# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No. 1794 of 2022.

Hamidullah S/o Khairullah Khan R/o Shao Tehsil Dir, District Dir Upper.

(Appellant)

#### Versus

- 5. The District Police Officer, Upper Dir.
- 6. The Regional Police Officer, Malakand at Saidu Sharif Swat.
- 7. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
- 8. Government of Khyber Pakhtunkhwa through Secretary Home & Tribal Affairs at Peshawar.

(Respondents)

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Inspector Legal, Dir Upper.



### BEFORE TH E KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

#### Service Appeal No 1794/2022

Hamid Ullah s/o Khair Ullah Khan r/o Shao Tehsil District Dir Upper......Appellant

#### <u>VERSUS.</u>

- 1) Provincial Police Officer, Khyber Pakhtunkhawa Peshawar.
- 2) Regional Police Officer Malakand at Saidu Sharif, Swat.
- 3) District Police Officer Dir Upper

### PARA WISE COMMENTS ON BEHALF OF RESPONDENTS.

Respectfully Sheweth:

#### PRELIMINARY OBJECTIONS.

- 1) That the service appeal is not maintainable in its present form.
- 2) That the Appellant has got no cause of action and locus standi to file the instant Appeal.
- 3) That the appellant has not come to this honourable Service Tribunal with clean hands.
- 4) That the present Service appeal is badly barred by law and limitation.
- 5) That this honorable Service Tribunal has got no jurisdiction to entertain the present service appeal.
- 6) That the appellant has suppressed the material facts from this honorable service tribunal.
- 7) That the Appeal is bad for mis- Joinder and non- Joinder of necessary parties.

#### **ON FACTS:**

1. Correct, to the extent of enlistment as general duty constable in the police department the rest of the para is incorrect as evident from record. The appellant being habitual violator of the laws/ rules of the mother land and previously dismissed from service. The appellant was directly charged vide FIR No. 168 dated 08.12.2021 u/s 9(D) CNSA PS Excise department Peshawar. (Previous bad entries, and copies of FIR are attached as annexure "A")

- 2. The appellant was proceeded against departmentally owing to his involvement in the above mention criminal case. Proper departmental enquiry was initiated and later on he was served with final show cause notice and lastly dismissed from service. (charge sheet, statement of allegation, final show cause and dismissal order are attached as annexure "B & C")
- 3. Incorrect, proper opportunity was provided to the appellant and the appellant was called in orderly room and heard in person but he could not produce reasonable ground in his defense. The departmental appeal filed by the appellant found groundless, hence, rightly rejected by the competent authority.
- 4. Incorrect, the orders of the respondent No. 01& 02 are legal, lawful and in accordance with law/ rules and the appellant wrongly invoked the jurisdiction of the Honorable Service Tribunal with un-sound grounds.

#### GROUNDS

- i. Incorrect, both the orders are based on facts, hence, liable to be intact.
- ii. Incorrect, prior to issuance of both the orders, proper opportunities of personal hearing were given to the appellant.
- iii. Incorrect, the appellant was the employee of the respondent department but throughout his career neither official nor any general public was satisfied from his duty and committed misconduct several times. The whole service record of the appellant is tainted with bad entries as explained in the preceding paras (copies of bad entries are annexed as "D").
- iv. The appellant being member of disciplined force badly violated the rules of the department and created a very bed atmosphere and directly charged in FIR. Also, the apex court of Pakistan in a judgment passed in CP No. 3122 of 2020 held;
  - "17. the police force is a disciplined force with cumbersome accountability and responsibility of maintaining law and public order in the society and populace, therefore, any person who wants to be part of the disciplined force should be a person of utmost integrity and uprightness with unimpeachable/spotless character and clean antecedents. Despite acquittal, it is the privilege and prerogative of the employer which is in this case "Punjab Police Force". So, it is for the department to examine fairly and equitably whether the petitioner has been completely exonerated or not and his further induction may not become a constant threat to the discipline of the police force and public confidence and may also not demoralize and undermine the environment and frame of mind of the upright and righteous members of the force, therefore a person having criminal antecedents would not be fit to be restored or reinstated to his previous position or post."

V.

Incorrect, punishment, awarded to the appellant, is in accordance with law.

