

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 555/2016

Date of Institution ... 25.05.2016

Date of Decision ... 04.12.2017

Hukam Khan, Ex-Constable No. 1298,
FRP/Head Quarter, Peshawar.

... (Appellant)

VERSUS1. The Provincial Police Officer Khyber Pakhtunkhwa, Peshawar
and 2 others.

... (Respondents)

MR. MUHAMMAD ASIF YOUSAFZAI,
Advocate

--- For appellant.

MR. MUHAMMAD RIAZ PAINDA KHEL,
Assistant Advocate General

... For respondents.

MR. AHMAD HASSAN,
MR. MUHAMMAD AMIN KHAN KUNDI... MEMBER(Executive)
... MEMBER(Judicial)JUDGMENT

AHMAD HASSAN, MEMBER.- Arguments of the learned counsel for
the parties heard and record perused.

FACTS

2. The brief facts are that the appellant was serving as Constable when
subjected to enquiry on the allegations of being Afghan national and dismissed
from service vide impugned order dated 09.03.2016. He preferred departmental
appeal which was also rejected ⁱⁿ on 05.05.2016, hence, the instant service appeal
on 25.05.2016.

ARGUMENTS

3. Learned counsel for the appellant argued that vide impugned order dated 09.03.2016 he was dismissed from service on the charge of being Afghan national. Enquiry was not conducted in the mode and manner prescribed in the rules. Despite the fact that status of appellants family was probed by the Special Branch and finally declared it in their report that they were Pakistani nationals. It is a sufficient ^{proof} that appellant is also a Pakistani national. That the Deputy Commissioner Peshawar vide letter dated 26.10.2017 confirmed that after verification it was proved that the appellant is a Pakistani national. CNIC of other family members blocked by NADRA have also been unblocked/ released.

4. On the other hand learned Assistant Advocate General argued that all codal formalities were observed before passing the impugned order. He was treated according to law and rules.

CONCLUSION.

5. Careful perusal of record would reveal that Deputy Commissioner Peshawar through bearing on 20447/DC(P)/AG-II dated 26.10.2017 addressed to the Director General NADRA Khyber Pakhtunkhwa, wherein after verification it has been confirmed that the appellant is a Pakistani national. The letter also contains signatures of representative of the NADRA, I.B, ISI and Police. Due to this development the main charge leveled against the appellant and on the basis of which major penalty of dismissal from service was imposed on him is no more in the field. Moreover, CNIC of other family members blocked by NADRA have also been released. We are of the considered view that he stands absolved of the charges leveled against him and deserves to be reinstated in service.

6. In view of the foregoing, the appeal is accepted, the impugned order dated 09.03.2016 and 05.05.2016 are set aside. The intervening period may be treated as leave of the kind due. Parties are left to bear their own costs. File be consigned to the record room.



(AHMAD HASSAN)
MEMBER




(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

ANNOUNCED
04.12.2017

11.08.2017

Clerk of the counsel for appellant present. Mr. Kabirullah Khattak, Assistant AG for the respondents present. Clerk of the counsel for appellant seeks adjournment on the ground that learned counsel for the appellant is not available today. Adjourned. To come up for arguments on 04.12.2017 before D.B.


(Muhammad Amin Khan Kundi)
Member (J)


(Muhammad Hamid Mughal)
Member (J)

Order

04.12.2017

Counsel for the appellant and Asst: AG for respondents present. Arguments heard and record perused.

Vide detailed judgment of today of this Tribunal placed on file, the appeal is accepted, the impugned order dated 09.03.2016 and 05.05.2016 are set aside. The intervening period may be treated as leave of the kind due. Parties are left to bear their own costs. File be consigned to the record room.

Announced:
04.12.2017


(MUHAMMAD AMIN KHAN KUNDI)
Member


(AHMAD HASSAN)
Member

555/16

01.09.2016

Counsel for the appellant and Mr. Muhammad Jan, GP alongwith Ihsanullah, H.C for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 21.12.2016.


Chairman


21.12.2016


Counsel for the appellant and Additional AG for the respondents present. Learned counsel for the appellant submitted rejoinder which is placed on file. To come up for arguments on 05.05.2017 before D.B.

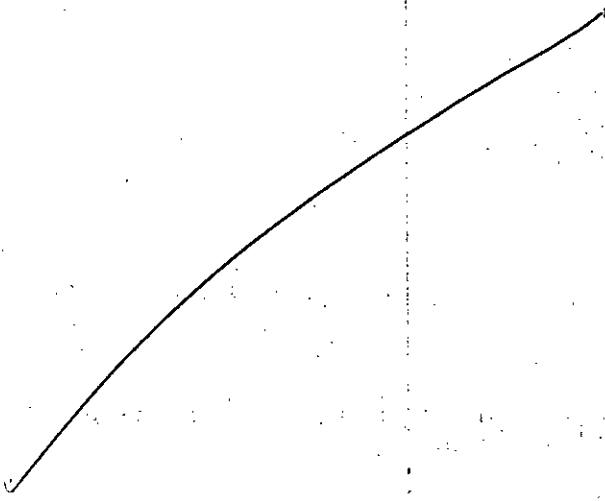
(MUHAMMAD AAMIR NAZIR)
MEMBER 

05.05.2017

Clerk to counsel for the appellant and Assistant AG for the respondents present. Clerk to counsel for the appellant requested for adjournment. To come up for final hearing for 11.08.2017 before D.B.


Member


Chairman



30.05.2016

Counsel for the appellant present. Learned counsel for appellant argued that the appellant was serving as Constable when subjected to enquiry on the allegations of being Afghan National and dismissed from service vide impugned order dated 09.3.2016 where-against he preferred departmental appeal which was also rejected on 05.05.2016 and hence the instant service appeal on 25.05.2016.

That the appellant is a Pakistan National and wrongly declared as an Afghan National and, furthermore, the enquiry was not conducted in the prescribed manners and as such the impugned orders are liable to be set aside.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days. notices be issued to the respondents for written reply/comments for 28.07.2016 before S.B.


Chairman

28.07.2016

Clerk of counsel for the appellant and Ihsanullah, H.C alongwith Addl. AG for the respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 01.09.2016 before S.B.




Chairman

Appellant Deposited
Security & Process Fee

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 555/2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	25/05/2016	<p>The appeal of Mr. Hukam Khan presented today by Mr. Muhammad Asif Yousafzai 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	26-5-16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>30-5-16</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 555 /2016

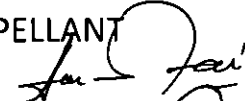
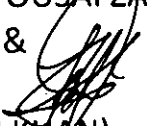
Hukam Khan

V/S

Police Deptt:

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APPELLANT
THROUGH: 
(M.ASIF YOUSAFZAI)
& 
(TAIMUR ALI KHAN)
ADVOCATES, PESHAWAR

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR.

APPEAL NO. 555/2016

Hukam Khan, Ex-Constable No. 1298,
FRP/ Head quarter, Peshawar.

A.W.P. Province
Service Tribunal

Diary No. 533

Dated 25-5-2016

VERSUS

1. The Provincial Police Officer, KPK, Peshawar.
2. The Commandant, Frontier Reserve Police, KPK, Peshawar.
3. The Dy: Commandant, Frontier Reserve Police, KPK, Peshawar.

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 05.05.2016, WHEREBY THE DEPARTMENT APPEAL OF THE APPELLANT AGAINST THE ORDER DATED 09.03.2016, WHEREIN PENALTY OF DISMISSAL FROM SERVICE WAS IMPOSED, HAS BEEN REJECTED FOR NO GROUNDS.

PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 05.05.2016 AND 09.03.2016 MAY BE SET ASIDE AND RESPONDENTS MAY BE DIRECTED TO REINSTATE THE APPELLANT WITH ALL BACK AND CONSEQUENTIAL BENEFITS. AND ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT, MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

FACTS:

1. That the appellant was appointed as Constable through NTS in CCP Peshawar on dated 30.12.2014 and later on transferred to FRP/HQrs Peshawar. The appellant performed his duty up to the entire satisfaction of his superiors and no complaint has been filed against him.

Filed to the
Registrar
25/5/16

- 2
2. That the charge sheet was issued to the appellant in which the allegation against the appellant was:

This office intimated by Worthy Chairman FRP/KPK that you constable Hukam Khan No. 1298 FRP/HQrs: and his family has been declared as Afghan Nation, after meeting of joint committee, comprising of ISI, SB, Nadra, IB and Afghan Commissionerate.

The charge sheet was duly replied by the appellant and denied the allegation therein. (Copies of charge sheet and reply to charge sheet are attached as Annexure-A&B)

3. That the inquiry was conducted against the appellant by the Khurshid Khan RI/FRP/Peshawar Range in which he took the statements of Ilaqa Nazim, Chairman Nazim and also Elders of the Village in which they stated that the appellant is belonging to "Village ALizai P/O Charpariza Thana Khazana Tehsil and District Peshawar but despite that the inquiry officer gave finding that Constable Hukam Khan No.1298 is an Afghan National As per report of Special Branch, ISI, IB and Nadra and recommended that he may be "Removed from Service", however the inquiry report was not handed over to the appellant.
4. That the show cause notice was issued to the appellant in which the appellant was alleged that "This office intimated by Worthy Chairman FRP/KPK that you constable Hukam Khan No. 1298 FRP/HQrs: and his family has been declared as Afghan Nation, after meeting of joint committee, comprising of ISI, SB, Nadra, IB and Afghan Commissionerate". Which was replied by the appellant in which he clearly mentioned that the appellant is a Pakistani national. (Copies of the show cause and reply to show cause are attached as Annexure-C&D).
5. That on the basis of that one sided inquiry, the Deputy Commandant FRP passed an order on dated 09.03.2016 which was received by the appellant on 17.3.2106 in which the appellant was dismissed from the service. (Copies of order is attached is attached as Annexure-E)
6. That against the order dated 9.3.2016, the appellant filed departmental appeal which was also rejected on 5.5.2016 for no good ground. (Copies of departmental appeal and rejection order are attached as Annexure-F&G)
7. That now the appellant comes to this august Tribunal on the following grounds amongst others.

