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## KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

EXECUTION NO: \_\_\_\_\_

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*Mr. Naseeb Zaman vs POLICE DEPARTMENT.*

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*Cy/*  
Muharrir Compilation 3/7/24

*[Signature]*  
Incharge Judicial Branch 5/7/24

- 1- Hafiz Muhammad Noor-Ul-Basar S/O Abul Qadar, <sup>AVP</sup>  
Mali, Mardan Public Library, Mardan. (Zone-II).
- 2- Miss Nasim Sikandar D/O Sikandar Khan, Village  
& P.O. Lower Malikpura, Teh: Distt: Abbottabad.  
(Zone-V).
- 3- Mr. Muhammad Arshad S/O Kamal Din, Junior Clerk  
(Admin Section) Agricultural Development Authority,  
Government of NWFP, Peshawar Phase-5-Sector-B-1,  
Hayatabad Town, Peshawar. (Zone-V).
- 7- 4- The name of the following candidate was placed  
on waiting list for the post of Librarian-II.
- 1- Mr. Muhammad Naeem S/O Hidayat Ullah, Railway  
Colony, Railway Station, District Kohat, H.NO.  
164/A (Zone-IV).
- 8- The names of the following candidates were placed  
on waiting list for the post of Junior Clerk.
- 1- Miss Shabana D/O Ghulam Nabi, House No. 3791,  
Mohallah New Dabgari, P.O. Nimak Mandi, Peshawar  
City (Zone-II).
- 2- Mr. Perwaiz Akhtar S/O Muhammad Ilyas, Chowkidar,  
Staff Welfare Organisation, Community Centre, Kohat  
Road, Peshawar (Zone-V).

*Mohd Alam*  
Qazi Muhammad Alam,  
Superintendent,  
Member. (Co-opt).

*Nigar Ali*  
Nigar Ali,  
Research Officer,  
Member/Secretary.

*Tariq Mansoor Jalali*  
(Tariq Mansoor Jalali),  
Chairman.

Confirmed.

*(Ghulam Mustafa)*  
Section Officer-IV,  
Information, Sports, Culture,  
Tourism, Archives & Libraries  
Department, Government of NWFP.

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

**Service Appeal No. 1467/2023**

BEFORE: MRS. RASHIDA BANO ... MEMBER (J)  
MISS FAREEHA PAUL ... MEMBER(E)

Mr. Naseeb Zaman Ex-Constable No. 6328, FRP Bannu Range.  
.....(Appellant)

Versus

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
  2. The Commandant, Frontier Reserve Police Khyber Pakhtunkhwa, Peshawar.
  3. The Superintendent of Police, Frontier Reserve Police Bannu.
- .....(Respondents)

Mr. Taimur Ali Khan,  
Advocate ... For appellant

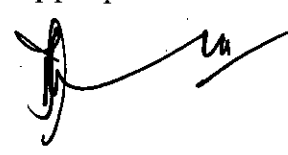
Mr. Asif Masood Ali Shah,  
Deputy District Attorney ... For respondents

Date of Institution.....	07.07.2023
Date of Hearing.....	15.05.2024
Date of Decision.....	15.05.2024

**SCANNED**  
**KPST**  
**Peshawar**

**JUDGEMENT**

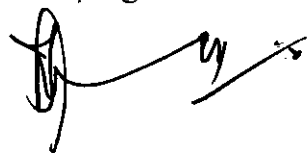
**FAREEHA PAUL, MEMBER (E):** The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 14.03.2022, whereby the appellant was removed from service, against the order dated 15.07.2022, whereby his departmental appeal was rejected and against the order dated 12.06.2023, whereby his revision petition was rejected. It has been prayed that on acceptance of the appeal, the orders dated 14.03.2022, 15.07.2022 and 12.06.2023 might be set aside and appellant be reinstated into service with all back and consequential benefits, alongwith any other remedy which the Tribunal deemed appropriate.



2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was appointed as Constable in the year 2007 in the respondent department. His mother became ill and he was engaged in her treatment and look after during her illness. He filed applications to his high ups for leave, but they did not take any action on his applications and due to engagement in the treatment and look after of his mother, he was compelled to remain absent from his duty. On the basis of that absence, inquiry was conducted, however, the appellant was not associated with the inquiry proceedings and ex-parte action was taken against him. When mother of the appellant recovered from illness, he went to join his duty, but he was informed that he had been removed from service on 14.03.2022 and was handed over his removal order on 05.05.2022. Feeling aggrieved, the appellant filed departmental appeal on 23.05.2022, which was rejected on 15.07.2022. He then filed revision petition on 22.07.2022, which was rejected on 12.06.2023; hence the instant service appeal.

3. Respondents were put on notice who submitted their joint parawise reply on the appeal. We heard the learned counsel for the appellant as well as learned Deputy District Attorney for the respondents and perused the case file with connected documents in detail.

4. Learned counsel for the appellant, after presenting the case in detail, argued that the impugned orders were against the law, facts, norms of justice and material on record, hence not tenable in the eyes of law and liable to be set aside. In the inquiry proceedings, the appellant was not associated and the whole action was taken against him on the basis of ex-parte proceedings. Even



the inquiry report was not provided to him. Charge sheet alongwith statement of allegations and show cause notice were not served upon him which were mandatory before awarding major penalty of removal from service. He argued that absence of the appellant was not willful but his mother was ill which compelled him to remain absent and a lenient view should have been taken against him. He further argued that absence period of the appellant was treated as leave without pay, therefore, there remained no ground to penalize him on that absence and as such the impugned orders were liable to be set aside. He requested that the appeal might be accepted as prayed for.

5. Learned Deputy District Attorney, while rebutting the arguments of learned counsel for the appellant, argued that service record of the appellant revealed that in the past, he was found absent from lawful duty on different occasions for a long period of 1127 days. He was awarded several punishments including two times dismissal from service. He again remained absent from duty w.e.f. 05.11.2021 till his removal from service i.e 14.03.2022 (04 months and 09 days) without any leave or prior permission of the competent authority. He was proceeded against departmentally and was served charge sheet alongwith summary of allegations and his thumb impression was obtained as a token of receipt and an Inquiry Officer was nominated to conduct enquiry into the matter. The appellant was contacted through his cell phone time and again but he did not bother to submit reply to the charge sheet or to appear before the Inquiry Officer to defend himself. He further argued that after fulfillment of all codal formalities, the appellant was awarded major penalty of removal from service. He requested that the appeal might be dismissed.





6. From the arguments and record presented before us, it transpires that the appellant was removed from service on the ground of absence from duty. The appellant absented himself from lawful duty from 05.11.2021 for which he was proceeded against departmentally. Charge sheet and statement of allegations dated 22.12.2021 was issued which was received by him on 20.01.2022. Record produced by respondent department shows that the appellant placed his thumb impression alongwith signature on the charge sheet as a token of receipt, but the same was not responded by him. He also failed to appear before the Inquiry Officer as well as his competent authority when called through the showcause notice. Record further shows that it was not the first time that the appellant absented himself from his lawful duty, rather his previous service was tainted with various punishments on account of his willful absence of 1127 days. As a member of the disciplined police force of the province, the appellant was bound to submit an application and get his leave sanctioned from his competent authority, but he miserably failed to do so and hence made himself liable to be proceeded against departmentally. Learned counsel for the appellant referred to certain judgments of this Tribunal where major penalties in case of absence were set aside, but in all those cases, the appellants themselves were ill and under treatment and because of that they could not submit leave applications and were proceeded against departmentally. In the case in hand, the appellant was perfectly fine but his mother was ill, as stated by him. Such an excuse is not acceptable from a civil servant and a member of police force. The rules governing his service demand discipline from him and make it obligatory to seek permission from his competent authority for any leave.



7. In view of the above discussion, the appeal in hand is dismissed being devoid of merit. Cost shall follow the event. Consign.

8. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 15<sup>th</sup> day of May, 2024.*

  
(FARNEHA PAUL)  
Member (E)

  
(RASHIDA BANO)  
Member(J)

\*FazleSubhan P.S\*

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SA 1467/2023

15<sup>th</sup> May, 2024 . 01. Mr. Taimur Ali Khan, Advocate for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. Arguments heard and record perused.

02. Vide our detailed judgment consisting of 05 pages, the appeal in hand is dismissed being devoid of merit. Cost shall follow the event. Consign.

03. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 15<sup>th</sup> day of May, 2024.*

  
(FAREEHA PAUL)  
Member (E)

  
(RASHIDA BANO)  
Member(J)

\*Fazal Subhan PS\*



16<sup>th</sup> Jan. 2024

1. Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

2. Former made a request for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 15.05.2024 before D.B.

P.P given to the parties.

