


FORM OF ORDER SHEET

Court of _____

Appeal No. 599/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/04/2024	<p>The appeal of Mr. Muhammad Yaseen presented today by Mr. Muhammad Hamza Chamkani Advocate, It is fixed for preliminary hearing before Single Bench at Peshawar on 30.04.2024. Parcha Peshi given to the counsel for the appellant .</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

SERVICE APPEAL NO: 599 OF 2024

MUHAMMAD YASEEN

VERSUS

**INSPECTOR GENERAL (AIG) OF PRISONS, KHYBER PAKHTUNKHWA,
PESHAWAR AND OTHERS**

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Date: 26-02-2024

APPELLANT

THROUGH,



MUHAMMAD HAMZA CHAMKANI

ADVOCATE HIGH COURT PESHAWAR

MOBILE NUMBER: 0344-0953328

OFFICE NO. 1 & 2, 2ND FLOOR YOUSUF RIYAZ

KHALIL ADVOCATE BLOCK,

NEW JUDICIAL COMPLEX, PESHAWAR.

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

SERVICE APPEAL NUMBERED 599 OF 2024

MUHAMMAD YASEEN, HEAD WARDER, CENTRAL PRISON, MARDAN.

APPELLANT

VERSUS

1. ~~DEPARTMENT~~ INSPECTOR GENERAL (AIG) OF PRISONS, KHYBER PAKHTUNKHWA,
PESHAWAR.

2. SUPERINTENDENT CIRCLE HEADQUARTERS PRISON, MARDAN.

RESPONDENTS

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 26-03-2024 OF RESPONDENT NO 1 WHEREBY THE DEPARTMENTAL APPEAL WAS PARTIALLY ACCEPTED AND MAJOR PENALTY OF REMOVAL FROM SERVICE AWARDED BY RESPONDENT NO 2 HAS BEEN CONVERTED INTO MINOR PENALTY I.E " WITHHOLDING OF INCREMENTS FOR THREE YEARS AND THE INTERVENING PERIOD OF THE APPELLANT FROM THE DATE OF REMOVAL FROM SERVICE TO THE DATE OF RE-INSTATEMENT IN SERVICE WAS CONSIDER AS LEAVE WITHOUT PAY".

PRAYER :

On acceptance of this instant appeal the partial impugned order of respondent numbered 1 dated 26-03-2024 to the extent of " Withholding of increments for three years and the intervening period of the appellant from the date of removal from service to the date of re-instatement in service was consider as leave without pay" may kindly be set aside and the salary of the intervening period i.e from the date of removal from service to the date of re-instatement in service may kindly be order to paid to the appellant.

RESPECTFULLY SUBMITTED:

1. That the appellant was enlisted as Wardar in Central Prisons , KPK on 19-04-2006 and was promoted as Head Wardar in 2022 and since enlistment, the appellant performed his duties with honesty and full devotion and to the entire satisfaction of his high ups.
2. That the appellant while posted as Head Wardar in Central Prison, Mardan was issued Charge Sheet with Statement of allegations on 28-11-2023 on the allegations mentioned therein which was replied in detail refuting the allegations.

COPY OF CHARGE SHEET IS ANNEX "A"

3. That thereafter an illegal inquiry was conducted wherein the appellant was subjected to cross examination in violation of law and rules and then a Show Cause Notice was issued to the appellant which was replied in detail by the appellant refuting the allegations.

COPY OF INQUIRY REPORT IS ANNEX "A"

COPY OF SHOW CAUSE NOTICE IS ANNEX "B"

COPY OF REPLY OF APPELLANT IS ANNEX "D"

4. That strangely the appellant was awarded the major penalty of "Removal from Service" by respondent No 2 vide Order dated 01-02-2024.

COPY OF ORDER DATED 01-02-2024 IS ANNEX "E"

5. That the appellant preferred departmental appeal before respondent No 1 on 22-02-2024, which was accepted partially & where upon major penalty of "Removal from Service" was converted into minor penalty of "Withholding of increments for three years and the intervening period of the appellant from the date of removal from service to the date of re-instatement in service was consider as leave without pay", are in violation of law and rules.

