

Cost of Rs. 2000/- received in Service Appeal No. 1737/2023

Titled Zafran Ullah vs Police

in the office of Assistant Registrar, Vide Order 12-02-2024,

submitted on 12/02/2024.


12/02/24

Assistant Registrar
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.1737 /2023.


Ex-Constable Zafran Ullah No. 4542 of CCP Peshawar..... **Appellant.**

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others.. **Respondents.**

I n d e x

S.NO	DOCUMENTS	ANNEXURE	PAGES
1	Reply		1 to 3
2	Affidavit		4
3	Authority		5
4	Copy of list	A	6
5	Charge Sheet	B	7
6	Statement of allegations	C	8
7	Enquiry Report	D	9
8	FSCN	E	10



**DSP/Legal,
CCP, Peshawar.**

*one copy handed over
to appellant.*

17-02-2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.**Service Appeal No.1737 /2023.**Ex-Constable Zafran Ullah No. 4542 of CCP Peshawar..... **Appellant.****VERSUS**Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others.. **Respondents.****REPLY BY RESPONDENTS NO. 1, 2&3.****Respectfully Sheweth:-****Khyber Pakhtunkhwa
Service Tribunal**Diary No. 11088Dated 12-02-2024**PRELIMINARY OBJECTIONS:-**

1. That the appeal is badly barred by law & limitation.
2. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
3. That the appellant has not come to Hon'ble Tribunal with clean hands.
4. That the appellant has no cause of action and locus standi to file the instant appeal.
5. That the appellant is estopped by his own conduct to file the instant appeal.
6. That the appellant has concealed the material facts from Hon'ble Tribunal.
7. That the appeal is not maintainable being devoid of any merit.

REPLY ON FACTS:-

1. Incorrect. The appellant was appointed as constable in the year 2013 in the respondent department. However, performance of the appellant during service was not up to the mark and earned 08 bad entries on different occasions during his short service. The appellant being member of disciplined force, committed gross misconduct by giving secret information to criminals, hence his act brought a bad name for the entire force. (Copy of list is annexed as A)
2. Para for the appellant to prove. However, Para clearly reflects that there is a fair process in the respondent department that in case of showing honesty and dedication in the line of duty an individual is encouraged by giving him commendation certificate and in case of commission of misconduct, the defaulter is penalized under the relevant law/rules. The instant case is an example of fairness and impartiality.
3. Incorrect. The appellant while posted to District Security Branch, Peshawar was proceeded departmentally on the charges of his involvement in the objectionable activities related to gravest misconduct of having nexus with organized criminals and drug paddlers. Similarly, he was reportedly patronizing his illegal activities with the intention for personal gain. In this regard, he was issued charge sheet with statement of allegations vide No.643 E/PA dated 10.09.2021 to which he replied, but his reply was found unsatisfactory. (Copy of charge sheet, statement of allegations are annexed as B,C)
4. Incorrect. SP Cantt Peshawar was appointed as Enquiry Officer to dig out the real facts. During the course of Enquiry, he was provided full opportunity of personal hearing and also recorded his statement by giving him opportunity of verbally cross examination, but the appellant failed to rebut the charges leveled against him. The Enquiry Officer after thorough probe into the matter, established his links with narcotics dealers and sharing sensitive

information with them vide No.2794/PA dated 16.11.2021.(copy of enquiry report is annexed as D)

- 5. .Incorrect. The Competent Authority after receipt of the findings, issued him final show cause notice vide No.2662/PA dated 19.11.2021, which he replied, but failed to defend himself, hence he was awarded major punishment of removal from service under Police Rules 1975 amended 2014 vide order No.933-38/PA dated 07.12.2021.(Copy of FSCN is annexed as E)
- 6. Incorrect. Proper departmental enquiry was conducted as per law/rules, wherein the enquiry officer found the appellant guilty of the charges beyond any shadow of doubt. The whole enquiry was conducted purely on merit. The appellant was provided full opportunity of defense, but the appellant failed to defend himself. After fulfilling all the codal formalities he was awarded the major punishment.
- 7. Incorrect. The appellant filed departmental appeal, which was thoroughly processed and an ample opportunity of hearing was provided to the appellant by appellate authority but the appellant failed to defend himself with plausible/justifiable grounds, hence his appeal was rejected/filed vide No.968-75/PA dated 25.03.2022. The appellant then preferred revision petition before the Revision Board, which after due consideration was also filed/rejected because the charges leveled against him were proved beyond any shadow of doubt.
- 8. That appeal of the appellant being devoid of merits and limitation may be dismissed on the following grounds.

