



10th July, 2023

1. Counsel for the appellant present. Mr. Fazal Shah Mohmand,
Addl. Advocate General for the respondents present.

2. Counsel for the appellant seeks adjournment in order to
further prepare the brief. Granted. To come up for arguments on
15.09.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

Fazle Subhan P.S


26.04.2023

Appellant in person present.

Muhammad Jan; learned District Attorney for respondents present.

Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on 23.05.2023 before D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar


(Rozina Rehman)
Member (J)

Mutazem Shah

23rd May, 2023


1. Learned counsel for appellant present. Mr. Muhammad Jan, District Attorney for respondents present.

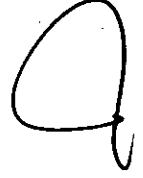
2. Being not prepared, learned counsel for appellant requested for adjournment in order to prepare the brief.

Adjourned. To come up for arguments on 10.07.2023 before D.B.

P.P given to the parties.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

Mutazem Shah

03.01.2023

Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested that as connected nature appeal has been fixed for arguments on 04.01.2023, therefore, the appeal in hand may also be fixed for the said date. Adjournd. To come up for arguments on 04.01.2023 before the D.B.

(Mian Muhammad)
Member (E)

(Salah-ud-Din)
Member (J)

4-1-23

Due to Rush of work therefore
case is adjourned to 10-2-23

Rehman

10.02.2023

Learned counsel for the appellant present. Mr. Muhammad Adcel Butt, Addl. Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Granted. To come up for arguments on 26.04.2023 before the D.B.

(FAREEHA PAUL)
Member (E)

(ROZINA REHMAN)
Member (J)

SCANNED
KPST
Peshawar

30.06.2022

Learned counsel for the appellant present. Mr. Sheraz Khan HC alongwith Mr. Naseer Ud Din Shah, Assistant Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 06.10.2022 before the D.B.



(Rozina Rehman)
Member (J)

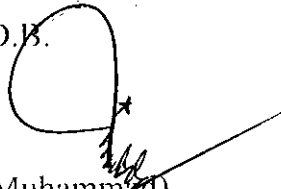


(Salah Ud Din)
Member (J)

06.10.2022

Junior to counsel for the appellant present. Mr. Kabir Ullah Khattak, Additional Advocate General respondents for present.

Junior to counsel for the appellant requested for adjournment on the ground that his counsel is not available today. Adjourned. To come up for arguments on 07.11.2022 before D.B.



(Mian Muhammad)
Member (E)



(Kalim Arshad Khan)
Chairman

07.11.2022

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Adjourned. To come up for arguments on 03.01.2023 before the D.B.

SCANNED
M. ST
Peshawar



(Fareeha Paul)
Member (E)

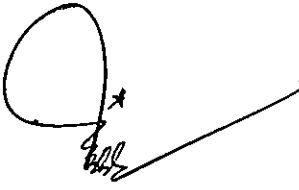


(Rozina Rehman)
Member(J)

06.10.2021

Counsel for the appellant and Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.

Counsel for the appellant seeks adjournment for preparation and proper assistance. Request is accorded. To come up for arguments before the D.B on 03.01.2022.



(Mian Muhammad)
Member-E


Chairman

03.01.2022

Counsel for the appellant and Mr. Asif Masood Ali Shah, DDA for the respondents present.

Former requests for adjournment in order to further prepare the brief. Request accorded. To come up for arguments on 10.03.2022 before the D.B.


(Atiq-ur-Rehman Wazir)
Member(E)


Chairman

10-3-2022

Due to retirement of the Honorable Chairman the case is adjourned to come up for the same as before on 30-6-2022


Reader

[Faint, illegible text, possibly a stamp or official note]

[Faint, illegible text, possibly a stamp or official note]

[Faint, illegible text]

[Faint, illegible text]

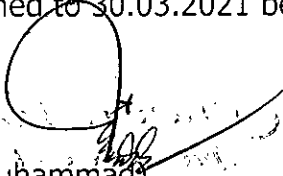
11.01.2021


Junior counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

A request for adjournment was made as issue involved in the present case is pending before Larger Bench of this Tribunal.

Adjourned to 30.03.2021 before D.B.

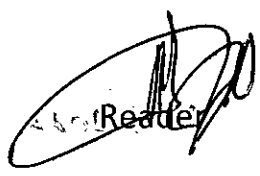

(Mian Muhammad)
Member (E)


(Rozina Rehman)
Member (J)

30.03.2021


Due to non availability of the concerned D.B, the case is adjourned to 28.06.2021 for the same.