SCANNED  
KPST  
Peshawar

(Muhammad Akbar Khan)  
Member (E)



(Kalim Arshad Khan)  
Chairman

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30<sup>th</sup> Aug. 2023

1. Learned counsel for the appellant present: Mr. Fazal Shah Mohmand, Additional Advocate General for the respondents present.

2. Reply on behalf of the respondents is still awaited. Learned AAG made a request for adjournment in order to submit reply/comments. Granted by way of last chance. To come up for reply/comments on 22.09.2023 before S.B. P.P given to the parties.

SCANNED  
KPST  
Peshawar



(Kalim Arshad Khan)  
Chairman

\*Mutazem Shah\*

22<sup>nd</sup> Sep, 2023

1. Learned counsel for the appellant present: Mr. Fazal Shah mand, Additional Advocate General for the respondents present.

2. Reply/comments on behalf of respondents submitted. Copy of the same was handed over to the learned counsel for the appellant. To come up for arguments on 16.01.2024 before D.B. P.P given to the parties.

SCANNED  
KPST  
Peshawar



(Kalim Arshad Khan)  
Chairman


\*Abdullahi\*

## FORM OF ORDER SHEET

9


Court of \_\_\_\_\_

Appeal No. 1467/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/07/2023	<p>The appeal of Mr. Naseeb Zaman resubmitted today by Mr. Taimur Ali Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on <u>18.07.2023</u>.</p> <p>By the order of Chairman    REGISTRAR</p> <p>18<sup>th</sup> July, 2023</p> <p>1. Learned counsel for the appellant present and argued that impugned order was passed on 14.03.2022, copy of which was given to him on 05.05.2022 and the appellant challenged it in departmental appeal dated 23.05.2023 which was rejected on 15.07.2022. He then filed revision petition on 22.07.2022 which was also rejected on 12.06.2023. Instant appeal was filed on 07.07.2023 within a statutory period of 30 days. He further argued that appellant was removed from service on the basis of absence which was condoned. He further argued that no regular inquiry was conducted. Thus, appeal of the appellant is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security fee within 10 days. Thereafter, notices be issued to respondents for submission of written reply/comments. Respondents be summoned through TCS the expenses of which be deposited by the appellant. Adjourned. To come up for written reply/comments on 30.08.2023 before S.B. P.P given to learned counsel for the appellant.</p>

SCANNED  
KPST  
Peshawar

SCANNED  
KPST  
Peshawar

  
(Rashida Bano)  
Member(J)

The appeal of Mr. Naseeb Zaman Ex-Constable no. 5323-FRP Bahawalpur dated 07.07.2023 is incomplete on the following score which is returned to the appellant for completion and resubmission within 15 days. (10)

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal are unattested.
- 4- Memorandum of appeal be got signed by the appellant.
- 5- Affidavit be got attested by the Oath Commissioner.
- 6- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on file.
- 7- Annexure-A & F of the appeal are illegible which be replaced by legible/better ones.
- 8- The documents that are to be provided must be legible/readable.
- 9- Five more copies/sets of the appeal along with annexures i.e. complete in all respects may also be submitted with the appeal.

No. 1882 /S.T,

Dt. 10/7 /2023.



REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Taimur Ali Khan Adv.  
High Court Peshawar.

Respected Sir,

1- Removed

2- Removed

3- Removed

4- Removed

5- Removed

6- ~~Removed~~ Copies of charge sheet, statement of allegations, show cause notice, enquiry report were not provided to the appellant, therefore unable to annex with the appeal,

7- Annexure-A & F all replaced by legible copies

8- Removed

9- Removed

Resubmitted after compliance.



13/07/2023

(11)

# KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

## CHECK LIST

Naseeb Zaman

Versus

Police Deptt.

..... Appellant

..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Advocate</u> <u>Court</u>	√	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	√	
3.	Whether appeal is within time?	√	
4.	Whether the enactment under which the appeal is filed mentioned?	√	
5.	Whether the enactment under which the appeal is filed is correct?	√	
6.	Whether affidavit is appended?	√	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	√	
8.	Whether appeal/annexures are properly paged?	√	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	√	
10.	Whether annexures are legible?	√	
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/clear?	√	
13.	Whether copy of appeal is delivered to AG/DAG?	√	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	√	
15.	Whether numbers of referred cases given are correct?	√	
16.	Whether appeal contains cutting/overwriting?	x	
17.	Whether list of books has been provided at the end of the appeal?	√	
18.	Whether case relate to this court?	√	
19.	Whether requisite number of spare copies attached?	√	
20.	Whether complete spare copy is filed in separate file cover?	√	
21.	Whether addresses of parties given are complete?	√	
22.	Whether index filed?	√	
23.	Whether index is correct?	√	
24.	Whether Security and Process Fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	√	
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:- Taimur Ali Khan

Signature:- [Signature]

Dated:- \_\_\_\_\_

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

SERVICE APPEAL NO. 1467/2023

Naseeb zaman

V/S

Police Deptt:

**SCANNED**  
**KPST**  
**Peshawar**

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S.NO.	DOCUMENTS	ANNEXURE	PAGE
1	Memo of Appeal	-----	01-03
2	Affidavit	-----	04
3	Copy of medical raport of the mother of the appellatnt	A	05-14
4	Removal order dated 14.03.2022	B	15
5	Copies of departmental appeal ,order dated 15.07.2022,revision and order dated 12.06.2023	C,D,E&F	16-19
6	Vakalat nama	-----	20

**APPELLANT**

THROUGH:



**(TAIMUR ALI KHAN)**  
**ADVOCATE HIGH COURT**  
Cell# 0333-9390916

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1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

SERVICE APPEAL NO. 1467/2023 Khyber Pakhtunkhwa  
Service Tribunal

6338  
Date No. 07-07-2023

Mr. Naseeb Zaman Ex-Constable No.6328,  
FRP Bannu Range.

(APPELLANT)

VERSUS

1. The Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. The Commandant, Frontier Reserve Police Khyber Pakhtunkhwa, Peshawar.
3. The Superintendent of Police Frontier Reserve Police, Bannu.

(RESPONDENTS)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 14.03.2022, WHEREBY THE APPELLANT WAS REMOVED FROM SERVICE, AGAINST THE ORDER DATED 15.07.2022, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED AND AGAINST THE ORDER DATED 12.06.2023, WHEREBY THE REVISION OF THE APPELLANT WAS ALSO REJECTED.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDERS DATED 14.03.2022, 15.07.2022 AND 12.06.2023 MAY KINDLY BE SET ASIDE AND APPELLANT MAY BE REINSTATED INTO HIS SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY, WHICH THIS HONORABLE TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO, BE AWARDED IN FAVOUR OF APPELLANT.

Filed to-day  
13/7/23  
Registrar

Re-submitted to-day  
and filed.  
13/7/23  
Registrar

✓

✓

✓

**RESPECTFULLY SHEWTH:**

**FACTS:**

1. That the appellant was appointed as Constable in the year 2007 in the respondent Department and completed all his due trainings and since his appointment the appellant has performed his duty duties with zeal and devotion whatsoever assigned to him and no complaint whatsoever regarding his performance.
2. That the mother of the appellant was ill and the appellant was engaged in the treatment and look after of his mother during her illness and the appellant also filed applications to his high ups for leave, but they did not take any action on his applications and due to engagement in the treatment and look after of his mother, the appellant was compelled to remains absent from his duty. (Copy of medical report are attached as Annexure-A)
3. That on the basis of that absence, inquiry was conducted against the appellant, however the appellant was not associated with the inquiry proceeding and ex-parte action was taken against the appellant.
4. That when the mother of the appellant recovered from illness, the appellant went to join his duty, but he was informed that he was removed from service on 14.03.2022 and handed over him his removal order dated 14.03.2022 on 05.05.2022. (Copy of removal order dated 14.03.2022 is attached as Annexure-B)
5. That the appellant being aggrieved from the order dated 14.03.2022 received on 05.05.2022 filed departmental appeal on 23.05.2022, which was rejected on 15.07.2022, the appellant then filed revision on 22.07.2022 which was also rejected on 12.06.2023. (Copies of departmental appeal, rejection order dated 15.07.2022, revision and rejection order dated 12.06.2023 are attached as Annexure-C,D,E&F)
6. That the appellant has no other remedy except to file the instant appeal in this Honorable Tribunal for redressal of his grievance on the following grounds amongst others.

**GROUND:**

- A) That the impugned orders dated 14.03.2022, 15.07.2022 and 12.06.2023 are against the law, facts, norms of justice and material on record, therefore not tenable and liable to be set aside.
- B) That in the inquiry proceeding, the appellant was not associated and whole action was taken against the appellant on basis of ex-parte proceeding, even the inquiry report was not provided to the appellant, which is against the law and rules and as such the impugned orders are liable to be set aside.