GROUNDS:

- A) That the impugned order dated 5.5.2016 and 9.03.2016 is against the law, rules and material on record, therefore liable to be set aside.
- B) That no proper inquiry was conducted against the appellant before imposing major penalty of dismissal from service which is not permissible in law.
- C) That no verification of the documents of the appellant has been done by the department nor inquired from the concerned Authorities before imposing the major punishment of dismissal from service, Which is violation of law and rules.
- D) That no opportunity of personal hearing was provided to the appellant which is violation of Law and Rules.
- E) That during inquiry, the Ilaqa Nazim, Chairman Nazim and also Elders of the Village gave statement to the inquiry officer that the appellant is belonging to "Village ALizai P/O Charpariza Thana Khazana Tehsil and District Peshawar" but despite that the inquiry officer gave finding that Constable Hukam Khan No.1298 is an Afghan National As per report of Special Branch, ISI, IB and Nadra.
- F) That the appellant possessed domicile of Peshawar and Peshawar I.D card No. 17301-1071848-7 and other family members on father side also possessed the NICs of Peshawar which shows that the appellant and his family is Pakistani National. (Copies of appellant domicile, and his father family members CNICs are attached as Annexure- H&I)
- G) That verification of national status of the appellant's family member was conducted by the Additional Inspector General of Police, Special Branch Head Quarter Branch Peshawar Dated 11.2.210 in which A.IG of police declared appellant family member as Pakistani National. Similarly IB reported that the Family of the appellant as Pakistani National in his Letter No. ECR 250-SVA/7-vol (21)/9291-9428/s.III Dated 28.5.2103. All these evidence shows that the appellant is also a Pakistani National. (Copies of A.I.G Special Branch verification and IB report are attached as Annexure- J&K)
- H) That the Police station Khazana also reported that the appellant is permanent resident of KPK, Peshawar. (Copy of report is attached as Annexure-L)

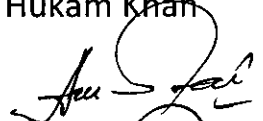
- 4
- I) That the Appellant and his family have also his own house and property which shows that appellant is Pakistani national. (Copy of documents is attached as Annexure-M).
 - J) That the Family member of the appellant namely (Atlas Khan) was remained as Army Employee, which shows that they belong to Pakistan.
 - K) That the attitude and conduct of the Department shows that they were bent upon to remove the appellant at any cost.
 - L) That the appellant was condemned un-heard which is violation of law.
 - M) That the appellant has been condemned unheard and has not been treated according to law and rules.
 - N) That the appellant seeks permission 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.



APPELLANT
Hukam Khan

THROUGH:



(M.ASIF YOUSAFZAI)

&



(TAIMUR ALI KHAN)
ADVOCATES , PESHAWAR

"A" (A)

(5)

CHARGE SHEET U/R 6(1)(A) NWFP (NOW KHYBER PAKHTUNKHWA)
POLICE RULES 1975.

You **Hukam Khan No.1298**, posted at FRP/HQrs: is hereby charged for committing the following Omission/Commissions.

This office intimated by Worthy Commandant FRP/KPK that You Constable Hukam Khan No.1298 FRP/HQrs: and his family has been declared as Afghan Nation, after meeting of joint committee, comprising of ISI, SB, Nadar, IB and Afghan Commissionrate.


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

Your reply should reach to the enquiry officer within (7) days from date of receipt of this charge Sheet, failing with Ex-part proceeding shall be initiated against you.

SUMMARY/STATEMENT OF ALLEGATION

This office intimated by Worthy Commandant FRP/KPK that You Constable Hukam Khan No.1298 FRP/HQrs: and his family has been declared as Afghan Nation, after meeting of joint committee, comprising of ISI, SB, Nadar, IB and Afghan Commissionrate. Your reply should reach to the enquiry officer within (7) days from date of receipt of this charge Sheet, failing with Ex-part proceeding shall be initiated against you.

ایک کاپی جانج سید محمد
20/12/15
NIC No-17301-1071848-7


(Mehmood Hussain)
Superintendent of Police FRP,
Peshawar Range Peshawar.
9 10-12-15

ATTESTED


Mobile:- 0300-9309941

حوالہ فارغ التحصیلی نامہ سائنس و معاشقہ 28/12/2015
کو موجود طور پر حروف و حروف تہجیوں -

اس سائنس موصوفہ علی زئی علیہ السلام نے جہاں خزانہ علوم و کتب
کا مستند رہا ہے وہیں اس کی تعلیم حاصل کی ہے۔

سائنس 1990-2-9 کو موصوفہ علی زئی کی تعلیم حاصل کی ہے۔
حوالہ: عدل سائنس علی زئی عدل سائنس علی زئی
سے حاصل کیا ہے۔ عدل سائنس کا ادبی نثر و گفت گوی
کے بارے میں سائنس کی تعلیم حاصل کی ہے۔
اس کا نام مع کلام اللہ حضرت علی زئی اور ربی
کا نام اس کے ذمہ داری کا ہے۔ اس کے حاصل کیا ہے۔
سائنس نے باقاعدہ ذمہ داری سائنس اور سائنس اور سائنس
سائنس NTIS سے سائنس کے بارے میں سائنس میں سائنس
کے بارے میں سائنس کے بارے میں سائنس کے بارے میں
سائنس سائنس سائنس کے بارے میں سائنس کے بارے میں

- سائنس کے والد کا سائنس کا ذمہ داری اور محمد امان 17301-4563175
- سائنس کے دادا محمد امان اور صالح محمد 17301-6404988-7
- سائنس کے دادا صالح اور محمد امان 137-09-010357
- سائنس کے والد کا نام سائنس علی زئی اور محمد امان 17301-2167877-2

سائنس کے دادا محمد امان کے نام 1960 میں موصوفہ علی زئی
سے حاصل کیا ہے۔

اور 1970 میں کم عمری کی ابتدا ہوئی۔ جو اس کے
ملا علیہ السلام کے ہندوستان سے ہندوستان کے ہندوستان کے
کے ہندوستان کے ہندوستان کے ہندوستان کے ہندوستان کے ہندوستان کے
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ATTESTED

[Signature]

"E"
7

FINAL SHOW CAUSE NOTICE UNDER POLICE RULES 1975.

I, Deputy Commandant, FRP, KPK as competent authority do hereby serve you Constable Hukam Khan No. 1298 of FRP/HQrs, Peshawar.

(1) i- That consequent upon the completion of enquiry conducted against you by RI/FRP.PR for which you were given full opportunity of hearing.

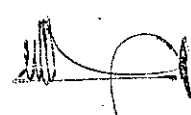
ii- On going through the findings/recommendations of the Enquiry Officer, the material available on record and other connected papers I, am satisfied that you have committed the following acts/omissions per Police Rules 1975.

This office intimated by Worth Commandant FRP/KP that you constable Hukam Khan No.1298 FRP/HQrs: Peshawar and your family has been declared as Afghan Nation after meeting of joint committee, comprising of ISI, SB, Nadara, IB and Afghan Commissionrate.

(2) Therefore, I, Deputy Commandant, FRP, KPK 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 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 the seven days of it 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.**

ATTESTED


کہا کہ شوکار چارہ خراب دینی تائید PMP ضمیمہ نمبروں فراہم کیے نہ
 مخصوص شہرت ہوں اسے سائل کے متعلق التزام حد سائل احسان
 باشندہ ہے۔
 خیالاً

① سائل کے آبانہ و اولیٰ سال ۱۹۴۶ سے مونیہ علی نے
 عدلیہ کھان خزانہ کھسلی و ضمیمہ کسار کے مستقل باشندہ
 بنے۔ اور سائل کے پیردادا صاحب محمد کے نام سال ۱۹۶۰
 کے اشاعت ہے۔

② سائل کے مہتر کا اہتمام نو طرفہ حامی سیکلری سکول
 لیتا رہی ہے ماس کا ہے۔
 سائل نے BA Com کی ڈگری اسلام آباد ڈگری کالج لیتا رہ
 سے حاصل کیا ہے۔ سائل کے اٹھارہ سال عمر پر ہوتے
 سائل نے سال ۲۰۰۹ میں حاصل کیا ہے۔
 فون کا نمبر ۱۷۳۰۱-۱۰۷۱۹۴۸-۲

③ سائل نے NTS کا امتحان ۲۰۱۴ میں دیا تھا۔
 جسے بعد مہتر نے پیر سائل سیکشن حوالہ
 اور مشن ہرا اور لوئس کے باقاعدہ ووری
 تملش کے بعد سائل نے ڈگری کی تصدیق
 لیتا رہ لوہڑے سے جو سائل سال ۲۰۱۴ کے دسمبر میں
 باقاعدہ کثرت سائل کھری حوالہ
 کر سائل لوئس سکول سوات سے حاصل کی ہے۔
 اور سائل خلفاً کی کر رہا ہے، اس سائل کا تعلق
 لیکن مملکت میں اسے معلوم نہیں ہے سائل کے
 اضلاعی نمونے کی شکایت کی۔ جو مونیہ پر مبنی ہے
 سائل پاکستانی ہے۔ اور قریب پاکستان کا وقار ہے
 استیعاب سائل کا کھالصاف کا کارڈ ہے۔
 الوداع

ATTESTED

ORDER.

(9) 'E'


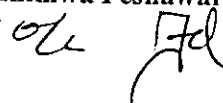
This order shall dispose off on the departmental enquiry against Constable Hukam Khan No.1298, of FRP/HQrs.

Brief facts of the case are that he was recruited in Police Department as Constable through NTS in CCP Peshawar & later on transferred to FRP/HQrs Peshawar. There were some allegations that he is an Afghan National. Whereupon a joint enquiry comprising of ISI, IB, NADRA & Special Branch was conducted in order to unearth the factual position.