28.06.2021


Syed Noman Ali Bukhari, Advocate, for the appellant present. Mr. Mukhtar, LHC alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested that the issue of retrospectivity is involved in the instant appeal, regarding which a Larger Bench has already been constituted. Adjourned. To come up for further proceedings before the D.B on 06.10.2021.


(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)


(SALAH-UD-DIN)
MEMBER (JUDICIAL)

2.4.2020 Due to public Holiday as a result of (COVID-19) the case is adjourned. To come up for same on 29-6-2020.



29.06.2020

Due to COVID-19, the case is adjourned to 24.08.2020 for the same.



Reader

24.08.2020

Due to summer vacation case to come up for the same on 03.11.2020 before D.B.

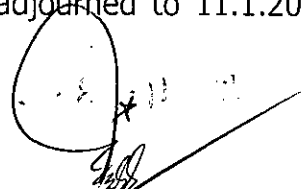


Reader

03.11.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 11.1.2021 for hearing before the D.B.



(Mian Muhammad)
Member




Chairman

03.09.2019

Learned counsel for the appellant present. Mr. Usman Ghani learned District Attorney alongwith Mr. Akbar Hussain SI for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 14.11.2019 before D.B.


(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

14.11.2019

Appellant with counsel present. Mr. Ziaullah, DDA for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 14.01.2020 before D.B.


Member


Member

14.01.2020


Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, learned counsel for the appellant is not available today. Mr. Kabirullah Khattak, Additional AG for the respondents present. Adjourned to 24.02.2020 for arguments before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

24-2-2020

The Bench is incomplete
Therefore case is adjourned
to 2-4-2020


Reader

04.04.2019

Appellant in person and Mr. Kabirullah Khattak learned Addl; AG for the respondents present.

Due to general strike on the call of Bar Council learned counsel for the appellant is not in attendance.

Adjourned to 23.05.2019 before D.B.


Member

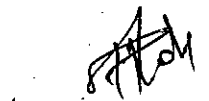

Chairman

23.05.2019

Appellant in person and Mr. Kabirullah Khattak learned Addl. AG for the respondents present.

A request for adjournment is made due to indisposition of his learned counsel.

Adjourned to 10.07.2019 before D.B.


Member


Chairman

10.07.2019

Learned counsel for the appellant and Mr. Riaz Khan Paindakheil learned Assistant Advocate General present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 03.09.2019 before D.B.


Member


Member

24.12.2018

Syed Numan Ali Bukhari, Advocate for appellant and Addl. AG alongwith Niaz Muhammad Inspector for the respondents present.

Representative of the respondents states that the requisite reply is in the process which shall be positively submitted on the next date of hearing.

Adjourned to 30.01.2019 before S.B.


Chairman

30.01.2019

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Sheraz Khan, Head Constable for the respondents present and requested for adjournment for filing of written reply. Adjourned to 19.02.2019 for written reply/comments before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

19.02.2019

Learned counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Sheryar H.C present. Written reply on behalf of respondent department submitted. Adjourn. To come up for rejoinder/arguments on 04.04.2019 before D.B.


Member

11.09.2018

Miss. Uzma Syed, Advocate and Syed Noman Ali Bukhari, Advocate counsels for the appellant present and heard in limine.

Contends that the major punishment of dismissal from service has been imposed on the appellant without affording opportunity of hearing and again with retrospective effect.

Points raised need consideration. The appeal is admitted to full hearing, subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 06.11.2018 before S.B.

Appellant Deposited
Security & Process Fee

Appellant Deposited
Security & Process Fee
7/11/18


Chairman

06.11.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 24.12.2018. Written reply not received.


READER

24.12.2018

Syed Numan Ali Bukhari, Advocate for appellant and Addl. AG alongwith Niaz Muhammad Inspector for the respondents present.

The reply by respondents is already placed on file. To come up for arguments before the D.B on 25.02.2019. The appellant may submit rejoinder within a fortnight, if so advised.

