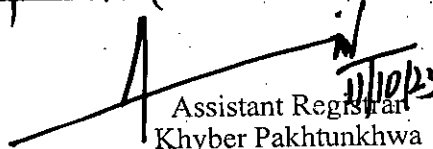


Cost of Rs. 5000/- received in Service Appeal No. 102/2023,

Titled Zubair Rehman vs. Police

in the office of Assistant Registrar, Vide Order

Submitted Dated: 11 / 10 / 2023


Assistant Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 102/2023.

Zubair Ur Rehman S/o Habib Ur Rehman (constable 4947 of FRP Kohat Range) R/o Shah Poor, KohatAppellant.

VERSUS

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

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2.	Previous Orders	A & B	03-04
3.	DD Report	C	05
4.	Charge Sheet	D	06
5.	Reply of Charge Sheet	E	07
6.	Enquiry Report	F	08
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Total			15

RESPONDENTS

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 102/2023.

Zubair Ur Rehman S/o Habib Ur Rehman (constable 4947 of FRP Kohat Range) R/o Shah Poor, KohatAppellant.

VERSUS

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

PARAWISE REPLY BY RESPONDENTS 1 to 3.

RESPECTFULLY SHEWETH.

PRELIMINARY OBJECTIONS:-

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. Petain to the appellant record needs no comment.
2. Incorrect. The appellant has been proceeded against various departmental enquiries for his indiscipline and illegal activities as evident from his service record and in this regard, there are 13 bad entries with no good entry in his credit. (Copies of previous punishment orders attached herewith as annexure "A & B").
3. Incorrect. The appellant has found indiscipline and disobedient Police Officer as he denied from the lawful order of his seniors with regard to special duty and remained absent without any valid leave or prior permission of the competent authority. Besides, he was also quarreled with Muharrar Line and aimed his loaded unlicensed pistol at him hence; his act is fallen within the ambit of gross misconduct and in this regard an indiscipline report was registered against him vide DD report No. 09, dated 08.10.2022. (Copy of DD report is attached as annexure "C"). On the allegations of above the appellant was placed under suspension and closed to line. He was proceeded against proper departmentally as he was issued Charge Sheet alongwith Summary of Allegations and Enquiry Officer was nominated to unearth actual facts.
4. Incorrect. Proper departmental enquiry was initiated against the appellant and the allegations leveled against him were fully established by the Enquiry Officer during the course of enquiry. After fulfillment of all codal formalities he was awarded major punishment of compulsory retirement from service as per law/rules.
5. Incorrect. Departmental appeal submitted by the appellant was thoroughly examined and rejected on sound grounds. The appellant has not come to this Honorable Tribunal with clean hands, hence the instant appeal being devoid of merits may kindly be dismissed on the following grounds.


GROUND:-

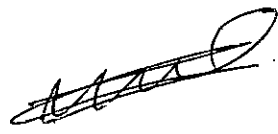
(2)

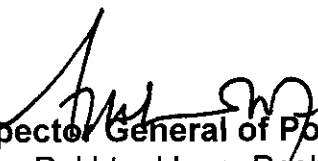
- A. Incorrect. The orders passed by the respondents in the case of appellant are legally justified and in accordance to law/rules as the same were issued after fulfillment of all codal formalities.
- B. Incorrect. The appellant was proceeded against proper departmentally as per law/rules.
- C. Incorrect. The allegations are false and baseless. Proper departmental enquiry has already been conducted against the appellant as he was issued Charge Sheet alongwith Summary of Allegations and Enquiry Officer was nominated. The appellant submitted his reply of Charge Sheet, which was found unsatisfactory by the Enquiry Officer. Upon the findings of Enquiry Officer he was issued/Served with Final Show Cause Notice, but his reply was found unsatisfactory. Hence, the entire proceedings against the appellant were carried out in accordance with existing laws and rules. (Copies of Charge Sheet, his reply & Enquiry Report, are attached herewith as annexure "D, E & F").
- D. Incorrect. As explained above. However, the allegations leveled against the appellant were fully established by the Enquiry Officer during the course of enquiry.
- E. Incorrect. Sufficient opportunities at every level of defense in the light of natural justice have also been provided to the appellant, but he failed to prove himself innocent.
- F. Incorrect. The appellant was fully associated with the enquiry proceedings and it is evident from Charge Sheet, Show Cause Notice and his replies. The appellant failed to approach for obtaining of enquiry report.
- G. Incorrect. In order to probe into the facts the statements of all witness were recorded by the Enquiry Officer, which the allegations were fully established against the appellant without any shadow of doubt. (Copies of the statements of witness attached herewith as annexure "G, H & I").
- H. Incorrect. A Final Show Cause Notice was issued and served upon him and his signature was obtained as a token of receipt. The appellant submitted his reply of Show Cause Notice before the competent authority, which was found unsatisfactory. (Copy of Show Cause Notice and his reply are attached as annexure "J & K")
- I. Incorrect and denied. The allegations leveled against the appellant were fully established by the Enquiry Officer during the course of enquiry.
- J. The respondent 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,
Kohat Range, Kohat
(Respondent No. 03)


