

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR.**

**Service Appeal No. 2422/2023**

Abid Ali Ex-Constable No. 1743 s/o Umara Khan r/o Mian Khan Mohallah Khoshal  
Khel Baizai Tehsil Katlang District Mardan.....Appellant

**VERSUS**

The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and others  
.....Respondents

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15-03-2024  
Peshawar

S-B

**DSP Legal  
Mardan**

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.**

**Service Appeal No. 2422/2023**

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Khel Baizai Tehsil Katlang District Mardan.....Appellant

**VERSUS**

The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and others  
.....Respondents

**Para-wise comments on behalf of respondents:** Khyber Pakhtunkhwa  
Service Tribunal

**Respectfully Sheweth,**

Diary No. 11744

**PRELIMINARY OBJECTIONS**

Dated 14-03-2024

1. That the appellant has not approached this Hon'ble Tribunal with clean hands.
2. That the appellant has concealed the actual facts from this Hon'ble Tribunal.
3. That the appellant has got no cause of action or locus standi to file the instant appeal.
4. That the appellant is estopped by his own conduct to file the instant Service Appeal.
5. **That appeal of the appellant is badly time barred.**
6. That the appeal is unjustifiable, baseless, false, flawless and vexatious and the same is liable to be dismissed with special compensatory cost in favour of respondents.

**REPLY ON FACTS**

1. Para to the extent of enlistment in Police Department as Constable pertains to record needs no comments.
2. Incorrect. Stance of appellant is baseless, because every Police Officer is under obligation to perform his duty upto the entire satisfaction of his superiors. Moreover, the perusal of service record of the appellant revealed that due to his lethargic attitude his entire service record is tainted with bad entries **(Copy of list of bad entries is attached as Annexure "A")**.
3. Incorrect. Stance taken by the appellant is totally against the material available on record because the complainant of case FIR No. 424 dated 06.11.2022 u/s 302/324/147/148/149 PPC Police Station Baizai hails from District Dir Lower, hence, false and fabrication is immaterial. As the complainant was neither his co-village nor had any relation. Therefore, false implication/involving the appellant is not appealable to a prudent mind. **(Copy of FIR is attached as Annexure-"B")**.
4. Para to the extent of granting bail and subsequent acquittal from the charges is not plausible because the Apex Court of Pakistan has laid down the principle that departmental proceedings and judicial proceedings are two different entities, both can run parallel to each other without affecting the result of each other. This Controversy was resolved by the Apex Court of Pakistan in case titled "**Khalig Dad Vs Inspector General of Police and 02 others**" (2004 SCMR 192" wherein it was held that:-

*"Disciplinary proceedings and criminal proceedings---Difference---Acquittal from criminal case---Effect---Both such proceedings are not interred dependent and can be initiated simultaneously and brought to logical end separately with different conclusions---Criminal proceedings do not constitute a bar for initiation of disciplinary proceedings relevant to Efficiency and Disciplinary Rules---Acquittal in criminal case would have no bearing on disciplinary action".*

5. Correct to the extent that the appellant while posted at Police Station Katlang was involved in a criminal case vide FIR No. 424 dated 06.11.2022 u/s 302/324/147/148/149 PPC Police Station Baizai. On the basis of above, the appellant was issued charge sheet alongwith statement of allegations vide No. 342/PA dated 18.11.2022 & proper departmental enquiry proceedings were initiated by entrusting the same to Miss Resham Jehangir SDPO Sheikh Maltoon. During the course of enquiry, the appellant was contacted time and again to appear before the enquiry officer but neither he appeared before the enquiry officer nor submitted his reply. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended the appellant for ex-parte action vide Office No. 1075/St dated 23.12.2022. Therefore, the appellant was issued Final Show Cause Notice vide No. 13158-59/PA dated 28.12.2022 which was delivered through his cousin on 31.12.2022 to which his reply was not received within the stipulated time (07) days, hence, he was awarded major punishment of dismissal from service which does commensurate with the gravity of misconduct of appellant. It worth to mention here that the copy of Charge Sheet with Statement of Allegations and Final Show Cause Notice were received by Uncle and Cousin of the appellant himself and duly signed the photo copy as token of its receipt **(Copy of served Charge Sheet and Final Show Cause Notice are attached as annexure-"C")**.
6. Correct to the extent that the appellant preferred departmental appeal before the appellate authority which was filed, being bereft of any substance. As the appellant was provided full-fledged opportunity of defending himself but he bitterly failed to produce any cogent proofs/reasons to justify his innocence. Hence, after perusal of entire material available on record coupled with enquiry report as well as the order of punishment, the departmental appeal was filed being devoid of any merit **(Copy of order is attached as annexure-"D")**.
7. Correct to the extent that the appellant preferred Revision Petition but the same was returned as at the same time he approached the Hon'ble Tribunal as well as the Revisional Authority.
8. Para is for the extent to prove however, it is pertinent to mention here that during the course of departmental proceedings, he failed to appear before the Enquiry Officer. It is also added that he did not bother to respond to the Final Show Cause Notice which clearly depicts his lethargic attitude

towards his official duties and stance of his alleged illness also seems to be a concocted one.

9. That the appeal of the appellant is liable to be dismissed on the following grounds amongst the others.

**REPLY ON GROUNDS:**

- A. Incorrect. Plea taken by the appellant is not plausible because the orders passed by the competent authority as well as appellate authority, are after fulfilling of all legal and codal formalities, by providing full-fledged opportunity of defending himself before the competent as well as appellate authority but he bitterly failed to produce any cogent reasons in his defense.
- B. Incorrect. Stance taken by the appellant is totally bereft of any substance because the appellant while posted at Police Station Katlang was involved in a criminal case vide FIR No. 424 dated 06.11.2022 u/s 302/324/147/148/149 PPC Police Station Baizai. On the basis of above, the appellant was issued charge sheet alongwith statement of allegations vide No. 342/PA dated 18.11.2022 & proper departmental enquiry proceedings were initiated by entrusting the same to Miss Resham Jehangir SDPO Sheikh Maltoon. During the course of enquiry, the appellant was contacted time and again to appear before the enquiry officer but neither he appeared before the enquiry officer nor submitted his reply. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended the appellant for ex-parte action vide Office No. 1075/St dated 23.12.2022. Therefore, the appellant was issued Final Show Cause Notice vide No. 13158-59/PA dated 28.12.2022 which was delivered through his cousin on 31.12.2022 to which his reply was not received within the stipulated time (07) days, hence, he was awarded major punishment of dismissal from service which does commensurate with the gravity of misconduct of appellant. It worth to mention here that the copy of Charge Sheet with Statement of Allegations and Final Show Cause Notice were received by Uncle and Cousin of the appellant himself and duly signed the photo copy as token of its receipt.
- C. Incorrect. Stance taken by the appellant is not plausible because after conclusion of departmental enquiry he was issued Final Show Cause Notice vide No. 13158-59/PA dated 28.12.2022, which was delivered through his cousin on 31.12.2022 but he bitterly failed to submit his reply within the stipulated time i.e (07) days (**Copy of receipt is attached as annexure "E"**).
- D. Incorrect. Plea taken by the appellant is baseless because he was issued charge sheet alongwith statement of allegations vide No. 342/PA dated 18.11.2022 & proper departmental enquiry proceedings were initiated by entrusting the same to Miss Resham Jehangir SDPO Sheikh Maltoon.


