Service Tribunal

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR 16 202

Service Appeal No. 1744/2022.

Naveed Ali Shah, Ex-constable No. 2700, FRP Peshawar Range, Peshawar Appellant.

VERSUS

Provincial	Police	Officer,	Khyber	Pakhtunkhwa,	Peshawar	&
others					Responde	nts.

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RESPONDENTS

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1744/2022.

-Naveed Ali Shah, Ex-constable No. 2700, FRP Peshawar Range, Peshawar Appellant.

VERSUS

PARAWISE REPLY BY RESPONDENTS 1 to 3.

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 and proper parties.
- 3. That the appellant has no cause of action and locus stand 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 the material facts from this Honorable Tribunal.

FACTS:-

- The appellant was appointed as admitted. However, he being a member of disciplined force as well as custodian of public and their property involved himself in a moral turpitude nature offence vide FIR No. 822, dated 03.11.2018 U/S 392/171/109/412/419/420 PPC/ 15-AA, Police Station Daudzai, District Peshawar.
- 2. Incorrect. The appellant robbed/snatched 500 numbers of different sort of Mobiles Phones sets from complainant Noor Ullah and others, which later on recovered from his possession, hence he was arrested and the above criminal case was registered against him by the local police. Besides, he was also remained absent from lawful duty with effect from 02.02.2019 to 27.06.2019 for a long period of (145) days, without any leave or prior permission of the competent authority.
- 3. Correct to the extent that on the allegations of above criminal case as well as willful absence the appellant was placed under suspension and closed to line. The appellant was dealt with proper enquiry as he was issued/served with Charge Sheet alongwith Summary of Allegations, to which he replied, but his reply was found unsatisfactory.
- 4. Incorrect. Proper departmental enquiry was initiated against him as he was issued Charge Sheet alongwith Summary of Allegations and Iltaf Hussain RI

FRP Peshawar Range was nominated to conduct enquiry against him. After completion of enquiry, the Enquiry Officer submitted his findings report, wherein the appellant was found guilty of the charges leveled against him. Upon the findings of Enquiry Officer he was served with Final Show Cause Notice to which he replied, but his reply was found unsatisfactory. Besides, the proceedings of cross examination as well as statement of all witness were also recorded by the Enquiry Officer during the course of enquiry. (Copies of the Charge Sheet his reply, Show Cause Notice and reply alongwith his statement and cross examinations are attached herewith as annexure "A,B,C,D and E"). Furthermore, the competent authority was not agreed with the recommendation of the Enquiry Officer as the allegations leveled against the appellant were already fully established by the Enquiry Officer.

- 5. Incorrect. In fact, the BBA granted to the appellant was subsequently cancelled by the Court concerned and he was arrested and sent behind the bar. However, later on, he was released on bail on the basis of compromise between the parties, but he deliberately failed to join his duty and remained absent from duty for a long period of (145) days without any leave or prior permission of the competent authority. The medical prescription produced by the appellant has already been declared by the Enquiry officer as a shelter, just for covering his prolong absence.
- 6. Incorrect. Upon the findings of Enquiry Officer the appellant was served with Final Show Cause Notice, to which he replied, but his reply was found unsatisfactory by the competent authority.
- 7. Incorrect. As explained in the preceding Para above that on the allegations of criminal case as well as willful absence the appellant was proceeded against proper departmentally and after fulfillment of all codal formalities required as per law/rules the appellant was dismissed from service by the competent authority. Moreover, departmental appeal submitted by the appellant was thoroughly examined and rejected on sound grounds.
- 8. Incorrect. Revision petition of the appellant was rejected with the direction that his criminal case is under trail in the court and after final decision of the said case the appellant shall submit new petition before the Appeal Board.
- 9. Incorrect. The appellant was not honorably acquitted from the above criminal case while the appellant was earlier released from judicial lockup as he patched up the matter with complaint party outside the court and on the basis of which he was acquitted from criminal case. However, his revision petition was reopen, which the appellant was heard in person, but he failed to advance any cogent reason. The enquiry file of the appellant was also perused by the Appeal Board and found that the allegations of criminal case as well as willful absence were fully established by the enquiry officer during the course of enquiry, hence his revision petition was rejected accordingly.

10. Incorrect. The appellant has not come to this Honorable Tribunal with clean hands, hence this appeal being devoid of merits may kindly be dismissed on the following grounds.

