

1

**BEFORE THE KHYBER PAKHTUNKHWA**  
**SERVICES TRIBUNAL PESHAWAR.**

Service Appeal No. 1463/2023.

Title: "Mr. Asfandyar V/S IGP KP & Others"

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**DSP Legal CTD HQ**  
**PESHAWAR**

04-04-2024  
Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL**  
**PESHAWAR.**

Service Appeal No. 1463/2023.

Mr. Asfandyar, Ex Constable No. 629/FRP, KP, Peshawar.

..... (Appellant)

VERSUS

1. **Inspector General of Police KPK Peshawar.**
2. **The Commandant Frontier Reserve Police, KP, Peshawar.**
3. **Deputy Inspector General of Police, CTD, KP, Peshawar.**

..... (Respondents)

2

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL  
PESHAWAR.

Service Appeal No. 1463/2023.

COMMENTS BY RESPONDENTS (01 & 03).

Khyber Pakhtunkhwa  
Service Tribunal

Respectfully Sheweth

Diary No. 11987

The para-wise reply of the respondents is as under.

Dated 28-03-2024

Preliminary Objections:-

- a) The appellant has no cause of action or locus standi to file the appeal.
- b) The appeal is not maintainable in the present form.
- c) The appeal is bad for mis-joinder and non-joinder of necessary parties.
- d) The appellant is estopped to file the appeal by his own conduct.
- e) The appeal is barred by law and limitation.
- f) The appellant has not come to the Honorable Tribunal with clean hands.

FACTS:-

1. Pertains to record, hence needs no comments.
2. Pertains to record, hence needs no comments.
3. Incorrect, the appellant was enlisted/appointed in Frontier Reserve Police (FRP), KP, as constable vide Order Book (OB) No. 1350 dated 15.10.2009 & transferred from FRP, KP to CTD KP, vide order No. 24363-66/E-II, dated 30.09.2013 but he did not make his arrival report since 2013 to till date. Moreover, he is not on strength of CTD KP (enlistment order & transfer order No. 24363-66/E-II, dated 30.09.2013 are annexed as annexure "A & B").
4. Incorrect and denied, actually the appellant was transferred to CTD KP vide order No. 24363-66/E-II, dated 30.09.2013. Accordingly, he made his departure report from FRP KP, but he did not make his arrival report in CTD KP. Moreover, after lapse of almost 8 years, he preferred an appeal/application before the W/IGP KP, Peshawar, to adjust him in CTD KP and assign him duty. In this connection office of the W/IGP KP, Peshawar, has issued letter No.s S/2016/21, dated 21.05.2021 & S/2795/21, dated 25.06.2021, for provision of service record in respect of the appellant, in response this Unit had preferred letter No. 10800/EC/CTD, dated 27.08.2021, wherein it is intimated that "it is submitted that as per checking of this office record, Ex-FC Asfandyar No. 628 did not submit his arrival report in this Unit till date". Later on, the office of the W/IGP KP, Peshawar, had preferred a letter No. 3613/Registrar CPO, dated 09.09.2021, for provision of service record. In response, this Unit had sent letter No. 12100/SRC/CTD, dated 24.09.2021, along with Service Roll

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(containing 15 pages <sup>only</sup> as CTD KP, had received only the Service Roll, while nothing else). After these communications, there is no further communication took place till date and no comments ever called from CTD Unit in this regard till date. The allegations made by the appellant are totally baseless and fabricated. Moreover, letter No. S/449/21, dated 04.02.2021 & reminder-I NO. S/1467/21, dated 06.04.2021 were issued from the office of the W/IGP KP, Peshawar, for provision of a copy of the appellant's punishment order and appeal rejection order, in response this Unit had preferred a letter No. 5714/EC/CTD, dated 06.05.2021. wherein, this Unit had intimated that **"Ex-FC Asfandyar No. 628 is not on the strength of this Unit, Please"** (letter No.s S/2016/21, dated 21.05.2021, S/2795/21, dated 25.06.2021, 10800/EC/CTD, dated 27.08.2021, 3613/Registrar CPO, dated 09.09.2021, 12100/SRC/CTD, dated 24.09.2021, No. S/449/21, dated 04.02.2021, reminder-I NO. S/1467/21, dated 06.04.2021 & 5714/EC/CTD, dated 06.05.2021 are annexed as annexure "C" respectively).