- E. Incorrect. Stance taken by the appellant is totally bereft of any substance because the plea of audi alteram partem is a misleading. As after issuance of charge sheet alongwith statement of allegations vide No. 342/PA dated 18.11.2022, proper departmental enquiry proceedings were initiated by entrusting the same to Miss Resham Jehangir SDPO Sheikh Maltoon. During the course of enquiry, the appellant was contacted time and again to appear before the enquiry officer but neither did he appear before the enquiry officer nor did he submit his reply. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended him for taking ex-parte action vide Office No. 1075/St dated 23.12.2022. Therefore, the appellant was issued Final Show Cause Notice vide No. 13158-59/PA dated 28.12.2022, which was delivered through his cousin on 31.12.2022 to which his reply was not received stipulated time (07) days, hence, he was awarded major punishment of dismissal from service which does commensurate with the gravity of misconduct of appellant.
- F. Incorrect. Plea taken by the appellant is totally bereft of any substance because during the course of enquiry statements of all concerned were recorded. Moreover, the stance of appellant regarding not providing opportunity of cross examination is also ill based because he did not bother even to join the enquiry proceedings hence, cross examination is totally immaterial.
- G. Incorrect. Plea taken by the appellant is against the law because the Apex Court of Pakistan has laid down the principle that departmental proceedings and judicial proceedings are two different entities, both can run parallel to each other without affecting the result of each other. This Controversy was resolved by the Apex Court of Pakistan in case titled "**Khalig Dad Vs Inspector General of Police and 02 others**" (2004 SCMR 192" wherein it was held that:-
- "Disciplinary proceedings and criminal proceedings---Difference---Acquittal from criminal case---Effect---Both such proceedings are not interred dependent and can be initiated simultaneously and brought to logical end separately with different conclusions---Criminal proceedings do not constitute a bar for initiation of disciplinary proceedings relevant to Efficiency and Disciplinary Rules---Acquittal in criminal case would have no bearing on disciplinary action".*
- H. Incorrect. Stance of the appellant is totally devoid of merit because as discussed earlier the Apex Court of Pakistan has laid down the principle that departmental proceedings and judicial proceedings are two different entities, both can run parallel to each other without affecting the result of each other. This Controversy was resolved by the Apex Court of Pakistan in case titled "**Khalig Dad Vs Inspector General of Police and 02 others**" (2004 SCMR 192" wherein it was held that:-

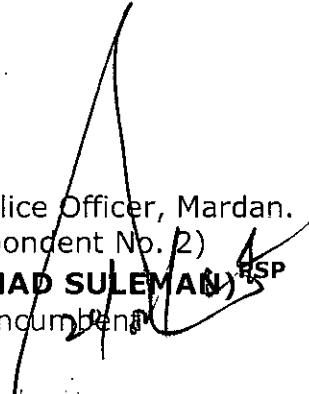
"Disciplinary proceedings and criminal proceedings---Difference---Acquittal from criminal case---Effect---Both such proceedings are not interred dependent and can be initiated simultaneously and brought to logical end separately with different conclusions---Criminal proceedings do not constitute a bar for initiation of disciplinary proceedings relevant to Efficiency and Disciplinary Rules---Acquittal in criminal case would have no bearing on disciplinary action".

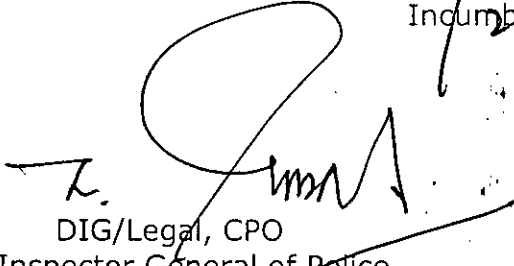
- I. The respondents also seek permission of this honorable tribunal to adduce additional grounds at the time of arguments.

**PRAYER:-**

It is therefore, most humbly prayed that on acceptance of above submissions, appeal of the appellant may very kindly be dismissed **being a badly time-barred** and devoid of merits.

  
District Police Officer, Mardan.  
(Respondent No. 1)  
**(NAJEEB-UR-REHMAN BUGVI)**<sup>PSP</sup>  
Incumbent

  
Regional Police Officer, Mardan.  
(Respondent No. 2)  
**(MUHAMMAD SULEMAN)**<sup>PSP</sup>  
Incumbent

  
DIG/Legal, CPO  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 3)  
**(DR. MUHAMMAD AKHTAR ABBAS)**<sup>PSP</sup>  
Incumbent

**BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,  
PESHAWAR.**

**In Re S.A No. 2422/2023**

Abid Ali

**VERSUS**

Inspector General of Police Khyber Pakhtunkhwa & others

**Reply to the application for condonation of delay:-**

**Respectfully Sheweth,**

1. That the application filed by the applicant before this Honorable Tribunal may kindly be dismissed being a **badly time-barred**.
2. Incorrect. Para already explained in the ground of appeal, needs no comments.
3. Incorrect. Stance taken by the applicant is totally bereft of any substance because he while posted at Police Station Katlang was involved in a criminal case vide FIR No. 424 dated 06.11.2022 u/s 302/324/147/148/149 PPC Police Station Baizai. On the basis of above, the applicant was issued charge sheet alongwith statement of allegations vide No. 342/PA dated 18.11.2022 & proper departmental enquiry proceedings were initiated by entrusting the same to Miss Resham Jehangir SDPO Sheikh Maltoon. During the course of enquiry, the applicant was contacted time and again to appear before the enquiry officer but neither he appeared before the enquiry officer nor submitted his reply. However, after fulfillment of all legal and codal formalities, the Enquiry Officer recommended the applicant for ex-parte action vide office No. 1075/St dated 23.12.2022. Therefore, the applicant was issued Final Show Cause Notice vide No. 13158-59/PA dated 28.12.2022 which was delivered through his cousin on 31.12.2022 to which his reply was not received within the stipulated time (07) days, hence, he was awarded major punishment of dismissal from service which does commensurate with the gravity of misconduct of applicant. It worth to mention here that the copy of Charge Sheet with Statement of Allegations and Final Show Cause Notice were received by Uncle and Cousin of the applicant himself and duly signed the photo copy as token of its receipt.
4. Incorrect, plea taken by the applicant is whimsical/concocted rather fanciful hence, liable to be set at naught. As the apex court of Pakistan has held that the question of limitation cannot be considered a "technicality" simpliciter as it has got its own significance and would have substantial bearing on merits of the case. *Reliance is placed on the case of „Muhammad Islam versus Inspector General of Police, Islamabad and others“ (2011 SCMR 8). In an another judgment it has been held that the law of limitation must be followed strictly. In this regard reliance is placed on the dictum laid down in Chairman, District Screening committee, Lahore and another v. Sharif Ahmad Hashmi (PLD 1976 SC 258), S. Sharif Ahmad Hashmi v. Chairman, Screening Committee Lahore and another (1978 6 Civil Revision*