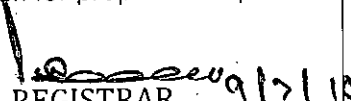


SCANNED
KPST
Peshawar

Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 870/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/07/2018	<p>The appeal of Mr. Ishtiaq Ahmad presented today by Syed Nouman Ali Bukhari Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 9/7/18</p>
2-	27.07.2018	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>27/7/18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>Neither appellant nor his counsel present. Case to come for preliminary hearing on 11.09.2018 before S.B.</p> <p style="text-align: right;"> Chairman</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 870/2018

Ishtiaq Ahmad

V/S

Police Deptt:

INDEX


S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	----	1-3
2.	Copy impugned order	-A-	04
3.	Copy of departmental appeal	-B-	05-07
4.	Vakalat Nama	-----	08

APPELLANT

THROUGH:


(SYED NOMAN ALI BUKHARI)

&


(UZMA SYED)
ADVOCATES, HIGH COURT
PESHAWAR

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 870 /2018

Ishtiaq Ahmad, EX- Constable, No.833/306
Elite Force, Kp Peshawar.

Khyber Pakhtukhwa
Service Tribunal

Diary No. 1132

Dated 09-07-2018

.....(Appellant)

VERSUS

1. The Commandant Elite Force KP, Peshawar.
2. The Deputy Commandant Elite Force KP, Peshawar.

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER of RESPONDENT NO. 2 DATED 30.01.2011 WHEREBY, THE APPELLANT HAS BEEN DISMISSED FROM SERVICE AND AGAINST NOT TAKEN ACTION ON THE DEPARMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDERs DATED 30.01.2011 NOT COMMUNICATED TO THE APPELLANT MAY PLEASE BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED IN TO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARADED IN FAVOUR OF APPELLANT.

Filed to-day

Registrar

9/7/18

RESPECTFULLY SHEWETH:

FACTS:

Facts giving rise to the present service appeal are as under:

1. That the appellant was the employe of the Police force and was on the strength of Elite Force Peshawar.
2. That the appellant had been some serious domestic problems (mother illness) due to which appellant didn't performed his duties so the absentia of the appellant was not willingfull but due to above mentioned reasons.
3. That, thereafter, the appellant was departmentally proceeded, without charge sheet, statement of allegation, regular inquiry and even without showcause notice, the impugned order dated 30.01.2011 was passed against the appellant whereby the appellant was dismissed from service with retrospective effect which was also never communicated to the appellant. The appellant recived the same on 14.2.2018 through its own efforts. The appellant been agrrieved from the impugned dismissal order preffered departmental appeal, the same was not responded within statutory period of 90 days. **(Copy of impugned order and departmental appeal is attached as Annexure-A & B.**
4. That now the appellant come to this august Tribunal on the following grounds amongst others.

GROUND:

- A) That the impugned orders dated 30.01.2011 not communicated to the appellant and not taken action on the departmental appeal of the appellant with in statutory period of 90 days is against the law, facts, norms of justice and void-ab-initio as has been passed with retrospective effect and material on record, therefore not tenable and liable to be set aside.
- B) That the impugned order was retrospective order which was void in the eye of law and according to Superiors Court Judgment reported as 2002 SCMR, 1129 and 2006 PLC 221. And no limitation run against the void order.
- C) That there is no order in black and white form to dispense with the regular inquiry which is violation of law and rules and without charge sheet, statement of allegation and proper inquiry the appellant was dismissed from the service vide order dated

30.01.2011 which is never communicated to the appellant, without given personal hearing which is necessary and mandatory in law and rules before imposing major penalty. So the whole procedure conducted has nullity in the eye of law. So the impugned order is liable to be set aside.

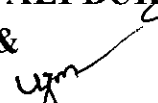
- D) That the appellant has been condemned unheard and has not been treated according to law and rules.
- E) That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on this score alone.
- F) That the absent of the appellant was not intentionally but due to some domestic problem and serious illness of his mother. So the penalty imposed upon the appellant was so harshed.
- G) That no chance of personal hearing was provided to the appellant and as such the appellant has been condemned unheard throughout.
- H) That the appellant is young and efficient but due to some serious problems he can't attend the duties, the department taken so harsh view, may kindly be taken lenient view and reinstate the appellant in to service.
- I) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT
Ishtiaq Ahmad

THROUGH:


(SYED NOMAN ALI BUKHARI)

&

(UZMA SYED)
ADVOCATES, HIGH COURT
PESHAWAR

A

(4)

ORDER

You Constable Ishiaq Ahmad No. 883/306 of elite Force remained absent from duty 13.08.2008 till this date.

Proper departmental enquiry was conducted against you and given full opportunity but you did not appear before the enquiry officer, but you neither joined the enquiry proceeding conducted against you nor appeared for duty. It seems that you have no interest in your official duty the enquiry officer recommended you for major punishment.