REPLY ON GROUNDS:-

- A. Incorrect. The punishment orders passed by the competent authority are just legal, lawful and according to norms of natural justice hence, liable to be upheld.
- B. Incorrect. Proper departmental enquiry was conducted against him. During the course of enquiry, the appellant failed to rebut the charges and the enquiry officer after thorough probe into the matter found the appellant guilty of the charges.
- C. Incorrect. During the course of enquiry, the enquiry officer called the appellant alongwith concerned officers and was verbally cross examined him. During enquiry, the enquiry officer found the appellant involved in the objectionable activities related to gravest misconduct of having nexus with drug dealers and leakage of information due to which narcotics dealers easily escaped themselves from lawful arrest during raid. Therefore, he was rightly awarded major punishment.
- D. Incorrect. The appellant was arrested in the case vide FIR No.319 dated 09.09.2021 u/s 9D,13 KPK Act 15AA,109,149,468,471,420 PS Jamrud on the basis of statement of the co-accused Najeeb Ullah u/s 164 Cr.P.C, wherein, the accused namely Najeeb Ullah contended that the appellant used to facilitate him in the business of contraband. Further, discharging in a criminal case would not ipso facto lead to exonerate Civil Servant in departmental proceedings.
- E. Incorrect. Para already explained in the preceding paras. However, discharging in a criminal case would not lead to exoneration of a civil servant in departmental proceedings. Proper departmental enquiry was conducted against him to unearth the real facts and Enquiry

Officer found the appellant guilty by committing misconduct within the meanings of Rules ibid, hence rightly awarded him major punishment.

- F. Incorrect already explained in detail in the above para. Further, the prime duty of police is to protect life, property and liberty of citizens, preserve and promote public peace instead he committed gross misconduct by indulging himself in moral turpitude offences which speaks volume of his immoral personality and unlikely of becoming a good police officer. After fulfilling all codal formalities the charges leveled against him were proved, hence the appellant was penalized.
- G. Incorrect. The appellant was treated as per law/rules. The appellant was provided full opportunity of defense/ personal hearing, but he failed to prove his innocence. As per Khyber Pakhtunkhwa ESTA code, appellant shall be penalized as per quantum of misconduct committed by him and he was rightly punished as per his guilt.
- H. That the replying respondents also seek permission of this Hon'ble Tribunal to raise additional grounds at the time of arguments.

PRAYERS:-

Keeping in view the above stated facts & reasons it is, most humbly prayed that the appeal of the appellant being devoid of merits and limitation, may kindly be dismissed with costs please.

(Lt Cdr ® Kashif Aftab Ahmad Abbasi)PSP
Senior Superintendent of Police,
Operations, Peshawar.
(Respondent No.3)

(Syed Ashfaq Anwar)PSP
Capital City Police Officer,
Peshawar.
(Respondent No.2)

(Dr. Muhammad Akhtar Abbas)PSP
DIG/Legal, CPO
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No.01)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.1737 /2023.

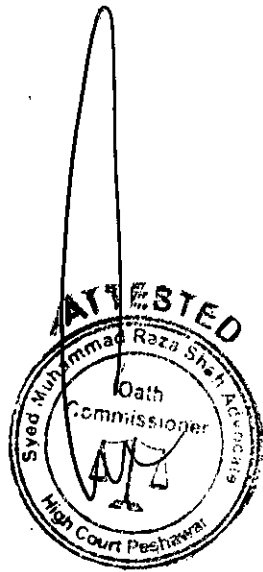
Ex-Constable Zafran Ullah No. 4542 of CCP Peshawar..... **Appellant.**

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others.. **Respondents.**

AFFIDAVIT.

We respondents No. 1, 2 & 3 do hereby solemnly affirm and declare that the contents of the written reply are true and correct to the best of our knowledge and belief and nothing has concealed/kept secret from this Hon'ble Tribunal. It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense have been struck off.