No.3364 of 2011 SCMR 367), *Yousaf Ali v. Muhammad Aslam Zia and 2 others* (PLD 1958 SC (Pak) 104); *Punjab Province v. The Federation of Pakistan* (PLD 1956 FC 72), *Muhammad Swaleh and another v. Messers United Grain and Fodder Agencies* (PLD 1949 PC 45), *Hussain Bakhsh and others v. Settlement Commissioner and another* (PLD 1969 Lah. 1039), *Nawab Syed Raunaq Ali and others v. Chief Settlement commissioner and others* (PLD 1973 SC 236), *Chief Settlement Commissioner, Lahore v. Raja Muhammad Fazil Khan and other* (PLD 1975 SC 331), *WAPDA v. Abdul Rashid Bhatti*, (1949 SCMR 1271), *Inspector General of Police, Balochistan v. Jawad Haider and another* (1987 SCMR 1606), *WAPDA v. Aurganzeb* (1988 SCMR 1354), *Muhammad Naseem Sipra v. Secretary, Government of Punjab* (1989 SCMR 1149), *Muhammad Ismail Memon v. Government of Sindh and another* 1981 SCMR 244), *Qazi Sardar Bahadar v. Secretary, Ministry of Health, Islamabad and others* (1984 SCMR 177), *Smith v. East Elloe Rural District Council and others* (1956 AC 736), *Province of East Pakistan and others v. Muhammad Abdu Miah* (PLD 1959 SC (Pak), 276 and *Mehr Muhammad Nawaz and others. V. Government of Punjab and others* (1977 PLC (C.S.T) 165) and *Fazal Elahi Siddiqi v. Pakistan* (PLD 1990 SC 692)".

5. Para is for the extent to prove however, it is pertinent to mention here that during the course of departmental proceedings, he failed to appear before the Enquiry Officer. It is also added that he did not bother to respond to the Final Show Cause Notice which clearly depicts him lethargic attitude towards his official duties and stance of his alleged illness also seems to be a concocted one.
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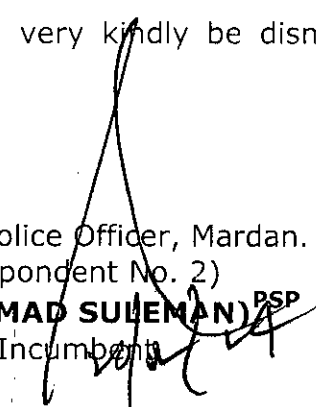


bearing on merits of the case. *Reliance is placed on the case of „Muhammad Islam versus Inspector General of Police, Islamabad and others“ (2011 SCMR 8). In an another judgment it has been held that the law of limitation must be followed strictly. In this regard reliance is placed on the dictum laid down in Chairman, District Screening committee, Lahore and another v. Sharif Ahmad Hashmi (PLD 1976 SC 258), S. Sharif Ahmad Hashmi v. Chairman, Screening Committee Lahore and another (1978 6 Civil Revision No.3364 of 2011 SCMR 367), Yousaf Ali v. Muhammad Aslam Zia and 2 others (PLD 1958 SC (Pak) 104), Punjab Province v. The Federation of Pakistan (PLD 1956 FC 72), Muhammad Swaleh and another v. Messers United Grain and Fodder Agencies (PLD 1949 PC 45), Hussain Bakhsh and others v. Settlement Commissioner and another (PLD 1969 Lah. 1039), Nawab Syed Raunaq Ali and others v. Chief Settlement commissioner and others (PLD 1973 SC 236), Chief Settlement Commissioner, Lahore v. Raja Muhammad Fazil Khan and other (PLD 1975 SC 331), WAPDA v. Abdul Rashid Bhatti, (1949 SCMR 1271), Inspector General of Police, Balochistan v. Jawad Haider and another (1987 SCMR 1606), WAPDA v. Aurganzeb (1988 SCMR 1354), Muhammad Naseem Sipra v. Secretary, Government of Punjab (1989 SCMR 1149), Muhammad Ismail Memon v. Government of Sindh and another 1981 SCMR 244), Qazi Sardar Bahadar v. Secretary, Ministry of Health, Islamabad and others (1984 SCMR 177), Smith v. East Elloe Rural District Council and others (1956 AC 736), Province of East Pakistan and others v. Muhammad Abdu Miah (PLD 1959 SC (Pak), 276 and Mehr Muhammad Nawaz and others. V. Government of Punjab and others (1977 PLC (C.S.T) 165) and Fazal Elahi Siddiqi v. Pakistan (PLD 1990 SC 692)“.*

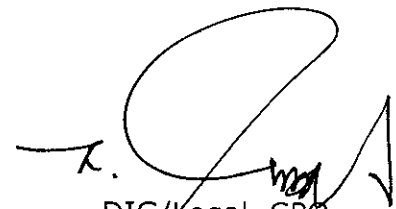
Keeping in view the above submission, it is humbly prayed that application of the applicant regarding condonation of delay may very kindly be dismissed please.



District Police Officer, Mardan.  
(Respondent No. 1)  
**(NAJEEB-UR-REHMAN BUGVI)**<sup>PSP</sup>  
Incumbent



Regional Police Officer, Mardan.  
(Respondent No. 2)  
**(MUHAMMAD SULEMAN)**<sup>PSP</sup>  
Incumbent



DIG/Legal, CPO  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 3)

**(DR. MUHAMMAD AKHTAR ABBAS)**<sup>PSP</sup>  
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**Service Appeal No. 2422/2023**

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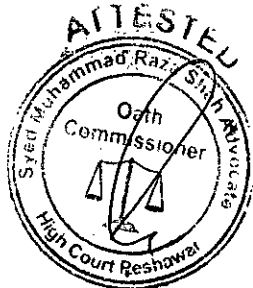
**COUNTER AFFIDAVIT.**

We, the respondents do hereby declare and solemnly affirm on oath that the contents of the Para-wise comments in the service appeal cited as subject are true and correct to the best of our knowledge and belief and nothing has been concealed from this Honorable Tribunal. 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.

