

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1617/2022.

Imran Ullah, Ex-constable (No. 6214) of FRP Bannu
.....Appellant.

VERSUS

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

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[Signature]
RESPONDENTS

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1617/2022.

Imran Ullah, Ex-constable (No. 6214) of FRP Bannu
.....Appellant.

VERSUS

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

PARAWISE REPLY BY RESPONDENTS 1 to 4.

RESPECTFULLY SHEWETH.

PRELIMINARY OBJECTIONS:-

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. _____

Dated _____

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:-

1. Para No. 01 is correct to the extent that the appellant was enlisted in this department as admitted. The rest of para is not correct as perusal of his service record reveals that he was remained absent from lawful duty on different occasion for a long period of 541 days previously, which he was awarded different punishments and in this regard there are 01 bad entry with no good entry in his credit.
2. Incorrect. The appellant alongwith others were transferred to FRP Malakand Range on complaint basis vide Order dated 21.12.2021 with the direction to report arrival at his new place of posting on due date i.e 25.01.2022. However, he instead to report arrival on due date remained absent from lawful duty without any leave or prior permission of the competent authority. He reported his arrival on 29.01.2022 and on 04.02.2022 he was proceeded on 03 days casual leave and after expiry of the said leave, he deliberately failed to report arrival and remained absent from lawful duty with effect from 07.02.2022 till to 22.02.2022. In this regard, proper enquiry was initiated against him as he was issued Charge Sheet alongwith Summary of Allegations and DSP Sultanat Khan was nominated as Enquiry Officer. After completion of enquiry, the Enquiry Officer submitted his findings, wherein the appellant was found guilty of the charges leveled against him and recommended for suitable punishment. In the light of recommendation of the Enquiry Officer, he was awarded minor punishment of quarter guard for 03 days and his 15 days absence was treated as leave without pay.
3. Incorrect. As before the confinement to quarter guard, the appellant refused to deposit his cell phone with Muharrar Police Line Kabal, Swat and insisted upon

that he will be allowed to come out time to time from quarter guard for refreshment. He also refused to appear before the competent authority and taken away his quilt/bedding from Police Line Kabal Swat and absented himself vide DD report No. 26, dated 10.03.2022. (Copy of DD report attached as annexure "A").

4. Incorrect. As explained above, the appellant was remained absent from duty vide quoted above and a separate departmental enquiry was initiated against him as he was issued Charge Sheet alongwith Summary of Allegations and DSP FRP HQrs; Sultantant Khan was nominated as Enquiry Officer to conduct proper enquiry against him. After completion of enquiry, the Enquiry Officer submitted his findings, wherein the appellant was found guilty of the charges leveled against and recommended for issuance of Final Show Cause Notice. Upon the findings of Enquiry Officer, he was issued Final Show Cause Notice and served upon him through respondent No. 3, but he neither reported his arrival nor submitted his reply within stipulated period. After fulfillment of all codal formalities, he was awarded major punishment of dismissal from service by respondent No. 04, who was a competent authority being appointing authority. (Copy of enquiry report attached herewith as annexure "B").
5. Incorrect. Departmental appeal submitted by the appellant was thoroughly examined and rejected on sound grounds and a copy of the same has already been endorsed to the appellant vide order Endst: No. 6920-23/SI Legal, dated 29.08.2022. (Copy of rejection order is attached herewith as annexure "C").
6. 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.

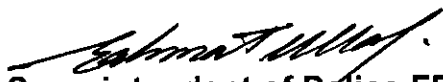
GROUND:-


- A. Incorrect. The stance of the appellant is totally devoid of merit as the appellant was dealt with proper departmentally under the relevant law/rules and after fulfillment of due codal formalities he was awarded major punishment of dismissal from service. The orders passed by the respondents in the case of appellant are legally justified and in accordance with law, hence liable to be maintained.
- B. Incorrect. Sufficient opportunity at every level of defense in the light of natural justice was also provided to the appellant by the respondents, but he deliberately avoided the same.
- C. Incorrect. As the appellant was transferred and posted to FRP Malakand Range Swat on complaint basis and for the purpose of pay he was attached with respondent No.03. According to Standing Order No.02/2014 respondent No.04 (SP FRP Malakand Range, Swat) is competent authority as he is responsible for general administration, welfare and discipline of the strength placed in the region under his jurisdiction.
- D. Incorrect. The Charge Sheet was issued and served upon the appellant on his home address and his tomb impression was obtained as a token of receipt. However, he deliberately failed to submit his reply by avoiding the opportunity of defense. (Copy of Charge Sheet attached herewith as annexure "D").
- E. Incorrect. The Statements of all witness were recorded even the appellant was summoned time and again to join the enquiry proceedings, but he did not turn up.


