BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Appeal No. 2019/2022

ABDULLAH KHAN

(Appellant)

VERSUS

GOVT. OF KPK & OTHERS

(Respondents)

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DEPONENT

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, Khyber Pakhi Service Trib

Khyber Pakhtakhwi Service Tribunal

Appeal No. 2019/2022

Diary No. 6432

Dated 13/07/23

ABDULLAH KHAN

(Appellant)

VERSUS

GOVT. OF KPK & OTHERS

(Respondents)

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS NO.1 To 5

Respectfully Sheweth

The respondents respectfully submit as under: -

PRELIMINARY OBJECTIONS.

- 1. That the Appellant has got no cause of action.
- 2. That the Appeal is not maintainable under the law.
- 3. That the Appeal is barred by law & limitation.
- 4. That the Appellant has not been discriminated in any way.
- 5. That the Appeal is bad due to mis-joinder and non-joinder of necessary parties.
- 6. That the Appellant has approached the Honorable Tribunal with unclean hands.
- 7. That the Appellant has got no cause of action and locus-standi to file the instant Appeal.
- 8. That the Appellant has been estopped by his own conduct.

BRIEF FACTS:

- 1. Correct to the extent that initially the Appellant was serving in Levis/ Khasadar forceas a constable and subsequently merged in KP Police.
- 2. Incorrect the Appellant was initially absorbed in KP Police as a constable and not as an ASI. Rest of the Para pertains to record.
- 3. Pertains to record hence no comments.
- 4. Correct hence need no comments.
- 5. Correct to the extent that DPO, Bannu sent a letter to Assistant Inspector General of Police (Training) regarding provision of data of HC, Constable/ ASI and Inspector of newly merged Districts for the purpose of demand of vacancies for training purpose and not for verification. (Letter is annexed as annexure. "A")
- 6. Correct to the that the then RPO, Bannu constituted an Enquiry Committee regarding. scrutinizing absorption of members of Levies and Khasadar Force in Bannu Region. The Enquiry Committee scrutinized and dug out all facts of the merger. (Enquiry report is enclosed).
- 7. The merger of the Appellant was found not proper, therefore the services of the Appellant was suspended on 25.11.2021 till arrival of proper verification from Home Department.

- 8. Correct hence no comments.
- 9. Pertains to record hence need no comments.
- 10. Pertains to record hence need no comments.
- 11. Pertains to record hence need no comment.
- 12. Correct to the extent that the Appellant received some certificate due to his duty during Jani Khel agitations.
 - 13. Incorrect DPO Bannu constituted a Scrutiny Committee in order to probe the suspicious/controversial notification regarding absorption of Levis/ Khassadar Police Force as the Appellant along with other 10 colleagues were directly absorbed as ASIs in despite of the fact that, no Scrutiny Committee (comprising DPO, DC/ AG/APA and DAO) had recommended these names for their absorption in the Rank of ASIs. (Enquiry report is annexed).
 - 14. Correct to the extent that in light of the recommendation of the Enquiry Committee the DPO, Bannu issued the impugned order dated 01.09.2022 and reverted the Appellant along with other colleagues from the rank of ASIs to the rank of constable (Being their original Rank).
 - 15. Pertains to record has no comments.
 - 16. Correct to the extent that the Appellant filed writ petition No. 761-B/2022 in Peshawar High Court Bannu Bench. The case was decided with the direction to RPO, Bannu to decide the Appeal within 30 days. In compliance with the order of High Court Bannu Bench the W/RPO, Bannu checked/vetted the subject appeal, but turned down being unplausible and unjustified.
 - 17. Correct to the extent that on the request of DPO, Bannu the Home Department constituted a committee vide notification No. 1498-1503, dated 10.11.2022 to dig out the real facts.

GROUNDS:

- **A.** Incorrect the impugned reversion orders dated 01.09.2022 is not against the law facts and norms of natural justice and material on the record.
- **B.** That the Appellant has been treated by the respondent in accordance with law and Rules on the subject noted above and the Respondent did not violate. Article 04 & 25 of the Constitution of the Islamic Republic of Pakistan, 1973.
- C. Pertains to record has no comments.
- **D.** Pertains to record has no comments.
- E. Incorrect the respondent department did not act in an arbitrary and malafide manner by imposing major punishment of reduction in Rank.
- **F.** Incorrect the impugned reversion order dated 01.09.2022 was not passed in a hasty manner and nor it was against the rule and law/ natural justice.