In this connection **Constable Hukam Khan No.1298 of FRP HQrs: Peshawar** was issued Charge sheet/statement of allegation vide this office Order No.790/PA, dated 10.12.2015 and Mr. **Khurshid Khan RI/FRP/PR** was appointed as Enquiry Officer into the matter. Who after fulfilling necessary process submitted his findings wherein he mentioned in his Finding that constable Hukam Khan No.1298 is an Afghan National as per the report of Special Branch, ISI, IB and Nadra and recommended that he may be Removed from Service. He was issued Final Show Cause Notice, which was received by him personally, but his reply was found not satisfactory. According to the country rule section No.11 of 1973. It is obligatory for every Government Servant must have Pakistani Nationality.

Keeping in view of the above circumstance, an opportunity for personal hearing was given to said constable, but he failed to produce any cogent reason in his favour. As such the undersigned came to the conclusion that the said constable and his family member have been declared as Afghan National as per reports of the Joint committee comprising of Special Branch, IB, ISI and Nadra. It is obligatory for every Government Servant that he/she must have Pakistani Nationality, as per rules and regulations he is not eligible for Government Job. Therefore Constable Hukam Khan No.1298 of FRP HQrs: Peshawar is hereby dismissed from service under Police Rule 1975 with immediate effect and FIR under relevant section of Law be registered against the above named constable Hukam Khan No. 1298.

Order announced


Deputy Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar


No. 202-25 /PA dated Peshawar Range the 09/03 /2016.

Copy to:-

1. The Commandant FRP KP, Peshawar for information please.
2. Accountant FRP HQrs: Peshawar.
2. SRC/OASI/FRP/HQrs: Peshawar.

ATTESTED


(10) "F"

To

The Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

SUBJECT: DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 09.03.2016, RECEIVED BY THE APPELLANT ON 17.03.2016 WHEREBY THE APPELLANT WAS DISMISSED FROM SERVICE.

Respected Sir,

Most humbly it is submitted that:

1. That the appellant was appointed as Constable through NTS in CCP Peshawar on dated 30.12.2014 and later on transferred to FRP/HQrs Peshawar. The appellant performed his duty up to the entire satisfaction of his superiors and no complaint has been filed against him.
2. That the charge sheet was issued to the appellant containing the allegation that:

This office intimated by Worthy Chairman FRP/KPK that you constable Hukam Khan No. 1298 FRP/HQrs: and his family has been declared as Afghan Nation, after meeting of joint committee, comprising of ISI, SB, Nadra, IB and Afghan Commissionrate. **(Copy of charge sheet is attached)**.
3. That the charge sheet was duly replied by the petitioner and denied the allegation. **(Copy of reply of charge sheet is attached)**
4. That the inquiry was conducted against the appellant by the Khurshid Khan RI/FRP/PR in which he gave finding that Constable Hukam Khan No.1298 Is an Afghan National As per report of Special Branch, ISI, IB and Nadra and recommended that he may be "Removed from Service".
5. That the show cause notice was issued to the appellant in which the appellant was alleged that "This office intimated by Worthy Chairman FRP/KPK that you constable Hukam Khan No. 1298 FRP/HQrs: and his family has been declared as Afghan Nation, after meeting of joint committee, comprising of ISI, SB,

ATTESTED

[Signature]

Nadra, IB and Afghan Commissionrate". Which was replied by the appellant wherein he has clearly mentioned that the family of appellant was resident of "Village ALiZai P/O Charpariza Thana Khazana Tehsil and District Peshawar" since 1946 and the appellant also got I.D card No. 17301-1071848-7 and verification of national status of the appellant's family member was conducted by the Additional Inspector General of Police , Special Branch Head Quarter Branch Peshawar in which A.I.G of police declared appellant and his family members as Pakistani National according to which the Appellant is also a Pakistani National. **(Copy of the Show cause, reply and other documents are attached).**

6. That the Deputy Commandant FRP passed an order dated: 09.03.2016 which was received by the appellant on 17.3.2106 wherein the appellant was dismissed from the service without proper chance of defence to the appellant . **(Copy of order is attached).**

7. That now the appellant files the departmental appeal on the following grounds.

GROUND:

A) That the impugned order dated 9.03.2016 is against the law, rules and material on record, therefore liable to be set aside.

B) That no regular inquiry was conducted against the appellant before imposing major penalty of dismissal from service which is not permissible in law.

C) That the verification was already done at the time of appointment of appellant and such the second verification was done with ulterior motives to remove the appellant and to appoint someone else in his place. Thus the whole action was done with the malafide to create a post/vacancy for blue eyed person.

D) That no codal formalities were followed by the department before imposing the penalty which is violation of Superiors courts judgment.

ATTESTED

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- E) That no opportunity of personal hearing was provided to the appellant which is violation of Law and Rules.

- F) That during inquiry the Ilaga Nazim, Chaiman Nazim and also Elders of the Village gave statement that the appellant is belonging to "Village ALizai P/O Charpariza Thana Khazana Tehsil and District Peshawar".

- G) That the appellant also got I.D card No. 17301-1071848-7 and verification of national status of the appellant's family member was conducted by the Additional Inspector General of Police, Special Branch Head Quarter Branch Peshawar Dated 11.2.210 in which A.IG of police declared appellant and his family members as Pakistani National and also Nadra declared the Family of the appellant as Pakistani National in his Letter No. ECR 250-SVA/7¹-vol(21)/9291-9428/s.III Dated 28.5.2103 according to which the Appellant is also a Pakistani National.

- H) That the father and grand father of the appellant have also had the passport of Pakistani national. (Copy of the passport is attached).

- I) That the Appellant and his forefathers have their houses and other landed property since creation of Pakistan, which shows that appellant is Pakistani national. (Copy of documents is attached).

- J) That the Family member of the appellant namely (Atlas Khan) was remained in Armed Forces (Army), which shows that they belong to Pakistan.

- K) That the attitude and conduct of the Department shows that they were bent upon to remove the appellant at any cost.

ATTESTED

L) That the appellant was condemned un-heard which is violation of law.

It is therefore, most humbly requested that impugned order dated 09.03.2016 may be set aside and reinstated the appellant with all back and consequential benefits.


Appellant

Ex. constable Hukam Khan
No. 1298 FRP/HQrs
Village ALizai P/O Charpariza
Thana Khazana, Tehsil and District
Peshawar.
Cell No. 0315-9094141,
0300-9309941

Date:

ATTESTED



ORDER

G 14

This order is hereby passed to dispose of departmental appeal under rule No: 11 of Khyber Pakhtunkhwa, Police Rules 1975, submitted by Ex- Constable Hukam Khan No.1298 of FRP HQrs against the order of Dy: Commandant / FRP, KPK Peshawar.

Brief facts of the case are that Ex-Constable Hukam Khan No.1298 of FRP HQr Peshawar was recruited in police department as Constable through NTS in CCP Peshawar and later on transferred to FRP HQrs: Peshawar. There were some allegations that he is an Afghan Nation upon which a joint enquiry comprising of ISI, IB, NDRA and Special Branch was constituted to conduct enquiry in order to unearth the factual position.

In this connection Constable Hukam Khan No.1298 of FRP HQrs: Peshawar was issued charge sheet/statement of allegations vide office order No.790/PA, dated 10.12.2016 and Mr Khurshid Khan RI FRP Peshawar Range was appointed as Enquiry officer into the matter who after fulfilling necessary process submitted his findings wherein he mentioned, that Constable Hukam Khan No.1298 is an Afghan National as per the report of Special Branch, ISI, IB and NADRA and recommended that he may be removed from service. He was issued / served with Final Show Cause Notice to which he replied but his reply was found unsatisfactory.

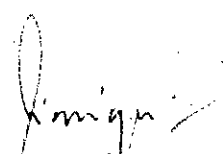
According to the country rule section No.11 of 1973, it is obligatory for every Government servant, that he must have Pakistani Nationality. Therefore, after completion of the due codal formalities constable Hukam Khan No.1298 of FRP HQrs: Peshawar was dismissed from service under Police Rules 1975 with immediate effect.

The enquiry file of the applicant perused and found that a proper departmental proceedings initiated against him and all the codal formalities have been fulfilled during the course of enquiry, by the Competent Authority.

He was also heard in person but he failed to advance any cogent reason in his defence thus his hearing was found unsatisfactory.

Keeping in view the above facts there is no cogent reason to interfere in the order of Dy: Commandant FRP KPK, Peshawar. **Therefore, his appeal is rejected.**


Order pronounced in the presence of applicant.

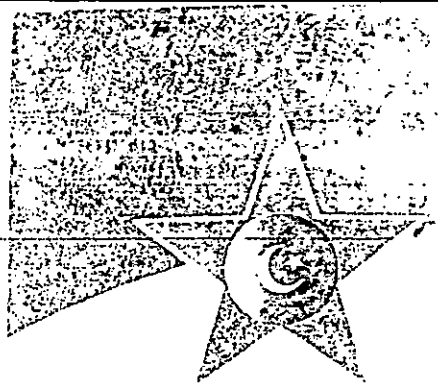

Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa, Peshawar.

No. 388940/EC, dated Peshawar the 5 / 5 /2016

Copy of above is forwarded to the

1. Dy: Commandant FRP KPK, Peshawar, for information and n/action.
2. ✓ Ex-constable Hukam Khan No.1298 village alizai P/O Charpariza PS. Khazana, Tchsila district Peshawar.

ATTACHED




DECLARATION

Union Court
Adm No. 80 P



H.
15

I Declare That I was born Of Parents Who Are Permanently

Domiciled in N.W.F.P. Having Belonged To In By Birth/settled In It. I Belonged By Birth To

Mohallah _____

Village Alizai Tehsil Peshawar District Peshawar

Signature Of Applicant
[Signature]

Pursuance To The Declarations Dated _____

Filed By MUHAMMAD KHAN S/D/W/Of Ghulam Nabi Khan

Domicile in The N.W.F.P It is Hearby Certified That The Said _____
Is Born Of Parents Who Are Permanent Residents Of The N.w.f.p Having Belonged To it By Birth/settled In It. I Have
Satisfied My Self Personal / my Knowledge Verification That the Above
Declaration is True And Certify.

