:

0001 Basic Pay 7,480.00
 1000 House Rent Allowance 1,002.00
 1210 Convey Allowance 20 1,932.00
 1300 Medical Allowance 1,200.00
 1547 Ration Allowance 681.00
 1567 Washing Allowance 100.00
 1646 Constabulary R Allow 300.00
 1901 Risk Allowance (Poli 5,010.00
 1902 Special Incentive Al 775.00
 1970 Adhoc Relief Allow 2 621.00
 2118 Adhoc Relief Allow (1,496.00
 2148 15% Adhoc Relief All 1,122.00
 2168 Fixed Daily Allowanc 2,730.00
 2174 Adhoc Relief Allow-2 748.00

3005 GPF Subscription - Rs 465.00-
 3511 Addl Group Insurance 7.00-
 3604 Group Insurance 67.00-

GPF#: PDL 000719

85,555.00

14

PAYMENTS 25,197.00
 Branch Code: 211/151

DEDUCTIONS
 Payment through DDD

539.00-

NET PAY

24,658.00 01.09.2014 30.09.2014
 Acct. No:

00141517 IJAZ AHMAD
 PAYMENTS ✓

Prev Pers No: 99994205634 Desig: CONSTABLE
 AMOUNT DEDUCTIONS AMOUNT

(00000394) Grade: 05 NTN:
 LOAN/FUND

Buckle No.: 948
 PRINCIPAL

Gazetted/Non-Gazetted: N
 REPAYED BALANCE

0001 Basic Pay 8,520.00
 1000 House Rent Allowance 1,002.00
 1210 Convey Allowance 20 1,932.00
 1300 Medical Allowance 1,200.00
 1547 Ration Allowance 681.00
 1567 Washing Allowance 100.00
 1646 Constabulary R Allow 300.00
 1901 Risk Allowance (Poli 5,010.00
 1902 Special Incentive Al 775.00
 1970 Adhoc Relief Allow 2 717.00
 2118 Adhoc Relief Allow (1,704.00
 2148 15% Adhoc Relief All 1,278.00
 2168 Fixed Daily Allowanc 2,730.00
 2174 Adhoc Relief Allow-2 852.00
 5002 Adjustment House Ren 290.00
 5011 Adj Conveyance Allow 560.00
 5054 Adj Ration Allowance 197.00
 5070 Adj Washing Allowance 29.00
 5079 Adj C.R.A Allowance 87.00

3005 GPF Subscription - Rs 465.00-
 3511 Addl Group Insurance 7.00-
 3604 Group Insurance 67.00-

GPF#: PDL 000718

77,694.00

9-2014

Attested
 M. P. Khan
 M. P. Khan

Government of Khyber Pakhtunkhwa
District Accounts Office Nowshera
Monthly Salary Statement (January-2018)



15

Personal Information of Mr MOHAMMAD TAHIR d/w/s of FAZAL MOHAMMAD

Personnel Number: 00141551 CNIC: 99994205929 NTN:
 Date of Birth: 22.03.1978 Entry into Govt. Service: 30.01.2002 Length of Service: 16 Years 00 Months 003 Days

Employment Category: Active Temporary

Designation: CONSTABLE *16/3* 80003634-GOVERNMENT OF KHYBER PAKHTUNKHWA
 DDO Code: NR4218-NR4010 Law and Order Nowshera
 Payroll Section: 001 GPF Section: 001 Cash Center:
 GPF A/C No: POL 000689 Interest Applied: Yes **GPF Balance:** 130,546.00
 Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 05 Pay Stage: 16

Wage type		Amount	Wage type		Amount
0001	Basic Pay	18,260.00	1000	House Rent Allowance	1,002.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
1547	Ration Allowance	681.00	1567	Washing Allowance	150.00
1646	Constabulary R Allowance	300.00	1901	Risk Allowance (Police)	3,340.00
1902	Special Incentive Allowance	775.00	2148	15% Adhoc Relief All-2013	439.00
2168	Fixed Daily Allowance	2,730.00	2199	Adhoc Relief Allow @10%	294.00
2211	Adhoc Relief All 2016 10%	1,489.00	2224	Adhoc Relief All 2017 10%	1,826.00