- C) That charge sheet along with statement of allegations were not communicated to the appellant before passing removal order which is violation of law and rules.
- D) That show cause notice was not communicated to the appellant before passing the impugned removal order which is against the law and rules.
- E) That the appellant did not intentionally remain absent from his duty but his mother was ill and was engaged in the treatment and look after of his mother due to which he was unable to perform his duty and was compel to remain absent from his duty, therefore, needs to be treated with lenient view.
- F) That the penalty of removal from service imposed upon the appellant is very harsh, which is passed in violation of law and rule, therefore, the same is not sustainable in eyes of law and hence liable to be set aside.
- G) That the absence period of the appellant was already treated as leave without pay, therefore, there remain no ground the penalize the appellant on that absence and as such the impugned orders are liable to be set aside.
- H) That the appellant has not been treated in accordance with law and rules and has been condemned unheard throughout.
- I) That the appellant seeks permission of this Honorable Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

نصیب زمان  
APPELLANT  
Naseeb Zaman

THROUGH:

تایمور علی خان  
TAIMUR ALI KHAN  
(ADVOCATE HIGH COURT)

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4 @

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

SERVICE APPEAL NO. \_\_\_\_\_/2023

Naseeb Zaman

VS

Police Department

**AFFIDAVIT**

I, Naseeb Zaman Ex-Constable No.6328, FRP Bannu Range, (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been concealed from this Honorable Tribunal.



نصیب زمان

DEPONENT

(17)

A (5)



Assistant Professor  
**Dr. Fawad Mehmood Khan**  
Gastro & Medical Specialist  
MBBS, FCPS (Medicine)  
FCPS (Gastroenterology)

Name: Dilshabul Rizvi Age: 55 Sex: ♀ Date: 01/11/2021

Clinical Record

R<sub>x</sub>

cpo  
pain last  
five days  
Headache  
BP high

BP 140/90  
HB 10-2  
Hb1Ac 9.88  
RBS 412

Tab Valdo met 50/50mg  
1PI  
Gib Glucophage 500mg  
Tab  
1PI  
Gib Sofnasid 100mg  
Tab  
1  
Gib Indinol 400mg  
Tab  
1  
Gib Eskem 400mg  
Cap  
1PI  
stool Maltofer  
Tab  
1PI

اسٹنٹ پروفیسر

**ڈاکٹر فواد محمود خان**

ایم بی بی ایس، ایف سی پی ایس (میڈیسن)

ایف سی پی ایس (گیسٹرو لوجی)

گیسٹرو انٹرو لوجسٹ اینڈ میڈیکل سپیشلسٹ

ناہر امراض: معدہ، قلب، سینہ، جگر، شوگر، جوڑ، پیٹہ، فالج، بلڈ پریشر، ہیپاٹائٹس بی اور سی

اسلام میڈیکل سنٹر نزد خوشحال میڈیکل سنٹر ڈگری گارڈن پشاور۔

چھٹی بروز اتوار

Not Valid For Medoco Legal Purposes

Contact: 0302-8189208

ATTSTED

دوا کے لئے 010 010 اور تعریف لائیں۔

18

6



Islam Medical Center Near Khushal Medical  
Center Dabgari Garden Peshawar.  
Contact: +92 (0) 344-9176016  
E-mail : lkramjan016@gmail.com

# Bio Life

PMDC No:11608-N  
HRA: 02333

MEDICAL LABORATORY & DIAGNOSTIC CENTER.

Patient Name	Dilshada Bibi
Age:	55 Yrs
Gender:	Female
Ref By:	Dr Fawad Mehmood Jan
Lab ID:	2323

### Clinical Hematology:

Test	Result	Units	Normal Value
Hb % (Haemoglobin)	10.2	g/dl	Adult Males: 13----17 Adult Females: 12----15
RBC ( Red Blood Cells )	4.81	m/dl	Male: 4.5 --- 5.5 Female: 3.5 --- 4.5
HCT (Packed cell volume)	42.4	%	Males: 36.0 to 48.0 Females 35.0 to 45.0
MCV (Mean corpuscular volume)	88.0	fl	80.0 to 96.0
MCH (Mean corpuscular Haemoglobin)	29.0	pg	26.0 to 32.0
MCHC (Mean corpuscular Haemoglobin concentration)	33.0	g/dl	32.0 to 36.0
TLC (Total Leucocytes Counts)	14.500	/cmm	4,000---11,000
Platelets Counts DLC (Differential Leucocytes counts)	410,000	/cmm	1,50,000---4,50,000
Neutrophils	70	%	40----70
Lymphocytes	20	%	20---40
Eosinophil	06	%	02---05
Monocytes	04	%	02---08

ATTSTED

Monday, November 01,  
2021

Print By: Ikram (A)

Electronically verified report, no signature (s) required.

**Mr.M. Ihtesham**

DMLT KPK  
Medical Faculty Peshawar  
(Govt: LRH Peshawar)

**Mr. Awal Mir**

B.Sc Medical Technologists  
M.Sc Hematology  
(Govt: KGMC)

**Mr. M. Ilyas**

B.S Microbiology  
M.Phil Microbiology

**Mr. Saif (A)**

M.Phil, Microbiology  
B.S HON MLT  
DMLT (KPK) Medical Faculty, Govt: HMC

**Mr. Ikram (A)**

DMLT KPK  
Medical Faculty Peshawar  
(Govt: KTH Peshawar)

Quality Lab Services for all diagnostic tests our performance is quality control & standard of health care solutions

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Islam Medical Center Near Khushal Medical  
Center Dabgari Garden Peshawar.  
Contact: +92 (0) 344-9176016  
E-mail : ikramjan016@gmail.com

Patient Name	Dilshada Bibi
Age:	55 Yrs
Gender:	Female
Ref By:	Dr Fawad Mehmood Jan
Lab ID:	2323

PMDC No:11608-N  
HRA: 02333

**Bio Life**

MEDICAL LABORATORY & DIAGNOSTIC CENTER.

ALT/SGPT:	Result	65	U/I
Ref.Range	(Adults: 10.00 – 50.00)		
Alkaline Phosphates:	Result	236	U/I
Ref.Range	(M:80-306 F:64-306) (Children: 15 Yrs 644 Children :17 Yrs 483)		
Bilirubin Total:	Result	0.8	mg/dl
Ref. Range	(Adult: 0.2 – 1.0) (New Born: 6.00 – 10.00)		
<p>Note: Micromethod on heparinised capillary blood is available for total bilirubin for neonatal jaundice. Reference ranges for neonatal jaundice are for term babies only. Premature babies have wider/higher reference ranges. Ref: Tietz N. Fundamentals of clinical chemistry, Philadelphia: WB Saunders Co, 740 (1987)</p>			

Glucose (R):	Result	412	mg/dl
Ref. Range	(< 200.00)		
<p>Interpretation (ADA 2006) Normal: &lt;100 (F), &lt;200 (2hr); Diabetes Mellitus: &gt;126 (F) or &gt;200 (2hr); Pre-diabetes: Impaired Glucose Tolerance (IGT): 140-200 (2hr); Impaired Fasting Glycaemia (IFG): 100-126 (F). All values mg/dl, venous plasma/serum. True Random plasma glucose value, the one having no relationship with meal has limited screening/diagnostic/prognostic value. For clinical purposes, the diagnosis of diabetes should be confirmed by repeating the test unless there is unequivocal hyperglycaemia with acute metabolic decompensation or obvious symptoms.</p>			

TEST	RESULT	UNIT	NORMAL RANGE
HBA1C	9.89	%	Normal Range:3.80 – 5.80 Diabetic. Good Control: 5.5 – 6.8 Fair Control: 6.8 – 7.6 Poor Control : 7.6--8.0 Un control above 8.0

**ATTSTED**

Monday, November 01,  
2021

Print By: Ikram (A)

Electronically verified report, no signature (s) required.

