

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
CAMP COURT, ABBOTTABAD.

Appeal No. 525/2019

Date of institution ... 25.04.2019  
Date of decision .... 20.06.2019

Uzair LHC No. 271 presently serving in Lower Kohistan Pattan  
Headquarter. ... (Appellant)

Versus

Inspector General of Police Khyber Pakhtunkhwa Peshawar and four  
others. ... (Respondents)

Present

Mr. Mamoonur Rasheed,  
Advocate ... For appellant.

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MR. HAMID FAROOQ DURRANI, ... CHAIRMAN

JUDGMENT

HAMID FAROOQ DURRANI, CHAIRMAN:-

1. Service Appeal No. 526/2019 (Farid Versus Inspector General of Police, Khyber Pakhtunkhwa Peshawar and others) is also proposed to be disposed of hereby as grievance and prayer of both the appellants is the same. The prayer in appeals is reproduced herein below:-

*"Allowing this appeal, order No. 12657-62 dated 31.12.2018 be declared void of any legal force and appellants be treated as were never transferred against their will and under the circumstances, such order is politically motivated."*

2. I have heard learned counsel for the appellants who mainly argued that the impugned transfers were politically motivated and the consent of the appellants was not obtained before the passing of order in issue.

3. The record shows that, on 31.12.2018, the appellant while posted in District Police of Hazara Region, was transferred and posted to Frontier Reserve Police Hazara Region through the order on behalf of Inspector General of Police, Khyber Pakhtunkhwa, Peshawar. They submitted their respective departmental appeals impugning the order of transfer which remained un-responded. It was noted in the appeals that the appellants were transferred from one place to another more than once in short span of time. That, the transfer of appellants was made in order to accommodate new appointees in the District Police. It is noticeable that the transfer of the appellants which was impugned was within the District Battagram. Learned counsel for the appellant, when required to refer to any rules which were violated by the respondents while transferring the appellants, was unable to do the needful. Instead, it was reiterated that the consent of appellants was not taken by the respondents before transferring them to FRP.

The Police Force is a disciplined organ of Provincial Government and is responsible for maintenance of law and order. The transfer of appellants appears to be normal act of administrative functions of the competent authority. The obtaining of option before transfer of an

official is totally alien to the rules/practice of department as well as the public interest.

4. Finding no merits in the appeals in hand, the same are dismissed in limine. File ne consigned to the record room.



(HAMID FAROOQ DURRANI)  
Chairman  
Camp Court, Abbottabad.


ANNOUNCED  
20.06.2019

## Form- A

## FORM OF ORDER SHEET

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

Case No. 525/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/04/2019	<p>The appeal of Mr. Muhammad Uzair presented today by Mr. Mamoon-ur-Rasheed 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 <u>25/4/19</u></p>
2-	<u>30-4-19</u>	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>20-6-19</u></p> <p style="text-align: right;">CHAIRMAN </p>

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

Appeal No. 525 /2019

LHC Muhammad Uzair No. 271.

... APPELLANT

**VERSUS**

Inspector General of Police (KPK) & Others.

... RESPONDENTS

**SERVICE APPEAL**




**INDEX**

S#	Description of Documents	Annexure	Page No.
1	Service Appeal alongwith Verification and Affidavit		1 to 4A
2	Addresses of the Parties		5
3	Advertisement		6
4	Merit Copies	"A" & "B"	7 to 9
5	Documents	"C" & "D"	10 to 12
6	Departmental Appeal	"E"	13 to 15
7	Other Documents		16 to 17
8	Wakaltnama		

  
APPELLANT

Through

  
(Mamoon ur Rasheed)  
Advocate High Court  
Abbottabad

Dated: \_\_\_\_\_/2019

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUN KHAWA PESHAWAR**

Appeal No 525 /2019

LHC Uzair No 271, ~~2019~~ Presently

serving in Kohistan .....APPELLANT

*Lower Kohistan Rawan Head Quarter.*

Khyber Pakhtunkhwa  
Service Tribunal

VERSUS

Diary No. 660

Dated 25/4/2019

1. Inspector General Police Khyber Pakhtunkhwa Peshawar.
2. Deputy inspector general Police Hazara Abbottabad
3. R.P.O Regional Police officer Hazara Abbottabad.
4. AIG, Assistant Inspector General Establishment Khyber  
Pakhtunkhwa Peshawar.
5. District Police officers District Battagram .....RESPONDENTS