Countersigned
3316 Dolt
30/5/00

This 25 Days Of 02 20 00

DEPUTY DISTRICT REVENUE OFFICER

District Revenue Officer

Stationary Officer

ATTESTED
[Signature]

تقدیر کی جاتی ہے کہ مسماة

نگم خان

ولدا دختر

علمی نرخی

گاؤں اشہر

ضلع لہڑا و سر

گا کی رہائشی پیدائشی باشندہ ہے اور اس کے والدین اشہر بھی علاقہ مذکورہ کے رہائشی و پیدائشی باشندگان ہیں اور ایک اچھے پاکستانی ہیں۔ میں ان کو ذاتی طور پر جانتا ہوں۔

جنااب عالی!

حسب تقدیر

مسماة

تحصیل

پیر دختر

بمعد والدین موضع علم نرخی

صدر بہر حد کے پیدائشی ہیں۔ ریورٹ سے معلوم ہے۔

لہڑا و سر

ضلع

J
21

From :-

The Additional Inspector General of Police,
Special Branch Headquarter Peshawar.

To,

The Manager Coordination,
PHQ, Peshawar, Phase-v,
Hayatabad Peshawar.

No

1317


/secty, dated 11 / 02 / 2010.

Subject:-

Verification of national status

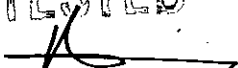
Reference to your office letter # SV-305/1062, dated 6 Nov, 2009. It is stated that secret inquiry conducted by special branch AGO (City) and they declared following individuals as Pakistani National.

- (1) Saida Jan S/o Saleh Muhammad
- (2) Safia Bibi B/o Saida Jan
- (3) Mummada Jan S/o Saleh Muhammad
- (4) Zaheerullah S/o Muhammada Jan


Additional Inspector General of Police,
Special branch Headquarter, Peshawar.

08 02/2010

ATTESTED



II

K
22

They all are declare as Pakistan
national and the letter No.
ECR 250-SVA/1-Vol(20)19291-9428/5-III
dated 28/05/2013.

Sent to Nadra Regional H/Q Hayat
bad Peshawari on 19-01-2015

1B. Report

ATTESTED

حضرت صاحب سیرت شریف برادر لیسٹریٹیو پولیس ایجنسی

6

نقشہ پتہ اولیٰ خانہ بڑی سندھ جیل اسٹیشن کے

پانچویں نمبر صاحب قندہ قمرانہ

(28)

سال ۲۰۱۶

موزخہ ۱۱۱ الف

Suppl. City Police Peshawar

کلاس اول

<p>راپورٹ نمبر آئی ڈی اور دیگر معلومات مات پال کی نسبت مزاجی اور اگر کوئی شخصیت تو یہ</p>	<p>بیان نمبر داران نسبت مزاجی اور دیہ خاگی اگر کوئی شخصیت قومیت بقدر درجہ</p>	<p>نام تصدیق کنندہ متعلق خیال جلیں بقدر درجہ</p>
<p>ضبا علی ا رہی ہجرت کے بعد رینگا رڈ کھانہ سے کھی خانہ صاحب کی صاحبزادی اور پانچویں نمبر صاحب قندہ قمرانہ راپورٹ نمبر آئی ڈی اور دیگر معلومات</p>	<p>صبا علی ا حقانی لفظی طور پر اللہ حیصل حسنہ کی صاحبزادی اور ولید علی جلالی کی علی بی بی صاحبزادی کی اور عبدالخالق کی کھانہ سے لے کر لگاتار راپورٹ نمبر آئی ڈی اور دیگر معلومات</p>	<p>صبا علی ا من لکھنؤ کی رہنے والی اور حکم خانہ کی صاحبزادی اور راپورٹ نمبر آئی ڈی اور دیگر معلومات کھانہ سے لے کر لگاتار راپورٹ نمبر آئی ڈی اور دیگر معلومات</p>

SHOPS 42
14-3-14

HIDAYATULLAH
Sub Editor of Debates
Provincial Assembly
Khyber Pakhtunkhwa.

ATTESTED

نقشہ تصدیق چال چلن اور گورنمنٹ ہسپتال
جو تاریخ 13 اگست سال 2004ء سے بعہدہ کنسٹیبل بھرتی کیا گیا۔

ولدیت علامہ عبدالمجیب ذات اطفال گوت سنہ ذہب اسلام آباد
ساکن محلہ علی و فی دہانہ حائرہ کونہ علی و فی قمانہ حیرام ضلع کراچی
علیہ گورنمنٹ ہسپتال فرنگہ 1990ء بمال 2 ماہ 9 دن قند نف ایچ جیبائی ایچ
نشانات خاص دائمی قابل شناخت حیرام ضلع کراچی

تعلیم	حالات	ملازمت		سابقہ		قریبی رشتہ داران	
		نام عہدہ تنخواہ	تاریخ ملازمت	عرصہ	تاریخ بھرتی	نام	سکونت
D-COM B-COM		از تا	سال	ماہ	دن	بیٹا بھائی دالہ دالہ	علی راجی سکونت

قریبی رشتہ داران جو گورنمنٹ ملازمت میں ہیں۔

نام کیا رشتہ ہے	کس عہدہ پر ہے	کس جگہ میں ہے	کس مقام پر ہے	کینہیت

میں مندرجہ بالا شخص / اشخاص با تفصیل اپنا وارث قرار دینا ہوں، یہ پیام مشغول تحریر کریں۔ دروازہ سا ()

میں اقرار کرتا ہوں کہ مندرجہ بالا امور ان جو میں درن کرائے ہیں درست ہیں۔

315-9094141

309941-300

25



CONFIDENTIAL
Application for Public Appointments
Government of K.P.

Hikam Khan

Farmer

Islam

07-02-1990

Alizai P/o Charpariza Peshawar

Abdul Ghulam Jilani

A/Bhan

Hanfia

Municipal Peshawar

0300-9309941, 0315-9094141

XT 4118481

(Please attach copy)

(Please attach copy)

Islam
Islam
Islam

Institution	Year
Govt. High School No 1, Pesh. City	2006
The Muslim College of Commerce	2008
Islamia Degree College Pesh.	2012

Name of Relative	Relationship	Occupation	Age (Approximate)	Address
Abdul Ghulam Jilani	Father	Farmer	55 Years	Alizai
Baz Durr Bibi	Mother	Horse maker	45 Years	"/
Maryam Hukam Khan	Wife	Student	25-4-1998	"/

ATTESTED

[Signature]

26

Employer Name	Period	Name & Address of Employer	year
Nil			

Name of the Union	Post Held	year
Nil		

Whether arrested, prosecuted or convicted in any case, terrorism or otherwise and restricted or extended if so, full particulars including date should be furnished.

Record of Reported Criminal Cases (if any)

Case No. & Date	Crime/Under Section	Police Station & District	Result of Investigation	Court Decision
Nil				

Name References with their Names & Addresses

Name & Particulars	Designation / Business	Address	Phone No.
Sheez Zada بی بی	Driver	All Zai	0303-8757006
Khanzada بی بی	Former	All Zai	0301-8895577
Firdos Khan بی بی زاد	Former	All Zai	0308-8404142

Received by (Name of recipient)

Place _____

Date _____

Year _____

ATTESTED

/

27

Information should be furnished in any case, terrorism or other activities of a political nature, including date, should be furnished.

The information given above is correct to the best of my knowledge and no member of my family is involved in any suspicious activity except as given in column No. 22 I may be furnished with further information

Hukam Khan

Ghulam Jilani



Handwritten signature of Ghulam Jilani.

Mr. Hukam Khan

S/O Ghulam Jilani
Ghulam Jilani

Handwritten Urdu text, likely a testimonial or statement, starting with 'میں تصدیق کرتا ہوں' (I confirm).

Handwritten Urdu text, likely a testimonial or statement, starting with 'میں تصدیق کرتا ہوں' (I confirm).

ASIR KHAN
16.8.2014
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HIDAYATULLAH
Sub-Editor of Debates
Provincial Assembly
Khyber Pakhtunkhwa
Handwritten signature and name of Hidayatullah.

ATTEST

<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>
<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>	<p>روزنامه</p>

۱۲۸

مستطاب حضرت مولانا محمد علی

محمد علی صاحب

28

دریغ علی

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
اندراج جدول برآورد															
اندراج جدول برآورد															
نمبر نشان	نام کجخانه قبلی باندی سابق	نام طرف باجیاه	نام مالک و اجخال	نام کاشته کار و اجخال	نمبر و نام کجیت و در قبیل و قسم زمین	مساحه یا ارگان	نمبر کجیت یا قبیل یا جدید	نام مالک و اجخال	نمبر و نام کجیت و در قبیل و قسم زمین	مساحه یا ارگان	قسمت یا دریا یا آبریز یا انتقال یا غیره در زمین و در زمین	نمبر و دریا یا خراج	نمبر و دریا یا خراج	نمبر و دریا یا خراج	نمبر و دریا یا خراج

Handwritten signature and stamp: IFTIKHAR KHAN, 20/11/08, Peshawar.

Handwritten signature and stamp: Aftab Khan, 20/11/08, Peshawar.

Handwritten signature and stamp: Aftab Khan, 20/11/08, Peshawar.

تیسرا افتتاح موضوعات در درجہ مہجرت 1911 تحصیل ضلع لہہ ورق نمبر 14

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1	اندرج جمعندی گاندیشیا آخری واقعہ امتحان کی ترتیب مطابق ہے	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ
1	اندرج جمعندی گاندیشیا آخری واقعہ امتحان کی ترتیب مطابق ہے	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ
1	اندرج جمعندی گاندیشیا آخری واقعہ امتحان کی ترتیب مطابق ہے	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ	اندرج جمعندی جواب تا کیم کیا بارگاہ

پڑائی کو چاہئے کہ اس وقت سے چاک کر کے اس وقت جمعندی کے ساتھ اس سے جلد بندی پر کے

Handwritten signature in a circle.

