FORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

rvice Appeal No. 1854/2023.
Seessan Waheed Ex-Recruit Constable No. 5385 R/O Bahadar Colony Near D.C. Officer Pindi Road Kohat.....Appellant.

VERSUS

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

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1854/2023.

VERSUS

Commandant FRP, Khyber Pakhtunkhwa, Peshawar & other......Respondents.

PARAWISE REPLY BY RESPONDENTS 1 to 5.

RESPECTFULLY SHEWETH.

PRELIMINARY OBJECTIONS:-

Khyber Pakhtukhwa Service Tribunal

mary No. 14567

Wated 29-07- 2021

- 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. Incorrect. The appellant alongwith his colleague constable Naeem Gul while undergoing basic recruit course tried to pay Rs. 20,000/- in denominations of Rs. 1000/- which were found to be forged upon enquiry. Consequently, appellant and his colleague were returned to their parent district as unqualified.
- 2. Pertains to record needs no comments.
- 3. Pertains to record.
- 4. Correct to the extent that the appellant was appointed as constable and deputed for Basic Recruit Course at PTC Hangu. However, during recruit course the appellant involved himself in illegal activities as discussed in Para No. 1 above.
- 5. Pertains to record.
- 6. Pertains to record needs not comments.
- 7. Incorrect. The appellant alongwith his colleague recruit constable Naeem Gul while undergoing recruit course at PTC Hangu were caught red handed by the Mess Manager and recovered fake/forged currency notes. During the preliminary enquiry it has established that the above forged notes were handover by the appellant to his colleague trainee quoted above. Besides, on the statement/identification of recruit constable Naeem Gul Rs. 3000/-in denomination of Rs. 1000/- were also recovered from the possession of the appellant in the presence of witnesses. Such currency notes were subsequently sent to State Bank of Pakistan vide Commandant PTC Hangu office letter No. 111 dated 08.03.2024. (Copy of preliminary enquiry and Letter of Commandant PTC Hangu are attached herewith as annexure "A & B").
- 8. Correct to the extent that during the course of enquiry, the fake currency notes recovered from the possession of the appellant and his colleague, were submitted to State Bank of Pakistan for verification, hence after examination the State Bank of Pakistan verified such currency note as fake/forged vide letter No. CLPF.158/2022-16981, dated 11.03.2022. (Copy of State Bank verification letter attached herewith as annexure "C").
- 9. Correct to the extent that due to deceitful/unlawful attitude the appellant was returned to his home district as unqualified vide order dated 03.03.2022.
- 10. Correct to the extent that in wake of above serious allegations the appellant was proceeded against proper departmentally, for which he was issued Charge Sheet alongwith Summary of Allegations and DSP Asad Mehmood was appointed as Enquiry Officer to probe into the matter. (Copy of Charge Sheet and his reply attached herewith as annexure "D & E).
- 11. The reply of Charge Sheet submitted by the appellant was found unsatisfactory as he failed to justify his position.

- Correct to the extent that proper departmental enquiry has been conducted against the appellant and upon the findings of Enquiry Officer the appellant was served with final Show Cause Notice, in response of which he submitted his reply. However, his reply was found unsatisfactory by the competent authority. After fulfillment of all codal formalities he was awarded major punishment of removal from service as per law/rules. (Copies of departmental enquiry, Final Show Cause Notice and his reply are attached herewith as annexure "F, G & H").
- 13. The departmental appeal of appellant was examined by the appellate authority, besides, he was heard in person, but he failed to present any justification regarding his innocence. Hence, his appeal was rejected on sound grounds.
- 14. The revision petition of the appellant was thoroughly examined and rejected on sound grounds.
- 15. Incorrect. The orders passed by the competent authority is legally justified and in accordance to law/rules. Hence the appellant has got no cause of action to file the instant appeal and the same is liable to be dismissed with cost.
- 16. 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.