**Mr.M. Ihtesham**  
DMLT KPK  
Medical Faculty Peshawar  
(Govt: LRH Peshawar)

**Mr. Awal Mir**  
B.Sc Medical Technologists  
M.Sc Hematology  
(Govt: KGMC)

**Mr. M. Ilyas**  
B.S Microbiology  
M.Phil Microbiology

**Mr. Saif (A)**  
M.Phil, Microbiology  
B.S HON MLT  
DMLT (KPK) Medical Faculty, Govt: HMC

**Mr. Ikram (A)**  
DMLT KPK  
Medical Faculty Peshawar  
(Govt: KTH Peshawar)

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هو الشافی

Assistant Professor  
**Dr. Fawad Mehmood Khan**  
Gastro & Medical Specialist  
MBBS, FCPS (Medicine)  
FCPS (Gastroenterology)

Name: Dilshahida Bibi Age: 55 Sex: F Date: 02/12/2021

Clinical Record

BP 139/90

RBS: 323

HB 12.3

R<sub>x</sub>

Tab wildomet 50/500mg  
 (G) 1 + 1  
 Tab Glucophage 250mg  
 (G) 1 + 1  
 Tab Soframic 10mg  
 (G) 1  
 Tab lundacul 10mg  
 (G) 1  
 Tab Maltifer  
 (G) 1  
 Tab E880 400mg  
 (G) 1  
 Cap 1

ATTSTED

اسٹنٹ پروفیسر  
**ڈاکٹر فواد محمود خان**  
 ایم بی بی ایس، ایف سی پی ایس (میڈیسن)  
 ایف سی پی ایس (گیسٹرو لوجی)  
 گیسٹرو انٹرا لوجسٹ اینڈ میڈیکل سپیشلسٹ

Not Valid For Medoco Legal Purposes

ماہر امراض: معدہ، قلب، سینہ، جگر، شوگر، جوڑ، پٹہ، فالج، بلڈ پریشر، ہیپاٹائٹس بی اور سی

Contact: 0302-8189208  
0302-3953379

چھٹی بروز اتوار

اسلام میڈیکل سنٹر نزد خوشحال میڈیکل سنٹر ڈگری گارڈن پشاور۔

دوبارہ معائنہ کیلئے 02/12/2021

21

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Islam Medical Center Near Khushal Medical Center Dabgari Garden Peshawar. Contact: +92 (0) 344-9176016 E-mail : ikramjan016@gmail.com

**Bio Life**

PMDC No:11608-N  
HRA: 02333

MEDICAL LABORATORY & DIAGNOSTIC CENTER.

Patient Name	Dilshada Bibi
Age	55 Yrs
Gender	Female
Ref By	Dr Fawad Mehmood Jan
Lab ID	4130

Clinical Hematology:

Test	Result	Units	Normal Value
Hb % (Haemoglobin)	12.3	g/dl	Adult Males: 13----17 Adult Females: 12----15
RBC ( Red Blood Cells )	4.03	m/dl	Male: 4.5 --- 5.5 Female: 3.5 --- 4.5
HCT (Packed cell volume)	42.4	%	Males: 36.0 to 48.0 Females 35.0 to 45.0
MCV (Mean corpuscular volume)	88.0	fl	80.0 to 96.0
MCH (Mean corpuscular Haemoglobin)	29.0	pg	26 .0 to 32.0
MCHC (Mean corpuscular Haemoglobin concentration)	33.0	g/dl	32.0 to 36.0
TLC (Total Leucocytes Counts)	11,200	/cmm	4,000---11,000
Platelets Counts	339,000	/cmm	1,50,000---4,50,000
DLC (Differential Leucocytes counts)			
Neutrophils	56	%	40----70
Lymphocytes	30	%	20----40
Eosinophil	.07	%	02---05
Monocytes	07	%	02---08

**ATTENDED**

Thursday, December 02, 2021

Print By: Ikram (A)

Electronically verified report, no signature (s) required.

**Mr.M. Ihtesham**  
DMLT KPK  
Medical Faculty Peshawar  
(Govt: LRH Peshawar)

**Mr. Awal Mir**  
B.Sc Medical Technologists  
M.Sc Hematology  
(Govt: KGMC)

**Mr. M. Ilyas**  
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M.Phil Microbiolgy

**Mr. Saif (A)**  
M.Phil, Microbiology  
B.S.HON MLT  
DMLT (KPK) Medical Faculty, Govt: HMC

**Mr. Ikram (A)**  
DMLT KPK  
Medical Faculty Peshawar  
(Govt: KTH Peshawar)

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**Bio Life**

PMDC No:11608-N  
HRA: 02333

MEDICAL LABORATORY & DIAGNOSTIC CENTER.

Patient Name	Dilshada Bibi
Age	55 Yrs
Gender	Female
Ref By	Dr Fawad Mehmood Jan
Lab ID	2323

Glucose (R):	Result	323	mg/dl
Ref. Range	(< 200.00)		
Interpretation (ADA 2006) Normal: <100 (F), <200 (2hr); Diabetes Mellitus: >126 (F) or >200 (2hr); Pre-diabetes: Impaired Glucose Tolerance (IGT): 140-200 (2hr); Impaired Fasting Glycaemia (IFG): 100-126 (F). All values mg/dl, venous plasma/serum. True Random plasma glucose value, the one having no relationship with meal has limited screening/diagnostic/prognostic value. For clinical purposes, the diagnosis of diabetes should be confirmed by repeating the test unless there is unequivocal hyperglycaemia with acute metabolic decompensation or obvious symptoms.			

Thursday, December 02, 2021

Print By: Ikram (A)

**ATTSTED**

Electronically verified report, no signature (s) required.

**Mr.M. Ihtesham**

DMLT KPK  
Medical Faculty Peshawar  
(Govt: LRH Peshawar)

**Mr. Awal Mir**

B.Sc Medical Technologists  
M.Sc Hematology  
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**Mr. Saif (A)**

M.Phil, Microbiology  
B.S HON MLT  
DMLT (KPK) Medical Faculty, Govt: HMC

**Mr. Ikram (A)**

DMLT KPK  
Medical Faculty Peshawar  
(Govt: KTH Peshawar)

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Assistant Professor  
**Dr. Fawad Mehmood Khan**  
Gastro & Medical Specialist  
MBBS, FCPS (Medicine)  
FCPS (Gastroenterology)

Name: Dilshahida Bibi Age: 55 Sex: Q Date: 01/1/2022

Clinical Record

R<sub>x</sub>

lbs 79.1  
Urea: 30  
Creat: 1.1

Tab valdomet 50/500mg  
Q.B 1+1  
Tab sefvasic 10mg  
Q.B 1  
Cap Rulling 40mg  
Q.B 2  
Tab citanew 10mg  
Q.B 1/2  
Q.B 1  
Tab Roxita  
Q.B 1

ATTSTED

اسٹنٹ پروفیسر  
**ڈاکٹر فواد محمود خان**  
ایم بی بی ایس، ایف سی پی ایس (میڈیسن)  
ایف سی پی ایس (گیسٹروالوجی)  
گیسٹرو انٹرا ووجسٹ اینڈ میڈیکل سپیشلسٹ

ماہر امراض: معدہ، قلب، سینہ، جگر، شوگر، جوڑ، پٹہ، فالج، بلڈ پریشر، ہیپاٹائٹس بی اور سی

Not Valid For Medoco Legal Purposes

Contact: 0302-8189208

چھٹی بروز اتوار

اسلام میڈیکل سنٹرز خوشحال میڈیکل سنٹر ڈگری گارڈن پشاور۔

دوبارہ سامانہ کیلئے 0302-8189208

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Islam Medical Center Near Khushal Medical Center Dabgari Garden Peshawar. Contact: +92 (0) 344-9176016 E-mail : ikramjan016@gmail.com

**Bio Life**

PMDC No:11608-N  
HRA: 02333

MEDICAL LABORATORY & DIAGNOSTIC CENTER.

Patient Name:	Dilshada Bibi
Age:	? Yrs
Gender:	Female
Ref By:	Dr Fawad Mehmood Jan
Lab ID:	11452

Glucose (R):	Result	291	mg/dl
Ref. Range	(< 200.00)		
Interpretation (ADA 2006) Normal: <100 (F), <200 (2hr); Diabetes Mellitus: >126 (F) or >200 (2hr); Pre-diabetes: Impaired Glucose Tolerance (IGT): 140-200 (2hr); Impaired Fasting Glycaemia (IFG): 100-126 (F). All values mg/dl, venous plasma/serum. True Random plasma glucose value, the one having no relationship with meal has limited screening/diagnostic/prognostic value. For clinical purposes, the diagnosis of diabetes should be confirmed by repeating the test unless there is unequivocal hyperglycaemia with acute metabolic decompensation or obvious symptoms.			

Blood Urea:	Ref.Range (10 - 50)	Result	30	mg/dl
-------------	---------------------	--------	----	-------

Serum Creatinine:	Ref.Range (M.0.6 - 1.4) (F. 0.6 - 1.2)	Result	1.1	mg/dl
-------------------	---	--------	-----	-------

Saturday, January 01, 2022

Print By: Ikram (A)

**ATTSTED**

Electronically verified report, no signature (s) required.