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


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

Initials of attesting officer in attestation of columns 9 and 10	Leave taken:— nature and duration and rate of leave salary drawn, with the initials of the attesting officer	Reference to any recorded punishment or censure, reward or praise of the Government servant as well as to any interruption in service. If suspended whether period of suspension will count towards leave and pension with signature of the attesting officer	Remark
11	12	13	14
16 ¹ / ₀₇ To 19 ¹ / ₀₇	3 days	OB No. 372 D.P.O. Mohat. 8/5/07	M/Leave on full pay. S. P. R. F. Mohat
charges. Absented him from Vanwater Gardens	D.P.O. Mohat.	OB 934-1 8-11-07	1 day 10/07 to 23/07
13 ⁵ / ₀₈ To 28 ⁵ / ₀₈	15 days	OB No 110 13-5-08	Examination Leave on full pay. S. P. R. F. Mohat
2 ⁶ / ₀₈ To 12 ⁶ / ₀₈	10 days	OB No 146 2-6-08	M/Leave on full pay. S. P. R. F. Mohat
29 ⁶ / ₀₈ To 30 ⁶ / ₀₈	1 day	OB No 220 28-7-08	leave w/o pay. S. P. R. F. Mohat
28 ⁷ / ₀₈ To 11 ⁸ / ₀₈	15 days	OB No 219 28-7-08	Medical home rest on full pay. S. P. R. F. Mohat
12 ⁸ / ₀₈ To 15 ⁸ / ₀₈	3 days	OB No 264 3-9-08	Leave w/o pay Rs. 100/- S. P. R. F. Mohat
1 ¹¹ / ₀₈ To 15 ¹¹ / ₀₈	15 days	OB No 351 5-11-08	M/home Rest on full pay. S. P. R. F. Mohat
2 ¹⁰ / ₀₈ To 5 ¹⁰ / ₀₈	3 days	OB No 368 15-11-08	Leave w/o pay Rs. 100/- S. P. R. F. Mohat
28 ¹⁰ / ₀₈ To 29 ¹⁰ / ₀₈	1 day	OB No 418 24-12-08	Leave w/o pay. S. P. R. F. Mohat
10 ³ / ₀₈ To 16 ³ / ₀₈	7 days (5 days)	OB No. 306 3-5-11	Leave w/o pay. S. P. R. F. Mohat

Attested
S. P. R. F. Mohat
10/10/28

Reason of
nation (suc
otion, trans
missal, etc or
ant

10

Annual Certificate of Verification of Service with
signature and designation of head of office
(where required)

10th August 1918
S. P. F. R. P. Kohat

S. P. F. R. P. Kohat

ORDER

In pursuance of Indegment
of High Court of Madras order dt 6.11.07
& O.P. E & I K.P. NO. 1624/E & I dt
11-12-07, is hereby re-instated in
Service with immediate effect for the

purpose of ~~Pay~~ De-novo enquiry & his
Pay Fixd Re. 13760/- Bm 8-BK 2/18
OB NO. 33

dt 8-1-08

District Police Officer
Kohat

(Copy enclosed)

De-novo enquiry conducted by
S.P. M. Kohat, the accused was held guilty
of the charges is involved in league with
bad character women, using Alcohol & also
assaulting during absence while on duty
at S.P. Kohat city West.