تفصیلاً موصوفہ شدہ حدسہ ایک فصلی وقفہ پشاور

سلسلہ	تاریخ	موصوفہ	رقبہ	محلہ	تعداد	ملاحظات	تعداد	ملاحظات
1	21/9/54	موصوفہ	14855	برسور	3	موصوفہ	3	موصوفہ
2	21/9/54	موصوفہ	14855	برسور	3	موصوفہ	3	موصوفہ
3	21/9/54	موصوفہ	14855	برسور	3	موصوفہ	3	موصوفہ
4	21/9/54	موصوفہ	14855	برسور	3	موصوفہ	3	موصوفہ
5	21/9/54	موصوفہ	14855	برسور	3	موصوفہ	3	موصوفہ
6	21/9/54	موصوفہ	14855	برسور	3	موصوفہ	3	موصوفہ
7	21/9/54	موصوفہ	14855	برسور	3	موصوفہ	3	موصوفہ
8	21/9/54	موصوفہ	14855	برسور	3	موصوفہ	3	موصوفہ
9	21/9/54	موصوفہ	14855	برسور	3	موصوفہ	3	موصوفہ
10	21/9/54	موصوفہ	14855	برسور	3	موصوفہ	3	موصوفہ



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service appeal No.555/2016.

Hukam Khan No.1298 Ex-Constable FRP HQs, Peshawar.....Appellant.

VERSUS

1. **Provincial Police Officer**
Khyber Pakhtunkhwa, Peshawar
2. **Commandant,**
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar
3. **Deputy Commandant FRP**
Khyber Pakhtunkhwa, Peshawar.....Respondent

WRITTEN REPLY ON BEHALF OF RESPONDENTS

PRELIMINARY OBJECTIONS

Respectfully sheweth

1. That the appeal is bād for mis-joinder and non-joinder of necessary parties.
2. That the appellant has no cause of action.
3. That the appellant has suppressed material facts from this Honorable Tribunal.
4. That no Constitutional or legal right of the appellant has been violated and therefore, the appellant cannot invoke the Constitution jurisdiction of this Honorable Tribunal.
5. That the appellant has not no locus standi and cause of action to file the instant appeal.
6. That the appellant has not come to this honorable court with clean hands.
7. That the appellant is estopped due to his own conduct to file the instant Service Appeal.
8. That this Honorable Court has no jurisdiction to entertain this Service Appeal.
9. That the appeal is unjustifiable, baseless, false frivolous and vexatious. Hence, the same is liable to be dismissed with the special compensatory cost in favour of respondents

On facts:-

1. Incorrect as per reliable sources the appellant is an Afghan national and succeeded in getting Pakistani CNIC, upon which got himself enlisted in police Department.
2. Correct to the extent that the appellant alongwith his family has been declared as Afghan national by the joint committee, comprising of ISI, SB, NADRA. He was issued charge sheet alongwith summary of allegations and Enquiry Officer was nominated to conduct enquiry into the mater. He submitted his reply of charge sheet but found unsatisfactory by the Enquiry Officer.
3. Incorrect that the Enquiry Officer after fulfilled the due codal formalities found the appellant as an Afghan national and submitted his findings. The Enquiry Officer narrated in his findings that according to the country rules, it is obligatory for every govt: servant must having Pakistani nationality and therefore, recommended for removal from service. (Copy of enquiry report attached as annexure "A")
4. Correct to the extent that after receiving the findings of Enquiry officer the Competent Authority served the appellant with final show cause notice to which he replied but his reply was found unsatisfactory by the Competent Authority.
5. Incorrect an opportunity of personal hearing was also provided to the appellant which he availed too, but failed to satisfy the Competent authority.
6. Correct to the extent that departmental appeal submitted by the appellant was thoroughly examined and rejected on sound ground.
7. The present appeal of the appellant is bad for law and worth to be dismissed.

GROUNDS

- A. Incorrect, the order of respondent No.2 is legally justified and in accordance with law.
- B. Incorrect that the appellant being Afghan national was succeeded in getting Pakistani CNIC prudently and subsequently the CINC of the appellant alongwith his family members blocked by the NADARA Authorities and as per report of joint committee i.e. ISI, SB, NADRA the appellant was found as an afghan national. On the allegation mentioned above the appellant dealt with proper departmentally as he was issued charge sheet and enquiry officer was nominated and after fulfillment of all the due codal formalities he was dismissed from service by the Competent Authority.
- C. Incorrect the joint verification committee has already been verified the appellant and his family, as Afghan national and the committee concerned ample opportunities for defence has already been provided to the appellant during the meeting but he failed bitterly to advance any proof which could corroborate his stance regarding Pakistani nationality. Moreover, the respondent No. 2 had also verified the status of the appellant from Special Branch vide office memo No.7518/EC, dated 04.09.2015 (annexure "B") and after departmental proceedings he was dismissed from service.
- D. Incorrect and the para has already been explained in the preceding paras.
- E. Incorrect the appellant alongwith his family has been declared as Afghan national by the joint committee, comprising of ISI, SB, NADRA. He was issued charge sheet alongwith summary of allegations and Enquiry Officer was nominated to conduct enquiry into the mater. The appellant submitted his reply of charge sheet which was found unsatisfactory by the Enquiry Officer. The Enquiry Officer found him guilty of the charges leveled against him and recommended for removal from service.
- F. Incorrect the appellant alongwith his family members being Afghan nationals succeeded in getting Pakistani CNIC prudently. Subsequently the CINC of the appellant and his family members blocked by the NADARA Authorities and as per report of joint committee i.e. ISI, SB & NADRA the appellant alongwith his family was found as an afghan national.
- G. Incorrect in order to verify the status of the appellant and his family members, a meeting of joint verification committee was held on 06.04.2015 at 10.00 AM which as duly attended by the representatives of different agencies who unanimously declared the appellant and his all family members as afghan national, because despite of various opportunity they could not produce any document or solid proof in their favours.(Copy of JVC minutes attached as annexure "C") Moreover, the Additional Inspector General of Police, Special Branch has also declared the appellant and his family members as afghan national vide his office memo No.2213/VRC, dated 17.09.2015.(Copy of the memo attached as annexure "D")
- H. Incorrect the Police station Khazana reported the appellant as unsuspected and unconvicted person.
- I. Incorrect mere burial in the grave yard of this land and property documents obtained through unfair means do not entitle a foreigner to claim Pakistani nationality.

- J. Incorrect the name of Atlas Khan is not included in the family members of appellant while the entire family members already declared as afghan national by the joint verification committee.
- K. Incorrect the department have no grudges against the appellant upon receiving information regarding his nationality enquiry was initiated against him hence; stance of the appellant is not plausible.
- L. Incorrect. The allegations are false and baseless as all the codal formalities were fulfilled during the course of departmental proceedings as explained in the preceding paras.
- M. Incorrect, and as explained in the preceding para "L" above
- N. The respondents may also be permitted to submit additional grounds at the time of arguments.

PRAYERS

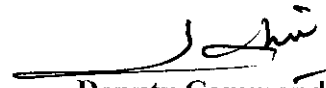
It is therefore, most humbly prayed that in the light of afore mentioned facts/submission the service appeal may kindly be dismissed with cost.



Provincial Police Officer
Khyber Pakhtunkhwa, Peshawar.
(Respondent No.1)



Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No.2)



Deputy Commandant
Frontier Reserve Police
Khyber Pakhtunkhwa Peshawar.
(Respondent No.3)

پولیس سٹیشن

صفا۔ عاکبہ! کوالہ جیٹی ڈائری مری 1314/P2
 صورت یہاں کہ مقدمہ والد جیٹی میں مقررہ یہ کہ لائٹنگ کالم خانہ ولد غلام حیدر
 افغان انسپل ہے جس کی روشنی میں کوالہ ڈائری مری 790/PA کو چارج کرنا
 سہی آف انکسٹی جاری کیا گیا اور من اپر دستخطی کو انٹورنٹ آفسر مقرر کیا گیا
 لیسٹہ انٹورنٹ لفرین نسیم چارج لائٹ لائٹنگ کالم خانہ جو PTS SWAT میں ہے
 ٹرینٹ تھا کو کوالہ سنڈل مری 1567/PA کو مقرر کیا گیا۔ مذکورہ کے بعد انکسٹی کو
 حوالہ 28/12 و دفتر حوالہ مقرر کر کے دست جوڈ چارج لائٹنگ و پولیس جو ہمراہ لے کر
 چارج لائٹنگ کی جواب دہی میں اپنے اوپر انچارج و دستبرد کرتے ہوئے اس بات کی وضاحت
 کی کہ لائٹنگ اسناد کے علاوہ 1960 میں جو نوع عالی نوع میں جائیداد کی خریداری ہے
 اور 1970 میں جائیداد کے منتقلات موجود ہے جس کی نوڈ گاچی ہمراہ لے کر
 علاوہ زمین خاندانی میرٹس میں 18 مارچ 1981 کو والد غلام حیدرانی ہمراہ 17 مارچ حوالہ خاندان
 جس پر دستبرد شدہ ہمراہ لے کر لیسٹہ انٹورنٹ مقدمہ والد جیٹی کو پیش کرنا
 رکھے ہوئے ہے۔ ایورٹ حاصل کرنے کے لیے کوالہ جیٹی مری 1558/PA ہر ایک دہری
 نکلیں جیٹی مری ہوئی جو لے کر اور قابل ملاحظہ ہے۔ جس نے کوالہ جیٹی مری
 1697/Security کو دو قسطہ ایورٹ منسلک لیسٹ کی جس میں لائٹنگ کالم خانہ خاندان
 17-12-15 افغان انسپل قرار پانے ہے۔ ایورٹ قابل ملاحظہ ہے۔ مذکورہ شخص کے لیے کوالہ جیٹی
 مری 1558/PA کو لے کر نادرہ مہاراج آباد پشاور مقرر ہوئے جو لے کر لیسٹ
 جس کی روشنی میں کوالہ ڈائری مری 1397/P2 کو پولیس مری جس میں مقررہ
 کہ مذکورہ کا ڈالر اور دیگر افراد افغان انسپل ہے۔ جیٹی مقدمہ ہمراہ لے کر
 اور قابل ملاحظہ ہے۔ علاوہ زمین خاکہ سیشنل پراجیکٹ ایورٹ کے مطابق عدالت
 افغان انسپل ہے۔ لیسٹ یا لیسٹ نامی قانون کے مطابق لائٹنگ مذکورہ سرکاری
 ملازمت کے لیے ریل نہیں ہے۔ ایورٹ انٹورنٹ لیسٹ مری پشاور ہے۔

پولیس سٹیشن

RESERVE INSPECTOR
FRP PESHAWAR RANGE
PESHAWAR
29-12-15

3339 - 9 (15) 1-12-2015

MINUTES OF THE MEETING OF THE DISTRICT LEVEL COMMITTEE
(REGARDING THE SECURITIZING OF SUSPECTED CASES
PERTAINING TO ALIEN REGISTRATIONS.