**Mr.M. Ihtesham**  
DMLT KPK  
Medical Faculty Peshawar  
(Govt: LRH Peshawar)

**Mr. Awal Mir**  
B.Sc Medical Technologists  
M.Sc Hematology  
(Govt: KGMC)

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DMLT (KPK) Medical Faculty, Govt: HMC

**Mr. Ikram (A)**  
DMLT KPK  
Medical Faculty Peshawar  
(Govt: KTH Peshawar)

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Assistant Professor  
**Dr. Fawad Mehmood Khan**  
Gastro & Medical Specialist  
MBBS, FCPS (Medicine)  
FCPS (Gastroenterology)

Name: Dilshabida Bibi Age: 55 Sex: ♀ Date: 03/21/2022

Clinical Record

R<sub>x</sub>

BP 130/90

WBS 39.1

AET 47

Tab valdoxet 50/850mg  
1 FI

Glucophage 250mg  
1 FI

Tab risek 40mg  
1 FI

Cap 2/1001  
citranew 10mg  
1 FI

Tab 8/1001  
chen cul  
1 FI

Tab 8/1001  
ostia  
1 FI

Cap 2/1001

ATTSTED

اسٹنٹ پروفیسر  
**ڈاکٹر فواد معمود خان**

ایم بی بی ایس، ایف سی پی ایس (میڈیسن)

ایف سی پی ایس (گیسٹرو لوجی)

گیسٹرو انٹرو لوجسٹ اینڈ میڈیکل سپیشلسٹ

ماہر امراض: معدہ، قلب، سینہ، جگر، شوگر، جوڑ، پٹہ، فالج، بلڈ پریشر، پیپٹائٹس بی اور سی

Not Valid For Medoco Legal Purposes

Contact: 0302-8189208

چھٹی بروز اتوار

اسلام میڈیکل سنٹر نزد خوشحال میڈیکل سنٹر ڈگری گارڈن پشاور۔

دوا دہ مہار کیلئے... 8/1001... بعد شرف لائیں۔

26

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Islam Medical Center Near Khushal Medical  
 Center Dabgari Garden Peshawar.  
 Contact: +92 (0) 344-9176016  
 E-mail : ikramjan016@gmail.com

PMDC No:11608-N  
 HRA: 02333

**Bio Life**

MEDICAL LABORATORY & DIAGNOSTIC CENTER.

Patient Name	Dilshada Bibi
Age:	55 Yrs
Gender:	Female
Ref By:	Dr Fawad Mehmood Jan
Lab ID:	556

Glucose (R):	Result	391	mg/dl
Ref. Range	(< 200.00)		
Interpretation (ADA 2006) Normal: <100 (F), <200 (2hr); Diabetes Mellitus: >126 (F) or >200 (2hr); Pre-diabetes: Impaired Glucose Tolerance (IGT): 140-200 (2hr); Impaired Fasting Glycaemia (IFG): 100-126 (F). All values mg/dl, venous plasma/serum. True Random plasma glucose value, the one having no relationship with meal has limited screening/diagnostic/prognostic value. For clinical purposes, the diagnosis of diabetes should be confirmed by repeating the test unless there is unequivocal hyperglycaemia with acute metabolic decompensation or obvious symptoms.			

ALT/SGPT:	Result	47	U/l
Ref.Range	(Adults: 10.00 – 50.00)		

Thursday, February 03, 2022

Print By: Ikram (A)

**ATTSTED**

Electronically verified report, no signature (s) required.

**Mr.M. Ihtesham**  
 DMLT KPK  
 Medical Faculty Peshawar  
 (Govt: LRH Peshawar)

**Mr. Awal Mir**  
 B.Sc Medical Technologists  
 M.Sc Hematology  
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 DMLT (KPK) Medical Faculty, Govt: HMC

**Mr. Ikram (A)**  
 DMLT KPK  
 Medical Faculty Peshawar  
 (Govt: KTH Peshawar)

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B 15

**ORDER**

My this order will dispose off the departmental proceedings initiated against Constable Naseeb Zaman No.6328 who remained absent from Govt: duty till date of removal vide Daily Diary No.45 dated 05-11-2021 Police Line Manshra without any leave or prior permission of the competent authority. Thus he was properly charge sheeted with appointment of Enquiry Officer of FRP Bannu Range for proper Departmental Enquiry against him.

The Enquiry Officer deeply probed into the facts and conducted enquiry with submission of his findings report wherein the E.O reported that the charge sheet was served upon him on 20-01-2022, upon which the defaulter official did not replied to the charge sheet within the stipulated period. Besides efforts were made to call him for facing enquiry proceedings, but he always avoid to face the enquiry and deliberately absented himself, thus there was no alternative but to initiate ex-parte proceedings against him. During ex-parte proceedings the E.O. examined the relevant record and also recorded statements of concerned officers. Resultantly the defaulter official was reported to have been found guilty of the charges leveled against him, even did not bother to make arrival back for duty. Finally the Enquiry Officer declared him a wilful and habitual absentee and recommended him for imposition of Major punishment. Consequently Final Show Cause bearing No.378 dated 03-03-2022 was issued to him, but the defaulter official denied and refused to receive the said Final Show Cause. He was summoned time and again to appear before the competent authority for personal hearing but he did not appear so far, resultantly it was presumed that he don't want to produce any defense. Moreover, previously he also remained absent from duty for (127) days with award of certain punishments but he did not mend his way. Therefore his retention in Police department is no more required.

Therefore I, Ahdul Sattar Superintendent of Police FRP Bannu Range Bannu, being competent authority in exercise of the powers conferred to me under the Police Rules 1975 do hereby impose upon him the Major punishment of Removal from Service with immediate effect. The absence period is also treated as leave without pay because of non-performance of Govt: duty for the entire period.

OB No. 230

Date: 07/04/2022

No. 609 dated 14/03/2022.

Copy to: ✓  
PO, SRC & OHC for necessary action.

all or  
Superintendent of Police,  
FRP, Bannu

Handwritten signatures and notes in Urdu, including "کسب زمان" and "5-5-2022".

5-5-2022

گزشتہ دنوں میں کئی مسائل پولیس ڈیپارٹمنٹ میں بطور کانسٹبل سبب سے سامنے  
 FRP / 111555 میں رپورٹی سر انجام دے رہا ہے۔ مسائل کو کچھ دن پہلے ہی  
 چلا ہے مگر آپ کو بتا رہا ہوں 2022-3-14 کی ڈیٹ پر 609 اور 22-4-7  
 Removal of name سے جو چاہیے لیے اس میں کو ابھی تک کسی نہ اطلاع سرکاری  
 میں فون نہیں کیا ہے اور مسائل کو روزنامہ سے کوئی کھال آیا ہے۔ لیکچر اس میں  
 سال بہت سخت بیماری سے مسائل جو جنی بائیسر جھانپا ہے تو حال علاج کیے  
 پائے۔ تو لیکچر آپ سے ہوا ہے کہ بڑا بڑا درد و واحد اس میں ہے کہ مسائل پر دم کرتے  
 اپنی ہی حال سے علاج کیے گئے مسائل کو دو دو ملاؤ نہت پر حال کرنے کا حکم ملدو فرماوین  
 ہے آپ سے ہوا ہے کہ بڑا بڑا درد و واحد اس میں ہے کہ مسائل میں سال سے سولہ اور  
 ہر پندرہ اور ستھ کی بیماری میں قبل ہے تو مسائل میں سال سے پندرہ مرتبہ مسائل کو دو دو بار  
 ازمنہ پر حال کرنے کا حکم ملدو فرماوین

اس میں لیکچر

زیادہ آدھ بھولی  
 23-05-2022  
 قورع

انجیلان لیکچر  
 لیکچر زمان بہت  
 6328  
 FRP  
 68797332

ATTSTED

29  
G-P  
D.O.

**ORDER**

This order will dispose of the departmental appeal preferred by Ex-constable Naseeb Zaman No. 6328 of FRP Bannu Range, against the order of SP FRP Bannu Range, Bannu issued vide Order Endst; No. 609, dated 14.03.2022, wherein he was awarded major punishment of removal from service. The applicant was proceeded against on the allegations that he absented himself from lawful duty with effect from 05.11.2021 till the date of his removal from service i.e 14.03.2022 for a period of 04 months 09 days, without any leave or prior permission of the competent authority.

In this regard, proper departmental proceedings were initiated against him as he was issued Charge Sheet alongwith Statement of Allegations and Enquiry Officer of FRP Bannu Range was nominated to conduct proper enquiry against him. After completion of enquiry the Enquiry Officer submitted his finding report, wherein he reported that the Charge Sheet was served upon him on 20.01.2022, but he failed to submit his reply within stipulated period. The enquiry officer further reported that he was called time and again for facing enquiry proceedings, but he always avoid to face the enquiry and deliberately remained absent from his lawful duty. Finally the enquiry officer found him guilty of the charges leveled against him and recommended that ex-parte action.

Upon the finding of Enquiry Officer, he was issued/served with Final Show Cause Notice bearing No. 378, dated 03.03.2022, but he denied and refused from the receiving of the said notice. Besides, he was summoned time and again for personal hearing, but he did not bother to appear before the competent authority.

Keeping in view the above narrated facts and other material available on record, he was awarded major punishment of removal from service vide Order Endst; No. 609, dated 14.03.2022.

Feeling aggrieved against the impugned order of SP FRP Bannu Range, Bannu, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 07.07.2022.