5. Incorrect, the appellant had filed appeal before the W/IGP KP, Peshawar, for assurance/making of his arrival into CTD KP. But, it is worth to mention here that, appeal may lay only in case of an awarded punishment, if any, while on the other hand, the appellant has not awarded any punishment, however, he did not make his arrival at CTD since 2013 to till date. Moreover, an appeal may be filed within stipulated time period i.e. 30 days after communication of any punishment order. while on the other hand, there is no punishment awarded to the appellant. Moreover, apparently the appellant remained a ghost official as he neither been struck of nor shown at the strength of any Unit or Establishment which clearly manifest malafide, serious misconduct and negligence on the part of appellant as well as other dealing hands. In order to dig out the real facts and fix responsibility, an enquiry under the domain of DIG/IAB has been initiated in the instant case and the final outcome of which shall be communicated to the Hon'ble Tribunal during the course of arguments (copy of appeal is annexed as annexure "D").
6. This Service Appeal being devoid of merits with no legal footings needs to be dismissed on the following grounds.

## GROUND

- A. Incorrect, an appeal may lay only in case of an awarded punishment, if any, while on the other hand, the appellant has not awarded any punishment, however, he did not make his arrival report to this Unit since 2013 to till date. Moreover, an appeal may be filed within stipulated time period i.e. 30 days after communication of any punishment order, while on the other hand, there is no punishment awarded to the appellant. He willfully not submitted his arrival in CTD KP till date which is sufficient proof that he was not

5


welling/interested in Police Job. His appeal is badly time bared at this stage.

- B. Incorrect and denied as explained in detail in preceding paras, as no discrimination and unlawful act has been done to him by the respondents. Hence, no violation of Constitution of Pakistan 1973, has been done.
- C. Incorrect and denied, as above.
- D. Incorrect, there is no any impugned order but only his transfer/posting order No. 24363-66/E-II, dated 30.09.2013 through which he had transferred to CTD KP, from FRP KP, while, he did not make his arrival report still in CTD KP, since from 2013 to till date. Thus, this appeal is not maintainable in the eyes of law, because there is no any adverse order or punishment order available on record against the appellant.
- E. Incorrect. the appellant had transferred vide order No. 24363-66/E-II, dated 30.09.2013 from FRP KP, to CTD KP, but he never made his arrival at CTD KP, since 2013 to till date. Hence, the appellant is not on strength of CTD KP. Almost, after lapse of 10 years the appellant has no right to knock the door of justice as he willingly failed to obey the lawful orders regarding his transfer from FRP KP, to CTD KP. He also partially accepted this fact in his Service Appeal at Para 3 of facts.
- F. Incorrect. that for initiation of disciplinary/departmental proceedings, he shall prior make his arrival report in CTD KP, but he did not make his arrival since long 2013 to till date (almost 10 years have lapsed). This Unit can't initiate disciplinary action as he is not on strength of this Unit.
- G. Incorrect. as explained in above Para.
- H. Incorrect, the fundamental rights of the appellant have not been infringed by the respondents.
- I. Incorrect and totally baseless, if the appellant is claiming for salaries and showing his entitlement as an employee, he shall prior make his arrival and after arrival he will be dealt departmentally in accordance with the prevailing law/rules for his long absence (not making arrival in CTD KP, since 2013 till date).
- J. Incorrect, the respondents have not taken any action against the appellant till date because he is not on strength of CTD KP, as he did not make his arrival since 2013 to till date viz 2023.
- K. The facts mentioned above may please be considered sufficient grounds for the dismissal of instant appeal, however, respondents may please be allowed to raise additional grounds at the time of arguments.