*Najeeb*

District Police Officer, Mardan:  
(Respondent No. 1)

**(NAJEEB-UR-REHMAN BUGVI)<sup>PSP</sup>**  
Incumbent



17 MAR 2024

14. COMMENDATORY ENTRIES — Contd.

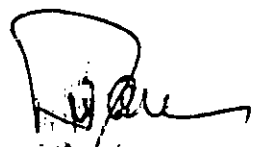
Serial No.

1672

Forwarded him Major punishment  
of dismissal from service with effect  
from 06-11-22 with immediate effect

OB No = 89

Dated = 12-01-23

  
[Illegible text]

*based*

15. CENSURES AND PUNISHMENTS.

ORDER.

Being charged in case vide FIR NO 1424  
 dt. 6-11-2022 A/S 302/324/147/148/149  
 Ppc ps Baizai A is hereby placed  
 under suspension and closed to police  
 lines Mardan, with immediate effect

OBNO 2390  
 dt. 24-11-2022

DPO / Mardan  
 A

Handwritten signature and stamp, possibly "Legal Officer".

16. CENSURES AND PUNISHMENTS. --- Contd.

2 days extra drill for his absence

C.B. No. 1208  
22-5-14

DPO/MR

2 days extra drill for his absence

C.B. No. 1378  
10-6-14

DPO/MR

Hand

LEGAL  
MAGISTR

**16. LEAVE, ABSENCE AND BREAKS IN SERVICE.**  
 All Periods not counting as "approved service" to be entered in red ink.

1. Date		2. Extent			3. No. Of District Order	4. Description of leave i.e privilege hospital, sick leave or of absence, or forfeiture of approved service.
From	To	Years	Months	Days		
				①	<u>1208</u> 22-5-14	Leave w/o pay — DPO/MR
				①	<u>1378</u> 10-6-14	— a — DPO/MR
				③①	<u>769</u> 24-4-15	E/Leave — DPO/MR
				③①	<u>1794</u> 6-10-15	E/Leave — DPO/MR
				①	<u>80</u> 5-1-16	Leave w/o pay — DPO/MR
				①	<u>80</u> 5-1-16	— a — DPO/MR
				①	<u>557</u> 1-3-16	— a — DPO/MR
				①	<u>1670</u> 25-4-16	— a — DPO/MR, AMR
				③①	<u>1158</u> 06-07-2021	E/Leave — DPO/MRD
				①④	<u>1839</u> 12-10-2021	E/Leave — DPO/MRD

*Handwritten notes:*  
 used  
 LEGAL  
 MFR



میں نے اس کو دیکھا ہے۔ یہ ایک عجیب و غریب شخص ہے۔

1- اس شخص کے بارے میں کوئی معلومات نہیں ہیں۔

2- اس شخص کے بارے میں کوئی معلومات نہیں ہیں۔

3- اس شخص کے بارے میں کوئی معلومات نہیں ہیں۔

4- اس شخص کے بارے میں کوئی معلومات نہیں ہیں۔

5- اس شخص کے بارے میں کوئی معلومات نہیں ہیں۔

6- اس شخص کے بارے میں کوئی معلومات نہیں ہیں۔

7- اس شخص کے بارے میں کوئی معلومات نہیں ہیں۔

8- اس شخص کے بارے میں کوئی معلومات نہیں ہیں۔

9- اس شخص کے بارے میں کوئی معلومات نہیں ہیں۔

10- اس شخص کے بارے میں کوئی معلومات نہیں ہیں۔

ASi/PS/B21  
6-11-022

یہ نوٹ ہندہ کا دستخط ہو گا یا اس کی مہر نشان لگایا جائے گا۔ اور اسے تحریر کنندہ ابتدائی اطلاع کا دستخط بطور تصدیق ہو گا۔ حروف الف یا ب سرخ روشنائی سے بالقابل نام پر  
میں نے اس کو دیکھا ہے۔ یہ ایک عجیب و غریب شخص ہے۔



Better copy



پولیس فارم نمبر 24-5 (1)

سیریل نمبر: --000666

ابتدائی اطلاعی رپورٹ نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 154 مجموعہ ضابطہ فوجداری

نمبر: 424/22 تھانہ: بائیزی ضلع: مردان ای ٹیک نمبر 00000 تاریخ و وقت و قوعہ: 05-11-2022 10:40 PM

6 تھانہ سے روائگی کی تاریخ بوقت: بہ سنیل ڈاک

بوالد رپٹ نمبر (7)

06-11-2022 12:50 AM

1 تاریخ و وقت رپورٹ

وقاص الدین ولد غلام محی الدین، پتہ: تیمر گرہ قلاگٹی، پیشہ: میگر  
فون نمبر: 03012573836

2 نام و سکونت اطلاع دہندہ مستغیث

3 مختصر کیفیت جرم (معد دفعہ) و مال اگر کچھ کھو گیا ہے

عجرم:

302 ت پ

324 ت پ

147 ت پ

148 ت پ

149 ت پ

15AA

ایزاد: 147: ضمنی نمبر: 1 تاریخ: 06-11-2022

ایزاد: 148: ضمنی نمبر: 1 تاریخ: 06-11-2022

ایزاد: 149: ضمنی نمبر: 1 تاریخ: 06-11-2022

ایزاد: 15AA: ضمنی نمبر: 1 تاریخ: 06-11-2022

مین موٹروے بمقام باہوزئی انٹر چینج حدود تھانہ بائیزی

4 جائے وقوعہ و فاصلہ تھانہ سے اور سمت

5 کاروائی متعلقہ تفتیش اگر اطلاع درج کرنے میں کچھ توقف ہو اہو تو اس کی بطور سپیش رپورٹ وجہ بیان کی جاوے

03469361840

ٹیلی فون نمبر:

عہدہ: ASI

بیلٹ نمبر: 533

دستخط: Jehangir

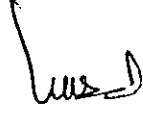
(ابتدائی اطلاع نیچے درج کریں)