- E. Incorrect. The Statements of all witness were recorded even the appellat was summoned time and again to join the enquiry proceedings, but he did not turn up.
- F. Incorrect. The Final Show Cause Notice was properly served upon him and his tomb impression was obtained, however, he deliberately failed to submit his reply or to appear before the competent authority. (Copy of Show Cause Notice attached herewith as annexure^{"E"}).
- G. Incorrect. The appellat 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.
- H. Incorrect. The Para has already been explained in the preceding Para above.
- I. Incorrect. The punishment awarded to the appellat is legally justified and in accordance with law/rules. Hence, the Judgment of Apex Court of Pakistan produced by the appellat is not applicable to the case of appellat.
- J. Incorrect. The appellat denied/refused from official duty and absented himself from lawful duty without any valid leave or prior permission of the competent authority. The plea of illness taken by the appellat is not considerable in this stage and he was supposed to have taken this plea before the enquiry officer or before the competent authority during the course of enquiry. Hence, the judgment passed by this Honorable Tribunal in the case of Mr. Fakhar Alam (Appellat) is not concerned to the case of appellat as the same is not at par with the case of appellat.
- K. Incorrect. The Para is not related, however, the respondents are legally obligated to adhere the existence law/rules for maintaining of discipline in the force otherwise the respondent department has no personal grudges against him.
- L. The respondents may also be permitted to raise additional grounds at the time of arguments.

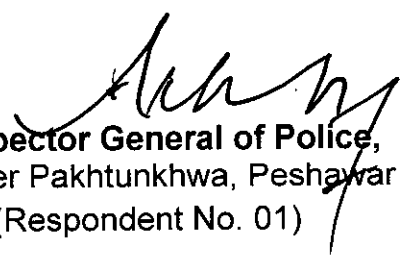
PRAYERS:-

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,
Bannu Range, Bannu
(Respondent No. 03)


Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)


Superintendent of Police FRP
Malakand Range, Swat
(Respondent No. 04)


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)

تسلیم روزنامہ 26
10/03/2022

صالح سوات

55
05-2072

رپورٹ انفاری / غیر جانبداری سے 45:07 بجے 10/03/2022 درج

کنستبلان محمد جیل 7821 عمران 6214 فزکوریس پر لوجہ

حسب حکم آفسران بالا کو الہ 08 بجے 32 فورم 09/03/2022 کئی

3/3 لوجہ کو اسٹریٹ گارڈ کی سزا پر فزکوریس سے بدردن بندش

موبائل فون جمع کرنے سے صاف صاف انفاری کیا جسکی تفتیہ

رپورٹ کو الہ 19 فورم 09/03/2022 درج روزنامہ گنگلی

اب حسب حکم آفسران بالا فزکوریس لفظی لکھی صواب م

دفتر آسرا آباد چاہے کی صورت گنگلی کو متذکرہ بالا ملازمین

دنر روزنامہ میں گواہان تیار کیے 3409 آکٹوبر علی 3578

ساتھ شور خرابا اور دفتر جا سے انفاری کیا اور اپنے معتبر

وساوان لیکر لفظی اجازت سے گھر فور روانہ ہوئے اور بدردن

بدیلت و تباہی کہ ہم گائرنٹ صاحب FRP کو لکھی کہ جسے

روایتی کریں میں برائت کی صواب م صاحب سے درخواست یا اجازت

آپ گائرنٹ صاحب کو لکھیں ہو سکتے ہیں متذکرہ بالا ملازمین نے

ایک بات بھی نہ سنا کر گھر و راستہ اختیار کیا فزکوریس پر نقل غیر درست

اور ایک پولیس آفسر کا مشاہدہ لکھیں ہے جسکی وجہ سے دفتر پولیس

ایڈیٹران پر برا اثر پڑا ہے فزکوریس پر اسے خلاف رپورٹے انفاری / غیر

درج روزنامہ کر کے تعلق لفظی اطلاع مای روزنامہ داران آفسران بالا کی خدمت

میں ارسال ہوگئی

خیابان عالی

ذیل از اول

03 03 22

Sir Farooq
L.O. F.R.P
Mkd: Swat/10/31/22

Sir
Forwarded to
D.S.P. F.R.P
HQ Swat

HL
day stopped
and initiate
the report monthly
proceeding and
nominated as
inquiry officer
insp Sultanat wh

