

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 652/2024

Yousaf Shah Ex-Constable No.530 District Charsadda.

.....Appellant

V E R S U S

The Provincial Police Officer, KPK & others

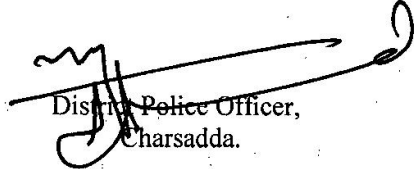
.....Respondents

I N D E X

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RESPONDENTS

Through


District Police Officer,
Charsadda.

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

Service Appeal No. 652/2024

Yousaf Shah Ex-Constable No.530 District Charsadda.....Appellant

V E R S U S

The Provincial Police Officer, KPK & others.....Respondents

REPLY BY RESPONDENTS NO.1 to 3

Respectfully Sheweth:

PRELIMINARY OBJECTIONS

1. That the appellant has got no cause of action.
2. That the appeal is badly barred by law and limitation.
3. That the appellant has been estopped by his own conduct to file the instant appeal.
4. That the appeal is not maintainable in its present form.
5. That the appellant has not come to the Honourable Tribunal with clean hands.
6. That the appeal is bad for mis-joinder and non-joinder of necessary parties.

ON FACTS

1. Correct to the extent that the appellant was appointed as Constable under Constabulary No.530 in the year 2009. Whereas, rest of the para is incorrect as service record of the appellant is tainted with multiple bad entries i.e major/minor penalties. (Copies of orders are **Annexure-A**)
2. Denied as incorrect and misleading. In fact, the appellant deliberately remained absent without obtaining any prior permission or leave from his senior officers. Moreover, neither did he appear before the enquiry officer nor produce any medical document, supporting his illness, at any stage of departmental proceedings initiated against him in the wake of his willful absence.
3. Incorrect and misleading. In fact, the appellant while posted at Police Lines, Charsadda got absent from his lawful duty, report of which was entered vide DD No.22 dated 04.03.2022 (Copy of daily diary is attached as **Annexure-B**). Subsequently, departmental proceedings were initiated against him and Charge Sheet along-with Statement of Allegations were issued to him (Copy of Charge Sheet & Statement of allegations is attached as **Annexure-C**). However, he did not join enquiry proceedings. He was also contacted on his cell no. 0311 9007299 through Police Lines, Charsadda regarding appearance before the enquiry officer on 28.04.2022. In this regard, report was entered vide DD No.13 dated 27.04.2022 of Police Lines Charsadda (copy of daily diary is attached as **Annexure-D**). Pertinent to mention here is that the appellant

reported his arrival on 28.04.2022 at Police Lines Charsadda vide DD No.36 dated 28.04.2022. However, he did not appear before the enquiry officer rather absented the next day i.e. on 29.04.2022 reported vide DD No.02 dated 29.04.2022(copy of daily diary is attached as **Annexure-E**). Therefore, an ex-parte action was recommended against him (copy of enquiry report is attached as **Annexure-F**). Final Show Cause was issued to him by the competent authority to which his reply was found not satisfactory (copy attached as **Annexure-G**). He was also provided opportunity of personal hearing by summoning him to appear in the orderly room but despite that he did not show up. Consequently, he was dismissed from service as per law by District Police Officer vide order dated 13/10/2022 (Copy of dismissal order is attached as **Annexure-H**).

4. Incorrect. The appellant, after dismissal from service on 13/10/2022 in the wake of duly departmental proceedings, moved an application to the appellate authority on 30/11/2022 which was time barred as per rules. However, he was summoned by the appellate authority in orderly room held on 21.12.2022 and was provided opportunity of personal hearing therein. However, the appellate authority being unsatisfied with the assertion made by the appellant rejected the appeal as per law being devoid of merit vide order dated 23.12.2022 (Copy of departmental appeal and RPO order dated 23.12.2022 are attached as **Annexure-I**). Moreover, the appellant filed revision petition. Thus, proceeding with it, a meeting of the Appellate Board was held on 01.03.2024 wherein appellant was heard in person and after perusal of enquiry papers, the revision petition was rejected as per law vide order dated 22.03.2024. **Copy of application to IGP/KPK and order dated 22.03.2024 is annexure J.**
5. That the appellant has been proceeded departmentally in accordance with law and thus, the instant appeal, being devoid of merits, is liable to be dismissed on the following grounds: -

GROUND

- A. Incorrect. All the orders passed by the respondents are in accordance with law and rules as all the codal formalities during departmental proceedings were fulfilled.
- B. Incorrect. Thorough enquiry proceedings were carried out in connection with the appellant's absence from his lawful duties as Charge Sheet along-with Summary of Allegations were issued to him. However, he did not bother to respond and eventually the Enquiry Officer recommended the delinquent official for major punishment of dismissal from service. Thus, Final Show Cause was issued to which he replied however, same was found not satisfactory. The appellant deliberately remained absent from his lawful duties and hence, dismissed from service as per law.
- C. Incorrect as already explained vide the above paras-3 of the facts.
- D. Incorrect. The appellant deliberately remained absent from his official duties which reflects his indifference towards official duty. Moreover, the appellant failed to produce any medical document supporting his illness at any stage of departmental proceedings. In addition to this, perusal of his service record would reveal his indiscipline attitude

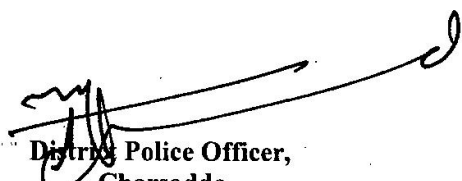
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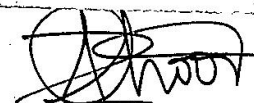
towards official duties as evident from his punishment record already attached as Annexure-A.

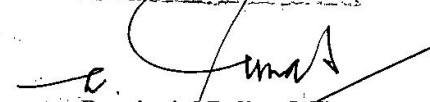
- E. Incorrect. The appellant was awarded punishment of dismissal from service for his long absence from official duties and his plea for redressal is totally invalid and bereft of any substance.
- F. Incorrect. Appellant was treated in accordance with law and all codal formalities were adopted during enquiry proceedings.
- G. That the respondents may also be allowed to adduce additional grounds at the time of hearing before this Hon'ble Tribunal.

PRAYER:

Keeping in view the facts above, it is therefore humbly prayed that the appeal of appellant, being without merit and substance, may kindly be dismissed with cost, please.


