



Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1102/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/07/2022	<p>The appeal of Mr. Behramand resubmitted today by Mr. Fawad Jan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-		<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>27-7-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Behramand son of Mukhtiar Khan Constable no. 1047/FRP Charsadda received today i.e. on 30.06.2022 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 3- Page nos. 31 & 35 of the appeal are illegible which may be replaced by legible/better one.

No. 7131 /S.T,

Dt. 1-7- /2022


REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Dr. Fawad Jan Adv.
High Court Pesh.

Departmental appeal is attached as annexure 9
on page 34.
Page Nos 31 & 35 are reproduced and attached.
Fawad

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title:

Behramand vs Govt

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:	✓	
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?		✓
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:

Dr. Fayaz Jan Adu

Signature:

[Signature]

Dated:

5/6/22

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No. 1102 /2022

Behramand

.....Appellant

Versus

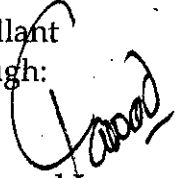
Government of KPK, & Others

..... Respondents

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Appellant
Through:


Dr. Fawad Jan
Advocates, Peshawar
0314-9828818

Dated:28.06.2022

1

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No. 1102 /2022

Behramand S/O Mukhtiar Khan, (Constable Belt No.1047 FRP)
R/O Dosehra Road, Pakistan Keley, Tehsil & District Charsadda.
.....Appellant

Versus

1. **Government of KPK, through, Chief Secretary Khyber Pakhtunkhwa, Peshawar.**
2. **Additional Inspector General of Police, Head Quarters, Khyber Pakhtunkhwa, Peshawar**
3. **Commandant, Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.**
4. **Deputy Commandant, Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.**

.....Respondents

**APPEAL U/S-4 OF THE KHYBER PAKHTOONKHW
TRIBUNAL ACT 1974 AGAINST THE IMPUGNED
ORDER DATED: 03.02.2022 OF THE DEPUTY
COMMANDANT FRONTIER RESERVE POLICE,
KPK, PESHAWAR (RESPONDENTS NO.4),
WHEREBY PENALTY OF RECOVERY FROM SALARY
WAS IMPOSED ON APPELLANT AND THE
IMPUGNED ORDER DATED: 01.03.2022 PASSED BY
THE COMMANDANT FRONTIER RESERVE POLICE,
KPK, PESHAWAR (RESPONDENT NO.3) VIDE
WHICH THE APPEAL OF APPELLANT WAS
REJECTED AND IMPUGNED ORDER DATED
02.06.2022 OF THE ADDITIONAL INSPECTOR
GENERAL OF POLICE KHYBER PAKHTOONKHW**

(RESPONDENT NO. 2), VIDE WHICH THE REVISION PETITION OF APPELLANT FILED UNDER 11-A OF POLICE RULES 1975 (AMENDED 2014) WAS REJECTED AND THE ORDERS OF RESPONDENT NO. 3 & 4 WAS MAINTAINED. COPIES OF ALL THE THREE ORDERS ARE ENCLOSED AS ANNEXURE A, A-1 AND A-2 RESPECTIVELY.

PRAYER IN APPEAL:

ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED ORDER DATED: 02.06.2022 OF THE RESPONDENTS NO.2 MAY KINDLY BE SET-ASIDE AND THE APPEAL OF THE APPELLANT MAY KINDLY BE ALLOWED AGAINST THE IMPUGNED ORDERS OF RESPONDENT NO.2 DATED: 01.03.2022 AND OF RESPONDENT NO.3 DATED: 03.02.2022 MAY PLEASE BE SET-ASIDE, AND THE RECOVERIES MADE ON THE GARB OF THE IMPUGNED ORDERS MAY KINDLY BE RESTORED.

Respectfully Sheweth:

Facts:-

Appellant most humbly submits as under:

1. That the Appellant is serving as Constable Belt Number 1047, in the Frontier Reserve Police Khyber Pakhtunkhwa, Peshawar.
2. That the Appellant performing his job as constable in the Frontier Reserve Police Khyber Pakhtunkhwa, Peshawar, the appellant is punctual / regular in his duties and no complaint against the appellant.
3. That the appellant was deputed by the then high ups for performing duties with the Ex-Commissioner Khalid Khan Umerzai as a Gunner since in the year 2017.

4. That after the reporting to the Ex-commissioner, the Ex-commissioner deputed the appellant to perform his duties with the Ex-commissioner Son who is on duty as Deputy Director Dr. Fahad Khalid Independent Monitoring Unit, Health Department from the day of report who's reside at Banglow No. G - 6 Old Jamroud Road, Peshawar. **{Copy of Duty Performance Certificate is attached as Annexure "B"}**
5. That the appellant performs his duties punctual / regular basis without any hesitation but in the year 2021, family dispute was arisen between the father and son. The Ex-commissioner Called to the appellant to report FRP Head Quarters Peshawar on 30.09.2021, where the appellant come to know that the Ex-Commissioner close his duties. The appellant approach to the Ex-Commissioner, the Ex-Commissioner asked the official Number of the respondent No. 4 for correction that the appellant was on duty with his own son. **{Copy of call details, Daily Diary Report, Massages and Snap Shots are attached as Annexure "C" "C - 1", "C - 2" & "C - 3"}**
6. That it is pertinent to mention here that during performing his duties the applicant became sick and was advised bed rest for a week by the Service Hospital Peshawar. The applicant filed application for leave in account of bed rest advised by the doctor before the competent authority. **{Copy of OPD Slip and application is attached as Annexure - "D"}**
- 7.
8. That thereafter, a charge sheet was issued to the appellant and fact findings inquiry order were issued by the Deputy Commandant FRP and nominated DSP FRP, HQRs: Peshawar for probing the matter. After completing the inquiry, an inquiry report was produced before the Respondent No. 4. During the course of enquiry, the appellant appeared before the enquiry officer and record his statement. **{Copy of Charge Sheet & Statement are attached as Annexure "E" & "E - 1"}**
9. That thereafter a Final show cause notice was issued to the Appellant on 02/12/2021 and reply

of the same was submitted to the competent authority. {Copy of Show Cause and Reply are Annexure "F"}

