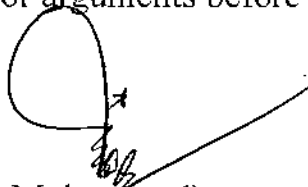


04.11.2022

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

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments before the D.B on 19.12.2022.

SCANNED
K.P.S.T
Peshawar



(Mian Muhammad)
Member (E)



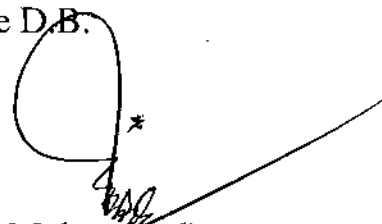
(Salah-ud-Din)
Member (J)

19.12.2022

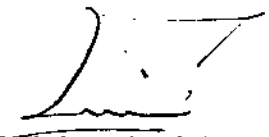
Learned counsel for the appellant present. Mr. Ihsanullah, ASI alongwith Mr. Muhammad Riaz Khan, Painsdakhel, Assistant Advocate General for the respondents present.

Learned counsel for the appellant seeks time for preparation of arguments. Adjourned. To come up for arguments on 15.03.2023 before the D.B.

SCANNED
K.P.S.T
Peshawar



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

02.09.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned Member (Judicial) Ms. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up arguments on 18.10.2022 before the D.B.



(Salah-Ud-Din)
Member (Judicial)

18.10.2022


Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Former made a request for adjournment as she has not made preparation of the brief. Adjourned. To come up for arguments on 04.11.2022 before D.B.



(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member (J)

24.02.2022

Due to retirement of the Hon'able Chairman, the case is adjourned to 11.05.2022 for the same before D.B.


Reader

11.05.2022

Counsel for the appellant present.

Muhammad Adeel Butt, learned Additional Advocate General alongwith Ihsan Ullah S.I for respondents present.

Representative of respondents submitted written reply/comments. Copy of the same is handed over to the learned counsel for appellant. To come up for rejoinder, if any, and arguments on 21.06.2022 before D.B.


(Rozina Rehman)
Member (J)

21.06.2022

Appellant alongwith counsel present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that she has not made preparation for arguments. Adjourned. To come up for arguments on 02.09.2022 before the D.B.


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

28.09.2021

Learned counsel for the appellant present.

Learned counsel for the appellant requested for adjournment to further prepare the brief. Adjourned. To come up for preliminary hearing before the S.B on 28.10.2021.


(MIAN MUHAMMAD)
MEMBER (E)

28.10.2021

Appellant in person present. Memorandum of appeal and the copies of record annexed there with have been perused.

The appellant has challenged the order of the competent authority whereby he was removed from service on account of willful absence. In absence of reply of the respondents, it is not clear from the face of impugned order as to whether the procedure provided for disciplinary action under Rule-9 of the Government Servants (Efficiency and Discipline) Rules 2011 about willful absence has been followed or not. This appeal is admitted for regular hearing subject to all just legal objections including the point of limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 23.02.2022 before the D.B.

Appellant Deposited
Security Process Fee

28/10/21


Chairman

17.11.2020

Counsel for the appellant present.

Learned counsel requested for adjournment of instant matter to a date after the hearing by Larger Bench in respect of cases, wherein, punishment with retrospective effect has been awarded.

As one of the grounds agitated in this appeal pertains to retrospectivity of punishment, the request of learned counsel appears to be reasonable.

Adjourned to 16.02.2021 for hearing before S.B.


Chairman

16.02.2021

The learned Member Judicial Mr. Muhammad Jamal Khan is under transfer, therefore, the case is adjourned. To come up for the same before S.B on 28.06.2021.


Reader

28.06.2021

Appellant present through counsel.

Former states that some appeals involving punishment with retrospective effect are pending adjudication before Larger Bench of this Tribunal. He, therefore, requests for adjournment of the instant matter to a date after the decision by the Larger Bench.

Adjourned to 28.09.2021 for hearing before S.B.


(Rozina Rehman)
Member(J)



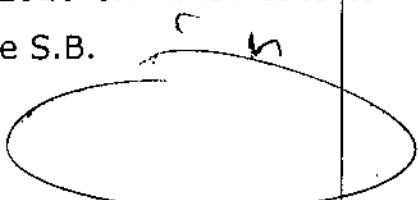
FORM OF ORDER SHEET

Court of _____

Case No.-

11008

/2020


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	24/09/2020	<p>The appeal of Mr. Salman resubmitted today by Naila Jan 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</p>
2-	03.11.2020	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>03/11/20</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Appellant is present in person.</p> <p>Since the Members of the High Court as well as of the District Bar Association, Peshawar, are observing strike today, therefore, learned counsel for appellant is not available today. Adjourned to 17.11.2020 on which date to come up for preliminary hearing before S.B.</p> <p style="text-align: right;"> (Muhammad Jamal Khan) Member (Judicial)</p>

The appeal of Mr. Salman Ex-F.C No. 2126 FRP Headquarters Peshawar received today i.e. on 09.09.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1 Copy of departmental appeal and revision petition mentioned in the memo of appeal are not attached with the appeal which may be placed on it.
- 2 Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- 3 All annexures of the appeal are illegible which may be replaced by legible/better one.
- 4 Annexures of the appeal are not in sequence which may be annexed serial was mentioned in the memo of appeal.
- 5 Memorandum of appeal may be got signed by the appellant.
- 6 Affidavit may be got attested by the Oath Commissioner.
- 7 Annexures of the appeal may be flagged.
- 8 Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2653 /S.T,

Dt. 10/09 /2020


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Naila Jan Adv. Peshawar.

