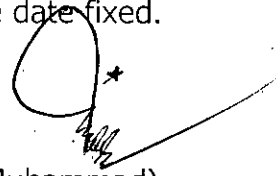


23.05.2022

Nemo for the appellant. Mr. Kabirullah Khattak, Addl. AG alongwith Mr. Ihsan Ullah ASI for the respondents present.

Written reply/comments on behalf respondents submitted which is placed on file. To come up for rejoinder if any, and arguments on 29.07.2022 before D.B. Notice be also issued to the appellant and his counsel for the date fixed.

Noted on
S. P. C. J.
19/7/22




(Mian Muhammad)
Member (E)

29th July, 2022

Appellant in person present. Mr. Nasirud Din Shah, Addl. AG for the respondents present.

2. Appellant states that his grievance has been redressed, therefore, he does not press this appeal. As a token of admission of his submission, he signed the margin of the order sheet. Dismissed as withdrawn. Consign: *2022*

3. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 29th day of July, 2022.*



(Salah-ud-Din)
Member (J)



(Kalim Arshad Khan)
Chairman

Handwritten notes in Urdu on the left margin, including the date 19/7/22 and other illegible text.

13.12.2021

Junior of learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

Learned AAG seeks time to contact the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 16.02.2022 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

16.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 03.03.2022 for the same as before.


Reader

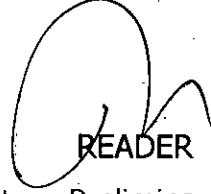
3.3.22

Due to retirement of the Honble Chairman the case is adjourned to come for the same as before on 23/5/22


Reader

08.04.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 15.07.2021 for the same as before.

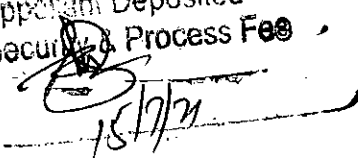

READER

15.07.2021

Counsel for the appellant present. Preliminary arguments heard.

In view of particular legal position to be discussed hereinafter, the bar of limitation for the time-being is immaterial. In wake of COVID, 19, the Government of Khyber Pakhtunkhwa for the first time declared Public Health Emergency in March, 2020 for three months which was extended from time to time for further term and presently it has been extended by the Government vide Notification No. SOG/HD/1-102/Covid-19/2020/3062, dated 30.06.2021 for the period from 01.07.2021 to 30.09.2021. The case of the appellant falls within the period of emergency. In view of Section 30 of the Khyber Pakhtunkhwa Epidemic Control and Emergency Relief Act, 2020, the limitation period provided under any law shall remain frozen. This appeal having been filed after promulgation of the said Act, is not affected by bar of limitation. Excluding the case of appellant from rigors of limitation, his appeal is fit for full hearing. Keeping the question of limitation relating to filing of instant appeal intact for determination during full hearing, this appeal, subject to all just and legal objections including objection of limitation is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 13.12.2021 before the D.B.

Appellant Deposited
Security & Process Fee


15/7/21

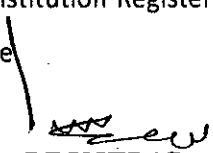

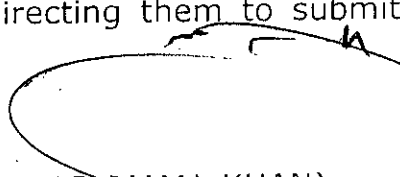

Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 15183 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/11/2020	<p>The appeal of Mr. Wajid Hayat presented today by Mr. Muhammad Ayub Shinwari 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> <p>2-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>11/01/2021</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>11.01.2021</p> <p>Appellant is present alongwith Mr. Muhammad Ayoub Shinwari, Advocate.</p> <p>In view of the arguments addressed at the bar by the learned counsel representing appellant, it is deemed appropriate to issue pre-admission notice to respondents for 08.04.2021, simultaneously, directing them to submit their reply/comments before S.B.</p> <p style="text-align: right;"> (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)</p>

In The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No _____/2020

Wajid Hayat Versus I.G Police, KP & Others

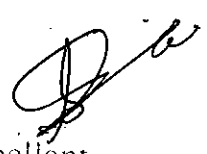
INDEX

S. No	Description of Document	Dated	Annex	Pg No
1.	Service Appeal			1-3
2.	Affidavit			4
3.	Copy of Order	26-06-20	A	5
4.	Copy of Departmental Appeal	03-09-20	B	6
5.	Copy of order	19-10-20	C	7
	<i>wahalat nama</i>		—	8

Dated: /11/2020

Through

Appellant,


Muhammad Ayub Khan Shinwari
Advocate Peshawar

Chamber:

7-A, Haroon Mansion,
Khyber Bazar, Peshawar.