GROUNDS:-

- A. Incorrect. The orders passed by the respondents in the case of the appellant are legally justified and in accordance to law/rules as the same were issued after fulfillment of all codal formalities.
- B. Incorrect. Proper enquiry has already been conducted against the appellant as per law/rules. The statement of the appellant was recorded and the procedure of cross examination has already been adopted by the Enquiry Officer during the course of enquiry. Thus such major punishment awarded to the appellant is legally justified and commensurate with the gravity of his gross misconduct.
- C. Incorrect. Perusal of findings of Enquiry Officer reveals that the charges leveled against the appellant were fully established, therefore the competent authority has correctly passed the order of his dismissal from service as per section 05 of Police Rules 1975 amended in the year 2014.
- D. Incorrect. The allegations are false and baseless. As proper departmental enquiry has already been conducted by the Enquiry Officer against the appellant in accordance with law/rules even the statements of all witness were recorded and the allegations leveled against him were fully established by the Enquiry Officer during the course of enquiry and it is evident from enquiry report. Besides, during the investigation the appellant also confessed the offence as reported by DSP investigation. (Copies of enquiry, progress report of investigation officer and detail report of DSP investigation are attached herewith as annexure "G, H & I").
- E. Incorrect. The appellant being a custodian of public and their property, involved himself in moral turpitude nature offence, therefore, he was place under suspension and closed to line for the purpose of departmental enquiry. Proper departmental enquiry was conducted against him under Police Rules 1975 amended in 2014 and the allegations leveled against the appellant were fully established by the Enquiry Officer. According to Police Rules 1975 amended in 2014 the competent authority after perusal of the findings report shall determine, whether the charge proved the authority could awarded minor or major punishment if any deemed appropriate by him.
- F. Incorrect. As during the course of enquiry, the appellant was found guilty of the charges leveled against him and it is pertinent to mention here that departmental and court proceedings are two different entities and can run side by side. Thus the competent authority is correctly finalized the case of the appellant by issuing the order of his dismissal from service.

- Incorrect. In addition to the above criminal case the appellant was also remained absent from lawful duty with effect from 02.02.2019 to 27.06.2019 for a long period of (145) days, without any leave or prior permission of the competent authority. However, in this connection a separate enquiry has been conducted into the matter and a fresh statement of the appellant has also been recorded. It is worth mentioning here that the appellant was arrested by the local Police on 01.02.2019 in connection of criminal case and later on he was released from judicial lockup on 01.06.2019, but he deliberately failed to report arrival and to join his duty and thus he remained absent from lawful duty for a long period quoted above. The medical prescription produced by the appellant rebutted by the Enquiry Officer and declared it as a shelter, just for covering his absence period.
- H. Incorrect. As the matter was already patched up by the appellant with the complainant party outside the court and on the basis of compromise he was acquitted from criminal case. Thereafter, the appellant submitted application for reopen his case, which the appellant was heard in person by the Appeal Board at CPO Peshawar and the record was perused and found that the allegations leveled against the appellant were fully established during the course of enquiry. Besides, all of above the appellant failed to advance any plausible explanation before the Board concerned in rebuttal of the charges. Hence his revision petition was rejected on sound grounds.
- Incorrect and denied. The appellant was absolutely treated in accordance with law within the meaning of Article 4 of the constitution by giving him sufficient and proper opportunities at every level of defense and that the entire proceedings were carried out in accordance with existing laws and rules.
- J. 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 devoid of merits may kindly be dismissed with costs please.

Superintendent of Police FRP,

Peshawar Range, Peshawar

(Respondent No. 03)

Command of FRP,
Khyber Pakhtunkhya, Peshawar

(Respondent No! 02)

Provincial Police Officer,

Khyber Pakhtunkhwa, Peshawar/

(Respondent No. 01)

CHARGE SHEET U/R 6(1)(A) NWFP (NOW KHYBER PAKHTUNKHWA) POLICE RULES 1975.

You Constable Naveed Ali Shah No.2700, posted at FRP/Peshawar Range Peshawar are hereby charged for committing the following Omission/Commissions.

Constable Naveed Ali Shah No.2700 of FRP Peshawar Range, Peshawar being involved in case FIR No.822 dated 03.11.2018 U/S 392-171, 419-420 PPC 15AA also absented himself from lawful duty w.e.from 02.02.2019 till to date without any leave/permission from the Competent Authority.

You are hereby called upon to submit your written defence against the above charged before the inquiry officer.

Your reply should reach to the enquiry officer within (7) days from date of receipt of this charge Sheet, failing with Ex-part proceeding shall be initiated against you.