(Lt Cdr ® Kashif Aftab Ahmad Abbasi)PSP
Senior-Superintendent of Police,
Operations, Peshawar.
(Respondent No.3)

(Syed Ashfaq Anwar)PSP
Capital City Police Officer,
Peshawar.
(Respondent No.2)

(Dr. Muhammad Akhtar Abbas)PSP
DIG/Legal, CPO
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No.01)

5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No.1737 /2023.

Ex-Constable Zafran Ullah No. 4542 of CCP Peshawar..... **Appellant.**

VERSUS

Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar and others.. **Respondents.**

AUTHORITY.

I, **Capital City Police Officer, Peshawar**, hereby authorize **Mr.Inam Ullah** DSP legal of Capital City Police, Peshawar to attend the Hon'ble Court and submit written reply, statement and affidavit required for the defense of above service appeal on behalf of respondent department.

(Lt Cdr @ Kashif Aftab Ahmad Abbasi)PSP
Senior Superintendent of Police,
Operations, Peshawar.
(Respondent No.3)

(Syed Ashfaq Anwar)PSP
Capital City Police Officer,
Peshawar.
(Respondent No.2)

(Dr. Muhammad Akhtar Abbas)PSP
DIG/Legal, CPO
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No.01)

1. Name of Official

MIAN ZAFRAN ULLAH NO.4542 S/O

A 6

MIAN SABIR ULLAH

R/O

Mian Gojar PS Daudzai Distt: Peshawar

2. Date of Birth

03-10-1993

3. Date of enlistment

10-09-2013

4. Education

10th

5. Courses Passed

Nil

6. Total qualifying service

08 years 07 months & 16 days

7. Good Entries

01

Bad Entries (L.W.O Pay, E/Drill & Warning)

01 05 days leave without pay vide OB No.1807 dt:21-05-2013

02 Awarded 01 day E/drill vide OB No.3633 dt:28-10-2013

03 Awarded 01 day E/drill vide OB No.4307 dt:31-12-2013

04 Awarded 01 day E/drill vide OB No.4204 dt:20-12-2013

05 07 days leave without pay vide OB No.4194 dt: 20-12-2013

06 Awarded 01 day E/drill vide OB No.895 dt:19-03-2014

07 Awarded 01 day E/drill vide OB No.3277 dt:31-08-2015

08 Awarded 02 day E/drill vide OB No.3062 dt:13-08-201

Minor Punishment

Nil

Major Punishmen

Nil

09. Punishment (Current)

- Awarded Major punishment Removal from service vide order Endst: No.2933-38/PA, dt:07-12-2021 by SSP/Operation Peshawar.

Total leave at his credit

392

Availed leaves

Nil

Balance

392

PA 21/02

Handwritten signature

WICCPO

CRC 3/02

CHARGE SHEET

B ①

1. Whereas I, Yasir Afridi PSP, SSP/Operations Peshawar, am satisfied that a Formal Enquiry as contemplated by Police Rules 1975 is necessary & expedient in the subject case against **Constable Zufran Ullah No. 4542 of District Security Branch District Peshawar.**

2. And, whereas, I am of the view that the allegations if established would call for major/minor penalty, as defined in Rule 3 of the aforesaid Rules.

3. Now therefore, as required by Rule 6 (1) (a) & (b) of the said Rules, I, Yasir Afridi PSP, SSP Operations, Peshawar hereby charge you **Constable Zufran Ullah No. 4542 of District Security Branch District Peshawar** under Rule 5 (4) of the Police Rules 1975 on the basis of following allegations/grounds:

It has been learnt from reliable sources that you while posted in District Security Branch, Peshawar were hand in gloves with organized criminals and drug paddlers similarly you were reportedly patronizing your illegal activities with the intention for personal gain. Being a member of the disciplined force, your above act comes within the ambit of corruption and is highly objectionable and render you liable for disciplinary proceedings under Police (Efficiency & Disciplinary) Rules, 1975.

4. I hereby direct you further under Rule 6 (1) (b) of the said Rules to put forth written defence within 7 days of the receipt of this Charge Sheet to the Enquiry Officer, as to why action should not be taken against you and also stating at the same time whether you desire to be heard in person.

5. In case your reply is not received within the specific period to the Enquiry Officer, it shall be presumed that you have no defence to offer and ex-parte action will be taken against you.

20

YASIR AFRIDI PSP
Senior Superintendent of Police,
(Operations) Peshawar

No. 2643 E/PA dated Peshawar the 10/09/2021.