Punishment: impose a major punishment of
reduction from higher stage to lower stage same time
pay for the period of 03 years, & he re-
instated in service, the inting period is fixed
as L/D pay & pay return & his pay fixd

OB NO
137
dt 8/1/18

Attested
10/1/18

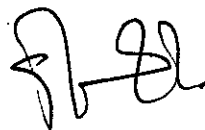
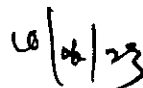
No. 490 /PA/FRPDated 11 / 10 / 2021

19


CHARGE SHEET

- I) I, Aman Ullah Khan, SP FRP Kohat as competent authority, am of the opinion that you Constable Zubair Rehman No. 4947/FRP have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.
- (a) That as reported by Muharrar FRP District Lines Kohat vide DD No. 07 dated 08.10.2022, you were detailed for special duty in D.I Khan for the occasion of 12th Rabi UI Awal but you absented yourself from said duty.
- (b). That as reported vide DD No. 09 dated 08.10.2022 Roznamcha District Lines Kohat, you after absence from special duty came to Roznamcha for arrival report and quarreled with Muharrar and aimed your loaded pistol on him. Your this act shows very undisciplined and unprofessional attitude. Thus you have committed a gross "Misconduct" as defined in Rule 2 (iii) of Police Rules 1975.
- II). By reason of the above, you seem to be guilty as sufficient materials is placed before the undersigned; therefore it is decided to proceed against you in general police proceeding.
- III). You are; therefore, required to submit your written reply within 07 days of the receipt of this charge sheet to the Enquiry Officer.
- IV). Your written reply, if any, should reach the Enquiry Officer within specific period, failing which it shall be presumed that you have no defense to offer and in case, ex-parte action shall follow against you.
- V). Intimate as to whether you desire to be heard in person or not?
- VI) A statement of allegation is enclosed.

Attested


SUPERINTENDENT OF POLICE, FRP
KOHAT RANGE, KOHAT



Superintendent of Police, FRP,
Kohat Range, Kohat

"D/2"

DISCIPLINARY ACTION

I, Aman Ullah Khan, SP FRP Kohat as competent authority, am of the opinion that you Constable Zubair Rehman No. 4947/FRP, have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.

STATEMENT OF ALLEGATION

- a) That as reported by Muharrar FRP District Lines, Kohat vide DD No. 07 dated 08.10.2022, you were detailed for special duty in D.I Khan for the occasion of 12th Rabi Ul Awal but you absented yourself from said duty.
- (b). That as reported vide DD No. 09 dated 08.10.2022 Roznamcha District Lines Kohat, you after absence from special duty came to Roznamcha for arrival report and quarreled with Muharrar and aimed your loaded pistol on him. Your this act shows very undisciplined and unprofessional attitude. Thus you have committed a gross "Misconduct" as defined in Rule 2 (iii) of Police Rules 1975.
- 2. For the purpose of scrutinize the conduct of said Constable with reference to the above allegations, SI Asif Hayat, E.O FRP Kohat is appointed as enquiry officer.
- 3. The inquiry officer shall conduct proceeding in accordance with provision of Police Rules 1975 and shall provide reasonable opportunity of defense and hearing to the accused official, record it is finding and make with twenty five (25) days of the receipt of this order, recommendation as to punishment or other appropriate action against the accused official.
- 4. The delinquent official shall join the proceeding on the date, time and place fixed by the officer.

Lubah
 0334.9524121
 37405.1037045
 13/10/2022

[Signature]
 SUPERINTENDENT OF POLICE, FRP
 KOHAT RANGE, KOHAT

Asif Hayat
[Signature]
 14/10/22

[Signature]
 Superintendent of Police, FRP,
 Kohat Range, Kohat

بمختصر جناب ایس پی صاحب ایف آر پی کوھاٹ ریجن کوھاٹ

عنوان: جواب چارج شیٹ

جناب عالی!

