

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1417/2023.


**Ex-Constable Jehangir Khan, No. 1176 of FPR HQrs S/O Syed Sharafat Hussain
R/O Thangi Muhala chandani Chowk Tehsil Tangi District Charsadda
.....Appellant.**

VERSUS

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

INDEX

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE No.
1.	Para wise comment		03
2.	Previous Punishment	A & B	04-05
3.	Transfer order	C	06
4.	Charge Sheet	D	07
5.	Enquiry report	E	08-9
6.	Final Show Cause Notice	F	10
7.	Authority letter		11
8.	Affidavit		12
9.	total		12



RESPONDENTS

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**Service Appeal No. 1417/2023.****Ex-Constable Jehangir Khan, No. 1176 of FPR HQrs S/O Syed Sharafat Hussain
R/O Thangi Muhala Chandani Chowk Tehsil Tangi District Charsadda
.....Appellant.****VERSUS****Additional Inspector General of Police, Headquarter Khyber Pakhtunkhwa,
Peshawar & others.....Respondents.****PARAWISE REPLY BY RESPONDENTS 1 to 7.****RESPECTFULLY SHEWETH.****PRELIMINARY OBJECTIONS:-****Khyber Pakhtunkhwa
Service Tribunal****Diar. No. 12972****Dated 24/5/24**

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
3. That the appellant has no cause of action and locus stand to file the instant appeal.
4. That the appellant has not come to this Honorable Tribunal with clean hands.
5. That the appellant is estopped due to his own conduct to file the instant Service Appeal.
6. That the appellant is trying to conceal the material facts from this Honorable Tribunal.

FACTS:-

1. Correct to the extent that the appellant was appointed as constable in Police Department, while the rest of para is incorrect as the service record of the appellant reveals that he is habitual absentee and earlier he has remained absent from lawful duty on different occasions (for total period of 137 days), for which he was awarded several punishments including punishment of dismissal from service. Hence, there are 03 bad entries in his service roll with no good entry at all on his credit. (Copies of previous punishments attached herewith as annexure "A & B").
2. Incorrect. The appellant alongwith others were transferred outside region on compliant basis vide order Endst; No. 2238-43/PA, dated 08.12.2021, but he failed to report arrival at his new place of posting and remained absent from lawful duty w.e from 02.12.2021 till date of his removal from service without any leave or prior permission of the competent authority. (Copy of transfer order is attached herewith as annexure "C"). The plea of the illness of his father propounded by the appellant is a fabricated story.
3. Incorrect. The appellant still remained absent from lawful duty and he failed to inform his seniors with regard the illness of his father.
4. Incorrect. The appellant has not informed his seniors accordingly.
5. Incorrect. The appellant was well aware from his transfer order. However, he deliberately failed to report arrival at his new place of posting and remained absent from duty without any leave or prior permission of the competent authority.
6. Incorrect. In the wake of willful absence the appellant was proceeded against proper departmentally as he was issued Charge Sheet alongwith Summary of

Allegations and DSP Noor Zamin Shah of FRP HQrs; was nominated as Enquiry Officer to dig out the actual facts. After completion of enquiry, the Enquiry Officer submitted his finding, wherein the appellant was found guilty of the charges leveled against him and recommended for major punishment. (Copies of Charge Sheet, enquiry report are attached herewith as annexure "D & E"). Upon the finding of Enquiry Officer, the appellant was served with Final Show Cause Notice by the competent authority and his signature was obtained at the photo copy of the said notice as a token of receipt, but he failed to submit his reply. Besides, he was called for personal hearing, but he deliberately failed to appear before the competent authority. (Copy of Final Show Cause Notice is attached herewith as annexure "F"). After fulfillment of all codal formalities he was awarded major punishment of removal from service as per law/rules.

7. Departmental appeal submitted by the appellant was entertained and thoroughly examined, hence rejected on sound grounds.
8. The appellant has not come to this Honorable Tribunal with clean hands, hence this appeal being devoid of merits may kindly be dismissed on the following grounds.