Deductions - General

Wage type		Amount	Wage type		Amount
3005	GPF Subscription - Rs 890	-890.00	3530	Police welfare Fund BS-1 to 18	-365.00
3609	Income Tax	-11.00	4004	R. Benefits & Death Comp:	-690.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 84.86 Recovered till January-2018: 30.00 Exempted: 0.01 Recoverable: 54.85

Gross Pay (Rs.): 34,718.00 Deductions: (Rs.): -1,956.00 Net Pay: (Rs.): 32,762.00

Payee Name: MOHAMMAD TAHIR
 Account Number:
 Bank Details: . . .

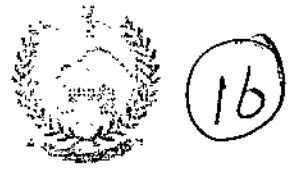
Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: NSR
 City: NOWSHERA Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address:
 City: Email:

Attested
M. P. P. Appellant

(140122/25.01.2018/16:25:55) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

Government of Khyber Pakhtunkhwa
District Accounts Office Nowshera
Monthly Salary Statement (January-2018)



Personal Information of Mr IJAZ AHMAD d/w/s of ABDUL REHMAN

Personnel Number: 00141517 CNIC: 1720122627857 NTN:
 Date of Birth: 01.01.1978 Entry into Govt. Service: 31.01.2002 Length of Service: 16 Years 00 Months 002 Days

Employment Category: Active Temporary

Designation: CONSTABLE *اعجاز احمد* 80003634-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4218-NR4010 Law and Order Nowshera

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: POL 000718 Interest Applied: Yes **GPF Balance:** 140,802.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 05 Pay Stage: 16

Wage type		Amount	Wage type		Amount
0001	Basic Pay	18,260.00	1000	House Rent Allowance	1,002.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
1547	Ration Allowance	681.00	1567	Washing Allowance	150.00
1646	Constabulary R Allowance	300.00	1901	Risk Allowance (Police)	3,340.00
1902	Special Incentive Allowance	775.00	2148	15% Adhoc Relief All-2013	439.00
2168	Fixed Daily Allowance	2,730.00	2199	Adhoc Relief Allow @10%	294.00
2211	Adhoc Relief All 2016 10%	1,489.00	2224	Adhoc Relief All 2017 10%	1,826.00

Deductions - General

Wage type		Amount	Wage type		Amount
3005	GPF Subscription - Rs 890	-890.00	3530	Police wel:Fud BS-I to 18	-365.00
3609	Income Tax	-14.00	4004	R. Benefits & Death Comp:	-690.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 113.86 Recovered till January-2018: 45.00 Exempted: 0.19- Recoverable: 69.05

Gross Pay (Rs.): 34,718.00 Deductions: (Rs.): -1,959.00 Net Pay: (Rs.): 32,759.00

Payee Name: IJAZ AHMAD

Account Number: 02227901816303

Bank Details: HABIB BANK LIMITED, 220222 CANTT BRANCH, NOWSHERA, CANTT BRANCH, NOWSHERA., NOWSHERA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: NSR

City: NOWSHERA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

Attest

M. P. Pappalant

(140122/25.01.2018/16-25:55) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

Government of Khyber Pakhtunkhwa
District Accounts Office Nowshera
Monthly Salary Statement (January-2019)



Personal Information of Mr MOHAMMAD TAHIR d/w/s of FAZAL MOHAMMAD

Personnel Number: 00141551 CNIC: 99994205929 NTN:
 Date of Birth: 22.03.1978 Entry into Govt. Service: 30.01.2002 Length of Service: 17 Years 00 Months 003 Days

Employment Category: Active Temporary

Designation: CONSTABLE 80003634-GOVERNMENT OF KHYBER PAKH
 DDO Code: NR4218-NR4010 Law and Order Nowshera
 Payroll Section: 001 GPF Section: 001 Cash Center:
 GPF A/C No: POL 000689 Interest Applied: Yes **GPF Balance:** 157,649.00
 Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 07 Pay Stage: 12