G. This office may kindly be allowed to advance additional grounds at the time of arguments.

PRAYER:

It is therefore, most humbly prayed that the appealed of the appellant may kindly be dismissed with cost.

District Rolice Officer, Bannu.

(Respondent No. 05)

Regional Police Officer, Bannu Region, Bannu. (Respondent No. 04)

Provincial Police Officer

KP, Peshawar.

(Respondent No. 03)

Deputy Secretary Home & Tribal Affairs, Civil Secretariat, Peshawar.

(Respondent No. 02)

Secretary Home & Tribal Affairs, Civil Secretariat, Peshawar. (Respondent Northary,

Khyber Pakhtunkhwa

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Appeal No. 2019/2022

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(Appellant)

VERSUS

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(Respondents)

AFFIDAVIT.

I MR. Muhammad Farooq Khan DSP Legal Bannu, representative for Respondent No.1 to 5 do hereby solemnly affirm and declare that the contents of the accompanying comments submitted by us are true and correct to the best of our knowledge and belief and that nothing has been concealed from this Honorable Tribunal.

DEPONENT



BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR.

Appeal No. 2019/2022

ABDULLAH KHAN

(Appellant)

VERSUS

GOVT. OF KPK & OTHERS

(Respondents)

AUTHORITY LETTER.

Mr. Muhammad Farooq Khan DSP Legal Bannu, is hereby authorized to appear before Honorable Tribunal on behalf of the undersigned in the above cited Appeal.

He is authorized to submit and sign all documents pertaining to the present Appeal.

District Police Officer

Bannu

(Respondent No.5)

Regional Police Officer, Bannu, Region Bannu (Respondent No.4)

Provincial Police Officer

KP Peshawar.

(Respondent No.3)

Deputy Secretary Home & Tribal Affairs,

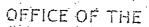
Civil Secretariat KP Peshawar.

(Respondent No.2)

Secretary Home& Tribal Affairs, Civil Secretariat KP Peshawar. (Respondent No. 1)

> Home Secretary, Khyber Pakhtunkhwa

Annexul





DY; SUPERINTENDENT OF POLICE, CANTT CIRCLE, BANNU.

Phone A	lo: 093	2-92702	91.		
No.		<u> </u>	. Da	ated:	/2021.
	•			• "	,. —

-To:

Region Police Officer Sannu Region, Bannu.

Subject.

ENQUIRY

I LEMO.

Kindly refer to your office order NO.2220/EC dated 10-06-2021; Interim report submitted for your kind perusal please

> Dy: Superintendent of Police, Cantt Circle, Banno

Copy of the above is forwarded to

No. 197-200/C elt. 30-6-021

1. SDPO Ruler II.

4. Head cierk, SP investigation office

Nevie

Attented to be The Cappy SALD/1

Dy: Superintendent of Police, Cantt Circle, Banna



The Cammittee comprising of the following officers:-

- (4) Inspector Muhammad Farouq Khan acting SDPO Cantt
- (2) Inspector Rizwan Khan acting SDPO / Rural-II,
- (3) Senior Clerk Javid Khan Head Clerk Investigation Office Bannu

was constituted by order of worthy DIG Bannu Region Bannu vide order No. for the purpose of collecting the entire record in respect of all levies and Khassadar personnel of Sub Division Wazir from DPO Office which is originally sent by APA FR Bannu to DPO Bannu, the record which was sent to the PPO KP and sanctioned/ Notified from Home Department.

The committee obtained the following documents/ information/recommendations from DC Office/DPO Office and sanctions from Home Department. The detail is as under.

The officer recommend by DC / APA Office vide No. 162- 63 -/APA/LC/F-36 dated 17-10-2019 for purpose of absorption in Police Department.

Subject.