10. That the respondent No.4, without informing and awarding personal hearing to appellant, without any plausible reasons awarded the major punishment of deduction in pay vide impugned Order No.271-75/PA dated. 03.02.2022, which have no concern with the reality, and against law and the appellant was kept in dark that the proceedings are in process against all the official. {Copy of impugned Order is attached as annexure - "A"}
11. That feeling aggrieved from the impugned orders of respondent No. 4, the appellant filed appeal before the Respondent No. 3 but the same was rejected on 01.03.2022. {Copy of Appeal and impugned Order are attached as annexure - "G" & "A-1"}
12. That the appellant filed revision petition under rule 11 -A of the Police Rules 1975 before the respondent No. 2 against the orders of the respondent No. 3 and 4 which was turn down on 02.06.2022 and the orders of respondent No. 3 & 4 was maintained and the revision petition of the appellant was rejected.
{Copy of the revision and order are attached as Annexure- "H" & "A-2"}.
13. That feeling aggrieved from the impugned orders of respondent No. 4, 3 & 2 preferring this service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

GROUND:

- A. That the impugned orders of Respondents No.2, 3 and 4 dated 02.06.2022, 01.03.2022 and 03.02.2022 is against law, facts and material on record, hence liable to be set-aside.
- B. That the impugned orders of awarding major punishment to the Appellant have been passed on political influence. It is evident from the impugned order which is violation of

rules and legal provision and the authority did not used his mind independently but impugned orders have been passed on mala fide intention.

- C. That the impugned orders are issued without giving any opportunity of hearing to appellant and passed the impugned orders without fulfilling the legal requirements and passed the impugned orders in slipshod manner, such practice adversely effects efficiency of incumbents and also reduces their confidence and faith in public.
- D. That the Appellant per policy of civil servant should be given an opportunity of hearing and the same has not been done, which seems to be injustice with Appellant.
- E. That the appellant belongs to very poor family and according to civil servant laws and impugned orders without fulfilling the legal requirements is nullity in the eye of law and also against all norms of natural justice.
- F. That the impugned Orders dated. 02.06.2022, 01.03.2022 and 03.02.2022 is totally based on political influence and mala fide intentions are illegal, malafide, without jurisdiction and without lawful authority, therefore, are liable to be set-aside.
- G. That the order of the Respondent No.2, 3 & 5 suffers from legal and factual infirmities and mis-application of law as laid down by the August Supreme Court of Pakistan in subject.

IT IS, THEREFORE, RESPECTIVELY PRAYED THAT ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED ORDER DATED: 02.06.2022 OF THE RESPONDENTS NO.2 MAY KINDLY BE SET-ASIDE AND THE APPEAL OF THE APPELLANT MAY KINDLY BE ALLOWED AGAINST THE IMPUGNED ORDERS OF RESPONDENT NO.2 DATED: 01.03.2022 AND

6

OF RESPONDENT NO.3 DATED: 03.02.2022
MAY PLEASE BE SET-ASIDE, AND THE
RECOVERIES MADE ON THE GARB OF THE
IMPUGNED ORDERS MAY KINDLY BE
RESTORED.

Appellant
Through: *Fawad* *Baker*
Dr. Fawad Jan
Advocate, Peshawar

Dated: 28.06.2022

VERIFICATION:

It is verified that (as per information given me by my client) all the contents of the instant appeal are true and correct and nothing has been concealed intentionally from this Hon'ble Tribunal.

Fawad
Advocate

Note:

That no such like petition / Appeal on this subject matter has earlier been filed before this Hon'ble Tribunal.

Fawad
Advocate

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No. _____/2022

Behramand
.....Appellant

Versus

Government of KPK, & Others
..... Respondents

Affidavit

It is hereby solemnly affirm and declare on oath that all the contents of the instant appeal are true and correct to the best of my Knowledge and belief and nothing has been concealed intentionally from this Honourable Court.



Deponent
Behramand
17101-4939278-9
0347-9825341

BEFORE THE SERVICE TRIBUNAL K.P.K.
PESHAWAR

Service Appeal No. _____/2022

Behramand

.....Appellant

Versus

Government of KPK, & Others

..... Respondents

**APPLICATION FOR SUSPENSION OF THE
OPERATION OF THE IMPUGNED ORDER
DATED: 02.06.2022 AND MAINTAIN
STATUS QUO TILL THE FINAL DISPOSAL
OF THE MAIN APPEAL.**

Respectfully Sheweth,

1. That the memo of appeal is filed before this Hon'ble Court in which no date of hearing has yet been fixed. It is submitted that at the time of disposal this application the contents of accompanying memo appeal may be considered as integral part of this application.
2. That apparently the petitioner has got strong competent and legal case in his favor and the petitioner is sanguine in respect of his success moreover the contents of the main appeal and its supporting documents/annexure connect prima-facie case in favor of present applicant.
3. That if the operation of the impugned order is not suspended and status quo is not ordered the respondent who is about to relive the present and by this way the accompanying memo would become in fructuous and

the petitioner would be inconvenienced and the petitioner would suffer irreparable loss.

It is, therefore most humbly prayed that on acceptance of this application for of the operation of the impugned order dated: 02.06.2022 may kindly be suspended and maintaining status quo till the final disposal of the main appeal.

Behramand

Appellant
Through
Dr. Fawad Jan *Fawad*
Advocate, Peshawar

Dated: 28.06.2022

Affidavit

It is hereby solemnly affirmed and declare on oath that all the contents of the instant appeal are true and correct to the best of my Knowledge and belief and nothing has been concealed intentionally from this Honourable Court.

Behramand

Deponent

Behramand

1710-4939278-9

0347-9825341

ORDER Annex - "A" (10)

This order will dispose of the Departmental Inquiry against Constable Behramand No.1047 of FRP/HQrs: Peshawar.

Brief facts of the case are that constable Behramand No. 1047 of FRP HQrs was deployed as gunner with Ex-Commissioner Khalid Khan Umerzai dt; 20-12-2017 but was returned to FRP HQrs on the same day. But failed to report at FRP HQrs and deliberately absented from lawful duties. without taking any leave/permission of the Competent Authority. In this regard, preliminary inquiry was entrusted through DSP FRP HQrs wherein the said constable in his written reply submitted that Ex-Commissioner Khalid Khan has directed me to perform duty with his son Director Health IMU and he was serving with the said Director. The IO added that the said constable should inform his High-up's regarding his duties with his son, but he failed to do so and had performed his duties at his own will. In this regard formal departmental proceedings were initiated and he was issued Charge Sheet alongwith Statement of allegations and RI FRP HQrs Peshawar was nominated as Inquiry Officer. After detail inquiry, the Inquiry Officer submitted his findings wherein he reported that the said constable has performed his duties with the son of Ex-Commissioner Khalid Khan without bringing the matter in to the notice of his High Ups and further recommended for suitable punishment. Upon the finding of Inquiry Officer, he was issued Final Show Cause Notice, to which he replied but found unsatisfactory.