(4)

A meeting of District Level Committee regarding Suspected Cases pertaining to alien registration send by your good self vide No.334/SB, dated 28.08.2014, D.No.2492, dated 27.08.2014 was held on 06.04.2015 at 1000 hours in the office of DSP / HQrs: Police Line Peshawar under the chairmanship of the undersigned. The following representatives attended the meeting.

- | | |
|--------------------------------------------|--------|
| 1. Representative of ISI | Member |
| 2. Representative of I.B. | Member |
| 3. Representative of NADRA. | Member |
| 4. Representative of Afghan Commissionrate | Member |
| 5. Representatives of SB AGO Concerned | Member |

The chairman started discussion on the particulars of (1)Mr. Ghulam Jelani (2) Zair Ullah (3) Sher Zada s/o Muhammada jan (4) Mirza (5) Sarfaraz Khan (6) Khanzada s/o Ghulam Jelani (7) Pir Gul (8) Muhammad Norani s/o Khowani (9) Khowani (10) Aqal Meena (11) Bahadar Khan (12) Said Khan (13) Selalai (14) Muhammada Jan s/d/o Saleh Muhammad (15) Aman Ullah s/o Mewa Jan (16) Mewa Jan s/o Abdullah (17) Basri Bibi d/o Zardad Khan (18) Mehr Jan d/o Usman r/o Alizai Charpariza Peshawar. Their Names / particulars were conveyed to all the above mentioned representatives for scrutinizing the National Status. The detail / remarks of the verifying agencies are as under: -

ISI

Inspector Amir Khan reported that "Ground check conducted so far revealed that the family is as Afghan National, hence not cleared".

IB

Inspector Yahya Jan of IB stated in his report that "According to concerned AO the person case is Afghan National".

NADRA: -

AD / NADRA Asif Khan is absented from JVC Meeting

AGO W Road: -

AGO W Road Jehangir Khan stated in his report that "the individual's family is Afghan by-cast".

Action

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AFGHAN COMMISSIONERATE.

Inspector Salim Bacha of Afghan Commissionerate is absented from JVC Meeting.

Cases in which all the representatives of the committee approach to a unanimous decision are sent to NADRA as cleared while cases in which difference of opinion prevail over the identity of the individual are sent for further investigation to Political Agents of the tribal territories. Similarly those cases in which individuals are declared as Afghan nationals by the representatives of the committee are sent as not cleared.

From the foregoing circumstances and reports of the verifying agencies, I am of the opinion that the case of individual (1) Mr. Ghulam Jelani (2) Zair Ullah (3) Sher Zada s/o Muhammada Jan (4) Mirza (5) Sarfaraz Khan (6) Khanzada s/o Ghulam Jelani (7) Pir Gul (8) Muhammad Norani s/o Khowani (9) Khowani (10) Aqal Meena (11) Bahadar Khan (12) Said Khan (13) Selalai (14) Muhammada Jan s/d/o Saleh Muhammad (15) Aman Ullah s/o Mewa Jan (16) Mewa Jan s/o Abdullah (17) Basri Bibi d/o Zardad Khan (18) Mehr Jan d/o Usman declared as Afghan Nationals, hence not cleared.



CHAIRMAN
Inspector of Police,
CCP Peshawar.

30.11.15

No 3339/15

Dated 1.12.2015.

(enclosed 206 papers)

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"D"
2

7749
21-9-15

From: The Additional Inspector General of Police,
Special Branch, Khyber Pakhtunkhwa,
Peshawar.

To: The Commandant,
Frontier Reserve Police,
Khyber Pakhtunkhwa, Peshawar.

No. 2213 /VRC, dated Peshawar, the 17/9/2015.

Subject: VERIFICATION.

Memo: Please refer to your office letter No.7518/EC, dated 04.09.2015
on the above cited subject.

Secret enquiry was conducted through field staff of this unit
which revealed that the family of Constable Hukam Khan s/o Jailani r/o Ali zai PC
Charpariza, PS/Khazana, Peshawar had been migrated from Afghanistan in
1968/69 and remained residing in various places of Peshawar District. His
grandfather Mr. Salih Muhammad has purchased landed property in the area of
Khazana and also obtained NIC in 1974 bearing No.139-09-0103757. Reportedly,
he is Afghan National.

For Additional Inspector General of Police,
Special Branch Khyber Pakhtunkhwa Peshawar.

EC

COMMANDANT
Frontier Reserve Police,
Khyber Pakhtunkhwa,
Peshawar

From

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

Service Appeal No.555/2016

Hukam Khan

VS

Police Department.

.....
REJOINDER ON BEHALF OF APPELLANT
.....

RESPECTFULLY SHEWETH:

Preliminary Objections:

- (1-9) All objections raised by the respondents are incorrect. Rather the respondents are estopped to raise any objection due to their own conduct.

FACTS:

- 1 Incorrect. While para-1 of the appeal is correct as mentioned in the main appeal of the appellant. Moreover, the appellant is Pakistani national and the appellant also got I.D card No. 17301-1071848-7 and verification of national status of the appellant's family member was conducted by the Additional Inspector General of Police, Special Branch Head Quarter Branch Peshawar Dated 11.2.210 in which A.IG of police declared appellant family member as Pakistani National and also Nadra declared the Family of the appellant as Pakistani National in his Letter No. ECR 250-SVA/7-vol(21)/9291-9428/s.III Dated 28.5.2103 according to which the Appellant is also a Pakistani National. Furthermore, the appellant was appointed as Constable through NTS in CCP Peshawar on dated 30.12.2014 and later on transferred to FRP/HQrs Peshawar. The appellant performed his duty up to the entire satisfaction of his superiors and no complaint has been filed against him.
- 2 Incorrect. While para-2 of the appeal is correct as mentioned in the main appeal of the appellant.
- 3 Incorrect. While para-3 of the appeal is correct as mentioned in the main appeal of the appellant. Moreover, during inquiry the Ilaqa Nazim, Chaiman Nazim and also Elders of the Village gave statement that the appellant is belonging to "Village ALizai P/O Charpariza Thana Khazana Tehsil and District Peshawar". Furthermore, the verification was already done at the time of appointment of appellant and such the second verification was done with ulterior motives to remove the appellant and to appoint someone else in his place. Thus the whole action was

done with the malafide to create a post/vacancy for blue eyed person.

- 4 In first portion of reply, Para-4 of the appeal is admitted correct by the respondent. While rest of the contention of the respondent is incorrect, hence denied. Moreover as explained above.
- 5 Not replied as per para-5 of the appeal, hence denied. While para-5 of the appeal is correct as mentioned in the main appeal of the appellant.
- 6 In first portion of reply, Para-6 of the appeal is admitted correct by the respondent. While rest of the contention of the respondent is incorrect, hence denied. Moreover the para-6 of the appellant is correct as mentioned in the main appeal of the appellant.
- 7 Incorrect. The appellant have good cause of action and liable to be accepted on the following grounds of appeal as mentioned in the main appeal of the appellant.

GROUND:

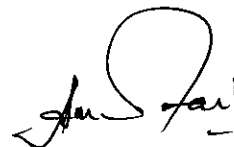
- A) Incorrect. While Para-A of the appeal is correct as mentioned in the main appeal of the appellant. Moreover, the impugned order dated 5.5.2016 and 9.3.2016 is against the law, facts and norms of justice and material on record, therefore liable to be set aside.
- B) Incorrect. While Para-B of the appeal is correct as mentioned in the main appeal of the appellant. Moreover, the appellant is Pakistani national and the appellant also got I.D card No. 17301-1071848-7 and verification of national status of the appellant's family member was conducted by the Additional Inspector General of Police, Special Branch Head Quarter Branch Peshawar Dated 11.2.210 in which A.IG of police declared appellant family member as Pakistani National and also Nadra declared the Family of the appellant as Pakistani National in his Letter No. ECR 250-SVA/7-vol(21)/9291-9428/s.III Dated 28.5.2103 according to which the Appellant is also a Pakistani National.
- C) Incorrect. While Para-C of the appeal is correct as mentioned in the main appeal of the appellant.
- D) Incorrect. While Para-D of the appeal is correct as mentioned in the main appeal of the appellant.

- E) Incorrect. While Para-E of the appeal is correct as mentioned in the main appeal of the appellant. As explained in above paras.
- F) Incorrect. While Para-F of the appeal is correct as mentioned in the main appeal of the appellant. Moreover, the appellant is Pakistani national according to statement of elders and as per report already attached with the main appeal as Annexure-J & K.
- G) Incorrect. While Para-G of the appeal is correct as mentioned in the main appeal of the appellant.
- H) Incorrect. While Para-H of the appeal is correct as mentioned in the main appeal of the appellant.
- I) Incorrect. While Para-I of the appeal is correct as mentioned in the main appeal of the appellant.
- J) Incorrect. While Para-J of the appeal is correct as mentioned in the main appeal of the appellant.
- K) Incorrect. While Para-K of the appeal is correct as mentioned in the main appeal of the appellant.
- L) Incorrect. While Para-L of the appeal is correct as mentioned in the main appeal of the appellant.
- M) Incorrect. While Para-M of the appeal is correct as mentioned in the main appeal of the appellant.
- N) Legal.

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

APPELLANT
Hukam Khan

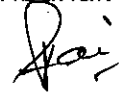
Through:



(M. ASIF YOUSAFZAI)
&
SYED NOMAN ALI BUKHARI
ADVOCATES, PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of rejoinder and appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from Hon'ble Tribunal.



