

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1699/2022.

Muhammad Yasir Ex-Constable No. 5350, Platoon No. 117, FRP Kohat R/o Bannu Road, Village Tapi, Kohat.....Appellant.

VERSUS

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

INDEX

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE No.
1.	Para-wise Comments		04
2.	Copies of previous punishments	A-B	05-06
3.	Show Cause Notice	C	07
4.	DD report dated 19.07.2021.	D	08
5.	Charge Sheet	E	09
6.	Reply of Charge Sheet	F	10
7.	Enquiry report	G	11
8.	DD report dated 19.07.2021	H	12
9.	Authority Letter		13
10.	Affidavit		14
Total			14


RESPONDENTS

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1699/2022.

Muhammad Yasir Ex-Constable No. 5350, Platoon No. 117, FRP Kohat R/o Bannu Road, Village Tapi, Kohat.....Appellant.

VERSUS

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

PARAWISE REPLY BY RESPONDENTS 1 to 4.

RESPECTFULLY SHEWETH.

PRELIMINARY OBJECTIONS:-

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 13163

Dated 04-06-2024

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. Pertains to record of appellant's initial appointment as constable.
2. Denied as incorrect. In fact, the appellant is found a habitual absentee and inefficient Police Officer in the line of duty. Perusal of his service record reveals that during service he remained absent from duty on different occasions amounting to (long period of 214) days for which he was awarded various punishments including one time dismissal from service and in this regard there are 13 bad entries without a single entry on his credit. (Copies of previous punishments are attached as annexure "A & B").
3. Incorrect. As already explained vide preceding para.
4. Pertains to record.
5. Incorrect. As explained in the preceding para No. 2 that the appellant is found an inefficient and irresponsible official. Even, on transfer/posting to FRP he did not mend his ways and repeated the indiscipline practice of absence from his lawful duties without leave/permission.
6. Incorrect, as he repeated his habit of absence, at his new place of posting and on the basis of which, he was issued/served with Show Cause Notice. (Show Cause Notice attached herewith as "C").
7. Incorrect. The appellant while posted at District Police lines Kohat was selected for Election duty at Azad Kashmir, but he deliberately remained absent from his lawful duty with effect from 20.07.2021 to 23.08.2021, 25.08.2021 to 21.09.2021, 23.09.2021 to 04.10.2021, 17.10.2021 to 25.11.2021 and 01.05.2021 to 24.05.2021 (total period of 145 days) without any leave or prior permission of the competent authority.
8. Incorrect. The appellant alongwith others officials who had proceeded on leave were recalled for Election (special duty) of Azad Kashmir. The appellant also arrived for joining of such duty on 19.07.2021, but later on, he deliberately denied the said special duty vide DD report dated 19.07.2021. (Copy of DD report attached herewith as annexure "D"). It is worth to mention here that as per Police act 2017 a police officer can be called for duty even proceeding on leave.

- (2)
9. Incorrect. On the allegations of willful absence the appellant was proceeded departmentally as he was issued Charge Sheet alongwith Summary of Allegations and Inspector Dost Muhammad was appointed as Enquiry Officer to probe into the matter. (Copy of Charge Sheet attached as annexure "E")
 10. Incorrect. As the appellant was earlier served with Show Cause Notice, but he failed to submit his reply within stipulated period. Therefore, for proper departmental enquiry he was issued Charge Sheet alongwith Summary of Allegations and served upon him to which, his reply, was found unsatisfactory. (Copy of his reply of Charge Sheet attached herewith as annexure "F").
 11. Incorrect. Proper departmental enquiry was initiated against the appellant and he was fully associated with all proceeding of enquiry as evident from Charge Sheet/Final Show Cause Notice and his replies. After completion of enquiry, the Enquiry Officer submitted his finding report, wherein the appellant was found guilty of the charges leveled against him. Besides, a sufficient opportunity for defense in the shape of personal hearing was also provided to the appellant by the competent authority, but he failed to defend himself. Hence, after fulfillment of all codal formalities, the appellant was awarded major punishment of compulsory retirement from service and his absence period was treated as leave without pay. (copy of enquiry report is attached herewith as annexure "G")
 12. Denied as incorrect. As the appellant was duly informed of his punishment order.
 13. Incorrect. As explained above, the appellant was duly informed of the impugned order when it was issued.
 14. Incorrect and misleading. The appellant was already aware from such punishment order.
 15. Departmental appeal submitted by the appellant was entertained as the relevant record was obtained and the appellant was summoned and heard in person by the appellate authority. However, he failed to present any justification regarding his innocence. Hence, his appeal was rejected on sound grounds as per law.
 16. The revision petition of the appellant was thoroughly examined as per law rules and rejected on sound grounds.
 17. The appellant has been dealt with in accordance with law. Hence, the instant appeal being devoid of merits, may kindly be dismissed on the following grounds.