During the course of personal hearing, the applicant failed to present any justification regarding to his prolong absence. From perusal of enquiry file it has been found that the allegations of willful absence were fully established against him. From perusal of his service record the applicant was found a habitual absentee having a tainted service record. Therefore any leniency or complacency would further embolden the accused officer and impinge upon adversely on the overall discipline and conduct of the force. There doesn't seem any infirmity in the order passed by the competent authority, therefore no ground exist to interfere in same.

Based on the findings narrated above, Commandant FRP, Khyber Pakhtunkhwa, Peshawar, being the competent authority, has found no substance in the appeal, therefore, the same is rejected and filed being meritless.

Order Announced.

Commandant  
Frontier Reserve Police  
Khyber Pakhtunkhwa, Peshawar

No. 589-90 /PA, dated Peshawar the 15/10/2022

Copy of above is forwarded for information and necessary action to

the

1. SP FRP Bannu Range, Bannu, His Service roll sent herewith
2. Ex-constable Naseeb Zman No. 6328 S/o Rasool Zaman R/o Village 1981, Kano Police Station Domel, District Bannu.

F حضرت صاحب السیکن سنیل آغا پولیس ڈیپارٹمنٹ

مکتوب : درخواست برائے رقم اجمالی نوکری

صفا ب عا می !

گذشتہ شش ماہ سے کہ معاملے FRP Range میں ڈیپارٹمنٹ  
 میں تمام کاموں کا اہتمام کیا گیا۔ مسائل جو مورخہ 05/11/2021 تا 13/11/21  
 میں پیش آئے ہیں، ان میں سے کئی مسائل کا اہتمام FRP  
 کے مسائل کو مورخہ 15/7/2022 کو سرکسٹیکٹ کیا گیا۔ کئی مسائل  
 مسائل کی والدہ صاحبہ سے مل کر اہتمام کیا گیا ہے جس سے فائدہ  
 استفادہ ڈیپارٹمنٹ سے ہوا ہے ڈاکٹر صاحب  
 کا نام خواد محمود خان ہے۔ مسائل ضلع میں سے استفادہ  
 کرنے والے اور ان کا علاج کرنے کی وجہ سے غیر  
 حاضر ہیں۔ تمام مسائل کے مسائل و تیز رفتاری سے اہتمام  
 مسائل کے اہتمام، ضلع اہتمام میں ان کو توجہ سے دینی  
 کے درجہ سے اہتمام ہے کہ ان کے مسائل کا علاج کریں تاکہ  
 اس میں کوئی سہولت نہ ہو۔

10075/SB

Director of the Police Department  
 0332-9737857  
 0334-8430916

درجہ بالا مسائل کو مد نظر رکھتے ہوئے مسائل کے  
 پولیس میں اہتمام کرنے کا اہتمام درج ذیل کے مسائل  
 ضروری ہے تاکہ مسائل کے والدین کا علاج جاری  
 رہے۔ مسائل کے اہتمام میں خاندان سے تعلق  
 رکھنے والے مسائل کو اہتمام دینا  
 عین ذمہ داری ہے

22-7-2022

الیا رفیق  
 ڈیپارٹمنٹ

FRP  
 Banu  
 سابقہ سنیل  
 0332-9737857  
 0334-8430916

0332-9737857  
 0334-8430916

ATTSTED





31

F 199

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted Ex-FC Naseeb Zaman No. 6328. The petitioner was removed from service by SP FRP Bannu Range vide order Indst No. 609, dated 14.03.2022 on the allegations that he absented himself w.e.f 05.11.2021 till the date of removal from service i.e. 14.03.2022 for a period of 04 months and 09 days. The Appellate Authority i.e. Commandant FRP Khyber Pakhtunkhwa, Peshawar rejected his appeal vide order Indst. No. 589-90/PA, dated 15.07.2022.

Meeting of Appellate Board was held on 02.06.2023 wherein petitioner was heard in person. Petitioner contended that his mother was ill.

Petitioner failed to advance any plausible explanation in rebuttal of the charges. Therefore, the Board decided that his petition is hereby rejected.

Sd/-

RIZWAN MANZOOR, PSP  
Additional Inspector General of Police,  
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. SI/536-41-/23, dated Peshawar, the 12 - 06 /2023.

Copy of the above is forwarded to the:

1. Commandant FRP, Khyber Pakhtunkhwa Peshawar. Service Record alongwith D.File of the above named Ex-FC received vide your office Memo: No. 7817/SI Legal, dated 23.09.2022 retained herewith for your office record.
2. SP FRP Bannu Range.
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.

(MUHAMMAD AZHAR) PSP  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

ATTSTED

سروس رٹریبونل لیسٹور

SCANNED  
KFST  
Peshawar

لعیب زمان  
2 منجانب  
لعیب زمان بنام محکمہ ریس

مورخہ

مقدمہ

دعویٰ

جرم

### باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام لیسٹور کیلئے سمجھوتہ علی خان ایڈووکیٹ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے

سب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔

کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

Accepted  
& Attested

20

ماہ

المرقوم

العبد گواہ العبد

لعیب زمان

33

*prov*

Treasury / Sub-Treasury  
Chalan of Cash paid into the Peshawar

State Bank of Pakistan

CHALAN NO.

Peshawar

To be filled in by the remitter				To be filled in by the Departmental officer or the Treasury	
By whom tendered	Name or Designation and address of the person on whose behalf money is paid	Full particulars of the remittances and of authority (if any)	Amount	Head of Account	Order to the Bank *
				SI-11215 3501001	

Name

*Security fee (Refundable)  
Rs-100/- One Lakh only  
in appeal No. 1467/23  
Naseeb Zaman*

Date

CHAIRMAN  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Correct  
Received and grant  
receipts.  
Signature and full  
designation of the  
officer ordering the  
money to be paid in

Signature

Total (A) *100/-*

(a) (in words) Rupees

*One Lakh only*

\* To be used only  
in the case of  
remittances to Bank  
through an officer  
of the Government.

Received

Date

Treasurer

Accountant

Particulars

Treasury Officer

**PROVINCIAL**  
**RECEIPT ACCOUNT-1**

Amount *100/-*

Paisa

Head of Account Verified  
at Treasury Office Peshawar

Coin.

Notes (with details)

Cheques (with details)

Total :

CHAIRMAN  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

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**Note 1 :** In the case of payments at the Treasury Receipts for sums less than Rs. 500 do not require the signature of the Treasury Officer but only of the Accountant and the Treasury Receiver. However for cash and cheques paid for service stamps should always be signed by Treasury Officer Act of C.A. Code Vol. I

**Note 2 :** Particulars of money tendered should be given on the reverse.

**Note 3 :** In case where direct credit at Bank are permissible the columns "Head of account" will be filled in by the Treasury Officers, or the Accounts Officers as the case may be on receipts of the Bank Daily Sheet.

---

In case of "Duty on Impressing Documents" the amount creditable to each of the following detailed heads be noted :

- (a) Duty on embossing on anna receipt and cheque stamps.
- (b) Duty "On documents voluntarily brought" for adjudication (Section 31, Act II of 1899).
- (c) Duty on unstamped or insufficiently stamped documents levied under Chapter IV of Act II of 1899.
- (d) Other Items.

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KPST  
Peshawar  
22/9/23

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1467/2023.

Mr. Naseeb Zaman Ex-constable No. 6328 FRP Bannu Range,  
Appellant

**VERSUS**

Commandant FRP, Khyber Pakhtunkhwa, Peshawar &  
others Respondents.

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4.	Charge Sheet, Enquiry Report, SC	C; D, E	06-09
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6.	Authority Letter		11
Total			21

  
**RESPONDENTS**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

ANNEXED  
XPST

Service Appeal No. 1467/2023.

Mr. Naseeb Zaman Ex-constable No. 6328 FRP Bannu Range, 22/9/23  
Appellant.

**VERSUS**

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar & others.....Respondents.

**PARAWISE REPLY BY RESPONDENTS 1 to 3.**

RESPECTFULLY SHEWETH.

**PRELIMINARY OBJECTIONS:-**

Khyber Pakhtunkhwa  
Service Tribunal  
Dinwari 7753  
Date 22/09/23

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 enlisted in police department as admitted, while the rest of Para is incorrect as perusal of his service record reveals that in past he was found remained absent from lawful duty on different occasions for a long period of 1127 days, which he awarded several punishments including tow times dismissal from service. (Copies of punishment orders attached herewith as annexure "A & B").
2. Incorrect. The appellant was remained absent from lawful duty with effect from 05.11.2021 till the date of his removal from service i.e 14.03.2022, for total period of 04 months & 09 days, without any leave or prior permission of the competent authority. The plea of illness of his mother as well as submission of leave application is a propounded story.
3. Incorrect. On the allegations of willful absence the appellant was proceeded against proper departmentally as he was issued Charge Sheet alongwith Summary of Allegations and an Enquiry officer was nominated to conduct enquiry into the matter and to unearth the actual facts. The Charge Sheet was served upon him by the Enquiry Officer and his tomb impression was obtained as a token of receipt, but he deliberately failed to submit his reply or to appear before the Enquiry Officer to defend himself. (Copy of Charge Sheet attached herewith as annexure "C").
4. Incorrect. As the appellant was failed to report his arrival or to join his duty, despite the fact he was summoned time and again by the Enquiry Officer.