I, Muhammad Iqbal Deputy Commandant Elite Force KPK. Peshawar as the competent authority impose major penalty of dismissed from service upon you from the date of absence.

(MUHAMMAD IQBAL)
Deputy Commandant

Elite Force Khyber Pukhtunkhwa Peshawar

No. 4505-05 /EF, dated Peshawar the 30/01/2011.

Copy to the:-

1. Deputy Commandant, Elite Force, Khyber Pukhtunkhwa, Peshawar.
2. DSP/HQrs., Elite Force, Khyber Pukhtunkhwa, Peshawar.
3. Accountant, Elite Force, Khyber Pukhtunkhwa, Peshawar.
4. EC/SRC and OASI, Elite Force, Khyber Pukhtunkhwa, Peshawar.

اشياق احمد
Received on Date. 14/2/2018

Attested

3

To

The Commandant Elite Force
Khyber Pakhtunkhwa, Peshawar.

Through proper Channel

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE ORDER
DATED 30.01.2011, WHEREBY THE APPELLANT WAS
DISMISSED FROM SERVICE.**

Respected Sir,

Most humbly it is submitted that:

1. That the appellant was the employee of the police and was on the strength Elite Force, Peshawar.
2. That the appellant had been some serious Domestic Problem (mother illness) due to which appellant didn't performed his duties so the absentia of the appellant was not willing full but due to above mentioned reasons.
3. That, thereafter, the appellant was departmentally proceeded, without charge sheet, statement of allegation, regular inquiry and even without showcause notice, the impugned order dated 30.01.2011 has been passed against the appellant whereby the appellant was dismissed from service from retrospective effect.

ATTESTED

4. That appellant being aggrieved of the impugned order of respondent and now file this departmental appeal inter-alia on the following grounds amongst others.

GROUND:

- A) That the appellant has not been treated in accordance with law, rules and policy on subject and acted in violation of Article 4 of the Constitution of Islamic Republic of Pakistan 1973 by the respondents and the appellant has been dismissed from his legal service without adopting legal Pre-requisite mandatory Legal procedure. The order passed in violating of mandatory provision of law, such order is void and illegal order according to superior court judgment. Hence the impugned order is liable to be set aside.
- B) That the impugned order was retrospective order which was void in the eye of law and also void according to Superiors Court Judgment reported as 1985 SCMR 1178, 2006 PLC 221. Further it is added that no limitation was run against the void orders.
- C) That neither charge sheet, statement of allegation, show cause notice was not served upon the appellant nor was inquiry conducted against the appellant, which was necessary and mandatory in law before imposing major punishment which is violation of law, rules and norms of justice.
- D) That the appellant has not been treated according to law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on this score alone.

ATTESTED

- E) That no chance of personal hearing was provided to the appellant and as such the appellant has been condemned unheard throughout.
- F) The undersigned is young and efficient but due to some serious problems he can't attend the duties, kindly take a lenient view and re-instate the appellant in to service.

It is therefore, most humbly requested that impugned order dated 30.01.2011 may be set aside and reinstated the appellant with all back and consequential benefits.

Ishtiaq Ahmad

Appellant

Ex. constable Ishtiaq Ahmad
 Belt No. 883/306
 Cell No. 0305-9799192,

Date:16.03.2018

E.C
Rh
 16/3

to
ATTESTED

No. 2344
 to 16-3-18
 Permanent Elite Force

VAKALAT NAMA

NO. _____/20

IN THE COURT OF K.P.K Service Tribunal, Peshawar

Ishfaq Ahmad (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Police Deptt (Respondent)
(Defendant)

I/We, Ishfaq Ahmad

Do hereby appoint and constitute **Syed Noman Ali Bukhari and Uzma Syed, Advocates Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20

اشفاق احمد
(CLIENT)

ACCEPTED

Syed Noman Ali Bukhari
SYED NOMAN ALI BUKHARI
Advocate, Peshawar.

Uzma Syed
UZMA SYED
Advocate, Peshawar.

BEFORE THE HON'BLE KPK SERVICE TRIBUNAL PESHAWAR
APPEAL NO. 870/2018

Ishtiaq Ahmad, Ex-Constable, No. 833/306
Elite Force, KPK Peshawar

.....APPELLANT

VERSUS

Commandant Elite Force KP & others
Deputy Commandant Elite Force

.....RESPONDENTS

PARAWISE COMMENTS ON BEHALF OF RESPONDENTS 1 & 2

Respectfully Sheweth,

Preliminary objections:

1. That appeal is badly time barred.
2. That appeal is bad for mis-joinder and non-joinder of necessary parties.
3. That appellant has not come to this Tribunal with clean hands.
4. That appellant is estopped by his own conduct to the instant appeal.
5. That appeal is not based on false and fabricated facts.