ABSORPTIN OF LEVIS + HASSADA 3

	·	•		• • •	
ı		Khasadar		Levies	 Total
	Utmanzai 335		Ahmadzai 441	245	 1021

RECOMMENDATION OF KHASADAR/LEVIES HEAD CONSTABLES AND CONSTABLES FROM DC CEFICE TO DPO BAJ INH VIDE LETTER NO.162-63/APA/LC/F-36 DATED 17,10,2019

HEAD CONSTABLES = 50

CONSTABLES ≈ 900

TOTAL = 950

2. RECOMMENDATION OF HEAD CONSTABLES AND CONSTABLES FROM DPO BANNU VIDE LETTER NO.13608/PA D/:TED 25-11-2019

HEAD CONSTABLES = 50

CONSTABLES = 900

TOTAL = 950

NOTIFICATION OF HEAD CONSTABLES AND CONSTABLES FROM HOME DEPERTMENT VIDE NOTIFICATION NO.472-82 DATED 18-2-2020 AND 483-93 ()ATED 18-2-2020

HEAD CONSTABLES = 4

CONSTABLES = 793

TOTAL = 840

AlterA

GOE,

NOTIFICATION OF HEAD CONSTABLES AND CONSTABLES FROM HOME
DEPERTMENT VIDE NOTIFICATION NO. 2410-20 DATED 16-10-2020 (Service change

HEAD CONSTABLES = 0

CONSTABLES = 57 (Service change)

TOTAL = 6

NOTIFICATION OF HEAD CONSTABLES AND CONSTABLES FROM HOME DEPERTMENT VIDE NOTIFICATION NO.87-97 DATED 08-01-2021 (Service change)

HEAD CONSTABLES = 0

GONSTABLES: = 43 (Service change)

TOTAL = 44

Grant Total = 105

6. <u>DIRECT NOTIFICATION OF CONSTABLES FROM HOME DEPERTMENT VIDE NOTIFICATION NO.691-700 DATED 07-05-2021.</u>

HEAD CONSTABLES = NII

CONSTABLES = 31 (Khasadar)

TOTAL = 3

7. <u>DIRECT NOTIFICATION OF CONSTABLES FROM HOME DEPERTMENT VIDE NOTIFICATION NO.731</u>
39 DATED 07-05-2021

HEAD CONSTABLES = Ni

CONSTABLES = 01 (LEVIES)

TOTAL = 01

8. SERVICE CHANGE PENDING CASES IN HOME DEPERTMENT, KP

TOTAL = 183

9. NEED TO BE ABSORBTION CASES PENDING IN HOME DEPERTMENT, KP

TOTAL = 1

CONCLUSION

Attentice

It is pertinent to mentioned here that interim report in respect of upper subordinate of Levies and Khasadar has already been submitted in the office of RPO Bannu Region Bannu. However, conclusion is reproduced.

Compendium of the above scenario is that the above mentioned police officials from S.fle. 01 -10 are recommended as Constable by the Core committee f.e. DPO Bannu, ADC and Disti Account Officer Bannu, while Home Dept accorded their names in the rank of ASI. Furthermore the name of Saddam Hussain was not recommended by the Core committee while Home Dept included his name in aforementioned notification as ASI.

Moreover the list I all Notifications mentioned above received from Home Dept need verification.

to the reliable to the directions massed by Morring Regional Police Officer. <u>orofi</u>. Three Region, damps side Enther the 50097EC dated 17,11/2021 and in the tight of supplement appropriate of Guell of Whyper Palmenkings, Home and Tribal Affairs. Dupartment vide So SO(Pelice) HD /SMI 2019-Merged Area 691-700 dated 07.05.2021 regarding the absorption of 31 Rhapadars in Palice Force as well as 10 personnel of Ex-Rhasadars Work, notified as Asia vide notification No. Stilpolice) HD /SAU 2019 Morged Area/87/97, Large 88.81/2021 how 5.Ho.01 to 10 and 01 p. reading of Ex-Khasadar notified as ASI vide notification tip, toppolicel HD JSMI 1819 Merged Arce/2410-29, deced 16 10.7070 at 5,80.05 in concrevention to the schedule (Rule-3(b)) of KP Resease Absorption Rules Act 2019 witch needs to be properly verified from the Mome Department Reshawas. The services of all the personnel under notification Ho, mentioned above are haraby suspended as well as made non-functional fill the arrival of proper ventication from Home Dogartment Positiver with immediate effect.

oc na. <u>13.71</u>

Obted 25 / 1/1/2021

District Police Officer, Bangu. '

8236 / dated, Sernu the 25 / 11 /2021 No.