بحوالہ چارج شیٹ نمبری 490/PA/FRP مورخہ 11-10-2022 سائل حسب ذیل عرض کرتا ہے۔

- ۱۔ یہ کہ سائل نے رات ڈیوٹی کر کے اگلی صبح آرام کے لیے سو گیا تھا۔ مجھے ریجن الاڈل کی ڈیوٹی کے متعلق کوئی اطلاع موصول نہ ہوئی تھی۔
- ۲۔ یہ کہ بعد اندراج رپورٹ بحوالہ مد نمبر 7 مورخہ 08-10-2022 سائل برائے حاضری رپورٹ کرنے محرم کے پاس آیا۔ لیکن وہ میری حاضری رپورٹ درج کرنے سے انکاری تھا۔ سائل نے محرم سے نہ کوئی جھگڑا کیا ہے۔ اور نہ ہی سائل نے محرم پر پستول ایم کیا ہے۔ سائل کے خلاف درج رپورٹ روزنامہ بحوالہ مد نمبر 8 مورخہ 08-10-2022 نہ صرف یہ کہ حقیقت پر مبنی نہ ہے۔ بلکہ مبالغہ آرائی پر مشتمل ہے۔

لہذا استدعا ہے کہ میرے خلاف جاری شدہ چارج شیٹ بلا مزید کارروائی داخل دفتر کیے جانے کا حکم صادر فرمایا جائے۔

مورخہ 18-10-2022

Faher
0334-9524121 آپ کا تابعدار

کانشیل زیر رحمان نمبر 4947 پلاٹون نمبر 112

متعینہ ڈسٹرکٹ لائن کوھاٹ

Nic No = 37405-1037045-7
18-10-2022

Master

[Handwritten signature]

فائنڈنگ رپورٹ

محکمہ انکوائری بر خلاف کانٹریبل زیرالرحمان نمبر 4947 حال ایف آر پی لائن کوہاٹ

جناب عالی! بحوالہ مشمولہ چارج شیٹ نمبر 490/PA مورخہ 11.10.2022 بر خلاف کانٹریبل زیرالرحمان 4947 از دفتر جناب

SP/FRP صاحب کوہاٹ ریج جاری ہو کر من SI کو انکوائری آفیسر مقرر کیا من SI نے انکوائری کا نہایت باریک بینی سے مطالعہ کرنے کے بعد معروض

خدمت ہوں کہ:-

حقائق:- کانٹریبل زیرالرحمان نمبر 4947 جو مورخہ 08.10.2022 کو محرر FRP ڈسٹرکٹ لائن کوہاٹ نے بسلسلہ اسپیشل ڈیوٹی کیلئے طلب کر کے جو کہ حاضر نہ ہو کر جس کے خلاف رپورٹ غیر حاضری بحوالہ نمبر 07 مورخہ 08.10.2022 ہمراہ دیگر کانٹریبلان منجانب وحید اللہ شاہ محرر درج روز نامہ چھپوئی۔ مذکورہ کانٹریبل نے اسی روز بحوالہ نمبر 08 مورخہ 08.10.2022 حاضر کی۔ اسی غیر حاضری پر کانٹریبل زیرالرحمان نے محرر کے ساتھ چھٹیڑ چھاڑ کر کے کانٹریبل مذکورہ نے دیگر محرران کی موجودگی میں محرر پر پٹل نکالنا اور ایم کرنا گواہان کے بیان سے صاف واضح ہے۔ مذکورہ کانٹریبل کا یہ فعل انتہائی غیر ڈسپلن اور قانونی جرم ہے۔ پٹل بمعہ ایسوشن غیر لائسنس یافتہ قبضہ پولیس ہے

سروس ریکارڈ:- سابقہ ریکارڈ کے مطابق مذکورہ کانٹریبل کے 16 بیڈ انٹری اور 85 یوم غیر حاضری جس میں 21 بار بلا تنخواہ، 02 بار معطلی اور 01 بار سروس سے برخاست ہونا ثابت ہے۔ ریکارڈ ہمراہ لف انکوائری ہے۔

