

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 1499/2022**

**Zafar Iqbal Ex Constable FRP, No. 7373 Bannu, Range Presently Basti Sher Pao Abad,  
Near Madina Colony Dera Ismail Khan..... Appellant.**


**VERSUS**

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

**Index**

<b>S.No</b>	<b>Description of Documents</b>	<b>ANNEXURE</b>	<b>PAGE No</b>
1.	Para-wise comments		04
2.	Copy of show Cause Notice	A	05
3.	Rejection Order	B	06
4.	DD report dated 26-12-2019	C	07
5.	Previous Punishments	D,E,F	08-10
6.	Affidavit		11
7.	Authority Letter		12
	<b>Total Pages:</b>		<b>12</b>

Dated: / /2023.

  
**Deponent**

Inspector Javed Khan  
CNIC No.12103-7159785-3

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 1499/2021.**

**Zafar Iqbal, Ex-FC No. 7373, FRP Bannu Range, presently Basti Sher Pao Abad,  
Near Madina Colony Dera Ismail Khan .....Appellant.**

**VERSUS**

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

**PARAWISE REPLY BY RESPONDENTS 1 to 3.**

**RESPECTFULLY SHEWETH.**

**PRELIMINARY OBJECTIONS:-**

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 6514

Dated 17/07/23

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. Needs no comments.
2. Pertains to record hence needs no comments.
3. Incorrect. The appellant remained absent from lawful duty with effect from 19.07.2019 to 08.08.2019 & 09.08.2019 till the date of dismissal from service i.e 16.01.2020 for a long period of 05 months and 27 days, without any leave or prior permission of the competent authority. Thus he was issued Charge Sheet alongwith Summary of Allegations and Enquiry Officer was nominated to conduct proper enquiry against him. After completion of enquiry, the Enquiry Officer submitted his findings report. Upon the findings of Enquiry Officer, the appellant was issued Final Show Cause Notice and served upon him on 25.12.2019 through special messenger on his home address and his signature was obtained as a token of receipt on duplicate copy, but however, he failed to submit his reply within stipulated period. After fulfillment of all codal formalities, he was awarded major punishment of dismissal from service as per law/rules. (Copy of Show Cause Notice attached herewith as annexure "A")
4. Incorrect and misleading. The appellant was duly provided opportunity of personal hearing in orderly room held on 23.07.2020 by the appellate authority. However, the appellant failed to present any justification regarding his prolong

absence. Therefore, the appeal was reject being no substance & by being meritless.

5. Incorrect. The mercy petition submitted by the appellant was thoroughly examined in the light of Police Rule 16.32 and rejected on the ground of being time barred.
6. Incorrect. As the appellant well known from enquiry proceedings as well as impugned order dated 16.01.2020, however, the appellant is trying to concealed the actual facts from this Honorable Tribunal. In fact after dismissal from service the appellant was involved himself in a moral turpitude nature offence vide FIR No. 207, dated 17.02.2020, U/S 11B-CNSA, Police Station Cantt; District DI Khan and in this regard he was arrested by the local police from the spot with red hand. Thus he submitted his departmental appeal in very belated stage and which was rejected on sound grounds and a copy of which has already been conveyed to the appellant on his home address vide this office order Endst; No. 5879-80/EC, dated 29.07.2020. Thereafter, the appellant submitted a mercy petition before the respondent No. 04 i.e Inspector General of Police, which was thoroughly examined and rejected on the ground of time barred vide order No. S/1244/21, dated 24.03.2021, which the appellant was informed by the respondent No. 07 on 05.04.2021 accordingly. (Copy of the order dated 24.03.2021 attached as annexure "B").