ON FACTS:

1. Pertains to record. Hence, need no comments.
2. Correct to the extent that appellant was absent from his lawful duty without prior permission from concerned authority. Moreover, no application for leave had been submitted. He was wilfully absent from his lawful duty and has rightly been dismissed from service after satisfying all the codal and legal procedure.
3. Appellant was departmentally proceeded after fulfilling all the pre-requisites, codal procedure and has rightly been dismissed from service. Over writing on the receiving date of the dismissal order reflects clear manipulation and fabrication on the part of appellant. Moreover, no departmental appeal is available on record. Furthermore, law helps vigilant and not indolent. **(Copy of dismissal order is attached as Annexure-A)**

4. That the respondents have approached this Hon'ble Tribunal to dismiss this appeal of the appellant on the following grounds:

GROUND:

- A. Incorrect. Order passed by the competent authority is legal and has been communicated to appellant within a stipulated period of time. Moreover, over-writing made on the date mentioned on the impugned order annexed with appeal reflects clear manipulation and fabrication. Whereas no departmental appeal preferred by appellant is available on record. Hence, impugned order is liable to be maintained.
- B. Incorrect. Impugned order has been passed by competent authority in accordance to law.
- C. Incorrect. Impugned order is passed, in accordance to law, after fulfilling all the codal procedure and had been communicated to appellant well within a time.
- D. Incorrect. Appellant had been departmentally proceeded in accordance to law.
- E. Already explained in para-D.
- F. Incorrect. Appellant wilfully remained absent from lawful duty without prior permission. Hence, action taken against appellant is appropriate and justified.
- G. Incorrect. Appellant had been departmentally proceeded in accordance to law.
- H. Already explained in para-F.
- I. Respondents may also be allowed to advance any additional ground at the time of hearing the instant appeal.

PRAYER:

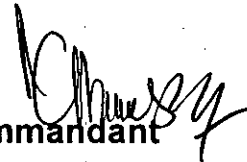
It is, therefore, most humbly prayed that in the light above-narrated facts, appeal may kindly be dismissed for being devoid of merit.



Commandant

Elite Force Kpk, Peshawar.

(Respondent No. 1)



Deputy Commandant

Elite Force Kpk, Peshawar.

(Respondent No. 2)

BEFORE THE HON'BLE KPK SERVICE TRIBUNAL PESHAWAR
APPEAL NO. 870/2018

Ishtiaq Ahmad, Ex-Constable, No. 833/306
Elite Force, KPK Peshawar.

.....**APPELLANT**

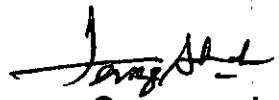
VERSUS

1. Commandant Elite Force KPK, Peshawar.
2. Deputy Commandant Elite Force KPK, Peshawar.

.....**RESPONDENTS**

AFFIDAVIT

We respondents 1 & 2 do hereby solemnly affirm and declare that the contents of this written reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Commandant
Elite Force Kpk, Peshawar.
(Respondent No. 1)



Deputy Commandant
Elite Force KPK, Peshawar.
(Respondent No. 2)

ORDER

You Constable Ishiaq Ahmad No. 883/306 of elite Force remained absent from duty 13.08.2008 till this date.

Proper departmental enquiry was conducted against you and given full opportunity but you did not appear before the enquiry officer, but you neither joined the enquiry proceeding conducted against you nor appeared for duty. It seems that you have no interest in you official duty the enquiry officer recommended you for major punishment.

I, Muhammad Iqbal Deputy Commandant Elite Force KPK Peshawar as the competent authority impose major penalty of dismissed from service upon you from the date of absence.


(MUHAMMAD IQBAL)

Deputy Commandant

Elite Force Khyber Pukhtunkhwa Peshawar

No. 4508-03/EF, dated Peshawar the 30/01/2011.

Copy to the:-

1. Deputy Commandant, Elite Force, Khyber Pukhtunkhwa, Peshawar.
2. DSP/HQrs., Elite Force, Khyber Pukhtunkhwa, Peshawar.
3. Accountant, Elite Force, Khyber Pukhtunkhwa, Peshawar.
4. EC/SRC and OASI, Elite Force, Khyber Pukhtunkhwa, Peshawar.

OB : 115

Date: 24/2/2011