Cell No 03219068514

In The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No 15183 /2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 15697

Dated 26/11/2020

Wajid Hayat,
Constable No 2884
Frontier Reserved Police, Peshawar

....Appellant

Versus

1. Inspector General of Police, Government of Khyber Pakhtunkhwa, Peshawar
2. Commandant, Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar
3. Superintendent of Police, FRP, Peshawar Range

....Respondents

Service Appeal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 19-10-2020.

Prayer:

on acceptance of this Service Appeal the impugned order dated 26-06-2020 whereby a major penalty of bringing the appellant to the lowest stage is imposed on the appellant and the Office Order dated 19-10-2020 whereby Departmental Appeal of the Appellant is dismissed be set aside and the respondents may kindly be directed to restore the appellant to his original stage in a time scale and all the deductions made from the monthly salary of the appellant be restored/paid to the appellant along with arrears.

Respectfully Sheweth,

Brief but relevant facts of the case are as follows:

1. That the Appellant is serving as constable in the respondent Department and ever since his appointment, the Appellant has performed his duties to entire satisfaction of his superiors without any complaint from any quarter concerned.

Filed to-day
Registrar
26/11/2020

2. That the Appellant on the charge of making bogus entries of passing A-1 exam in 2013 into his service record was awarded a major penalty of bringing him to the lower stage of constable vide office order dated 26-06-2020. As evident from the said office order, the copy of said order is not communicated to the appellant, the appellant received the said order on 02-09-2020. (Copy of the order is filed herewith and annexed as Annex-A)
 3. That it is pertinent to mention here that the aforesaid Office Order whereby a major penalty of reduction to lowest stage in a time scale is imposed on the Appellant is passed without holding any inquiry, without giving any show cause Notice, without giving any chance of hearing to the Appellant, without giving any final show cause Notice to the Appellant, without recording any evidence, without confronting the appellant with the alleged bogus entries of passing A-1 exam in 2013 into his service book and in utter disregard of the mandatory provisions of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.
 4. That against the aforesaid Office Order the Appellant filed a Departmental Appeal on 03-09-2020, which was dismissed vide Order dated 19-10-2020 being time barred. The copy of the Office Order dated 19-10-2020 is received/communicated to the appellant on 29-10-2020 (copy of the Departmental appeal and order is filed herewith and annexed as Annex-B & C)
- Hence this Service Appeal on the following amongst other grounds:
- a. That the impugned order is against the law, illegal, unlawful, without lawful authority and void ab-initio, thus liable to be set aside.
 - b. That the respondents while dismissing the departmental appeal of the appellant being time barred, vide office order dated 19-10-2020, has failed to take note of the fact that the said office order was not communicated to the appellant. The said order was received by the appellant on 02-09-2020 and thereafter the appellant filed the departmental appeal within the prescribed limitation.
 - c. That the impugned orders have been passed without keeping in view the fact that the service record (Amal Nama) always remain in official custody, hence the appellant cannot access his service record (Amal Nama) and make bogus entries in it.
 - d. That impugned Office Order whereby a major penalty of major penalty of reduction to lowest stage in a time scale is imposed on the Appellant is imposed on the Appellant is passed without holding any inquiry, without giving any show cause Notice, without giving any chance of hearing to the Appellant, without recording any evidence, without confronting the appellant with the alleged bogus entries of passing A-1 exam in 2013 in service record and in

Grounds:

utter disregard of the mandatory provisions of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and Police Rules.

e. That the impugned order whereby a major penalty on the Appellant is against the principles of natural justice as the Appellant is condemned unheard and it is a well settled principle of law that any order which violate the principle of *audi alteram partem* is nullity in the eye of law.