**GROUND:-**


- a) Incorrect. The appellant has been absolutely treated in accordance with law within the meaning of Articles <sup>04</sup> of the Constitution of <sup>Islamic</sup> Republic of Pakistan by giving him sufficient and proper opportunity at every level of defense and that the entire proceedings were carried out in accordance with existence law and rules.
- b) Incorrect. The appellant remained absent from his lawful duty for a long period of 05 months and 27 days, without any leave or prior permission of the competent authority. Thus, he was issued Charge Sheet alongwith Summary of Allegations and Enquiry Officer was nominated to conduct proper enquiry against him. After completion of enquiry, the Enquiry Officer submitted his findings report. Upon the finding of Enquiry Officer, the appellant was issued Final Show Cause Notice and served upon him on 25.12.2019 through special messenger on his home address vide daily diary report No. 12, dated 26.12.2019 (Copy of DD report attached herewith as annexure "C"). However, the appellant did not bother to submit his written reply of Charge Sheet or appear before the Enquiry Officer, despite the fact that he was summoned by the Enquiry Officer time and again, meaning thereof that the appellant was no more interested in the service of Police department. Thus after fulfillment of all

codal formalities the appellant was awarded major punishment of dismissal from service as per law/rules.


- c) Incorrect. During the course of enquiry the appellant was deliberately failed to join enquiry proceedings or to submit his reply of Charge Sheet as well as Final Show Cause Notice issued to him and remained absent for a period of more than 05 months. The appellant has been provided opportunity of personal hearing, however he failed to present any justification for his prolong absence. Thus neither the malafide act on the part of respondents is involved nor the constitutional right of the appellant withheld.
- d) Incorrect. Already explained vide above Para.
- e) Incorrect. As the appellant being a member of disciplined Force remained absent from his lawful duty for long period of 05 months and 27 days, without any leave or prior permission of the competent authority and the matter was dealt with proper enquiry. After completion of enquiry the Enquiry Officer submitted his findings, wherein he reported that defaulter official (appellant) is a malingering type and habitual absentee and seems to be not interested to continue further service. Thus the Enquiry Officer found him guilty of the charges leveled against him and recommended for major punishment. Besides, perusal of his service record reveals that in past he also remained absent from his lawful duty for a long period of 527 days on different occasions, to which he awarded different punishment including major punishment of time scale by bringing him in initial stage of constable. (Copies of previous punishments orders are attached herewith as annexure "D", "E", & "F" respectively). Moreover, with regard to departmental appeal the appellant was summoned and heard in person in Orderly Room held on 23.07.2020 by the appellate authority, but he failed to present any justification regarding his prolong absence. Thus, the appellant was absolutely treated in accordance with law/rules.
- f) Incorrect. Already explained vide Para of Ground "C".
- g) Incorrect and misleading. The appellant has been dealt departmentally for his long absence of 05 months & 27 days. Besides, the appellant has on his credit absence of total 527 days involving major penalty, which speak values of the conduct of the appellant at very initial stage of constabulary.
- h) 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. 07 & 08)




**Deputy Commandant FRP,**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 06)




**Commandant FRP,**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 05)



**Inspector General of Police,**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 03 & 04)



**Secretary Home & Tribal Affairs,**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 02)  
**Home Secretary,**  
Khyber Pakhtunkhwa



**Chief Secretary Government,**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 01)

"A"

(S)

No. 1760

Dated, 26/11/2019

**FINAL SHOW CAUSE**

I, **Kifayat Ullah Khan Wazir**, Superintendent of Police, FRP Bannu Range, Bannu as competent authority, under Rule 5(3) of the Khyber Pukhtunkhwa Police rules (As amended vide Khyber Pukhtunkhwa gazette Notification, No.27<sup>th</sup> of August 2014) for the following misconduct hereby serve upon you Constable **Zafar Iqbal No. 7373** this final show cause notice.

- That Constable **Zafar Iqbal No. 7373** has absent himself from lawful duty without any sanctioned leave or prior permission of the competent authority vide DD No. 26 dated 19-07-2019 to 08-08-2019 & 09-08-2019 to till date at FRP Police Line II Bannu. His pay was stopped to this effect.
- Such act on your part is against service discipline and amounts gross misconduct/ negligence in duty.