Prayer:

In view of the above facts and grounds, it is humbly prayed that the instant appeal is devoid of facts and merits, may kindly be dismissed with costs.

Deputy Inspector General of Police,  
CTD, Khyber Pakhtunkhwa,  
Peshiwar  
Respondent No. 03 - 03  
(Imran Shahid) <sup>PSP</sup>  
Incumbent

  
DIG/Legal, CPO  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Respondent No. 01  
(DR. MUHAMMAD AKHTAR ABBAS) <sup>PSP</sup>  
Incumbent

7

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA.**

**Service Appeal No. 1463/2023.**

Mr. Asfandyar, Ex Constable No. 629/FRP, KP, Peshawar.

..... (Appellant)

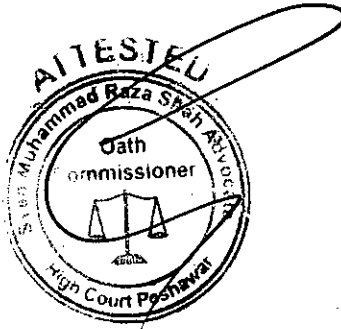
VERSUS

IGP KP & Others..... (Respondents)

**AFFIDAVIT**

I, the below mentioned respondent, do here by solemnly affirm and declare on oath that the contents of reply submitted are correct and true to the best of our knowledge and belief and that nothing has been concealed from this Honorable Court.

Deputy Inspector General of Police,  
CTD, Khyber Pakhtunkhwa,  
Peshawar  
Respondent No. 02 03  
(Imran Shahid) <sup>PSP</sup>  
Incumbent





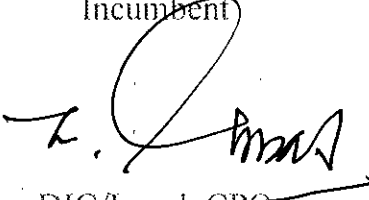
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OFFICE OF THE  
INSPECTOR GENERAL OF POLICE,  
KHYBER PAKHTUNKHWA,  
PESHAWAR.

AUTHORITY LETTER

We, the undersigned, do hereby authorize **DSP Syed Aamir Abbas** having CNIC No. **17301-8836248-7**, and **ASI Wajid Khan** having CNIC No. **17301-1515976-9**; both of CTD Peshawar to submit reply in Service Appeal No. 1463/2023 Titled "Mr. Asfandyar VS IGP & Others" and to pursue the matter on behalf of all the undersigned.

9 - - -  
Deputy Inspector General of Police,  
CTD, Khyber Pakhtunkhwa,  
Peshawar

Respondent No. 02 03  
(Imran Shahid) PSP  
Incumbent

  
DIG/Legal, CPO

For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Respondent No. 01

9  
(DR. MUHAMMAD AKHTAR ABBAS) PSP  
Incumbent



2244  
30-7-13ORDER

The following lower subordinates of FRP Khyber Pakhtunkhwa are hereby transferred and posted to DCT/Special Branch Khyber Pakhtunkhwa with immediate effect.