GROUNDS:-

- A. Incorrect. The orders passed by the respondents are in accordance with law/rules.
- B. Incorrect. Proper departmental enquiry has been conducted against the appellant as evident from Charge Sheet and Show Cause Notice. However, such misconduct of the appellant was accrued in the Police Training Centre Hangu, hence, just preliminary enquiry was initiated into the matter by the authority of PTC Hangu and after confirmation of the said misconduct the appellant was returned to his home district/Unit i.e FRP Kohat Range as unqualified vide OB No. 67, dated 31.03.2022. On account of misconduct as discussed in the preceding Paras the competent authority i.e SP FRP Kohat Range initiated proper departmental enquiry against the appellant as per law/rules.
- C. The para has already explained in the preceding paras.
- D. Incorrect. The respondents have not committed any illegality nor violated any right of the appellant, rather he was treated as per law/rules.
- E. Incorrect. The authority of PTC Hungu is not competent in the case of appellant. As such the appellant was on the strength of FRP Kohat Range and deputed for Basic Recruit Course to PTC Hangu. After preliminary enquiry he was returned as unqualified to his home district for initiating of proper departmental enquiry. In this regard Standing Order No. 02/2014 clause 6-4 provided that the SP FRP of concerned range is a competent authority and he is responsible for the general administration, welfare and discipline of the FRP strength placed in the region/district concerned hence, in case the strength of FRP placed in the district etc just the operational command of the FRP strength so place has rest with the District Head of Police concerned. Thus SP FRP Kohat Range being a competent authority has been conducted proper departmental enquiry as the appellant was issued Charge Sheet and DSP Asad Mehmood was nominated as Enquiry Officer to conduct enquiry into the matter and to dig out the actual facts. Keeping in view all of above the order of returning of the appellant to his home district as unqualified is legally justified and in accordance with law/rules.
- F. Incorrect. During the preliminary enquiry, the statements of all concerned were recorded by the Enquiry Officer and on the basis of the written statement of the recruit constable Naeem Gull the Enquiry Officer correctly reported in his findings that such 20 thousands fake/forged currency notes were handover, by the appellant to recruit constable Naeem Gul. It is worth to mention here that the stance of Naeem Gul has also been admitted by the appellant in his written statement. (Copies of the statement of recruit constable Naeem Gul and the appellant are attached herewith as annexure "I & J"). Moreover, Rs.03 thousands fake/forged currency was also recovered from the possession of the appellant in presence of witnesses. However, all recovered fake currency notes were later on verified by the State Bank of Pakistan as bogus/forged.
- G. Incorrect. The Para has already explained in the preceding Para. However, on the very next day Rs. 3000/- in denomination of Rs. 1000/- were also recovered from the possession of

the appellant in presence of witnesses. (Copies of the statements of witnesses attached herewith as annexure ", K, L, M, N, O, P, Q, R & S).

- Incorrect. Reply already given in the preceding Paras.
- I. Incorrect. The reply of Charge Sheet submitted by the appellant was examined and found unsatisfactory by the Enquiry Officer as the appellant failed to advance any proof of evidence with regard to his innocence.
- Incorrect. The appellant was fully associated with the enquiry proceeding as evident from J. Charge Sheet and his reply. Besides, the statements of all witness were also recorded by the Enquiry Officer in the presence of appellant.
- K. Incorrect. As the Enquiry proceedings against the appellant was conducted in accordance to law/rules as explained in the preceding Paras.
- L. Incorrect. The statements of all witnesses were record in the presence of the appellant by the Enquiry Officer. Besides, during the course of enquiry the appellant was provided proper opportunity of defense, personal hearing as well as ample opportunity of cross examination. The Enquiry Officer examined all relevant factors of the case being based on evidence.
- M. Incorrect. The appellant and his colleague committed cognizable offence, but the Deputy Commandant PTC Hangu by taking lenient view returned the appellant and his colleague as unqualified, thus criminal case was not registered.
- Incorrect. The allegations are false and baseless. There was no compulsion from the staff of N. PTC Hangu to depress the appellant for admitting his guilt. However, the guilt of the appellant was already proved during enquires without any shadow of doubt.
- O. Incorrect. The respondents have not denied from providing of enquiry report to the appellant. However, a sufficient opportunity of personal hearing has already been provided to the appellant by the competent authority, which he availed too, but he failed to prove himself innocent.
- Ρ. Incorrect. As explained in the preceding Para 13 of facts.
- Q. Incorrect. As explained in the preceding Para 14 of facts.
- R. Incorrect. The revision petition of the appellant was rejected as found footing.
- S. Incorrect. It has been directed in impugned rejection order of revision petition issued by CPO Peshawar that the appellant shall be informed with regard to his rejection order. Hence, in compliance with the direction of CPO the appellant was informed by the respondent No. 02 accordingly and a copy of the same order has also been provided to him well in time. However, the appellant failed to institute the instant appeal within time; hence the same is time barred and liable to be dismissed on this ground.
- T. Incorrect. The appellant has got no cause of action to file the instant appeal; however, the appellant was treated in accordance to the existence low/rule.
- U. The respondents may also be permitted to raise additional grounds at the time of arguments.