*Reviewed all the
objections and*

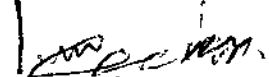
resubmitted my

18/9/2020

*Objections no. 1, 2 and 3 are still stand
the appeal in hand is returned again to the
counsel for the appellant for completion
and resubmission within 15 days.*

No. 2736 /S.T

Dt. 18/09 /2020


Registrar

Reply

of All objections are as:

- 1) I have already mention in Para 4 of facts of the appeal that D/A is not available with me may be requisition from department.
- 2) As per objection no. 2 is concern I have mention in para no 3 of appeal that the same has not been issued or served so there is no copy from the department. may kindly be requisition better copy also submitted.
- 3)

my signature
24/9/2020

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A 11008 /2020

Salman

VERSUS

The Inspector General of Police Khyber Pakhtunkhwa
Peshawar and others

INDEX

S#	Description of Documents	Annex	Pages
1.	Grounds of Appeal		1-5
2.	Condonation of Delay Application		6-7
3.	Affidavit		8
4.	Addresses of Parties.		9
5.	Copy of Medical prescription	"A"	10-19
6.	Copy of the Order dated 05/07/2019	"B"	20
7.	Copy of Order dated 05/09/2019	"C"	21
8.	Copy of Order dated 10/08/2020	"D"	22
9.	Wakalatnama		23

Dated: 09/09/2020

Appellant

Through

Naila Jan

Advocate High Court
Peshawar.

Naila Jan
AWC

D

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

In Re S.A _____/2020

Diary No. 9971

Dated 09/9/2020

Salman ex-FC NO: 2126, FRP Headquarters Peshawar.

-----*(Appellant)*

VERSUS

1. The Inspector General of Police Khyber Pakhtunkhwa Peshawar.
2. Commandant Frontier Reserved Police Khyber Pakhtunkhwa, Peshawar.
3. The Deputy Commandant Frontier Reserved Police, Khyber Pakhtunkhwa, Peshawar.

-----*(Respondents)*

**APPEAL U/S 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 AGAINST THE IMPUGNED
DATED 05/07/2019 WHEREBY THE
APPELLANT WAS AWARDED MAJOR
PUNISHMENT OF REMOVAL FROM
SERVICE WITH RETROSPECTIVE
EFFECT, ORDER DATED 05/09/2019
WHEREBY DEPARTMENTAL APPEAL OF
THE APPELLANT WAS REJECTED AND
ORDER DATED 10/08/2020 WHEREBY
REVISION UNDER POLICE RULES 11 (A)
WAS REJECTED FOR NO GOOD
GROUNDS.**

Filed today

Registrar

9/9/2020

NR

2

PRAYER:

**ON ACCEPTANCE OF THE INSTANT
APPEAL, THE IMPUGNED ORDERS
DATED 05/07/2019, 05/09/2019 AND
10/08/2020, MAY KINDLY BE SET ASIDE
AND THE APPELLANT MAY KINDLY BE
REINSTATED INTO SERVICE WITH ALL
BACK BENEFITS.**

Respectfully Sheweth

Appellant submits as under:-

1. That the appellant was enlisted in the year 2011 and since his appointment, the appellant performed his duty with great zeal, zeast and to the entire satisfaction of the department.
2. That while performing his duty, the appellant was informed that the son of the appellant is seriously ill and on the verbal permission of his Superior, the appellant went home to take his son to the hospital and was busy in looking after his son who was also subjected to major surgery and there was no one to look after him except the appellant. (Medical prescription is annexure "A")
3. That after recovery of his son, the appellant went to join his duty where the appellant was

handed over the impugned order dated 05/07/2019 whereby the appellant was removed from his service with retrospective effect without serving a charge sheet or conducting regular inquiry. (Copy of the Order dated 05/07/2019 is annexure "B")

4. That feeling aggrieved from the impugned order dated 05/07/2019 the appellant filed a departmental appeal, however, the same was rejected on dated 05/09/2019 without providing meaningful opportunity of personal hearing. However, copy of the departmental appeal is not available to the appellant, my kindly be requisition from the department. (Copy of the Order dated 05/09/2019 is annexure "C")
5. That thereafter, appellant filed Revision Petition under 11-A Police Rules 1975. However, the same was also rejected without providing meaningful opportunity of personal hearing vide order dated 10/08/2020. (Copy of the Order dated 10/08/2020 is annexure "C")
6. That feeling aggrieved from the above impugned orders, the appellant filing this service appeal on the following grounds inter-alia:-

4

GROUND:

- A. That the impugned orders are against the law facts and principle of natural justice hence liable to be set aside.
- B. That absence of the appellant was not willful but due to the illness of his son, therefore, the same is not willful and as per dictum laid down by Superior Courts, that if the absence is not willful, it does not amount to misconduct and no major penalty may be awarded in such like cases.
- C. That the appellant^{te} authority was provided all medical prescriptions and for the end of justice, He was required to inquire the same from the concern^{ed} doctor or hospital through an inquiry, however the appellant authority without paying any attention rejected the appeal and revision in a cursory manner through a non speaking order.
- D. That the punishment is harsh, and does not commensurate with the act of the appellant.
- E. That the appellant has been condemned unheard.

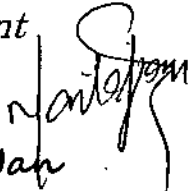
RR

3

F. That any other ground not raised here may graciously be allowed to raise at the time of arguments.

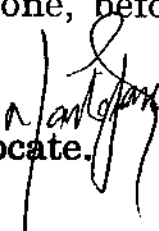
It is, therefore, requested that the appeal may kindly be accepted as prayed for.