- vi. The appeal is barred by law as the Limitation Act 1908 is very much clear & the same objection has already been raised in the preliminary objections as well the the legal maxim "Ignorantia Juris Non Excusat" which means ignorance of the law is no excuse cannot be ignored.
- vii. That the appellant approached this Honorable Tribunal, inter-alia, with un-sound grounds.

  The respondents also seek leave of this honorable Tribunal to rely on additional grounds at the time of arguments/ hearing.

#### PRAYER:

It is therefore humbly prayed that on acceptance of this Para-wise reply, the appeal may graciously be dismissed with cost.

District Police Officer, Upper Dir. Regional Police Officer, Malakand at Saidu Sharif, Swat.

Regional Police Officer, Malakand Region, Saidu Sharif, Swat.

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

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(Respondents)

#### **Affidavit**

I, Gul Zamin Khan, Inspector Legal do hereby solemnly affirm and declared that the contents of parawise reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

2 8 SEP 2023

DEPONENT Gul Zamin Khan, Upper Dir.

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

## TRIBUNAL PESHAWAR.

Service Appeal No. 1794 of 2022.

Hamidullah S/o Khairullah Khan R/o Shao Tehsil Dir, District Dir Upper.

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(Respondents)

#### **Power of Attorney**

We, the undersigned do hereby authorized Gul Zamin Khan, Inspector Legal to appear on our behalf before the honorable Service Tribunal in the cited above case on each and every date.

He is also authorized to file Para-wise comments/ reply, prefer appeal and to submit the relevant documents before the Tribunal.

District Police Officer, Upper Dir. Regional Police Officer, Malakand at Saidu Sharif, Swat.

> Regional Police Offices Malakand Region, Saidu Sharif, Swat.

ابتدا قي اطلاعي ريوزت ابتدائيا الماع نسبت جرم فاعل دست انعازى وليس راج دي المدوز يرد فعد ما المجور ف البلو مدارى 168 SHO (104, 2 /2 CHOCIONIC POR CONTRA ام والمن المر مراتب المان فالقال وير عامي والمن المر ويو المرون يونيش ما مان كار مان المرون كالمرون كا الدائي اطلاع نج درج كرو- الس ودّ آنك يحري مراهم تانے رواکی کاری وا ع فررندم أمرار الرائس مرفعلی فان فانون مارس و دهر اوی اکسا را و والما الا بر تسامها را دار المارى عباك عقا) ما الم وتوسر لديّ صور مع موجود مع الم ساس کی اور الحال کا کوسٹر فری 15-5314 و اللہ کی طرف سے آڑا ہے۔ المرن حيال المد كرس المرور المراك لا توال ملى المراح المركود من الله على عادِن تحديد والساور والم عليار عن الدر المرا الدراك بلاشك شاير مراك سرح من ال عدد ارد كائل من من من ميوند برامو بوكم مرابعه د من مي در سرد ساد ساد الما در ساد می در ساد می در سال می در سال می سالم معاروس عرا مرا المعالم المعالم المعارس المعارس عرا معارس المعارات و حلم لفاء درس وزف بالا المراس مرا من عام بگ و ساری ساید می ایس می می ایس المن دروان الدر ركا حاكر المع عدد مراسم تما ما ركول برقب تلائي منا معالن مر تسبرات فريوس من كو من عسامة ولاجسرواهه خان حا توسي المنال المر دروال تمام شريص البردر كو مرتك قرا بالا كارا عاكر حسب منابع كفا عارد موان دای ای ساسه مرد مندوی ، مارد کوناسی ، در نواش عایم برای ما سن کارد سمب سرم رسر عمرای ای علی حان خان رساوی منامن ساوی PTO Esla Const ( Proposition Colly) /5/

مرینسده چهر بیاد بار به بازد و 228 تا در میرود 20.06.201 بازد و بازد و 20.06.201 از در باید) منی قارم (در باید) ماند جرقابل دست اندازی و کسر ایور می در اور می مانده می ایور می در اور می ایور می ایو 7:01:15 Co 15.00.100 Co 7 ( 20.78) the constant 420 distribution in the state of th المراج ال منحرات الراموات وقد تقرب المرات المرا 14/6/2016/2 THE DESIGNATION OF THE PARTY OF