That consequent upon the completion of enquiry conducted through enquiry officer FRP, Bannu submitted findings report and reported that the allegations contained in the charge sheet have fully been proved against the defaulter Constable **Zafar Iqbal No. 7373** is proved.

As a result, I, as a competent authority, have tentatively decided to impose upon you one for more punishments including dismissal as specified the rules.

You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you.

If no reply to this notice is received within seven days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

The copy of the findings of the Enquiry Officer is enclosed.

Lakki  
 Lo / Aslam Khan  
 for written enquiry  
 and Sanjida / Si / PC  
 → Transferred  
 [Signature]

[Signature]  
 (KIFAYAT ULLAH KHAN WAZIR), PSP  
 Superintendent of Police,  
 FRP, Bannu.

Master  
 [Signature]

"B" (6)

ORDER

( This order will dispose of the departmental appeal preferred by ex-constable Zafar Iqbal No. 7373 of FRP Bannu Range, against the order of SP FRP Bannu Range, Bannu issued vide OB No. 29, dated 16.01.2020, wherein he was awarded major punishment of dismissal from service. The applicant was proceeded against on the allegations that he absented himself from lawful duty with effect from 19.07.2019 to 08.08.2019 & 09.08.2019 till the date of dismissal from service i.e 16.01.2020 for a period of 05 months 27 days, without any leave or prior permission of the competent authority.)

In this regard, he was issued Charge Sheet alongwith Summary of Allegations and SI/PC Sami Ullah Khan was nominated as Enquiry Officer to unearth the actual facts. A discreet probe was made by the Enquiry Officer and submitted his findings, wherein he reported that the Charge Sheet was not received by the official, subsequently a Final Show Cause Notice of major punishment including dismissal from service was issued, which was properly served upon him on 25.12.2019, but he did not reply to the said notice.

Finally Enquiry Officer submitted his report dated 14.01.2020, wherein defaulter official to have willful and habitual absentee malinger type official and seems to be not interested to continue further service.

After perusal of his service record, it has been found that in past he remained absent from duty for a long period of 527 days on different occasions, to which he awarded different punishment i.e major punishment of time scale by bringing him in initial stage of constable and his absence period was treated as leave without pay etc. Finally he was rendered guilty for the allegations leveled against him and recommended for imposition of major punishment.

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. 29, dated 16.01.2020.

Feeling aggrieved against the impugned order of SP FRP Bannu Range, Bannu, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 23.07.2020.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. From perusal of enquiry file it has been found that the allegations were fully established against him by the enquiry officer during the course of enquiry. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force. Therefore any leniency or complacency would further embolden the accused officer and impinge upon the adversely on the over all discipline and conduct of the force. It is settled proposition of law that law helps the diligent and not indolent. Thus there doesn't seem any infirmity in the order passed by the competent authority, therefore no grounds exist to interfere in same.

(Based on the findings narrated above, I, Malik Muhammad Tariq PSP, Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected/dismissed being meritless.)

SRE Order Announced.

information and action.

Attested  
[Signature]

[Signature]  
4/3.

872  
04/07/20

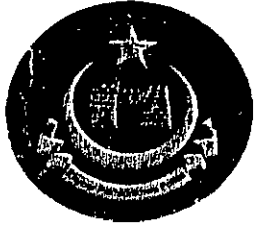
[Signature]

Deputy Commandant  
For Commandant FRP  
Khyber Pakhtunkhwa, Peshawar.

No 5879-80 /EC, dated Peshawar the 29/07/2020.

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

1. SP FRP Bannu Range, Bannu. His service record and D file sent herewith.
2. Ex- constable Zafar Iqbal No. 7373 S/o Javid Iqbal R/o Basti Sher Pao, Police Station Cantt, District DI Khan.