Dated: 9/09/2020

Appellant
Through 
Naila Jan
Advocate High Court
Peshawar.

NOTE:-

No such like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.


Advocate.

8

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2020

Salman

VERSUS

The Inspector General of Police Khyber Pakhtunkhwa
Peshawar and others

AFFIDAVIT

I, Salman ex-FC NO: 2126, FRP Headquarters Peshawar, do hereby solemnly affirm and declare that all the contents of the accompanied appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

DEPONENT

Identified By :

Naila Jan

Advocate High Court
Peshawar.

9

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL PESHAWAR**

In Re S.A _____/2020

Salman

VERSUS

The Inspector General of Police Khyber Pakhtunkhwa
Peshawar and others

ADDRESSES OF PARTIES

APPELLANT.

Salman ex-FC NO: 2126, FRP Headquarters Peshawar

RESPONDENTS:

1. The Inspector General of Police Khyber Pakhtunkhwa Peshawar.
2. Commandant Frontier Reserved Police Khyber Pakhtunkhwa, Peshawar.
3. The Deputy Commandant Frontier Reserved Police, Khyber Pakhtunkhwa, Peshawar

Dated: 9 /09/2020

Appellant

Through

Naila Jan

Advocate High Court
Peshawar.



Government NKB Memorial, Hospital, Kohat, Road Peshawar
EMERGENCY DEPARTMENT (OPD) SLIP

Ph. No. 091-9211467-8



483

Amulay / A
14/4
2020

Complaints:

Rx

Sypp Nonidat
c + 1 (125mg)

Examination:

Temp 98.8°

B.P.

G.I.
Sypp
Citralup
4-2-2

Investigations:

Adv
Urine

Sypp
Sporlon
c + 1 + 1

Diagnosis:

Acute

G.I.

Signature



ACCIDENT & EMERGENCY DEPARTMENT
LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KP

Amount Paid : 20
 Invoice # : K02200879691
 Invoice Date : 25-APR-20 16:05:30

Print

NOI 20289487

Name : ABU BAKKAR

Age : 1 Year(s)

District : Peshawar

As

Ref Name : SALMAN KHAN

Complaints: **Emergency Department : EMERGENCY**
 UR RAHMAI

Counter : EMERGENCY

Cy 2 mictu

Findings:

SyD Novidate 607
⊙ ⊙ - 1/1 1 - 1

Investigations:

SyD Bifupen
Citra - voda - kurod
⊙ ⊙ 5 - 3/1 - 1/1 ⊙

Ande
→ Urea - A/E

INVOICE ISSUED
 By Ward Clerk

Diagnosis:

UTI

Next Visit:

Consultant Name:



ACCIDENT & EMERGENCY DEPARTMENT
LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KP

12

Amount Paid : 20
 Invoice # : K02191861577
 Invoice Date : 26-JUN-19 14:24:27

MRNo : K0200003431685 Name : ABUBAKAR KHAN
 Gender : Male Age : 6 Month(District : Peshawar
 Father / Husband Name : SALMAN KHAN

Visit Type : REGULAR Department : EMERGENCY

Operator : ATTA UR RAHMAI

Counter : EMERGENCY

Rx

griev. Abd --- (3) day.

Findings:

Investigations:

Abd:
 U/S Abd: +
 pelvis

Diagnosis:

[Handwritten scribble]

[Handwritten signature]

Next Visit: _____ Consultant Name: _____ Signature: _____

Phone: 9211430

website: www.lrh.gov.pk



ACCIDENT & EMERGENCY DEPARTMENT

LADY READING HOSPITAL

MEDICAL TEACHING INSTITUTION

PESHAWAR, KP

ADDITIONAL REGISTRAR

REGISTRATION NO. 159712104

ISSUED DATE: 15 APR 2011

13

MR. A. H. HANZALI

MR. A. H. HANZALI

MR. A. H. HANZALI

MR. A. H. HANZALI

MR. A. H. HANZALI

Complaints:

Rx

Findings:

Post laparotomy
fistula between
wound from
abdominal site due
to infection.

Investigations:

Syp phenoxon
1 + 1

Diagnosis:

Next Visit:

Consultant Name:

Signature:

Phone: 9211430

website: www.lrh.gov.pk

Associate Professor

Dr. Muhammad Ayub Khan

FCPS (Paeds Surgery)

Department of Paediatric Surgery
P.G.M.I Lady Reading Hospital,
Peshawar.

Clinic: Saeed Anwar Medical Center
Dabgari Garden Peshawar
Ph: No. 091-2214005

Asu Balkan

S.Malkh

(۱۶)

ایسوسی ایٹ پروفیسر

ڈاکٹر محمد ایوب خان

ایسوسی ایٹ پروفیسر (پیدیاٹرک سرجری)

ڈیپارٹمنٹ آف پیدیاٹرک سرجری

پی جی ایم آئی ایڈیٹیو ریڈنگ ہسپتال پشاور

کلینک سید انوار میڈیکل سنٹر ڈابگاری گارڈن پشاور

0300-5869397

091-2214005

0300-5869397

22/4/19

Post op. Intussusception

: ileostomy

oral tension sutures

①

Zinc Oxide Paste

(Powder)

Skin excoriation

② Mycitracin Cream

(L) 7.0

③ Behnovit N

Ointment

(L) 7.0

چھٹی بروز ہفتہ، اتوار

This is a Computer Generated result & does not need Signature

NOT VALID FOR COURT

سید انور کلینیکل لیبارٹری
SAID ANWAR CLINICAL LABORATORY

ڈاکٹر ہدایت صاحب
MPhil-Ph.D
Clinical Biochemist

سید انور میڈیکل سنٹر ڈبگری گارڈن پشاور کینٹ

Ph: 2215381, 2572702, 2214005 Fax: 2215379

NAME : ABO BAKAR

SEX : MALE

AGE : ?