**SERVICE APPEAL UNDER**  
**SECTION 4 SERVICES TRIBUNAL**  
**ACT 1974 AGAINST THE ORDER**  
**NO; 12657-62 DATED 31-12-2018**  
**BE STRUCK DOWN AS THE**  
**RESULT OF VICTAMISATION,**  
**MISSUSE OF AUTHORITY,**  
**ILLEGALE AB ANITIO AGAINST**  
**NATURAL JUSTICE, IN SHORP**  
**CONFLICT WITH RULE OF**  
**EQUITY, AND POSTING POLICY**  
**AS WELL.**

Filed to-day

*[Signature]*  
Registrar

25/4/19

**PRAYER:-**

***Allowing this appeal, ordered No 12657-62 dated 31/12/2018 be declared void of any legal force and appellant be treated as was never transferred against their will and under the circumstances, such order is politically motivated.***

***Respectfully Sheweth,***

This appeal proceeds, on the following main facts and legal points;

**FACTS:**

1. That, appellant is serving as LHC, in the Police department on the strength of District Battagram.
2. That, in response to an advertisement, and consequent upon successful completion of NTS proceedings, after as per observing all the Codal formalities as many as 9 appointments were made purely on merits Copies are.....**ANNEXURE "A" & "B"**.
3. That, in hap hazard manner & in violation of all the codal instruction, direction on the same date (31-12-2018) 13 more were promoted and 18 other appointment were made from the waiting list.
4. That, in order to create vacant situation 13 transfers from District Battagram were made to

FRP 100 % on political motivated grounds, and it included petitioner, hence this petition documents are ..... **ANNEXURE "C" "D"**

5. That, appellant, filed departmental appeal on 14-01-2019 which till now is not disposed of either way, hence this appeal.

Copy is ..... **ANNEXURE "E"**

**GROUND:**

Appellant beg to solicit as under;

- a. That, in the short span of time, appellant was posted in P.S from Police line, then in the court of learned Session's Judge and yet again to F.R.P.
- b. That, while making / issuing impugned order no consent and willingness is sought out, nor the order is made based on any criteria, formula whatsoever it may be.
- c. That, once no list either based on willingness formula or so prepared by the concern D.P.O, orders made by name by respondent 3 bespeaks volume, that there is some hanky-panky a fishy fishy.
- d. That, neither worthy respondent has asked for a list, nor such list is provided in black and white nor, such list is present anywhere on record, but on 28/12/2018 vacant situation with reference to numerical No's is shown and on 31/12/2018, fresh appointments, have been made, and also/ transfers are made, thus on one hand to make way for the entry of the beloved and on the other hand to kick out the targeted.





- e. That, no formula is set out, nor any criteria is laid down that why and how these II persons were found fit to be placed on the strength of FRP and how the DIG office came to know about the availability, suitability and adjustability of these II persons by name & not in terms of numbers.
- f. That, on this single score, the order passed is tainted with malafide in contravention of principle of neural justice, contrary to the rule of equity, in violation of mandates of the constitution.
- g. That, such acts or actions of the authorities is misuse of authority without lawful effects & illegal ab initio.

**Allowing this appeal, ordered No 12657-62 dated 31/12/2018 be declared void of any legal force and appellant be treated as was never transferred against their will and under the circumstances, such order is politically motivated.**

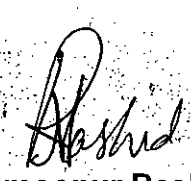
Dated:- \_\_\_\_\_ 2019

Through:

  
**APPELLANT**  
  
**(Mamoonur Rasheed)**  
(Advocate High Court)  
**Abbottabad**

**VERIFICATION:-**

*Verified that the contents of the instant **appeal** are true and correct to the best of my knowledge and information furnished by my client and that nothing has been concealed from this Hon'ble Court.*

  
**(Mamoonur Rasheed)**  
(Advocate High Court)  
**Abbottabad**

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

Appeal No. \_\_\_\_\_ /2019

LHC Muhammad Uzair No. 271.

... APPELLANT

VERSUS

Inspector General of Police (KPK) & Others.