District Police Officer,
Charsadda
(Respondent No.3)
(MASOOD AHMAD)PSP
Incumbent


Regional Police Officer,
Mardan.
(Respondent No.2)
(ZAHOOR BABER)PSP
Incumbent


Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar
(Respondent No.1)
(DR. MUHAMMAD AKHTAR ABBAS) PSP
Incumbent

BETTER COPY

ORDER

This Office Order so far it relates to the disposal of Departmental Enquiry against Constable Yousaf Shah No.146 of FRP/HQrs Peshawar absented himself from duty w.e.from 12.06.2014 to 12.08.2014 and from 15.08.2014 till date without seeking any leave permission of the competent authority.

In this regard formal departmental proceeding were initiated against him and DSP Admin FRP/HQrs Peshawar was nominated as enquiry officer. He conducted enquiry into the matter and submitted his report.

Upon the findings of Enquiry Officer he was issued final Show Cause Notice which he received. His reply was not received in the prescribed period. Accordingly he was summoned to appear before the undersigned in orderly room but failed to do so.

Keeping in view of the recommendations of the enquiry office and other material available on record it has come crystal clear that the delinquent Official is a habitual absentee and does not interest in official duty. His service record also shows that previously he has reportedly absented from official duties for prolong periods in his short span of service. It is evident that he is not fit for Police service which requires discipline, coupled with performance of official duty especially in the prevailing law & order milieu. Therefore, Constable Yousaf No.146 of FRP HQrs is dismissed from service under Police Rules 1975 from the date of his absentee i.e 15.08.2014 and the period of absence is treated as leave without pay.

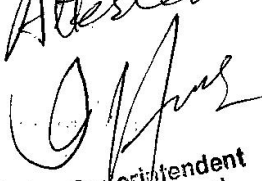
Order announced.

Deputy Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar

No. 1396-/PA/FRP/HQrs dated Peshawar the 29.12.2014.

Copies of the above is forwarded for information & n/action to:

1. The Commandant FRP/HQrs Peshawar.
2. The Accountant FRP/HQrs Peshawar.
3. The PA/FPR/HQrs Peshawar.
4. The SRC/FRP/HQrs Peshawar.
5. The FMC/FPR/HQrs Peshawar.....

Attested

Dy. Superintendent
of Police, Legal
Charsadda

(4)

Amendure - A

ORDER


This Office Order so far it relates to the Disposal of Departmental Enquiry against Constable Yousaf No. 146 of FRP/IQrs: Peshawar, absent himself from duty w.e. from 12.06.2014 to 12.08.2014 and from 15.09.2014 till the date without taking any leave/permission of the Competent Authority.

In this regard formal departmental proceedings were initiated against him and DSP//Admn: FRP/IQrs: Peshawar was nominated as Enquiry Officer. He conducted enquiry into the matter and submitted his report.

Upon the findings of Enquiry Officer he was issued Final Show Cause Notice to which he received His reply was not received in the prescribed period. Accordingly he was summoned to appear before the undersigned in Orderly Room but failed to do so.


Keeping in view the recommendations of the Enquiry Officer and other material available on record it has come crystal clear that the said Constable Official is a habitual absentee and does not take any official duty. His service record also shows that previously he has repeatedly absented from official duties for prolonged periods in his short span of service. It is evident that he is not fit for Police service, which requires discipline, honesty and efficient performance of official duty especially in the prevailing Law & Order situation. Therefore, Constable Yousaf No. 146 of FRP/IQrs is despatched from service under Police Rules, 1975 from the date of first absence i.e. 12.08.2014 and the period of absence is treated as leave without Pay.

Order announced.


Deputy Commandant
Frontier Force
Khyber Pakhtunkhwa Peshawar
29/12/2014

No. 2376 of PA/FRP/IQrs: dated Peshawar, the
Copy of the above is forwarded for information & action to:-

1. The Commandant, FRP Khyber Pakhtunkhwa.
2. The Deputy Commandant /FRP/IQrs: Peshawar.
3. The I/O/FRP/IQrs: Peshawar.
4. The C.O./FRP/IQrs: Peshawar.
5. The U.O./FRP/IQrs: Peshawar.
6. The FMC/FRP/IQrs: Peshawar with original enclosure file.


Attested
By: Superintendent
of Police Local

BETTER COPY

Three (3) days absence from duty.

Vide O.B No.343 dt 24-4-14

Order

Discharge from Service under the Police

Rules 1975 by Dy Commandant FRP/KPK

Vide memo No.1396-01/PA FRP/HQ

Dt 29-12-2014.

13 day absent from duty vide from

This office O.B No.515 dated 23.06.06.

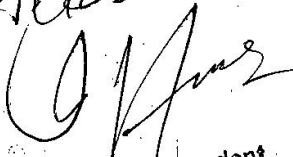
ORDER

Charge : Absence from duty 43 days 25/5/2017 to 8/7/2017

Punishment: total 43 day absence in which 30 day

Treated as E/leave and remaining 13 day treated as L/W/O

Pay vide order No.333-35/PA, dt 11/8/2017

Attested

Dy: Superintendent
of Police, Legal
Charsadda

5

(Continued)

15. CENSURES AND PUNISHMENT

15 days absence from duty
vide OB No. 372 dt 24-4-14

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Order

Discharge from Service under the Police
Rules 1975 by Dy Commandant FRP/KRP
vide this office memo nos 1396-01/FRP/KRP
dt 29-12-2014.

[Signature]
COMMANDANT
Frontier Reserve Pol
Khber Pakhtoon K
Peshawar.

arded
al in f
also

15 day absent from duty vide from
this office OB No. 515 date 23.6.06

[Signature]
Dy Superintendent
of Police, Logar
Charsadda.

[Signature]
COMMANDANT
Frontier Reserve Pol
Khber Pakhtoon K
Peshawar.

Charge - Absence from duty (13) days 25/5/2017 to 2/7/2017;
Punishment - Total (13) days absence in which (30) days
treated as P/leave and remaining (13) days treated as
pay vide order no 333-35/PF, dt 11/5/2017

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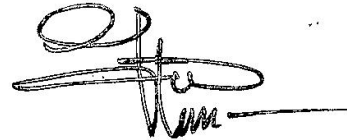
(6)

ORDER

This office Order relates to the disposal of formal departmental Inquiry against **Constable Yousaf No.3256**, while posted at FRP Peshawar Range, Peshawar absented himself from lawful duty w.e.from 25.05.2017 to 08.07.2017 for the total period of (43) days without taking any leave/permission of Competent Authority.

In this connection **Constable Yousaf No.3256**, was charge sheeted vide this office order No.225/PA, dated 15.06.2017 and also proceeded against him departmentally through **SI/Iltaf Hussain FRP/PR**. Who after fulfilling necessary process submit his findings wherein the I.O mentioned that the said constable submitted reply of charge sheet. But I was not agree with him. The I.O recommended his total absence period as leave without pay and along with five days extra drill.

