

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 757/2024  
Rafi Ullah Police Constable,  
No.847, District Police Karak

..... (Appellant)

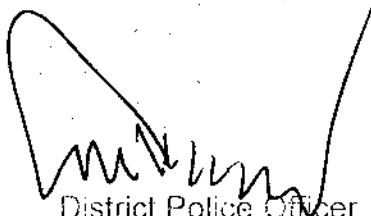
VERSUS

Regional Police Officer, Kohat & others

.....(Respondents)

AUTHORITY LETTER

Mr. Malak Jan Inspector Legal Karak, is hereby authorized/nominated to submit para-wise comments/reply in the instant service appeal in the Hon'ble Khyber Pakhtunkhwa Service Tribunal Peshawar and also to defend instant service appeal on behalf of Respondent's No.1 to 2.



District Police Officer,  
Karak

(Respondent No. 2)

( KHAN KHIAL KHAN ) Provl:



Regional Police Officer  
Kohat

(Respondent No. 1)

(SHER AKBER) PSP, S.St



BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 757/2024  
Rafi Ullah Police Constable,  
No.847, District Police Karak

..... (Appellant)

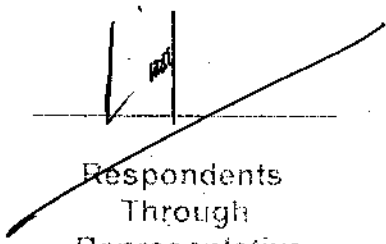
VERSUS

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.....(Respondents

INDEX

S.NO	DESCRIPTION	ANNEXURE	PAGE NO.
1.	Para Wise Comments	-	1-2
2.	Copy of Appellate Authority Order	A	3
3.	Copy of Judgments	B	4-8
4.	Copy of enquiry findings	C	9-19
5.	Affidavit	-	20

  
Respondents  
Through  
Representative

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 15344

Dated 02.09.2024

Service Appeal No. 757/2024  
Rafi Ullah Police Constable,  
No.847, District Police Karak

..... (Appellant)

VERSUS

Regional Police Officer, Kohat & others

.....(Respondents)

PARAWISE COMMENTS QN BEHALF OF RESPONDENTS NO.1& 2

RESPECTFULLY SHEWETH:-

Preliminary Objections:-

- i. That the appellant has got no cause of action to file the instant appeal.
- ii. The appellant has got no locus standi to file the instant appeal.
- iii. That the appellant is estopped by his own conduct to file the instant appeal.
- iv. That the appeal is bad in eyes of law and not maintainable.
- v. That the appellant has not approached the honorable Tribunal with clean hands.

REPLY ON FACTS:

1. First part of the para pertains to initial appointment of the appellant in the year 2007, hence needs no comments. However, for rest of para, burden of proof lies on the shoulders of the appellant. Moreover, plea of the appellant is not plausible because every Police officer is under obligation to perform his duty upto the entire satisfaction of his superior officers. As in this department there is no room lies for lethargy.
2. Incorrect and misleading. Facts are that the appellant while posted as Gunner to the then DSP Hqrs, Karak had left the station without any permission while carrying official weapon, Kalashnikov No.31336-14604241(04241) and placed the said weapon along with magazine unattended on a Charpai outside the shop of Amin Gul TV workshop, Karak. The appellant abandoned the official weapon which was recovered by SI Fazal Hanif, Incharge DSB Karak. Hence, this act of the appellant does come within the purviews of negligence and lethargy.
3. Incorrect and misleading. Proper departmental proceedings were initiated during the course of which it came to light that the official weapon was abandoned by the appellant as also reported vide Daily Diary No.10 dated 09.09.2011 Police Lines, Karak and for the said negligence and non-professionalism, major punishment of dismissal from service was imposed upon the appellant by the competent authority as per law. The appellant's appeal was disposed of by the appellate authority in accordance with rules and law. The appellant did not appear before the appellate authority in the orderly room held on 08.05.2012. Moreover, the appellate authority observed from perusal of record that punishment awarded to the appellant commensurate with his negligence and non-professionalism. Moreover, the appellant was proclaimed offender in case FIR No.453 dated 28.10.2011 u/s 324 PPC PS Yaqoob Khan Shaheed. Thus, the appeal was dismissed having no merits. (Copy of the appellate authority order as Annexure-A).
4. Pertains to the learned Service Tribunal judgment dated 27.09.2023, needs no comments.
5. In compliance of the learned Service Tribunal judgment dated 27.09.2023, Charge Sheet alongwith Statement of Allegations were issued to the appellant and Enquiry panel comprising of Mr. Asad Zubair Khan, SP Investigation, Karak and Mr. Darvesh Khan,