Wage type		Amount	Wage type		Amount
0001	Basic Pay	18,310.00	1000	House Rent Allowance	1,589.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
1547	Ration Allowance	681.00	1567	Washing Allowance	150.00
1646	Constabulary R Allowance	300.00	1901	Risk Allowance (Police)	3,530.00
1902	Special Incentive Allowance	775.00	2148	15% Adhoc Relief All-2013	439.00
2168	Fixed Daily Allowance	2,730.00	2199	Adhoc Relief Allow @10%	294.00
2211	Adhoc Relief All 2016 10%	1,489.00	2224	Adhoc Relief All 2017 10%	1,831.00
2247	Adhoc Relief All 2018 10%	1,831.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3007	GPF Subscription - Rs1010	-1,010.00	3530	Police welfare BS-1 to 18	-366.00
3609	Income Tax	-83.00	4004	R Benefits & Death Comp	-690.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 1,000.00 Recovered till January-2019: 586.00 Exempted: 0.15 Recoverable: 414.15

Gross Pay (Rs.): **37,381.00** Deductions: (Rs.): **-2,149.00** Net Pay: (Rs.): **35,232.00**

Payee Name: MOHAMMAD TAHIR
 Account Number: 02227901964503
 Bank Details: HABIB BANK LIMITED, 220222 CANTT BRANCH, NOWSHERA, CANTT BRANCH, NOWSHERA, NOWSHERA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: NSR
 City: NOWSHERA Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address: Email:
 City:

Attest

*M. Rafiq
 Applicant*

1220

Government of Khyber Pakhtunkhwa
District Accounts Office Nowshera
Monthly Salary Statement (January-2019)



18

Personal Information of Mr IJAZ AHMAD d/w/s of ABDUL REHMAN

Personnel Number: 00141517 CNIC: 1720122627857

NTN:

Date of Birth: 01.01.1978

Entry into Govt. Service: 31.01.2002

Length of Service: 17 Years 00 Months 002 Days

Employment Category: Active Temporary

Designation: CONSTABLE

131/151

80003634-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4218-NR4010 Law and Order Nowshera

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No: POL 000718

Interest Applied: Yes

GPF Balance:

168,265.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 07

Pay Stage: 14

Wage type		Amount	Wage type		Amount
0001	Basic Pay	19,530.00	1000	House Rent Allowance	1,589.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
1547	Ration Allowance	681.00	1567	Washing Allowance	150.00
1646	Constabulary R Allowance	300.00	1901	Risk Allowance (Police)	3,530.00
1902	Special Incentive Allowance	775.00	2148	15% Adhoc Relief All-2013	439.00
2168	Fixed Daily Allowance	2,730.00	2199	Adhoc Relief Allow @10%	294.00
2211	Adhoc Relief All 2016 10%	1,489.00	2224	Adhoc Relief All 2017 10%	1,953.00
2247	Adhoc Relief All 2018 10%	1,953.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3007	GPF Subscription - Rs1010	-1,010.00	3530	Police welfare BS-1 to 18	-391.00
3609	Income Tax	-83.00	4004	R. Benefits & Death Comp:	-690.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 1,000.00 Recovered till January-2019: 586.00 Exempted: 0.15- Recoverable: 414.15

Gross Pay (Rs.): 38,845.00 Deductions: (Rs.): -2,174.00 Net Pay: (Rs.): 36,671.00

Payee Name: IJAZ AHMAD

Account Number: 02227901816303

Bank Details: HABIB BANK LIMITED, 220222 CANTT BRANCH, NOWSHERA. CANTT BRANCH, NOWSHERA., NOWSHERA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: NSR

City: NOWSHERA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

Attested

M. P. P. -
Appellant

(140122/25.01.2019/13:02:26) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

Government of Khyber Pakhtunkhwa

District Accounts Office Nowshera
Monthly Salary Statement (July-2019)



1220

Personal Information of Mr MOHAMMAD TAHIR d/w/s of FAZAL MOHAMMAD

Personnel Number: 00141551 CNIC: 99994205929 NTN:
Date of Birth: 22.03.1978 Entry into Govt. Service: 30.01.2002 Length of Service: 17 Years 06 Months 003 Days