(7) 'B' 'C'

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

No. SI/ 1294 /21, dated Peshawar the 24/01/21

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

Subject: REVISION PETITION.

Memo:

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
No. 2091  
Date 24-3-21

The Competent Authority has examined and filed the revision petition submitted by Ex-FC Zafar Iqbal No. 7373 of FRP Bannu against the punishment of dismissal from service awarded by SP/FRP, Bannu vide OB No. 29, dated 16.01.2020, being badly time barred.

The applicant may please be informed accordingly.

433  
29/3/21

S/ Legal

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

SRE

[Signature]

18/3

Office of Commandant FRP KP, Peshawar  
dis No 2783 /SI legal, dated Peshawar on 10/3/2021

copy of above is forwarded to the SP FRP Bannu Ram,  
Bannu for information and further necessary action

Attested

[Signature]

SRE  
Informed to concerned applicant  
and in action

[Signature]  
15/4

[Signature]  
For Commandant FRP  
Peshawar



**ORDER:-**

This Order will dispose off departmental enquiry conducted against Constable Zafar Iqbal No.7887/FRP, of FRP, D.I.Khan Range, on the Charges that according to daily diary report Mad No.31, dated 07.08.2014, of Police Station City District D.I.Khan, he absented himself from law-full duties with effect from 07.08.2014 t with out any leave or permission. On 20.10.2014 he reported back for duty vide daily diary report Mad No.40, dated 20.10.2014 of Police Station City D.I.Khan.

On the basis of above, he was served with Show Cause Notice. He was required to submit his reply with in stipulated period of (07) days of its rec but he failed to do so. He was proceeded against departmentally and served with proper Charge Sheet and Statement of allegations. **SIRUSTAM KHAN**, was appointed as Enquiry Officer. After completion of all codal formalities, the Enquiry Officer submitted his finding report along-with other relevant papers, where in he stated that defaulter Constable was time and again summoned to record his statement and also for completion of Departmental proceedings but he did not attended the Enquiry proceedings. Hence the Enquiry Officer submitted his finding along with all the enquiry papers for taking appropriate action. He was enlisted on 30.07.2007. During short period of service he remained absent for a period of (179) days previously.


Keeping in view the facts stated above, as well as finding report of Enquiry Officer, **I MR. SANA ULLAH KHAN MARWAT**, Superintendent of Police FRP D.I.Khan in exercise of powers conferred upon me under NWFP Police Rules 1975 by taking ex-parte action hereby award **Constable Zafar Iqbal No.7887/FRP**, Major punishment of reduction in pay to initial stage. His absence period i.e 07.08.2014 to 20.10.2014, total (74) days treated as with out pay. His pay is also released.

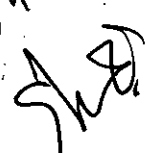
**ORDER ANNOUNCED.**

Dated 09.01.2015.

OB No. 36 /FRP

Dated 09 /01/2015.

  
**(SANA ULLAH KHAN MARWAT)**  
 Superintendent of Police,  
 FRP, D.I.Khan Range, D.I.Khan.

Attester  


**ORDER:-**

My this Order will dispose off departmental enquiry initiated against Constable Zafar Iqbal No.7887/ FRP of FRP D.I.Khan on the allegation that according to daily diary report No.1 dated 29.08.2017 of FRP Police Line DIKhan, he remained absent from law full duties with effect from 10.07.2017 to 29.08.2017 total (50) days without any leave or permission from the competent authority.

He was served with Show Cause Notice on 01.08.2017 and was required to submit the reply of said show notice within stipulated period but he failed to do so. He was served with charge sheet and statement of allegation. SI Sardar Hussain LO/FRP DIKhan Range was nominated as enquiry officer. After completion of all codal formalities the Enquiry Officer submitted his finding report. He was also heard in person but he failed to convince the undersigned about his innocence.