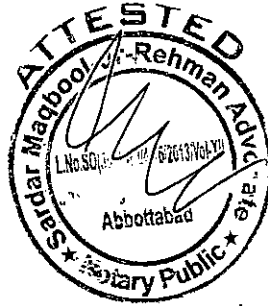
... RESPONDENTS

**SERVICE APPEAL**

**AFFIDAVIT**

I, Mr. Muhammad Uzair (LHC) S/O Umar Khatab caste Swati, resident of Rashang, Tehsil Allai District Battagram, solemnly affirms and declare on oath that the contents of the titled service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon' able court.

Attested  
Rashed



DEPONENT

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUN KHAWA PESHAWAR**

Appeal No \_\_\_\_\_ /2019

LHC Uzair .....APPELLANT

**VERSUS**

Inspector General Police & others.....RESPONDENTS

**SERVICE APPEAL**


**ADDRESSES OF THE PARTIES**

The addresses of the parties are as under;

1. LHC Uzair No 271, presently posted in .....APPELLANT
1. Inspector General Police Khyber Pakhtunkhwa Peshawar.
2. Deputy inspector general Police Hazara Abbottabad
3. R.P.O Regional Police officer Hazara Abbottabad.
4. AIG, Assistant Inspector General Establishment Khyber Pakhtunkhwa Peshawar.
5. District Police officers District Battagram.....RESPONDENTS

  
APPELLANT

Through:

  
(Mamoonur Rasheed)  
(Advocate High Court)  
Abbottabad

Dated:- \_\_\_\_\_ /2019





# ORDER

NEXURE

A

In continuation of this office order Endst: No. 12469-73 dated 26.12.2018 and Endst: No. 12534-38 dated 31.12.2018.

The Following 05 ETEA qualified candidates on waiting list of this district are hereby appointed as Constable in BPS-07 (Rs: 10990-610-29290) against the existing vacancies, subject to their medical fitness, verification of academic documents, domicile certificates and character with immediate effect. Their appointments are purely on temporary basis. They are allotted constabulary numbers as noted against each.

S#	Name	Father Name	ETEA R/No.	Village	Police Station	Constab. number allotted
1.	Bakht Nawaz Khan	Ghulam Mustafa	02048	Malkal Gall	Shamlai	05
2.	Abdus Sattar	Khushal Khan	02126	Rashang	Banna	33
3.	Abdur Rehman	Miskeen	02143	Bansair	Shamlai	87
4.	Nasr Ullah	Hafeez Ullah	02285	Chanjal	Chanjal	100
5.	Tariq Aziz	Muhammad Zahid Shah	01358	Bateela	Banna	126

Similarly the remaining 04 candidates are placed at waiting list due to non availability of seats as per their ETEA seniority. They will be enlisted as constable on the availability of vacancies till 31.12.2018.

S#	Name	Father Name	NTS R/No.	Village	Police Station
1.	Lal Badshah	Sherin Rehman	01394	Kassai	Banna
2.	Syed Wasim Ullah Shah	Aman Syed Sherazi	01623	Aughaz Banda	Chanjal
3.	Abu Bakkar	Qari Abdul Jalil	01895	Battagram	Battagram
4.	Syed Naseeb Shah	Noor Muhammad Shah	02169	Nowshera	Battagram

District Police Officer,  
Battagram.

*Asad*  
Attested

No. 12589-43 /Dated Battagram the 31-12 /2018

Copies submitted to the:-

1. Inspector General of Police Officer, Khyber Pakhtunkhwa
2. Regional Police Officer, Hazara Region Abbottabad.
3. District Accounts Officer, Battagram.
4. Pay Officer, DPO Office, Battagram.
5. SRC, DPC Office Battagram.

District Police Officer,  
Battagram.

Tele: Office No. 0997-310036

Fax No. 0997-311616

E-mail: batpolice@yahoo.co



# ORDER

## ANNEXURE

### B

In continuation of this office order Endst: No. 12469-73 dated 26.12.2018.

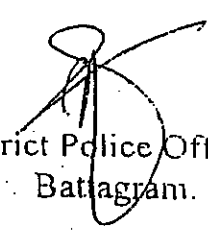
The Following 13 ETEA qualified candidates on waiting list of this district are hereby appointed as Constable in BPS-07 (Rs. 10990-610-29290) against the existing vacancies, subject to their medical fitness, verification of academic documents, domicile certificates and character with immediate effect. Their appointments are purely on temporary basis. They are allotted constabulary numbers as noted against each.