Employment Category: Active Temporary

Designation: CONSTABLE 80003634-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4218-NR4010 Law and Order Nowshera

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: POL 000689 Interest Applied: Yes GPF Balance: 163,709.00

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 07 Pay Stage: 12

Wage type		Amount	Wage type		Amount
0001	Basic Pay	18,310.00	1000	House Rent Allowance	1,589.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
1547	Ration Allowance	681.00	1567	Washing Allowance	150.00
1646	Constabulary R Allowance	300.00	1901	Risk Allowance (Police)	3,530.00
1902	Special Incentive Allowance	775.00	2148	15% Adhoc Relief All-2013	439.00
2168	Fixed Daily Allowance	2,730.00	2199	Adhoc Relief Allow @ 10%	294.00
2211	Adhoc Relief All 2016 10%	1,489.00	2224	Adhoc Relief All 2017 10%	1,831.00
2247	Adhoc Relief All 2018 10%	1,831.00	2264	Adhoc Relief All 2019 10%	1,831.00

Deductions - General

Wage type		Amount	Wage type		Amount
3007	GPF Subscription - Rs1010	-1,010.00	3530	Police welfare BS-1 to 18	-366.00
4004	R. Benefits & Death Comp:	-690.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 0.00 Recovered till July-2019: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 39,212.00 Deductions: (Rs.): -2,066.00 Net Pay: (Rs.): 37,146.00

Payee Name: MOHAMMAD TAHIR
Account Number: 02227901964503
Bank Details: HABIB BANK LIMITED, 220222 CANTT BRANCH, NOWSHERA, CANTT BRANCH, NOWSHERA, NOWSHERA

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address: NSR City: NOWSHERA Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
Temp. Address: City: Email:

Attested
M. P. Appellant

(50486881/29.07.2019/16:12:47)2 All amounts are in Pak Rupees 3) Errors & omissions excepted

Government of Khyber Pakhtunkhwa
District Accounts Office Nowshera
Monthly Salary Statement (July-2019)



Personal Information of Mr IJAZ AHMAD d/w/s of ABDUL REHMAN

Personnel Number: 00141517 CNIC: 1720122627857 NTN:
 Date of Birth: 01.01.1978 Entry into Govt. Service: 31.01.2002 Length of Service: 17 Years 06 Months 002 Days

Employment Category: Active Temporary

Designation: CONSTABLE *12/12/1* 80003634-GOVERNMENT OF KHYBER PAKH

DDO Code: NR4218-NR4010 Law and Order Nowshera

Payroll Section: 001 GPF Section: 001 Cash Center:

GPF A/C No: POL 000718 Interest Applied: Yes **GPF Balance: 174,325.00**

Vendor Number: -

Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 07 Pay Stage: 14

Wage type		Amount	Wage type		Amount
0001	Basic Pay	19,530.00	1000	House Rent Allowance	1,589.00
1210	Convey Allowance 2005	1,932.00	1300	Medical Allowance	1,500.00
1547	Ration Allowance	681.00	1567	Washing Allowance	150.00
1646	Constabulary R Allowance	300.00	1901	Risk Allowance (Police)	3,530.00
1902	Special Incentive Allowance	775.00	2148	15% Adhoc Relief All-2013	439.00
2168	Fixed Daily Allowance	2,730.00	2199	Adhoc Relief Allow @10%	294.00
2211	Adhoc Relief All 2016 10%	1,489.00	2224	Adhoc Relief All 2017 10%	1,953.00
2247	Adhoc Relief All 2018 10%	1,953.00	2264	Adhoc Relief All 2019 10%	1,953.00

Deductions - General

Wage type		Amount	Wage type		Amount
3007	GPF Subscription - Rs1010	-1,010.00	3530	Police wcl:Fud BS-1 to 18	-391.00
4004	R. Benefits & Death Comp:	-690.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till July-2019: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 40,798.00 Deductions: (Rs.): -2,091.00 Net Pay: (Rs.): 38,707.00

Payee Name: IJAZ AHMAD
 Account Number: 02227901816303
 Bank Details: HABIB BANK LIMITED. 220222 CANTT BRANCH, NOWSHERA. CANTT BRANCH, NOWSHERA., NOWSHERA