Keeping in view all of the above the undersigned take a lenient view on humanitarian grounds that **therefore, his total (43) days absence period in which (30) days period is reckoned as earned leave and (13) days period is treated as leave without pay along with stern warning to careful in future. His pay is hereby released.**




Superintendent of Police, FRP
Peshawar Range, Peshawar.

No. 333-35 /PA dated Peshawar Range the 11 / 08 /2017.

Copy to:-

1. The Accountant FRP/PR Peshawar
- ✓2. The SRC/FRP/PR Peshawar
4. The OASI/FRP/PR Peshawar

Attested



Dy. Superintendent
of Police, Legal
Charsadda


⑦

ORDER

This office Order relates to the disposal of formal departmental Inquiry against Constable Yousaf Shah No.3256, while posted at FRP Peshawar Range, Peshawar absented himself from lawful duty w.e.from 01.08.2017 to 31.08.2017 and 06.09.2017 to 21.09.2017 for the total period of (44) days without taking any leave/permission of Competent Authority.

In this connection Constable Yousaf Shah No.3256, was charge sheeted vide his office order No.373/PA, dated 08.09.2017 and also proceeded against him departmentally through RI/Mushtaq Shah FRP/PR. Who after fulfilling necessary process submitted his findings wherein the I.O mentioned that the said constable submitted reply of charge sheet but I was not agree with him. The I.O further recommended his total absence period may be treated as leave without pay with befitting order.

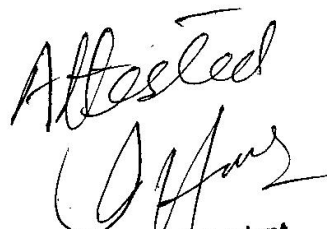
Afterword he appeared before the undersigned in orderly room and stated that his mother is suffering from paralysis disease. The undersigned take a lenient view that therefore, his total (44) days absence period in which (14) days treated as leave without pay, remaining (30) days treated as earned leave on humanitarian grounds and awarded (10) days extra drill along with stern warning to be careful in future. His pay is hereby released.


Superintendent of Police, FRP
Peshawar Range, Peshawar

No. 418-2c /PA dated Peshawar Range the 26 / 10 / 2017.

Copy to:-

1. The Accountant FRP/PR Peshawar
2. The SRC/FRP/PR Peshawar
3. The OASI/FRP/PR Peshawar


Dy: Superintendent
of Police, Legal
Charsadda

(8)

ORDER

This office Order relates to the disposal of formal departmental Enquiry against Constable Yousaf Shah No.3256, while posted at FRP Peshawar Range, Peshawar absented himself from lawful duty w.e.from 08.10.2018 to 12.11.2018 & 13.11.2018 to 27.11.2018 for the total period of (47) days without taking any leave/permission of Competent Authority.

In this connection Constable Yousaf Shah No.3256, was charge sheeted vide this office order No.508/PA, dated 19.10.2018 and also proceed him against departmentally through RI/Iltaf Hussain of FRP/PR. Who after fulfilling necessary process submitted his findings wherein the E.O mentioned that the said constable didn't submit reply in defence. He is habitual absentee as well as his previous record is also not good. The E.O recommended that ex-parte action may kindly be taken against him. Later on the said constable was served with Final Show Cause Notice, he submitted reply wherein he mentioned that due to his mother ailment he remained absent from lawful duty. He requested that his absence period may be treated as leave and the enquiry may kindly be filed.

Keeping in view all of the above the undersigned came to the conclusion that the total (47) days absence period of constable Yousaf Shah No.3256 is treated as without pay along with stern warning to be careful in future. His pay is hereby released.

Superintendent of Police, FRP
Peshawar Range, Peshawar.

No. 586-38 /PA dated Peshawar Range the 19 / 02 / 2018.

Copy to:-

1. The Accountant FRP/PR Peshawar
- ✓ 2. The SRC/FRP/PR Peshawar
3. The OASI/FRP/PR Peshawar

Attested
[Signature]
By: Superintendent
of Police,
Charadada

9

ORDER

This office Order relates to the disposal of formal departmental Inquiry against Constable Yousaf Shah No.3256, while posted at FRP Peshawar Range, Peshawar absented himself from lawful duty w.e.from 08.03.2018 to 12.04.2018 for the total period of (34) days without taking any leave/permission of Competent Authority.

In this connection Constable Yousaf Shah No.3256, was charge sheeted vide this office order No.146/PA, dated 21.03.2018 and also proceed him against departmentally through LO/Mushtaq Shah of FRP/PR. Who after fulfilling necessary process submitted his finding wherein the I.O mentioned that the said constable is habitually absentee and produced reason in reply of charge sheet but I am not agree with him. Therefore the I.O recommended that his total (34) days absence period may be treated as leave without pay with suitable punishment.

Keeping in view all of the above the undersigned came to the conclusion that therefore, his (34) days absence period is treated as leave without pay along with stoppage of one annual advance increment without accumulative effect and stern warning to be careful in future. His pay is hereby released.

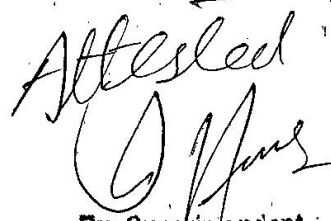


Superintendent of Police, FRP
Peshawar Range, Peshawar.

No. 247-49/PA dated Peshawar Range the 23/05/2018.

Copy to:-

1. The Accountant FRP/PR Peshawar
2. The SRC/FRP/PR Peshawar
3. The OASI/FRP/PR Peshawar



Dy. Superintendent
of Police, Legal
Charsadda


10

ORDER

This office Order relates to the disposal of formal departmental Inquiry against Constable Yousaf Shah No.3256, while posted at FRP Peshawar Range, Peshawar absented himself from lawful duty w.e.from 17.04.2018 to 01.05.2018 and 08.05.2018 to 24.05.2018 for the total period of (30) days without taking any leave/permission of Competent Authority.

In this connection Constable Yousaf Shah No.3256, was charge sheeted vide this office order No.264/PA, dated 01.06.2018 and also proceeded against him departmentally through LO/Mushtaq Shah of FRP/PR. Who after fulfilling necessary process submitted his findings wherein the I.O mentioned that the said constable stated in his written statement that his mother was ill which caused him absented from lawful duty but he is not agreed with him. The I.O declared that he is habitual absentee, therefore his total absence period of (30) days may be treated as leave without pay along with other suitable punishment.