مراسلہ موصولہ منجانب زیور خان نمبر IP/SPO S072 موٹروے پولیس بدست کنسٹیبل اظہار علی نمبر J-2467 درج ذیل ہے بحضرت آفسرانچارج SHO صاحب تھانہ بائیزی ضلع مردان مضمون مراسلہ آج مورخہ 5.11.2022 کو حسب اطلاع ہسپتال بیٹ خیلہ آکر ایمر جنسی وارڈ میں بیدوں پر پر مقتول رحیم الدین بعمربقربا 41/42 سال و مجروح وقاص الدین بعمربقربا 33 سال پسران غلام محی الدین ساکنان تیمر گرہ قلاگٹی پڑے پاکر مجروح وقاص الدین کا ہوش و خواص درست ہے۔ بوقت صدر بجر رپورٹ کرتا ہے کہ ہروز میں معد برادر ام مقتول رحیم الدین بہ سواری کو سٹر نمبری CAA4257 پشاور سے تیمر گرہ آرہے تھے۔ رستے میں بدوران سفر سیاسی بحث و مباحثہ ملزم نامہ مسکن نام معلوم سے تکرار ہوا۔ جو کہ بعد میں بت ہاتھ پائی تک پہنچ کر ملزم نامہ و مسکن نامہ معلوم نے واقعات کے نسبت اپنے دیگر ساتھیوں، رشتہ داران کو بذریعہ موبائل فون کل کر کے باہوزئی انٹر چینج آنے کو کہا۔ جو نہی کو سٹر نمبری بالا بوقت صدر بجر بمقام بالا پہنچ کر تو دیگر پانچ کسان ملزمان بہ اسمائے نام معلوم بہ مسلح بہ ڈنڈوں لیس بہ اسلحہ تھے۔ ملزمان کو سٹر نمبری بالا کو زبردستی کھڑا کر کے ملزمان میں معد برادر ام کیساتھ آمادہ شرفساد ہو کر ہم پر لاقھوں مکھوں ڈنڈوں سے واریں کر کے دوران شرفساد ایک ملزم جو سامنے آنے پر شناخت کر سکتا ہوں نے اسلحہ آتشیں سے میں معد برادر ام پر کو سٹر میں بہ ارادہ قتل فائرنگ کر کے جن کے فائرنگ سے برادر ام لگ کر موقع پر جاں بحق ہوا۔ جبکہ میں بائیں بانو پر لگ کر شدید زخمی ہوا ہوں۔ ملزمان کیساتھ سابقہ عداوت نہیں ہے۔ لبتہ دوران سفر تکرار شرفساد ہوئی ہے۔ وقوعہ کو سٹر میں ڈرائیور کنڈیکٹر کے علاوہ دیگر سواریوں کا چشم دید ہے۔ پس میں ملزمان نامہ و مسکن نامہ معلوم کے خلاف بالا واقعات کا عویدار ہوں۔ العبد دستخط اردو وقاص الدین کاروائی پولیس حسب گفتہ

سائل نے مجروح کا رپورٹ حرف بہ حرف درج بالا ہو کر سائل نے بعد تسلی زیزر پورٹ دستخط آردو خود ثبت کی۔ جسکا میں تصدیق کرتا ہوں۔ کہ مجروح  
وقاص الدین کے نقشہ ضرر بمطابق زخمت جبکہ مقتول کے نقشہ ضرر کاغذات بمطابق زخمت مرتب کر کے حوالہ آن ڈیوٹی ڈاکٹر نوید عالم صاحب  
کیلگی۔ سائل مجروح کے رپورٹ سے صورت جرم بالا کا کاپائی جا کر برخلاف 5،6 ملزمان نام و مسکن نامعلوم کے مراسلہ بعرض قانچی مقدمہ بدست کنسٹیبل  
اظہار علی نمبر J-2467 ارسال تھانہ ہے تفتیش کیجاوے۔ دستخط انگریزی زیور خان IP/SPO S072 موٹروپے لیس مورخہ 5.11.2022 کاروائی  
تھانہ پس آمدہ مراسلہ حرف بہ حرف درج صدر ہو کر پرچہ جرم بالا مرتب ہو کر نقول FIR معہ مراسلہ بمراہ تفتیش حوالہ انچارج شعبہ تفتیش کئے جاتے ہیں  
۔ جبکہ آفسران بالا صلابان کو بطور سیشنل رپورٹ اطلاع دی جاتی ہے۔ بطور سیشنل پرچہ گزارش ہے

ASI Jehangir

06-11-2022

  
Legal  
Mardan



**OFFICE OF THE  
DISTRICT POLICE OFFICER,  
MARDAN**


Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: dpomdn@gmail.com


2022

**CHARGE SHEET**

I, HAROON RASHID KHAN (PSP), District Police Officer Mardan, as competent authority, hereby charge Constable Abid Ali No.1743, while posted at PS Katlang Mardan (now under suspension Police Lines Mardan), as per attached Statement of Allegations

1. By reasons of above, you appear to be guilty of misconduct under Police Rules, 1975 and have rendered yourself liable to all or any of the penalties specified in Police Rules, 1975.
2. You are, therefore, required to submit your written defense within 07 days of the receipt of this Charge Sheet to the Enquiry Officer, as the case may be.
3. Your written defense, if any, should reach 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, ex-parte action shall follow against you.
4. Intimate whether you desired to be heard in person:

  
(Haroon Rashid Khan) T.ST/PSP  
District Police Officer Mardan

  
Mardan

0343 - 1737117

~~0343~~

لن ٥٠٠٠٠٠ ١٠٠٠٠٠٠

١٠٠٠٠٠٠



**OFFICE OF THE  
DISTRICT POLICE OFFICER,  
MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: dpomdn@gmail.com

2022

No. 342 /PA

Dated 18/11/2022

**DISCIPLINARY ACTION**

I, HAROON RASHID KHAN (PSP), District Police Officer Mardan, as competent authority am of the opinion that Constable Abid Ali No.1743, himself liable to be proceeded against, as he committed the following acts/omissions within the meaning of Police Rules 1975.


**STATEMENT OF ALLEGATIONS**

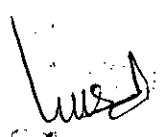
Whereas, Constable Abid Ali No.1743, while posted at PS Katlang Mardan (now under suspension Police Lines Mardan), has been charged in a case vide FIR No.424 dated 06-11-2022 U/S 302/324/147/148/149 PPC Police Station Baizai.

For the purpose of scrutinizing the conduct of the said accused official with reference to the above allegations, Madam Resham Jehangir SDPO/Sh: Maltoon is nominated as Enquiry Officer.

The Enquiry Officer shall, in accordance with the provision of Police Rules 1975, provide reasonable opportunity of hearing to the accused Police Official, record/submit her findings and make within (30) days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused Official.