GROUND:-


- A. Incorrect. The impugned order passed by the competent authority in the case of appellant is legally justified and in accordance with law/rules. .
- B. Incorrect. In fact, the appellant remained absent from lawful duty with effect from 28.05.2021 to 08.06.2021, 22.06.2021 to 24.06.2021 and from 26.06.2021 to 29.06.2021 and later on, he denied the special duty at Azad Kashmir, which absence report was entered vide DD report No. 07, dated 19.07.2021. On account of above absence, he was issued Charge Sheet alongwith Summary of Allegations on 13.08.2021. It is worth to mention here that the appellant did not make his arrival report till the issuance of such Charge Sheet. Therefore, his absence period was not mentioned in the Charge Sheet. However, during pendency of enquiry, the appellant repeated the same practice of absence for several times. Thus his total absence period amounted to 149 days during completion of proceedings as also reported in the punishment order accordingly. On this score, the impugned order is correct and legally justified.


- C. Incorrect. The appellant committed with a gross misconduct by denying of lawful orders of his seniors, which he is under obligation to comply with. Instead he remained absent from duty vide DD report No. 06, dated 19.07.2021 and such report was put up before the competent authority. In this regard the competent authority issued directions to put up complete record file of the appellant with report. (Copy of DD report with the remarks of competent authority attached herewith as annexure "H"). In the light of directions of the competent authority, a report with regard to his absence periods was put up before the competent authority. Thus departmental enquiry was initiated against him. However, as explained in the preceding para No. B above, even after initiating of enquiry, the appellant was again marked absent from duty for several times on different occasions. Such absence reports of the appellant were later on included with the already initiated enquiry proceedings. Therefore, such absence periods were found after the issuance of Charge Sheet and not initially reported in the Charge Sheet. Moreover, a proper and sufficient opportunity at every level of defense has already been provided to the appellant during the course of enquiry by the Enquiry Officer and then by the competent authority. As such the appellant was not deprived of his defense and after fulfillment of all codal formalities he was awarded major punishment of compulsory retirement from service in accordance with law/rules.
- D. Incorrect and denied. Upon the findings of enquiry officer, the appellant was served with Final Show Cause Notice dated 15.09.2021 and at column B of said notice his absence from election duty is clearly mentioned, which is reproduced as under:- (b) "that as reported vide DD No. 07, dated 20.07.2021, a roll call was held at District Police Lines Kohat in connection with General Election at Azad Jammu Kashmir, wherein you was found deliberate absent from duty w.e.f 20.07.2021 to 23.08.2021 and from 25.08.2021 till to date." Moreover, as quoted above, the Final Show Cause Notice in question has been issued to the appellant on 15.09.2021 and at the time of issuance of Final Show Cause Notice, the appellant was still absent from duty as mentioned in the preceding para No. B above. Hence, at the time of issuance of Final Show Cause Notice the appellant was not make his arrival from absence as he was again marked absent from duty with effect from 25.08.2021 to 21.09.2021, 23.09.2021 to 04.10.2021, 17.10.2021 to 25.11.2021 hence, till the issuance of final order the appellant remained absent from duty for total period of 149 days without any leave or prior permission of the competent authority. Thus, the above absence periods have been mentioned in the final order accordingly.
- E. Incorrect. The allegations are false and baseless. In facts the Show Cause Notice in question was earlier issued to the appellant on the allegations of his first absence, which he failed to submit his reply within stipulated period. Thereafter, the appellant while denied the performance of special duty at Azad Kashmir by remaining absent from duty. Hence, he was issued Charge Sheet, to which his reply was found unsatisfactory. Moreover, such Show Cause Notice was separately issued to the appellant and he is supposed to submit his reply within stipulated period, but he failed to do so and after lapse of more than 37 days he desired for submission of combine reply, of Charge Sheet and Show Cause Notice. However, the competent authority considered/admitted such reply of the appellant as reply of Charge Sheet. Therefore, in the final order it has been rightfully mentioned that the appellant failed to submit reply of Show Cause Notice.
- F. Incorrect. The para has already been explained in the preceding para No. 8 & 11 of fact.
- G. Incorrect. As explained in the preceding paras proper departmental enquiry has already been conducted against the appellant, as per law rules.