Shirani Put
For Process

R
R

جناب عالی!

بمحوالہ چارج شیٹ نمبری 643 E/PA مورخہ 21/09/10 معروض خدمت ہوں۔

کہ من ڈسٹرکٹ سکریٹری براج میں تعینات ہے۔ اور اس میں تعیناتی کے دوران تھانہ کے سطح پر ایک اور بعض اوقات ایک کانسٹیبل کو کئی تھانے بھی حوالہ کیے جاتے ہیں۔ جہاں سے وقوعہ کے متعلق انفارمیشن کیساتھ ایڈوائس انفارمیشن آرگنائزڈ کرائمز کے متعلق سوریسز سے بذریعہ موبائل فون کال، واٹس ایپ اور دیگر کمیونیکیشن ذرائع سے رابطہ کیے جاتے ہیں۔ ایک تھانہ یا بعض اوقات کئی تھانوں کی انفارمیشن کیلئے بروقت پہنچنا مشکل ہوتا ہے۔ جس کے لیے فون و دیگر کمیونیکیشن ذرائع استعمال کیے جاتے ہیں۔ چونکہ سیاسی اور مذہبی جلوس اور وقوعہ کے متعلق انفارمیشن تو ہر کسی سے حاصل کی جاسکتی ہے۔ لیکن آرگنائزڈ کرائمز منشیات فروش، اختیاریوں کے متعلق معلومات، سنگٹروں کے متعلق معلومات اور قمار بازوں اور دیگر حساس معلومات ان سے وابستہ سوریسز سے ہی حاصل کیے جاسکتے ہیں۔ اور جس سے صرف بذریعہ فون، واٹس ایپ وغیرہ رابطہ ممکن ہے اور من نے اس سلسلے میں آرگنائزڈ کرائمز کے متعلق سوریسز سے ہی معلومات حاصل کر کے افسران بالا کے ذریعہ برو پیش کر کے جس پر تھانوں کے ذریعے افسران بالا کی اطلاعات کے تحت کارروائیاں ہو چکی ہیں۔

جناب عالی! من نے صرف ٹھیکے کے نیک نامی اور اپنے ضلع کو منشیات پاک کرنے کیلئے سوریسز سے رابطہ کیے ہیں۔ اس کے علاوہ من سائل نے نہ تو منشیات فروش سے ذاتی فائدہ سے رابطہ کیے ہیں اور نہ ہی منشیات فروشوں کو فائدہ پہنچانے کیلئے اپنے اختیارات کا استعمال کیا ہے۔ اور نہ کسی منشیات فروش کو کہیں سفارش کی ہے اور نہ ہی ان کو کہیں فائدہ پہنچانے کی کوشش کی ہے۔

من سائل حلفیہ طور پر بیان دیتا ہوں کہ مندرجہ بالا حقائق بالکل درست اور ایمانداری کے

تحت ہے۔

العارض

آپ کا مخلص زعفران اللہ کا نسیبیل بیلٹ نمبر 4542

STATEMENT OF ALLEGATIONS

1. I, Yasir Afridi PSP, SSP/Operations Peshawar as competent authority, am of the opinion that Constable Zufran Ullah No. 4542 of District Security Branch District Peshawar has rendered himself liable to be proceeded against departmentally as he has committed the following acts/omission within the meaning of section 03 of the Khyber Pakhtunkhwa Police Rules, 1975.

It has been learnt from reliable sources that he while posted in District Security Branch, Peshawar were hand in gloves with organized criminals and drug paddlers similarly he was reportedly patronizing his illegal activities with the intention for personal gain. Being a member of the disciplined force, his above act comes within the ambit of corruption and is highly objectionable and render himself liable for disciplinary proceedings under Police (Efficiency & Disciplinary) Rules, 1975.

2. For the purpose of scrutinizing the conduct of afore said police official in the said episode with reference to the above allegations SP Cantt. is appointed as Enquiry Officer under Rule 5 (4) of Police Rules 1975.

3. The Enquiry Officer shall in-accordance with the provision of the Police Rules (1975), provide reasonable opportunity of hearing to the accused Official and make recommendations as to punish or other action to be taken against the accused official.