1.	Constable Numan Khan No. 377	
2.	Constable Maqsood Ali No. 379	
3.	Constable Samiullah No. 883	
4.	Constable Zohrab Khan No. 385	
5.	Constable Shameen Shah No. 400	
6.	Constable Hidayatullah No. 415	
7.	Constable Rizwanullah No. 416	
8.	Constable Shanjee Afsar No. 427	
9.	Constable Tanvir Shah No. 430	
10.	Constable Jehangir Khan No. 435	
11.	Constable Nisar Khan No. 444	
12.	Constable Muhammad No. 448	
13.	Constable Muhammad Shah No. 448	
14.	Constable Inayatullah Rehman No. 448	
15.	Constable Azab Ahmad No. 486	
16.	Constable Hamid Ali No. 489	
17.	Constable Khan Zeb No. 462	
18.	Constable Muhammad Iqbal No. 489	
19.	Constable Muhammad Bilal No. 493	
20.	Constable Musawer No. 583	
21.	Constable Saadat Ali Shah No. 595	
22.	Constable Sartaj No. 596	
23.	Constable Pariz Ahmad No. 621	
24.	Constable Masood Jan No. 622	
25.	Constable Misbahullah No. 626	
26.	Constable Asfandyar No. 628	
27.	Constable Aftab Ali No. 631	
28.	Constable Rah Dil No. 635	
29.	Constable Ihsanullah No. 643	
30.	Constable Asghar Khan No. 1616	
31.	Constable Imran Khattak No. 1620	
32.	Constable Fayaz Ahmad No. 1623	
33.	Constable Muzam Shah No. 1626	
34.	Constable Asim Khan No. 1658	
35.	Constable Asim Ali No. 1677	
36.	Constable Raza Muhammad No. 1711	
37.	Constable Naseem Khan No. 1722	
38.	Constable Nabirullah No. 1724	
39.	Constable Liaqat Ali No. 81	
40.	Constable Sherzad No. 1914	
41.	Constable Naeem ud Din No. 1958	
42.	Constable Mudassar Khan No. 1927	
43.	Constable Sher Wali Khan No. 1938	
44.	Constable Suleman No. 1948	
45.	Constable Farooq Ahmad No. 1954	
46.	Constable Naseeb No. 1955	
47.	Constable Gulab Gul No. 1957	

Attested

DSP LEGAL  
CTD HQ PESHAWAR

10

48	Constable Shehzad Alt No. 1999	
49		7
50	Constable Ghazim No. 2136	

(SOHAIL KHALID)  
AIG/Establishment  
For Provincial Police Officer,  
Khyber Pakhtunkhwa  
Peshawar.

No. 24363-66/E-II, dated Peshawar the 20/19 /2013.

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

1. Addl: IGP/HQs Khyber Pakhtunkhwa, Peshawar.
2. Addl: IGP/Commandant FRP Khyber Pakhtunkhwa.
3. Addl: IGP/Special Branch Khyber Pakhtunkhwa
4. Deputy Inspector General of Police, DCT/SB Khyber Pakhtunkhwa

Attested

DSP LEGAL  
CTD HQ PESHAWAR

11  
ENLISTMENT ORDER

Mr. Asfandyar S/o Arab Gul  
No. Najeem Koonra  
PS Mamrai Dist: Charsadda  
is hereby Enlisted as Constable in BPS (5) with effect from \_\_\_\_\_  
and allotted Constabulary No. 974.

Height 5'-8" Chest 33" x 34 1/2"

Education : 10th D/O 19.01.1982.

Age on enrolment 27 Years 08 Months 23 Days.

His service is purely on temporary basis and liable for termination at any time without any notice.

*Amal Khan*

DY: COMMANDANT,  
Frontier Reserve Police,  
N.W.F.P. Peshawar.

OB No. 1350

Date. 15/10/2009

Attested

BASIC PAY SCALES 2008  
OFFICE OF THE ACCOUNTS GENERAL  
PESHAWAR

56607

Joint Officer  
Registration Party  
Peshawar

*Amal*  
DSP LEGAL  
CTD HQ PESHAWAR

Amex

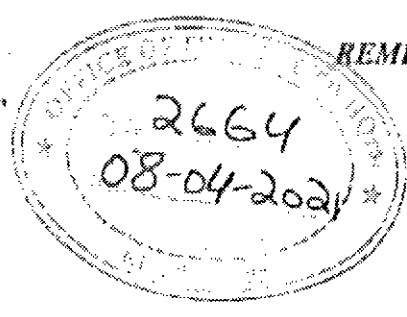
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OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar.

No. S/ 1467 /21, dated Peshawar the 06/04/2021.

To: The Deputy Inspector General of Police,  
Counter Terrorism Department,  
Khyber Pakhtunkhwa, Peshawar.