Later on the said constable has given an ample opportunity of personal hearing in OR but he failed to satisfy the undersigned.

Keeping in view the recommendations of both the inquiry Officers, it has come clear crystal that the defaulter constable has performed his duties with his own will and he is not entitle for the pay of the period which he served with Director Health IMU without approval of the competent authority. Therefore his period with effect from 20-12-2017 to 20.10.2021 for the period of 03 years and 10 months is hereby treated as without pay along with stern warning to be careful in future. His pay released.

[Signature]
Deputy Commandant,
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar

OB 149
3-2-2022

No. 271-75 /PA dated Peshawar, the 03/02/2022.
Copy to the:-

1. Worthy Commandant, FRP Khyber Pakhtunkhwa Peshawar for information please.
2. Accountant /FRP/HQrs: Peshawar.
3. SRC/OASI/FMC FRP HQrs: Peshawar

2638
In R/O
Comdt
FRP

Dear Masud Sir,
if u could kindly take regard
Lenient u.

PESHAWAR
[Signature]
PSP (Ex-14)
22/2/2022

ORDER

This order will dispose of the departmental appeal preferred by constable Behramand No. 1047 of FRP HQrs, against the order of Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar issued vide Order Endst. No. 271-75/PA, dated 03.02.2022, wherein the period of 03 years and 10 months was treated as leave without pay. The applicant was proceeded against on the allegations that he was deployed as gunner with Ex-commissioner Khalid Khan Umarzai, on 20.12.2017 and was returned with the direction to report arrival at FRP HQrs, on the same day, but he failed to report at FRP HQrs, deliberately absented himself from lawful duty, without taking any leave or prior permission of the competent authority.

In this regard, preliminary enquiry was entrusted through DSP FRP HQrs, wherein the said constable in his written reply submitted that Ex-commissioner Khalid Khan has directed me to perform duty with his son Director Health IMU and he was performing his duty with the said Director. The Enquiry Officer added that the said constable should inform his High-ups regarding his duties with his son, but he failed to do so and had performed his duties at his own will.

In this regard formal departmental proceedings were initiated against him as he was issued Charge Sheet alongwith Statement of Allegations and RI FRP HQrs; was nominated as Enquiry Officer to unearth the actual facts. After completion of enquiry, the Enquiry Officer submitted his finding report, wherein he reported that the said constable has performed his duties with the son of Ex-commissioner Khalid Khan without bringing the matter into the notice of High-ups and recommended for suitable punishment.

Upon the finding of Enquiry Officer, he was served with Final Show Cause Notice, to which he replied, but his reply was found unsatisfactory. Later on the above named constable has given an ample opportunity of personal hearing in orderly room but he failed to satisfy the competent authority.

Keeping in view the above narrated facts and other material available on record, it has been found that the above named constable performed his duties with his own will and he is not entitled for the pay of the period which he served with Director Health IMU without approval of the competent authority, therefore his period with effect from 20.12.2017 to 20.10.2021 for total period of 03 years and 10 months was treated as without pay vide Order Endst; No. 271-75/PA, dated 03.02.2022.

Feeling aggrieved against the impugned order of Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar, the applicant preferred the instant appeal. The applicant was summoned and heard in person in Orderly Room held on 18.02.2022.

During the course of personal hearing, the applicant failed to present any justification regarding to his innocence. From perusal of enquiry file it has been found that the allegations were fully established against him during the course of enquiry. 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, I, 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/52-60/PA, dated Peshawar the 01/03/2022.

Copy of above is forwarded for information and necessary action to the:-

1. Deputy Commandant FRP, Khyber Pakhtunkhwa, Peshawar.
2. Accountant FRP HQrs; Peshawar.
3. SRC/Fauji Missal FRP HQrs; Peshawar. His service record alongwith D file sent herewith.



Annex - "A-2"

(12)

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 by **Constable Behramand No. 1047**. The petitioner was awarded punishment of without pay for the period w.e. from 20.12.2017 to 20.10.2021 (03 year & 10 months) by Deputy Commandant, FRP, Khyber Pakhtunkhwa, Peshawar vide order Endst: No. 271-75/PA, dated 03.02.2022 on the allegations that he was deployed as gunner with Ex-Commissioner Khalid Khan umerzai dated 20.12.2017 but was returned to FRP HQrs; on the same day. But he failed to report at FRP HQrs; and deliberately absented from lawful duty. In preliminary enquiry he submitted reply that Ex-Commissioner Khalid Khan has directed him to perform duty with his son Director Health IMU and he was serving with the said Director. His appeal was rejected by Commandant, FRP, Khyber Pakhtunkhwa, Peshawar vide order Endst: No. 152-60/PA, dated 01.03.2022.

Meeting of Appellate Board was held on 19.05.2022 wherein petitioner was heard in person. Petitioner contended that he was not absent but he was performing duty with son of Ex-Commissioner Khalid Khan.

Petitioner failed to submit any cogent reason in his self defense. The petitioner has performed his duties with his own will. Therefore, the Board decided that his petition is hereby rejected.

Sd/-

SABIR AHMED, PSP

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

No. S/ 1176-82/22, dated Peshawar, the 2/6 /2022.

Copy of the above is forwarded to the:

1. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar. One Service Roll and one D-file of the above named FC received vide your office Memo: No. 3482/SI Legal, dated 07.04.2022 is returned herewith for your office record.
2. Deputy Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
5. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

(DR. ZAHEER ULLAH) PSP
AIG/Establishment,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Annex - "B" (13)



INDEPENDENT MONITORING UNIT
HEALTH DEPARTMENT
GOVERNMENT OF KHYBER PAKHTUNKHWA

Dashboard: www.imuhealthkp.com
Website: www.imuhealthkp.gov.pk

House # 3, Safi Homes, Canal Road, University Town, Peshawar.