DEPONENT

ATTESTED
Oath Commissioner
Zahoor Khan Advocate
Distt: Court Peshawar

21/12/2016



OFFICE OF THE
DEPUTY COMMISSIONER PESHAWAR

Address: Gate No 3, Near Judicial Complex Khyber Road Peshawar
Phone #: 091-9212305, Fax #: 091-9212303, www.dcpeshawar.gkp.pk



DISTRICT ADMINISTRATOR
PESHAWAR

No: 20447 /DC (P)/AG-II

Dated Pesh. The: 26/11/17

To

The Director General,
NADRA, Khyber Pakhtunkhwa,
Phase-V, Hayatabad, Peshawar.

SUBJECT:-- DISTRICT LEVEL COMMITTEE (DLC) - VERIFICATION CASES, BLOCKED CNIC'S.

Memo

Reference DLC meeting held on 26-10-2017 at 11:00 AM under the Chairmanship of the undersigned.

The following individuals appeared before the committee. Committee verified their respective documents from concerned authorities and hereby declared them as Pakistani Nationals.

S#	NAME	FATHER NAME	NIC #	REMARKS
1	Malik Gul Khan	Gul Nazar	17301-1265642-7	Cleared
2	Shabnam	Muhammad Ibrahim	17301-5443182-4	Cleared
3	Wali Muhammad	Saleh Muhammad	17301-1746602-3	Cleared
4	Hukam Khan Khan Zada	Ghulam Jilani	17301-1071848-7 17301-8557700-5	Cleared
5	Sarfaraz Khan	Said Ali (Late)	17301-4573655-3	Cleared
	Mirza		17301-2098510-7	
	Noorina		17301-1360533-6	
	Meemona		17301-7265343-0	
6	Ambreen	Meer Baksh	17301-2088493-6	Cleared
7	Sania Begum	Noor Muhammad	17301-1263044-0	Cleared
8	Sohrab	Umar Khitab	17301-2649995-3	Cleared
9	Mehreen Gul	Syed Gul Badshah	17301-0816788-6	Cleared
10	Sabira Bibi	Juma Gul	17301-1315773-0	Cleared
11	Rasheed Khan	Suliman Khel	17301-3938224-5	Cleared
12	Zia Ullah	Fazali Azeem	17301-6880496-7	Cleared
13	Khalid	Jehanger	17301-1273049-5	Cleared
14	Tasleem Eibi	Muhammad Jan	17301-1333297-6	Cleared
15	Deen Rehman	Arsala Khan	17301-0918398-1	Cleared
16	Basrat bibi	w/o Deen Rehman	17301-2174072-0	Cleared
17	Parveen Bibi	Alif Shah	17301-1793537-6	Cleared
18	Makeena Bibi	w/o Muhammad Shahab	17301-1222475-8	Cleared
19	Muhtamir Shah	Shah Zada Bacha	17101-0317106-3	Cleared
20	Imtiaz Muhammad	Noor Muhammad Khan	17301-6079173-1	Cleared

Rep: of NADRA
DLC Member

Rep: of IB
DLC Member

Rep: of ISI
DLC Member

Rep: of Police
DLC Member

Deputy Commissioner, Peshawar.
Chairman DLC

At: No. 20448-50 /DC (P)/AG-II.

Copy for information to the:

Secretary to Govt of Khyber Pakhtunkhwa, Home & T.A's Deptt Peshawar.
Deputy Commissioner, Peshawar Division, Peshawar.

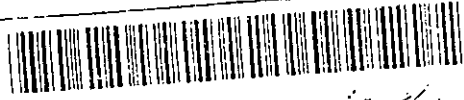
1 participants.

Deputy Commissioner,
Peshawar

KHYBER ROAD, GATE # 3, ATTACHED DEPARTMENT COMPLEX, PESHAWAR.
D:\AG-II\NADRA CASES\DG NADRA Letters.docx.doc

نادرا رجسٹریشن سینٹر
Bakhshi Pull

ٹوکن نمبر
41



ٹریکنگ آئی ڈی 503141094775

محمد اجان

درخواست برائے : تجدید شناختی کارڈ

درخواست کی تاریخ : 17-07-2017

شناختی کارڈ نمبر : 17301-6404988-3

تاریخ : 27-07-2017

وقت : 09 45 10 am

درخواست فیس : 75.00

سروس فیس : 0.00

کل رقم (روپیہ) : 75.00

مفوض سارٹین نادرا اسٹاف کے رہنے کی شکایات کی سہولت میں
مقررہ ذیل ویب سائٹ پر رجسٹر کریں۔

www.nadra.gov.pk/complaint

اپنی درخواست کی موجودہ صورتحال جاننے کیلئے ٹریکنگ آئی ڈی

8400 پر ایس ایم ایس کریں۔ (پہلے 2 روپے + ٹیکس) مزید

معلومات کیلئے ہیلپ لائن نمبر 051-111-786-100 یا

7000 پر رابطہ کریں



Tracking ID: 503141094775

Date: 27-07-2017 09:53:02 AM

حکومت پاکستان، وزارت داخلہ
نیشنل ڈیٹا بیس اینڈ رجسٹریشن اتھارٹی
کمپیوٹرائزڈ قومی شناختی کارڈ فارم

Token No: 41

محمد اجان

Bakhshi Pull

فارم کا مقصد:	تجدید شناختی کارڈ	فارم نمٹینس:	نارسل
2	سرور سے ریش:	فارم کے ڈاؤن لوڈ کے لئے یہاں	فیلی کے سربراہ کا شناختی کارڈ:
17301-6404988-3	شناختی کارڈ نمبر:	اور نمبر	پورا نام:
	شناختی کارڈ نمبر:	تعمیر و شناختی کارڈ	والد کا نام:
	شناختی کارڈ نمبر:	تاریخ	والد کا نام:
	شناختی کارڈ نمبر:		زوج کا نام:
	شناختی کارڈ نمبر:		سرپرست کا نام:
	شناختی کارڈ نمبر:		مستقل پتہ:
	شناختی کارڈ نمبر:		موجودہ پتہ:
11	قائم و شناختی علامت:		تاریخ پیدائش:
	کیا آپ جڑواں ہیں؟		جانے پیدائش:
13	جنس:		ازدواجی حیثیت:
15	مذہب:		شادی شدہ
17	تعلیم:		مادری زبان:
19	مقدوری:		تعلیم کی نوعیت:
21	بیٹے کی تفصیل:		پیشہ:
23	بلڈ گروپ:		موجودہ رہائش:
25	دوٹ کا اندراج:		سرورسز:
	بچے کا در خواست		بچوں کے کوائف:
	پیدائش کا مطلع ملک		بچے کا پورا نام اور شناختی کارڈ نمبر
	جنس		والد کا نام اور شناختی کارڈ نمبر
	تاریخ پیدائش		والد کا نام اور شناختی کارڈ نمبر
	مقدوری		بچے کا پورا نام اور شناختی کارڈ نمبر

F. Jaw
F. Saad

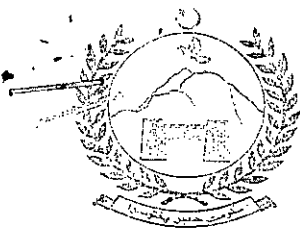
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دفتری استعمال کیلئے	ریاست جوں تکبیر کا شرعی ہونے کی صورت:	کوئی نہیں
فارم جمع کرنے والی ہادی	درخواست دہندہ کے دائیں ہاتھ کے انگوٹھے کا نشان	درخواست دہندہ کے بائیں ہاتھ کے انگوٹھے کا نشان
آفس انچارج	فارم کی تصدیق اور توثیق گزشتہ افسران، پنج نمائندے، نمبر دار اور خوبی ریشہ دار کو کئے گئے۔	فارم جمع کرنے کی تاریخ 20-Aug-2017 ہے۔ آخری تاریخ گزر جانے کی صورت میں دوبارہ درخواست جمع نہیں کر دینی ہوگی
تصدیق کنندہ کی سر	تصدیق کنندہ کے دستخط اور تاریخ	فون نمبر
فارم جمع کرانے کی تاریخ:	تصدیق کنندہ کی سر	فارم جمع کرنے کی تاریخ: 20-Aug-2017
		کوئی کوائف کی تبدیلی کی وجہ سے آپ کو نیا کارڈ ملے گا۔





OFFICE OF THE
DEPUTY COMMISSIONER PESHAWAR

Address: Gate No 3, Near Judicial Complex Khyber Road Peshawar

Phone #: 091-9212305, Fax #: 091-9212303, www.dcoeshawar.gkp.pk



DISTRICT ADMINISTRATOR
PESHAWAR

No: 13391 /DC (P)/AG-II

Dated Pesh. The: 12/12/17

To

The Director General,
NADRA, Khyber Pakhtunkhwa,
Phase-V, Hayatabad, Peshawar.

SUBJECT: DISTRICT LEVEL COMMITTEE (DLC) – VERIFICATION CASES, BLOCKED
CNIC'S.

Memo

Reference DLC meeting held on 13-12-2017 at 11:00 AM under the Chairmanship of the undersigned.

The following individuals appeared before the committee. Committee verified their respective documents from concerned authorities and hereby forward along with copies of relevant clearance / verification reports for further action.