PRAYERS:-

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

Superintende

Kohat Range, Kohat (Respondent No. 02)

Asad Mehmood (Incumbent)

Commandant FRP, K hyber Pakhtunkhwa, Peshawar

(Respondent No. 03)

Syed Ashfaq Anwar (PSP) (Incumbent)





OFFICE OF THE COMMANDANT POLICE TRAINING COLLEGE HANGU Office Phone # 0925-621886 Fax 0925-620886

To:

The Manager,

State Bank of Pakistan,

Peshawar.

No.

/// /PO, Dated Hangu, the 8th March, 2022.

Subject:

VERIFICATION OF CURRENCY

Memorandum:

It is intimated that a sum of Rs. 1000/- each and the total amount of Rs. 23000/- (twenty-three thousand) have been sealed in two Nos. envelops separately.

It is requested that the same may please be verified that whether the currency are fair or otherwise, so to proceed further in the matter.

Matter most urgent please.

Police Training College Hangu.

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Attested The Hol



STATE BANK OF PAKISTAN BANKING SERVICES CORPORATION PESHAWAR

ISSUE/CLAIM UNIT 091-9211962-63

110 W

(by)

Form L-57

No. CLPF.158/2022- 1698/

Dated 11/03/2012

Commandant

Police Training College Hangu

The note(s) described below received from Model Police Station PTC, District Hangu vide Report No. 103 dated 06/03/2022 are FORGED.

Denomination.	No. of Note	Piece	Value Rs.	Decision
1000	List Attached	23	23,000/-	FORGED

ORIGINALLY EXAMINED BY

Assistant Currency Officer

Jawaysmano

Sr. Assistant Currency Officer

Currency Officer

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MOBILE SCANNER

(29)

Attested FD

ISSUE/CLAIM UNIT 091-9211962-63



STATE BANK OF PAKISTAN BANKING SERVICES CORPORATION PESHAWAR

Form No.L-58. {See Para 367(a)}

List of Forged Note(s) presented at the Issue Department, State Bank of Pakistan BSC Peshawar for examination by the Model Police Station PTC, District Hangu.

etter No. and Date Case Details	Date of Presentation	Alleged No. of note(s)	' Value	Remarks
No. 111/PO Dated 08/03/2022 Vide Report No. 103 dated 06/03/2022	09/03/2022	List Attached	Rs. 23,000/-	The note(s) in question is/are forwarded herewith for usual enquiry. It/They may be returned to this office with a copy of the final police report/Court Decision when done with an acknowledgement is requested. N.B.—It is most important that the officer(s) into whose hauds the note(s) may go for enquiry should handle it/them with great care and guard against it/their loss.

State Bank of Pakistan Issue Department Peshawar

Commandant Police Training Coilege Hangu

For favor of investigation & report.