SDPO Fakh-e-Nasrati, Karak was constituted for purpose of conducting de-novo enquiry into the matter. The appellant was summoned and heard in person by the enquiry panel. The finding report held that the defaulter Constable after dismissal from service on 10.09.2011 had moved an appeal before the Regional Police Officer Kohat for setting aside the dismissal order issued by respondent No.2. In the meanwhile, the appellant was booked in a criminal case at his home town vide FIR No.453, dated 28.10.2011 u/s 324 PPC PS Yagob Khan Shaked and by remaining absconder in the case bid, he did not pursue his appeal or turned up before the Regional Police Officer Kohat despite being called for personal hearing in the orderly room on 09.05.2012. Subsequently, his appeal lacking merits was rejected by the appellate authority. During absconding period in the above mentioned case, the appellant was booked again under FIR No.371 dated 04.10.2013 u/s 302/324/34 and FIR No.11 dated 14.01.2015 u/s 324/34 PPC Police station Yagob Khan Shaked. Thereafter, he was arrested by the local Police and sent to judicial lock up. The learned trial court acquitted the appellant in all the criminal cases. Judgment Copies as Annexure-B. Therefore, in the light of observations above, the enquiry panel in the finding report recommended the appellant for reinstatement and the intervening period to be considered as leave without pay. Copy of enquiry findings as Annexure-C.

6. Correct to the extent that departmental appeal of the appellant was rejected by the appellate authority being devoid of substance and merits. Moreover, the appellant has been proceeded in accordance with law and the instant appeal is devoid of merits and liable to be dismissed on the following grounds.

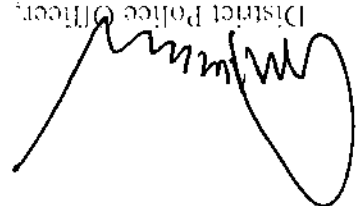
**GROUNDS:**

- A. Incorrect, the order of the respondents are quite legal and strictly in accordance with the law, hence liable to be maintained.
- B. Incorrect, detailed reply is already submitted in paras-3 & 5 above.
- C. Incorrect, the enquiry panel while conducting the de-novo enquiry against the appellant, perused all relevant record and rightly made recommendations regarding intervening period to be treated as leave without pay, because in the said period the appellant remained out of service, hence, on the score of no work no pay, the appellant is not entitled to the same as requested.
- D. Pertains to the august apex court judgments. However, every case has its own facts and circumstances, hence; plea of the appellant in this regard is totally bereft of any substance.
- E. The respondent department may also be allowed to adduce additional grounds at the time of hearing before this Hon'ble Tribunal.

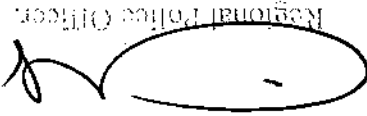
**Prayer:-**

In the light of above facts and circumstances, it is therefore requested that the appeal of the appellant being devoid of merits, may kindly be dismissed with costs, please.

(Respondent No.2)  
Karak  
District Police Officer,  
(KHAN KHAIL KHAN) Prove  
Incumbent



(Respondent No.1)  
Kohat  
Regional Police Officer,  
(SHER AKBAR) PSM, S.S.T)  
Incumbent



3

ORDER.