REMINDER-1

Subject: APPEAL

Memo:

Please refer to this office Memo: No. S/449/21, dated 04.02.2021.

The requisite copy of punishment order and appeal rejection order in r/o Ex-FC  
Asfandayar No. 628 is still awaited which may please be sent to this office to process his appeal.

SP HOS  
GC

(SYED ANIS-UL-HASSAN)  
Registrar,  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

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Mati

DIG/CTD  
For 08/04/2021

Attested  
DSP LEGAL  
CTD HQ PESHAWAR

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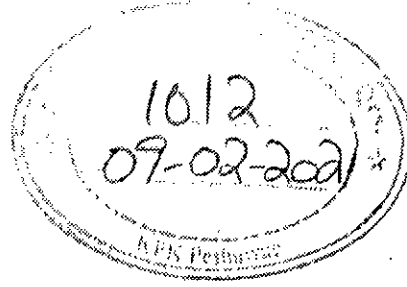
OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar.

No. W 449 /21, dated Peshawar the 02/02/2021.

To: The Deputy Inspector General of Police,  
Counter Terrorism Department,  
Khyber Pakhtunkhwa, Peshawar.

Subject: APPEAL

Memorandum



Ex-Constable Asfandiyar No. 628 of CTD has preferred application to the Worthy  
IG/Khyber Pakhtunkhwa for reinstatement in service.

In order to proceed further in the matter, a copy of his punishment order and appeal  
objection order may be sent to this office, please.

*[Handwritten signature]*

SP. HO:  
EC

*[Handwritten signature]*

DIG/CTD  
09/02/2021

*[Handwritten signature]*  
(SYED ANIS-UL-HASSAN)  
Registrar,

For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

*[Handwritten signature]*  
2/2

Attested *[Signature]*  
DSP LEGAL  
CTD HQ PESHAWAR

Attested by DSP Legal, CTD HQ, Peshawar

14

B

412

OFFICE OF THE,  
DEPUTY INSPECTOR GENERAL OF POLICE,  
CTD, KHYBER PAKHTUNKHWA,  
PESHAWAR.

No. 5714 /RO/CTD

Dated Peshawar the

06 /05/2021

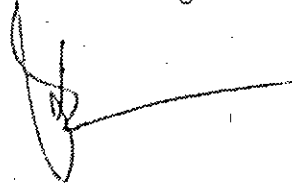
To:- The Inspector General of Police  
Khyber Pakhtunkhwa  
Peshawar.

SUBJECT: APPEAL

MEMO:


Kindly refer to your office Memo: No>S/449/21 dated 04-02-2021 and followed by  
reminder No. S/1467/21 dated 06-04-2021 on the subject cited above.

It is submitted that Ex-FC Asfandyar No. 628 is not in the strength of this Unit, Please.



SP/HQrs:

For Deputy Inspector General of Police,  
CTD, Khyber Pakhtunkhwa,  
Peshawar. *o ll*

Attested   
DSP LEGAL  
CTD HQ PESHAWAR

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*T. Sivas*

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OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
Central Police Office, Peshawar.

No. SI 2116 /21, dated Peshawar the 21/05/2021

To: The Deputy Inspector General of Police,  
Counter Terrorism Department,  
Khyber Pakhtunkhwa, Peshawar.

Subject: APPEAL.

Memo:

Please refer to your office Memo: No. 5714/EC/CTD, dated 06.05.2021.

In this regard it is communicated that Commandant, FRP, Khyber Pakhtun Peshawar vide his office Memo: No. 970/SI Legal, dated 28.01.2021 intimated that 1 Asfandayar No. 628 was transferred to CTD unit and his service record was sent to CTD vide No. 7301/SRC, dated 11.10.2013 (Copy of Memo: No. 970/SI Legal, dated 28.01.2021 is encl:

*(Signature)*  
(NOOR KHAFGHAN)  
Registrar,

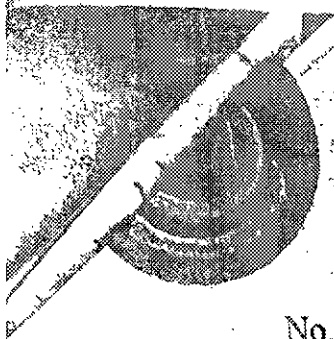
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

*(Signature)*  
19/5

Attested *(Signature)*  
DSP LEGAL  
CTD HQ PESHAWAR

16

B



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

No. S/ 2795 /21, dated Peshawar the 25/06 /2021

To,

Deputy Inspector General of Police,  
Counter Terrorism Department,  
Khyber Pakhtunkhwa, Peshawar

Subject: - APPEAL

Memo:

Kindly refer to this office letter No. S/2016/21, dated 21.05.2021 (copy enclosed) on the subject cited above.

The requisite reply is still awaited from your good office, which may please be send to this office at the earliest to proceed further in the matter.

*(Signature)*  
**(NOOR AFGHAN)**  
Registrar  
For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

*(Signature)*  
SP/HQ:  
EC  
*(Signature)*  
D/G/CTD  
28-6-21

Attested *(Signature)*  
DSP LEGAL  
CTD HQ PESHAWAR



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OFFICE OF THE,  
DEPUTY INSPECTOR GENERAL OF POLICE,  
CTD, KHYBER PAKHTUNKHWA,  
PESHAWAR.

No. 10800 /EC/CTD Dated 27 /08/2021

To: - The Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

SUBJECT: APPEAL

MEMO:

Kindly refer to your office Memo: No. S/2016/21 dated 21-05-2021 followed by reminder No. S/2795/21 dated 25-06-2021 on the subject cited above.

It is submitted that as per checking of this office record, Ex-FC Asfandyar No. 628 did not submitted his arrival report in this Unit till date.

SP/HQrs:

For Deputy Inspector General of Police,  
CTD, Khyber Pakhtunkhwa,

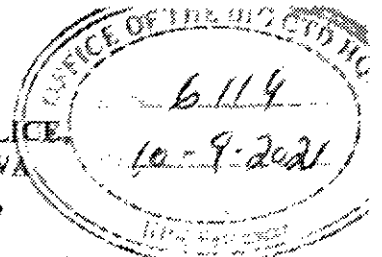
Peshawar. o/c

Attested

DSP LEGAL,  
CTD HQ PESHAWAR

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



Phone No. 971-9217843  
Registrar.cpo@gmail.com

No. 3613 /Registrar CPO, dated 09/09/2021

To The Deputy Inspector General of Police,  
CTD, Khyber Pakhtunkhwa, Peshawar.

Subject: APPEAL- SERVICE RECORD

Memo:


Please refer to your office memo: No. 10800/EC/CTD, dated 27.08.2021 on the subject cited above.

As intimated by Commandant, FRP, Khyber Pakhtunkhwa, Peshawar the Service Record of Ex-Constable Asfandiyar No. 628 was sent to DIG/CTD, Khyber Pakhtunkhwa vide No. 7301/SRC, dated 11.10.2013.

In order to proceed further in the matter the Service Record of Ex-Constable Asfandiyar No. 628 may please be sent to CPO as early as possible please.

  
(NOOR AFGHAN)  
Registrar

For Inspector General of Police,  
Khyber Pakhtunkhwa Peshawar

  
SP/IGP  
EC/SRC



  
DIG/CTD  
10-09-21

Attested



DSP LEGAL  
CTD HQ PESHAWAR



19  
B 790  
OFFICE OF THE,  
DEPUTY INSPECTOR GENERAL OF POLICE,  
CTD, KHYBER PAKHTUNKHWA,  
PESHAWAR.

No. 12100 /SRC/CTD Dated Peshawar the 24/09/2021

To: - The Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

SUBJECT: APPEAL SERVICE RECORD

MEMO:

Please refer to your office Letter No. 3613/Registrar dated 09-09-2021 on the subject cited above.