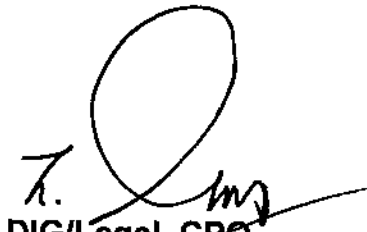
- H. Incorrect. The appellant was absolutely treated in accordance with law within the meaning of Article 4 of the constitution by giving him sufficient and proper opportunities at every level of defense and that the entire proceedings were carried out in accordance with laws and rules.
- I. Incorrect. The allegations are false and baseless. The appellant was already dealt with proper enquiry under the relevant law/rules.
- J. Incorrect. An impartial enquiry has been conducted through enquiry officer in accordance to law/rules, to dig out the actual facts and to meet the justice. Hence, the respondents did not commit any violation of the Article of the constitution of Pakistan.
- K. Incorrect and denied. The appellant was awarded only one punishment of compulsory retirement from service and his period of absence was correctly treated as leave without pay under settled proposition of "No Work No pay". Reliance is placed in PLD 2011/640, PLD 1994-161.
- L. Incorrect. As explained in the preceding para No. 15 that departmental appeal of the appellant was thoroughly examined and rejected being meritless and barred by law and limitation. The decision of Hon'ble, Apex Court of Pakistan quoted by the appellant in the Para is not applicable to case of the appellant.
- M. Incorrect. The length of service of the appellant has already been taken into consideration by the competent authority which he awarded the punishment of compulsory retirement from service by taking lenient view.
- N. Incorrect. Upon perusal of service record, the appellant proved a police officer not interested in his official duties. Hence, the plea of illness taken by the appellant is his self propounded story.
- O. The respondents may also be permitted to raise additional grounds at the time of arguments.

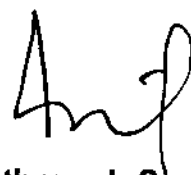
PRAYERS:-

Keeping in view the above facts and circumstances, it is most humbly prayed that the instant service appeal is devoid of merits may kindly be dismissed with costs please.


Superintendent of Police, FRP
 Kohat Range, Kohat
 (Respondent No. 04)
Asad Mehmood
 (Incumbent)


Commandant FRP,
 Khyber Pakhtunkhwa, Peshawar
 Respondent No. 03)
Asif Bahadar (PSP)
 (Incumbent)


DIG/Legal, CPO
For Inspector General of Police,
 Khyber Pakhtunkhwa, Peshawar
 (Respondent No. 02)
Dr. Muhammad Akhtar Abbas (PSP)
 (Incumbent)


Govt. of KP, through Secretary
Home & Tribal Affairs Department,
 Civil Secretariat, Peshawar.
 (Respondent No. 01)
Abid Majeed
 (Incumbent)

(S)

A



OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT
Tel: 0922-9260116 Fax 9260125

ORDER

This order is passed on the departmental enquiry (summary proceedings) against Constable Yasir No. 463 under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Brief facts of the case are that he while posted at PS Jungle Khel willful absented himself from official duty vide DD No. 33 dated 02.04.2019 and reported arrival vide DD No. 19 dated 14.05.2019 and again absented himself from official duty till date.

The defaulter official was served with Show Cause Notice, to which he submitted reply and found un-satisfactory. The defaulter official was called in O.R on 28.05.2019, but he is absent from duty for the last approximate two months shows his disinterest in duty as he is notorious drug smuggler and arms seller.

In view of above and available record, the undersigned reached to the conclusion that the defaulter constable has willfully absented till date and there is no probability of his return/report, which also seems that the defaulter has no interest to serve further. In such circumstances, retention of the defaulter in Police department will be burden on public exchequer. Therefore, in exercise of powers conferred upon me under the rules ibid I, Capt. @ Wahid Mehmood, District Police Officer, Kohat take ex-parte action on the accused constable and award him a major punishment of dismissal from service from the date of his absence. Kit etc issued to the constable be collected and report.

Announced
28.05.2019

DISTRICT POLICE OFFICER,
KOHAT 28/5/19

OB No. 656
Date 3-6- /2019

No. 7025-27 /PA dated Kohat the 03-6- 2019.