No: IMU/HD/1-5/AD 2021-22/ 89

Date: 13/10/2021

To

Deputy Commandant
FRP Police Line Headquarter
Peshawar

Subject: DUTY PERFORMANCE CERTIFICATE

Dear Sir

It is to bring into your kind notice that Constable Bahramand, Belt. No. 1047, FRP District Peshawar is performing duty till date with the undersigned.

Submitted for information, please

(Signature)
13/10/2021
Deputy Director
Independent Monitoring Unit
Health Department

FRP / HCC

نقل شد 21 روز تا 13/10/21

(6)

آدرہ اطلاع
ریورٹ غیر حافی

اعلیٰ محترم جناب خالد عثمان عسکری صاحب نے اپنے جواب میں
8599222-331 سے دفتر جناب ڈپٹی کمشنر صاحب
آپریشن کو اطلاع دی کہ کسٹیل میرہ صد 1047 سے
2017 سے تعمیرات کیا گیا تھا۔ دفتر کسٹیل کو اسی دور میں
نے واپس کر دیا تھا۔ پس آدرہ اطلاع میں جانچ کر مثال کر کے
مذکورہ کسٹیل نے واپس لائی FRP / HCC میں آدرہ حافی میں کیے
اور بحفاظتی ریکارڈ خود 2017 سے جناب کمشنر خالد عثمان
عسکری صاحب کے پاس کیا گیا تھا۔ جو رقم معاہدہ انکوائری
طلب ہے۔ لہذا رپورٹ درج روزنامہ کر کے مذکورہ کسٹیل کے خلاف
محکمہ انکوائری شروع کرنے کے مقصد سے لکھنؤ افسران بالا
صاحبان کی طرف سے ارسال کی گئی۔

ملاحظہ!

نقل بحفاظتی اہم ہے۔

Div. Forwarded P.

DSP/HCC/FRP

14/10/21

13-10-21

my stopped

DSP/acc. for enquiry
and report.

937
13/10/21

Sri
Kumar
13/10/21

Sam



LTE

62% 4:42 PM

Amrux - "C" - 1"

15



Phone



Khalid Khan Umarzai

033-185-99222

Outgoing call 09/30(Thu) 13:19
Call time 00:01:21

Profile



Call



Send SMS



Video call





Amex - 42 573 15:22 2:56 PM



Khalid Khan Um...

9331 9599222



CALL



MENU

16

9210566 malik thariq depty
commandant frp sir g.



Bahramand belt no 1047



Send



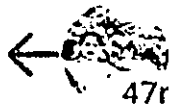
Annex - "C-3"



6:30

0.75 KB/S 4G LTE

18

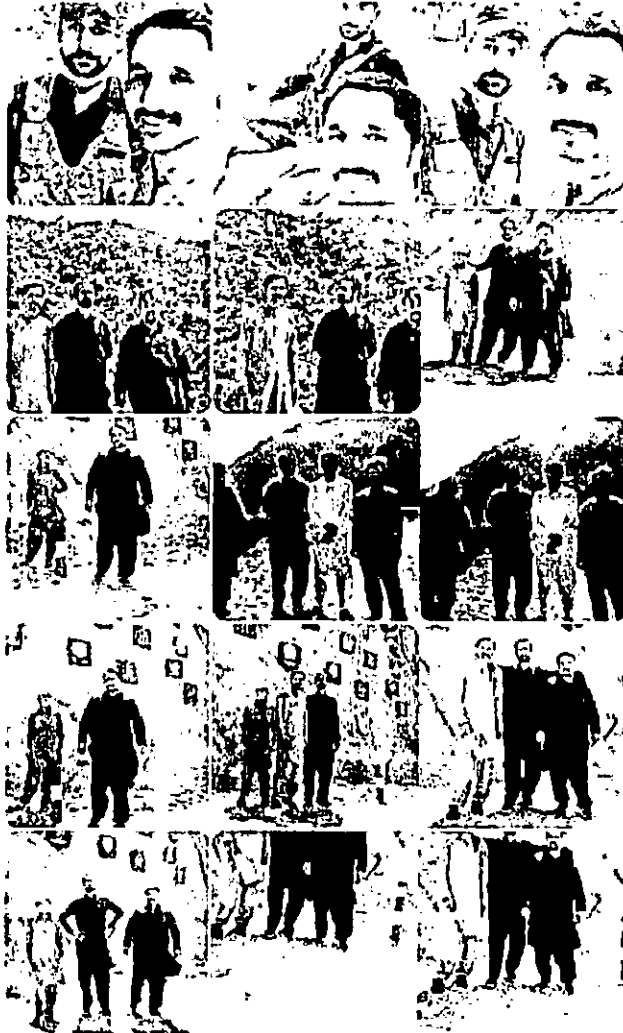


Sheraz

Active 47...