27 FRP / Swat
11/03/2022

Attested
3/0/24

19

محکمہ انکوائری بر خلاف کنسٹیبل عمران اللہ نمبر 6214 حال ان لون پلاٹون نمبر 86 در لوڑ تیر گره

جناب عالی!

معروض خدمت ہوں کہ کنسٹیبل عمران اللہ 6214 نے بصورت تبادلہ آن لون بحوالہ مد 12 روز نامچہ 17-04-2022 پلاٹون 86 میں حاضری کے رپورٹ کی تھی۔ مورخہ 18-04-2022 کو ڈیوٹی سے انکار کرتے ہوئے اپنے مرضی سے چلا گیا تھا۔ جس کے خلاف پلاٹون انچارج نے رپورٹ غیر حاضری اغیر ڈسپلن بحوالہ مد 06 روز نامچہ 18-04-2022 درج روز نامچہ کر کے نقل مد بغرض مناسب حکم افسران بالا کو بھجوا کر کنسٹیبل متذکرہ بالا کے خلاف جناب SP صاحب FRP ملا کنڈرٹنچ سوات نے چارج شیٹ نمبری 26/EC، سٹیٹمنٹ آف الیکیشن نمبری 1329-30/EC مورخہ 21-04-2022 جاری کر کے محکمہ انکوائری کا حکم کر کے انکوائری مجھے حوالہ کیا ہے انکوائری کا غذات موصول ہو کر حسب ضابطہ انکوائری شروع کی گئی۔ چونکہ کنسٹیبل عمران اللہ 6214 بنوں ریجن کا سکوتی ہے۔ مذکورہ کے چارج شیٹ بمع سٹیٹمنٹ آف الیکیشن جناب SP صاحب FRP ملا کنڈرٹنچ سوات نے بحوالہ چھٹی انگریزی نمبری 1339/EC مورخہ 22-04-2022 کو بغرض تعمیل جناب SP صاحب FRP بنوں ریجن بھجوائے گئے تھے۔ جو چارج شیٹ بروقت موصول نہ ہو کر مورخہ 16-05-2022 افسران بالا کو بغرض جاری کرنے رہیمانڈ تحریری استدعا کی گئی۔ مورخہ 17-05-2022 کو جناب SP صاحب FRP نے جناب SP صاحب بنوں ریجن کو چھٹی نمبری 1500-02/EC مورخہ 17-05-2022 جاری کیا۔ مورخہ 26-05-2022 کو دفتر جناب SP صاحب بنوں ریجن سے بوساطت بالا چھٹی انگریزی نمبری 720/FRP-BANNU مورخہ 23-05-2022 بمع تعمیل شدہ چارج شیٹ نمبری 26/EC، سٹیٹمنٹ آف الیکیشن نمبر 1329-30/EC مورخہ 21-04-2022 موصول ہو کر ملاحظہ کرنے پر چارج شیٹ، سٹیٹمنٹ آف الیکیشن متذکرہ بالا کنسٹیبل عمران اللہ 6214 نے مورخہ 13-05-2022 کو وصول کیا ہے۔ چھٹی انگریزی اور تعمیل شدہ چارج شیٹ، سٹیٹمنٹ آف الیکیشن کے نقل شامل انکوائری کی گئی۔

لیکن تا حال کنسٹیبل مذکورہ بالا نے نہ بیان کیلئے پیش ہوا اور نہ ہی چارج شیٹ پر اپنا جواب جمع کیا۔

Attested

3/6/22

3

B/2
جناب والا!