GROUND:-

- A. Incorrect. The impugned orders passed by the respondents in the case of appellant are legally justified and in accordance with law/rules, hence liable to be maintained.
- B. Incorrect and denied. In fact the appellant was found an indisciplined and disobedient subordinate as he deliberately avoids the lawful order of the competent authority. As on transfer posting he is required to report his arrival at his new place of posting, but instead he remained absent from his lawful duty vide DD report No. 08, dated 08.12.2021 without any leave or prior permission of the competent authority. In this regard, he was proceeded against proper departmentally and the allegations of willful absence were fully established against him during the course of enquiry.
- C. Incorrect. On the allegations of willful absence the appellant was issued Charge Sheet with Summary of Allegations and Enquiry Officer was nominated to probe into the matter. The Charge Sheet was served upon him by the Enquiry Officer through special messenger on his home address and his signature was obtained on the photo copy of Charge Sheet as a token of receipt, but he failed to submit his reply or to appear before the Enquiry Officer.
- D. Incorrect. The allegations are false and baseless. The appellant has already been served with proper Charge Sheet and Show Cause Notice as evident from his signature obtained on the Photo copies of Charge Sheet/Show Cause Notice. Hence, the appellant was absolutely treated in accordance with law within the meaning of Article 4 of the constitution by giving him sufficient and proper opportunities at every level of defense and that the entire proceedings were carried out in accordance with existing laws and rules.
- E. Incorrect. As explained in the preceding para above proper departmental enquiry was initiated against the appellant, but he failed to submit his reply of Charge Sheet as well as Show Cause Notice and to explain his position. Besides, a sufficient opportunity for defense in the shape of personal hearing has also been offered to the appellant as he was called in Orderly Room on 25.01.2021, but he deliberately failed to avail this opportunity, by meaning thereby that he was no more interested in the service of police department.

Hence, after fulfillment of all codal formalities he was awarded major punishment of removal from service as per law/rules.

- F. Incorrect and denied. As the respondents have already adopted all legal procedure in the enquiry proceeding provided by Police Rules 1975 amended in 2014. Hence, the punishment awarded to the appellant is legally justified and in accordance to law/rules.
- G. Incorrect. As proper departmental enquiry has been conducted against the appellant and after fulfillment of all codal and legal formalities he was awarded major punishment of removal from service, which is tenable in the eye of law.
- H. Incorrect. In fact, the appellant being a member of disciplined force deliberately and willfully remained absent from his assigned duty without any prior permission of the competent authority, which is a gross misconduct on his part. Hence, the punishment of removal from service awarded to the appellant is commensurate with the gravity of his gross misconduct. However, his absence period was already treated as without pay, which is not fallen in the preview of punishment as per Police Rules 1975 amended in 2014.
- I. Incorrect. The appellant trying to mislead this Honorable Tribunal. In fact the appellant was absolutely treated in accordance with law within the meaning of Article 4 of the constitution of Islamic Republic of Pakistan.
- J. The respondents may also be permitted to raise additional grounds at the time of arguments.

PRAYERS:-

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



Deputy Superintendent of Police,
FRP HQrs; Peshawar
(Respondent No. 06)
Hameeda Bano
(Incumbent)



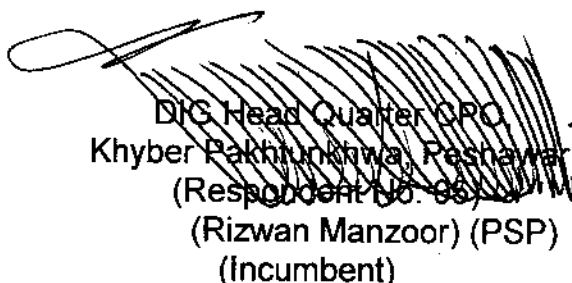
Superintendent of Police FRP,
DI Khan Range, DI Khan
(Respondent No. 07)
Azmat Khan
(Incumbent)



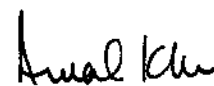
Deputy Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)
Asif Bahadar (PSP)
(Incumbent)



Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)
Muhammad Tahir Ayub (PSP)
(Incumbent)



DIG Head Quarter CPO,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 05)
(Rizwan Manzoor) (PSP)
(Incumbent)



Addl; IGP Head Quarter CPO,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 04)
Awal Khan (PSP)
(Incumbent)

ORDER.

This office order relates to the disposal of denove departmental proceeding against Ex-Constable Jehangir No. 825 of FRP Hqrs: Peshawar.

Brief facts of the case are that the Constable Jehangir No. 825 of FRP Hqrs. Peshawar, remained absent from duty w.e from 22.02.2011 to 25.02.2012 for a period (368) days. He was removed from service by the then Deputy Commandant, FRP vide this office order Endst: No. 528-32/PA dated 25.02.2012. The delinquent Constable preferred an appeal before the worthy Provincial Police Officer, Khyber Pakhtunkhwa. The Worthy Provincial Police Officer accepted his appeal and set aside the case on the grounds that proper departmental enquiry had not been conducted against him. Accordingly he was re-instated in service with the directions, to conduct denove departmental proceeding against him vide his Order Endst No. 1127/legal dated 05.2013.