S#	Name	Father Name	ETEA R/No.	Village	Police Station	Constable number allotted
1.	Muhammad Azam Khan	Jan Muhammad Khan	01739	Bansair	Shamlai	130
2.	Sardar Shah	Yousaf Shah	01788	Doonga	Shamlai	155
3.	Ejaz Ur Rehman	Alamgeer	02093	Nika Shakhail	Shamlai	152
4.	Moin Ullah	Muhammad Amcer Khan	01231	Khair Abad	Kuzahanda	367
5.	Shah Murad Ahmad	Syed Alcem Shah	01512	Bateela	Banna	271
6.	Mushtaq Ahmad	Nazir Muhammad Khan	01735	Kander	Battagram	31
7.	Abdur Rehman	Sardar Shah	02458	Sakargah	Pazang	400
8.	Nefaz Ahmad	Haq Nawaz Khan	01969 3	Batkool	Banna	02
9.	Kifayat Ullah	Hazrat Yousaf	02302	Barian	Kuzahanda	117
10.	Nizam Ud Din	Shoaib Ud Din	02474	Bateela	Banna	123
11.	Walced Ahmad	Ihsan Ullah	01265	Qala	Battagram	492
12.	Liaqat Ali	Naz Muhammad	01641	Bahda	Battagram	475
13.	Muhammad Bilal	Nazir Muhammad	01700	Kander	Battagram	230

*Approved  
Hasid*

Similarly the remaining 09 candidates are placed at waiting list due to non availability of seats as per their ETEA seniority. They will be enlisted as constable on the availability of vacancies till 31.12.2018.

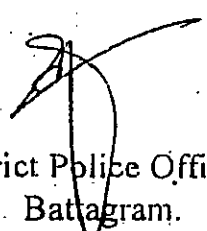
S#	Name	Father Name	NIS R/No.	Village	Police Station
1.	Bakht Nawaz Khan	Ghulam Mustafa	02048	Malkal Galli	Shamlai
2.	Abdis Sattar	Khushtal Khan	02126	Rashang	Banna
3.	Abdur Rehman	Miskeen	02143	Bansair	Shamlai
4.	Nasr Ullah	Hafeez Ullah	02285	Chanjal	Chanjal
5.	Tariq Aziz	Muhammad Zahid Shah	01388	Bateela	Banna
6.	Lal Badshah	Sherin Rehman	01394	Kassai	Banna
7.	Syed Wascom Ullah Shah	Aman Syed Sherazi	01623	Aughaz Banda	Chanjal
8.	Abu Bakkar	Qari Abdul Jalil	01895	Battagram	Battagram
9.	Syed Naseeb Shah	Noor Muhammad Shah	02169	Nowshera	Battagram

  
 District Police Officer  
 Battagram.

No. 12534-38 /Dated Battagram the 31-12 /2018

Copies submitted to the:-

1. Inspector General of Police Officer, Khyber PakhtunKhwā, Peshawar.
2. Regional Police Officer, Hazara Region Abbottabad.
3. District Accounts Officer, Battagram.
4. Pay Officer, DPO Office, Battagram.
5. SRC, DPO Office Battagram.

  
 District Police Officer  
 Battagram.

*Assisted*  
*Rashid*

31/12 2018 16:57 FAX 0919210927

PFO RPK PESHAWAR

ANNEXURE



21794  
31-12-18

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
CENTRAL POLICE OFFICE,  
PESHAWAR

**ORDER**

The following lower subordinates of different Districts of Hazara Region are noted against their names are hereby transferred and posted to FRP Hazara Range with immediate effect:-