1- دوران انکوائری من SI اس نتیجے پر پہنچا ہوں کہ مذکورہ کانٹریبل کا محرر پر پٹل نکالنا اور ایم کرنا انکوائری سے ثابت ہوئی۔

2- مذکورہ کے خلاف قبل ازیں مقدمہ عدلت 254/2010 جرم 13AO تھانہ سٹی کوہاٹ درج ہوئی۔ جس پر بحوالہ OB No.119 مورخہ 06.04.2010 کو معطل ہوا۔

3- اسکے علاوہ بحوالہ نمبر 25 مورخہ 27.03.2013 SHO تھانہ سٹی کوہاٹ نے بھی مذکورہ کے خلاف غیر ڈسپلن حرکت اور بد کردار عورت سے تعلق رکھنے اور بد دوران ڈیوٹی نشے کی حالت میں ہوائی فائرنگ کرنے پر جناب DPO صاحب نے بحوالہ OB No 466 مورخہ 04.04.2014 کو سروس سے برخاست کیا۔

4- اور اسی طرح SI/PC اختر علی نے بھی مذکورہ کے خلاف رپورٹ ہائے غیر ڈسپلن اور بحوالہ نمبر 10 رپورٹ مورخہ 10.10.2018 بد دوران گاڑی چیکنگ مسافروں کیساتھ رویہ ٹھیک نہیں اور عورتوں کی عزت کا خیال نہیں رکھتا تھا۔ جس پر بحوالہ OB No.1269 مورخہ 12.11.2018 کو مذکورہ کی 02 سال سروس ضبط کی۔ جملہ کاغذات لف انکوائری قابل ملاحظہ ہے۔ جملہ انکوائری اور بیانات سے کانٹریبل مذکورہ قصور وار پایا جاتا ہے۔

5- مذکورہ کانٹریبل محکمہ پولیس پر ایک بدنامی داغ ہے جسکی حرکات و سکنات کی وجہ سے دیگر پولیس اہلکاران پر بڑا اثر پڑتا ہے۔

6- مذکورہ کانٹریبل کو (Major Punishment) دینے کی سفارش کی جاتی ہے۔ دیگر آفسران بالا کا حکم افضل ہے۔ رپورٹ انکوائری مرتب ہو کر گزارش ہے۔

(Signature)

انکوائری آفیسر

FRP کوہاٹ ریج، کوہاٹ

Attested

(Signature)

۱۰/۱۲/۲۳

بیان اذان طائر محمود
5126
2141

صہاب مالی 1

جو الٹے رنگ کی مہر عدویہ کانسٹیبل زبیر 4947 112 ممبر وہاں خدمت ہوں کہ میں
 اور صہاب الرحمن 5946 سعید رحمن 5054 اور وصیہ اللہ شاہ عمر دروہاچیہ 2141
 PPP ڈسٹرکٹ این میں موجود تھے کہ نومبر 22/10/08 بوقت 17:55 بجے تقریباً
 کانسٹیبل زبیر 4947 دروہاچیہ PPP میں داخل ہو کر مذکورہ نے اپنی غیر حاضری
 سے حاضری کے بارے میں عمر و وصیہ اللہ سے لیا۔ تو عمر صہاب نے حاضری کر
 کے کچھ بات کی مگر مذکورہ کانسٹیبل نے بحث دبا دھتہ کرتے ہوئے لٹیشن میں آ کر
 اپنی بڑھاپا کو اس سے پستول نکال کر عمر صہاب پر مار کرے ہوئے دھمکی
 ایئر الفار زمان سے نکالے جس پر ہم تینوں نے مذکورہ کانسٹیبل سے
 مزاحمت کر کے ان سے پستول اپنے قبضہ میں کر کے ان لوڈ کر دیا۔ اس کے
 بعد مذکورہ کانسٹیبل کو نینڈا آڑا لے کر معاملہ عاریطی طور پر ختم کر دیا۔
 کس یہ میرا بیان ہے جو حقیقت پر مبنی ہے۔

طائر محمود
5126
2141

Mobil 03155136603

الر
PL120

14/10/2022

Attested

[Signature]