COPY OF DEPARTMENTAL APPEAL DATED 22-02-2024 IS ANNEX "F"

COPY OF IMPUGNED ORDER OF RESPONDENT 2 DATED 26-03-2024 IS ANNEX

"G"

6.. That being aggrieved from the partial impugned order of respondent numbered 1 dated 26-03-2024 the appellant approaches this honorable tribunal on the following grounds inter-alias as follows :

GRUNDS :-

- i. That the impugned Order are illegal, unlawful, without lawful authority and void ab-initio.
- ii. That mandatory provisions of law and rules have been badly violated by the respondents and the appellant has not been treated according to law and rules in violation of Article 4 and 25 of the Constitution.
- iii. That the impugned orders are in total disregard of the law & is against the facts and circumstances of the case as such void ab-initio.
- iv. That no evidence of any sort with respect to the allegation has been brought on record to support the allegation.
- v. That the allegations levelled against the appellant are vague, false as no eye witness came forward to which could prove the allegation alleged by the concern authorities against the appellant.
- vi. That the mobile phone was not recovered from the appellant inside the jail premises, however the same were handed over at Talashi Gate by the appellant in the presence of Akama Ullah (Head warder) & Rustam Shah (Chief) but the inquiry officer refuse to record their statement regarding the false implication of appellant.

- vii. That no proper inquiry was conducted in the matter nor the appellant was provided proper opportunity of defense, even the statement of the officials was not recorded who were present on the duty at that time.

- viii. That the malafide is proved from the fact that the inquiry has been conducted by the inquiry officer appointed by the Respondent Numbered 2, and the appellant was awarded harsh major penalty despite the fact that the inquiry officer recommended minor penalty.

- ix. That the appellant was not afforded opportunity of proper hearing and to produce documentary evidence in his support.

- x. That the appellant has about 18 years of service with unblemished service record, even the inquiry officer in his inquiry checked the previous record of appellant, wherein it was found that the appellant was never involved in any illegal act/misconduct i.e smuggling of mobile or any other contrabands inside the jail, during his 18 years of service.

- xi. That any other ground may be raised by the appellant, with prior permission of this Honorable Tribunal.

PRAYERS:

It is therefore most humbly prayed that On acceptance of this appeal the impugned Order dated 26-03-2024 , to the extent of "Withholding of increments for three years and the intervening period of the appellant from the date of removal from service to the date of re-instatement in service was consider as leave without pay" may kindly be set aside and the salary of the intervening period i.e from the date of removal from service to the date of re-instatement in service may kindly be order to paid to the appellant.

5

Any other relief deemed appropriate and not specifically asked for, may also be granted in favor of the appellant.

Dated: 25-04-2024

M. Ais
Appellant

Through

[Signature]
MUHAMMAD HAMZACHAMKANI

&
IBAD KHALIL

[Signature]
COUNSEL HIGH COURT(S)

LIST OF BOOKS:

- Constitution 1973.
- Other Books as per need

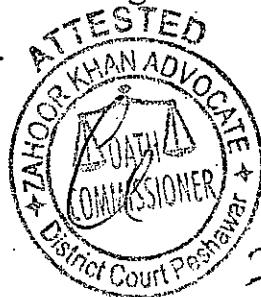
CERTIFICATE:

Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.

[Signature]
ADVOCATE

AFFIDAVIT

I, Muhammad Yaseen , Head Warder, Central Prison, Mardan , do hereby solemnly affirm and declare on oath that the contents of this Service Appeal, are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.



M. Ais
DEPONENT

25/04/24

CHARGE SHEET

6 A

I, Superintendent Circle Headquarter Prison Mardan, as competent authority, hereby charge you Head Warder (Under Suspension) Muhammad Yaseen S/O Muhammad Mursaleen (BPS-09) attached to Central Prison Mardan as under.

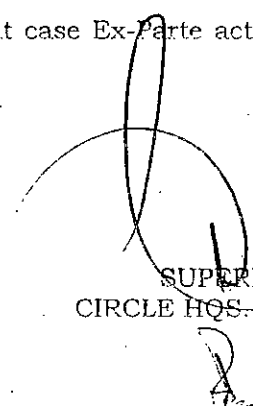
As per report of Superintendent Central Prison Mardan:-

"You were allotted duty at Sector No. 05 as sector relief from unlocking to 08:30 AM. During body search in Dewri you handed over one Android mobile phone voluntarily to Warder Usman (Talashi Gate). Another Android mobile/cell phone without sim card was recovered from your possession concealed by you in your front pocket by Warder Usman (Talashi Gate) at about 06:31 AM on 28.11.2023 during body search. The recovery was made in the presence of Warder Shahid Masih (Talashi Shah) and Warder Saleem (Key Mate) at Dewri of the jail."

By reasons of the above, you appeared to be guilty of misconduct under rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) Rules 2011 and have rendered yourself liable to all or any of the penalties specified in rule 4 of the rules ibid.