4. 18100 cus 23 6 Oris cos 610 4 15140 Cis 23 6 19/1 ONE 15140 Cus 23 6 Os with 304. JU 37/38 Charle willy cle of ى جهان ها در الن نا صلى الى وقار دار الوارى رى المسال والمرا العارى المسالم وارا العارى المان العارى المسالم والمرا الوارى المان العارى المسالم والمرا الوارى المسالم والمرا المان ا العرف فالی ای فران و کاس طرف کار اور در این روزان جاری کورت معدی بے صابی 6 گروزن، می معادر می معادر و قار می آمیری میرانوران می E/ 13 ( 6 0 1/2 1/2 1/2 / 1/2 / 1/2 / 1/30 / 1/30/20 1 Cin De 15 Con de Cotto de Con Es وُندُون مِي مَا مِنْ وَفِي وَلَى وَلَى وَلَى وَلَى وَلَى وَلَى وَلَى وَلَى وَلَى الْمُونِ فِي وَلِي الْمُونِ وَلَى الْمُونِ وَلَى الْمُونِ وَلَى الْمُونِ وَلَى الْمُونِ وَلَى الْمُونِ وَلَى الْمُؤْمِنِ وَلَى الْمُؤْمِنِ وَلَى الْمُؤْمِنِ وَلَى الْمُؤْمِنِينَ وَلَى الْمُؤْمِنِ وَلَى الْمُؤْمِنِ وَلَى الْمُؤْمِنِ وَلَى الْمُؤْمِنِ وَلَى الْمُؤْمِنِ وَلَا مِنْ وَلِي الْمُؤْمِنِ وَلَى وَلَا مِنْ وَلِي الْمُؤْمِنِ وَلَى وَلَا مِنْ وَلَا مِنْ وَلِي الْمُؤْمِنِ وَلَا مِنْ وَلِي وَلِي مِنْ مِنْ فَالْمِنْ فِي وَلِي مِنْ فَالْمُؤْمِنِ وَلَا مِنْ فَالْمُؤْمِنِ وَلَا مِنْ فَالْمِنْ فَالْمِنْ فِي فَالْمُونِ فِي الْمُؤْمِنِ فِي فَلْمُ وَلَا مِنْ فَالْمُؤْمِنِ وَلَا مِنْ فَالْمُؤْمِنِ وَلَا مِنْ فَالْمِنْ فِي فَالْ را میں اللہ سے الراسے جرویزں ما میں ہرائے دومیں ہوں وہ میں دیں محرى من وقت در اس در الم المراك و وراهد المراك و المراك و مان و قاص ولا ي ي ملك ع دا ور دلد بخرا الرين ق عروا في دالز إلى ما كان بي قريد في ما المراد المراكز الرين في عرف المراكز الم 

1) o- 117 / 15 / 6 / 8 F CONTROLL OF THE STATE OF THE ST ين بلك اعدازي لويس زيور أل شده ولا وفعة ١٥ المجموعة طالبط ومبداري 1/20:30 WW//WA8 506 ب رسیدس رابع رط بیرم دلی س الى جۇقتىش مىتعلق كى كى اگراطلاع درج كرنے ميں توقف بوابوتو دجه بيان كرد Je July Steps 3 216 VI ilei رفين تے خالی کھا۔ میں فعطات درج رفید ہو گئی میں بعدہ اللہ والاقط Wile District Color Colo Joue Giles by Joseph Collins of the عالم الماري من الماري الماري والماري والماري الماري مع المرات م المول سنة مل السب المالية يفور المحد لدن سر حراس ما قال المراق الم المروك المعلى ما من من المرابط ال الم المناحد وان المعط كر أوركان الرجود ين بهور سامان لفيهال رسيره القرى كالمدار بر سے درکان نے فرنگ سالزہ دَوَهُ لَ إِنْ لَعْدَى فِي مِعْ وَجُوْمُ خُرْسِر 15 Who was 2011 /3 will 1800 1111 1800 1111 1800 1111 1800 عَ اللَّهُ مِنْ اللَّهُ اللَّ المالم وكرفعل ولاق سالن فل المادة ما المادة من المادة 46 NCP 1923 Cops cup les le

#### CHARGE SHEET.

I Atiq Ullah Khan Wazir, District Police Officer, Dir Upper, as competent authority, as per DD report, you constable Hamid Ullah No. 237 while posted in PS Sheringal is involved in case vide FIR No. 168 dated 08.12 2021 u/s 9DKPCNSA PS Excise, Peshawar Division. So this amounts a gross misconduct on your part.