10/10/22

بیان ارادہ سعید الرحمن 5054 مقرری بلاتون 109

صاحب عالی

جو اہل انکوائری پر خلاف کنستبل زبیر الرحمن 4947 مہر میں خدمت سے
112

کہ میں اور طراز محمد 5126 5046 صادق 115 اور سعید اللہ شاہ 5054 مقرری بلاتون 109 PRR

ڈسٹرکٹ ایجنٹ میں جو جو دفتر میں جو رقم 08/10/22 کو وقت 17:55 بجے تقریباً کانسٹیبل

زبیر الرحمن 4947 اور زبیر PRR میں داخل ہو کر مذکورہ اپنی غیر صاف کاری سے عامری

کے بار میں وصول اللہ شاہ کے پاس گیا تو فرمایا کہ عامری کرنے کے بعد صاف کاری کی گئی ہے

کنستبل نے جٹ مباحثہ کرتے ہوئے لٹیشن میں انکوائری ڈیپارٹمنٹ سے لیتول لنگال

ضرر صاحب پر ایجنٹ کرتے ہوئے دھکی اعینہ الفاظ زبان سے لنگال میں پر ہم تیلوں نے مذکورہ کنستبل

سے مزاحمت کرنا ان سے لیتول اپنے قبضہ میں کرنا ان کو دیکھا اس کے بعد مذکورہ کنستبل کو "مذکورہ" لکھی

لکھی دیکر صاحب سے ان کی طرف سے یہ عذر بیان کیا جو تصدیق پر مبنی ہے

سعید الرحمن 5054
109

Mob- 0342-1901208

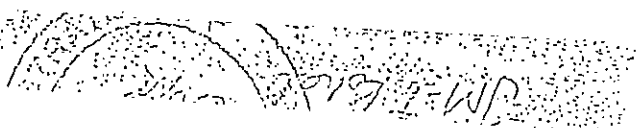
Attest

سعید الرحمن

109 PRR

14/10/22

10/10/22



(12) " J "

No. 466 /PA/FRP

Dated 22/09 /2022

OFFICE OF THE SUPERINTENDENT OF POLICE FRP KOHAT
SHOW CAUSE NOTICE

(Under Rule 5(3)(b) KP Police Rules 1975)

- I) Whereas you Constable Zubair Ahmad No. 4943/4947 of FRP Platoon No. 119 posted at P.S Doaba District Hangu, have rendered yourself liable to be proceeded under Rule 5(3)(b) of the Khyber Pakhtunkhwa Police Rules 1975 for the following misconduct.
 - a) That as reported by DPO Hangu vide his office letter No. 5196/EC dated 19.09.2022, you while posted at FRP Platoon No. 119 were directed repeatedly to report at joint check post of Police and Army at Zargari, but you did not bother to do so by willfully refusing the official orders of the DPO Hangu, which shows your indiscipline manner, negligence and gross misconduct on your part.
- II) That the misconduct on your part is prejudicial to good order of discipline in the Police Force.
- III) That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rule proposed stern action against you by awarding one or more of the punishments as provided in Rule 4.
- IV) You are, therefore, called upon to show cause as to why you should not be dealt with in accordance with the KP Police Rules 1975 for the misconduct referred to above.
- V) You should submit reply to this show cause notice within 07 days of the receipt of the notice failing which an ex-part action shall be taken against you.
- VI) You are further directed to inform the undersigned as to whether you wish to be heard in person or not.