(Chrreity Officer

Attested

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	FR- Number	Processing /	Denom	Receiving Office	5erial	Intial Remarks
A COL		Receive Date	1000	PSH	WW4809524	Orient(Suspect)
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2 1	FR/2021-22/FSH/00148	20220309		PSH	WW4809532	Orient(Suspect)
3	FR/2021-22/PSH/00148	20220309	1000	PSH	WW4809913	Orient(Suspect)
4-1	FR/2021-22/PSH/00148	20220309	1000	PSH	WW4809813	Orient(Suspect)
	FR/2021-22/PSH/00148	20220309	1000	PSH	WW4809816	Orient(Suspect)
	FR/2021-22/PSH/00148	20220309	1000	PSH	WW4809818	Orient(Suspect)
7	FR/2021-22/PSH/00148	20220309	1000	PSH	WW4809871	Orient(Suspect)
- =	FR/2021-22/PSH/00148	20220309	1000	PSH	WW4809824	Orient(Suspect)
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11	FR/2021-22/PSH/00148	20220309	1000	PSH	WW4809918	Orient(Suspect)
	FR/2021-22/PSH/00148	20220309	1000	PSH	WW4809935	Orient(Suspect)
12 13	FR/2021-22/PSH/00148	20220309	1000		WW4809937	Orient(Suspect)
14	FR/2021-22/PSH/00148	20220309	1000	PSH	WW4809948	Orient(Suspect)
15	FR/2021-22/PSH/00148	20226309	1000	PSH	WW4809950	Orient(Suspect)
	FR/2021-22/PSH/00148	20220309	1000	PSH_	WW4809958	Orient(Suspect)
16	FR/2021-22/PSH/00148	20220309	1000	PSH_	WW4810241	Orient(Suspect)
17	FR/2021-22/PSH/00148	20220309	1000	PSH	WW4810245	Orient(Suspect)
18	FR/2021-22/PSH/00148	20220309	1000		WW4810260	Orient(Suspect)
19	FR/2021-22/PSH/00148	20220309	1000		WW4809952	Orient(Suspect)
2.0	FR/2021-22/PSH/00148	20220309	1000		WW4809845	Orient(Suspect)
7;1	FR/20Z1-22/PSH/00148	20220309	1000		WW4809845	Orient(Suspect)
22 23	FR/2021-22/PSH/00148	20220309	1000	PSH	VVV4603927	1

Attested State

Dated 06 / 021

PA/CH Sheet-2021-22

CHARGE SHEET

- I) I, Aman Ullah Khan, SP FRP Kohat as competent authority, am of the opinion that you Recruit Constable Naeem Gul No. 5451/FRP, have committed the following acts/omission as defined in Rule 2 (iii) of Police Rules 1975.
 - (a) That as reported vide Deputy Commandant PTC Hangu Order Endst No. 57-59/PA dated 31:03:2022, on 06:03:2022, ASI Iqrar Khan, recovery mess manager general mess, registered report vide DD No. 103 dated 06:03:2022 against you that you tried to pay Rs. 1000/1000 (20 notes of thousand) forged currency as mess dues. For that allegations, you have been returned as unqualified vide: above quoted reference. Thus you have committed a gross "Misconduct" as defined in Rule 2 (iii) of Police Rules 1975".
- II). You are, therefore, required to submit your written reply within 07 days of the receipt of this charge sheet to the Enquiry Officer.
- III). Your written reply, if any, should reach the Enquiry Officer within specific period, failing which it shall be presumed that you have no defense to offer and in case, ex-parte action shall follow against you.

Attested 97

IV). Intimate as to whether you desire to be heard in person or not?

V) A statement of allegation is enclosed.