The service record of Ex-Constable Asfandiyar No. 628 is submitted herewith for the subject purpose which may please be returned when no longer required.

(Encl)

Service Roll - 01 (containing 15 pages)

SP/HQrs:

For Deputy Inspector General of Police  
CTD, Khyber Pakhtunkhwa  
Peshawar

Attested

DSP LEGAL  
CTD, HQ PESHAWAR

Annexure - 2

11/03/2014

بخدمت جناب محرز اسے آئی جی، پشاور سٹیٹ پبلک پروفیٹوریٹ

جناب عالی!

گزارش ہے کہ مسائل نہایت فریب زد ہے۔ سال 2009 کو ٹیکس پالیسی میں بطور کاٹ بھریا گیا تھا جس کے تحت 2014 کے سال اپنے فریکٹس نہایت خوش اسلوبی سے سرانجام دیے۔ سال 2014 کو FRP پورے سے DCT پورے سے دقت مسائل کو چند نہایت ہی عیب و گھریلو مسائل و تنازعات درپیش تھے۔ جسکی نام پر مسائل فریب زد ہے۔ DCT میں اپنی حاضری کے تحت وہاں پر متعلقہ کام نے کہا کہ یہاں پر آپکا کوئی ریکارڈ نہیں ہے۔ چند سالوں میں وہاں پر مسائل دیکھے گئے۔ DCT پورے سے مسائل کی گئی مسائل دو بارہ FRP آکر متعلقہ اہلکاران سے منت سہجت کی لیکن کوئی تنواری نہیں کی جاسکے بعد مسائل نے مسائل میں رول ڈوڑا کیے ٹیکس سے بچنے کے لیے کیے درخواست بھیجی جس پر کسی پونٹ کے کارروائی نہیں کی۔ اس کے بعد مسائل نے اپنی درخواستیں FRP اور DCT پونٹ میں جمع کی لیکن اس پر بھی کوئی کارروائی نہ ہوئی۔ جبکہ مسائل کی اب تک کسی پونٹ FRP اور DCT کا ٹریڈ ہوئی اور نہ ہی مسائل کو ٹیکس کے طرف سے کوئی اطلاع وغیرہ دیا گیا ہے۔ تاکہ وہ اپنی حاضری یا غیر حاضری پورے سے مسائل کے پونٹ کے طرف سے عزت کی گئی۔ تاہم فرانسفر کے بعد مسائل کی چند باغیچا DCT میں کالی گئی ہیں (Pay Slip) اور درخواستیں جن کے بعد مسائل کے خلاف اب تک کسی قسم کی تھکانہ کارروائی بھی نہیں کی گئی ہے۔

اس سلسلے میں سال نے اپنی حاضری باہت کی طرف سے اپنی درخواست جناب ISP صاحب کی خدمت میں ارسال کی ہے۔ دو دنوں پونٹ FRP اور DCT سے گیس منگوائے گئے جو کہ سابقہ ایس کی ڈانس میں موجود ہیں چونکہ مسائل نہایت فریب زد ہے اس لیے کہتے ہیں۔ والد بھی فوت ہوا ہے مسائل کا کوئی دوسرا ذریعہ معاش بھی نہیں ہے اور خاندان کا واحد ذریعہ ہی نہایت ہی محدود ہے اور ان کے مسائل کی ایک اور درخواستیں پشاور پولیس میں حاضری کرنے کے احکامات بنا کر فرمائیں جاوے۔ مسائل تاحیات ڈیمانڈ ہوگی۔

العارض

آپکا تابع فرمان اسفندیار خان بلٹ نمبر 628 FRP پشاور  
 سکے گاؤں غزنی سرکی میرہ پشاور ضلع چارسدہ  
 موبائل نمبر: 9950470/0301-8950370

Attested  
 DSP LEGAL  
 CTD HQ PESHAWAR  
 21/03/2014  
 JE-IV  
 20/03/2014



Signature and date: 20/03/2014

خدمت جناب معزز انسپکٹر جنرل آف پولیس خیبر پختونخوا

Better 13

رحم درخواست

جناب عالی!