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: NSR

City: NOWSHERA

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email:

(50486881/29.07.2019/10:12:47) 2) All amounts are in Pak Rupees 3) Errors & omissions excepted

Attested
As Puri
Appellant

Absent from duty (3 days) & 3 months
accumulated punishment & arrears

o.B.N. 500
dt 31-5-10

Y. V. / 10/10/10

Absent from special duty on 25-7-10
awarded 100 days minor punishment stopping
& arrears with accumulative effect.

o.B.N. 816
dt 27-7-10

M. P. / 2

DP/MSR

Absent from duty (3 days) & 100 days
100 days minor punishment & arrears
R.S. 700/100 as posted is leave without
pay

100/

o.B.N. 100/
dt 25-7-10

~~DP/MSR~~
DP/MSR
M.

Attested

M. P. /
Appellant

To: - The Regional Police Officer,
Mardan.

Through: - Proper Channel

Subject: - MERCY PETITION.

Sir,

With due respect I beg to submit that I have been awarded a minor punishment of stoppage of 2 years increments with accumulative effect by the then District Police Officer Nowshera, vide OB No.816 dated 27/07/2010 for the allegation of absence from special duty against which I have submitted an Appeal to the DIG Mardan Region- I Mardan for favorable consideration, but it was not considered. Hence, the present Mercy Petition is forwarded for favorable and sympathetic consideration:-

1. I have already performed the said special duty, but after attending duty when came back to Police Station, it was learnt that I was marked as absent. I have told the Moharar to record my presence report in the DD who said that he is going to correct the report, but it was not done.
2. I was also neither issued/received any CS/SOA, show cause notice, final show cause notice, nor was any Enquiry conducted as required under the rules but I was awarded the above cited very severe and harsh punishment.
3. I was also not given any opportunity of personal hearing in this case.
4. Due to this impugned order, I have put to great financial loss and my service career has also been damaged.
5. During my visit to Establishment Branch District Police Office Nowshera I came to know about the said punishment order, hence the present Mercy Petition has been drafted which is being submitted now. Therefore, delay in submission of appeal may kindly be condoned.
6. I have a long service and am performing my duties up to the entire satisfaction of my superiors with clean & clear record.
7. The punishment awarded to me is a permanent which will affect not my pension only but it will suffer my family in the long term.

Therefore, I approach your good self to kindly accept my Mercy Petition, the order of punishment of stoppage of 2 years increments with accumulative effect awarded by the then DPO Nowshera vide OB No.816 dated 27/10/2010 may kindly be withdrawn, so that my service career may not be damaged.

I shall be highly obliged and will pray for your long life and prosperity.

Yours Obediently,

M. Tahir
(Muhammad Tahir)

LHC No. 442

Police Lines Nowshera

11-6-2019

OFFICE OF THE
DISTRICT POLICE OFFICER,
NOWSHERA

Tel No. 0923-9220102 & Fax No. 0923-9220103
Email dpo_nowsherapk@yahoo.com

23

2019

To,

The Regional Police Officer,
Mardan.

No. 2276 /PA, Dated Nowshera, the 13.06 /2019.

Subject: APPEAL

Memo:

Enclosed please find herewith appeal preferred by Constable Muhamr
Tahir No. 442 of this district police is forwarded for further necessary action, please.

Attested

M. D. Khan
Appellant

District Police Office
Nowshera

ORDER.

PA

Annex-D

1

24

This order will dispose-off the departmental appeal preferred by **Constable Muhammad Tahir No. 442** of Nowshera District Police against the order of District Police Officer, Nowshera, wherein he was awarded Minor punishment of stoppage of two annual increments with cumulative effect vide OB No. 816 dated 27.07.2010, due to absented himself from special duty.

The appellant was awarded Minor Punishment of Stoppage of two increments with cumulative effect due to his absence from Special duty on 27.07.2010. Therefore, I find no grounds to intervene into the order passed by the then District Police Officer, Nowshera. His appeal is also time barred for nine years. **Hence field.**

ORDER ANNOUNCED.

Muhammad
(MUHAMMAD ALI KHAN)PSP
Regional Police Officer,
Mardan.