حالات واقعات سے معلوم ہوا کہ کنشیل عمران اللہ 6214 نے ڈیوٹی سے انکار کرتے ہوئے

مورخہ 18-04-2022 کو اپنی مرضی سے چلا گیا ہے۔ جس کے خلاف پلاٹون انچارج نے رپورٹ غیر حاضری/غیر
ڈسپلن بحوالہ مد 06 روزنامہ 18-04-2022 کو درج روزنامہ کیا ہے۔ مذکورہ نے چارج شیٹ، شیمنٹ آف الیکشن
وصول کرنے کے باوجود نہ بیان کیلئے پیش ہوا اور نہ ہی چارج شیٹ پر جواب جمع کیا ہے۔ اس سے یہ معلوم ہوتا ہے کہ کنشیل
عمران اللہ 6214 نوکری کرنے کو تیار نہیں ہے۔ اس کے علاوہ کنشیل عمران اللہ 6214 سابقہ انکوائری میں بحوالہ آرڈر نمبر
1647-50/EC اور OB نمبر 69 مورخہ 25-05-2022 بوجہ غیر حاضری محکمہ سے ڈسمس کیا گیا ہے۔ نقل آرڈر
ہمراہ لف ہے۔ رپورٹ عرض ہے۔

B Lada

انکوائری ایسیر DSP بخت زادہ

ایف۔ آر۔ پی دیویو تیرگرہ

مورخہ 27-05-2022

Sir,

Control Inman no 6214
on loan from PPR Baran
dismissed from service with
this order OB no. 69, dated
25/5/2022 please.

(Signature)

Attest
(Signature)
3/6/22

ORDER

This order will dispose of the departmental appeal preferred by Ex-constable Imran Ullah No. 6214, against the order of SP FRP Malakand Range, Swat issued vide OB No. 69, dated 25.05.2022, wherein he was awarded major punishment of dismissal from service. The applicant was proceeded against on the allegation that he was transferred and posted to FRP Malakand Range vide order Endst; No. 11612-14/OSI, dated 31.12.2021 on complaint basis. But he deliberately failed to report arrival at his new place of posting and remained absent from lawful duty with effect from 07.02.2022 to 22.02.2022 for total period of 15 days, without any leave or prior permission of the competent authority.

In this regard he was proceeded against proper departmentally and after completion of enquiry the Enquiry Officer found him guilty of the charges leveled against him and recommended for suitable punishment. Thus he was awarded 93 days quarter guard and absence period was counted as leave without pay vide OB No. 32, dated 09.03.2022, but he denied to deposit his cell phone with Muharrar FRP Kabal Swat and also insisted upon that he shall be released from quarter guard time to time for refreshment. Later on he taken away his quilts from FRP Police Line Kabal Swat and absented himself vide DD No. 26, dated 10.03.2022.

In this regard, a separate departmental proceedings were initiated against him as he was issued Charge Sheet alongwith Statement of Allegations vide office Endst; No. 19/EC, dated 11.03.2022 and Sultanat Khan DSP FRP HQrs; Swat was appointed as Enquiry Officer to conduct proper enquiry against him. After completion of enquiry the Enquiry Officer found him guilty of the charges leveled against him and recommended for issuance of Final Show Cause Notice.

Upon the finding of Enquiry Officer, he was issued/served with Final Show Cause Notice vide No. 19-A/EC, dated 24.04.2022, and served upon him through SP FRP Bannu Range on 13.05.2022, but he neither reported for duty nor submit his reply of the said notice within stipulated period.

Keeping in view the above narrated facts and other material available on record, he was awarded major punishment of dismissal from service vide OB No. 69, dated 25.05.2022.

Feeling aggrieved against the impugned order of SP FRP Malakand Range, Swat, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 25.08.2022.

During the course of personal hearing, the applicant failed to present any justification regarding to his innocence. From perusal of enquiry file and other record it has been found that allegations of wilful absence were fully established against him during the course of enquiry and also found a habitual absentee. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, I, Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

Order announced in presence of applicant

see for information & intimation

A. K.
Superintendent of Police
FRP, Bannu
8/9

Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.
08/09/2022

No. 6920-22/ISI Legal, dated Peshawar the 29/08/2022.

Copy of above is forwarded for information and necessary action to the:-

1. SP FRP Malakand Range, Swat.
2. SP FRP Bannu Range, Bannu. His Service record alongwith D-file sent herewith.
3. Ex-constable Imran Ullah No. 6214 S/o Abdul Hamid R/o Village Chakdadon, Police Station Ghori Wala, District Bannu.