S#	Rank, Name & Belt No.	Present Posting
1.	Head Constable Shah Baz Khan No. 78	District Haripur
2.	Head Constable Anwar Khan No. 188	-do-
3.	Head Constable Jahanzab Khan No. 202	-do-
4.	Head Constable Naseer Khan No. 438	-do-
5.	Head Constable Zubeir Khan No. 539	-do-
6.	Head Constable Muhammad Imran No. 701	-do-
7.	Constable Umar Khan No. 243	-do-
8.	Constable Arshad Khan No. 303	-do-
9.	Constable Mahmood Ur Rahman No. 488	-do-
10.	Constable Umar Hayat Khan No. 648	-do-
11.	Constable Muhammad Yousof No. 698	-do-
12.	Head Constable Ayaz No. 167	District Manshera
13.	Head Constable Khalil Ur Rahman No. 718	-do-
14.	Head Constable Sajid No. 500	-do-
15.	Head Constable Saif Ur Rahman No. 789	-do-
16.	Head Constable Saleem No. 306	-do-
17.	Head Constable Nazir No. 208	-do-
18.	LHC Gulasib No. 861	-do-
19.	Constable Amir No. 430	-do-
20.	Head Constable Nawaz No. 130	District Battagram
21.	Head Constable Farid No. 185	-do-
22.	Head Constable Rasool No. 152	-do-
23.	Constable Akhtar Muhammad No. 387	-do-
24.	LHC Usair No. 271	-do-
25.	Constable Ihsan Muhammad No. 31	-do-
26.	Constable Khair Shah No. 371	-do-
27.	Constable Khalil Ur Rahman No. 02	-do-
28.	Constable Nazir No. 117	-do-
29.	Constable Abdul Wakeel No. 123	-do-
30.	LHC Gulasib No. 492	-do-
31.	Constable Abdullah No. 475	-do-

Attested  
Ashid

Ops Haripur Manshera  
and Battagram/EC  
for information

No. 32487-89/EC  
dt-31-12-18

(SADIQ BALOCH) Psp  
AIG/Establishment  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

No. 12657-62/E-IV dated Peshawar the 31/12/2018

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

1. Regional Police Officer, Hazara Region w/r to his Memo No. 32326/E dated 28.12.2018
2. Commandant FRP Khyber Pakhtunkhwa, Peshawar.
3. District Police Officers, Haripur, Manshera & Battagram.

Imrul  
RPO/Hazara  
31/12





INVENTORY  
D

Subject

SUBJECT PROJECTS

No.	Name, Rank & No.	Service Roll	Post	FC
1	HC Muhammad, et al			
2	HC Farid No. 166			
3	HC M. Rafique No. 152			
4	HC Azam No. 271			
5	HC Gushatup Khan No. 492			
6	FC Akhtar Muhammad No. 367			
7	FC Ihsan Muhammad No. 31			
8	FC Imran Ullah No. 377			
9	FC Khairur Rehman No. 12			
10	FC Nazir No. 117			
11	FC Abdul Wakeel No. 123			
12	FC Abdullah No. 475			

Handwritten notes in the left margin.

No 2125, /SRC/SP 9, 07/01/19.

District Police Officer,  
Batalagram

Series record 4 Fajri...  
one returned...  
that security...  
and series...  
series...  
returned...  
early date...

Signature and stamp of the District Police Officer.

12

# OFFICE OF THE DISTRICT POLICE OFFICER BATTAGRAM

Ph# (0997 310036 (0997311617

Fax No -0997-1311611

E.mail [batpolice@yahoo.com](mailto:batpolice@yahoo.com)

No 49 /SRC Dated Battagram 02-01-2019

To

The Sr, Superintend of Police  
FRP Hazara Region Abbottabad.

Subject; **SERVICE DOCUMENTS**

Memorandum;

Please refer to worthy inspector General of Police Khyber Pakhtunkhwa

Order Ends; No 12657-62/E-IV dt; 31-12-2018.

The following service record in respect of the following Head Constables and constables are sent herewith for your office record, which may be acknowledged please.

S/No.	Name. Rank & No	Service Roll	Fuji Missal	LPC
1	HC Muhammad Nawaz No. 130	1	1	1
2	HC Farid No. 155	1	1	1
3	HC M.Rafique No. 152	1	1	1
4	LHC Uzair No.271	1	1	1
5	LHC Gushtaship Khan No.492	1	1	1
6	FC Akhtar Muhammad No. 367	1	1	1
7	FC Ihsan Muhamamad No.31	1	1	1
8	FC Imran Ullah No.377	1	1	1
9	FC Khairur Rehman No.02	1	1	1
10	FC Nazir No. 117	1	1	1
11	FC Abdul Wakeel	1	1	1
12	FC Abdullah No.475	1	1	1