However, after fulfillment of all codal formalities required as per law he was awarded major punishment of removal from service.

5. Correct to the extent that departmental appeal submitted by the appellant was thoroughly examined and rejected on sound grounds. The revision petition of the appellant was also thoroughly examined and rejected.
6. Incorrect. 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 dated 14.03.2022 and 15.07.2022 are legally justified and in accordance to law/rules hence, the instant appeal is liable to be dismissed.
- B. Incorrect. The allegations are false and baseless. As proper departmental enquiry has already been initiated against him and it is evident from Charge Sheet and summary of allegations, which were properly served upon him during the course of enquiry, but he failed to submit his reply. Besides, the appellant was also contacted by the Enquiry Officer through his cell phone No.03329737687 time and again, but he did not bother to join the Enquiry proceedings by meaning thereof that he was no more interested in the service of Police Department hence, the Enquiry Officer found him guilty of the charges leveled against him and recommended for major punishment. Moreover, the appellant further failed to approach for obtaining of the findings of enquiry. As such the whole proceedings against the appellant were adopted in accordance to law/rules. (D)'
- C. Incorrect. The allegations are false and baseless. The Charge Sheet and Summary of Allegations were issued and served upon him and his tomb impression was obtained on duplicate copy of Charge Sheet as a token of receipt, but he failed to submit his reply. The copy of such Charge Sheet has already annexed with Para No. 3 of facts as annexure "C".
- D. Incorrect. Upon the findings of Enquiry Officer the appellant was issued a The Final Show Cause Notice however, he deliberately refused from the receiving of said notice. "(E)'"
- E. Incorrect. The appellant was remained absent from lawful duty with effect from 05.11.2021 till the date of his removal from service i.e 14.03.2022, for total period of 04 months & 09 days, without any leave or prior permission of the competent authority. The plea of illness of his mother and submission of is a propounded story and he supposed to have taken this plea before the Enquiry Officer or before the competent authority.
- F. Incorrect. The penalty of removal from service awarded to the appellant is legally justified and commensurate with the gravity of his gross misconduct.

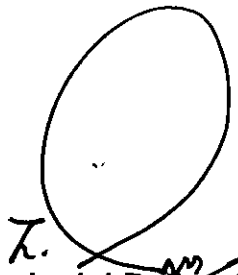
- G. Incorrect. The absence period of the appellant was correctly treated as leave without pay by the competent authority as according to Police Rules 1975 amended in 2014, leave without pay is not fallen in the ambit of punishment. Hence, the appellant was imposed only the punishment of removal from service as per law.
- 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 existing laws and rules.
- I. 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 devoid of merits may kindly be dismissed with costs please.

  
**Superintendent of Police FRP,**  
 Bannu Range, Bannu  
 (Respondent No. 03)

  
**Commandant FRP,**  
 Khyber Pakhtunkhwa, Peshawar  
 (Respondent No. 02)

  
**Provincial Police Officer,**  
 Khyber Pakhtunkhwa, Peshawar.  
 (Respondent No. 01)



(42) (4) ✓ 'A'

**ORDER**

This order shall dispose of the enquiry proceedings pending against Constable Naseeb Zaman No.6328/FRP as the official was charged for commission of the following miss-conduct.

Reported to have reported to have found absent from duty w.e.from 22-02-2021 to 19-07-2021 for the total absence period of (147) days without any leave or legal permission of the competent authority.

On the above charges he was properly charge sheeted & appointed as Enquiry Officer with the directions to conduct enquiry into the matter within stipulated period.

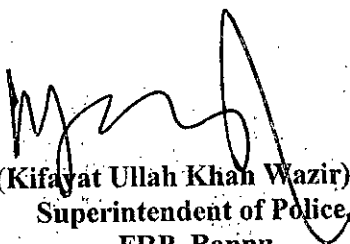
Enquiry Officer conducted enquiry into the allegation and submitted his findings, wherein defaulter official have found guilty of the charges leveled against him. That defaulter official replied to the charge sheet within stipulated period. In reply to the charge sheet he took the plea of his domestic problems. Finally Enquiry Officer declared him willful and habitual absentee and recommended him for imposition of Punishment. Consequently he was issued with Final Show Cause Notice vide No.1084 dated 17-07-2021, which was properly served upon his on 15-09-2021. Moreover, previously you had remained absent for (929) days and were awarded punishment for the same but you did not mend your trend.

He was also heard in person, during the course of hearing he advanced cogent reason in his defense, his plea was found plausible and satisfactory.

Keeping in view the above facts and as well as his poor family back ground I, take a lenient view he (NASEEB ZAMAN No. 6328/FRP). However the absence period (90) days treated as without pay & and remaining (57) days absence period treated as Earned Leave, stoppage of One (01) Increment without cumulative for one year and pay released.

OB No. 468

Dated: 29/10/2021

  
(Kifayat Ullah Khan Wazir) PSP,  
Superintendent of Police,  
FRP, Bannu

ORDER

(43) (5)

'B'

This order shall dispose of the enquiry proceedings pending against Constable Naseeb Zaman No.6328/FRP as the official was charged for commission of the following /miss-conduct.

Reported to have found absent from duty w.e. from 02-01-2021 to 22-02-2021 for the total absence period of (51) days without any leave or legal permission of the competent authority.

On the above charges he was properly charge sheeted & appointed as Enquiry Officer with the directions to conduct enquiry into the matter within stipulated period.

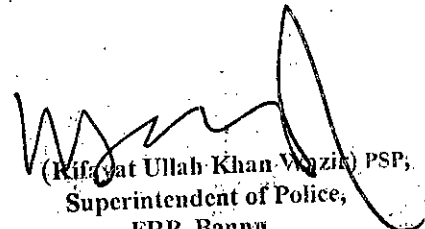
Enquiry Officer conducted enquiry into the allegation and submitted his findings dated 24-02-2021, wherein defaulter official have found guilty of the charges leveled against him. That defaulter official replied to the charge sheet within stipulated period. In reply to the charge sheet he took the plea of his domestic problems. Finally Enquiry Officer he was rendered guilty for the allegation and recommended him for the imposition of punishment. Moreover, previously you had remained absent for (929) days and were awarded punishment for the same but you did not mend your trend.

He was also heard in person, during the course of hearing he advanced cogent reason in his defense, his plea was found convincing and satisfactory.

Keeping in view the above facts and as well as his poor family back ground I, take a lenient view he (Naseeb Zaman No.6328/FRP). However the absence period (15) days treated as without pay & remaining (36) days absence period treated as Earned Leave and stoppage of One increment without cumulative for one year and pay release.

OB No. 88

Dated: 24/02/2021.

  
(Rifaat Ullah Khan Wazir) PSP,  
Superintendent of Police,  
FRP, Bannu

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(8)

"C" 13/11/2021

**CHARGE SHEET**

I, **Abdul Sattar**, Superintendent of Police FRP, Bannu as competent authority, hereby charge you Constable **Naseeb Zaman No. 6328/FRP** for the purpose departmental enquiry proceedings as follows.

➤ That you Constable **Naseeb Zaman No. 6328/FRP** absented yourself from lawful duty without any sanctioned leave or prior permission of the competent authority vide Daily Diary No.45 dated 05-11-2021 to till date, at Police Line Manshehra. Pay has been stopped to this effect.

➤ Such act on your part is against service discipline and amounts gross misconduct/ negligence in duty.

1. By reason of the above you appear to be guilty of misconduct under the Police Rules 1975 (As amended vide Khyber Pakhtunkhwa gazette Notification, No.27<sup>th</sup> of August 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.
2. You are therefore, directed to submit your defense within 07 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, failing which, it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.
4. You are directed to intimate whether you desire to be heard in person.
5. A statement of allegation is enclosed.

Sattar

Superintendent of Police,  
FRP, Bannu

03329737687

آدم نور نسیم لیس زمان 6328

11101-3165293-7 CNIC

دستخط لیس زمان

نشان انگوشٹ

03329737687

20-01-2022

(45) (7) 'C/2'

**STATEMENT OF ALLEGATIONS**

I. Abdul Sattar Superintendent of Police FRP, Bannu as competent authority, to initiate departmental proceedings against Constable Naseeb Zaman No. 6328/FRP, who has rendered himself liable to be proceeded against as he has committed the following misconduct within the meaning of Police Rules (As amended vide Khyber Pakhtunkhwa gazette Notification, No.27<sup>th</sup> of August 2014).