Copy of above is submitted to the Regional Police Officer, Bannu Region, Bannu wir to his office Endst, No. quoted above.

All concerned for necessary action.

District Folice Officer. $\mathcal{B}gun_{2},$

Attend

Ballot Co

ORDER:

In compliance with the directions issued by Worthy Regional Police Officer, Bannu Region Bannu vide Endst: No. 5609/EC dated 17.11.2021 and in the light of suspicious notification of Govt: of Khyber Pakhtunkhwa, Home and Tribal Affairs Department vide No. SO (Police) HD/SMI 2019 Merged Area 691-700 dated 07.05.2021 regarding the absorption of 31 Khasadar in Police Force as well as 10 personnel of Ex-Khasadar were notified as ASIs vide Notification No. SO (Police) HD/SMI 2019 Merged Area 87-97, dated 08-01-2021 from S. No. 01 to 10 and 01 personnel of Ex-Khasadar notified as ASI vide Notification No. SO (Police) HD/SMI 2019 Merged Area 2410-20, dated 16-10-2020 at serial No. 05 in contravention to the schedule (Rule-3(b)) of KP Khasadar Absorption Rules Act 2019 which needs to be properly verified from the Home Department Peshawar. The services of all the personnel under notification No. mentioned above are hereby suspended as well as made non-functional till the arrival of proper verification from Home: Department Peshawar with immediate effect.

OB No. 1371

Dated 25/11/2021

District Police Officer,

Bannu.

No. 8836/dated, Bannu the 25/11/2021

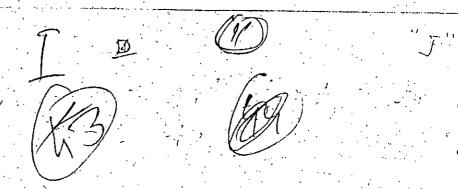
Copy of above is submitted to the Regional Police Officer, Bannu Region, Bannu w/r to his office Endst: No, quoted above.

2. All concerned for necessary action.

District Police Officer,

Bannu.

ORDER



Region, Bannu vide Endst: No.5609/EC dated 17.11.2021, a committee comprising of Mr. Rizwan Khan, SDPO Rural Circle-II Bannu and Mr. Javed Iqbal, Head Clerk of this office is hereby constituted for the purpose to carry out verification of the following notifications received to this office from Home & Tribal Affairs Department, Khyber Pakhtunkhwa Peshawar regarding absorption of Ex-Khasadar/levies Force in Police:

1. No. SO(Police) HD /SM/2019 Merged Area 2410-20 dated 16.10.2020

. No. SO(Police) HD /SM/2019 Merged Area 87-97 dated 08.01.2021 (54 individuals)

SO(Police) HD /SMY2019 Merged Area 691-700 dated 07.05.2021(31 individuals)

District Police Offi Bannu

9004-8 . Idated, Bannu the 0/1 17/2021.

Copy of above is submitted for favour of information to:

The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar

The Regional Police Officer, Bannu Region, Bannu w/r to his office En 3609/EC dated 17.11.2021.

he Section Officer Levies & Khasadar, Home & Tribal Affairs De hyber Pakhtunkhwa Peshawar.

re committee members for necessary action and compliance.

Abuted

Morre to 116

Dietrict Poli

ORDER

La Biller LAD D

In compliance with the directions of Regional Police Officer, Bannu Region Bannu vide Endst: No. 5609/EC dated 17.11.2021, a committee comprising of Mr. Rizwan Khan, SDPO Rural Circle-II Bannu and Mr. Javed Iqbal, Head Clerk of this office is hereby constituted for the purpose to carry out verification of the following notifications received to this office from Home & Tribal Affairs Department, Khyber Pakhtunkhwa Peshawar regarding absorption of Ex-Khasadar/Levies force in Police:

- 1. No. SO (Police) HD/SMY 2019 Merged Area 2410-20 dated 16.10.2020.
- 2. No. SO (Police) HD/SMY 2019 Merged Area 87-97 dated 08.01.2021.
- 3. No. SO (Police) HD/SMY 2019 Merged Area 691-700 dated 07.05.2021 (31 individuals).

District Police Officer
Bannu

9004-8/dated, Bannu the 01/12/2021.