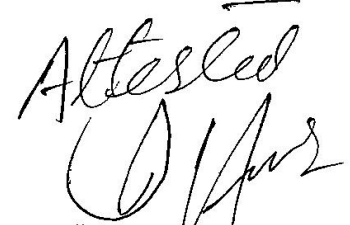
Keeping in view all of the above the undersigned take a lenient view due to his mother illness that therefore his (30) days absence period in which (23) days is treated as earned leave and remaining (07) days treated as leave without pay along with stern warning to be careful in future. His pay is hereby released.


Superintendent of Police, FRP
Peshawar Range, Peshawar.

No. 353-55/PA dated Peshawar Range the 09 / 08 / 2018.

Copy to:-

1. The Accountant FRP/PR Peshawar
2. The SRC/FRP/PR Peshawar
3. The OASI/FRP/PR Peshawar


Dy. Superintendent
of Police, Legal
Charsadda


(11)

ORDER

This office Order relates to the disposal of formal departmental Enquiry against Constable Yousaf Shah No.3216, while posted at FRP Peshawar Range, Peshawar absented himself from lawful duty w.e.from 20.07.2018 to 03.08.2018 and 17.08.2018 to 08.09.2018 for the total period of (35) days without taking any leave/permission of Competent Authority.

In this connection Constable Yousaf Shah No.3216, was charge sheeted vide this office order No.424/PA, dated 13.09.2018 and also proceed him against departmentally through RI/Rauf Khan of FRP/Mardan. Who after fulfilling necessary process submitted his findings wherein the E.O mentioned that the said constable received his charge sheet wherein he stated that his mother illness has caused him absented from duty but he didn't submit any medical reports, he also stated that his elder brother marriage arranged on 07.10.2018 also became a reason of his absence. The E.O mentioned that he is habitual absentee but keeping in view his poverty and being a sole earner for his whole family, it is recommended that a suitable punishment may be given to him to make him realize his poor status and responsibilities of duty.

Keeping in view all of the above the undersigned came to the conclusion that therefore, his total absence period of (35) days is treated as leave without pay along with stern warning to be careful in future. His pay is hereby released.


Superintendent of Police, FRP
Peshawar Range, Peshawar. 8

No. 491-93 /PA dated Peshawar Range the 09.10 /2018.

Copy to:-

1. The Accountant FRP/PR Peshawar
2. The SRC/FRP/PR Peshawar
3. The OASI/FRP/PR Peshawar


By Superintendent
of Police, Legal
Charsadda

ORDER

This office Order relates to the disposal of formal departmental Enquiry against Constable Yousaf Shah No.3256, while posted at FRP Peshawar Range, Peshawar absented himself from lawful duty w.e.from 11.12.2018 to 31.12.2018, 02.01.2019 to 13.02.2019 and 15.02.2019 to 06.04.2019 for the total period of (110) days without taking any leave/permission of Competent Authority

In this regard proper departmental enquiry was initiated against him, he was issued charge sheet alongwith summary of allegations vide this office No.05/PA dated 15.01.2019 and RI/Mushtaq Shah of FRP Peshawar Range, was appointed as Enquiry Officer to conduct proper departmental enquiry against him. After completion of enquiry the Enquiry Officer submitted his findings, wherein he mentioned that the said constable personally received his charge sheet, and submits his reply is found unsatisfactory which all about lies. He is habitually absentee, while his previous service records were also found unsatisfactory. His this act has a bad effect on other police officials, and in future he is not expected for a good police officer. Therefore as an enquiry officer I recommend him for a harsh Punishment.

Later on he was served with a Final Show Cause Notice. He was heard in person in Orderly Room and contended that his sister is severe ill which caused him absented and he belongs to a poor family and sole bread earner for his whole family. The defaulter constable stated that this last opportunity given to me otherwise ex-parte action shall be taken against me.

Keeping in view all of the above and his poor family background the Undersigned take a lenient view therefore, he is awarded with the following punishments:

1. His total absence period of (110) days treated as leave Without Pay.
2. Stoppage of two advanced annual Increments without a cumulative effect.
3. Awarded for (10) days Extra Drill and two days Quarter Guard along with stern warning to be careful in future.

Attested
[Signature]

[Signature]
Superintendent of Police, FRP
Peshawar Range, Peshawar.

No. 173-76/PA, dated Peshawar the 24/04/2019.


- Copy to
1. Accountant/FRP/PR
 2. SRC/FRP/PR
 3. CASI/FRP/PR

ORDER

This order will disposed off the departmental enquiry against Constable Yousaf Shah No. 530, while transfer from PS Battagram to Police Lines Charsadda, he has absented himself from law ful duty w.e.from 06.12.2020 to 10.03.2021 (03 months 04 days) without any leave or prior permission from his senior officer. Absence report recorded vide D.D No. 16, dated 06.12.2020.

On the above allegation he was issued Charge, Sheet together with statement of allegations under Police Rules 1975. Mr. Sabir Gul DSP Sardheri was nominated for probing into the matter by conducting departmental inquiry against him and he after fulfillment of cogai formalities has submitted his findings.

After perusal of the enquiry papers and recommendation of the enquiry officer, he is hereby awaded minor punishment of stoppage of one annunal increment without cumulative effect and absence period of (03 months & 04 days) of Constable *Yousaf Shah no 530* is hereby treated as leave without pay and his pay is released with immediate effect.


ZAIBULLAH KHAN (PSP)
DISTRICT POLICE OFFICER
CHARSADDA


O.B No. 385

Date 5-4-2021

No: 184-85 /HC, dated Charsadda the 05/04 /2021

Copy for information and necessary action to the:-

- I. Pay officer/EC/FMC,OASI

Attested


Dy: Superintendent
of Police, Legal
Charsadda

*S. Rull
M/A
28/04/2021*

(14)

ORDER

This order will dispose of the departmental enquiry against Constable Yousaf No. 530, while posted at Police Lines Charsadda, absented himself from his lawful duty w.e from 25.03.2021 to 07.05.2021 (42-days) without any leave or prior permission from his senior officers. Absence report recorded vide D.D No. 11, dated 25.03.2021. On the above allegation he was issued Charge Sheet together with statement of allegations under Sub Section 3, Section 5 of Police Rules 1975. The Inquiry Officer Mr. Ayaz Mehmood Khan DSP Charsadda was nominated for probing into the matter by conducting departmental inquiry against him and he after fulfillment of codal formalities has submitted his findings.

Subsequently, Constable Yousaf No.530, has been issued Final Show Cause Notice U/S 5(3) Police Rules 1975 reply to which was received but found unsatisfactory.