Advocate
High Court

Handwritten initials/signature

Attested
Handwritten signature
2/1/23

" D "

CHARGE SHEET.

I, **Zafar Khan**, Superintendent of Police, FRP, Malakand Range as a competent authority hereby charged you ^{that} **Incharge Platoon No. 86 Dir Lower** reported that you **Constable Imran No. 6214** reported arrival vide D.D No. 12 dated 17/04/2022 about 19:00 Hrs: you was informed regarding Platoon Duties, but you refused and stated that I will performed may duty on my choice and I will be performed duty on Bady ship. The Incharge Platoon advice you that you will proceed on leave equally to other Employees of the Platoon, but you refused from the said advice and go away from the Roznamcha. Your this act is a **gross misconduct on your part**. In this connection Charge Sheet and statement of allegation are issued to you.

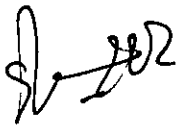
- 1.) By reasons of the above, you appear to be guilty of misconduct and rendered yourself liable to all or any of the penalties specified in Rule-4 of the Disciplinary Rule 1975.
- 3.) You are, therefore required to submit your written reply within 07 days of the receipt of this charge sheet to the Enquiry officer, as the case may be.
- 4.) Your written reply, if any, should reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall follow against you.
- 5.) Intimate whether you desire to be heard in person or not.
- 6.) A statement of allegation is enclosed.

No. 26 /EC

Dated: 21/4/22


Superintendent of Police, FRP,
Malakand Range, Swat

Attached



3/6/23

قرآن الی

6214 Imran

= Imran

= نشان انگوشه

1101-4599828-5

= پلی

0332-9743906

= موبائل نمبر

13-05-22

= تاریخ

DISCIPLINARY ACTION.

I, Zafar Khan, Superintendent of Police, FRP Malakand Range as a competent authority, is of the opinion that he **Constable Imran No. 6214 of this Range, on loan from FRP Bannu Range** has rendered himself liable to be proceeded against departmentally as he has committed the following acts/omissions as defined in Rule 2(iii) of Police Rules 1975, as per Provincial Assembly of Khyber Pakhtunkhwa Notification No. PA/Khyber Pakhtunkhwa/Bills/2011/44905 dated 16/09/2011 and C.P.O, K.P.K, Peshawar Memo; No. 3037-62/Legal, dated 19/11/2011.

D
1/2

STATEMENT OF ALLEGATIONS.

It has been reported that he, while presently posted in Platoon No. _____ committed the following act, which is gross misconduct on his part as defined in Rules 2 (iii) of Police Rules 1975.

That ~~he~~ Incharge Platoon No. 86 Dir Lower reported that you Constable Imran No. 6214 reported arrival vide D.D No. 12 dated 17/04/2022 about 19:00 Hrs: you was informed regarding Platoon Duties, but you refused and stated that I will perform my duty on my choice and I will be perform duty on Bady ship. The Incharge Platoon advice you that you will proceed on leave equally to other Employees of the Platoon, but you refused from the said advice and go away from the Roznamcha.

2. For the purpose of scrutinizing the conduct of the said officer with reference to the above allegations, Mr. Bakht Zada DSP FRP Timergara Dir Lower is appointed as Enquiry officer.
3. The enquiry officer shall conduct proceedings in accordance with provisions of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused officer, record its findings and makes within twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused officer.
4. The accused officer shall join the proceeding on the date, time and place fixed by the enquiry officer.

Superintendent of Police, FRP,
Malakand Range, Swat.

Attested

No. 1329-30/EC, dated Saidu Sharif the 21/04/2022.

21/04/22

Copy of above is forwarded to the:

1. Mr. Bakht Zada DSP FRP, Timergara Dir Lower for initiating proceeding against the accused officer/official namely **Constable Imran No. 6214** under Police Rules 1975.
2. **Constable Imran No. 6214** with the direction to appear before the enquiry officer on the date, time and place fixed by the enquiry officer for the purpose of enquiry proceeding.

11101-4599828-5

= invic

0332-9743906

= مہنگ

13-05-022

= خبر

6214 Imran

= ناقص و عدل سندھ

= نہوٹ

الو عمر ان ال



OFFICE OF THE
SUPERINTENDENT OF POLICE, FRP,
MALAKAND RANGE, SWAT.
Telephone & Fax. 0946-9240258.