Therefore you are required to submit your written defense if any within ten (10) days of the receipt of this Charge Sheet to the inquiry officer.

- 1- Your written defense, if any, should reach to the inquiry officer within the specified period, failing which shall be presumed that you have nothing in your defense and in that case Ex-Parte action shall be taken against you.
- 2- Intimate whether you desire to be heard in person.
- 3- A Statement of allegations is enclosed.


SUPERINTENDENT
CIRCLE HQS-PRISON MARDAN



(7)

B



OFFICE OF THE
COMMANDANT
PRISONS STAFF TRAINING ACADEMY
(PSTA) HARIPUR
Phone & Fax: 0995-920067
pstaharipur@gmail.com

No. 194/ ^{JUL} Dated 17/1/2024

To,

The Superintendent Jail,
Circle Headquarter Prisons, Mardan.

Subject: - INQUIRY REPORT

Memo:

Reference to your Office letter No. 3372-76 dated: 28-11-2023.

After having been appointed as an Inquiry Officer vide letter under reference, the undersigned adopted proper procedure as per rules mentioned in the Khyber Pakhtunkhwa Government Servants Efficiency & Discipline Rules 2011 (amended in 2021) for initiating Inquiry against accused Head Warder Muhammad Yaseen S/O Muhammad Mursaleen attached to Central Prison Mardan for recovery of Android Mobile/ Cell Phone concealed in his front pocket during body search at Main Dewry as specified in the Statement of Allegations.

PROCEDURE.

In order to find the factual position of the case, the undersigned fixed a date for inquiry proceeding and summoned the accused to appear for inquiry Proceedings proceeded on the date fixed. In this respect the undersigned proceeded to Central Prison Mardan and a thorough inquiry was conducted in to the matter. The accused official attended the Inquiry proceedings and submitted his written statement which is self-explanatory and attached as Annexure- A. An opportunity of hearing was given to him and he was cross examined. Similarly, other relevant staff were also interrogated and recorded their statements which are enclosed as Annexure-B1, B2, B3... In the light of written statement of the accused and other staff, following facts and findings were discovered: -

FACTS & FINDINGS.

As per statement of allegations "during body search in Dewry, the accused handed over one Android Mobile voluntarily to Warder Usman (Talashi Gate) while another Android Mobile Phone was recovered from his possession" In this respect the accused Head Warder admitted that he handed over one mobile phone voluntarily to Talashi Gate

while the 2nd Mobile Phone was recovered from his possession which he purchased in Peshawar for his wife and forgot in his pocket.

During cross examination, he did not provide receipt/any documentary evidence of the Mobile Phone which he purchased, thus the burden of proof lied on him to defend himself.

During Course of inquiry proceedings and verbal discussion, the undersigned felt that his statement is not based facts as such if he purchased the Mobile Phone then he was required to: -

1. Keep the phone in his Home at Peshawar and hand over the Mobile Phone to his wife.
2. Hand over the Mobile Phone to his colleagues/roommates till his duties timing.
3. Hand over the Mobile Phone to Talashi Gate like he handed over the other one.

Therefore, statements/defense reply of the accused Head Warder is not satisfactory and seems nothing instead plethora of verbose.

Likewise, from the perusal of statements of other staff members i.e. Talashi Gate, Line Muharrar, Line Officer, it is also evident that Mobile Phone without SIM was recovered from his possession. As per statement of Line Muharrar, neither was he granted any leave nor rest/Bachat on the same day then how can it possible that he purchased the mobile in Peshawar, which also generate question mark on his statements. Hence charge proved against him.

Anyhow, the Mobile Phone was recovered from his front pocket of his shirt which create a little bit doubt.

Moreover, previous service record of the accused Head Warder was also checked wherein it was observed that he was never involved in smuggling of Mobile Phone or other contrabands to inside the Jail during his service.

CONCLUSION:

In view of the above narrated facts and findings, the undersigned concluded that the accused Head Warder did not submit any documentary proof in his defense to justify his innocence. Therefore, the undersigned recommended minor penalty of *Stoppage of Three Annual Increments for the period of Three Years* or any other punishment as the competent authority deemed appropriate, please.

(AMIN SHUAIB)
COMMANDANT
PRISONS STAFF TRAINING ACADEMY
HARIPUR

9 C

NO: _____

SHOW CAUSE NOTICE

I, Muhammad Arif Khan (BPS-18), Superintendent Headquarter Prison Mardan, as competent authority, under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, do hereby serve you, Head Warder (Under Suspension) Muhammad Yaseen S/O Muhammad Mursaleen (BPS-09) attached to Central Prison Mardan as follows:-

1- (i) That consequent upon the completion of inquiry conducted against you by the Inquiry Officer for which you were given opportunity of hearing vide this office communication No. 3372-76 dated: 28.11.2023.