St

SUPERINTENDENT OF POLICE, FRE

@KOHAT RANGE, KOHAT

: 86 JOH FRP CB. h. 5385 1900 CHE 18 CONSON "E" 5 مع وز فيدمن بيون كه فورا 200 200 كو السبق لوليو دولوق سه والبس الر ا بنا اسله المونيس فوى في عَع دان كي - قوق بند بالأكي - بعش وي الله على والبس ريخ ارك آكر دركها كو را قبران بالا على بو في في و في الله على بو في في الله على الله على بو في الله على الله على بو في الله على الل ولوف كر العراق لول كرار المراف وي والا أو المراف وي والا أور المراب المراب المراب اور على كالمركى كالله على كالله المرك المرك على على على المرك المروسلم كاون عمد مور كوارم الارق سرواء - أسى دوران في ورالهم لكارا كلي - كم آب في - là (milita pho de 3 de 160 - 4000 00 1/3/ 200 000 ap do نائيم کون . جس بر وس نے فرکورہ معملے سے کولئ طام ک رَ الْمُونُ امْنَانُ وَالْكُونَ مِنْ مَا يُونُ مِنْ مِنْ اللَّهِ الْمُعَالِمُ اللَّهِ الْمِنْ اللَّهِ الْمِنْ اللَّهِ اللللَّهِ الللَّهِ اللللَّهِ اللللَّهِ الللَّهِ الللللَّهِ الللَّهِ الللَّهِ الللَّهِ اللللللَّم المرد لعدار فور مدة اله كو من ساكي كو دوران كارد علم انهان رالا دالا 6 c/lode 201 wellow illo & 01 -04 203/3 - 50 P.T.C & Jimis Ilal - WW also Cold FRP Now illy - U SIRIO OF CLOS OU FRP ME IS COUNTY OF THE عبرا كعلى أب عرب كوراف سي - اور س بوليس حيد طريق ولمه وي بناب فوش المهل مع دوی سراغام د ای دای فالی کانان کی لفالی کویا عول اور میں اس قسم نے فعل کے مقانی سوج کی نہیں سانا۔ اولیں جمیع العرن علم العرن الله الم الم الم الم الم الم الله الم الله الم الله المول المو را من الم المن المر و المن المرة الما المن المرة الما المنها Jes + 191- 26 41 de clais of con recip of 265 30) CMC=14301-7385201-Arkestock The State of the Stat Mob = 0330.5176326

تناسب عالى: _

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Alexed W

ر پورٹ بقلمدروز ناھے ہمراہ اف انگوائزی ہے۔ جبکہ انگوائزی PTC ہنا وی فائنڈ نگ رپورٹ ہیں اس بات کی واضح تصدیق ہو چکی ہے کہ بخور لیارنمبر 111/PO مورجہ 08.03.2022 کرنسی اسٹیٹ بنگ آف یا کہ نتاان جیجوائے جنگی نسبت جعلی ہونے کی رائے موصول ہو کی کیٹرفو ٹو گالی

الما کی دوران انکوائری تھوں جوت اور شہاؤت کی روشی میں من DSP استیج پر پہنچا ہوں کو تبل ازیں انکوائری آ نسر PTC ہنگو نے دوران انکوائری تھوں جوت اور شہاؤت کی روشی میں ریکروٹس کا مسلط ان نعیم کل نمبر 5385 اور حسن وحید نمبر 5385 کو گنا ہگار تھیر ایا ہے اندریں بازہ انکوائری کرتے ہوئے میں بھی اس نہنچ پر پہنچا ہوں کہ حالات وواقعات اور بیانات کی روشنی میں ہر دو فہ کورہ بالا ریکروٹس کا نسمیلا ان گنا ہگاڑ پائے جانے ہیں ان کی ابتداء میں بی ایسی حرکا ت میں کہلے ایک بدنما دائے ہے۔ مستقبل میں ایک انجھے پولیس آ فسر ثابت نہیں ہو سکتے بدیں وجد انکوائری بندا میں دونوں ریکروٹس کا نسمیلا ان کو سکتے بدیں وجد انکوائری بندا میں دونوں ریکروٹس کا نسمیلا ان کو سکتے بدیں وجد انکوائری بندا میں دونوں ریکروٹس کا نسمیلا ان کو سکتے بدیں وجد انکوائری بندا میں دونوں ریکروٹس کا نسمیلا کو سکتے بدیں وجد انکوائری بندا میں دونوں ریکروٹس کا نسمیلا کو سکتے بدیں وجد انکوائری بندا میں دونوں ریکروٹس کا نسمیلا کو سکتے بدیں وجد انکوائری بندا میں دونوں ریکروٹس کا نسمیلا کو سکتے بدیں وجد انکوائری بندا میں دونوں ریکروٹس کا نسمیلا کو سکتے بدیں وجد انکوائری بندا میں دونوں ریکروٹس کا نسمیلا کو سکتے بدیں وجد انکوائری بندا میں دونوں ریکروٹس کا دوئوں کے دوئوں کو سکتے بدیں وجد انکوائری بندا میں دونوں کی جاتی ہے۔