SPECIMEN : BLOOD

TEST REQUIRED : HB, BLOOD GROUP, Hepatitis - B Surface, Hepatitis C Virus

DATE : 23/07/2019

TIME : 05:32:17

REPORT # : 4444

REFERRED BY : DR, MOHAMMAD AYUB KHAN SB

RESULT

TEST	RESULT	UNITS	NORMAL RANGE
HB	13.0	G/dl	M 14 - 18 , F 12 - 16
BLOOD GROUP			
BLOOD GROUP	O (- ive)		
RH. FACTOR	Negative.		
Hepatitis - B Surface			
Antigen (HBS)	Negative (- ive)		
Hepatitis C Virus			
Anti Bodies (HCV)	Negative (- ive)		

This is a Computer Generated result & does not need Signature
NOT VALID FOR COURT

SAIF BLOOD SERVICES




Shah Medical Center Sedan Shah Building
Dabgari Garden Chowk Peshawar. Cell: 0343-9080231

Health Care Commission
Reg No: 0956

Patient Name	ABUBAKAR	Date	23.07-2019
Sex	MALE	Time	02.20Pm
Age	07Months	Bag No	80
Referred By	Self	Specimen	Blood
Test	Cross Matching		

Patient Blood Group	" O "
RH Factor	Negative
Doner Blood Group	" O "
RH Factor	Negative
Cross Match	Compatibel
Screening of	
HBS Ag, HCV Ab, HIV Ab, VDRL ICT	Negative
One Point Of Blood 0 - Issue	


 Blood Bank Manager

The report can not be use for medico legal purposes. blood can not be return



ACCIDENT & EMERGENCY DEPARTMENT
LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KP

12

Amount Paid : 20
Invoice # : K02192097498
Invoice Date : 17-JUL-19 10:08:35

17/7/2019

MRNo : K02ACE19588480 Name : ABU BAKER
Gender : Male Age : 8 Month(District : Peshawar
Father / Husband Name : SOLEAMIN KHAN

Operator : NAQEEB ULLAH
Site Emergent Department : EMERGENCY
Operator : NAQEEB ULLAH

Counter : EMERGENCY

Findings:

Distal loop green

Investigations:

Diagnosis:

Next Visit:

Consultant Name:

Signature:

Phone: 9211430

website: www.lrh.gov.pk



POPULAR

12

Name	Abubakar	Date	17 July 2019
------	----------	------	--------------

DISTAL LOOPOGRAM

Distal loopogram reveals normal passage from the colostomy upto the rectum. No evidence of leak.

Normal evacuation.

Impression: Normal study.

12

DR. IHSAN UL KHALIQ
MBBS, DMRD-I, M-PHIL (Radiology),
Ex-Senior Radiologist Ultrasound & CT
Specialist Consultant PGMI, LRII & HMC.

POPULAR DIAGNOSTIC CENTRE, SUEKARNO CHOWK, PESHAWAR
Tel: 091-2552890, Fax: 091-2593235



OUTPATIENT DEPARTMENT (OPD)

LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KP

Appointment Time: 11:06

AMBU Care ID: 1246039
Phone: 9211430

Name: ABUBAKAR KHAN
Age: 60(Years)
Sex: MALES SURGERY

Father / Husband Name: M. A. HAN
Date: / /
Room No: 5

Complaints:

RX

Findings:

Post
Laparotomy
2 Stitches

Investigations:

Remove
Stitches
(48)

Diagnosis:

Next Visit:

Consultant Name:

Dr. Younis

Signature:



ACCIDENT & EMERGENCY DEPARTMENT
LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KP

Amount Paid : 20
 Invoice #: K02200945543
 Invoice Date : 25-MAY-20 20:24:30

18

K02ACF20321759

Name : ABU BAKAR

Male

Age : 2 Year(s)

District : POONCH

Husband Name : SALMAN KHAN

Acute Emergent Department : EMERGENCY

Complaints:

ANVEER HAZIR

Counter : EMERGENCY

(PUSS in urine)

- past h/o of multiple surgeries

Referred to Paed Surg

- Case of recurrent UTI

- Not responding to medical treatment

Findings:

Cephalic

Upright and pulling

his penis during Micturition

Keen to urology or opinion / medicine

Investigations:

- No. of bacterial growth requis at the time

Ante (and) R/E

Needs urine for (and)

Circumcision??

Diagnosis:

Diagnosis

Signature

Next Visit:

Consultant Name:

Signature:

Phone: 9211430

website: www.lrh.gov.pk

O.R.D.E.R.

29

Amir Khan

This order will dispose of the Departmental Enquiry against Constable Salman No.2126 of FRP/HQrs: Peshawar.

Brief facts of the case are that Constable Salman No.2126 of FRP HQrs: Peshawar absented himself from duty with effect from 27.01.2019 till to date without any leave/permission of the competent authority. In this regard formal departmental proceedings were initiated against him as he was issued Charge sheet /statement of allegations and DSP/FRP HQrs: Peshawar was appointed as Enquiry Officer. After completion of enquiry, the Inquiry Officer submitted his findings wherein he stated that Charge Sheet/statement of allegation were properly served upon the delinquent constable but he failed to submit his reply within stipulated period and at the end the Enquiry Officer has recommended the said constable for Ex-parte action. Upon the finding of Enquiry Officer, he was issued Final Show Cause Notice but the delinquent official badly failed to reply in response to the Final Show Cause Notice. He was called time and again in Orderly Room for personal hearing, but failed to do so.