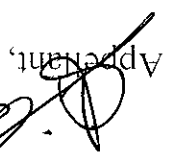
f. That the major penalty of major penalty of reduction to lowest stage in a time scale is imposed on the Appellant without keeping in view the mandate of Rule 4(1)(b)(i) KP Govt Servants (Efficiency & Discipline) Rules, 2011 whereby a major penalty of reduction to a lower stage in a time scale for a maximum period of five years can be imposed only, whereas the appellant is reduced to a lowest stage of constable.

g. That the Appellant craves permission of this Honorable Tribunal to rely on other grounds at the time of arguments and produce any additional document if required in support of his Petition.

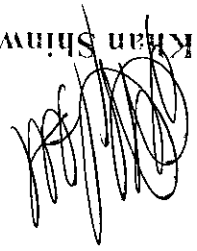
It is, therefore, prayed that on acceptance of this Service Appeal the impugned order dated 26-06-2020 whereby a major penalty of reduction to the lowest stage in time scale is imposed on the appellant and the Office Order dated 19-10-2020 whereby Departmental Appeal of the Appellant is dismissed be set aside and the respondents may kindly be directed to restore the appellant to his original stage in a time scale and all the deductions made from the monthly salary of the appellant be restored/paid to the appellant along with arrears.

Any other relief, which has not been specifically prayed for and deemed fit and appropriate, by this Honorable Tribunal in the circumstances, may graciously be granted.

Through

Appellant,


Muhammad Ayub Khan Shiwari
Advocate Peshawar



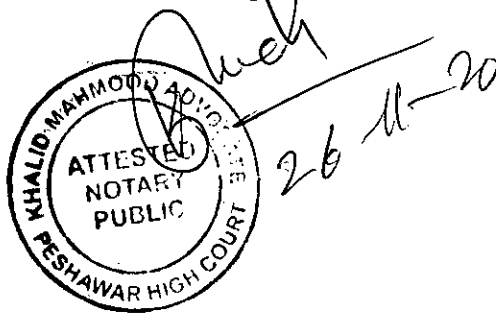
In The Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No _____/2020

Wajid Hayat Versus I.G Police KP & Others

Affidavit

I, Wajid Hayat, Constable No 2884 Frontier Reserved Police, Peshawar do hereby solemnly affirm and declare on oath that the contents of the accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.




Deponent

2384
FRP/PR

O.R.D.E.R.

Annex A 5

This order will dispose of the Departmental Enquiry against Constable Wajid Hayat No.2884 of FRP/PR: Peshawar.

Brief facts of the case are that Constable Wajid Hayat No.2884 submitted form for B-1 exam 2020 while on the record of ETEA office he has failed A-1 examination 2019. As ETEA has informed this office vide letter No. ETEA/2-26/2017/Vol-III/4229-36 dated 27.02.2020 that a candidate is eligible for B-1 exam when he pass A-1 exam and minimum qualification for A-1 exam is 40% i.e 80 out of 200. The said Constable also made bogus entries of passing A-1 exam in 2013 into his service record under the signatory of SP Head Quarters CCPO Peshawar. In this regard, formal departmental proceedings were initiated and DSP/FRP/HQrs Peshawar was nominated as Enquiry Officer. After enquiry, the Inquiry Officer submitted his findings wherein he reported that the said constable was absent in A-1 exam 2019 and submit B-1 form for 2020 exam. The gross miss conduct of Constable Wajid Hayat No.2884 is highly objectionable and recommended for major punishment. He was issued Final Show Cause Notice but his reply was found unsatisfactory. He was also called in Orderly Room to produce any cogent reason in his defence but failed to do so.

In view the aforementioned facts, recommendations of the Enquiry Officer and other material available on record it has come to crystal clear that the said Constable has committed fraud for appearance in B-1 Examination 2020.