SUMMERY/STATEMENT OF ALLEGATION

Constable Naveed Ali Shah No.2700 of FRP Peshawar Range, Peshawar being involved in case FIR No.822 dated 03.11.2018 U/S 392-171, 419-420 PPC 15AA also absented himself from lawful duty w.e.from 02.02.2019 till to date without any leave/permission from the Competent Authority. Your reply should reach to the inquiry officer within (7) days from date of receipt of this charge Sheet, failing with Ex-part proceeding shall be initiated against you.

Superintendent of Police, FRP

Peshawar Range, Peshawar

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ر اول ادان لیشل کو بیر ملی شماه میر ۵۶۰۵ میر ۱۹۵۵ میر ۱۹۵۵ میر ۱۹۵۵ میر ۱۹۵۵ میر ۱۹۵۰ میر ۱۹۵۰ میر ۱۹۵۰ میر ۱ 1 de cho والى جارح شي فارم على عروان ورمن م من سائل بر جو الزام ع - سراسر هوت اور من لو عنع -ى له من سلم سے و كوئى برآ مدلى وغيرہ من بن على ہے۔ سوك ولمين لیسی (لول) کے جو میرا ابی کی۔ (3) (1) of sold is the of 2019 and is if we is the cold (3) من اور دونا واقع 70 سے 10 مل طار الل سے سر جمل ساور س اراری اور وق موه که ای بر الحامل بر را بوایول - سی می سامل حبل دیمل) که لیم نفریناً که لیم تیم طافتر ده و کا سول فوکه منم طافته من سال عربی و من کی جے ، جسل سیر تعوالی حزا ہے۔ می کس من سال کے رق کی کرن کرن کی میں تعربی کی سی کو کا بھی کا کا کا بھی مقدمیں کی سیلی کرنے ہے۔ دورون درون رافی نام برول هے ، پر سالان س کے جس ک ہے ، اور ساله س مسل سره لف سزام أن وجان مع رستر ملحله سائل دس خرب دور گرای فاندان مع تعلی دلساع ادر بذر رفاس وستعار ما ع ، كه ما ك عبرى وتؤري داخل دين كه عام عادر CMC 17101-6138915-3 Redel Attested 0303 8583818 5)-22 116/23



FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

- I, Superintendent of Police FRP Peshawar Range Peshawar, as Competent Authority do hereby serve you Constable Naveed Ali Shah No.2700, of FRP/PR Peshawar.
- 1) I. That consequent upon the completion of inquiry conducted against you by SI/Iltaf Hussain FRP/PR for which you were given full opportunity of hearing. On going through the finding/recommendations of the inquiry officer the material available on record and other connected papers I am satisfied that you have committed the following acts/omissions per police rules 1975.

While posted at FRP Peshawar Range, Peshawar is being involved in case FIR No.822 dated 03.11.2018 u/s 392-171 419-420 PPC 15AA and also remained absented himself from lawful duty w.e.from 02.02.2019 to 27.06.2019 for the total period of (145) days without taking leave/permission from the competent authority. Your this act amount to gross miss-conduct and punishable.

- 2) Therefore, I Superintendent of Police FRP/PR Peshawar as competent authority has tentatively decided to impose upon you Major/Minor penalty including dismissal from service under the said Rules.
- 3) You are, therefore, required to Show Cause as to why penalty should not be imposed upon you.
- 4) If no reply to Final Show Cause Notice is received within the fifteen days of it delivered in the normal course of circumstance, it shall be presumed that you have no defense to put in and consequently ex-parte action shall be taken against you.

Superintendent of Police, FRP Peshawar Range, Peshawar.

No. 307/PA, dated Peshawar the 16 / 07 /2019.

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<u>OF INQUIRY AGAINST CONSTABLE NAVEED ALI SHAH NO.2700, CONTAINED</u> SUB RULE 4, OF RULE 5 OF NWFP (NOW KHYBER PAKHTUNKHWA) (E&D)

It has been made to appear before me that accused Constable Naveed Ali Shah No.2796, is primes-faice guilty of the following charges to be dealt with under General Police proceedings contained u/r 5(4) of NWFP Rules (E&D) 1975.

Constable Naveed Ali Shah No.2700 of FRP Peshawar Range, Peshawar being involved in case FIR No.822 dated 03.11.2018 U/S 392-171, 419-420 PPC 15AA also absented himself from lawful duty w.e.from 02.02.2019 till to date without any leave/permission from the Competent Authority.