After perusal of the enquiry papers and recommendation of the enquiry officer, Constable Yousaf No. 530 is hereby awarded the minor punishment of censure and strictly warned to remain careful in future and his absence period is also treated as without pay. His pay is also released with immediate effect.


ZAIB ULLAH KHAN (PSP)
DISTRICT POLICE OFFICER
CHARSADDA


O.B No 688

Date 14-7/2021

No. 320-23 /HC, dated Charsadda the 14/07/2021

CC.

Pay Officer/OASI
✓ EC/FMC

Attested

Dy. Superintendent
of Police, Legal
Charsadda

(15)

This order will dispose of the departmental enquiry against Constable Yousaf Shah No. 530, while posted at Police Lines Charsadda, absented himself from his lawful duty w.e from 08.11.2021 to 14.11.2021 (06-days) without any leave or prior permission from his senior officers. Absence report recorded vide D.D No. 21, dated 08.11.2021. On the above allegation he was issued Charge Sheet together with statement of allegations under Sub Section 3, Section 5 of Police Rules 1975. Mr. Sabz Ali Khan the then DSP Shabqadar was nominated as inquiry officer for probing into the matter by conducting departmental inquiry against him and he after fulfillment of codal formalities has submitted his findings.

Subsequently, Constable Yousaf Shah No. 530, was issued Final Show Cause Notice U/S 5(3) Police Rules 1975 reply to which was not received so far.

After perusal of the enquiry papers & recommendation of the enquiry officer, the official is hereby awarded the minor punishment of censure & strictly warned to remain careful in future and his absence period i.e 06 days is also treated as without pay.


DISTRICT POLICE OFFICER
CHARSADDA


O.B No 313

Date 12/3/2022

No. 404-08 /HC, dated Charsadda the 17/03 /2022

CC.

Pay Officer/OASI
✓ EC/FMC
I/C Lab


Attested
By: Superintendent
of Police, Legal
Charsadda

Annexure - B
کوئٹہ پولیس ایجنسی
نمبر 22 روناچ 03/04 (16)

گنہگار
نور محمد خان

شمس الدین علی خاں در وقت 18:00 بجے مورخہ 03/04/22 میں پورے طور پر
کریڈٹ فائل آرڈر ڈیوٹی دینے والے میں سے کینسل یوسف شاہ
عمر وجودی ایئر جی ایم اے کے لیے سباز ضروری حکم و احکامات
پر لاگو کرنے پر حاضری کی گئی۔ حنا علی
تسلطاً اصل

(41) دن

غیر حاضر

M.M-PL-CLP
03-04-22

نمبر 28 روناچ 04/22

عمر 36 حاضری شمس الدین علی خاں در وقت 07:00 بجے مورخہ 04/28/22 میں وقت کینسل
یوسف شاہ کے لیے غیر حاضر شدہ بحالہ در 22 روناچ 03/04/22 سے
آیا۔ دیکھا گیا کہ میں بدولت میں سے افڈن مالا کو خود میان
میں عدالت کی حاضری نہ لے کر حاضری وغیرہ
میں مناسب کارروائی افڈن پر لاگو کر کے حاضری میں اصل

حنا علی
تسلطاً اصل

M.M-PL-CLP
23-04-22

Attested
Dy. Superintendent
of Police, Legal
Charsadda



17

Annexure - C

OFFICE OF THE
DISTRICT POLICE OFFICER, CHARSADDA
PHONE# 091-9220400 FAX#091-9220401
EMAIL: charsaddadpo@yahoo.com

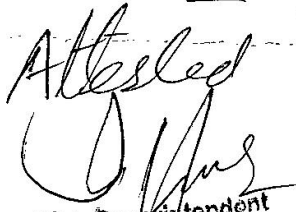
CHARGE SHEET UNDER KPK POLICE RULES 1975

I, **SOHAIL KHALID**, District Police Officer Charsadda, as competent authority hereby charge you **Constable Yousaf Shah No. 530**, as follows.

That you **Constable Yousaf Shah No. 530** while posted to Police Lines, Charsadda, on 04.03.2022 you absented yourself from lawful duty without obtaining prior leave from your senior officers evident vide Police Lines Charsadda DD No. 22 dated 04.03.2022 and till date failed to report back for your duty which portrays your inefficiency and lack of interest in the performance of your official duty. This amounts to grave misconduct on your part, warranting Departmental action against you as defined in section-6(I) (a) of the KPK Police Rules 1975

1. By reason of the above, you appear to be guilty of misconduct under section 02(III) of the KPK Police Rules 1975 and has render your self liable to all or any of the penalties as specified in section 04 (I) a & b of the said rules.
2. You are therefore, directed to submit your written defense within seven days of the receipt of this Charge Sheet to the Enquiry Officer.
3. Your written defense, if any should reach to the enquiry officer within the specified period, in case of failure, it shall be presumed that you have no defense to put-in and in that case an ex-parte action shall follow against you.
4. Intimate, whether you desired to be heard in person.


SOHAIL KHALID (PSP)
DISTRICT POLICE OFFICER
CHARSADDA


Dy. Superintendent
of Police, Legal
Charsadda



18



OFFICE OF THE
DISTRICT POLICE OFFICER, CHARSADDA
PHONE# 091-9220400 FAX#091-9220401
EMAIL: charsaddadpo@yahoo.com


DISCIPLINARY ACTION UNDER KPK POLICE RULES -1975

I, **SOHAIL KHALID**, District Police Officer Charsadda, as competent authority am of the opinion that **Constable Yousaf Shah No. 530**, has rendered himself liable to be proceeded against as he has committed the following acts/omissions within the meaning of section -02 (iii) of KPK Police Rules-1975.

STATEMENT OF ALLEGATIONS

That he **Constable Yousaf Shah No. 530** while posted to Police Lines, Charsadda, on 04.03.2022 he absented himself from his lawful duty without obtaining prior leave from his senior officers evident vide Police Lines Charsadda DD No. 22 dated 04.03.2022 and till date failed to report back for his duty which portrays his inefficiency and lack of interest in the performance of his official duty. This amounts to grave misconduct on his part, warranting Departmental action against him.


For the purpose scrutinizing the conduct of the said official, **Mr. Ihsan Shah, DSP City** is hereby deputed to conduct proper departmental enquiry against the aforesaid official, as contained in section-6 (I) (a) of the afore mentioned rules. The enquiry officer after completing all proceedings shall submit his verdict to this office within (10) days. **Constable Yousaf Shah No. 530** is directed to appear before the enquiry officer on the date, time and place fixed by the later (enquiry officer) a statement of charge sheet is attached herewith.