Constable Abid Ali is directed to appear before the Enquiry Officer on the date + time and place fixed by the Enquiry Officer.

  
(Haroon Rashid Khan) T.ST/PSP  
District Police Officer Mardan

  
OSA Legal  
Mardan

2922

OFFICE OF THE  
DEPUTY SUPERINTENDENT OF POLICE  
SMT CIRCLE.

Tele No.0937-841806 Gmail:sdpo.smt@gmail.com

24/11 St.

9555 مورخہ

بجانب: بخدمت ایس۔ ایچ۔ او صاحب تھانہ بائیزئی مردان

بنام: کنسٹیبل عابد علی No 1734

عنوان: پروانہ بابت اطلاع دہی

بکار سرکار تحریر ہے کہ کنسٹیبل عابد علی No 1734 متعلقہ تھانہ کالنگ مردان جو کے مقدمہ علت 424 مورخہ 2022-11-206 م  
دی گئی گروہ نہ تو اپنا چارج شیٹ وصول کرنے آتا ہے اور نہ ہی انکو ذریعہ انفریکٹ سنانے پیش ہو جاتا ہے۔ چونکہ مذکورہ کنسٹیبل آپ کے علاقہ اختیار کا  
ہو گیا ہے۔ برائے مہربانی چارج شیٹ کی کاپی اس پر تقسیم کر کے پروانہ ہذا پر وصولی کی العبد شہت کر کے پروانہ بعد از قبیل واپس ارسال دفتر کریں

*(Handwritten signature)*

(انکواری آفیسر)

اے ایس پی صاحبہ شیخ ملتون سرکل مردان

میں چارج شیٹ نمبر 11/8/22/PA/421 میں عابد علی 1734  
کو ہجرت اور باقیہ رت کا پانڈ سوشل

CMIC

M. 0937-841806

*(Handwritten signature)*  
01-12-2022

USP Legal  
Wardan

امید ہے کہ ان کو عارف اللہ

16101-1169455-9

رشتہ

حجا

PA/DP

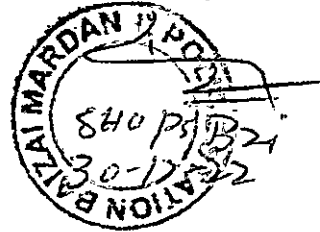
PA/DP

صاحب عالی  
تعمیر سے متعلقہ مہیا دہ ہمالیہ فیلڈ آفیس - مذکورہ عائد  
جنرل جرم الشکا ریاز - سسر آفیس کے پیش معیہ بالسرحد  
وہ ڈیڑا از جنیل سے تعمیر کر کے اہل قضا و قید ارسال فرماتے



AS: ps: B24  
29-12-22

صاحب عالی  
ڈیڑا ریاز سے تفصیل اور قابل ملاحظہ ہے



لکھنا

PSP Legal  
Mardan

**OFFICE OF THE  
DISTRICT POLICE OFFICER,  
MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: [dpomdn@gmail.com](mailto:dpomdn@gmail.com)

2022

No. 15158-58 /PA

Dated 20/12/2022

**FINAL SHOW CAUSE NOTICE**

**Constable Abid Ali, No.1743**, while posted at PS Katlang (now under suspension Police Lines Mardan), have been charged in a case vide FIR No.424 dated 06-11-2022 U/S 302/324/147/148/149 PPC Police Station Baizai.

To ascertain facts, a proper departmental enquiry against you was conducted through Miss Resham Jehangir SDPO/Sheikh Maltoon vide this office Statement of Disciplinary Action/Charge Sheet No.342/PA, dated 18-11-2022, who (EO) after fulfillment necessary process, submitted her findings to this office vide her office letter No.1075/St dated 23-12-2022, holding responsible you of gross misconduct & recommended for ex-parte action.

Therefore, it is proposed to impose Major/Minor penalty as envisaged under Rules 4 (b) of the Khyber Pakhtunkhwa Police Rules 1975.

Hence, I Haroon Rashid Khan (PSP) District Police Officer Mardan. in exercise of the power vested in me under Rules 5 (3) (a) & (b) of the Khyber Pakhtunkhwa Police Rules 1975 call upon you to Show Cause Finally as to why the proposed punishment should not be awarded to you.

Your reply shall reach this office within 07 days of receipt of this Notice. failing which, it will be presumed that you have no explanation to offer.

You are liberty to appear for personal hearing before the undersigned.

Received by

37361-7828979-7  
0347-9602696

Dated: 31/12/2022

(Haroon Rashid Khan) T.ST/PSP  
District Police Officer, Mardan.

Copy to SHO PS Baizai (Attention Moharrar) to deliver this notice upon Constable Abid Ali (0343-1959117) Son of Umar Khan resident of Mohalla Khushkhal Khel Mian Khan or any of his closed family member & the receipt thereof shall be returned to this office within (05) days positively for onward necessary action





افغان مسلح افغانوں نے فدرال فورسز کو کوشش کو زندہ دہی بنا دیا اور  
بعد مندرجہ افراد کو کوشش میں دراصل سوار صدر سے شائبہ  
پیدھم دونوں بدادوں پیدھم دونوں سے گذارے شروع  
ان افراد میں سے ایک نے سوال نکال کر پیدھم دونوں پیدھم  
کہ ارادہ قتل فائرنگ شروع کی تھی علیہذا مذکورہ فائرنگ  
میں بائیں جانب پیرنگ نہ رہی تھی جبکہ پیدھم دونوں پیدھم  
الذکر فائرنگ میں گرتے گرتے پیدھم پیدھم  
خان کو پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم  
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مذکورہ کو کوشش میں پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم  
خان تھا صدر کے اطراف پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم  
خان، سردار اولاد شمس خان پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم  
علی ولد شمس خان پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم  
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فائرنگ کرنے کی شرط تھی پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم  
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صدر پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم پیدھم

حصہ

بیان اپنی منزل فریڈ  $\frac{142}{204}$  کھانا پکانا

فریڈ فریڈ کیا جاتا ہے کہ  $\frac{424}{22}$  324-147-148-149

کھانا پکانا میں کھانا پکانا میں کھانا پکانا  
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11-12-022  
POLICE STATION

1000

بیان فوائد عالم اکیڈمی ہائیر سیکنڈری

424

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95-12-022

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22

PP 10/10/2022  
43

DEPARTMENTAL ENQUIRY AGAINST CONSTABLE ABID ALI NO

Kindly refer to your office Memo: No.342/PA dated 18.11.2022 on the subject stated above.