- 2. By reason of the above, you appear to be guilty of criminal act and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Disciplinary Rules 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.
- Your written reply, if any should reach to the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case the ex-parte action shall follow against you. Intimate as to whether you desire to be heard in person or not?
- 6. Statement of allegation is enclosed.

(Atiq Ullah Khan Wazir)
District Police Officer,
Dir Upper.

No. 19 17 - 18 /SB, Dated Dir Upper the 25 / 2021.

Copy to Constable Hamid Ullah No. 237 while posted in Sheringal, submit your reply to the Charge Sheet with stipulated period.

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#### DISCIPLINARY ACTION.

I Atiq Ullah Khan Wazir, District Police Officer, Dir Upper, as competent authority, is of the opinion that Constable Hamid Ullah No. 237, have rendered him liable to be proceeded against departmentally as he has committed the following acts/omission as defined in Rule-2 (iii) of Police Rule 1975

#### STATEMENT OF ALLEGATION.

Whereas, you constable Hamid Ullah No. 237 while posted in PS Sheringal is involved in case vide FIR No. 168 dated 08.12.2021 u/s 9DKPCNSA PS Excise, Peshawar Division. So this amounts a gross misconduct on his part.

- 2. For the purpose of scrutinizing of the said accused with reference e to the above allegations, Mr. Ghulam Sadiq, SDPO Kolaistan is appointed as the Enquiry Officer under the said Rules.
- \*3. The Enquiry Officer shall conduct proceeding in accordance with provision of Police Rule 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record its findings and make within fifteen days (15) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official.
- 4. The accused official shall join the proceeding on the date, time and place fixed by the Enquiry Officer.

Ullah Khan Wazir)

Joint Folice Officer,

Dir Upper,

No. 1912 - 18 /SB, Dated Dir Upper the

28/2/2021.

Copy of the above is forwarded to:-

- 1. The Enquiry Officer for initiating proceeding against the accused official under Police Rule, 1975.
- 2. Concerned defaulter official.

Allested

#### OFFICE OF THE DISTRICT POLICE OFFICER, UPPER DIR

FINAL SHOW CAUSE NOTICE.

No. 02

Upper Dir the 16 /03 /2022. EB, Dated

- 1. Whereas, you Constable Hameed Ullah No. 237 while posted in PS Sheringal, committed gross misconduct as defined in section of Khyber Pakhtunkhwa Removal from Service (Special power) Police Rules, 1975 (defined under rule-4(b)), resultantly your was Charge Sheet/Statement of Allegation were issued and DSP Ghulam Sadiq was appointed as Enquiry Officer to conduct proper departmental enquiry.
- 2. Whereas, The Enquiry Officer finalized the Enquiry proceeding given you full opportunities of defence. The Enquiry Officer held you guilty of the charge leveled against you as per charge sheet.
- 3. And whereas, Ongoing through the finding and recommendation of Enquiry Officer. The material placed on record and other connected papers including your defense before the said Enquiry Officer. I am satisfied you have committed the misconduct and are guilty of the charge leveled against you as per statement allegation conveyed to you vide this Office Memo: No. 1917-18/SB dated 28.12.2021 which stand proved and render you liable to be awarded punishment under the said rule.
- 4. Now therefore, I Nazir Khan, District Police Officer Dir Upper, as competent authority have tentatively decided to impose upon you, any one or More penalties, including the penalty of Dismissal from service under the said rule.

You are therefore, required to show cause within seven days of the receipt of this notice, as to why the aforesaid penalty should not be imposed upon you, failing it shall be presumed that you have no defense to offer and ex- party action shall be taken against you. Meanwhile also intimate whether you desired to be heard in person or otherwise.

Alles lest Minister

District Police Officer,

Upper Dir.

and the section of knyper Pakhtunkhwa Removal from Service power) Police Rules, 1975 (defined under rule-4(b)), resultantly your was Charge atement of Allegation were issued and DSP Ghulam Sadiq was appointed as Officer to conduct proper departmental enquiry. s, The Enquiry Officer finalized the Enquiry proceeding given you full nities of defence. The Enquiry Officer held you guilty of the charge leveled against er charge sheet. ereas, Ongoing through the finding and recommendation of Enquiry Officer. The placed on record and other connected papers including your defense before the airy Officer. I am satisfied you have committed the misconduct and are guilty of e leveled against you as per statement allegation conveyed to you vide this Office o. 1917-18/SB dated 28.12.2021 which stand proved and render you liable to be ounishment under the said rule. sfore, I Nazir Khan, District Police Officer Dir Upper, as competent authority tively decided to impose upon you, any one or More penalties, including the Dismissal from service under the said rule. ierefore, required to show cause within seven days of the receipt of this notice, the aforesaid penalty should not be imposed upon you, failing it shall be hat you have no defense to offer and ex- party action shall be taken against you. ; also intimate whether you desired to be heard in person or otherwise. District Police Officer, Upper Dir.