SOHAIL KHALID (PSP)
DISTRICT POLICE OFFICER
CHARSADDA

No. 11-12 /PA, dated Charsadda the 13/04 /2022

Copy of above to the: -

- 1) DSP/City
- 2) FC Yousaf Shah 530


Dy: Superintendent
of Police, Legal
Charsadda

Better Copy

پولیس لائن

تقلمد 13 روز نامچہ 27.04.022

ضلع چارسدہ

آمدہ اطلاع رپورٹ: شمشاد علی محروقت 1200 بجے مورخہ 27.04.022 اسوقت درج ہے کہ ریڈرٹو طارق 1 صاحب نے بذریعہ سرکاری فون اطلاع دی کہ کنشیل یوسف شاہ 530 کا کل مورخہ 28.04.022 بسلسلہ انکوائری طارق 1 صاحب کو پیشی ہے لہذا مذکورہ کو مطلع کریں چونکہ مذکورہ کنشیل بحوالہ مد 22 روز نامچہ 04.03.022 سے بدستور غیر حاضر ہے جس سے بذریعہ موبائل نمبر 03119007299 پر رابطہ کیا گیا مذکورہ کنشیل حاضری و پیشی سے انکاری ہے جس بابت رپورٹ درج روز نامچہ کر کے تقلمد بغرض مناسب کارروائی و اطلاعیاتی افسران بالا صاحبان کے خدمت میں ارسال کی جائیگی۔

جناب عالی!
نقل برطابق اصل ہے۔

Attested

Dy. Superintendent
of Police, Legal
Charsadda

نقلہ 13 روزانہ 27/04/22

Annexure-D

19

اکتافہ اطلاع

سٹیشنر علی شہزاد سے 12:00 بجے فوراً 27/04/22 کو اس وقت درج ذیل پر رپورٹ
 طاری آ رہی ہے کہ مذکورہ سرکاری فون اطلاع دی کہ کہ نیشنل جوہر سٹیشن
 کابل پورہ 28/04/22 کو ملزم انوار علی طاری آ رہی ہے کہ کہ نیشنل جوہر
 لکڑہ سڑک پر واقع (پلیٹ فارم) پر چوڑا سڑک پر نیشنل جوہر 22/04/22
 سے بدستور سڑک پر چل رہی ہے جس سے مذکورہ جوہر 22/04/22
 پر دربارہ کیا گیا ہے سڑک پر نیشنل جوہر کی قیام سے ادکاری کے نام
 بابت رپورٹ دینا اور مزاحمت کرنے کے لئے خط لکھ کر مذکورہ نامی و نامی کارروائی و اطلاع دینی
 افسران بالا مہمان کے ہدف سے ارسال کی جائیگی

مہمان علی
 ذیل مطالبات پر
 دیکھو
 PL - Cld
 27-04-22

Forwarded
 BSA
 PL - Cld
 27-04-22

Attested
 Dy: Superintendent
 of Police, Legal
 Charsadda

مذکورہ کے لئے 28-04-2022 کو 08:00 بجے کے بعد
 وقت کے مطابق کنگن - فارغ زر زر کے لئے ملزوم میں سے
 (مذکورہ) اور ان کے بعد زر زر کے لئے ملزوم میں سے
 اے بی اے - کے لئے ملزوم میں سے کنگن - کنگن کے لئے ملزوم میں سے

29-04-2022
 PL. 040
 29-04-2022

دستور کے مطابق ہے -

(62) دوم

ڈپٹی انسپکٹر جنرل

اور اے بی اے

کنگن کے لئے ملزوم میں سے

found stop
 - pan stop

Pay Stop
 Charge Sheet and Summary
 of Allegation.

O.B No. 672
 Date - 01-07-2022

Attested
 Dy. Superintendent
 of Police, Legal
 Charsadda

Dy. District Police Officer
 Charsadda

21

Ammedure - CF

NO. 250 /ST

DT: 28-04/2022

Subject: DEPARTMENTAL ENQUIRY REPORT AGAINST CONSTABLE YOUSAF SHAH NO.530 OF POLICE LINES CHARSAZZA.

REFERENCE ATTACHED

Allegation:

This is a proper departmental enquiry report against Constable Yousaf Shah No.530 with the allegations that he while posted at Police Lines Charsadda, on 04.03.2022 he absented himself from his lawful duty without obtaining prior leave from his senior officers evident vide Police Lines Charsadda DD No. 22 dated 04.03.2022 and till date he failed to report back for his duty which portrays his inefficiency and lack of interest in the performance of his official duty.

This amounts to grave misconduct on his part, warranting Departmental action against him.

Upon which charge sheet was served to him and summary of allegations by the W/DPO/Charsadda and the inquiry was marked to the undersigned vide No.11-12/HC, dated 13-04-2022 for the purpose to scrutinize the conduct of the said defaulter constable.

Proceedings:

The undersigned summoned constable through Police lines Charsadda staff but according to RI Police Lines the alleged official was contacted on his cell phone No. 0311-9007299 and he was directed to appear before IO but in vain. In this regard report was entered in DD NO. 13 dated 27.04.2022 (DD attached)

Conclusion:

The official facing enquiry is still absent from his duty and he also does not ready to appear before the undersigned. It is therefore recommended that Ex-Parte action may kindly be taken against Constable Yousaf Shah No, 530 if agreed please.

Worthy/DPO Charsadda

Dy: Superintendent of Police.
Charsadda

Attested
Dy: Superintendent
of Police, Legal
Charsadda

PA
/



Ammeive - 22 G

22

FINAL SHOW CAUSE NOTICE

Whereas, the charge of absence was referred to Enquiry Officer for General Police proceedings contained u/s 5 (3) Police Rules 1975.

AND

Whereas, the enquiry officer has submitted his findings, recommended for ex-parte action against you as you did not bother to appear before him.

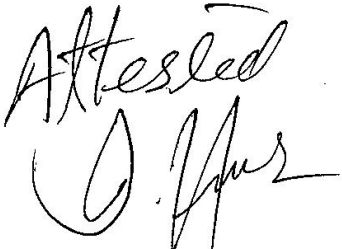
AND

Whereas, I am satisfied with the recommendation of the enquiry officer that you **Constable Yousaf Shah No. 530** while posted to Police Lines, Charsadda on 04.03.2022 absented yourself from lawful duty without obtaining prior leave or permission from your senior officers evident vide Police Lines Chd: DD No.22 dated 04.03.2022. You are still absent and yet to report back for your official duty which portrays your inefficiency and lack of interest in the performance of your official duties.