انگوائری رپورٹ مرنب ہوکر گذارش خدمت ہے۔

(E.O) اسرمحودخان (E.O)

وَى الين في FRP كوهات رين كوهات

Attested (1)

"G"

final show cause notice

PAPSCN - 2021-22

That as reported vide Deputy Commandant PTC Hangu Order Endst: No 57-59/PA dated 31.03.2022, you Recruit Constable Hassan Waheed No. 5385/FRP, on 06.03.2022, have received the forged currency notes from Recruit Constable Naeem Gul No. 5451 and Enquiry Officer in above quoted reference recovered Rs. 3000/- as forged currency from you. For that allegations, you have been unqualified vide above quoted reference too.

Accordingly, charge sheet No. 181/PA dated 06.04.2022 and proper departmental enquiry was conducted by DSP FRP Kohat, who, in his finding, found guilty of the charges leveled against you.

NOW, THEREFORE, I, Superintendent of Police, FRP Kohat Range, Kohat in exercise of the powers vested in me under the Khyber Pakhtunkhwa Police Rules – 1975 hereby call upon you Recruit Constable Hassan Waheed No. 5385/FRP, through this Final Show Cause Notice to explain your position within 07 days of the receipt of this notice as to why you should not be awarded one or more Major or Minor Funishment as mentioned in Rule (4) of KP Police Rules 1975. In case of non receipt of reply within the stipulated period, an ex-parte action will be taken against you. Also state in writing as to whether you desire to be heard in person or not. Copy of finding report of Enquiry Officer is enclosed herewith.

Addited

No. $\frac{231}{1000}$ /PA

____/2022

11/202

Superintendent of Police, FRP EKohat Range Kohat

(61

365 00 FRP into 5385 pp 000 July 1667 UST US 1-dectp معروهن غيرن كم مون كلين كالم تون المويل لوليو دُولي عا والبين الر ابنا العلو الميونتين ون من عن دانه الله وي من إلى الله على وج مِن والبس الرين بارك أكر حرفها ثو اضران بال عج يوت تقد . قد مع بو بي كه كه و لغير عظے تعیر فارد کوار کارڈ میں ڈالا گیا۔ اور مہری الماری اور کے کی لائن لی گئے۔ الرازفان الله و وقع ، عسل في كون علم عى نبس تفا- اور في عام المر الله علم عام المر الله علم عالم المر الله علم ينكو عمله د همليان د م يا تفا- كه آب جوالزام به - اُسك تا سركري . جي الم من في مركون معلم على عد في لكن اللا مرك CATA IS TO COP I Show to chang plied doing the Pic al المحرف المحال من من على وين مان الوربارة كارز كارز المرق ألاران بال 6, 16,66,10 de / Sto colo e 3/6/3/5 01 TE DO 1/3 - 5/1/3 Si PTC 2 JE willed - Will it is out of the ART - 6 0/24 00 665 00 PRP M 2 25 کیداز حوال کی ایم او کاران کاران و دول کاران و زوران کاری ایم ایم کارونی - E & JO JUST OF JOHN CHAIL ETEN إلى كون رك فرسي كوراف ع عداور مين لورس جي با فرات فيمه من يا الم فرش الهوي مي دُولو مرا في م د اي دلي فلين المال ك كفا ال كريليون اور سی اس شم کے معل کے وظل معرفا ہیں جیس مکنا۔ دولیوں جی با الزار في كرون على عود مورا العري روازان به وه سراس في و ورون اوري - (by 2 1) 1 pd - e & 3 25 (by 2 pl - e) sie مر من سائل تو الفاق دارام عاليات Attasted Du 90 $17 \frac{05}{2022}$