**SUMMARY OF ALLEGATIONS**

- That you Constable Naseeb Zaman No. 6328/FRP absented yourself from lawful duty without an sanctioned leave or prior permission of the competent authority vide Daily Diary No.45 date 05-11-2021 to till date, at Police Line Mansehra. Pay has been stopped to this effect.
  - Such act on your part is against service discipline and amounts gross misconduct/ negligence in duty.
1. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegation: Mr. SI/PC Mira Khan is appointed as Enquiry Officer.
  2. The Enquiry Officer shall provide reasonable opportunity of hearing to the accused, record statements etc. and findings within the targeted days after the receipt of this order.
  3. The accused shall join the proceedings on the date, time and place fixed by the Enquiry Officer.

*Sattar*  
Superintendent of Police,  
FRP, Bannu

No. 1929-30 Dated: 22/12/2021

**Copy to:**

1. The Enquiry Officer
2. The Accused Officer/Official.

صاف بنائی!

مستعمل جاری شدہ سہری اور اسٹیٹ بہ 1929-30، انٹوائٹری کاغذات پر معلق کیے گئے۔  
 6328  
 نصیب نہ مانا جائے۔ ضرورتوں کے تحت بیوں۔ جو کم کاٹنے کے لئے مذکورہ بالا لکھنؤ ریٹرن میں مذکورہ  
 سے غیر حافی مد 45 روز نامہ 05 11/21 سے بدستور ملنے حافی حلالہ اریا کے لئے مذکورہ  
 ملنے حافی مد 45 روز نامہ 05 11/21 پر افسران بالا مہاجران کے بحالہ B تم 520  
 مورخ 11/21 کے تحتی ملے اور پھر اسٹیٹ جاری شدہ کے احکامات جاری کیے گئے۔  
 اسٹیٹ جاری شدہ بہ 1929 مورخ 21/21 کی لئے مذکورہ پر مورخ 22/21 کو تقسیم کر کے  
 تاکہ افسران بالا کے احکامات کی تعمیل ہو سکے۔ بعد از تعمیل کاروائی کی لئے مذکورہ  
 کا حال کی لئے مذکورہ اندر عباد جواب جاری شدہ میں نہیں کی اور نہ ہی غیر حافی  
 سے حافی کی رپورٹ کی ہے۔ نیز کی لئے مذکورہ کا بحالہ انگریزی آرڈر نم 14-116-AS-1  
 مورخ 12/21 کے تحت FRP بیوں ریٹرن بیوں سے FRP ملائے گئے۔ ریٹرن انگریزی آرڈر  
 میں موجود ہے۔

2007 SRC کے بارے میں = صاف بنائی کی لئے مذکورہ سابقہ SRC کے بارے میں مطابق سال 2007  
 FRP کے لئے مذکورہ کا کوئی سروں 14 سال 07 ماہ اور 14 دن نہیں ہے۔ کی لئے مذکورہ  
 تا بد دران سروں قسط اوقات میں کوئی (1127) ایسے غیر حافی کی لئے مذکورہ  
 50 انگریزی کے ملے، 80 انگریزی جاری ملے، شیڈول برقی اسٹیٹ ریٹرن میں 07 ماہ  
 اور 15 ایسے کی لئے مذکورہ کا موجودہ سروں میں سے انگریزی تدرہ ہے۔

فائلنگ نمبر = صاف بنائی کی لئے مذکورہ جو ریٹرن میں ملے۔ مذکورہ 45 روز نامہ 05 11/21  
 سے بدستور ملنے حافی حلالہ اریا کے لئے مذکورہ سرید فوری کا حالیان  
 نہیں ہے۔ کی لئے مذکورہ جاری ملنے حافی بائیں کے لئے مذکورہ کا سابقہ SRC کے بارے میں  
 بنائیت میں داخلہ ہے۔ کی لئے مذکورہ کا کوئی (1127) ایسے غیر حافی سابقہ SRC کے بارے میں انگریزی  
 تدرہ ہے۔ کی لئے مذکورہ سرکاری نوکری میں رجسٹری نہ نہ کھتے پر جاری شدہ کا جواب اندر عباد  
 جمع نہ کرنا۔ افسران بالا کے احکامات کی تعمیل نہ کرنا۔ مورخ 05 کو ملنے حافی سے بدستور  
 ملنے حافی مد 45 پر ریٹرن یا شہینہ کا مقدار ہے سرید حکم افسران بالا کا انتقال ہے۔

FRP.Ban  
 01/3/2022

Issue final show  
 case notice  
 03/3/22

(47)

(9)

"E"

No. 378

Dated. 03 /03/ 2022

**FINAL SHOW CAUSE**

I, **Abdul Sattar**, Superintendent of Police, FRP Bannu Range, Bannu as competent authority, under Rule 5(3) of the Khyber Pukhtunkhwa Police rules (As amended vide Khyber Pakhtunkhwa gazette Notification, No.27<sup>th</sup> of August 2014) for the following misconduct hereby serve upon you **Naseeb Zaman No.6328** this final show cause notice.

- That Constable **Naseeb Zaman No.6328 /FRP** has absent himself from lawful duty without any sanctioned leave or prior permission of the competent authority w.e.from 05-11-2021 till date at Police Line Mansehra. Your pay has been stopped to this effect.
- Such act on your part is against service discipline and amounts gross misconduct/ negligence in duty.

That consequent upon the completion of enquiry conducted through enquiry officer FRP, Bannu submitted findings report and reported that the allegations contained in the charge sheet have fully been proved against the defaulter Constable **Naseeb Zaman No.6328 /FRP** is proved.

As a result. I, as a competent authority, have tentatively decided to impose upon you one for more punishments including dismissal as specified the rules.

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

If no reply to this notice is received within seven days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

The copy of the findings of the Enquiry Officer is enclosed.

*Sattar*  
Superintendent of Police,  
FRP, Bannu

*[Signature]*

اللہ ع

آرام صبر 19/3/22 گوت 10:57 ع

مذکورہ کے ذیلی نمبر 0332 9737 687

میں اللہ ع رہا گئی کہ سزا کیلئے پوری ہے

سزا میں آج رہا گئی سزا کیلئے سزا کیلئے

کے میں

۸۶۰

۱۹۳۲۲

اللہ ع

آرام صبر 23/3/22 گوت 09:40 ع

مذکورہ کے ذیلی نمبر 0332 9737 687

میں اللہ ع رہا گئی کہ سزا کیلئے پوری ہے

سزا میں آج رہا گئی سزا کیلئے سزا کیلئے

کے میں

۸۶۰

اللہ ع

آرام صبر 29/3/22 گوت 12:12 ع

مذکورہ کے ذیلی نمبر 0332 9737 687

میں اللہ ع رہا گئی کہ سزا کیلئے پوری ہے

سزا میں آج رہا گئی سزا کیلئے سزا کیلئے

کے میں

۸۶۰

29.3.22

48 (10)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No. 1467/2023.**

**Mr. Naseeb Zaman Ex-constable No. 6328 FRP Bannu Range,**  
.....Appellant.

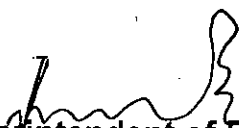
**VERSUS**


**Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar &**  
.....Respondents.

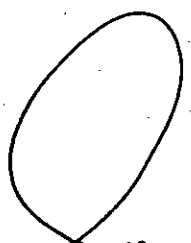
**AFFIDAVIT**

We respondents No: 1 to 3 do hereby solemnly affirm and declare on oath that the contents of the accompanying Para-wise Comments is correct to the best of our 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,**  
Bannu Range, Bannu  
(Respondent No. 03)

  
**Commandant FRP,**  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 02)

  
**Provincial Police Officer,**  
Khyber Pakhtunkhwa, Peshawar.  
(Respondent No. 01)

**ATTESTED**

  
Notary Public  
Complex Peshawar  
22-06-2023



49 (11)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1467/2023.

Mr. Naseeb Zaman Ex-constable No. 6328 FRP Bannu Range,  
.....Appellant.

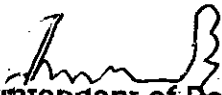
**VERSUS**


Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar &  
others.....Respondents.

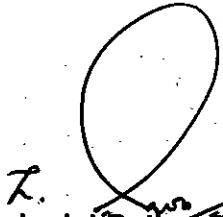
**AUTHORITY LETTER**

Respectfully Sheweth:-

We respondents No. 1 to 2 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,  
Bannu Range, Bannu  
(Respondent No. 03)

  
Commandant FRP,  
Khyber Pakhtunkhwa, Peshawar  
(Respondent No. 02)

  
Provincial Police Officer,  
Khyber Pakhtunkhwa, Peshawar.  
(Respondent No. 01)