This order will dispose of representation filed by Ex: constable Rafiullah No. 847 of Karak District against the order of DPO Karak dated 10.09.2011 vide which he was dismissed from his service.

Facts arising of the case are that the appellant was posted as gunman to DSP HQrs: Karak. He had taken official Klashnikov No.31336-14604241(04241) and placed un attended at cot out side the shop of one TV workshop at Karak. Later on the said weapon was taken/recovered by Incharge DSB. During enquiry, it came to light the Klashnikov was abandoned by constable Rafiullah No. 847 (appellant) as reported in Daily Diary of Police Lines Karak vide No. 10 dated 09.09.2011, therefore, due to lethargic and conduct and negligence act of the constable, the DPO Karak while exercising Powers U/s 5(4) of NWFP Removal from Service (Special Powers) Ord: 2000 dismissed him from his service.

Aggrieved from the order he preferred the instant representation and prayed for his reinstatement in service.

He was called in orderly room vide this office Memo: No.3840-43 /EC, dated 24.04.2012 and 4162-66/EC, dated 08.05.2012, but did not turn up.

Perusal of record revealed that the appellant had committed a gross misconduct due to his lethargic conduct and negligence, hence penalty commensurate with the charge was imposed on him by the DPO. He did not appeared in orderly room held on 09.05.2012. Record further reveled that the appellant is PO in case FIR No. 453 dated 28.10.2011 U/Ss 324 PPC PS Yaqoob Khan Shahceed.

In view of the above, the appeal is not substantiated, having no merit and dismissed.

**ANNOUNCED**  
09.05.2012.

*OB/SRC/ASi/PO  
for intaction*

*073 No 546  
to 25-5-12*

*[Signature]*  
**(MOHAMMAD IMTIAZ SHAH)**  
PSP, QPM  
Dy: Inspector General of Police,  
Kohat Region, Kohat.

*[Signature]*  
Karak: No. 4432 /EC, dated Kohat the 15/05 /2012

Copy to District Police Officer Karak for information w/r to his office Memo: No.5003/EC, dated 28.04.2012.

*End S/Recd*

**Attested**  
*[Signature]*  
**DISTRICT POLICE OFFICER**  
**KARAK**

*[Signature]*  
**(MOHAMMAD IMTIAZ SHAH)**  
PSP, QPM  
Dy: Inspector General of Police,  
Kohat Region, Kohat.

CamScanner

In the Court of  
**ZAHID KARIM KHALIL**  
Additional Sessions Judge, Karak at Takht-e-Nasrati

**The State vs. Rafi Ullah**

Case FIR # 11, dated 14.01.2015  
Under Section 324/34 PPC  
Police Station Y.K.S (Takht-e-Nasrati)  
District Karak

**ORDER**  
16.09.2023

1. Accused Rafi Ullah on bail with counsel and Dy.PP for State present. None present on behalf of complainant. Similarly, PWs are also not in attendance.

2. Though the case in hand is fixed for prosecution evidence, however, counsel for accused moved an application u/s 265-K Cr.PC for acquittal of accused.

3. Arguments heard and record perused.

4. The report was lodged by the complainant Shad Nawaz in injured condition, in emergency room of Civil Hospital Takht-e-Nasrati on 14.01.2015 at about 14:50 hours to the effect that he alongwith his wife namely Mst. Shahida Ruqia was going to the house of his maternal aunt when they reached near Primary School Chatta Banda at about 14:15 hours then the accused Ihsan Ullah, Ahmed Ullah sons of Naik Muhammad and accused facing trial Rafi Ullah s/o Fazal Gul, duly armed

ATTESTED  
By  
16.09.2023

stand trial. During trial, it was reported that absconding co-accused Ihsan Ullah is dead, so vide order sheet # 25 dated 23.06.2021, proceedings against him were stand abated.

8. So far six (06) PWs including I.O Inayat Zaman and Doctor Irfan-ud-Din have been examined.

9. Perusal of record would further show that since inception of the proceeding, the complainant did not turn up on single date of hearing nor he is represented by any counsel.