Keeping in view the recommendations of the Enquiry Officer and other material available on record it has been come crystal clear that the defaulter constable deliberately absented himself from duty for a long period and still at large. From perusal of his service record, it has been found that he was enlisted as constable in the year 2011 and during his past service he remained absent for a period of 204 days to which he was awarded punishments of stoppage of Annual Increment and without pay . He is a habitual absentee and does not take interest to serve in Police Department and there is no likelihood of becoming his good Police Officer in future.

Keeping in view the above, I Malik Muhammad Tariq, PSP, Deputy Commandant FRP Khyber Pakhtunkhwa being a competent authority is hereby awarded Major punishment of Removal from service to Constable Salman No. 2126 of FRP HQrs: Peshawar under Police Rules 1975 amended 2014 from the date of his absence i.e. 27.01.2019. However the period of his absence is treated as absence from duty without Pay.

Deputy Commandant,
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar

No. 852-55 /PA dated Peshawar, the 05/07 - /2019.

Copy to the:-

1. Worthy Commandant FRP Khyber Pakhtunkhwa for information please.
2. Accountant /FRP/HQrs: Peshawar.
3. SRC/OAS/FRP HQrs: Peshawar/FMC/ FRP/HQrs: Peshawar with original Enquiry file.

(22) *Ambar - C*
 This order will dispose of the departmental appeal preferred by ex-Constable Salman No. 2126 of FRP HQrs; against the order of Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar issued vide OB No. 874, dated 05.07.2019, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he absented himself from lawful duty with effect from 27.01.2019 till the date of removal from service i.e 05.07.2019 for total period of 05 months 09 days without any leave or prior permission of the competent authority.

In this regard proper departmental proceedings were initiated against him as he was issued Charge Sheet and Statement of Allegations and DSP FRP HQrs, Peshawar was nominated as Enquiry Officer to unearth the actual facts. After completion of all codal formalities the Enquiry Officer submitted his findings, wherein he stated that Charge Sheet and Statement of Allegations were properly served upon the delinquent constable, but he failed to submit his reply within stipulated period and at the end the Enquiry Officer recommended him for ex-party action.

Upon the findings of Enquiry Officer, he was issued Final Show Cause Notice, but he failed to submit his reply. He was called time and again in orderly room for personal hearing but he failed to do so.

From perusal of his service record, it has been found that during his past service he remained absent previously for a long period of 204 days, to which he was awarded punishment of stoppage of annual increment and period of absence was treated as leave without pay.

In the light of the above narrated facts and other material available on record, he was awarded major punishment of removal from service vide office OB No. 874, dated 05.07.2019.

Feeling aggrieved against the impugned order of Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 04.09.2019.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. It is settled proposition of law that the law helps the diligent and not indolent. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force, as he is a habitual absentee, already absented himself for a long period of 204 days previously and subsequently also absented for 05 months and 09 days, there is no prospects of his being reformed. His reinstatement may impinge upon the over all moral and affect adversely the discipline of the force. Thus there doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, I, Sajid Ali PSP Commandant FRP Khyber Pakhtunkhwa Peshawar, being the competent authority, has found no substance in the appeal therefore, the same is rejected/dismissed being meritless.

Order Announced.

Commandant

Frontier Reserve Police

Khyber Pakhtunkhwa, Peshawar

No. 307 /EC, dated Peshawar the 05/09/2019.

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

1 Deputy Commandant FRP, KP, Peshawar. His service record alongwith D file sent herewith

✓ Ex-constable Salman No. 2126 S/O Junais Khan, Police Station Faqir Abad, Village Itikad (Colony 4) Street No 82 House No 2, District Peshawar



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

No. S/ 3243 /20, dated Peshawar the 10/08/2020.

To: The Capital City Police Officer,
Peshawar.

Subject: APPLICATION FOR REINSTATEMENT IN SERVICE.

Memo:

The Competent Authority has examined and filed the application submitted by Ex-F.C Salman No. 2126 of FRP Hqr: Peshawar for re-instatement in service against the punishment of removal from service awarded vide Commandant FRP Khyber Pakhtunkhwa, Peshawar vide order Endst: No. 7617 - 18 / RC, dated 05.07.2019 being badly time barred.

The applicant may please be informed accordingly.

(SYED ANIS-UL-HASSAN)

Registrar,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

سرور سید انیس

Amir C

BETTER COPY

ORDER:

This order will dispose of the departmental appeal preferred by ex-constable Salman No: 2126 of FRP HQrs; against the order of Deputy Commandant FRP, Khyber Pakhtunkhwa Peshawar issued vide OB No: 874, dated 05.07.2019, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he absented himself from lawful duty with effect from 27.01.2019 till the date of removal from service i.e. 05.07.2019 for total period of 05 months 09 days without any leave or prior permission of the competent authority.

In this regard proper departmental proceedings were initiated against him as he was issued Charge Sheet and Statement of Allegations and DSP FRP HQrs Peshawar was nominated as Enquiry Officer to unearth the actual facts. After completion of all codal formalities the Enquiry Officer submitted his findings, wherein he stated that Charge Sheet and Statement of Allegations were properly served upon the delinquent constable, but he failed to submit his reply within stipulated period and at the end the Enquiry Officer recommended him for ex-parte action.