Keeping in view the findings narrated above, I, Malik Muhammad Tariq, PSP, Deputy Commandant FRP Khyber Pakhtunkhwa Peshawar being a competent authority is hereby awarded Major punishment of Time Scale to Constable Wajid Hayat No.2884 of FRP Peshawar Range: Peshawar (Bringing to him in lowest stage of constable) under Police Rules 1975 amended 2014 with 14-11-2019 immediate effect. ✓

Deputy Commandant,
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar

No. 927-28 /PA dated Peshawar, the 26 06 /2020.

Copy to the:-

1. Worthy Commandant, FRP Khyber Pakhtunkhwa Peshawar for information please.
2. SP FRP Peshawar Range.. ✓

ATTESTED

عنوان :- درخواست برائے بجالی لہجہ شدہ سروس

بھانہ - عالیہ
گزشتہ درخواستیں بجلی کے مسئلے FRPPR میں لکھنا
کے من سٹیل کے ذریعہ آڈیٹری 927/28/PA کو Time Scale
26/06/20 سے
کی سزا دی گئی ہے۔ جو دفعہ 52 ایچ آر پ کے مطابق ہے
بذریعہ درخواست اس کے مسئلے کے ایک فریب قانداں
سے تعلق رکھتا ہے اور ایسے قانداں کا اولڈ فیمل ہے اور
کوئٹہ ذریعہ عفا نہیں ہے۔ سٹیل کی درخواست پر مشکل
گزشتہ سروس کے لیے اس کے مسئلے کی فہرست بلکہ سزا
عفا کرنے کا حکم صادر فرمائیں

بھانہ وزارت سے

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ان عافیا

ایمان پور خان نیٹیل والا ایف آئی 2384
FRPPR

بھانہ عالیہ
دو لکھنویہ FRP سے تعلق
سے P-52 کا سرو
کی لکھنا
دو لکھنویہ سر مناسبت سے
بھانہ عالیہ
اور فریقہ

Sd/- Forwarded to Gini

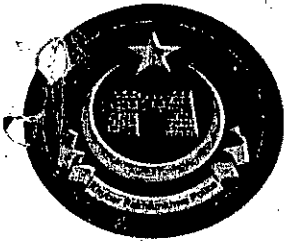
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HO FRPPR
03-09-2020

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31912
RESERVE INSPECTOR
FRP PESHAWAR RANGE
PESHAWAR

Handwritten signature
03-09-2020

ATTESTED



Annex C7

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

No. SI/ 9077 /20, dated Peshawar the 19/10 /2020.

To : The Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.

Office of the Additional Commandant
F.R.P. KPK Peshawar
Jary No. 6940 Encl. 1
Date 19/10/20

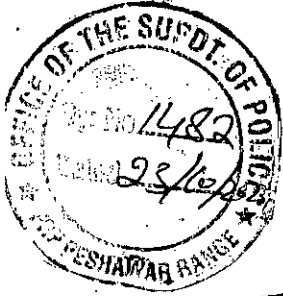
Subject: APPLICATION.

Memo:

Please refer to your office Memo: No. 8603/SI Legal, dated 24.09.2020.

The Competent Authority has examined and filed the appeal submitted by Constable Wajid Hayat No. 2384 against the punishment of time scale Constable (bringing to him in lowest stage of Constable) awarded by Deputy Commandant, FRP, Khyber Pakhtunkhwa, Peshawar vide order Endst: No. 927-28/PA, dated 26.06.2020, being time barred.

The applicant may please be informed accordingly.



DA/SI Legal

[Handwritten signature]

[Handwritten signature]

(SYED ANIS-UL-HASSAN)

Registrar,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

19/10

OFFICE OF THE COMMANDANT FRP, KP, PESHAWAR.

No. 9726 SI Legal, dated Peshawar the 28/10/2020.

copy of the above is forwarded to the SP FRP Peshawar Range, Peshawar for information & further necessary action with direction to inform the applicant accordingly. ✓

[Handwritten signature]
Commandant FRP, KP.
mt

ATTESTED

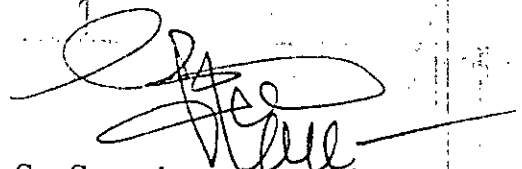
ORDER

Constable Wajid Hayat No. 2384 of FRP Peshawar Range Peshawar was awarded major punishment of time scale by bringing him to the lowest stage of Constable by Dy: Commandant FRP Khyber Pakhtunkhwa, Peshawar vide his office order No. 927-28/PA, dated 26.06.2020.