10. PW Farman Ullah, who scribed the murasila report in cross examination had conceded that he doesn't remember whether he proceeded from Police Station or was already present in the hospital at the arrival of the complainant to the hospital. He further conceded that the injury sheet prepared by him do not reflect the number, locale of injuries found on the body of complainant. He negated the stance of the prosecution regarding the time of occurrence and time of report by deposing that he reached to hospital at 14:18 hours and then improved his statement by deposing that he reached at 14:45 hours. Another blow to the prosecution version regarding time

of report came from the statement of the doctor Inayat-Din, who deposed in cross examination that he examined the injured at 05:35 p.m. PW-06 Inayat Zaman, who on arrest of the present accused conducted investigation had admitted that neither injured-complainant nor the alleged eye witness Mst. Shahida Ruqia appeared before him for recording their statements.

11. In view of the above, the Court comes to the definite conclusion that it is a fit case for invoking the provisions of section 265-K Cr.PC, hence the same is invoked and the accused Rafi Ullah s/o Fazal Gul, i/o Chatta Banda Tehsil Takht-e-Nasrati District Karak is acquitted of the charges levelled in the instant FIR. He being on bail is relieved and his sureties are absolved of their liabilities towards bail bonds.

12. The prosecution has examined the official witnesses while the statement of the private witnesses i.e., complainant and Mst. Shahida Ruqia could not be recorded due to their non-appearance. Their statements were already recorded in the earlier round of proceeding u/s 512 Cr.PC, hence while relying on the same, a prima facie case exists against the absconding co-accused

*[Handwritten signature]*  
27/10/23



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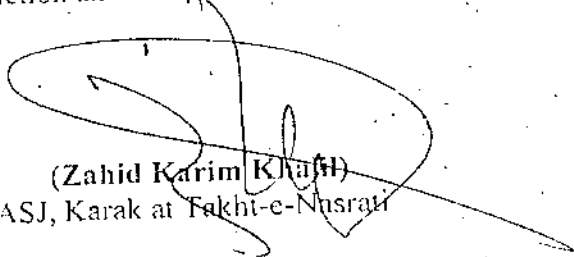
Ahmed Ullah s/o Naik Muhammad, hence he is declared Proclaimed Offender (PO). His name be entered in the register of Proclaimed Offenders. Perpetual warrant of arrest be issued against him.

13. The Case property shall remain intact till the arrest of PO and conclusion of his trial.

14. A copy of this order be placed on police/judicial file, while file of this Court be consigned to the record room after its completion and compilation.

Announced:  
16.09.2023

(Zahid Karim Khan)  
ASJ, Karak at Fakht-e-Nusrati



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Sessions Case # 44/7 of 2020

The State etc vs. Rafi Ullah

ORDER

22.09.2022

*Handwritten mark*

Accused Rafi Ullah produced in custody. Deceased through his son and learned Dy.PP for State present.

Arguments already heard and record perused.

Vide my detailed judgment of today separately placed on file, it is held that Prosecution has miserably failed to prove its case beyond any reasonable shadow of doubt against the accused facing trial. They have further failed to prove that the occurrence took place in the mode and manner as claimed in the FIR. Ocular account is pregnant with inherent inconsistencies and fatal contradictions. Even the presence of the complainant has not been established on the spot, therefore, by extending the benefit of doubt, the accused facing trial, namely, Rafi Ullah is hereby, acquitted of the charges leveled against him in case FIR = 371, dated 04.10.2013, under Sections 302/324/34 P.P.C. Police Station Y.K.S (Takht-e-Nasrati), District Karak. He is in custody, he be set at liberty forthwith if not required in any other cases.

So far as absconding co-accused, namely, Ahmed Ullah is concerned, he is willfully avoiding his lawful arrest and a prima facie case exists against him, therefore, he is declared proclaimed offender and perpetual non-bailable warrant of his arrest be issued with the direction to District Police Officer, Karak to enter his name in the register of P.Os and produce him before Court at the earliest upon his arrest.