2. Thus the act amounts to gross misconduct and renders you liable for punishment, under Police Rules 1975.
3. Therefore, I, **SOHAIL KHALID**, District Police Officer, Charsadda in exercise of the powers vested in me under rules 5(3) (a) (b) of Police Rules 1975, call upon you to explain as to why the proposed punishment may not be awarded to you.
4. Your reply should reach the undersigned within 07-days of receipt of this notice, failing which disciplinary action pertaining to your dismissal from service will be taken ex-parte.
5. You are at liberty to appear in person before the undersigned for personal hearing.


**DISTRICT POLICE OFFICER,
CHARSADDA**

No. 257 /PA Dated 15/07/2022.


**Dy: Superintendent
of Police, Legal
Charsadda**

ضامی

حوالہ فائل شوکار لوٹس مہری PA - 257 مورخ 5-7-22

ارجحہ رہنما DPO صاحب طرہہ موصوفت ہوں

کے سائل کی والدہ صاحبہ بیمار تھی اور بعد بیماری والدہ صاحبہ فوت ہوئی جس سے سائل کو بیمار ہوا اور بیماری کی کاغذات چاہ کف جواب دیا ہے۔ بدیں و غیرہ مہری کی ہے۔ اس سائل اینڈ لوٹی اہل طریقہ اور ایسا نڈاری سے نکال دیا گیا۔ سائل کا فائل شوکار لوٹس بغیر کسی کاغذات فائل کرنے کا حکم صادر فرمائیں۔

Attested
[Signature]

Dy: Superintendent of Police

0344-9007299

Yousaf Shah

یوسف شاہ 530/PC حال لوٹس مہری طرہہ

R/Sir,

The official was informed through Police Line 24 & OAS1 branch for his appearance in OR, but he didnot, appeared. Moreover, the official is still absent.

Dismissing
[Signature]

Submitted for perusal & further orders

[Signature]
PA

Annexure - H

24


ORDER

This order will disposed off departmental inquiry against Constable Yousaf Shah No. 530, who while posted to Police Lines Charsadda remained absented from his lawful duty without obtaining prior leave or permission of his seniors w.e.from 20.02.2022 to 28.02.2022 (08-days) vide DD No. 30 dated 28.02.2022 and 04.03.2022 to 28.04.2022 (54-days) evident vide P.Lines Chd: DD No. 36 dated 28.04.2022. The delinquent Constable is constantly absent w.e.from 29.04.2022 vide P.Lines DD No. 02 dated even and yet to report back to duty place for his official duty. His act portrays inefficiency and lack of interest in the performance of his duties and also amount to gross misconduct on his part.

On the above allegation, he was issued charge sheet together with statement of allegations under sub section 3, Section 5 of Police Rules 1975 and Mr. Ihsan Shah, DSP City was appointed as Enquiry Officer who conducted proper inquiry into the matter. However, during course of inquiry, the delinquent Constable did not bothered to appear before the enquiry officer despite of numerous parwanas/calls therefore the enquiry officer submitted his findings and recommended an ex-parte action against the delinquent Constable.

The delinquent Constable was issued final show cause notice and summoned for personnel appearance but he didn't appear before the undersigned. The delinquent constable though submits his reply to the final show notice but deliberately avoiding his legitimate appearance in the Orderly Room. The conduct of the official is compelling the undersigned to disregard leniency and take a drastic action against him.

Therefore, after going through the enquiry papers and recommendation of the enquiry officer, ex-parte action is hereby taken and the delinquent Constable is hereby **dismissed from service** with immediate effect.


District Police Officer,
Charsadda


No. 427-33/PA, dated Charsadda the 13/10/2022

Copy for information to the:-

- 1) District Accounts Officer, Charsadda
- 2) DSP/City
- 3) DSP HQrs: Charsadda
- 4) Pay Officer/EC/FMC

O. B NO - 963

Dated - 11-10-2022


Dy: Superintendent
of Police, Legal
Charsadda

3724
05/12/22

25

Ammeri
Law
District Officer

کے متعلقہ تمام دستاویزات

District Officer
No. 7253
Date 2-12-22
Charsadda

EC/DPO Charsadda
For Comments

دائریہ دستاویزات

جو کہ ملازمین کے پاس ہیں اور اس کے تحت

بائین پورڈل ٹوٹا تھا۔ اور غیر حاضر ہے

تعمیرات کے بارے میں بھی بدوہران میں

تعمیرات کے بارے میں

جو کہ ملازمین نے 14 سال ملازمت کی ہے

پر ہے

Signature

RPO/Mardan
30/11/22
کے متعلقہ

No. 9497/EJ
dt. 05-12-22

ملازمت کے بارے میں

آئیے اس کے بارے میں ملازمت کے بارے میں

ملازمت کے بارے میں ملازمت کے بارے میں

ملازمت کے بارے میں ملازمت کے بارے میں

ملازمت کے بارے میں ملازمت کے بارے میں

ملازمت کے بارے میں ملازمت کے بارے میں

ملازمت کے بارے میں

Attestee
Signature

Dy: Superintendent
of Police, Legal
Charsadda

0311
9007299

9007299
EC

For signature

District Police

ملازمت کے بارے میں ملازمت کے بارے میں

ملازمت کے بارے میں ملازمت کے بارے میں

ORDER.

This order will dispose-off the departmental appeal preferred by Ex-Constable Yousaf Shah No. 530 of Charsadda District against the order of the District Police Officer, Charsadda, whereby he was awarded major punishment of dismissal from service vide OB: No. 963 dated 11.10.2022. The appellant was proceeded against departmentally on the allegations that he while posted at Police Lines Charsadda, remained absent from his lawful duty without obtaining prior leave or permission of his seniors with effect from 20.02.2022 to 28.02.2022 (08 days) vide daily diary No. 30 dated 28.02.2022 and 04.03.2022 to 28.04.2022 (54 days) evident vide Police Lines Charsadda daily diary No. 36 dated 28.04.2022. The delinquent Officer was constantly absent with effect from 29.04.2022 vide daily diary No. 02 and did not bother to report back to duty place.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and Mr. Ihsan Shah Sub Divisional Police Officer, (SDPO) City, Charsadda was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities submitted his findings wherein he reported that the delinquent Officer was contacted time and again to appear before the enquiry Officer, but he failed and remained absent, which showed that he was no more interested in Police Service. He recommended the delinquent Officer for ex-parte action.

The District Police Officer, Charsadda perused the findings and by agreeing with the recommendations of Enquiry Officer issued Final Show Cause Notice, but the delinquent Officer neither submitted his reply nor appeared for personal hearing. However, later on the delinquent Officer though submitted his reply to the Final Show Cause Notice but deliberately avoided his appearance in the Orderly Room.