In this regard he was Charge Sheeted and DSP/FRP, Mardan was nominated as enquiry officer to conduct enquiry into the matter and submit his finding. After completion of all codal formalities the enquiry officer submitted his findings wherein, he mentioned that during the course of enquiry as well as his written reply of Charge Sheet professed his innocence and took the plea of severe sickness during the absence period for which he submitted medical certificates which should not be refused as per Police Rule 1981. The medical certificates were subsequently marked to the concerned DHQ Hospital for verification which was found correct/genuine. It was also pointed out that the delinquent official failed to provide medical certificates well in time to the competent authority. He has committed misconduct therefore, the enquiry officer recommended him for re-instatement in service and awarded minor punishment of stoppage of (02) Annual increments without cumulative effect.

Keeping in view the above circumstances lenient view has been taken and he is re-instated in service and his absence period of (150) days is counted as Medical leave and also awarded the minor punishment of stoppage of (2) Annual increments without cumulative effects.

Order announced

Chapman
DEPUTY COMMANDANT
FRONTIER RESERVE POLICE
KHYBER PAKHTUNKHWA, PESHAWAR.

No. 597-99 PA dated Peshawar the 23 / 08 / 13.

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

1. RI/FRP/Hqrs: Peshawar.
2. Accountant/FRP.Hqrs: Peshawar
3. SRC /FRP Hqrs: Peshawar.

Attested
[Signature]

(5)

T T D P

n B n

ORDER.

Constable Jehangir No. 825 of FRP HQrs: Peshawar absented himself from duty with effect from 04.11.2018 till 13.12.2018 for a period of 36 days without any leave/permission of the competent authority. He was issued Charge sheet/statement of allegation and DSP FRP HQrs: Peshawar was appointed as Inquiry Officer. After Inquiry the IO, submitted his finding, wherein he recommended the above named Constable for ex-parte action. Keeping in view the recommendation of Enquiry Officer, he is awarded the following punishment:-

- i. Stoppage of One Annual Increment with cumulative effect.
 - ii. Absence period of 36 days treated as without pay.
- His pay release.

[Signature]
 Deputy Commandant
 Frontier Reserve Police
 Khyber Pakhtunkhwa Peshawar
 2019 *[Signature]*

No. 73-75

IPA dated Peshawar the 08-01-

2019

- Copy of above is sent for information & necessary action to the:-
- 1 Accountant FRP HQrs: Peshawar.
 - 2 SRC/CASI FRP HQrs: Peshawar

Attested
[Signature]
 21/1/20

[Signature]
 For Comdt. FRP
 Peshawar

relative
 S/PA
 -2019

PAE

FRP



OFFICE OF THE
DEPUTY COMMANDANT
FRONTIER RESERVE POLICE
KHYBER PAKHTUNKHWA, PESHAWAR
Email: comdtfrpofficial@gmail.com
Ph: No. 091-9210545 Fax No. 091-9214114

No. 2238-43/PA, dated 08/12/20

ORDER

The following officials of FRP HQrs do not take interest in their official c
Therefore, they are hereby transferred to outer FRP Ranges on complaint
noted against each their names with immediate effect.

S.NO	Name & No	From	To
✓1.	FC Amir No. 491	FRP HQrs	FRP Bannu Range
✓2.	FC Mujeeb No. 1476	FRP HQrs	FRP Bannu Range
✓3.	FC Ijaz No. 1205	FRP HQrs	FRP Bannu Range
✓4.	FC Anwar Zada No. 889	FRP HQrs	FRP Bannu Range
✓5.	FC Mati ur Rehman No. 324	FRP HQrs	FRP Bannu Range
✓6.	FC Syed Rehman No. 466	FRP HQrs	FRP Bannu Range
✓7.	FC Bacha Syed No. 94	FRP HQrs	FRP Bannu Range
✓8.	FC Kiramat No. 998	FRP HQrs	FRP Bannu Range
✓9.	FC Zahoor No. 2240	FRP HQrs	FRP Bannu Range
✓10.	FC Najib No. 271	FRP HQrs	FRP Bannu Range
✓11.	FC Asif No. 1119	FRP HQrs	FRP DIKhan Range
✓12.	FC M. Ali No. 1002	FRP HQrs	FRP DIKhan Range
✓13.	FC Shah Saood No. 50	FRP HQrs	FRP DIKhan Range
✓14.	FC Wali Ullah No. 1062	FRP HQrs	FRP DIKhan Range
✓15.	FC Zeeshan No. 2151	FRP HQrs	FRP DIKhan Range
✓16.	FC Qasim No. 1848	FRP HQrs	FRP DIKhan Range
✓17.	FC Wasayat No. 1797	FRP HQrs	FRP DIKhan Range
✓18.	FC Nawab Khan 1407	FRP HQrs	FRP DIKhan Range
✓19.	FC Jehangir No. 1176	FRP HQrs	FRP DIKhan Range
✓20.	FC Amjad No. 1359	FRP HQrs	FRP DIKhan Range
✓21.	FC Faheem No. 919	FRP HQrs	FRP DIKhan Range
✓22.	FC Rooh Ullah No. 784	FRP HQrs	FRP DIKhan Range