Copy of above to the:-
Reader/SRC/OHC/Pay Officer for necessary action.

AHester
S. 28

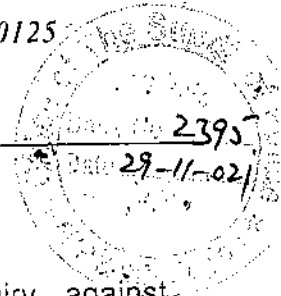
61

"B"



OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT

Tel: 0922-920116 Fax 920125



(B)

ORDER

This order is passed on the departmental enquiry against Constable Yasir No. 5350 Platoon No. 117 under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Brief facts of the case are that he while posted at Police Lines Kohat has absented himself from official duty vide DD No. 22 dated 01.05.2021 and arrival report vide DD No. 43 dated 24.05.2021 (Total absence period 23 days) without any leave or permission from the competent authority, which is gross misconduct on his part.

He was served with Show Cause Notice with the directions to submit a written reply in his defence within stipulated period, but he badly failed to submit any reply of the same, which shows that he is not interest in his job.

In view of above I, Sohail Khalid, District Police Officer, Kohat in exercise of the powers conferred upon me, take ex-parte action against the delinquent official and awarded a minor punishment of "stoppage of one increment without cumulative effect, the absence period un-authorized leave is treated as leave without pay and pay is hereby released.

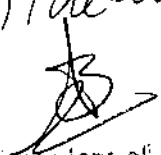

DISTRICT POLICE OFFICER,
KOHAT

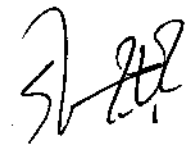
OB No. 884
Date 15-11-2021
No. 6546-48 IPA dated Kohat the 20-11-2021.

Copy of above to the:-

1. Superintendent of Police FRP Range Kohat for information & necessary action
2. Reader/SRC/OHC/Pay officer for necessary action.

OHC/SRC/PO
For n/a action


Superintendent of Police,
FRP Kohat Range,
Kohat
24/11/2021

Attested

DISTRICT POLICE OFFICER,
KOHAT

(12)

OFFICE OF THE DISTRICT POLICE OFFICER KOHAT
SHOW CAUSE NOTICE
(Under Rule 5(2) KPK Police Rules, 1975)

1. That You Constable Yasir No. 5350 Platoon No. 117 have rendered yourself liable to be proceeded under Rule 5 (2) of the Khyber Pakhtunkhwa, Police Rules 1975 (Amendment 2014) for following misconduct:

You while posted at Police Lines Kohat has absented yourself from official duty vide DD No. 22 dated 01.05.2021 and arrival report vide DD No. 43 dated 24.05.2021 (Total absence period 23 days) without any leave or permission from the competent authority, which is gross misconduct on your part.
2. That by reason of above, as sufficient material is placed before the undersigned, therefore it is decided to proceed against you in general Police proceeding without aid of enquiry officer:
3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
4. That your retention in the Police force will amount to encourage in efficient and unbecoming of good Police officers.
5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules, proposes stern action^{///} against you by awarding one or more of the kind punishments as provided in the rules.
6. You are, therefore, called upon to show cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 (Amendment 2014) for the misconduct referred to above.
7. You should submit reply to this show cause notice within 07 days of the receipt of the notice failing which an ex-parte action shall be taken against you.
8. You are further directed to inform the undersigned that you wish to be heard in person or not.
9. Grounds of action are also enclosed with this notice.

No. 2769 /PA

Dated 21-6-2021

Attested

[Signature]