The act of accused official falls within the ambit of misconduct within the meaning of rules 2 (iii) rules 1975 and is liable to be proceeded with under the General police proceedings, contained in Police Rules 1975.

From the above charge, I am convinced that the said official has ceased to become efficient and it accused of gross misconduct therefore, I Superintendent of Police FRP/Peshawar Range, Peshawar being authorized officer within the meaning of 2(ii) of the said rules nominate enquiry Officer.. RI/Iltaf Hussain FRP/PR to enquiry into the charge, levelled against him.

The enquiry officer after completing all enquiry proceedings, shall forward the verdict/Findings to the undersigned within due dated period of 10-days contained U/S 6 (5) of the rules.

Charge sheet and summary of allegations against the accused officer, are being issued separately, reply where of shall be submitted before the inquiry officer within the period of 07.days from date of receipt.

> Superintendent of Police FRP, Peshawar Range, Peshawar.

No. _ S /PA dated Peshawar Range the 14/02/2019. Copy to:-

enquiry Officer. RI/Iltaf Hussain FRP/PR

Allested 16/2

List pp الرئاساكدا كوركه كانوزاس رئورتون سرطوراف لشر وتوريولشاه مُعِيمَ بِاللَّالَ مِن كِيمَا ور وهروفي هرفون عرف كر الوالم المؤلم المؤلم المؤلم ادزناج، موالی مان ربورا بر مراری بارای با واري ال مع من المروه المروه المروه المروه المرود المرود المرود المروض ا العرى أى روسان مارى كرك من زبير دمني أو ركور تروس أمنه مقراري ع مر ربوروس کے وطابق کنڈل فاؤرہ جوالہ ور 20 روز کافہ موہ میں مرسور من ماہم، میں ماہم کافی میں مرسور من ماہم کا ع مرس کال افر بھوں کا میں منگورہ کو الم ور کوالہ آڈ رع کا اور کوالہ آڈ رع کا الم 15-55 کی میں مرسور من ماہم کا ادروری ادروری ماهن از الف از الف المان می از الف المان می از الفی المان الفی المان الفی المان الفی المان المان الفی المان الم المورت في روشي من في روز الله الموري المورك في المراه الله المراه المرا مَا لَوْ رَفِي الْمِدِ اللَّهِ والحروزي سي مرابع م موان وملر فالوزات على ي جي يدي و فعم فالوزات م المران المالات المالات المالات المالات المالات المالات الموافع المو حدر الوسق المراد على المراد على المراد على المراد على المراد على المراد أَنْ رَسِينَ الزرام مِينَ بِهِ إِنْ إِمَالِي لِنَى رَبِينَ كَانَ مِن كُونَ مِن عَدُورِهِ -و المارون المارون المارون المارون المارون المارون المارون المارون المراون المر عرب المازان المثان المورد عن المال المورد المور عَمْنُ مِنْ فَعَ فِي مَا مُرْ فِي السروروة فِي ظَانُونَ فِي مِنْ مَنْ أَفَاهِ وَ فَيْ مِنْ أَفَاهِ وَ (EU)(D)

برزنك الإك البوراط میں دجاں ہم کھڑا کھاں لوکس کے فجھے اور فیک کر رہا۔ لنٹوے مرورہ سے بر ال مُدُون م الوالات كرواب من ما قد لون كالمائي ويوالات كروالات كروال من ما قد لون كالمائي ويوالات كروالات كروا ولا تادرساری ریز زون بهای برن بر کودار مراق روز کالی برای برای در نافته ع بول رقع میں رپورٹ دوران اور ہو کا ور کو دری درگی سے لعادی البورث ونوك كالى مهر كالحاف هذا اور ما بل 29/10 36/10/20 De view De Ville 10/2 10/1/2 على كيشاءر مالول سي سول وُله فني مربيل سكل بيشاه روام ي في ب of civil - 40 C19 192/PA 67 68 NIS. C. C. 11 اسول لیشاور کی در رسوزی آمنر قوارون به ایجار 1.24 b. où Cevel C1346 est 08 N gu 09/12018-120645 6/68