Case property be kept intact till arrest and trial of the P.O.

File be consigned to the record room after necessary completion and compilation in accordance with law.

Announced by

22.09.2022

(Zahid Karim Chaudhary)  
ASJ, Karak at Takht-e-Nasrati

19/44/7

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29.10.22

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(Better Copy)

بعدالت جناب ایڈیشنل سیشن جج صاحب تخت نصرتی

سرکام بنام رفیع اللہ

مقدمہ علت نمبر 44/7 میں سال 2020 رجوعہ 05-09-2020 فیصلہ 22-09-2022

**Sessions case # 44/7 of 2020**

**The State etc Vs Rafi Ulah**

**ORDER**

22.09.2022

Accused Rafi Ullah produced in custody. Deceased through his son and learned Dy PP for state present.

Arguments already heard and record perused vide my detailed judgment of today separately placed on file it is held that prosecution has miserably failed to prove its case beyond any reasonable shadow of doubt against the accused facing trial. They have further failed to prove that the occurrence took place in the mode and manner as claimed in the FIR. Ocular account is pregnant with inherent inconsistencies and fatal contradiction. Even the presence of the complainant has not been established on the spot therefore, by extending the benefit of doubt, the accused facing trial, namely, Rafi Ullah is hereby, acquitted of the charges leveled against him in case FIR # 371, dated 04.10.2013 under section 302/324/34 P.P.C police Station Y.K.S (Takht-e-Nasrati) District Karak. He is in custody he be set at liberty for with if not required in any other cases.

So far as absconding co-accused namely, Ahmad Ullah is concerned he is willfully abiding his lawful arrest and a Prima

Facia case exists against him therefore, he is declared proclaimed offender and perpetual non-bailable warrant of his arrest be issued with the direction to District Police Officer, Karak to enter his name in the register of OS and produce him before court at the earliest upon his arrest.

Case property be kept intact will arrest and trail of the P.O File be consigned to the record room after necessary completion and compaction in accordance with law.

Announced

22.09.2022

**(Zahid Karim Khel I)**

**ASJ, Karak at Takht-e-Nasrati**

9

No. 3174 Inv:  
Dated 05/12/2023

FINDINGS

Kindly this, is in response to your good office charge sheet vide Endst: No. 160/Enq: dated 21.11.2023, issued to constable Rafi Ullah No. 847/709 Police Lines Karak whereas the undersigned was appointed as enquiry officer to on earth the real facts.

The upshot of the charges is that "The above named Police official was dismissed from service in the light of allegation that he while posted as Gunner to DSP HQrs Karak had left the station without permission of DSP HQrs Karak. He had also taken official Kalashnikov No. 31336-14604241 (04241). He had placed the said Kalashnikov alongwith magazine unattended at a Charpai outside the shop of one Amin Gul T.V Workshop Karak. He had abandoned the official weapon. The said Kalashnikov was recovered by SI Fazal Hanif, Incharge DSB Karak. Later on, during the course of enquiry, it came to light that the said Kalashnikov was abandoned by he Constable Rafi Ullah No. 847/709. This is quite adverse on his part and shows his carelessness, negligence and non-professionalism in the discharge of his official obligations. Later on in compliance of the KP Service Tribunal Peshawar Judgment dated 27.09.2023 in Service appeal No. 752/Neem/2012 the above named constable has been reinstated in service for the purpose of conducting denovo enquiry vide OB No. 460 dated 01.11.2023."