P/1033
08-12-20

Attended
Deputy Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa
Peshawar
20/5/20

Endst: No & Date Even:
Conv to the:-

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

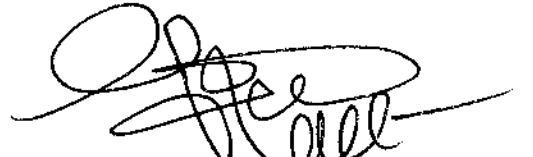
You the under mentioned Constables of FRP HQrs: Peshawar is hereby charged for committing the following omission/commissions. While they were posted at FRP HQrs: Peshawar absented himself from duty without taking any leave/permission of the competent authority.

1. Syed Rahim No. 466 absented from 08. 12.2021 till date.
2. Kiramat No. 998 absented from 30. 11.2021 till date.
3. Najeeb No. 271 absented from 10.12.2021 till date.
4. Zeeshan No. 2151 absented from 06. 12.2021 till date.
5. Jahangir No. 1176 absented from 08. 12.2021 till date.

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

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

Summary of allegations is enclosed here with.


Deputy Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar

Admitted
Sh. 998
24/12/21

27/12/21
Sh. Rahim

No. D. 313 8759788

Nic. 17301-6065854-9.

انکوائری رپورٹ

جناب عالی!


بجوالہ بشمولہ انکوائری کاغزات بنام کنسٹیبلان سید رحیم نمبر 466، کرامت نمبر 998، ذیشان نمبر 2151 اور جہانگیر نمبر 1176 معروض خدمت ہوں کہ مذکورہ بالا کنسٹیبلان بجوالہ آرڈر نمبری OASI/43-2238 مورخہ 08-12-2021 پر ایف آر پی ہیڈ کوارٹر سے ایف آر پی DIKhan, Bannu ریج آن کمپلینٹ تبدیل میں ہو چکے ہیں۔ جنمیں سے کنسٹیبل سید رحیم نمبر 466، کنسٹیبل جہانگیر نمبر 1176 بجوالہ مد 08 مورخہ 08-12-21، کنسٹیبل کرامت نمبر 998 بجوالہ مد 56 روزنامچہ 21-11-30 اور کنسٹیبل ذیشان نمبر 2151 بجوالہ مد 31 مورخہ 21-12-06 سے بدستور غیر حاضر ہیں اور مذکورین کو بار بار حاضری / روانگی کی متعلق اطلاع دی گئی۔ نقلد متذکرہ جناب ڈپٹی کمائنڈنٹ صاحب ایف آر پی کے پی نے مذکورین کے خلاف چارج شیٹ و سمری آف الیگیشن جاری کر کے کاغزات بغرض انکوائری من DSP-HQrs ایف آر پی پشاور کو حوالہ ہوئی۔

دوران انکوائری کنسٹیبلان سید رحیم نمبر 466 اور کرامت نمبر 998 پر مورخہ 27.12.2021 کو، جہانگیر نمبر 1176 پر مورخہ 29/12/21 کو اور کنسٹیبل ذیشان نمبر 2151 پر مورخہ 28-12-21 کو بذریعہ DFC ایف آر پی ہیڈ کوارٹر چارج شیٹ حسب ضابطہ تقسیم کی گئی ہے لیکن مذکورین نے تاحال کسی قسم کے تحریری جواب پیش نہیں کئے ہیں۔