Upon the findings of Enquiry Officer, he was issued Final Show Cause Notice, but he failed to submit his reply. He was called time and again in orderly room for personal hearing but he failed to do so.

From perusal of his service record, it has been found that during his past service, he remained absent previously for a long period of 204 days, to which he was awarded punishment of stoppage of annual increment and period of absence was treated as leave without pay.

In the light of above narrated facts and other material available on record, he was awarded major punishment from service vide office OB No 874, dated 05.07.2019.

Feeling aggrieved against the impugned order of Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 04.09.2019.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. It is settled proposition of law that the law helps the diligent and not indolent. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force, as he is habitual absentee already absented himself for a long period of 204 days previously and subsequently also absented for 05 months and 09 days, there is no prospects of his being reformed. His reinstatement may impinge upon the overall moral and affect adversely the discipline of the force. Thus there doesn't seem any infirmity in the order passed by the competent authority, therefore, no ground exist to interfere in same.

Based on the findings narrated above. I Sajid Ali PSP Commandant FRP Khyber Pakhtunkhwa Peshawar, being the competent authority, has found no substance in the appeal, therefore the same is rejected / dismissed being meritless.

Order Announced.

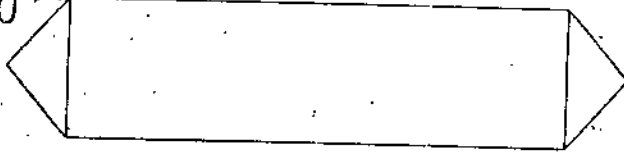
Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar.

No:7____/EC, dated Peshawar the 05/10/2019

Copy of above is forwarded for information and necessary action to the Deputy Commandant FRP, KP, Peshawar. His service record alongwith D file sent herewith.

Ex constable Salman No. 2126 S/o Junais Khan, Police Station Faqir Abad, Village Ittihad Colony, Street No: 08, House No: 3, District Peshawar.

بعد الت حسب CP سرس سر سونل لشمه



اسلام آباد
2020ء منجانب
سیدمان بنام پولس

مورخہ
مقدمہ
دعویٰ
جرم

باعتث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام لپٹا اور کیلئے نام لکھنے اور گوسٹ
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال و دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا ذرا کالت نامہ لکھد یا کہ سندر ہے۔

2020ء

ماہ ستمبر

المرقوم ۰۹

سیدمان
Ex-Constable

کے لئے منظور ہے۔

مقام لپٹا

Accepted
by JAMIC

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1008/2020.

Salman Ex-FC No. 2126, FRP Head Quarter PeshawarAppellant.

VERSUS

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

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES
1.	Para-wise Comments		03
2.	Copy of Service record bad entry	Annexure "A"	03
3.	Charge Sheet	Annexure "B"	01
4.	Final Show Cause Notice	Annexure "C"	01
5.	Rejection Order	Annexure "D"	01
6.	Affidavit		01
7.	Index		01
Total			11


RESPONDENTS

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 11008/2020.

Salman Ex-FC No. 2126, FRP Head Quarter PeshawarAppellant.

VERSUS

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

PARAWISE REPLY BY RESPONDENTS.

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 stands 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. Correct to the extent that the appellant was initially appointed as constable, but subsequently, he was found a habitual absentee as per his service record. The appellant previously remained absent from his lawful duty for a long period of 204 days, without any leave or prior permission from the competent authority and there are 02 bad entries with no good entry in his credit. (Copy of service record regarding absence and bad entries are attached herewith as annexure "A").
2. Incorrect. The appellant absented himself from lawful duty with effect from 27.01.2019 till the date of removal from service i.e 05.07.2019 for total period of 05 months 09 days without any leave or prior permission of the competent authority. The plea of illness of his son taken by the appellant is a propounded story and he had supposed to have taken this plea before the enquiry officer or before the competent authority during the course of enquiry already conducted against him.
3. Incorrect. The appellant while posted at CCP Police Line Peshawar remained absent from his lawful duty without any leave or prior permission of the competent authority. In this regard proper departmental proceedings were initiated against him as he was issued Charge Sheet with Statement of Allegations and DSP FRP HQrs; Peshawar was nominated as Enquiry Officer to unearth the actual facts. The Charge Sheet was served upon him through

special messenger on his home address and his signature was obtained as a token of receipt, but he failed to submit his reply to the Charge Sheet or appear before the enquiry officer. (Copy of Charge Sheet attached herewith as annexure "B") Upon the findings report of Enquiry Officer, he was issued Final Show Cause Notice, but he failed to submit his reply. (Copy of Final Show Cause Notice attached herewith as annexure "C"). He was called time and again in orderly room for personal hearing by the competent authority, but he did not turn up. After fulfillment of all codal formalities he was awarded major punishment of removal from service on 05.07.2019 as per law rules.

4. Incorrect. Departmental appeal submitted by the appellant was thoroughly examined and rejected on sound grounds. A sufficient opportunity for defense was already provided to the appellant as he was summoned and heard in person in Orderly Room held on 04.09.2019 in the office of respondent No. 2, but he failed to present any justification regarding his prolonged absence. Besides, the copy of rejection order has already been provided to the appellant vide office Endst. No. 7617-18/EC, dated 05.09.2019. (Copy of rejection order is attached herewith as annexure "D")
5. Incorrect. The revision petition was submitted by the appellant in very belated stage, therefore rejected on the ground of badly time barred.
6. The appellant has no cause of action to file the instant appeal and he wrongly arrayed the respondents in unsound appeal.