Copy of above is submitted for favour of information to:

- 1. The Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
- 2. The Regional Police Officer, Bannu Region Bannu w/r to his office Endst: No. 5609/EC dated 17.11.2021.
- 3. The Section officer Levies & Khasadar, Home & Tribal Affairs Department, Khyber Pakhtunkhwa Peshawar.
- 4. The Committee members for necessary action and compliance.

District Police Officer

Bannu

GOVERNMENT OF KHYBER PAKHTUNKHWA
Home & Tribal Affairs Department

No. SO(Folice)HD/SMY 2019/ Merged Area/ 1353-36 Dated: 06:12.2021

District Police Officer, Bannu Sub Division.

Starcett

ORDER

Lam directed to refer to your office order No. 9004-8 dated 01.12.2021 and to cor vey that the Committee comprising of Mr. Rizwan Khan SDPO Rural Circle-II Bannu and Mr. daved local Head Clerk DPO Bannu office visited the office of Section Officer (Levy & Khassadars) Home & Tribal Affairs Department for the purpose. The Committee was provided relevant record pertaining to the below mentioned Notifications and verified the same:

- 1. No. SO(Police)/HD/SMY-2019/Merged Area/2410-20 dated 16:10.2020.
- 2. No. SO(Police)/HD/SMY-2019/Merged Area/87-97 dated 08.01.2021.
- 3. No. SO(Police)/HD/SMY-2019/Merged Area/691-700 dated 07.05.2021.

Section Officer : (Levy & Khassadar)

Endst No. & date even. Copy to the:

1. Regional Police Officer Bannu Region, Bannu.

2. PS to Secretary Home & TAs Department, Khyber Pakhtunkhwa.

3. PS to Special Secretary-II, Home & TAs Department, Khyber Pakhtunkhwa

4. Master File.

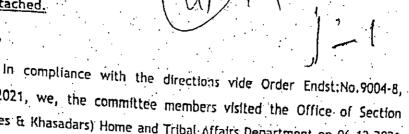
Attact

Section Officer (Levy & Khassadar)

(1122)

eference Attached.

Respected Sir.



dated 01.12.2021, we, the committee members visited the Office of Section Officer (Levies & Khasadars) Home and Tribal Affairs Department on 06.12.2021 for the purpose to verify the following suspicious notifications of Home Department regarding absorption of Ex-Khasadars/ Levies force in Police Force.

- 1. No.SO(Police)HD/SMY 2019 Merged Area/2410-20 dated 16.10.2020 (65 individuals).
- 2. No.SO(Police)HD/SMY 2019 Merged Area/87-97 dated 08.01.2021 (54 individuals)
- 3. SO(Police)HD/SMY 2019 Merged Area/691-700 dated 07.05.2021 (31 individuals)

The verification process was carried out as follows:

- Dispatch register of the office of Section Officer (Levies & Khasadars) Home Department was checked with regard to the numbers issued depicted on the notifications which were found correct.
- Every single notification received in this office from the Home Department was comparatively checked by name of individuals as well as their designation/ ranks and dispatched numbers which were found correct.
- An authentication letter regarding verification of these notifications was also obtained from the Office of the Section officer (Levies & Khasadars) Home Department, placed on file.
- Attested photocopies of all the three notifications were also obtained from the Section Officer office (Levies & Khasadars) Home Department, placed on

Report is submitted please.

Attent en

Javed Igbal) S.Clerk, Head Clerk

to DPO Bannu.

SDPO Rural-II

Circle Bannu.

OFFICE OF THE DISTRICT POLICE OFFICER, BANNU.

Copy of committee report is submitted to the Regional Police Officer, Bannu Region, Bannu with regard to the verification of above suspicious notifications from the office of Section Officer office (Levies & Khasadars), Home & Tribal Affairs Department Khyber Pakhtunkhwa Peshawar alongwith relevant record for perusal and order w/r to his office Endst:No.5609/EC, dated 17.11.2021, please.

District Police Officer.

Bannu.

The Regional Police Officer, Bannu Region, Bannu-



The District Police Officer, Bannu

/EC, dated Bannu, the 2 3 /02/2022

ubject:

ORDER/VERIFICATION OF SUSPICIOUS NOTIFICATIONS FROM HOME & TRIBAL AFFAIRS DEPARTMENT KP

demo:

Reference your office letter No.1051/SDW dated 17.02.2022.