No 2125 /SRC/FRP 07/01/19

*Attested*  
*Asad*

**District Police Officer,  
Battagram**

بخدمت صاحب محترم -  
19/2/2019 کو سٹیٹس کے ذریعے

Through Proper Channel

13

ANNEXURE

DE

انتہائی اہمیت سے تدارک کے لئے کی جاتی ہے۔  
میں کوئی پروا اور اپنی ڈیوٹی بنانے کی خوش آہنگی اور اپنا انداز سے انجام دیتا ہوں اور  
کہا کہ میں اس عملی تعمیر یافتہ ہے اور اسٹیشن اپنے سینٹر افیئر سے اچھی کارکردگی پر خوش  
سرگشتگی کی حالت میں اور صاحب محترم سے دو مرتبہ اچھی کارکردگی  
پر خوش سرگشتگی سے بھی حاصل کیے۔ دوران ملازمت اپنے سینٹر افیئر کے حکم  
کے تحت اس سے سرپرستیم کیا اور آئندہ بھی کرتا رہوں گا۔

Attested  
[Signature]

17/2/2018 کو G.D پولیس برٹن ٹیڈم کی تفریق کی گئی  
جہاں اسٹیشن تقریباً 3 ماہ ملازمت کی۔ جو فوراً 12/1/2018 کو اسٹیشن کا تبادلہ G.D تھا  
ملازمت سے نااہل کر دیا گیا۔ اس کے بعد اسٹیشن کا تبادلہ کر دیا گیا  
کا تبادلہ تقریباً 17/1/18 انجام دیا۔ اسی طرح فوراً 01/01/2019 کو اسٹیشن کا تبادلہ ضلع ٹیڈم  
سے FRP ہزارہ ریجمنٹ کیا گیا جو اسٹیشن اپنے سینٹر افیئر کے احکامات کو مدنظر  
رہتے ہوئے تسلیم کیا اور مزید 9 روز ملازمت 11/1/2019 کو حاضری کی رپورٹ کی

میں کوئی پروا اور اپنی ڈیوٹی بنانے کی خوش آہنگی اور اپنا انداز سے انجام دیتا ہوں اور  
کہا کہ میں اس عملی تعمیر یافتہ ہے اور اسٹیشن اپنے سینٹر افیئر سے اچھی کارکردگی پر خوش  
سرگشتگی کی حالت میں اور صاحب محترم سے دو مرتبہ اچھی کارکردگی  
پر خوش سرگشتگی سے بھی حاصل کیے۔ دوران ملازمت اپنے سینٹر افیئر کے حکم  
کے تحت اس سے سرپرستیم کیا اور آئندہ بھی کرتا رہوں گا۔

FRP کے ساتھ اپنی سرپرستیم  
10 ماہ اس سے سرپرستیم سے تبادلہ کیا گیا تاکہ جو اہلکاران  
Beneficiary کے یعنی جن کو Promote کیا گیا تھا تو ان کو FRP میں  
تبدیل کرتے۔ اگر ضلع ہزارہ میں کنڈال کی 10 خانی آسانیاں تھیں

NR

اور ETEA کی کزن والے انہی لوگوں کو FRP میں کوئی کیا جاتا، یا جاسکتا تھا۔ اگر  
افسوس اور صبراً افسوسوں میں سے صبراً اور واضح طور پر بیان ہوتا ہے کم میں سائل کا  
تبادلہ سب سے اشر، رسوخ پر کیا گیا ہے۔

یہ بھی درست ہے کہ کم میں سائل اگر بہا جاتا یا دیگر کوئی ملز قانونی کاموں میں دلوشیا یا  
جاتا تو بھی کم میں سائل کا تبادلہ ہو جاتا تو سائل کو کوئی دیکھ نہ ہوتا۔ یا سائل کو  
دیوانی مقدم یا خودداری مقدم زیر سماعت عدالت ہوتا، یا کم میں سائل عدالتی طرز حاکم  
پاکی ہوتا، یا کم میں سائل کو کھراخ Complaints وغیرہ تھی جو افسران  
بہر بیان کیے در سر تھا تو کم میں سائل تبدیل کیا جاتا تو سائل کو دیکھ نہ ہوتا