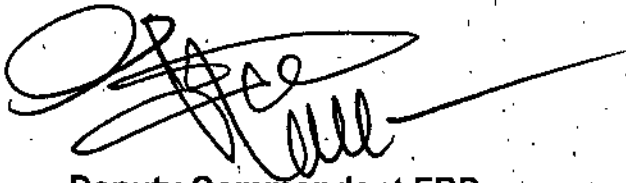
GROUND:-

- A. Incorrect. The orders passed by the respondents in the case of appellant are legally justified and in accordance with law / rules as the same were passed after fulfillment of all codal formalities required as per law / rules.
- B. Incorrect. The appellant was properly proceeded departmentally and the allegations of willful absence was fully established against him by the enquiry officer during the course of enquiry. Thus the penalty awarded to the appellant by the competent authority is legally justified and in accordance with law/rules.
- C. Incorrect. Departmental appeal submitted by the appellant was thoroughly examined and rejected on sound grounds, through a speaking order. Moreover, the appellant was supposed to submit the medical prescriptions before the enquiry officer or before the competent authority during the course of enquiry. The revision petition of the appellant was examined and rejected on the ground of badly time barred.
- D. Incorrect. The appellant was dealt with proper enquiry and after fulfillment of all codal formalities, he was awarded major punishment of removal from service, as per law/rules, which commensurate with the gravity of his gross misconduct.

- E. Incorrect. The appellant was absolutely treated in accordance with law/rules by giving him sufficient and proper opportunities at every level for defense.
- F. The respondents may also be permitted to raise additional grounds at the time of arguments.

PRAYERS:-

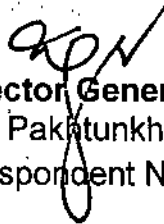
Keeping in view the above facts and circumstances, it is most humbly prayed that the instant service appeal being not maintainable may kindly be dismissed with costs please.



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



Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 04)



Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01 & 02)

15. CENSURES AND PUNISHMENT

1 day L.W.O pay vide OB No 470
2-6-16

COMMANDANT
Frontier Reserve Police
Khyber Pakhtoon Khwa
Peshawar

One day Absent Treated as leave with pay
vide OB 609 date 29.7.016

COMMANDANT

Three days Absent w/o pay & Two days
E. drill vide OB. 972 date 10-11-016

COMMANDANT
Frontier Reserve Police
Khyber Pakhtoon Khwa
Peshawar

Two days Absent w/o pay vide OB. 981
date 14-11-016

COMMANDANT
Frontier Reserve Police
Khyber Pakhtoon Khwa
Peshawar

05 days L.W.O pay OB
24-1-17

Punishment Entry
Name of Soldier
Absent from duty on account of
As a drill punishment 1 days counted as L.W.O Pay
OB No. 1070 dated 5/11/18
COMMANDANT
Frontier Reserve Police
Peshawar

Punishment Entry
Name of Soldier
Absent from duty on account of
As a drill punishment 1 days counted as L.W.O Pay
OB No. 1070 dated 5/11/18
COMMANDANT
Frontier Reserve Police
Peshawar

OB
5-1-2019
Te
del
20A


2

Serial No.

15. CENSURES AND PUNISHMENTS - Contd.

ORDER


Removed from Service under Police Rules 1975 amended 2011 from the date of absence i.e. 27-04-2019. However the period of absence is treated as leave with full pay. vide this office order Enclst. No. 852-55/PA dated 05-07-2019.


COMMANDANT
Frontier Reserve Police
Khyber Pakhtoonkhwa
Peshawar
10/7/19

ORDER

Appeal Reject by Commandant FRP vide Order No 7617-B/EC dated 5-9-2019.


(Copy attached)


COMMANDANT
Frontier Reserve Police
Khyber Pakhtoonkhwa
Peshawar
11/09/19

ORDER.

Constable Salman No. 2126 of FRP HQrs: Peshawar absented himself from duty with effect from 05.10.2018 to 07.11.2018 and again from ~~20.12.2018 to 25.01.2019~~ without any leave/permission of the competent authority. He was issued Charge sheet/statement of allegation and DSP Admn: FRP was appointed as Inquiry Officer. After inquiry the IO, submitted his finding, wherein he recommended the said constable for punishment. He was issued Final Show Cause Notice to which he replied, stating therein that his wife was admitted in Hospital, wherein she birth a child. Later-on his child was also admitted in Hospital. He was called in OR and during his personal hearing he narrated the above storey regarding his wife as well as son illness and requested that he has supported his ailing son and have poor family back grounds. Keeping in view the above the undersigned has taken a lenient view and his absence period is ~~treated as Earned Leave~~ purely on compassionate grounds.

His pay release.


Deputy Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar
07/10/2019

No. 285-87 /PA dated Peshawar the

Copy of above is sent for information & necessary action to the:-

- 1 Accountant FRP HQrs: Peshawar.
- 2 ✓ SRC/OASI FRP HQrs: Peshawar

DSP/HQ

CHARGE SHEET U/S 6(1) (A) POLICE RULES 1975



You Constable Salman No. 2126 of of FRP HQrs: Peshawar is hereby charged for committing the following omission/commissions.