محرر ایف آر پی ہیڈ کوارٹر سے زکورہ کنسٹیبلان کے بابت تحریری رپورٹ طلب کی گئی جس کے مطابق کنسٹیبلان سید رحیم نمبر 466، جہانگیر نمبر 1176 بجوالہ مد 08 روزنامچہ 21-12-11 از مورخہ 21-12-08 سے اور کرامت نمبر 998 بجوالہ مد 56 روزنامچہ 21-11-30 سے برطبق ریکارڈ روزنامچہ FRP/HQrs سے بدستور غیر حاضر ہیں جبکہ کنسٹیبل ذیشان نمبر 2151 نے مورخہ 21-12-23 پر حاضری کر کے بجوالہ OASI/43-2238 مورخہ 21-12-08 پر آن کمپلینٹ میں ایف آر پی DIKhan ریج تبدیل ہو چکا ہے۔ مذکورہ کو بجوالہ مد 24 روزنامچہ 21-12-23 پر ایف آر پی DIKhan ریج روانہ کیا گیا ہے۔ (رپورٹ ہمراہ لف ہے)

اندریں سلسلہ کنسٹیبل ذیشان نمبر 2151 جو کہ بجوالہ مد 24 روزنامچہ 21-12-23 ایف آر پی DIKhan ریج کو روانہ کیا گیا ہے کے بابت پتہ براری کرنے کے لئے امجد محار FRP/DIK ریج سے بذریعہ کنٹرول روم رابطہ کیا گیا جس نے بتلایا کہ مذکورہ کنسٹیبل نے اپنی حاضری کی رپورٹ تاحال نہیں کی ہے اور بدستور غیر حاضر ہے۔ (رپورٹ غیر حاضری ہمراہ لف ہے)

Attest



جناب عالی!

درج بالا حالات و ریکارڈ کو مد نظر رکھتے ہوئے اس نتیجہ پر پہنچا ہوں کہ کنسٹیبلان سید رحیم نمبر 466 اور کرامت نمبر 998، بجوالہ لیٹر آرڈر نمبری OASI/43-2238 مورخہ 21-12-2021 پر FRP/HQrs سے ایف آر

پی Bannu ریجن آن کپیڈنٹ میں پر تبدیل ہو چکے ہیں جبکہ کنسٹیبلان ذیشان نمبر 2151 اور جہانگیر نمبر 1176 بحوالہ لیٹر آرڈر نمبری OASI/43-2238 مورخہ 08-12-2021 پر FRP/HQrs سے ایف آر پی DIKhan ریجن تبدیل ہو چکے ہیں۔ مذکورین بالا کنسٹیبلان میں سے کنسٹیبل سید رحیم نمبر 466 ، کنسٹیبل جہانگیر نمبر 1176 بحوالہ مد 08 روزنامچہ 11.12.2021 از مورخہ 08-12-21 سے ، کنسٹیبل کرامت نمبر 998 بحوالہ مد 56 روزنامچہ 30-11-2021 سے روزنامچہ Frp/Hqrs پشاور میں تاحال بدستور غیر حاضر ہیں۔ جبکہ کنسٹیبل ذیشان نمبر 2151 نے ایف آر ہیڈ کوارٹر پشاور میں حاضری کر کے بحوالہ مد 24 روزنامچہ 23.12.21 پر ایف آر پی DIKhan ریجن روانہ کیا جا چکا ہے لیکن بمطابق محرر ایف آر پی DIKhan کنسٹیبل مذکورہ نے DIKhan ریجن میں تاحال حاضری نہیں کی ہے اور بدستور غیر حاضر ہیں۔

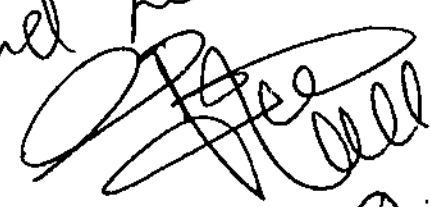
چونکہ کنسٹیبلان سید رحیم نمبر 466 اور کرامت نمبر 998 کو مورخہ 27.12.2021 پر ، جہانگیر نمبر 1176 پر مورخہ 29/12/21 کو اور کنسٹیبل ذیشان نمبر 2151 پر مورخہ 28-12-21 کو بذریعہ DFC ایف آر پی ہیڈ کوارٹر چارج شیٹ حسب ضابطہ تقسیم کی گئی ہے لیکن مذکورین نے تاحال کسی قسم کے تحریری جواب پیش نہیں کئے ہیں۔ مذکورین نے نہ ہی حاضری کی ہے اور اپنی ڈیوٹی سے بدستور غیر حاضر ہیں۔ پس یہ معلوم ہوتا ہے کنسٹیبلان مذکورین نوکری کرنے کے خواہاں نہیں ہیں۔ لہذا مذکورہ بالا 04 نفر کنسٹیبلان کو Major Punishment دینے کی سفارش کی جاتی ہے۔