Watsap



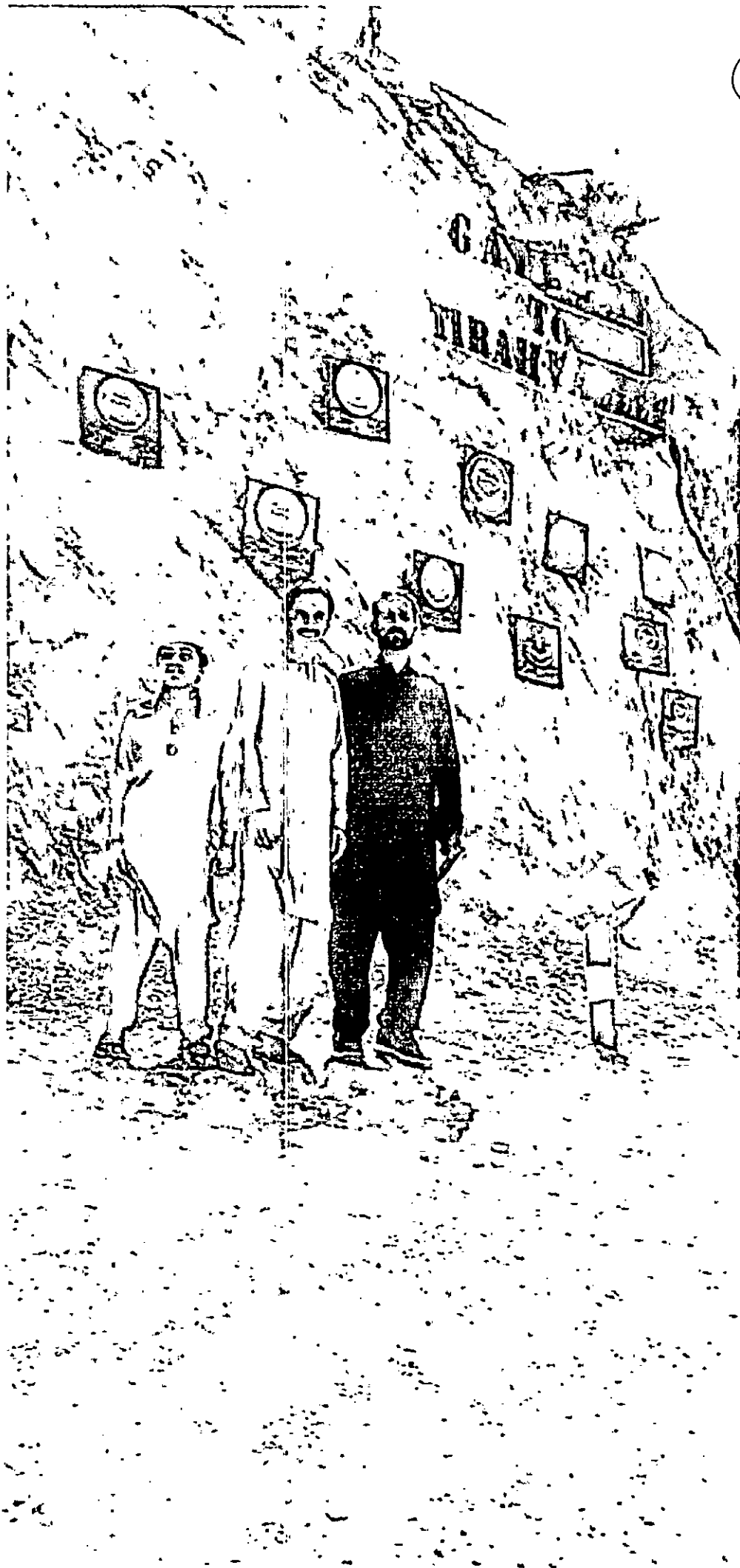
📎 📷 📎 Aa 📎 📎



61

20







LTE

25% 6:33 PM

22



7:08

4G 51%

Sikander Lala

0:07

9 photos, 2 videos

6:51 pm

23



اپنی سیکندر لالا 2021.3.12



Annet - "0" (25)

SERVICES HOSPITAL PESHAWAR
GOVERNMENT OF KPK
OPD REGISTRATION

Name BAHRAMANI Age 29 Sex MALE
Department GENERAL OPD Address PESHAWAR
Hospital Yearly No. 19543-20 Date 19-08-2020

History

RI- 1

Ob

Left eye

Clinical Examination

As above

W/O (2) P1

Provisional Diagnosis

Refractive error

Investigations

Refractive error

W/O (2) P1

*Bed Rest for 1 week
New apr 1 week*

Medical Officer
Police District
Peshawar

(Signature)

Physician
Services Hospital
Peshawar

26

833
20-8-2020

The verification report
attach herewith
submitted for order please

جی۔ اے۔ ای

گورنمنٹ ہسپتال، سہیل آباد
7.14 بجے
19/8/20

OPD slip in
respect of
Bahramand
is found correct,
hence verified

DFC for verification
and report

844
20-8-2020
FRP 1077

Allowed
Dep. Commandant
Frontier Force Police

DSP HQ
For report
Dep. Commandant
Frontier Force Police
Khan Peshawar
20-08-2020

رہنما
رہنما کے لئے
19/8/20

for forward

RI/MAST
for n/

Siv DSP/HQ/FRP
20-8-2020
Forwarded

19/8/20
FOR

19/8
Dep/HQ

Annex - "E"

27

CHARGE SHEET U/S 6(1) (A) POLICE RULES 1975

You Constable Behramand No. 1047 of FRP HQrs: Peshawar is hereby charged for committing the following omission/commissions.

As reported by LO-I FRP HQrs vide D.D No. 21 dated 13.10.2021 that You Constable Behramand No. 1047 of FRP HQrs was deployed as gunner with Ex-Commissioner Khalid Khan Umerzai in the year 2017 but was returned to FRP HQrs on the same day. But failed to report at FRP HQrs and deliberately absented from lawful duties. In this regard a preliminary inquiry was conducted, wherein you have been found guilty. For the purpose of De-novo departmental inquiry, RI FRP HQrs is hereby appointed to conduct De-novo departmental inquiry into the matter and dig out the facts into the matter.

You are hereby called upon to submit your written defense against the above charges before the enquiry officer.

Your reply should reach the Inquiry Officer within seven (7) days from date of receipt of this Charge Sheet, failing which ex-parte action shall be taken against you.

Summary of allegations is enclosed herewith.



Deputy Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar

M

بیان از میں نیٹیل بھیرنڈ 1047 FRP کے لئے
Amir

جناب عالی! ذرا سے حکم من اسٹیل حسب الکر اوتہ ان بالا صاحبان
 Ex کنندہ جناب خالد خان عمرزئی صاحب کی تو لغتاً ساتھ
 جو کہ جناب خالد خان صاحب نے مجھے حکم دیا کہ میں ان کے بیٹے
 جناب ڈاکٹر فقید خالد عمرزئی کے ساتھ ڈیوٹی کروں۔ ڈاکٹر فقید
 خالد عمرزئی ڈیپٹی ڈائریکٹر تعلیم (IMU) ہیں۔ میں
 بدستور اپنی ڈیوٹی جناب ڈاکٹر فقید خالد عمرزئی صاحب کے
 ساتھ ڈیوٹی کرتا رہا۔ جو کہ اولڈ جموں روڈ بنیام آباد
 سرکاری ہسپتال میں رہا جس نمبر ہیں۔ جناب ڈاکٹر
 فقید خالد صاحب کا تحریری لٹر بیان کے ہمراہ لگا ہے۔
 کچھ عرصہ قبل جناب خالد خان عمرزئی صاحب اور ان کے بیٹے
 ڈاکٹر فقید خالد صاحب کے مابین گویلو تنازع شروع ہوا۔
 لہذا جناب خالد خان عمرزئی صاحب نے مجھے اپنے حوالہ میں
 (8599222-331-0) سے کال کر کے کہا کہ آپ پورے لائن
 میں اپنی طاقت کی رپورٹ کر لو۔ میں نے FRP لائن آکر تحریر
 صاحب کے نوٹس میں لایا تو جواباً تحریر صاحب نے کہا کہ آپ
 جناب خالد خان عمرزئی صاحب سے اس بابت تحریری طور پر
 لکھ کر لائیں یا جناب خالد خان عمرزئی صاحب ہمارے اور ان
 بالا صاحبان کو کال کر کے آپ کے متعلق لکھ دیں تو میں
 آپ کو واپس کر دیں گے۔ لہذا اس بابت میں نے جناب
 خالد خان عمرزئی صاحب سے بات کی تو انہوں نے مجھ سے
 افسر ای بلا صاحبان کا نمبر طلب کیا۔ میں نے SMS کے ذریعہ
 جناب خالد خان عمرزئی صاحب کو دستہ جناب ڈیپٹی کمشنر صاحب