## OFFICE OF THE DISTRICT POLICE OFFICE UPPER DIR.

#### ORDER.

This order will dispose of the departmental Enquiry cagainst Constable Hemeed Ullah No.237 while posted in PS Sherin

Allegations leveled against the above named defaulter (Hemeed Ullah No.237 while posted in PS Sheringal, whereas 360 Chars were recovered from his possession, where a proper case FIR dated 08.12.2021 U/S 9DKPCNSA PS Excise Peshawar was regist was suspended and closed to Police Lines vide this office O.B No. 8 28.12.2022. So the above act amounts to gross misconduct on Therefore, the charge sheet coupled with statement of allegation him and Mr. Ghulam Sadiq SDPO Kohistan, Upper Dir was apper Enquiry Officer.

During the course of departmental enquiry, the enquirecorded statement of the defaulter official. The Enquiry Officer subhis finding report that he is guilty of the charges level against him allegations were proved beyond in shadow of doubt.

On the perusal of the finding report, the defaulter Const issued Final Show cause Notice vide this office No. 02/EB, dated 16. The reply of the same was perused and found unsatisfactory. Ther was called in orderly room and heard in person, but he could not any plausible evidence in his self-defense in this regard. Morec following grounds are also observed.

- 01. The defaulter has been arrested by the Police Pahaving 3600 Narcotics (Chars) in his bag.
- 02. The case of the defaulter constable is heinous.
  - 3. The act is grievous which is not only effects as indivalso effect badly the whole society and the Departm
- 04. The defaulter caused a bad name for Police Departm

Therefore, Keeping in view the recommendation of t Enquiry Officer and material on the record, I Nazir Khan, District Officer, Upper Dir (Competent Authority) in exercise of powers vest undersigned under Police Rules-1975 (amended in 2014) and Police Rules-1975, hereby dismissed the defaulter Constable Hameed Ullah No. 2 Police service with immediate effect.

Order announced.

OB No. 254

Dated: 15-04- 12022

District Police (

Dir Upper.

Merley 1

10 نواش (اس rugs do 24/6 2 Un 35 M 1 20 2 14:10 Eig 24/6 700 Lo Dugs 25 M Kindonie, Jun 12 | 23 | 6 3 1/10 17 m / 18 2 237 2 mille إسرار ملا م المران بالا تي مران بالا تي مران بالا تي مران بوالي FIR CAN 1, CAS PPL 506.440-427-148-19(10 23/6 20 384 4 cie در نے ہے کے اس مذکورہ کو تکان در اس جسب ما بھا گرفتار نسلم على مرتب مرح وزور قيل م كاد الحالم المال ع مرس I de to Friend Um, i Cu و إمار عالمد إلى 5 jr. Forwarded masi-PL-Dif (4) 24-6-017 LO DIN IU) Commoraed R 29-06.017 DEP LUQ. Kou, Swan Couse. depet mel proceeds Topolupa Milaslet 5407/19

4 6 popular 25 -30 36,91/4 File 24 3 136 191 23 poples our relates 237 & villa سے آن طافر آرکیا ہے جو سے چور کو یہ میں اور کی سے چراجی سے چراجی اس ره معا رو معانون را ما مون مرا ما من مرا ما من ما و مرار موزار الرام الم و فرار می معانی ورد روزنا قر سور مرد و تعادا کامان ی فيرج الفرض ففر فعامل فاروافي أفسران الا تع فرف مسراها 18U ip THI Stepe on / 50- 85 porwarded الطحانة SHOP3 tell كنبل وذكوره الله الماء لوم عرسانوس ده جع سے وال تنگواہ د بندل سفارش 25-3-01S ( cistan one day absonce p base without pay Sopo Kohiston · 2-011-018 OSP HON OB NOL 260 10-9-10-05-2018