Now the same order is awarded by Dy: Commandant FRP Khyber Pakhtunkhwa, Peshawar vide his office order endst: No. 9241/SI-Legal, dated 08.11.2021 and his punishment of time scale to the lowest stage of constable is converted into punishment of one year with effect from the issuance of impugned order i.e 26.06.2021.

Hence on expiry of the above said period his scale is restored with effect from 26.06.2021.

Day fixed @ Rs 17000/pm waf 26-06-2021


Sr: Superintendent of Police, FRP,
Peshawar Range, Peshawar

No. 1370 /SRC, dated Peshawar the. 1 6 / 11 /2021.

Copy of above is forwarded for favor information and further necessary action to the Accountant FRP Peshawar Range.

ORDER

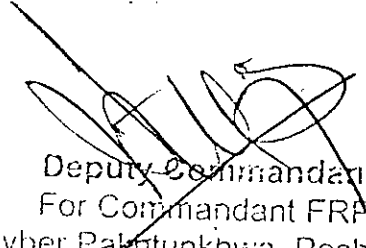
2384 This order will dispose of the application preferred by Constable Wajid Hayat No. 2884 of FRP Peshawar Range against the order issued vide Order Endst; No. 927-28/PA, dated 26.06.2020, wherein he was awarded major punishment of timescale by brining him in the lowest stage of constable. He was proceeded against on the allegations that the above named constable has failed A-1 examination in the year 2019, but submitted B-1 form for examination in the year 2020, conducted by ETEA establishment. After enquiry he was awarded major punishment of timescale by brining him in the lowest stage of constable vide order quoted above.

He appeared in orderly room and contented that he was innocent but punished harshly. He also produced copy of punishment orders of constables concerned to CCP Peshawar, where they were committed with the same nature misconduct and to which they were awarded major punishment of timescale for the period of one year.

According to Constitution of Islamic Republic of Pakistan Article 19-A, all citizens are equal before the law and are entitled to equal protection by the law. Article 25 of the constitution guarantees the equality of all citizens without any discrimination on the basis of gender.

Thus keeping in view the above facts and in the light of natural justice the major punishment of the above named constable is hereby amended and converted into major punishment of timescale for the period of one year, with effect from the issuance of impugned order i.e 26.06.2020. However, he is given stern warning to be careful in future.

Order Announced


Deputy Commandant
For Commandant FRP,
Khyber Pakhtunkhwa, Peshawar.

No 9241 /SI Legal, dated Peshawar the 8 /11 /2021.

Copy of above is forwarded for information and necessary action to the SP FRP Peshawar Range, Peshawar.

Office of the CCF FRP Peshawar

Dy No 1690 08/11/21

Copy to

Att.

SP


CCF FRP Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 15183/2020.

Wajid Hayat Constable No. 2884, Frontier Reserve Police, PeshawarAppellant.

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar & others.....Respondents

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES
1.	Para-wise Comments		03
2.	Affidavit		01
3.	Index		01
Total			05


RESPONDENTS

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 15183/2020.

Wajid Hayat Constable No. 2884, Frontier Reserve Police, PeshawarAppellant.

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others..... Respondents.

WRITTEN REPLY ON BEHALF OF RESPONDENTS.

RESPECTFULLY SHEWETH.

PRELIMINARY OBJECTIONS



1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That the appellant has no cause of action to file the instant appeal.
4. That the appellant has not come to this Honorable Tribunal with clean hands.
5. That the appellant is estopped due to his own conduct to file the instant Service Appeal.
6. That the appellant is trying to conceal material facts from this Honorable Tribunal.