جو نام تازم والد صاحب اپنے کام اور تمام اوصاف
 میں لیں کہ لینی کام لہذا آپ صاحبان حقائق کو مدد
 رکھتے ہوئے میرے خلاف جاری انوکھی فائل کرنے کا
 حکم صادر فرمادیں۔ میں اس فیڈ بانی پر آپ صاحبان
 کا نام صرف منگور ریورٹ کا۔ میں عزیز گھرانے سے تعلق
 رکھتا ہوں۔ اور قلم جو لیں ہیں سرورس کے علاوہ کوئی ذرا
 حواس نہیں ہے۔ لہذا آپ صاحبان سے تعاون اور
 حکم کی اپیل ہے۔ میرا کوئی قصور نہیں ہے۔ میں
 نے اپنی ڈیوٹی بنیات اپنا ذرا اور خوش اسلوبی
 سے سرانجام دیا ہے۔ آپ صاحبان کو لکھ رہا ہوں۔
 لہذا آپ صاحبان سائل پر شفقت اور
 میری فرمائشیں۔ آپ کی بلڈ اقبال کے لئے دعا گو رہ رہا

آپ کا نام: محمد کنیل بہر مند عزیز ۱۰۴۷ کراچی اور

ار Bahad
 0347 9825341

Annex - 'F'

36

FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 177A

I, Deputy Commandant, FRP, KP as competent authority do hereby serve you Constable Behramand No.1047 of FRP/HQrs Peshawar.

(1) i- That consequent upon the completion of enquiry conducted against you by DSP FRP HQrs: Peshawar for which you were given full opportunity of hearing, but you failed to submit reply in response to the Charge sheet/statement of allegation and recommend you for Major punishment.


ii- On going through the findings/recommendations of the Enquiry Officers, the material available on record and other connected papers I, am satisfied that you have committed the following acts/omissions per Police Rules 1975.

As reported by Ex-Commissioner Mr. Khalid Khan that you Constable Behramand No.1047 of FRP HQrs: posted with gunner to him. He retired from service in the year of 2016 and relived you in 2017, but performing duty with his son Fahad Khan Deputy Director of Health Department without taking permission/notice from high-ups. Your this act amount to mis-conduct and highly punishable.

(2) Therefore, I, Deputy Commandant, FRP, KP as competent authority has tentatively decided to impose upon you Major/Minor penalty including dismissal from service under the said Rules.


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

(4) If no reply to this Final Show Cause Notice is received within seven (07) days of its delivery in the normal course of circumstances, it shall be presumed that you have no defence to put in and consequently ex-parte action shall be taken against you.


Deputy Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.

No. 2206 /PA, Dated 02/12/2021

del. 6-12-21


17101-4939228-9
0347-7825341

این گزارش در تاریخ ۱۴۰۱/۰۵/۲۵ (پانزدهم اردیبهشت ۱۴۰۱) تهیه گردید.
 در خصوص وضعیت حسابهای جاری و پس‌انداز شعبه مذکور که در
 تاریخ ۱۴۰۱/۰۵/۲۵ در حسابهای فوق‌الذکر موجود بود، به شرح
 زیر گزارش می‌گردد:

ردیف	نوع حساب	مبلغ موجود
۱	حساب جاری (معمول)	۱.۲۰۰.۰۰۰.۰۰۰
۲	حساب پس‌انداز (معمول)	۳.۵۰۰.۰۰۰.۰۰۰
۳	حساب پس‌انداز (تجارت)	۱.۰۰۰.۰۰۰.۰۰۰
۴	حساب پس‌انداز (سپرده)	۰.۰۰۰.۰۰۰.۰۰۰
۵	حساب پس‌انداز (پایه)	۰.۰۰۰.۰۰۰.۰۰۰
۶	حساب پس‌انداز (آمادگی)	۰.۰۰۰.۰۰۰.۰۰۰
۷	حساب پس‌انداز (تعمیرات)	۰.۰۰۰.۰۰۰.۰۰۰
۸	حساب پس‌انداز (سوانح)	۰.۰۰۰.۰۰۰.۰۰۰
۹	حساب پس‌انداز (سایر)	۰.۰۰۰.۰۰۰.۰۰۰
۱۰	حساب پس‌انداز (پایه)	۰.۰۰۰.۰۰۰.۰۰۰

مجموعاً: ۶.۷۰۰.۰۰۰.۰۰۰ ریال

این گزارش به موجب این سند صادر گردید و در تاریخ ۱۴۰۱/۰۵/۲۵ در حسابهای
 فوق‌الذکر موجود بود.