To probe into the matter, the defaulter constable was summoned in the office of undersigned. He appeared before the undersigned. He was heard in person and recorded his statement, placed on file. He stated in his statement that those days he was posted as Gunner to DSP HQrs Karak. On the eventful day he was on duty with the DSP concerned at his office wherein his Boss directed him to take his T.V set to the mechanic shop. He further stated that he had taken away the T.V set to Peshawari T.V centre situated at Main Bazar Karak. He was present in the T.V mechanic shop in proper uniform as well as duly armed with official weapon. In the meanwhile Fazal Hanif Khan SI entered into the said shop and asked him that what he was doing over there and also started scolding him. In response, the accused official disclosed his position regarding his presence in the shop. Upon which the said SI further frustrated and at once ordered him to hand over his weapon. He also mentioned in his statement that the concerned shopkeeper / mechanic may be asked in this regard so that the position of the matter could be cleared. His detailed written statement along with other documents is enclosed (annexure-A).

Affected

  
DISTRICT POLICE OFFICER  
KARAK

During the course of enquiry the said T.V mechanic namely Niaz Ali s/o Mamoor Khan age about 28/30 years CNIC No. 14202-8856075-9, Mobile No. 0306-8079579 was summoned in the office of undersigned. He appeared before the undersigned and his statement was recorded, placed on file. He stated in his statement that in the year 2011 in the month of September a police official in uniform boarded on motorcycle along with one private person bring a T.V set alighted from motorcycle. The police official having T.V set entered into their shop and disclosed that it was the T.V set of DSP HQrs Bakhtiar Khan and needs repairing. He further stated that upon seeing a Police uniformed person he give up other routine work and started checking of the said T.V and also told the police official not to leave the shop and if there was any little fault then it will be sought out within a few minutes. Meanwhile Fazal Hanif SI in plain clothes entered into the shop and asked constable Rafi Ullah that what he was doing over there in uniform and also started scolding him. Meanwhile during altercation he also took the Kalashnikov from Police official namely Rafi Ullah and left the shop. His detail written statement is enclosed (Annexure-B).

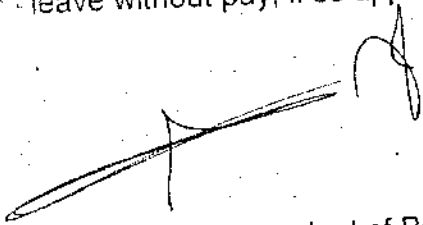
During the course of enquiry the posting card of the above named constable was also procured from your good office copy enclosed. According to the posting card he was enrolled in the department as a constable on 27.07.2007 and successfully recruited on 02.08.2007 PTC Hangu. Thereafter he was transferred / posted at various police stations Guard etc and subsequently dismissed from service on 10.09.2011. Record further revealed that he has been reinstated in his service on 01.11.2023 in the light of Judgment of Honorable Service Tribunal Khyber Pakhtunkhwa Service Appeal No. 752/Neem/2012 duly approved by the Police high-ups with the direction to conduct denovo enquiry as his appeal has been accepted by the Tribunal partially.

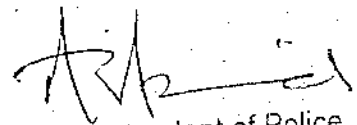
From the bare perusal of the record it has been observed that the defaulter constable after dismissal from service on 10.09.2011, he moved an appeal before the Regional Police Officer for setasiding the dismissal order issued by the then DPO Karak. In the meanwhile he was booked in a criminal case at nis home town under FIR No. 453 dated 28.10.2011 u/s 324 PPC PS Yaqoob Khan Shaheed and remained absconded and did not pursue his appeal before the Regional Police and his appeal and subsequently his appeal was rejected by the Region Police Chief. Similarly, during absconding period in the above mentioned case, he was booked under another FIR No. 371 dated 04.10.2013 u/s 302/324/34 PPC Police station Yaqoob Khan Shaheed and FIR No. 11 dated 14.01.2015 u/s 324/34 PPC Police station Yaqoob Khan Shaheed. Thereafter he was arrested by the police and sent to the judicial lock up. The trial court completed trial in all the cases whereas

Attested  
  
 DISTRICT POLICE OFFICER  
 KARAK

the accused official Rafi Ullah has been declared innocent in all the cases. Both the judgment copies are enclosed. (Annexure-C)

From the enquiry so far conducted the undersigned observed that neither the defaulter official was issued proper charge sheet and statement of allegation nor he was provided an opportunity of personnel hearing / cross examination. Furthermore, from the available record and circumstances, the allegation leveled against the defaulter constable Raif Ullah could not be proved as legal formalities for proper departmental proceeding were not fulfilled. As far as his intervening period is concerned, the same is recommended to be considered as leave without pay, if so approved.