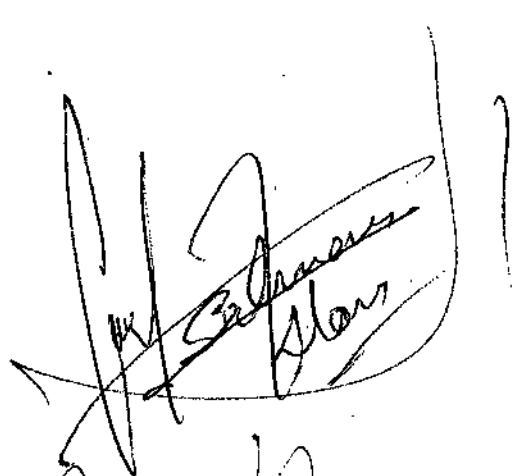
While posted at FRP HQrs: Peshawar absented himself from duty w.e from ~~2701~~ 2019 till date without taking any leave/permission of the competent authority.

You are hereby called upon to submit your written defense against the above charges before the enquiry officer.

Your reply should reach the Enquiry Officer within seven (7) days from date of receipt of this Charge Sheet, failing which ex-parte action shall be taken against you.

Summary of allegations is enclosed herewith.


Deputy Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar



Salman
2019
2126

0310-9493976

17301-8357688-3

FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

I, Deputy Commandant, FRP, KPK as competent authority do hereby serve you Constable Salman No. 2126 of FRP/HQrs, Peshawar.

(1) i- That consequent upon the completion of enquiries conducted against you by DSP/FRP HQrs Peshawar for which you were given full opportunity of hearing.

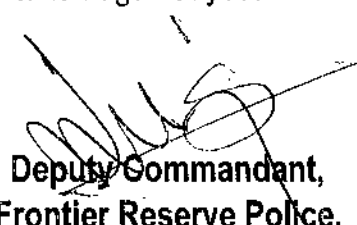
ii- On going through the findings/recommendations of the Enquiry Officers, the material available on record and other connected papers I, am satisfied that you have committed the following acts/omissions per Police Rules 1975.

You Constable Salman No. 2126 of FRP HQrs: Peshawar absented himself from duty with effect from 27.01.2019 till date without any leave/permission of the competent authority. In this connection an enquiry was entrusted to DSP/FRP HQrs Peshawar who after enquiry recommend you for ex-parte action.

(2) Therefore, I, Deputy Commandant, FRP, KPK as competent authority has tentatively decided to impose upon you Major/Minor penalty including dismissal from service under the said Rules.

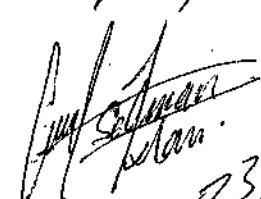
(3) You are, therefore, required to Show Cause as to why not the aforesaid penalty should not be imposed upon you.

(4) If no reply to this Final Show Cause Notice is received within the **15 days** of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and consequently ex-parte action shall be taken against you.


Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.

No. 532 /PA

Dated 08/05/2019.

30-5-19

17301-83576883.
0310-9493976.

ORDER

This order will dispose of the departmental appeal preferred by ex-constable Salman No. 2126 of FRP HQrs; against the order of Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar issued vide OB No. 874, dated 05.07.2019, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he absented himself from lawful duty with effect from 27.01.2019 till the date of removal from service i.e 05.07.2019 for total period of 05 months 09 days without any leave or prior permission of the competent authority.

In this regard proper departmental proceedings were initiated against him as he was issued Charge Sheet and Statement of Allegations and DSP FRP HQrs; Peshawar was nominated as Enquiry Officer to unearth the actual facts. After completion of all codal formalities the Enquiry Officer submitted his findings, wherein he stated that Charge Sheet and Statement of Allegations were properly served upon the delinquent constable, but he failed to submit his reply within stipulated period and at the end the Enquiry Officer recommended him for ex-party action.

Upon the findings of Enquiry Officer, he was issued Final Show Cause Notice, but he failed to submit his reply. He was called time and again in orderly room for personal hearing, but he failed to do so.

From perusal of his service record, it has been found that during his past service he remained absent previously for a long period of 204 days, to which he was awarded punishment of stoppage of annual increment and period of absence was treated as leave without pay.

In the light of the above narrated facts and other material available on record, he was awarded major punishment of removal from service vide office OB No. 874, dated 05.07.2019.

Feeling aggrieved against the impugned order of Deputy Commandant FRP Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 04.09.2019.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. It is settled proposition of law that the law helps the diligent and not indolent. Thus the applicant has been found to be an irresponsible person in utter disregard the discipline of the force, as he is a habitual absentee, already absented himself for a long period of 204 days previously and subsequently also absented for 05 months and 09 days, there is no prospects of his being reformed. His reinstatement may impinge upon the over all moral and affect adversely the discipline of the force. Thus there doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, I, Sajid Ali PSP Commandant FRP Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected/dismissed being meritless.

Order Announced.

S. REJWASI

for meritless order - in record.

No. 1243-44/PA

Date 11/9/19

By: Sajid Ali

Commandant

Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

No 7617-18 /EC, dated Peshawar the 05/09/2019.

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

1. Deputy Commandant FRP, KP, Peshawar. His service record alongwith D file sent herewith.
2. Ex-constable Salman No. 2126 S/O Junais Khan, Police Station Faqir Abad, Village Itihad Colony. Street No. 8. House No. 03 District Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1008/2020.


Salman Ex-FC No. 2126, FRP Head Quarter Peshawar.....Appellant.

VERSUS

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

AFFIDAVIT

I, Ghasan Ullah ASI FRP HQrs; do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments on behalf of Respondents No. 1, 2 & 3 is correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court.


Deponent
Ghassan Ullah
17101-9891560-3

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 11008/2020


Salman Ex-FC No. 2126, FRP Head Quarter Peshawar Appellant.

VERSUS


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

AFFIDAVIT

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.


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


Deputy Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 04)


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No.01, 02)

ATTESTE



05-2022