No. 9021/ES,

Dated Mardan the 21/06 /2019.

✓ Copy to District Police Officer, Nowshera for information and necessary action w/r to his office Memo: No. 2774/PA dated 13.06.2019. The Service Record is returned herewith.

(*****)

483

25/06/19

EC/FMC

For m. adras

Attested

M. Qasim
Appellant

DPO NSR
25/6/19

Annex-E

25

To: - The Inspector General of Police,
Khyber Pakhtunkhwa Peshawar.

Through: - Proper Channel

Subject: - MERCY PETITION.

Sir,

With due respect I beg to submit that I have been awarded a minor punishment of stoppage of 2 years increments with accumulative effect by the then District Police Officer Nowshera, vide OB No.816 dated 27/07/2010 for the allegation of absence from special duty against which I have submitted an Appeal to the DIG ~~Mardan~~ Region- I ~~Mardan~~ for favorable consideration, but it was not considered. Hence, the present Mercy Petition is forwarded for favorable and sympathetic consideration:-

1. I have already performed the said special duty, but after attending duty when came back to Police Station, it was learnt that I was marked as absent. I have told the ~~Moharax~~ to record my presence report in the DD who said that he is going to correct the report, but it was not done.
2. I was also neither issued/received any CS/SOA, show cause notice, final show cause notice, nor was any Enquiry conducted as required under the rules but I was awarded the above cited very severe and harsh punishment.
3. I was also not given any opportunity of personal hearing in this case.
4. Due to this impugned order, I have put to great financial loss and my service career has also been damaged.
5. During my visit to Establishment Branch District Police Office Nowshera I came to know about the said punishment order, hence the present Mercy Petition has been drafted which is being submitted now. Therefore, delay in submission of appeal may kindly be condoned.
6. I have a long service and am performing my duties up to the entire satisfaction of my superiors with clean & clear record.
7. The punishment awarded to me is a permanent which will affect not my pension only but it will suffer my family in the long term.

Therefore, I approach your good self to kindly accept my Mercy Petition, the order of punishment of stoppage of 2 years increments with accumulative effect awarded by the then DPD Nowshera vide OB No.816 dated 27/10/2010 may kindly be withdrawn, so that my service career may not be damaged.

I shall be highly obliged and will pray for your long life and prosperity.

Yours Obediently,

M. Tahir
(Muhammad Tahir)

LHC No. 442
Police Lines Nowshera

4-7-2019

4/7/19

PA
27

**Government of Khyber Pakhtunkhwa
Office of the Regional Police Officer,
Mardan**

Phone No. 0937-9230113, Fax No. 0937-9230115.
Email Address: - esrppomardan@gmail.com

To: The Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

No. _____ /ES.

15⁷ July, 2019.

Subject: **MERCY PETITION.**

Memo:

District Police Officer, Nowshera has forwarded application of LHC Muhammad Tahir. No. 442 of Nowshera District Police requesting therein for restoration of two annual increments.

His mercy petition alongwith other relevant papers is submitted herewith for favour of further necessary action please.


**Regional Police Officer,
Mardan.**

No. 9784 /ES.

Copy to District Police Officer, Nowshera for information w/r to his office Memo: No. 3145/PA dated 05.07.2019.

Seen


**Regional Police Officer,
Mardan.**

DP Nowshera
15/07/19



Annea-77

28

KA

2607
2-8-19

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar.

No. S/ 2765 /19, dated Peshawar the 24/07/2019.

To : The Regional Police Officer,
Mardan.

Subject - Mercy Petition.

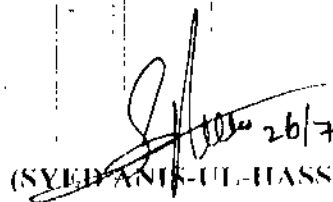
Memo:

Please refer to your office Memo No. 9783/ES, dated 15/07/2019

The Competent Authority has examined and filed the mercy petition submitted by LHC Muhammad Tahir No. 442 of Nowshera district Police against the punishment of stoppage of 02-years increment with cumulative effect awarded by DPO, Nowshera vide OR No. 816, dated 27.07.2010, being badly time barred.