After perusal of the case, the Regional Police Chief has recorded the following remarks on it;-

> "As they have been lawfully absorbed in Police Department in BS-11 by Home Department, therefore proceed as per law on the subject".

> > (OFFICE SUPDI:)

For Regional Police Officer, Bannu Region, Bannu

SRC (SDW)

For information &

Maclien.

District Police Officer

24/02/2022

Atalted

ORDER

In compliance with Regional Police Officer, Bannu Region, letter No.793/EC, tlated 23.02.2022 and in the light of proper verification carried of the Office of Section Officer (Levies & Khasadars) Govt: of Khyber Pakhtunkhwa, and Tribal Affairs Department vide his office letter No. SO(Police) FID /SMY 2019 /N Area/ 1333-36, dated 06.12.2021 of the suspicious notifications vide No. SO(Police) /SMY 2019 Merged Area/ 691-700, dated 07.05.2021 regarding the absorption Khasadars in Police Force as well as 10 personnel of Ex-Khasadars were notified as vide notification No. SO(Police) HD /SMY 2019 Merged Area/87-97, dated 08.01.202; S.No.01 to 10 and 01 personnel of Ex-Khasadar notified as ASI vide notification SO(Police) HD /SMY 2019 Merged Area/2410-20, dated 16.10.2020 at S.No.05, the se of all the personnel under notification Nos, mentioned above are hereby restored as w made functional from the date of suspension i.e. dated 25.11.2021 with immediate effect

OB No. 267 **
Dated 24 102 /2022

District Police Officer, Bannu

Phone No: 0928-9270038.

Fax No: 0928-9270045

Email:dpobannu2@gmail.com

No. 1270-74 /SRC(SDW) dated Bannu the, 25/2/2022.

Copy of above is submitted to the Regional Police Officer, Bannu Region, Bannu w/r to his office letter No. quoted above.

2. All concerned for necessary action.

Affected More to 146

District Police Officer, Bannu

(Company of the comp

In the light of above names of Asis Saddam H struck off from this District Police and their salaries are stopped immediately and to recover. through legal means, while the following officials are reverted to their original Ranks as below and should be proceeded departmentally: 1000

:: #	Name of official	Present Runk	Reverted to the Rank as mentioned in Home Department Notification No. SOr (Police)HD/SMY 2019 Merged Area/483-93, dated 18.02.2020
]	Flamayun Khan s/o Rawai Khan	ASI	HC (BPS-09)
3	Abdullah s/o Abdul Janan		HC (BPS-09)
3	Hassan Gul s/o Adam Gul	<u> </u>	B- Constable (BPS-07)
:1	Shah HUssain s/o Akhta: Munir	-do-	Constable (BPS
5	Mukhtar Ullah s/o Mashat Khan	· do-	Constable (BPS
6	Javid lebel s/o Daud Khan	· -do-	Constable (BPS
7	Hafiz Rehman s/o Nazar Gul	do-	Constable (BPS
	Mushabid ul Wadood s/o Fazal Wadood	-d'o-	Constable (BPS
9	Rahmat Ali s/o Zakim Khan	do-	Constable (BPS

Moreover, any consequential proceedings after their appointment notification/orders as ASIs is void Ab initio, and considered to be withdrawn.

O.B NO. <u>944</u>

dated: 6 / /09/2022.

District Police Officer Baunu,

No. 3897 - 3906 dql 1. 01/09/2022

Copy of above is submitted to:

- 1. The Regional Police Officer Bannu Region, Bannu for favor of information. 2. The Deputy Inspector General of Police HQr CPO, Peshawar, for favor of information.
- 3. The Assistant Inspector General of Police Establishment CPO, Peshawar.
- 4. The Assistant Inspector General of Folice (NMDs) CPG, Reshawar
- 5. The Additional SP Bannu Chairman Inquiry Committee constituted vide this office Order No.3639-42 dated11.08.2022.
- 6. The District Accounts Officer, Bannu
- 7. Head Clerk DPO Office, Bannu.
- 8\SRC/OHC SDW, Bannu
- 9. SRÇ/OHC District Bannu.
- 10. Pay Officer

For necessary action and correction of record

Albert