2
YASIR AFRIDI PSP
Senior Superintendent of Police,
(Operations) Peshawar

No. 643 E/PA, dated Peshawar the

10/09/2021

FINDING U/R 6(5) OF POLICE RULES 1975, (AMENDED 2014)
AGAINST FC ZAFRAN NO. 4542

The enquiry in hand was referred to this office to ascertain the misconduct, committed by FC Zafran No. 4542 vide order of enquiry No. 643/E/PA dated 10.09.2021.

FC Zafran ullah No. 4542 was issued charge sheet and statement of allegations, which contained following allegations:

- It has been learnt from reliable sources that he while posted in District Security Branch, Peshawar were hand in gloves with organized criminals drug peddlers. Similarly he was reportedly patronizing his illegal activities with the intention for personal gain. Being a member of the disciplined force, his above act comes within the ambit of corruption and is highly objectionable and render himself liable for disciplinary proceedings under police (Efficiency & Disciplinary) Rules, 1975.

ENQUIRY PROCEEDINGS:

To inquire the matter and unearth the real facts, undersigned called the following persons and recorded their statements and cross examined them as well.

1. FC Zafran No. 4542
 2. SI Zia Ullah (I.O of case FIR No. 319/2021 u/s 9-DCNSA/13 KPK/15-AA/109/419/468/471 PS Jamrud).
 3. SI Zulfiqar Khan (ASHO PS Jamrud)
- Moreover, audio recordings provided by ASHO Zulfiqar PS Jamrud were also examined.

STATEMENT OF FC ZAFRAN NO. 4542

Constable Zafran said in his statement that the allegations against him are baseless and there is no truth in it but the accused in case FIR No. 319/2021 u/s 9-DCNSA/13 KPK/15-AA/109/419/468/471 PS Jamrud was his informer and on his information he identified several drug dealers and its diary has been provided to the senior officers in time and action was taken against many drug dealers on that information. For this reason, he tried to justify his contacts with the accused.

(Signature)

STATEMENT OF SI ZULFIQAR ASHO PS JAMRUD

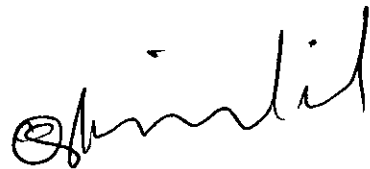
SI Zulfiqar stated that on 09.09.2021 accused Najib was arrested with a motorcar and 10 grams of heroin was recovered from his possession. The accused was interrogated and another 6 kg of heroin and equipment for producing drugs was recovered from his Hujra.

During search, three mobile phones were recovered from the possession of the accused. There was a CDR in the WhatsApp chat of accused Najceb. He was asked about the CDR that who sent it to which he replied that it was sent by his friend Zafran who is a constable in the police department. Further checking of the mobile phone found many links of the accused with Zafran. The accused also had audio recordings in his mobile phone which informed him about the police raids. Based on the evidence before IO, Constable Zafran was also charged under Section 109 PPC. Constable Zafran managed BBA from the honorable court. Constable Zafran has been found to be the facilitator of the above accused.

STATEMENT OF SI ZIA ULLAH KHAN I.O

SI Zia Ullah Khan stated that on 09.09.2021 accused Najib was arrested by ASHO PS Jamrud with a motorcar and 10 grams of heroin was recovered from his possession. The accused was interrogated and another 6 kg of heroin and equipment for producing drugs recovered from his Hujra.

During search, three mobile phones were recovered from the possession of the accused. There was a CDR in the WhatsApp chat of accused Najceb. He was asked about the CDR that who sent it to which he replied that it was sent by his friend Zafran who is a constable in the police department. Further checking of the mobile phone found many links of the accused with Zafran. The accused also had audio recordings in his mobile phone which informed him about the police raids. Based on the evidence before IO, Constable Zafran was also charged under Section 109 PPC. Constable Zafran managed BBA from the honorable court.



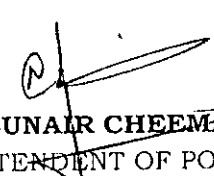
FINDINGS

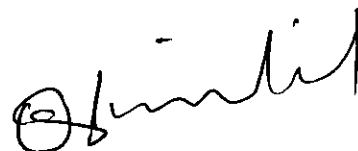
After going through the statement, verbally cross examining the alleged constable and enquiring into the matter, the undersigned reached following conclusion;

1. The presence of voice messages as well as CDR in the WhatsApp chat with the accused confirm constable Zafran links with narcotics dealer, Najeeb.
2. The audio messages shown by IO of case prove that Zafran had close links with drug dealers and informed them about police action in a timely manner.
3. The allegations made against Constable Zafran are correct and there is ample evidence to suggest that indeed he had established links with narcotics dealer Najeeb and shared sensitive information with him thus aiding in criminal activity.