- It /2 At 24 5/8 36/11 23 /sla 1 1 23 Con 18: 18: 25 con 24 018 719 MASI 23 po 1) ci la 22/5 / 6/10 / مارک دستا- سر ای کی کی دستا- سر کا فالورس ما مرا المعمالة برمى والعراك المرات برمى والعراك المروري را منے وہ ام فول مسرات سیارے کے ہیں۔ سربرست مارین ا ك خلاف الرائ عدم عافرى درج موز مافي كرك آمرير مفصل سانات ك مار بردو نعلدات عبرهافره/ ما حرى نعرض ساس کاوار افسران بالاا مين ارسال كيها يمي ا بالله امل ب 4 MPH & PS Thould 24-3-018 testell Mestell

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12/3 18 Ward bi 145 Mes Chil au (11/18/18/16/20 au lo ci lo 2911 e specie inclination de la secte di la 9 de liver melle of cipilities - expecição le sibes - entraise espe atoplieses application Comment of the public public 29/145 The girle 43 in 1: 20:40 Eie la che le le priture 7111 White Comme + 1 Orisele Obligation Color 2 1 ce 12 3 0 - Compliance of bet the the 106000. Six الأع الميرط فزع ط فزى الماتشون - 40 10 W -46666 Just MASIZA - Swat 13-03-18 13-03-16 District Swat Sir, His absence Pro may be Counted as Absence Period Counted as Leave Wout Pay 013 20 05 DSPTHO Su 28-3-16 24-03-61 CL DOO/Swat 28-3-16

طورانال سيه 10/16/2/1/1/56/30 بِرِثَى لَاسُ كَلْ سُواتَ ماري ما رقب 10 = 20: 10 جوار الموسكة الموالي الموسكة الموالية الموسكة الموالية الموسكة الموسك تنبره انسرائره کوالم مر 62 اور اعم مراه این مراده کا اور این مراده کا مراد (6) ma (2) 0 = 16 per 6 20:40 ties (0 40 per 62) الله 145 على رفيد الله عالم والله عالم والله عالم الله عالى المنظ ع باوجود :مترور ما جال حاصر شاكا - الميد المرس الميروره ي فيرف رمورث منرصلوع ارس مززع - 2 60 8 0 jai 8 01 jain 1 2 2 عر (اما نظاف ام) ح 160/swet. -02-2016 His absence period may be consted as L. No pay 17-02-16 12-02-016 Abserbe Perio I Counted a Leave Wlout Pay 29-2-16

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19. 48 36,024 الم المعن مه ۱۹۵ بورس مهت مدی ن نحسر می از فستم الم الم معنت مه ۱۹۵ بورس معنی نام مدی از فستم من و سعکور سرائری توج مسروف کی سمتوست در در مشال موت 10 - vege 20 min 1 ob 10 1 1808 ang 12 12 min Plutine Me we de la ob ste wing is it is a sente and colored. ي روي روي المال المالي به ما نا منظر من ف وسي ما نام و تمار تحد صافع مند عاد الما المعالمة ما الما المعالمة المع عا وعده كر مس سالة رفية فرقية مؤن بر را رفي كالم تعي mode of Come and sou be suit of come العالم دروزه محمل رعب المعارفة مركس دافع المنافع المحالي المحالي المحالي المحالية المعالم المعالم المعالم المحالية ورائي معيل . في مذكوره لائل عني مديده في را بع ذي عم المحيد الصحيد الم اربن مي مجعيد فانوني رورها. في محفظ في بع ربي في الدينان الموقفة ي في منه الله من المورث وفي دون درج مسرسية الحوام الله سي ريوري منه فان فعره ما ذكر س جارور ريند درا الم والرسال و ما ما تنب ما ين مع كفيد معلى أو معد ست سو اكر نقال المحدود و تو الرق 

Mende 28/18 136 in 19 Ne (18/20 Co) 28/3 Co SHO WAGE 19) 237 m/28 1411 1/6 650 m/16/2/329 Jejo Mind 1 ( 25 16 / 80) in N. 291 Wille 1270 1376 de la la constant de welle with willow the ciner of and end of the same of to las cling for asofo lies suite to من مساعی عکوموں می ماخری دری اوز اور ای موال می است ا me copo e Il Mail Sel colo con colo per la se 6 (Pridas ja) mmps thalk 28/2