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بيان ازال ربلون كانسيل لعيم ال مطعيني FRP لان لويان -تعروز عُرص عول كم الوركر م رود في الورار كارد مي وال كني- اور من العارى الع بلى كى الأشى لى لئى- عدائى الم وى ممنوع سى الم المن يونى- اور مسلى 5ردن كى سى كوارفر كارد بين ريا- إسى دران نَا إِلَمُ الرَّامُ وَكَا لِي - كَمْ أَنِ فَي جَعَلَ رَسَى فيسَ فَيْجِمِ اقْرَارَ فَانَ اوَ (a) Jos pit Pitic 3. 11 - les univer de cos de land - le cos de 10 /3 (10 - 10) 1 (10) - en (10) 20 / (10) - lis & 0-3 مع مذوره معلى عديد كعلى المام لا. Wy () Chil op it is 316 16 2 19 30 Mid de con plie dois fin P.T.C red of Confirm, Har of 31 03 200 in the fact of the o رُوروباره كوارير كارو بكلي إنسان بالا دالا سي- بجر وراكي مدوره المان بالا دالا سي- بجر وراكي مدوره ا كوادم كارد سى واليس تقال مر جله والي كا ورائي كا ورائي و المريم لائن الوهان روانه له له العراز بن سال و p.T.c في طير تس رو - Santo on Clas will FRP red S. مرا لعلی ری غروب گوانے سے ہے۔ اور دی ہولیں جی اینزی فلہ من فيادي فوش المحوى سے ذول سرافام رے اور ان قاص فالان کی کنالی کرانے ہیں۔ اور میں اس قسم کو قبل کے منطق سو آج کی فين سانا- بولين عيد الاران علم كا برناى يو- مير ع اوبر بح الموام ي وه سراسر فیون بر سنی به بنیادی ایر فی برازی این ای by cite is of the confection of being the عائد - اور جارشی داخل رفعر کی بالا-CNIC 1 14301-1421469-9 0336-7986861

سان تباك مرتزياً أبك ماه بها الخون ليول فاوسي دره آدم حل تبا ها كي ال وطن مران الا هم معلق واحدة في صفى ولي في كاشهرا اور ديوال والما والراب كادر ول معمال المالية الم 1 0332-974731 / Egil - 1051 / Berling PIC - Ling of 6 000 / 23000 / 5 رُطِ اور ١٥٠٥ والي الرمورد مرور 6 وقت 20:50 ع من المان المراح والي الرمورد مرور 6 وقت 30:50 ع من المان المراح و 1-212 Elles 1000 Wills 21 320 E = 20001. وي رقم مل مركز م ندم على و ده الله مركز ل مع دار من من الله 15 A A - 1 5385 23 00 0332 9727732 14301-7385201-5 CAVIC# Hillester 20