RECOMMENDATION

Keeping in view the aforementioned findings, FC Zafran No. 4542 is hereby recommended for major punishment.


AHMED ZUNAIR CHEEMA (PSP)
SUPERINTENDENT OF POLICE,
CANTT PESHAWAR





OFFICE OF THE
SENIOR: SUPERINTENDENT OF POLICE,
(OPERATIONS),
PESHAWAR
Phone. 091-9213054

E

No. 2662 /PA


Dated Peshawar the 19/11, 2021

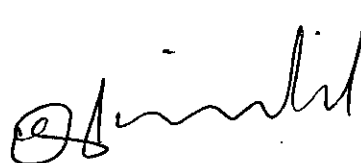
FINAL SHOW CAUSE NOTICE
(Under Police Disciplinary Rules, 1975)

1. I, Senior Superintendent of Police, Operations, Peshawar as competent authority, under the Police disciplinary Rules 1975, do hereby serve you **Constable Zafran No. 4542 while posted to DSB District Peshawar** as follows:-
2. (i) That consequent upon the completion of enquiry committee conducted against you by CCP Peshawar, who found you guilty of the charges for which you were given the opportunity of personal hearing.

(ii) Ongoing through the findings and recommendations of the inquiry officer, the material on record and other connected papers including your defense before the said officers; I am satisfied that you have committed the follow misconducts:

You have been **found guilty** of the charges already communicated to you vide this office charge sheet bearing No. 643/E/PA dated 10.09.2021.
3. As a result thereof I, as Competent Authority decided to impose upon you major/minor penalty including dismissal from service under the said Rules.
4. You are, therefore, require to Show Cause as to why the aforesaid penalty should not be imposed upon you.
5. If no reply to this notice is received within 7-days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.
6. You are at liberty to be heard in person, if so wished.


HAROON RASHID KHAN (T.S.T PSP)
Senior Superintendent of Police
(Operations) Peshawar



جناب عالی!

حوالہ شدہ نیشنل ٹیوکار نوٹس نہایت ادب
کیساتھ مریض خدمت پر ہے کہ من سائل قبل ازین دوران
انکو انٹری تفصیلاً بیان ہے جو کہ قابل ملاحظہ ہے۔ جس میں
سائل کوئی حریف نہیں کرتا چاہتا ہے۔

بحر حال یہ امر قابل ذکر ہے کہ خارج شدہ میں مندرجہ الزام
علاقہ نہیں اور میں گائڈنگ پر مبنی ہے۔ کیونکہ جو بھی الیکار

DSB میں ڈیوٹی پورا انجام دیتا ہے۔ اس کا ضرور حیران اور

علاقہ کے شہر سٹارڈو کسٹا کو کسی طرح شلی فونڈ

روابطہ ہوئے۔ کیونکہ اس کے بعد کو "Good work" نہیں

ہو سکتا۔ اور ان ہی روابط کی بنیاد پر من سائل نے متعدد

ڈاٹ ڈیٹ اور سرور ان کو گرفتار کیے ہیں۔ جنکی

بنیاد پر سائل کو افسران مالہ نے توصیفی اسناد اور نقد

انعامات دیتے ہیں۔ جو کہ لف ہذا ہیں۔

سائل نے بے داغ ملازمت انجام دی ہے۔ اور عزم کئے ڈیوٹی

انعام ندری اور جلوہ صفت کسٹا کو انجام دی ہے۔ سائل کا

ان حیران کسٹا کو سے روابط بھی اسکی ادب کری ہے۔ کیونکہ

کھر روابط کے علاوہ کوئی دوسرا ٹکوس ثبوت نہیں ہے۔ جو

کہ سائل کی زندگی یا مددگاری کی عکاسی کر سکے

اس لئے درخواست ہے کہ وہ بلا حقیقت کے

پیش نظر سائل کے خلاف ہر قسم انکو انٹری کو داخل دفتر نہ کرے۔

Handwritten signature