رپورٹ گزارش ہے۔

DSP
ایف آر پی پشاور
No. 305
dl: 12/1/22

Attested



Issue final show
Cause notice to
above named
S. Rahim, Karamat,
and Jee Shan

12/1/22



OFFICE OF THE
DEPUTY COMMANDANT
FRONTIER RESERVE POLICE
KHYBER PAKHTUNKHWA, PESHAWAR

Email: comdtfrpofficial@gmail.com
Ph: No. 091-9210945 Fax No. 091-9214114

No. 82 /PA, Dt: 14 / 01 / 2022.

FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

I, Deputy Commandant FRP / K.P.K as Competent Authority do hereby serve you the following constables of FRP HQrs: Peshawar, transfer on complaint basis Bannu and DIKhan ranges, but they deliberately absented themselves from lawful duties. In this regard they were issued charge sheet and DSP FRP HQrs was appointed to conduct inquiry in to the matter.

Sno	Name & No.	FROM	To	Absence from
1	Syed Raheem 466	FRP HQrs:	FRP Bannu	From 8-12-2021 till to date
2	Kiramat No. 998	FRP HQrs:	FRP Bannu	From 30-11-2021 till to date
3	Jahangir No. 1176	FRP HQrs:	FRP DIKhan	From 8-12-2021 till to date ✓
4	Zeeshan No.2151	FRP HQrs:	FRP DIKhan	From 06-12-2021 till to date

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

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

(4) If no reply to this Show Cause Notice is received within (07) days of it delivery in the normal course of circumstances, it shall be presumed that you have no defense to put in and consequently ex-parte action shall be taken against you.

Attested

[Signature]

Jahangir
17-01-2022

[Signature]

Deputy Commandant
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar

محمد شہزاد 1176 ولد سید شرافت حسین سید جانڈی جوگ شہزی
ضلع جوار

17102-596649-1

0301-5946473

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1417/2023.

Ex-Constable Jehangir Khan, No. 1176 of FPR HQrs S/O Syed Sharafat Hussain R/O Thangi Muhala chandani Chowk Tehsil Tangi District Charsadda
.....Appellant.

VERSUS

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

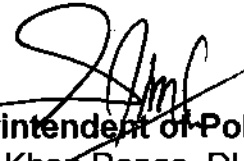
AUTHORITY LETTER

Respectfully Sheweth:-

We respondents No. 1 to 7 do hereby solemnly authorize Mr. Ghassan Ullah ASI FRP HQrs; to attend the Honorable Tribunal and submit affidavit/Para-wise comments required for the defense of above Service Appeal on our behalf.



Deputy Superintendent of Police,
FRP HQrs; Peshawar
(Respondent No. 06)
Hameeda Bano
(Incumbent)



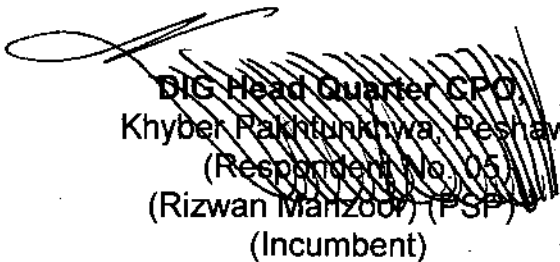
Superintendent of Police FRP,
DI Khan Range, DI Khan
(Respondent No. 07)
Azmat Khan
(Incumbent)



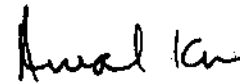
Deputy Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)
Asif Bahadar (PSP)
(Incumbent)



Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 01)
Muhammad Tahir Ayub (PSP)
(Incumbent)



DIG Head Quarter CPO,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 05)
(Rizwan Manzoor) (PSP)
(Incumbent)



Addl; IGP Head Quarter CPO,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 04)
Awal Khan (PSP)
(Incumbent)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1417/2023.

**Ex-Constable Jehangir Khan, No. 1176 of FPR HQrs S/O Syed Sharafat Hussain
R/O Thangi Muhala chandani Chowk Tehsil Tangi District Charsadda**
.....Appellant.

VERSUS

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

AFFIDAVIT

I respondent No. 06 do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments is correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court.

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

Deputy Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 2)
(Asif Bahadar) PSP
Incumbent

ATTESTED