Keeping in view the facts stated above, I MR. AMAN ULLAH KHAN, Superintendent of Police FRP D.I.Khan Range, D.I.Khan, in exercise of powers vested in me under Khyber Pakhtunkhwa Rules-1975 with amendments-2014 hereby order to be treated his absence period i.e 10.07.2017 to 29.08.2017 total (50) days as without pay. His pay also released.

**ORDER ANNOUNCED.**

Dated 18.10.2017

OB No. 744 /FRP  
Dated 18 /10/2017

*Attested*  
*[Signature]*

*[Signature]*  
(AMAN ULLAH KHAN)  
Superintendent of Police,  
FRP, DIKhan Range DIKhan

15/11

ORDER:-

10

"F"

FRP D.I.KHAN RANGE

This Order will dispose off the case of absence of Constable Zafar Iqbal No.7887/FRP of FRP, D.I.Khan Range, that according to daily diary report No.27 dated 17.09.2017 of FRP Police Line DIKhan, he remained absent from law full duties with effect from 10.09.2017 to 17.09.2017 total (07) days without any leave or permission from the competent authority.


On the basis of above he was served with Show Cause Notice on 05.10.2017. He was required to submit the reply of said Show Cause Notice within stipulated period but he failed to do so. He was also heard in person but he failed to convince the undersigned about his innocence.

Keeping in view the facts stated above, I MR. AMAN ULLAH KHAN, Superintendent of Police FRP D.I.Khan Range, D.I.Khan, in exercise of powers vested in me under Khyber Pakhtunkhwa Rules-1975 with amendments-2014 hereby order to be treated his absence period i.e 10.09.2017 to 17.09.2017 total (07) days as without pay. His pay also released.


ORDER ANNOUNCED.

Dated 18.10.2017

OB No. 744 /FRP  
Dated 18 /10/2017

  
(AMAN ULLAH KHAN)  
Superintendent of Police,  
FRP, DIKhan Range DIKhan.

9/10/17

Attested  


" F/2 " (10/2)

**ORDER:-**

My this Order will dispose off departmental enquiry initiated against Constable Zafar Iqbal No.7887/ FRP of FRP D.I.Khan on the allegation that according to daily diary report No.19 dated 29.08.2017 of FRP Police Line DIKhan, he remained absent from law full duties with effect from 10.07.2017 to 29.08.2017 total (50) days without any leave or permission from the competent authority.

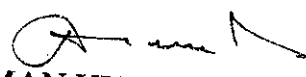
He was served with Show Cause Notice on 01.08.2017 and was required to submit the reply of said show notice within stipulated period but he failed to do so. He was served with charge sheet and statement of allegation. SI Sardar Hussain LO/FRP DIKhan Range was nominated as enquiry officer. After completion of all codal formalities the Enquiry Officer submitted his finding report. He was also heard in person but he failed to convince the undersigned about his innocence.

Keeping in view the facts stated above, I MR. AMAN ULLAH KHAN, Superintendent of Police FRP D.I.Khan Range, D.I.Khan, in exercise of powers vested in me under Khyber Pakhtunkhwa Rules-1975 with amendments-2014 hereby order to be treated his absence period i.e 10.07.2017 to 29.08.2017 total (50) days as without pay. His pay also released.

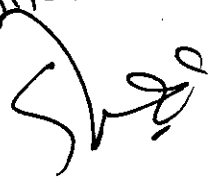
**ORDER ANNOUNCED.**

Dated 18.10.2017

B No. 799 /FRP  
dated 8 /10/2017

  
(AMAN ULLAH KHAN)  
Superintendent of Police,  
FRP, DIKhan Range DIKhan.

15/11

Attested  


F/3 20/3

14/11/15  
06-1-16  
Ex-

This order shall dispose of the departmental appeal lodged by Constable Zafar Iqbal No.7887 of FRP DI Khan Range DI Khan against the order of SP/FRP, DI Khan Range DI Khan.