FINAL SHOW CAUSE NOTICE.

You Constable Imran No. 6214 on loan from FRP Bannu Range, while posted in FRP Police Lines Kabal Swat absented yourself from your lawful duty vide D.D No. 19 dated 10/03/2022 till to date.

Proper Charge Sheet No. 19/EC, dated 11/03/2022 was issued to you and Mr. Sultanat Khan DSP FRP, HQrs: Swat appointed as enquiry officer to conduct proper departmental enquiry against you.

The enquiry officer, Sultanat Khan DSP FRP, HQrs: Swat conducted proper departmental enquiry against you and submit his findings, wherein he intimated that the above named Constable not yet reported arrival in FRP Police Lines Kabal Swat nor there is no chance in future of his coming for duty.

You are therefore, served with this Final Show Cause Notice to show your position in written within 07 days of the receipt of this notice as to why major punishment as mentioned in Rules-4 of Police disciplinary Rules 1975 should not be imposed on you. Your failure in this respect will be deemed that you have no defence on your part and why ex-parte action will not take against you.

No. 19-A /EC,

Dated. 14/4 /2022.

Superintendent of Police, FRP,
Malakand Range, Swat.
14/04/2022

6214 = Imran
1101-45998285 = ...
0332-9743906 = ...
13-05-22 = ...

Attested
[Signature]
3/6/23

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1617/2022.

Imran Ullah, Ex-constable (No. 6214) of FRP Bannu
.....Appellant.


VERSUS

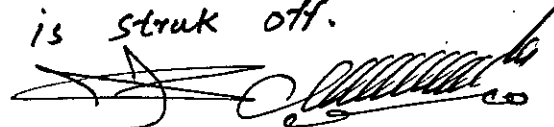
Inspector General of Police, Khyber Pakhtunkhwa, Peshawar &
others.....Respondents.


AFFIDAVIT

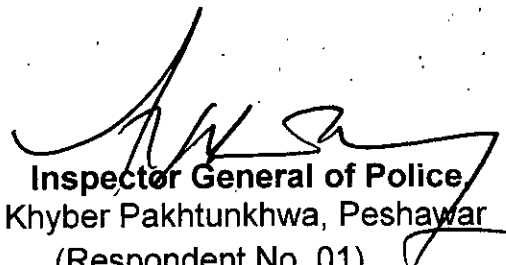
We respondents No. 1 to 4 do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments is correct to the best of our knowledge and belief that nothing has been concealed from this Honorable Court.

It is further stated on oath in this appeal, the answering respondents have neither been placed ex-parte nor their defence is struck off.

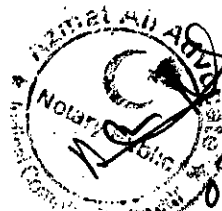

Superintendent of Police FRP,
Bannu Range, Bannu
(Respondent No. 03)


Superintendent of Police FRP
Malakand Range, Swat
(Respondent No. 04)


Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)


Inspector General of Police
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)

ATTESTED



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1617/2022.

Imran Ullah, Ex-constable (No. 6214) of FRP Bannu
.....Appellant.


VERSUS

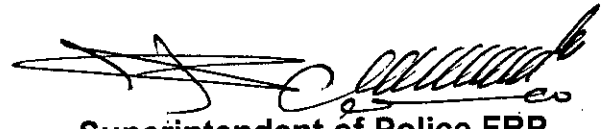
Inspector General of Police, Khyber Pakhtunkhwa, Peshawar &
.....Respondents.
others.....

AUTHORITY LETTER

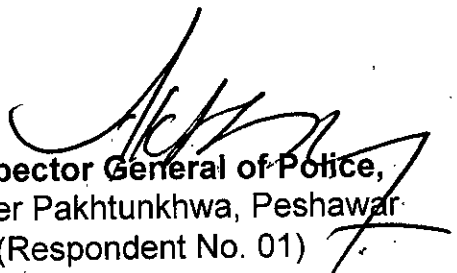
Respectfully Sheweth:-

We respondents No. 1 to 4 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,
Bannu Range, Bannu
(Respondent No. 03)


Superintendent of Police FRP
Malakand Range, Swat
(Respondent No. 04)


Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)