[Signature]
 DISTRICT POLICE OFFICER,
 KOHAT

No. 233 /PA/FRP

Dated. 13 / 08 /2021

CHARGE SHEET

- I) I, Nasir Khan, SP FRP Kohat as competent authority, am of the opinion that you Constable Yasir No. 5350 of FRP Platoon No. 117 District Kohat, have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.
 - (a). That as reported vide DD No. 07 dated 29.06.2021, you have absented yourself from duty on various dates i.e 28.05.2021 to 08.06.2021, 22.06.2021 to 24.06.2021 and 26.06.2021 to 29.06.2021 (total absence period is 16 days).
 - (b). That as reported vide DD No. 07 dated 20.07.2021, a roll call was held at District Police Lines Kohat in connection with General Election at Azad Jammu Kashmir wherein you was found deliberate absent and have not reported back till ^{23.09.2021} date. Thus you have committed a gross "Misconduct" as defined in Rule 2 (iii) of Police Rules 1975".
- II). By reason of the above, you seem to be guilty as sufficient materials is placed before the undersigned, therefore it is decided to proceed against you in general police proceeding.
- III). You are; therefore, required to submit your written reply within 07 days of the receipt of this charge sheet to the Enquiry Officer.
- IV). Your written reply, if any, should reach the Enquiry Officer within specific period, failing which it shall be presumed that you have no defense to offer and in case, ex-parte action shall follow against you.
- V). Intimate as to whether you desire to be heard in person or not?
- VI). A statement of allegation is enclosed.

Attested
[Signature]

M. Y.
13-08-2021

1250
[Handwritten Urdu notes and numbers]
0334-8292274

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

79

پیرالمہ ہسپتال ڈیپارٹمنٹ برائے فزکس اور سرجری 16/11/2013 مورخہ 27/16 اور تاریخ 16/11/2013

233/13 مورخہ 13/11/2013 مورخہ 13/11/2013 مورخہ 13/11/2013 مورخہ 13/11/2013

Paralysed اور جاننا ہے اور مسائل ڈیپارٹمنٹ

درتھار اینڈ پوسٹل سائنس سے مسائل علاج معالجہ کرنا ہے

میں کئی کامیابیاں ہوئی ہیں

جس میں ایک ایسی ہی ڈیپارٹمنٹ اور کئی دیگر ایسی

مرد بیمار ہیں جن کی مدد کرنی ہے اور مسائل سے

توڑی گئی اور مسائل سے کئی مسائل اور مسائل

جو اس ڈیپارٹمنٹ سے تعلق رکھتے ہیں

بہتر انداز میں دیکھا گیا ہے اور مسائل سے

سہولت اور مسائل سے کئی مسائل اور مسائل

جس میں کئی مسائل سے کئی مسائل اور مسائل

الہ آباد

ایک نام لکھو اور مسائل سے کئی مسائل اور مسائل

Attested

Handwritten signature

کوہاٹ ریج

فائنڈنگ رپورٹ

50

جناب عالی!

بحوالہ چارج شیٹ نمبر 233-PA/13-08-2021 برخلاف کنسٹبل محمد یاسر 5350 پلاٹون نمبر 117 متعینہ ڈسٹرکٹ لائن کوہاٹ چارج شیٹ مجاریہ جناب ایس پی ایف آر پی کوہاٹ ریج کوہاٹ محروض ہوں۔ کہ چارج شیٹ نمبر بالا مع دیگر تقلمد غیر حاضری، دیگر کاغذات برخلاف کنسٹبل مذکورہ بالا بابت انکوائری من انسپکٹر E/O کوہاٹ ریج موصول ہو کر جو کہ درجہ ذیل ہیں۔

1- مذکورہ بحوالہ نمبر 7 روز نامہ 20-07-21 سے غیر حاضر ہو کر جو نفی بعض سیشن ڈیوٹی آزاد جموں کشمیر میں جانا تھا۔ مگر مذکورہ کنسٹبل دوران ڈیوٹی غیر حاضر ہو چکا تھا۔ جن کی غیر حاضری رپورٹ بحوالہ مذکورہ بالا روز نامہ درج ہے۔ علاوہ ازیں مذکورہ کنسٹبل قبل ازیں غیر حاضر ہو کر جو چارج شیٹ میں تحریر شدہ ہے۔ علاوہ ازیں بمطابق انکوائری فائل مذکورہ کنسٹبل سزا یافتہ ہے۔ مزید بعض انکوائری مذکورہ کنسٹبل کو طلب کر کے جو مورخہ 18-08-21 کو حاضر آ کر جس نے تحریری بیان معہ پرائیوٹ کلینک ڈاکٹر فرید افریدی کوہاٹ کے میڈیکل کاغذات لا کر پیش کر کے جس پر باقاعدہ سوالات و جوابات کر کے جو تفصیلاً تحریری لف ہذا ہے۔