The applicant may please be informed accordingly.

EC
PPS
31/7
Siv
pps Attached.
A/EC

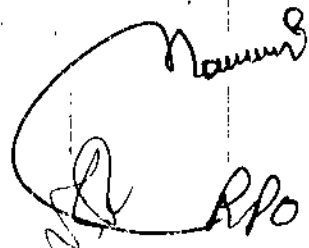

(SYED ANIS-UL-HASSAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

-NO. 10274/ES
D.F. 02-8-19

EC/DPO NSR.

For Maktim

EC/FMC
For Maktim


RPO Mardan
11/8/19

1446
05/08/19

Attest
M. Pali
Appellant

Before the Honble Chairman, KPK Service Tribunal,
Peshawar

بعدالت

Service Appeal

(Appellant) ² بنام Muhammad Tahir مورخہ

vs Provincial Police Officer etc. مقدمہ

باعث تحریر آئینکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آج مقام Peshawar کیلئے Rajwanullah

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر حالت ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک دروپہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ
پر واختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

3

Attested & accepted

2019 August

المترقوم

واہ الع

بمقام Peshawar کے لئے منظور ہے۔

**BEFORE THE HONOURABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 1097/2019

Muhammad Tahir, Constable No. 442 Police Lines, Nowshera.

.....Appellant

V E R S U S

1. The Provincial Police Officer, Khuyber Pakhtunkhwa, Peshawar..
2. The Regional Police Officer, Mardan Region-I; Mardan.
3. The District Police Officer, Nowshera.

.....Respondents

REPLY ON BEHALF OF RESPONDENTS No.1,2&3

Respectfully Sheweth:

PRELIMINARY OBJECTIONS

1. That the appellant has got no cause of action.
2. That the appeal is badly time-barred.
3. That the appellant has been estopped by his own conduct to file the instant appeal.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to the Honourable Tribunal with clean hands.

On Facts

1. Para to the extent of enlistment of appellant in Police Department pertains to record hence, needs no comments while regarding rest of the para, it is stated that appellant on 27-07-2010 absented himself from special duty hence, he was awarded minor punishment of stoppage of 02 annual increments with cumulative effect vide OB No. 816 dated 27-07-2010, but short after the said punishment, district Nowshera was hit by devastating flood of 2010 which washed out all the official record besides, other damages. Therefore, the punishment order was not materialized and the appellant was regularly drawing his regular pay. However, when the year 03-01-2018 the post of constable BPS-05 was upgraded to BPS-07 and basic pay of all the officials was being fixed, during that time it was noticed that though appellant had been awarded the aforementioned punishment but no deduction had been made. Hence, due to the same fact, increments were stopped on the ground of punishment earlier awarded to the appellant.


2. Para already explained needs no comments.
3. Correct to the extent that appellant moved departmental appeal before respondent No.02 but the same was filed being time barred. Similarly, appellant also moved mercy petition before the respondent No. 01 which was also filed the same on the grounds of its being time barred.
4. That the appeal of the appellant is liable to be dismissed on the following grounds: -

GROUNDS

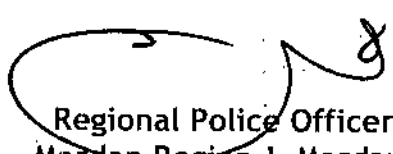
- A. Incorrect. Orders passed by the respondents are in accordance with law, facts and principles of the natural justice, hence, sustainable in the eye of law.
- B. Incorrect. As discussed earlier, this District had been hit by the devastating flood of 2010, therefore, no record is available of the said period.
- C. Incorrect. The appellant on 27-07-2010 absented himself from special duty hence, he was awarded minor punishment of stoppage of 02 annual increments with cumulative effect.
- D. Para already explained hence, no comments.
- E. Incorrect. Appellant was awarded minor punishment of stoppage of 02 annual increments with cumulative effect in the year 2010 which was not materialized at that time due to the flood. So, plea of the appellant that he was not provided an opportunity of personal hearing is not plausible.
- F. Para already explained needs no comments.
- G. Incorrect. As discussed in the preceding paras that appellant was awarded minor punishment in the year 2010 but as short of the punishment order this district was hit by the devastating flood and all the record of this district was totally destroyed. Therefore, punishment order of the appellant was not materialized and taking advantage of the situation he also kept mum. Now when as per punishment his increments have been stopped he moved departmental appeal as well as mercy petition to the high-ups which were filed due to being badly time barred.
- H. Para already explained hence, no comments.