Therefore, after going through the enquiry papers and recommendation of the enquiry officer, ex-parte action was taken and the delinquent Officer was awarded major punishment of dismissal from service by the District Police Officer, Charsadda vide OB: No. 963 dated 11.10.2022.

Feeling aggrieved from the order of the then District Police Officer, Charsadda, the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 21.12.2022.

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. As the appellant has bitterly failed to produce any cogent

Attested
[Signature]

By: Superintendent
of Police, Legal
Charsadda

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reason to justify his absence. Hence, the absence period i.e 07 months and 14 days of the appellant clearly depicts the casual and lethargic attitude towards his official duties as the very conduct of appellant is unbecoming of a disciplined Police Officer. Hence, order passed by the competent authority does not warrant any interference.

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. 10121 IES, Dated Mardan the 23/12 2022.

Copy forwarded to District Police Officer, Charsadda for information and necessary action w/r to his office Memo: No. 1359/EC dated 13.10.2022. His Service Record is returned herewith.

(*****)

Attested



Dy: Superintendent
of Police, Legal
Charsadda

محترم جنرل آف پولیس پشاور

جناب عالی! 11178/SK

موردانہ گزارش ہے کہ میں 2009 میں پولیس میں بطور
بھرتی ہوا تھا۔ 2022 میں چارجسٹری پولیس (رائٹرز) میں
تھا۔ اسی دوران بیماری کی وجہ سے میں عہدہ چھوڑ دیا۔
میں وجہ سے مجھے نوکری سے برخاست کیا گیا، میں ایک خرید
گھرانے سے تعلق رکھتا ہوں۔ دیگر میرے معاشی حالات بہت
کمزور ہیں۔

لہذا آپ صاحبان سے عاجزانہ گزارش ہے کہ مجھے نوکری
پر بحال کیا جائے میں ہمیشہ آپ کا دعا گو رہوں گا۔
سید فضل رپورٹ اور متعلقہ کاغذات لف پیس

الطارقی

Office of the PPO KPK, Peshawar
(Secret Branch)
By: No. S/101/23
Dated: 25/9/23

Yousaf Chohan
پولیس سٹیشن

Attested
530
119007299

Dy. Superintendent
of Police, Legal
Charsadda



29

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

District Police Officer
NO. 1370
Date 29.3.24
Charsadda

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by Ex-FC Yousaf Shah No. 530. The applicant was awarded major punishment of dismissal from service by DPO Charsadda, vide OB No. 963 dated 11.10.2022 on the allegations of that he was posted at Police Lines Charsadda, he absented himself from service on various occasion, his total absence i.e. 07 months & 14 days.

His revision petition was rejected by the Appellate Authority i.e. RPO Mardan vide order Findst: No. 10121/IS, dated 23.12.2022.

Meeting of Appellate Board was held on 01.03.2024 wherein petitioner was heard in person. The petitioner contended that the absence was not deliberate and that he was ill.

Perusal of enquiry papers revealed that the allegations leveled against the petitioner has been proved. The petitioner failed to submit any cogent reason in his self-defense. The Board sees no ground and reasons for acceptance of his petition, therefore, his petition is hereby rejected.

Sd/-
AWAL KHAN, PSP
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. S/ 651-656 /24, dated Peshawar, the 22-03- /2024.

Copy of the above is forwarded to the:

1. Regional Police Officer Mardan. Service Roll along-with Raji Missal of the above named Ex-FC received vide your office Memo: No. 1063/IS, dated 24.02.2023 is returned herewith for your office record.
- ✓ 2. District Police Officer, Charsadda.
3. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: E-IV CPO Peshawar.

RPO 007

NO-779
28-3-24

E.C/OAS/AsLegal
For up action

DPO Charsadda
28-03-2024

AWAL KHAN PSP, QPM
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Attested
[Signature]

Dy: Superintendent
of Police, Legal
Charsadda

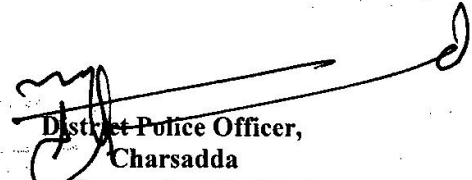


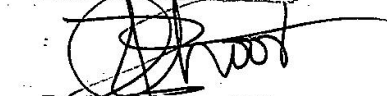
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GOVERNMENT OF KHYBER PAKHTUNKHWA
OFFICE OF THE DISTRICT POLICE OFFICER CHARSADDA
PHONE# 091/9220400 FAX# 091-9220401
EMAIL: charsaddadpo@yahoo.com

AUTHORITY IN SERVICE APPEAL No.652/2024 TITLED YOUSAF SHAH (EX-CONSTABLE) VS PPO/KPK & OTHERS.

Mr. Ijaz Hussain, Deputy Superintendent of Police, Legal Charsadda, is hereby authorized to appear before the Honorable Service Tribunal, Peshawar in the above captioned Service Appeal on behalf of answering respondents. He is also authorized to submit all required documents and replies etc as representative of the answering respondents through the Additional Advocate General, Khyber Pakhtunkhwa Peshawar.


District Police Officer,
Charsadda
(Respondent No.3)
(Masood Ahmad) PSP
Incumbent


Regional Police Officer,
Mardan.
(Respondent No.2)
(Zahoor Baber) PSP
Incumbent


Provincial Police Officer,
Khyber Pakhtunkhwa,
Peshawar
(Respondent No.1)
(DR. MUHAMMAD AKHTAR ABBAS) PSP
Incumbent

BEFORE THE HONOURABLE KPK SERVICES TRIBUNAL PESHAWAR

Service Appeal No. 652/2024

Yousaf Shah Ex-Constable No.530 District Charsadda.

.....Appellant

V E R S U S

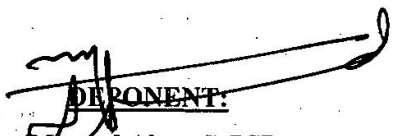
The Provincial Police Officer, KPK & others

.....Respondents

AFFIDAVIT

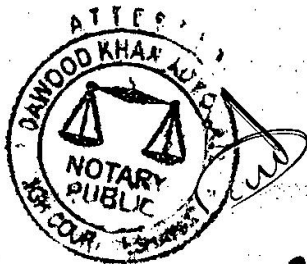
I, Masood Ahmed, District Police Officer, Charsadda, do hereby solemnly affirm and declare on Oath that contents of the parawise comments are true and nothing has been concealed from this Hon'ble Tribunal.

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.


DEPONENT:

(Masood Ahmed) PSP

District Police Officer,
Charsadda
(Respondent No.3)



13-06-2024