(ii) On going through the findings and recommendations and other connected papers including your defence before the said Inquiry Officer, I am satisfied that you have committed the following act/ omission specified in section 3 of the said rules:-

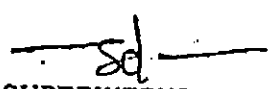
"You were allotted duty at Sector No. 05 as sector relief from unlocking to 08:30 AM During body search in Dewri you handed over one Android mobile phone voluntarily to Warder Usman (Talashi Gate). Another Android mobile/cell phone without sim card was recovered from you possession concealed by you in your front pocket by Warder Usman (Talashi Gate) at about 06:31 AM on 28.11.2023 during body search. The recovery was made in the presence of Warder Shahid Masil (Talashi Shab) and Warder Saleem (Key Mate) at Dewri of the Jail."

2- Thereof, I, as competent Authority have tentatively decided to impose upon you the Major Penalty of "Removal from Service" under section 4 of the said rules.

3 You are therefore required to show cause as to why the aforesaid penalty should not be imposed upon you, also intimate whether you desire to be heard in person.

If no reply to this notice is received within seven days or not more than fifteen days of its delivery shall be presumed that you have no defence to put in and in that case an ex-parte action shall be taken against you.

A copy of the findings of the inquiry officer is enclosed.

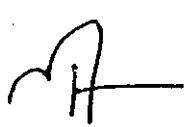

SUPERINTENDENT
CIRCLE HQS PRISON MARDAN


Sl No. 199-94-WF. Dated. 26/01/2024.

Copy of the above is forwarded to:-

- 1. The Worthy Inspector General of Prisons Khyber Pakhtunkhwa Peshawar for information please.
- 2. The Superintendent Central Prison Mardan for information and with the request that one copy of the Show Cause Notice duly signed and dated by the accused official as a token of its receipt to be returned to this office for record, please.

The above named (Under Suspension) Head Warder C/O Superintendent Central Prison Mardan




SUPERINTENDENT
CIRCLE HQS PRISON MARDAN

To,

The Inquiry Officer Amin Shoaib

In reference to the inquiry 3367-70 dated 28.11.2023 I was issued shows cause notice in this context I would humbly explain that at in relevant day I was in possessions of two Android Cell Phone which I handed over to warder namely Usman at the Talashi Gate. The Android Cell Phone was available in my front Pocket which I voluntarily hand over to the Warden. It is incorrect that the same was canceled and record during search.

I did not try to enter the Cell Phone in the prohibit area of the Jail I have not committed any illegal or unlawful act nor I violated the rules of the Jail.

At the relevant night Javed Subedar exchange some harsh words with me hence he lodged the instant complaint against me.

The mobile which I handed over at the Talashi Gate are my personal Mobile Phones which I have purchase at the day for before for family use.

That the said mobile phones have been handed over in the presence of Akama Ullah and Rustam Shah who were present at the Talashi Gat. That after the counting of prisoner Javed Subidar made the said allegations against me.

That Akam Ullah and Rustam Shah are the witnesses of the occurrence and they are also ready to narrate the real story before the authority concerned.

It is therefore most humbly requested that on acceptance of instant reply.

Your's obedient
Akama Ullah head warden
1-1 Brown incident

To,

(12)

"F"

The I.G Prison, Head Office KPK Peshawar.

APPEAL AGAINST THE IMPUGNED ORDER VIDE DATED 01.02.2024 PASSED BY THE SUPERINTENDENT HEAD QUARTER PRISON MARDAN AND ORDER VIDE DATED 28.11.2023 PASSED BY THE INQUIRY OFFICERS WHEREIN THE APPELLANT WAS FIRSTLY AWARDED MINOR PENALTY AND LATER ON MAJOR PENALTY WAS INFLECTED AND DISMISSED THE APPELLANT FROM SERVICE.

Prayer:- ON ACCEPTANCE OF THE INSTANT DEPARTMENTAL APPEAL THE IMPUGNED ORDER MAY PLEASE BE SET ASIDE AND REINSTATE THE APPELLANT WITH ALL CONSEQUENTIAL BACK BENEFITS.