- I. Incorrect. Orders passed by the respondents are in accordance with law, facts and principles of the natural justice, hence, sustainable in the eye of law.
- J. Para already explained hence, no comments.
- K. Para explained earlier needs no comments.
- L. That the respondents also seek permission of this Honourable Tribunal to advance additional grounds at the time of arguments.

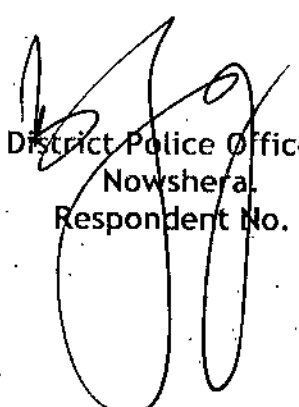
It is, therefore, most humbly prayed that on acceptance of above submissions the appeal of the appellant may very kindly be dismissed with cost.



Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.
Respondent No.1



Regional Police Officer,
Mardan Region-I, Mardan.
Respondent No. 02



District Police Officer,
Nowshera.
Respondent No. 3

**BEFORE THE HONOURABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 1097/2019

Muhammad Tahir, Constable No. 442 Police Lines, Nowshera.

.....Appellant

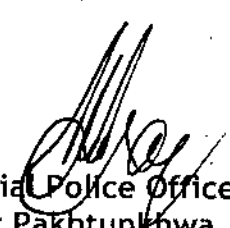
V E R S U S

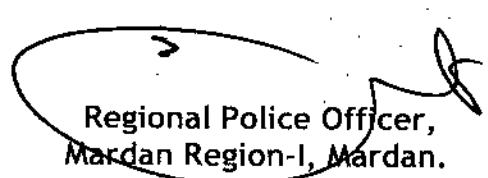
1. The Provincial Police Officer, Khuyber Pakhtunkhwa, Peshawar..
2. The Regional Police Officer, Mardan Region-I, Mardan.
3. The District Police Officer, Nowshera.

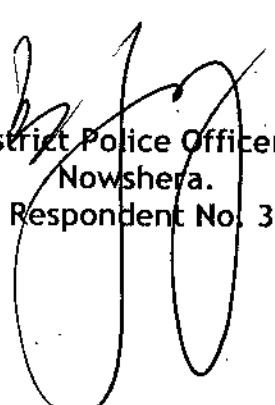
.....Respondents

AFFIDAVIT

We the respondents No. 1,2 &3 do hereby solemnly affirm and declare on Oath that the contents of reply to the appeal are true and correct to the best of our knowledge and belief and nothing has been concealed from the Honourable tribunal.


Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar.
Respondent No.1


Regional Police Officer,
Mardan Region-I, Mardan.
Respondent No. 02


District Police Officer,
Nowshera.
Respondent No. 3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 1097/2019

Muhammad Tahir **Versus** Police.

Subject:- **PERUSAL OF ORIGINAL RECORD FOR TRIBUNAL S WELL AS
APPELLANTS COUNSEL.**

Sir,

The respondents submit as under:-

1. That the above titled case is fixed for today's date i.e. 22/11/2022.
2. That during the course of arguments by appellant's counsel the objection was raised that the required documents have not been placed on file and the same cannot be relied if produced by the Law Officer during his arguments.
3. That categorically it has been narrated in respondents comments that because of flood in Nowshera, the record is missing.
4. That the same record has been checked which was found later on but due to the mud, the photostate copies cannot be taken.
5. That the respondents request for perusal of the original record by the Tribunal as well as appellants counsel.

It is, therefore, requested order may pleased be passed accordingly.

Respondents

Through .

Dated: 22/11/2022



Assistant Advocate General.
Khyber Pakhtunkhwa,
Peshawar.