Received By Zuber
Dated 7/10 /2022

Attested

[Signature]
10/10/22

Superintendent of Police, FRP
Kohat Region Kohat

خانی

حوالہ شوکار فوٹس نمبری 466/PA-FRP قاریہ ضلع - SP 545 - FRP

22-9-22

گواہت حضور حضرت یوں کہ سائل پلاٹوں نمبر 119 سٹینڈ رو آہ
 میں اپنی ڈھولے سرانجام دے رہا تھا۔ جو ٹیم مجھے چند گھنٹہ پورے میں درستی
 تھے۔ صلیب وجہ سے میں پلاٹوں کی اجازت سے روٹیں دیا
 کتابی سرے تھے۔ نیز رقم فون اطلاع موصول ہوئی کہ آپ اپنی طرف
 کی روٹ کر کے بعد لوہٹ نزدیکی اپنی ڈھولے سرانجام روٹ
 میں نے جسٹس اپنی ڈھولے احسن طریقے سے سرانجام دی ہے۔ اور میں
 نے بھی اپنی ڈھولے سے الگ نہیں کیا ہے۔ جو ٹیم میں کتابی سرے اور دو
 کتابی سرے اطلاع ملی ہے، جو ٹیم میں پٹیا سخت بیمار تھا۔ اور باہر عبوری
 میں پٹے کی دیکھ بھال علاج معالجہ کر رہا تھا۔ میں نے کسی قسم غفلت لادہ
 کا مظاہرہ نہیں کیا ہے۔ صرف 11/9/22 کو صرف روٹ ختم ہوئی ہے۔ بعد
 حوالہ 562/PA-FRP سے میرا تبادلہ پلاٹوں نمبر 119 سے پلاٹوں 112 ہو کر
 میں گواہت پلاٹوں نمبر 112 اپنی ڈھولے سرانجام دے رہا ہوں۔ اس قدر
 بیان ہے۔ جو کہ حقیقت پر مبنی ہے۔

07/10/22

سید

Sube

سید محمد شاکر شاہ پلاٹوں نمبر 112/PA-FRP قاریہ ضلع

Attested

10/10/22

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 102/2023.

**Zubair Ur Rehman S/o Habib Ur Rehman (constable 4947 of FRP Kohat Range)
R/o Shah Poor, KohatAppellant.**


VERSUS

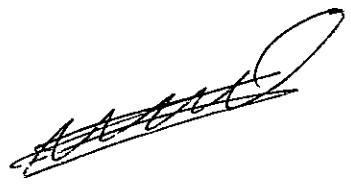
**Inspector General of Police, Khyber Pakhtunkhwa, Peshawar &
others.....Respondents.**

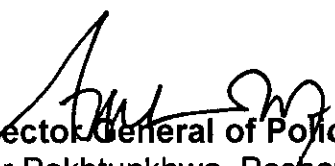
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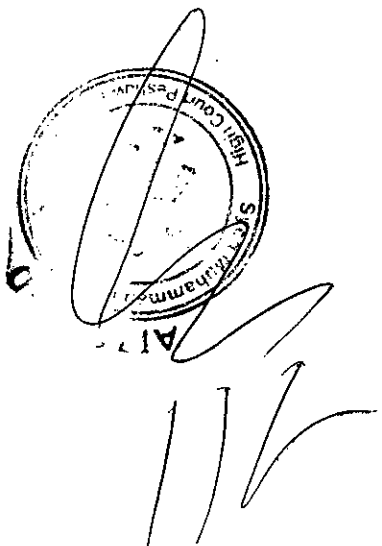
We respondents No. 1 to 3 do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments is correct to the best of our knowledge and belief that nothing has been concealed from this Honorable Court.

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


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


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


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



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 102/2023.

**Zubair Ur Rehman S/o Habib Ur Rehman (constable 4947 of FRP Kohat Range)
R/o Shah Poor, KohatAppellant.**


VERSUS

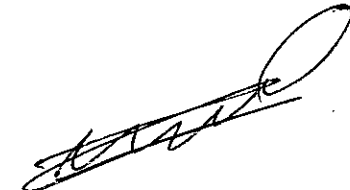
**Inspector General of Police, Khyber Pakhtunkhwa, Peshawar &
others.....Respondents.**

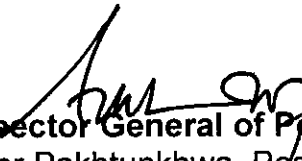
AUTHORITY LETTER

Respectfully Sheweth:-

We respondents No. 1 to 3 do hereby solemnly authorize Mr. Ghassan Ullah ASI FRP HQrs; to attend the Honorable Tribunal and submit affidavit/Para-wise comments required for the defense of above Service Appeal on our behalf.


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


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


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