یہ بھی درست ہے کہ سائل کی کیا کیے کی قیل تنخواہ سے اپنے گھر کا خرچہ کرنا ہے اور کم  
سائل نے نیشنل بینک آف پاکستان اسلام آباد سے مبلغ 650000 روپے لے کر ہر ایک ہزار رو  
ایڈوانس سلی کی گئی ہے۔ کم میں سائل نے اپنے لیے گھر کا پلاٹ خریدا جو اب سائل کی  
نقد تنخواہ 18000 روپے بعد لٹوٹی ملی ہے۔ کم میں سائل نے اپنے گھر کا خرچہ اور کم کی  
تعلیم وغیرہ کرنا ہے۔ سائل اکلوتا بچا ہے اور سائل کا والدین کا خرچہ 90 سال کا ہو  
جو بیمار ہے اور زیر علاج ہے سائل سے زہنی گرفت، Tension کا شمار  
کرا جو Depression نامی سائل کو مزید زہنی دباؤ اور پریشانی سے دوچار  
کر دیا ہے

Addressed

یہ بھی تصدیق ہے کہ سائل خاندان کو بہتر کرنے کے لیے ہے اور سائل کی بھی خاندان  
طی کوئی سب سے اہل ہے اور پولیس ورک کو سمجھنے کا شوق رکھتا ہے جو سائل  
کا آغاز سروس ہے کم میں سائل کو بھی کام سے لگائیں، تھیں، بند کر  
وغیرہ کام سمجھ سکتے۔ اگر کم میں سائل FRP میں رہا تو سائل کو پولیس ورک  
سے پر علم رہے گا۔

زور کا حق نہ سمجھنے کی وجہ سے حکم کو لیں گے یا عدالت پر ہاتھ پائی بنے گا: اور اس کا مستقبل تاریک بنام جو جگہ میں زندگی کا باعث بنے گا

بذریعہ درخواست استقامت حاصل کی جاتی ہے اس کے ساتھ ساتھ کوئی بھی باہم کشیدگی کے  
میں نظر اور اس کے Fundamental right کی خاطر  
اور حالت پر مبنی کا ثبوت اور اس کے ساتھ ساتھ اس کا ثبوت دیتے ہو  
میں اس کے ساتھ ساتھ FRP جو کہ ریج سے ضلع بنام کے  
سائل تا حدت دعا کو رہتا ہے۔ اس کو اس کے ساتھ ساتھ

Attested  
Rashed

الحارثی

14/2/2018  
10/01/2018  
@31111111111111111111

4778/CHC/2018  
تعمیراتی ڈیپارٹمنٹ لاہور  
ضلع لاہور  
10/01/2018

Li forwarded.

15 16  
OFFICE OF THE  
COMMANDANT FRONTIER RESERVE POLICE  
KHYBER PAKHTUNKHWA, PESHAWAR  
Email:comdtfrpoffical@gmail.com  
Ph No 091-9214114 fax No 091-9212602  
No.12454-84/EC Dated 07/12/2018

To, (1) All Regional Police Officers,  
in Khyber Pakhtunkhwa.

(2) All District Police Officers.  
in Khyber Pakhtunkhwa.

Subject: TRANSFER OF LOWERS SUBORDINATES.

Memo: It is communicated that a lot of officials are willing for transfer from FRP Khyberpakhtunkhwa to their domicile Districts due to which great deficiency will be occurred an FRP Platoons. This deficiency will be recouped if such number of official would transfer from District Police to FRP.

It is therefor, Requested to please intimate the names of officials who are willing for transfer from your respective Districts to FRP, So is to approach CPO to issue there transfer/Posting orders in this regard.

COMMANDANT,  
Frontier Reserve Police,  
Khyber Pakhtunkhwa,  
Peshawar.

*Musted*  
*Musted*



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
CENTRAL POLICE OFFICE,  
PESHAWAR

ORDER

No. 3665 /REPATRIATION:- Constable Akhtar Muhammad No. 4714 of District Police Battagram presently serving in FRP Hazara Range is hereby repatriated to his parent District Battagram with immediate effect.

No. 3666 /TRANSFER/POSTING:- Chan Zeb No. 165 of District Police Battagram is hereby transferred and posted to FRP Hazara Range as substitute of the above named Constable with immediate effect.

(SADIQ BALOCH) P.S.R  
AIG/Establishment

For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar

No. 3667 /E-IV

dated Peshawar the 03/04 /2019

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

1. Commandant FRP Khyber Pakhtunkhwa, Peshawar w/r to his office letter No. 1794/EC, dated 21.02.2019.
2. District Police Officer, Battagram w/r to his office letter No. 1366/SRC, dated: 08.03.2019.

Accepted  
Asad