مدیر شعبه: *[Signature]*
 تاریخ: ۱۸/۱۲/۲۰۲۰

جہاں عالی

کوالم شٹوکار نوٹس منجانب ڈیپٹی کمشنر ٹنٹ صاحب FRP Har

معرض خدمت یوں کہ من سائل 2017 میں حسب الحکم اشراں
بالاصحاب بطور گنر جناب خالد خان گنر صاحب کو روانہ کیا گیا تھا بعد
ازان من سائل حسب الحکم جناب گنر صاحب کے آئے ہیں جناب
فید خالد خان نے سائل کو آن ڈیوٹی رکھا۔

بعد از ان جناب گنر صاحب اور ان کے بیٹے نے مابین گنر صاحب
تنازعات کے بنا در محو کو جناب گنر صاحب اور ان کے بیٹے نے واپس

رائس FRP Har کلور ٹون کا حکم دیا۔ بعد تفہیل حکم سرکار
موصوف نے من سائل رائس جعفر آیا جناب فخر صاحب کو واقع
مناجس پر فخر صاحب نے جو ایسا لکھا کہ گنر صاحب اشراں
بال کو کہ یا آنکو ریٹن دے دیں تب آپنی جعفری کی جائیں۔

من سائل نے جناب گنر صاحب کو فخر صاحب کی بات کی تو موصوف نے محو سے
جناب ڈیپٹی کمشنر صاحب کا نمبر بھیننے کا فرمایا تو من نے نمبر ارسال
آرڈر بزرگ SMS میا فو یا ایٹس Save ہے اسی طرہ سے

سائل سال 2017 تا 2021 تک جناب گنر صاحب خالد خان کے
سائل بطور گنر آن ڈیوٹی رہا جنکی تقاضا در حوالہ آنکو اشراں سائل
میں مع شہرہ و جہہ کال سٹریٹ کو گنر بھی معلق ہوا جا سکتا ہے
ایسی میرا بنا ہے جو منی بر حقیقت ہے۔

الس

18.12.2021

صاحب عالی

جو الم فائنل شو کا نزلو ٹیشن جو اس پر دفتر صاحب ڈی ای ایم ایٹس جماعت
 لیا اور حضور من عہد میں صورتوں کے من مسائل جو بعد اظہار اعتراض بالاصحابان Ex کشمیر خالرفان سے
 لکھنا تھا اور جنان موصوف صاحب سے من مسائل کو جناب موصوف صاحب سے اپنے
 قہر خانہ کو بطور نگر دیا تھا اور من مسائل کے جس اظہار اعتراض قہر خانہ کے ساتھ ڈی ای ایم ایٹس جماعت Ex
 کشمیر خالرفان کے حکم پر سرانجام دی ہے۔ تقریباً 3/4 مہینے پہلے ماہ اور سے یعنی
 کشمیر خالرفان اور اس کے بعد جناب قہر خانہ کے ساتھ کچھ گھر بلو تھانہ شہر میں
 تو من مسائل کو کشمیر خالرفان نے فون پر کال کر کے بتلایا کہ اسے لائن کولور سے
 ایسی حاضری رائٹ فرم فرم کرنا۔ اس کے روز من مسائل خود رائٹ فرم فرم کر کے
 کرنا کے لیے آیا اور حضور صاحب قہر علی شاہ کو بتلایا کہ کشمیر صاحب من مسائل کو
 کولور کیا ہے من کے کا فون کرنا تو حضور صاحب نے جواباً بتلایا کہ کشمیر صاحب کو آج
 کم یا اعتراض بالاصحابان کی نوٹس میں لانا اور یا اس سے خرید کر لے۔
 تو اس وقت من مسائل نے جناب موصوف صاحب کو کال کی تو انہوں نے من مسائل
 کو کال پر بتلایا کہ جناب ڈی ای ایم ایٹس صاحب فرم فرم کرنا۔ من مسائل نے اس
 وقت جناب ڈی ای ایم ایٹس صاحب فرم فرم کرنا۔ من مسائل نے اس
 کو سنبھال لیا۔ جن کا رفقار ڈی ای ایم ایٹس صاحب فرم فرم کرنا۔ من مسائل نے اس
 کے ساتھ نوٹس سال 2017، 2018، 2019، 2020 میں کسی ڈی ای ایم ایٹس
 بطور نگر سرانجام دی ہے۔ من کی کچھ صورتوں پر اہل فہم اور اور کورٹ کے
 کرنا کو تین من موقوف کر کے ہے۔

Handwritten signature

اس میں سے ایسا ہے جو موقوف ہے

بازار ایشیا، ستمبر 1047

صاحب عالی ا...
 چھوٹا عالم شوکار ٹوشن جا... (مستر صاحب ڈی پی کمانڈر صاحب ۴۴۲)
 پشور، مہاراجہ صاحبوں کے پاس... (مستر صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 کھار اور صاحب کو صوفیا صاحب نے... (صاحب صاحبوں کے ساتھ اور یہ ہے ٹوشن صاحبوں کے ساتھ)
 کو پھوٹا اور صاحب نے... (صاحب صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 خالد خان کے حکم پر سربراہ... (ٹوشن صاحبوں کے ساتھ اور یہ ہے ٹوشن صاحبوں کے ساتھ)
 خان اور اس کے... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 خان کے خون پر کمال کے... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 پشور میں... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 لائن آری... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 مسٹر کویجے... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 ٹوشن صاحبوں کے... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 آفسور صاحبوں کے... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 اسی وقت صاحب ڈی پی کمانڈر... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 اسی طرح... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 2019 اور سال... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 اور میں... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 ناشرکار ڈی پی کمانڈر... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)
 دس... (ٹوشن صاحبوں کے ساتھ ٹوشن صاحبوں کے ساتھ)

آپ کا نام...
 1047 ۴۴۲
 1111

جناب عالی

نہایت عاجزانہ استدعا ہے کہ جناب عالی صاحب محترم کو پیشکش کیے جانے والے اثبات عوامی اور نجی انہوں نے اپنے اپنے غیر قابل محسوس ذریعوں کے ذریعے فراہم کیا ہے۔ میں نے اپنی ڈیوٹی نہایت اہمیت سے سمجھا کر دی ہے۔ بعد میں جناب عالی صاحب محترم نے اور ان کے ساتھ غیر قابل محسوس کے مابین تمیزوں کی بنا پر ہر ایک کو (1) وقت یعنی صرف 21/02/2019 کو 10:00 AM میں جانوری کرنے کو کہا لیکن میرے متعلق انہوں نے پولیس اسٹیشن پر 10:00 AM کو کسی قسم کی اطلاع نہیں دی تھی جس پر میں ان کے ساتھ رابطہ کیا کہ آپ میرے متعلق 10:00 AM کو اطلاع کریں اور انہوں نے جو سے دستبردار نہیں کیا۔ نہایت صاحب کا تہہ طلب کیا جو تم میں نے ان کو دیا۔ اور انہوں نے کال کرنے سے قبل یہ کہہ کر سٹیشن پر 2019 میں فارغ کر دیا ہے اس پر میرے خلاف انٹرویو ہوئی انٹرویو میں ثابت ہوا کہ میں ان کے ساتھ ایسا نہیں کیا تھا۔ لیکن میرے ساتھ جو سے بطور سزا 03 سال 10 ماہ کی تھوڑی کٹائی گئی ہے میں نہایت غریب و محروم سے تعلق رکھتا ہوں اور خواہ کہ عطا ہوا کوئی ذریعہ میرے پاس نہیں ہے۔ لہذا استدعا ہے کہ حالات کو پیش نظر رکھتے ہوئے میری سزا صاف فرمائے خواہ کہ کٹائی کا 10 سالہ دور فرمائیں۔ اگرچہ اس میں میری کوئی تصویر نہیں ہے اس لیے میری پر سزا آج عطا ہونے کا تہہ دل سے مشکور ہے گا۔