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ترالزام میں بیان موفاق میں رہنے اور رالزام مسرار کر موفا ہے . ہم مهای میں رس سورال کے لفی ذکر سوراک م 3 / 3. 4، 2 2، 8 رس ى دلالى كىرى بى . كىركىشىكى ماۋرە دىگىر ملزمال كولىي ئەلىي كىرى كىرى ج الن والاس مين اکتين ر فوريز ي أفنه مشامل طريم اور وستها عَافِرْاتِ كَ رَوْسِي مِنْ اسْ مَنْ رَبِرِ بِنِهَا مُرَاسِي مِنْ اللهِ مِنْ اللّهِ مِنْ اللهِ مِنْ اللهِي اللهِ مِنْ اللهِنْ اللّهِ مِنْ اللّهِ مِنْ اللّهِ مِنْ اللّهِ مِنْ اللّهِ مِنْ ال ين عاى تر طر عامل مع جر الوزيون معاجى معاشرى تاره و برا به الودُ ميل ورس كرك برما داع يه طور بهروالم نبور بي علامه ارس وروده موارم والتي طوريم رس سرفاري ولارك - اور مور ر فی دان و مالی کی و فائل کرنا رس کی د فیرداری دی . تدین وزور ه كين كرينه وادور موادور كروادي ك يوفلاف قالون هالون كي الروادي فرور فرزار فرزار مان أبراهان به تا (عفر طاب أور تا e Jeon Minie Louis en just de just de just de la just de just 11120 You 2019

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FRP/1 2700 600 (10 (1) (1) (1) (1) (1) (1) (1) (1) (1) مریافی بیای فاروی فارون مون کرد آس را کورای فارس ایس ایس ایس میانی فارس بیانی فارس میانی فارس میانی فارس میانی دفير والا عامل بعرف اورعى فقر سى بيان سيا مكم مير المث بيم وهزار كوافي العدم الموسى لواس اور عالم ارادى ك سالة بران دے را بول - لوئد دیل ہے۔ به كدوس فقرار فروم دار المد مهم كالعراق الواركلود عالور المرس رم منگون میں سال را معربی میں ایس میا یع . لفرار را میار کردسی اور میں کامی میں ایس میں ایس میں ایس میں اور میں بياند عن وهر من بالولن من كعينات على بروان كعينا في لعرا إلان ری وسے دوس کاراف کی میں کارسالی سٹر ہول کارسال کی دیا Attested مرا دوس عاره ی فرن کیا در جارسرن کو کول وال وال 122 (1008. m) ed) 3/ 201/ 2010 Jehns 80 1/20/ 1/20/ 1/20/ 1/20/ طالم 01/0/ is . Ces Julin proling 25 cm 2/20 ياد في م الوالل كاراله على الم علو اور هو في م وي ع a 3/03/01 203/19 B/1/2 NE e Go / Cielo & cite possed () 09/04/18

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S. E. C'Le C'VI (203/18 1018-10). And Zones juni Se 3 for Sally CCP 303/11/2012 Cm -: Ung · 6 60 (6) (10) Orde CM Dupos Sindi والرجم في قوادول العبراطاسانه وفر طيس ولد عرف سالمه بوسف علم المارة وفر 8 Ousbertison Vira Colo Will Contine وران، اس من فرزو فومرا روس عاملی می لیسی کو بعی بیس ما زا Madred

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service	App	eal No.	1744/2022.						`
Naveed	Ali	Shah,	Ex-constable	No.	2700,	FRP	Peshawar	Range,	Peshawar
	· · · · · · ·						••••••		.Appellant.

VERSUS

Provincial	Police	Officer,	Khyber	Pakhtunkhwa,	Peshawar	&
othersResponder						

AFFIDAVIT

We respondents No. 1 to 3 do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments is correct to the best of our knowledge and belief that nothing has been concealed from this Honorable Court.

Superintendent of Police FRP, Peshawar Range, Peshawar (Respondent No. 03)

Commandant FRP, Khyber Pakhtunkh (A.) Peshawar (Respondent No. 02)

Provincial Police Officer,

Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)

ATTESTE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1744/2022.

Naveed Ali Shah, Ex-constable No. 2700, FRP Peshawar Range, Peshawar Appellant.

. VERSUS

AUTHORITY LETTER

Respectfully Sheweth:-

We respondents No. 1 to 3 do hereby solemnly authorize Mr. Ghassan Ullah ASI FRP HQrs; to attend the Honorable Tribunal and submit affidavit/Para-wise comments required for the defense of above Service Appeal on our behalf.

Superintendent of Police FRP, Peshawar Range, Peshawar (Respondent No. 03) Commandant FRP, Khyber Pakhtunkhwa, Peshawar (Responsent No. 02)

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar. (Respondent No. 01)