②

ALLEGATIONS:

Whereas, Constable Abid Ali No 1743 while posted at PS Katlang Mardan (Now under suspension police line Mardan), has been charged in case vide FIR No. 424 dated 06.11.2022 u/s 302,324,147,149 PPC Police Station Baizai.

PROCEEDINGS:

The instant inquiry was marked to undersigned to dig out the real fact. In this connection Constable Abid Ali No 1743 was called to the office of the undersigned for serving the charge sheet upon him but he failed to do so. Later on 24.11.2022 a written parwana regarding serving charge sheet on alleged constable Abid Ali No 1743 has been issued from the office of undersigned to SHO Baizai as the said constable having residence in jurisdiction of police station Katlang. Which was received back to this office on 01.12.2022 after compliance, Beside this a written parwana has also been sent to In-charge control room to inform him but till date he neither produced himself before the undersigned (parwana is attached) nor submit his written statement.

STATEMENT OF SI NAVEED ALAM KHAN I.O OF THE CASE.

According the statement of I.O of the case the complainant of the case waqas U Deen s/o Ghulam U Deen r/o Tamarghar charged unknown accused for the murder of his brother Raheem U Deen and also injured him on which case FIR No. 424 dated 06.11.2022 u/s 302,324,147,149 PPC Police Station Baizai. And handed over to him for further investigation during the course of investigation the complainant point out that the above mentioned offence was committed by accused 1. Haider Ali, 2. Constable Abid Ali, 3. Yasir ss/o Imran 4. Shukat Ali 5. Sardar Ali, and 6. Ahmed Ali ss/o Shamsi Khan r/o Maina Khan. Accused Shukat Ali and Yasir have been arrested while weapon of offence was also recovered. While the rest of accused are still at large including constable Abid Ali No 1743. So proceeding u/s 512 Crpc has been carried out against them and declared as proclaimed offender.

STATEMENT OF HC MUZAMAIL KHAN MUHRARR OF PS BAIZAI.

In this regard Statement HC Muzamail Khan MHC of Police station Baizai was also recorded which reveal that constable Abid Ali No 1743 has been charged in case vide FIR No 424 dated 06.11.2022 u/s 302,324,147,149 PPC Police Station Baizai. He become absconded after the commission of offence till date. So proclamation proceeding has been carried out against him.

CONCLUSION:

From enquiry, statement recorded and circumstances, it transpired that the defaulter official constable Abid Ali No. 1743 found guilty as he not only attending the office of undersigned for enquiry proceeding and also avoiding his law full arrest in case vide FIR No 424 dated 06.11.2022 u/s 302,324,147,149 PPC Police Station Baizai.

RECOMMENDATION:

It is therefore recommended that Ex-Parte action may be taken against the alleged Constable Abid Ali No 457, if agreed. please

Submitted please..

PA ( )

Issue FSCN

(Miss Resham Jehangir)PSP  
Sub, Divisional Police Officer,  
S.M.T. Citele.

DSP Legal  
Mardan

No. 1075 /St  
Dated 23/12/2022

DIG/MDR  
26/12/22



**OFFICE OF THE  
DISTRICT POLICE OFFICER,  
MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: dpomdn@gmail.com

2022

No. 15158-58 /PA

Dated 20/12/2022

**FINAL SHOW CAUSE NOTICE**

**Constable Abid Ali No.1743**, while posted at PS Katlang (now under suspension Police Lines Mardan), have been charged in a case vide FIR No.424 dated 06-11-2022 U/S 302/324/147/148/149 PPC Police Station Baizai.

To ascertain facts, a proper departmental enquiry against you was conducted through Miss Resham Jehangir SDPO/Sheikh Maltoon vide this office Statement of Disciplinary Action/Charge Sheet No.342/PA dated 18-11-2022, who (EO) after fulfillment necessary process, submitted her findings to this office vide her office letter No.1075/St dated 23-12-2022, holding responsible you of gross misconduct & recommended for ex-parte action.

Therefore, it is proposed to impose Major/Minor penalty as envisaged under Rules 4 (b) of the Khyber Pakhtunkhwa Police Rules 1975.

Hence, I Haroon Rashid Khan (PSP) District Police Officer Mardan, in exercise of the power vested in me under Rules 5 (3) (a) & (b) of the Khyber Pakhtunkhwa Police Rules 1975 call upon you to Show Cause Finally as to why the proposed punishment should not be awarded to you.

Your reply shall reach this office within 07 days of receipt of this Notice, failing which; it will be presumed that you have no explanation to offer.

You are liberty to appear for personal hearing before the undersigned.

Received by [Signature] 37361-7828979-7

Dated: 31/12/2022

[Signature]  
(Haroon Rashid Khan) T.ST/PSP  
District Police Officer, Mardan.

Copy to SHO PS Baizai (Attention Moharrar) to deliver this notice upon Constable Abid Ali (0343-1959117) Son of Umar Khan resident of Mohalla Khushkhal Khet Mian Khan or any of his closed family member & the receipt thereof shall be returned to this office within (05) days positively for onward necessary action

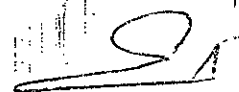
[Signature]

[Signature]  
District Police Officer, Mardan

PA/DPO

RTM  
PA/DI  
ALLP

دعا - عالی  
تعمیر کے سلسلے میں رہنے والے افراد کے لئے - مذکورہ عام  
جرم کے جرم الشہارہ کے لئے - سہ ماہی کے پیش معیار کے تحت  
و دیگر ذیلی جرم سے تعمیر کے لئے اور اس کے تحت

  
ASI PS B2  
29-12-22

UP - عالی  
دکتر ASI تعمیر اور قابل نگرانی کے

STATION BAZAIR MARDAN  
840 PS B2  
30-12-22

Legal  
Borden



**OFFICE OF THE  
DISTRICT POLICE OFFICER,  
MARDAN**

Tel No. 0937-9230109 & Fax No. 0937-9230111  
Email: dpomdn@gmail.com

2023

24

Dated 16/1/2023

No. 465-1/PA

**ORDER ON ENQUIRY OF CONSTABLE ABID ALI NO.1743**

This order will dispose-off a Departmental Enquiry under Police Rules 1975, initiated against Constable Abid Ali No.1743, under the allegations that while posted at PS Katlang (now under suspension Police Lines Mardan), was placed under suspension vide this office OB No.2390 dated 14-11-2022, issued vide order/endorsement No.6484-88/OSI dated 15-11-2022, on account of charging in a case vide FIR No.424 dated 06-11-2022 U/S 302/324/147/148/149 PPC Police Station Baizai.