2/ 8:22116 ties 6/32 por 6/20 mg - - Asi Visit 103 N الميراز نين عهم ينكو جزل مي وفكر فوري م ديكوري من معرز عا كم فرد 1110 ع برا فطر کرنی لائے میں رہی سید ارکیکی جس ویٹ کے جدور صبی برے کا شہ مول لاؤہ فيما ع يوى كرره كرن ورى يرحوني يونا كاشريح لهذا أب مام كرم وردى يدي ي وسركره من مزمر والمعداد كرنى وزكر وسي كيد جوه رفع جوي سويم المرود والمؤرة كريدا المريد المريد و المريد و المريد عا حکره آزان در منه ولی که مداره واری را دان ار دان از دان در 24 gt A people i be of the 1/5382/ 400 co of of Us 1000/1000 cois WW4808132 BUW4809127 ONW 4809824 OG - 4)=1/4 6 4 6 / On 10 82 WW 48078 21 @ WW4807818 @ WW4809816 @WW480983-62W4980913 6 @ww480896 @ ww486986@ ww4864824 6 100770 GWG 4808758 BWG 4808750 BWG 808748 BWG 80979 37 B WW 4809138 B WWW. HORANS رستان ما المران الأكراب من المران الم عالم تعنى طلب في فيز اليوس ول الأول الكوال ا The had the wind I who also blow 1861/E of الله المع المراد المراد

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(31) COPA LE DIE DI ME DE D'ONDOU E 11-5382 12 June Cuo co 6,23 en le Ventre @ 73 Mr WW 48099276) WW 48099650 WW 4809952 الروس الدارس الدارس المراساري فان الله عروت ور العام وال 1850 4 (16/1/2) 2/2 July 2/1/6/1000 Elecy 3/16/00 The of the Cong WEIR String 13 Complete a- Curio a- Croisip 430/4/29610 while Die Me Chiliplin GCD was in the property of the property of the Continues of مروي ور ماها وي س كري زر مومز رمرك و شيط بغر آوره ندي. _ Cuns LA LAST Allested as

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عبال ک کے مربے اور فور عالم کے روسرد اور افان ایم عاطیق 1 1255 He Style of 160 84 5451 F له والارت المدرون موس وي ادارة على الراد على الماهي وعلى سرني ما مسرسال الرقيدي الكرومي المعرومي الم الرزبي لوي م المد لافسيد على أني بين ترب عن المرفع المراكم الله preventes Sant vice 50 ى مى يود كا سىد كار دار رو كري ال المورد العرب WW 4809528000 E 6 5 2 2 20 9 5 6 69 WW 4809113@ WW 4809532@ WW 4809527@ War 49 04818 @ WW 4809813 @ WW 4809813 D WW4809916@ WW4869826@ WW4809891@ 1004809935 (D) WILL 4809918 (D) WIEGE 69910 (D) 60486995000 WW4803948 DWW.809927.Q. 1014812245 00 COWFE TERLIT @ WILL 48=935800 130 26 L 11 2 2 10 2 18 18 1849 81 0260 (39) 10 40 5 101 Chilles what Chi Estevier وتوكي ومركز لعدهورى والمفكر كالمكالم وسأكرك وويرقوصه وري 2 25 B

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

VERSUS

Commandant FRP, Khyber Pakhtunkhwa, Peshawar & other......Respondents.

AUTHORITY LETTER

Respectfully Sheweth:-

We respondents No. 2 & 3 do hereby solemnly authorize Mr. Ghassan Ullah ASI FRP HQrs; to attend the Honorable Tribunal and submit affidavit/Para-wise comments required for the defense of above Service Appeal on our behalf.

Superintendent of Police, FRP

Kohat Range, Kohat (Respondent No. 02) **Asad Mehmood** (Incumbent) Commandant FRP, K hyber Pakhtunkhwa, Peshawar (Respondent No. 03) Syed Ashfaq Anwar (PSP)

(Incumbent)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1854/2023.	
Hassan Waheed Ex-Recruit Constable No. 538	5 R/O Bahadar Colony Near D.C Officer Pindi
Road Kohat	Appellant

VERSUS

Commandant FRP, Khyber Pakhtunkhwa, Peshawar & other......Respondents.

<u>AFFIDAVIT</u>

I respondent No. 02 (Asad Mehmood) do hereby solemnly affirm and declare on oath that the contents of a accompanying application for restoration of right of submission of Para-wise comments on behalf of respondent department are correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court

Superintendent of Folice FRP Kohat Range, Kohat Asad mehmood (Respondent No.2) Incumbent