گزارش ہے کہ سائل نہایت غریب بندہ ہے۔ سائل سال 2009ء کو محکمہ پولیس میں بطور کانسٹیبل بھرتی ہوا۔ سائل نے 2014ء تک پانچ سال اپنے فرائض نہایت خوش اسلوبی سے سرانجام دیئے۔ سائل کا تبادلہ 2014ء کو FRP ہیڈ کوارٹر سے DCT پشاور میں ہوا۔ میں اسی وقت سائل کو چند نہایت پیچیدہ گریڈ مسائل و تنازعات درپیش تھے۔ جسکی بناء پر سائل ڈیڑھ ماہ بعد جب DCT میں اپنی حاضری کے لیے گیا تو وہاں پر متعلقہ حکام نے کہا کہ یہاں پر آپکا کوئی ریکارڈ نہیں ہے۔ چند ماہ سائل در بدر کی ٹھوکریں کھاتا رہا لیکن DCT کی طرف سے انکی حاضری نہیں کی گئی سائل دوبارہ FRP آکر متعلقہ اہلکاران سے منت سماجت کی لیکن کوئی شنوائی نہیں ملی۔ اسکے بعد سائل نے مسائل و تنازعات کے حل میں بھاگ دوڑ کیلئے محکمہ سے چھٹی لینے کیلئے درخواست بھیجی جس پر کسی یونٹ نے کارروائی نہیں کی۔ اسکے بعد سائل نے اپنی حاضری کیلئے بھی درخواستیں FRP اور DCT یونٹ میں جمع کی لیکن اس پر بھی کوئی کارروائی نہ ہو سکی۔ جبکہ سائل کی اب تک کسی یونٹ FRP اور DCT میں حاضری ہو سکی اور نہ ہی سائل کو محکمہ کی طرف سے کوئی اطلاع وغیرہ موصول ہوئی۔ تاکہ وہ اپنی حاضری یا غیر حاضری بابت اپنی صفائی پیش کر سکے حالانکہ سائل عرصہ دراز سے کوشش میں ہے کہ محکمہ پولیس کے متعلقہ افسران کے سامنے پیش ہو کر اپنی معروضات سامنے رکھ سکے لیکن سائل کو ہر یونٹ کی طرف سے معذرت کی گئی۔ تاہم ٹرانسفر کے بعد سائل کی چند ماہ تنخواہیں DCT میں نکالی گئی ہیں (Pay Slip) لف درخواست ہذا ہے۔ جبکہ سائل کے خلاف اب تک کسی قسم کی محکمہ کارروائی بھی نہیں کی گئی ہے۔

اس سلسلے میں سائل نے اپنی حاضری بابت کچھ عرصہ قبل اپنی درخواست جناب IGP صاحب کی خدمت میں ارسال کی ہے۔ جس پر دونوں یونٹ FRP اور DCT سے کمشنر منگوائے گئے جو کہ سابقہ اپیل کی فائل میں موجود ہیں چونکہ سائل نہایت غریب گھرانے سے تعلق رکھتا ہے۔ والد بھی فوت ہوا ہے سائل کا کوئی دوسرا ذریعہ معاش بھی نہیں ہے اور خاندان کا واحد کفیل ہے نہایت ہی موذبانہ اور عاجزانہ التجاء ہے کہ سائل کی رحم درخواست منظور فرما کر پر محکمہ پولیس میں حاضری کرنے کے احکامات صادر فرمائی جاوے۔ سائل تاحیات دعا گو رہیگا۔

العارض

آپکا تابع فرمان اسفندیار خان بلٹ نمبر 28 FRP ہیڈ کوارٹر

سکنہ گاؤں غزگی سرکی میرہ ترنگزی ضلع چارسدہ

موبائل نمبر۔ 0316-8950470/0301-8950370

Attested  
DSP LEGAL  
CTD HOTEL HAWAR