To ascertain facts, Constable Abid Ali was proceeded against departmentally through Miss Resham Jehangir SDPO Sheikh Maltoon vide this office Statement of Disciplinary Action/Charge Sheet No.342/PA dated 18-11-2022, who (E.O) after fulfillment necessary process, submitted her Finding Report to this office vide her office letter No.1075/St dated 23-12-2022, holding responsible the delinquent official of gross misconduct on the eve of not attending her office, therefore, recommended him for ex-parte action.

Constable Abid Ali was served with a Final Show Cause Notice, under Khyber Pakhtunkhwa Police Rules-1975, issued vide this office No.13158-59/PA dated 28-12-2022 through his cousin Yasir Mehmood on 31-12-2022, to which he was bound to submit his reply to this office within stipulated time of (07) days, but with non-compliance till-date, meaning that he has nothing to offer in his defense.

**Final Order**

In the light of above discussion, I am of the considered opinion that the allegations leveled against Constable Abid Ali are true/genuine, therefore, awarded him major punishment of dismissal from service with effect from 06-11-2022 with immediate effect, in exercise of the power vested in me under Police Rules-1975.

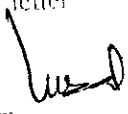
OB No. 09

Dated 12/01/2023

  
(Haroon Rashid Khan) T.ST/PSP  
District Police Officer, Mardan.

Copy forwarded for information & n/action to:-

- 1) The SP/Investigation Mardan with reference to his office letter No.3276-78/GB/Inv: dated 09-11-2022.
- 2) The DSP/HQrs Mardan.
- 3) The P.O & E.C (DPO Office) Mardan.
- 4) The In-charge Lab (HRMIS) DPO Office Mardan.
- 5) The OSI (DPO Office) Mardan with ( ) Sheets.

  
**DSP Legal  
Mardan**



D

(46)

**ORDER.**

This order will dispose off the departmental appeal preferred by Ex-Constable Abid Ali No. 1743 of Mardan District Police against the order of the then District Police Officer, Mardan, whereby he was awarded major punishment of dismissal from service vide OB: No. 89 dated 12.01.2023. The appellant was proceeded against departmentally on the allegations that he while posted at Police Station Katlang, Mardan was placed under suspension on account of his involvement in case vide FIR No. 424 dated 06.11.2022 U/S 302/324/147/148/149-PPC Police Station Baizai District Mardan.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and Sub Divisional Police Officer (SDPO) Sheikh Maltoon, Mardan was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities, submitted her findings wherein she reported that the delinquent Officer was found guilty and was contacted time and again to appear before the enquiry Officer but he did not bother to do so, besides, he is also avoiding his lawful arrest, which showed that he was no more interested in Police Service. She recommended the appellant for ex-parte action.

He was issued Final Show Cause Notice on 04.02.2021, but neither did he submit his reply nor did he joined the investigation rather remained absconder. Hence, he was awarded major punishment of dismissal from service with effect from 06.11.2022.

Feeling aggrieved from the order of the then District Police Officer, Mardan, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 22.03.2023.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt. Moreover, the involvement of appellant in this heinous criminal case is clearly a stigma on his conduct. Hence, the retention of appellant in Police Department will stigmatize the prestige of entire Police Force as instead of fighting crime, he has himself indulged in criminal activities. He could not present any cogent justification to warrant interference in the order passed by the competent authority.

Keeping in view the above, I, Muhammad Ali Khan, PSP, Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal, therefore, the same is rejected and filed, being devoid of merit.

**Order Announced.**


  
Regional Police Officer,  
Mardan.

No. 1982 /ES, Dated Mardan the 30/03 /2023.

Copy forwarded to District Police Officer, Mardan for information and necessary w/r to his office Memo: No. 63/LB dated 28.02.2023. His service record is returned herewith.

(\*\*\*\*)

**ATTESTED**

  
Mardan

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR.**

**Service Appeal No. 2422/2023**

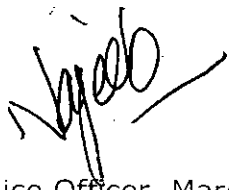
Abid Ali Ex-Constable No. 1743 s/o Umara Khan r/o Mian Khan Mohallah Khoshal  
Khel Baizai Tehsil Katlang District Mardan.....Appellant

**VERSUS**

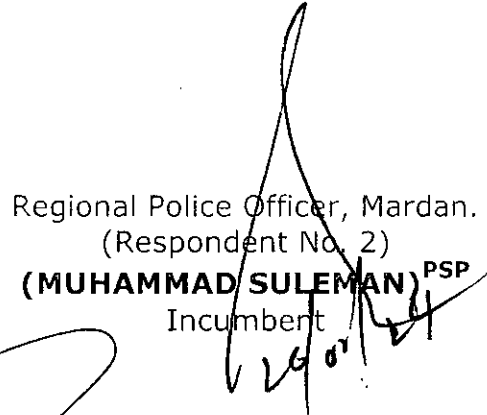
The Inspector General of Police, Khyber Pakhtunkhwa, Peshawar and others  
.....Respondents

**AUTHORITY LETTER.**

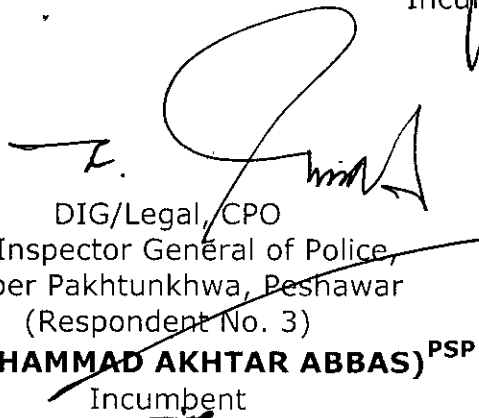
Mr. Wisal Ahmad Superintendent of Police Headquarters Mardan is hereby authorized to appear before the Honorable Service Tribunal, Khyber Pakhtunkhwa, Peshawar in the above captioned service appeal on behalf of the respondents. He is also authorized to submit all required documents and replies etc. as representative of the respondents through the Addl: Advocate General/Govt. Pleader, Khyber Pakhtunkhwa Service Tribunal, Peshawar.



District Police Officer, Mardan.  
(Respondent No. 1)  
**(NAJEEB-UR-REHMAN BUGVI)<sup>PSP</sup>**  
Incumbent



Regional Police Officer, Mardan.  
(Respondent No. 2)  
**(MUHAMMAD SULEMAN)<sup>PSP</sup>**  
Incumbent



DIG/Legal, CPO  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 3)  
**(DR. MUHAMMAD AKHTAR ABBAS)<sup>PSP</sup>**  
Incumbent