FACTS:-

1. Correct to the extent that the appellant was enlisted in the Police Department as admitted. However, the appellant has involved himself in fraudulent practices, which he deceitfully appeared in the B-1 examination, while he failed to qualify the A-1 examination which is mandatory for appearance in the B-1 examination.
2. Incorrect. As the appellant was found absent in the A-1 examination held in the year 2019, while he fraudulently preferred B-1, Form for appearance in such examination, scheduled in the year 2020. Besides, the appellant was successfully made his bogus entry in his Service Rule as passed A-1 examination. In this regard proper departmental enquiry was conducted against him, wherein the allegations were fully established against him and after fulfillment of all codal formalities he was awarded major punishment of timescale by bringing him in the lowest stage of constable. The penalty imposed upon him has already been announced by the competent authority during the course of personal hearing.
3. Incorrect. The appellant alongwith his other colleagues were fraudulently appeared in the B-1 examination, which the matter was dealt with proper departmentally as the appellant alongwith others were issued Charge Sheet with Statement of Allegations and enquiry officer was nominated. After completion of enquiry the enquiry officer submitted his findings, wherein the appellant and others were found guilty of the charges leveled against him and recommended for suitable punishment. (Copy of enquiry report is attached as annexure "A"). Upon the findings of enquiry officer, he was issued final Show Cause Notice to which he replied, but his reply was found unsatisfactory. (Copies of Show Cause Notice and his reply are attached as annexure "B" & "C"). Moreover, a sufficient

opportunity being heard in person in the light of natural justice was also provided to the appellant, which he availed too, but failed to justify himself. Moreover, the statements of all witness were recorded even the process of cross examination has also been carried out by the enquiry officer, which is placed on file. It is pertinent to mention here that the appellant was proceeded against departmentally under the relevant/special law i.e Police Rules 1975 amended in 2014.


4. Correct to the extent that departmental appeal submitted by the appellant was thoroughly examined and rejected on the grounds of time barred. The appellant was earlier obtained a copy of rejection order well in time.

GROUND:-


- A. Incorrect and denied. The orders issued by the respondents are legally justified and in accordance with law/rules as the appellant was treated in accordance with the relevant/applicable law/rules.
- B. Incorrect. The allegations are false and baseless. As the appellant was well aware from the impugned order of the competent authority as the appellant was participated with whole enquiry proceedings, but he failed to submit his departmental appeal within time.
- C. Incorrect. The appellant has intentionally/fraudulently made bogus entries in his service roll as passed A-1 examination (in 2013) with the consultation of his other colleagues constables and official staff concerned, otherwise he well known the facts that he never qualified the A-1 examination. Furthermore, if he qualified the A-1 examination in the year 2013 so why did he failed to include in the B-1 exam so far despite the facts that A-1 & B-1 examinations are being scheduled/held before the day of 15 March in every year in accordance to standing order No. 14 of 2014.
- D. Incorrect. The instant para has already explained in the preceding para No.3 of facts accordingly.
- E. Incorrect. The impugned order passed by the competent authority is legally justified and in accordance with law/rules. A sufficient opportunity being heard in person in the light of natural justice at every level was provided to the appellant by the enquiry officer and then by the competent authority. Moreover, it is settled proposition of law that law helps the diligent and not the indolent.
- F. Incorrect. The rules produced by the appellant in the para are not applicable to the case of appellant as he is concerned to executive staff of Police Department. It is worth mentioning here that the executive staffs of this department have proceeded against departmentally in accordance with special law i.e Police Rules 1975 amended in 2014. Thus the appellant is correctly treated under the special law of Police Rules 1975 amended in 2014.
- G. The respondents may also be permitted to raise additional grounds at the time of arguments.

PRAYERS:-


Keeping in view the above facts and circumstances, it is most humbly prayed that the instant service appeal being not maintainable may kindly be dismissed with costs please.



Superintendent of Police, FRP
Peshawar Range, Peshawar
(Respondent No. 3)



Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No.2)



Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No.1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 15183/2020.

Wajid Hayat Constable No. 2884, Frontier Reserve Police, PeshawarAppellant.

VERSUS


Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar & others.....Respondents

AFFIDAVIT

I, Ghasan Ullah ASI FRP HQ: do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments on behalf of Respondents No. 1, 2 & 3 is correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court.

ATTESTED




Deponent
Ghasan Ullah
17101-9891560-3