Constable Zafar Iqbal No.7887 of FRP DI Khan Range DI Khan absented himself from lawful duties w.e.f.7.08.2014 without any leave or permission. On 20.10.2014 he reported back for duty.

On the basis of above he was served with Show Cause Notice. He was required to submit his reply with in stipulated period of 07 days of its receipt but he failed to do so. He was proceeded against departmentally and served with proper charge sheets and statement of allegations SI Rustam Khan was appointed as enquiry officer. After completion of all codal formalities the enquiry officer submitted his findings report alongwith other relevant papers wherein he stated the defaulter Constable was time and again summoned to record his statement and also for completion of departmental proceedings but he did not attend the enquiry proceeding. Hence the enquiry officer submitted his finding along with all the enquiry papers for taking appropriate action.

Keeping in view the facts stated above as well as finding report of enquiry officer Constable Zafar Iqbal No.7887 was awarded major punishment of reduction in pay to initial stage under KP Police Rules 1975 by taking ex-parte action against him. His absence period i.e.7.08.2014 to 20.10.2014 total (74) days treated as without pay.

He was heard in person. During the course of hearing he advanced cogent reasons in his defence. His plea was found plausible and satisfactory. Keeping in view the above, the order regarding award of punishment i.e. reduction in pay in initial stage under KP Police Rule 1975 and treating his absence period i.e 07.08.2014 to 20.10.2014 total (74 days) is here by set aside with retrospective effect. His absence period is converted into earned leave.

Resubmitted  
04-01-2016

03/04/15 SRC/18  
for n/a action.

Signature

Accepted  
Signature

Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar.

06-01-016  
No 1121/EC dated Peshawar the 29/12/2015.

Copy of above alongwith Service Record is forwarded to the SP FRP DI Khan Range DI Khan for information and necessary action.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 1499/2021**

**Zafar Iqbal Ex Constable FRP, No. 7373 Bannu, Range Presently Basti Sher Pao Abad,  
Near Madina Colony Dera Ismail Khan..... Appellant.**

**VERSUS**

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

**AFFIDAVIT**

We respondent's No.01 to 08 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 that in this appeal  
The answering Respondents have neither been  
Placed ex. Party nor their defence is struck off.*

*[Handwritten Signature]*

**Deponent**

Inspector Javed Khan  
CNIC No.12103-7159785-3

**ATTESTED**

*[Notary Seal and Signature]*  
AZMAT AIL ADVOCATE  
Notary Public  
Municipal Complex, Peshawar  
07-2023

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 1499/2021.**

**Zafar Iqbal, Ex-FC No. 7373, FRP Bannu Range, presently Basti Sher Pao Abad,  
Near Madina Colony Dera Ismail Khan .....Appellant.**


**VERSUS**


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

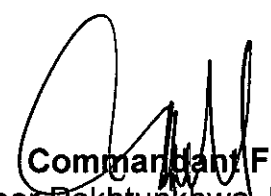
**AUTHORITY LETTER**

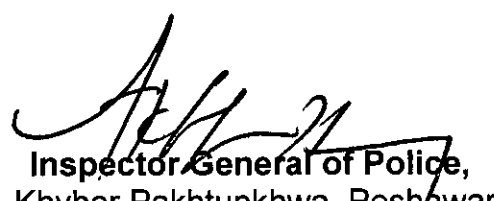
Respectfully Sheweth:-


We respondents No. 1 to 8 do hereby solemnly authorize Mr. Inspector Javid Khan of FRP DI Khan Range 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. 07 & 08)**

  
**Deputy Commandant FRP,  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 06)**

  
**Commandant FRP,  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 05)**

  
**Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 03 & 04)**

  
**Secretary Home & Tribal Affairs,  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 02)  
Home Secretary,  
Khyber Pakhtunkhwa**

  
**Chief Secretary Government,  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 01)**