2- اسی طرح پلاٹون نمبر 117 کے پلاٹون انچارج و محرر کو اس سلسلے میں بعض قلمبندی بیان طلب کیا۔ جس کے متعلق روز نامہ میں باقاعدہ اطلاعی رپورٹ بھی درج کی گئی ہے۔ لیکن انچارج اور محرر نے آنے سے معذرت کر کے اپنے اپنے تحریری بیانات ارسال کر کے مطالعہ کرنے پر پایا گیا۔ کہ پلاٹون انچارج اور محرر نے باقاعدہ طور پر مذکورہ کنسٹبل بعض ایکشن ڈیوٹی منتخب کرنے پر بذریعہ موبائل مطلع کیا تھا۔ اس کے علاوہ بیان میں واضح ہے۔ کہ مذکورہ کنسٹبل کو قسمت LHC نے بھی مذکورہ کنسٹبل کو ڈیوٹی کے متعلق مطلع کیا تھا۔ اسی طرح محرر پلاٹون کے بیان میں واضح ہے۔ کہ اطلاع کے متعلق مہرے ساتھ موبائل آڈیو ریکارڈ بھی محفوظ ہے۔ لیکن مذکورہ کنسٹبل نے پھر وہی بیماری کا بہانہ بنا کر ڈیوٹی پر نا آیا۔ جو باقاعدہ طور پر غیر حاضر کیا گیا ہے۔

علیجاہ

کنسٹبل مذکورہ کے خلاف باریک بینی سے انکوائری کر کے مذکورہ کنسٹبل غیر حاضر باش ہے۔ اس بارے پلاٹون کمانڈر اور محرر پلاٹون کے تحریری بیان ہمراہ لف ہے۔ اور کنسٹبل مذکورہ کو طلب کر کے جس کا تحریری بیان اور میڈیکل کاغذات پرائیوٹ علاج کے کاغذات پیش کر کے جو ہمراہ انکوائری لف ہے۔ اور مذکورہ کنسٹبل ایکشن ڈیوٹی آزاد جموں کشمیر سے غیر حاضر پایا گیا ہے۔ مزید افسران بالا کا حکم افضل

[Signature]

انکوائری افسر

انسپکٹر دوست محمد خان

ایف آر پی کوہاٹ ریج

31-08-21

[Signature]

Issue Final S.C. No. 021-09-21

Attested

[Signature]

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1699/2022.

Muhammad Yasir Ex-Constable No. 5350, Platoon No. 117, FRP Kohat R/o Bannu Road, Village Tapi, Kohat.....Appellant.


VERSUS


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

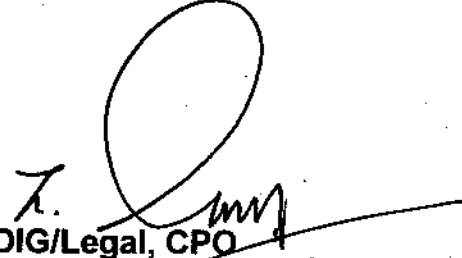
AUTHORITY LETTER


Respectfully Sheweth:-

We respondents No. 1 to 4 do hereby solemnly authorize Mr. Ghassan Ullah ASI FRP HQrs to attend the Honorable Tribunal and submit affidavit/Para-wise comments required for the defense of above Service Appeal on our behalf.


Superintendent of Police, FRP
Kohat Range, Kohat
(Respondent No. 04)
Asad Mehmood
(Incumbent)


Commandant FRP,
Khyber Pakhtunkhwa, Peshawar
Respondent No. 03)
Asif Bahadar (PSP)
(Incumbent)


DIG/Legal, CPO
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
(Respondent No. 02)
Dr. Muhammad Akhtar Abbas (PSP)
(Incumbent)


Govt. of KP, through Secretary
Home & Tribal Affairs Department,
Civil Secretariat, Peshawar.
(Respondent No. 01)
Abid Majeed
(Incumbent)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1699/2022.

Muhammad Yasir Ex-Constable No: 5350, Platoon No. 117, FRP Kohat R/o Bannu Road, Village Tapi, Kohat.....Appellant.


VERSUS

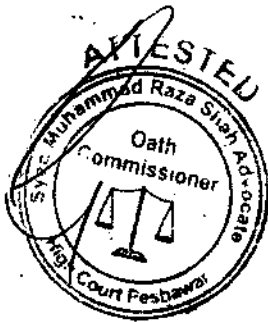
Inspector General of Police, Khyber Pakhtunkhwa, Peshawar & others..... Respondents.

AFFIDAVIT

I respondent No. 04 (Asad Mehmood) 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.


**Superintendent of Police FRP,
Kohat Range, Kohat.
(Respondent No. 04)
Asad Mehmood
Incumbent**



31 MAY 2024