  
Deputy Superintendent of Police,  
Takht-e-Nasrati

  
Superintendent of Police  
Investigation Wing Karak

Attested

  
DISTRICT POLICE OFFICER  
KARAK

Attached

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DISTRICT POLICE OFFICER  
KARAK

Attached

Handwritten signature

Attested

0346-8386987

Handwritten signature

Handwritten text in Urdu script, appearing to be a list or a series of notes. The text is written in a cursive style and is somewhat difficult to decipher due to the handwriting. It seems to contain several lines of text, possibly related to a report or a set of instructions.

DISTRICT POLICE OFFICER  
KARAK

Attached

Police Wagon

XXXX - 10/08/2011

XXXX - 10/08/2011

XXXX - 10/08/2011

XXXX - 10/08/2011

XXXX - 10/08/2011

XXXX - 10/08/2011

XXXX - 10/08/2011

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XXXX - 10/08/2011

XXXX - 10/08/2011

KARAK  
DISTRICT POLICE OFFICER

Attached

DSB Karak  
9/18/2011

Received  
Muzas  
RDPD  
9/19/2011

Handwritten text in Urdu script, appearing to be a report or official communication. The text is dense and difficult to read due to the cursive style and some fading. It includes several lines of text, possibly containing names, dates, and administrative details.

Handwritten signature or name at the bottom of the page.

DISTRICT POLICE OFFICER  
KARAK

Handwritten notes at the top left, possibly a date or reference number.

Attached

Handwritten signature and date: 9/19/2017

Handwritten signature: R. D. P. A.

Main body of handwritten text, appearing to be a list or detailed notes, written in Urdu.

Handwritten text at the bottom left of the main body.

KARAK  
DISTRICT POLICE OFFICER

2011/11/11  
2011/11/11

2011/11/11

Attached

Handwritten notes in Urdu script, including a phone number: 31356-14604291 (04291)

Annexure A  
9/11

Handwritten signature and initials in the top left corner.

Handwritten numbers: 14202-5856075-9 and 0306-8079579

Handwritten text: "MIRZA" and other illegible characters.

Main body of handwritten text, appearing to be a list or detailed notes, written in Urdu.

Handwritten text: "میرزا"

Handwritten text: "28/30" and other illegible characters.

KARAK  
DISTRICT POLICE OFFICER

Atobeg

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3

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 757/2024  
Rafi Ullah Police Constable,  
No.847, District Police Karak

..... (Appellant)

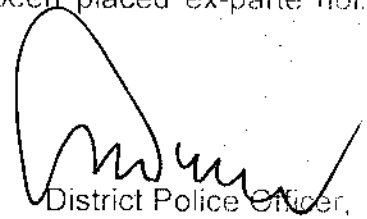
VERSUS

Regional Police Officer, Kohat & others

.....(Respondents

AFFIDAVIT

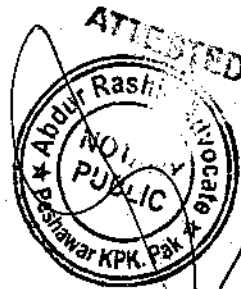
I, Khan Khail Khan District Police Officer, Karak do hereby solemnly affirm on oath that the contents of Para-wise comments on behalf of respondent's No. 1 & 2 are correct to the best of my knowledge/ belief. Nothing has been concealed from this Hon'ble Service Tribunal. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense has been struck off/ lost.



District Police Officer,  
Karak

(Respondent No.2)

(KHAN KHAIL KHAN) Provl:  
Incumbent



2/9/2024