S-NO	NAME	FATHER NAME	NIC # / CRC No	REMARKS
1	Ajlal Ahmad	Muhammad Jamai Khan	CRC NO:100160-08-0000305-06 /17301-2297901-5	Cleared
2	Arsala Khan	Safdar Khan	17301-1449526-9	Cleared
3	Khista Gul	Samar Gul	17301-1074410-3	Cleared
4	Habib ul Haq	Fazli Haq	17301-35021357	Cleared
5	Noor Muhammad	Tor Gul	17301-1367965-1	Cleared
6	Halima	w/c Sadiq Ullah	17301-3179107-0	Cleared
7	Muhammad Shahid	Niaz Muhammad	17301-2472437-1	Cleared
8	Fahim	Wakeel Khan	17301-1329527-7	
9	Shakeel	Wakeel Khan	17301-1329525-1	Cleared
10	Izzat bibi	Wakieel Khan	17301-6045809-2	
11	Gul Rahman	Malang	17301-1683444-8	Cleared
12	Sir Buland	Zeenat-ul-allah	17301-1369354-3	Cleared
13	Muhammad Gul	Gul Aman	17301-5843245-9	Cleared
14	Gul Badshah	Afzal Khan	17301-1562057-1	Cleared
15	Perveen	Abdul Hameed	17301-1097657-0	Cleared
16	Murad Gul	Abdur Rasheed	17301-8176163-9	Cleared
17	Sardar Khan	Gulab Khan	17301-132404-7	Cleared
18	Muhammada Jan	Saleh Muhammad	17301-6404988-3	Cleared
19	Sheer Rehman	Haji Sandan Khan	17301-1414769-3	Cleared
20	Bahader / Aslam	Gaidai	17301-0431687-1	Cleared
21	Kiramar	Bakhtavar	17301-3656685-1	Cleared
22	Abdul Wali Khan	Gulzar Khan	17301-2507672-7	Cleared
23	Gul Rehman	Ghulam Hussain	17301-3952880-1	Cleared
24	Zahir Khan	Gul Dast Khan	17301-1418187-1	Cleared



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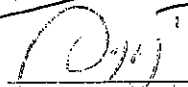
DISTRICT ADMINISTRATOR
PESHAWAR

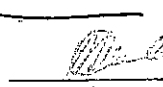


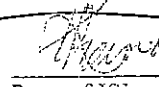
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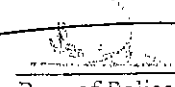
Dated Pesh. The: 14/10/17

25	Gula Jan	Muhammad Jan	17301-1619059-3	Cleared
26	Awal Gul	Sakhi Jan	17301-4213239-9	Cleared
27	Abdullah	Rehmatullah	17301-1641297-1	Cleared
28	Abdul Qayum	Muhammad Ali	17301-1238561-1	Cleared
29	Fazli Hakeem	Sayed Hakeem	17301-1347048-1	Cleared
30	Lala Gul	Syed Abdul Satar	17301-8877435-5	Rejected (Afghan National)
31	Shahid Khan	Abdullah	17301-6423581-9	Rejected (Afghan National)
32	Asad Ali	Syed Anwar		Rejected (Afghan National)
33	Haji Watan	Mir Afzal	17301-1250217-1	Rejected (Afghan National)


Rep: of NADRA
DLC Member


Rep: of IB
DLC Member


Rep: of ISI
DLC Member

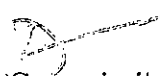

Rep: of Police
DLC Member

Deputy Commissioner, Peshawar.
Chairman DLC

Endst: No. 13392-4/DC(P)AG-II

Copy for information to the:

1. Secretary to Govt of Khyber Pakhtunkhwa, Home & T.A's Deptt Peshawar.
2. Commissioner, Peshawar Division, Peshawar.
3. All participants.


Deputy Commissioner,
Peshawar.



OFFICE OF THE
DEPUTY COMMISSIONER PESHAWAR

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Phone #: 091-9212305. Fax #: 091-9212303, www.dcpeshawar.gkp.pk



DISTRICT ADMINIST
PESHAWAR

No: 14699 /DC (P)/AG-II

Dated Pesh. The: 22/12/17

To

The Director General,
NADRA, Khyber Pakhtunkhwa,
Phase-V, Hayatabad, Peshawar.

SUBJECT: DISTRICT LEVEL COMMITTEE (DLC) – VERIFICATION CASES, BLOCKED
CNIC'S.

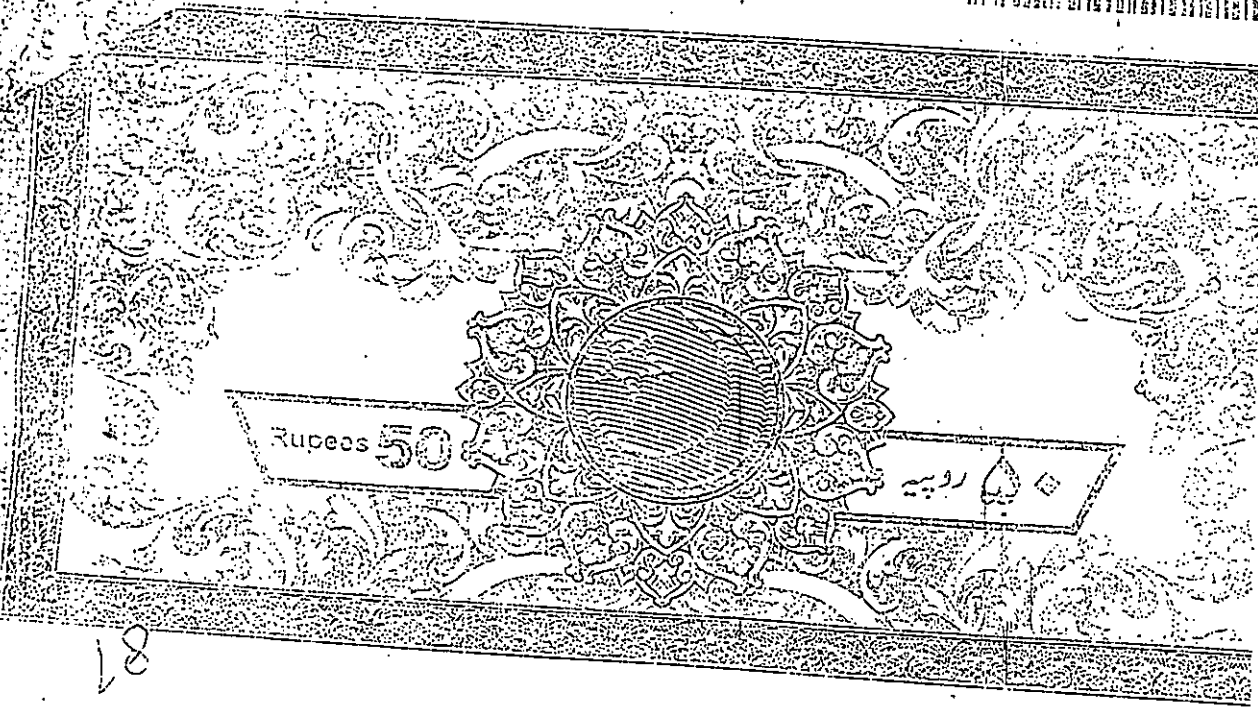
Memo

Enclosed please find herewith the stamp paper (In original) provided by the following persons for favor of further necessary action at your end.

S #	Name	Father Name
1	Muhammad Shahid	Niaz Muhammad
2	Sardar Khan	Gulab Khan
3	Muhammuda Jan	Saleh Muhammad
4	Sher Rahman	Haji Sandan Khan
5	Bahadur	Gaidai
6	Zahir Khan	Gul Dast Khan
7	Shahab-ud-din	Abdul Hanan
8	Musafar Khan	Alla Khan
9	Arsala Khan	Safdar Khan
10	Muhammad Gul	Gul Aman Khan

Deputy Commissioner,
Peshawar. Dec

17301-9290037-0



18

بیان حلفی

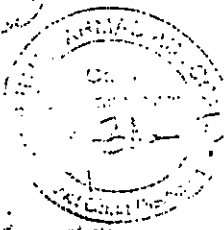
مکتبہ سہمی محمد اجان ولد صالح محمد (مرحوم) ساکنان ٹلی زئی، ڈاکخانہ چار پریزہ، تحصیل و ضلع پشاور کا ہیں۔ حلفاً اقرار کرتا ہوں کہ بتاوا خاندان مسترد ہونے میں انفرادی پر مشتمل ہے۔ جن کے نام اور شناختی کارڈ بھی مسترد ہونے میں ہیں۔

نمبر شمار	نام	ولدیت اشوبہ	شناختی کارڈ نمبر	ایڈریس اپتہ
1-	محمد اجان	صالح محمد (مرحوم)	17301-6404988-3	ٹلی زئی ڈاکخانہ چار پریزہ، تحصیل و ضلع پشاور۔
2- ✓	غلام جیلانی (بیٹا)	محمد اجان (والد)	17301-4563175-1	ٹلی زئی ڈاکخانہ چار پریزہ، تحصیل و ضلع پشاور۔
3-	ظہیر اللہ (بیٹا)	محمد اجان (والد)	17301-7033934-9	ٹلی زئی ڈاکخانہ چار پریزہ، تحصیل و ضلع پشاور۔
4-	شیر زادہ (بیٹا)	محمد اجان (والد)	17301-4787860-3	ٹلی زئی ڈاکخانہ چار پریزہ، تحصیل و ضلع پشاور۔
5-	زرینہ بی بی (بیٹی)	محمد اجان (والد)	17301-1189431-2	ٹلی زئی ڈاکخانہ چار پریزہ، تحصیل و ضلع پشاور۔
6-	گن شے بی بی (مرحومہ بیٹی)	محمد اجان (والد)	17301-9290037-0	ٹلی زئی ڈاکخانہ چار پریزہ، تحصیل و ضلع پشاور۔

محمد اجان ولد صالح محمد (مرحوم) ساکنان ٹلی زئی، ڈاکخانہ چار پریزہ، تحصیل و ضلع پشاور

شناختی کارڈ نمبر: 17301-6404988-3
ذاتی نمبر: 03159094141
03009309941

ATTESTED



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No 2621 /ST

Dated 07/12/2017

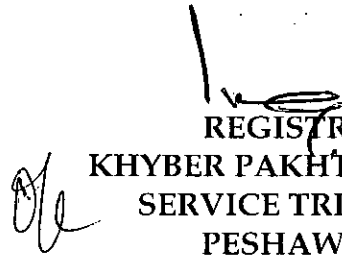
To

The Deputy Commandant, Frontier Reserve Police,
Government of Khyber Pakhtunkhwa,
Peshawar.

Subject: **JUDGEMENT/ORDER IN APPEAL NO. 555/16, MR. HUKAM KHAN.**

I am directed to forward herewith a certified copy of Judgment/order dated 04/12/2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.