

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No. 1072 of 2024

Ex Head Constable Sher Khan Son of Mashey Lal, Polec Department, Police Line District
Upper Chitral

Buni.....(Petitioner)

VERSUS

1. Regional Police officer, Malakand Division, Office D9W2+CM3 Shahi Bagh Saidu Sharif Swat, Khyber Pakhtunkhwa.....(Respondent)
2. District Police office, District Upper Chitral Buni..... (Respondent)
3. District Accounts officer District Upper Chitral Booni..... (Respondent)

(Reply on behalf of Respondent No.03)

DISTRICT ACCOUNTS OFFICER CHITRAL UPPER

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Deponent

SHAKEEL AHMAD

DISTRICT ACCOUNTS OFFICER (BPS-18)

CNIC: 6110129791559

Cell: 03009153550

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

Appeal No. 1072 of 2024

Khyber Pakhtunkhwa
Service Tribunal

Dary No.

15992

Date

23-09-24

Ex Head Constable Sher Khan Son of Mashey Lal, Polec Department, Police Line District Upper Chitral Buni.....(Petitioner)

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PARAWISE COMMENT/REPLY ON EEHALF OF RESPONDENT NO. 03 (DISTRICT ACCOUNTS OFFICER UPPER CHITRAL)

PRELIMINARY OBJECTIONS: -

1. That the appellant has no case of action.
2. That the appellant has not come to this forum with clear hand.
3. That the appeal of the appellant is based on malafide, fraud and misrepresentation.
4. That this Honorable court has no jurisdiction to entertain the said appeal as the departmental appeal is pending before competent forum.

P to.

On Facts: -

1. Para No.01 is correct, hence need no reply.
2. Para No.02 is to the extend that according to retirement order the appellant retired in 2023, but the Service Book of appellant show that his birth date is 02-01-1962 and later on alteration has been made in his Service Book and over writing clear show on Page No.01 of the Service Book (Copy of Service Book is attached as Annexure A)
3. Para No.03 is correct that observation has been raised to the effect that correct date of birth of appellant is 02-01-1962, but later on alteration and over writing has been made in Page No.01 of the Service Book
4. Para No.04 is correct, that on the basis of the said observation deduction has been made from the appellant according to law and rules.
5. That Para No.05 is incorrect false as according to Service Book of appellant his correct date of birth is 02-01-1962, but later on appellant fraudulently made alteration in his Service Book which is clear from the over writing on the very first Page of Service Book therefore, the deduction has been made according to law.
6. That Para No.06 of the appeal is related to other respondent hence need no reply.
7. That Para No.07 is false, incorrect hence denied, as the said deduction has been made on the basis of appellant false and misrepresentation and concealment of his correct date of birth.

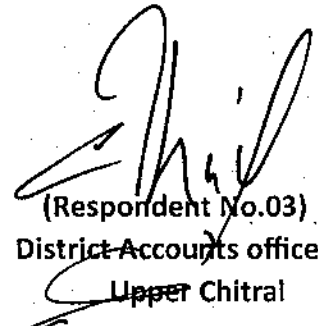
Grounds

- A- Denied that the deduction has been made according to law as the as the appellant was involve in fraud by altering his date of birth and over writing on Service Book.
- B- Denied that the Service Book was in possession of respondent No.01, 02 and over writing found on very first page of appellant Service Book at the time of Pension.
- C- Denied, as the Service Book was in possession of respondent No.01,02 and the reply respondent found over writing in Page No.01 of appellant Service Book at the time of Pension.

P+0

- D- Denied, Detail reply has been given in above Paras.
- E- Denied that according to Service Book of appellant his date of birth is 02-01-1962 but later on over writing his been made by appellant.
- F- Denied as the same order is according to Law, and Rules.
- G- Denied:

In view of the above narrated legal and factual grounds it is humbly prayed that the appeal of appellant may kindly be dismissed.


(Respondent No.03)
District Accounts officer
Upper Chitral
Shakeel Ahmad

CHARACTER AND SERVICE ROLL OF

CONSTABULARY NO. (698) in
 DISTRICT () in
 DISTRICT () in

DISTRICT.
 DISTRICT.
 DISTRICT.

Name	Father's Name	Tribe or caste	Village or Town	Post and Telegraph Office	Police Station	District	Province	Date of Birth	Height	Chest Measurement	Date of Enrolment	Age on Enrolment	Distinctive Marks
Shankar	Maghraj Dal.	Kashyap	Belain	Maharaj	-	Chitral	N.W.A.P.	21/1/1968 (21 Jan 1968)	5-6	32 1/2 x 34	15/1/1983	20 Years	A little wound Scar on R.H. Side of face heard.

Verification Roll No. 112 dated 23/12/82 received back and attached to the Fauji Miscal.

Government Service prior to present employment, which is approved for pension service.

Service or department	Rank or Grade	Pay of last Appointment	From	To	PERIOD		
					Years	Months	Days

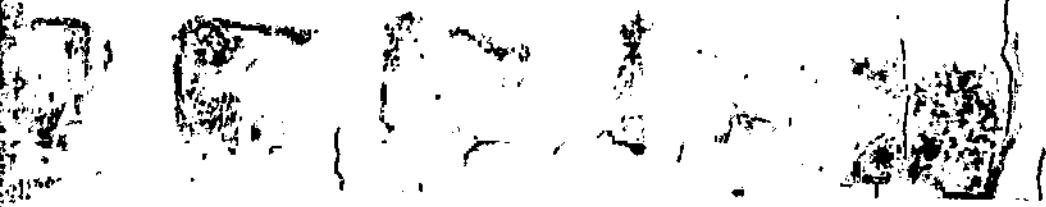
Reason of and character of discharge from above service.

Reference to orders approving above service for pension service in the Police Department.

I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that section and the provisions of the Act and of the Rules issued thereunder, and now in force, by which my discipline and conduct are governed, has been explained to me. I agree to serve faithfully under the provisions of the said Police Act and to obey all lawful orders issued to me by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have received a certificate of appointment issued under section 8 of the Police Act (V of 1861).

Roller impression of fingers and thumb of left hand.

Left little	Left ring	Left middle	Left index	Left thumb



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AFFIDAVIT

I, Shakeel Ahmad District Accounts officer Chitral Upper/Lower (BPS-18) do hereby solemnly affirm and state on oath that the parawise comments/reply on petition is true & correct to the best of my knowledge & belief and nothing has been concealed from the August Court.

It is further added on oath that that is this appeal, the answering respondent neither has been placed ex parte nor their defence has been struck off/cost.


SHAKEEL AHMAD
DISTRICT ACCOUNTS OFFICER
CHITRAL UPPER/LOWER

CNIC: 6110129791559

Cell: 03009153550

ATTESTED