آپ کا نام مبارک ہے۔ جس پر سزا 10/17/2019 FRP/HC
 عبدالرشید

جناب عالی
 درخواست کنندہ FRP/HC
 سے تعلق رکھتا ہے۔
 میں ڈیوٹی نہایت اہمیت سے سمجھا کر دی ہے۔
 اور جو سے 21/02/2019 سے سزا 03 سال 10 ماہ
 کی تھوڑی کٹائی گئی ہے۔
 اس لیے میری پر سزا آج عطا ہونے کا
 تہہ دل سے مشکور ہے گا۔
 FRP/HC/2019
 16/02/2022

Sir,
 Forwarded
 16/02/22
 Sir,
 Forwarded
 Sir,
 RESERVE INSPECTOR
 F.R.P. - HQ
 PESHAWAR

گزارش کے تحت سالانہ حکم 2009 کو بطور تیسری بجٹ
 اور این ڈی ٹی فونڈ اسٹیٹ میں انجام دے رہا ہے۔ 2017 میں سالانہ
 اندر ان راہ میں صوبہ E-کشمیر صوبہ کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ
 ہوا اور لہذا میں صوبہ E-کشمیر میں صوبہ کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ
 گنڈاپورٹی انجام دے رہا ہے۔ یہ اس دوران E-کشمیر صوبہ کے ساتھ ساتھ
 دیگر ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ
 کو FRP پولیس لائن میں اضافی کرنے کا حکم دیا گیا ہے۔ اس کے ساتھ ساتھ
 نے ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ
 صوبہ E-کشمیر میں صوبہ کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ
 کو انہوں نے 2017 سے شروع کیا ہے۔

گورنمنٹ کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ
 ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ
 2017 سے شروع کیا ہے۔

جس کے تحت ڈی ٹی کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ
 کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ
 کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ

میں سالانہ اندر ان راہ میں صوبہ E-کشمیر صوبہ کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ
 کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ دیگر ایجنسیوں کے ساتھ ساتھ

انہوں نے 2017 سے شروع کیا ہے۔

حضرت جناب انجینئر جنرل آف پولیس خیبر پختونخواہ لہشاور

Better copy (35)

جناب عالی! گزارش ہے کہ سائل محکمہ مذکورہ میں 2009ء کو بطور انسپل بونی ہوئے اور اپنی ڈیوٹی فوش اسٹیٹ سے انجام دے رہے تھے۔ 2017ء میں سائل حسب الحکم انسران بالا صاحبان سے عہدیت جناب خالد خان صاحب کے ہمراہ بحیثیت گنر لفینا ہوئے اور بعد میں حسب ہدایت عہدیت جناب صاحب موصوف نے بیٹے فیہد خان کے ہمراہ گنر ڈیوٹی انجام دے رہے تھے اس دوران عہدیت جناب صاحب اور ان کے بیٹے فیہد خان کے درمیانی گفتگووں تنازعہ کے کچھ ایسے گھٹیا اور گھٹنہ جہاز کے سائل کو FRP پولیس انٹرن میں حافی کرنے کا حکم دیا لیکن اس سلسلے میں عہدیت جناب صاحب نے انسران بالا صاحبان کو کسی قسم کی اطلاع نہیں دی تھی۔ لہذا رابطہ کرنے پر جناب صاحب نے عہدیت جناب ڈیٹی گمانڈنٹ سے فون پر رابطہ کیا اور کہا کہ سائل کو ایسٹوں نے 2017ء سے فارغ کر لیتے۔

بعد میں صدر خلاف حکمانہ انکو آئی شروع کی گئی اور انکو آئی رپورٹ میں گھٹنہ جہاز کے بیٹے نے عہدیت جناب صاحب کو ڈیوٹی پر طار کیا گیا ہے لیکن اس کے باوجود سائل سے جو ال آرڈر نمبر 271-75/PA مورخہ 03/02/2022 سے 3 سال اور 9 مہینے کی تنخواہ کی ریکوری کا حکم صادر کیا گیا ہے جو کہ برصغیر زیادتی ہے۔

جناب وال! روٹیکہ علم ڈیوٹی سائل نے جناب صاحب کے عہدیت جناب فیہد خان کے ہمراہ بطور گنر انجام دی ہے اور بعد میں ان کے درمیان کچھ تنازعہ پیدا ہوا اور گنر عہدیت جناب صاحب کے ساتھ مخالفت کی وجہ سے سائل کے ساتھ زیادتی اور آریا اور انسران بالا صاحبان کو صدر خلاف شکایت کی۔

یہ کہ سائل ایڈز یب گھرانے سے تعلق رکھتا ہے بقصور ہے اور کسی قسم کی غیر خالی نہیں ہے سائل نے اب تک کوئی غیر خالی نہیں کی ہے۔

لہذا استدعا ہے کہ سائل کا عہدیت تین سال اور 9 مہینے ڈیوٹی میں شمار کرنا اور تنخواہ ریکوری نہ کرنا کا حکم صادر فرمادیں فقط

عین نواز شیروانی

الغرض

(36)

VAKALATNAMA**BEFORE THE SERVICE TRIBUNAL K.P.K.**
PESHAWAR

Appeal. No. _____/2022

MR. BEHRAMAND Applicant**VERSUS****Govt of KPK and others** RespondentsI/We **Behramand Constable No. 1047 FRP**

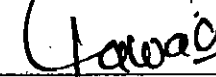
Do hereby appoint and constitute **Dr. Fawad Jan Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 29/06/2022

CLIENT(S)



ACCEPTED



Dr. Fawad Jan
Advocate
(BC-19-1109)
17101-0278021-9

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