Respected Sir,

Appellant submits as under:-

1. That the appellant was charge sheet on dated 28.11.2023 and the concerned authority suspended the appellant and a show cause notice was issued.
2. That an inquiry was conducted and the inquiry officer awarded minor penalty of stoppage of three Annual increments for a period of three years. (Copy of order is attached).
3. That the appellant was later on dismissed by the authority concerned (Copy of order is attached).
4. That the appellant feeling aggrieved from the impugned orders approaches to this Hon'ble office on the following grounds inter alia:-

GROUNDS:

- A. That the orders of the impugned office and superintendent HQs Prison Mardan is against the law facts and circumstances of the case hence not maintainable in the eye of law.
- B. That the orders of both officers are based on malafide. Hence liable to be set aside.
- C. That the penalty awarded which leads to the dismissal is harsh one.
- D. That the appellant was not properly heard.
- E. That the appellant was not previously charged for the same act or omission.

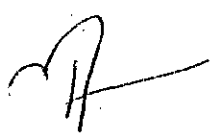
- F. That no eye witness came forward which could prove the allegation alleged by the authority concerned.
- G. That the appellant did not transported the mobile phone beyond the prohibited area and in this regard no evidence is available that the mobile phone was recovered in the prohibited area.
- H. That double jeoperdi is prohibited in the constitution of Islamic of Pakistan 1973.

It is therefore most humbly prayed that on acceptance of the instant departmental appeal the impugned order may please be set aside and reinstate the appellant with all consequential back benefits.

Dated: 22.02.2024

Appellant

Muhammad Yaseen *M.Y.*
S/o Muhammad Mursaleen
Khyber Pakhtunkhwa
Prison Police Deptt:
CNIC: 17301-6539541-5





(14) G

**OFFICE OF THE
INSPECTOR GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

☎ 091-9210334, 9210406 📠 091-9213445

No. Estb/Ward/Orders/ 1-1-1102024-1

Dated: 1-02-2024

ORDER:

WHEREAS, Ex-Head Warder Muhammad Yascen S/o Muhammad Mursaleen, while attached to Central Prison Mardan was awarded the major penalty of "Removal From Service" by Superintendent HQs Prison Mardan vide order No. 381-86 dated 01-02-2024 due to his misconduct / recovery of mobile phone inside the Jail's main gate.

AND WHEREAS, the said Ex-Head Warder preferred his departmental appeal for setting aside the penalty awarded to him and also requested for reinstatement.

AND WHEREAS, he was afforded an opportunity of personal hearing on 14-03-2024. His appeal was examined in light of the available record of the case and it was observed that keeping in view the nature of case, the inquiry officer recommended the minor penalty of withholding of three increments, but the competent authority awarded him the major penalty without recording any cogent reason. During the course of hearing, the appellant produced the cash memo of mobile phone as a proof which showed that the appellant had purchased the mobile phone for himself which recovered from him. Moreover, the cash memo and the recovered mobile has similar IMEI Number which endorsed plea of the appellant. Going through his 18 years service history, it was found that his service record is reasonably clean. Hence, plea of the appellant is partially justified and the penalty is found too harsh.

NOW THEREFORE, having considered the charges, evidences/facts on record as well as the provision of rules in vogue and in exercise of powers conferred under Rule-17 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 read with Rule-05 of Khyber Pakhtunkhwa Service Appeal Rules 1986, appeal of the appellant is hereby partially accepted and his major penalty of "Removal from Service" is hereby converted into minor penalty "Withholding of Increments for three years". The intervening period i.e. from the date of removal from service" to the date of re-instatement in service is hereby treated as leave without pay.

**ADDL. INSPECTOR GENERAL OF PRISONS,
KHYBER PAKHTUNKHWA, PESHAWAR**

ENDST: NO. 15073-36-1

Copy of the above is forwarded to the:

1. Superintendent, Headquarters Prison Mardan for information and w/r to his letter No. 624/WE/PB dated 28-02-2023.
2. Superintendent Central Prison Mardan for information and necessary action. He is directed to inform the appellant accordingly and to make necessary entry in his Service Book under proper attestation.
3. The appellant concerned C/o Superintendent Central Prison Mardan for information.
4. PS to I.O, Prisons Khyber Pakhtunkhwa Peshawar.

**DEPUTY DIRECTOR
INSPECTORATE GENERAL OF PRISONS
KHYBER PAKHTUNKHWA PESHAWAR**

بعدالت

حکمہ رجسٹریشن و اسٹریٹس ڈیولپمنٹ

2ء منجانب
 16/11/2024ء بمقام

موزعہ
 مقدمہ
 دعوی
 جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
 آن مقام سے اور کیلئے عجم حمزہ چیمکنی ایڈووکیٹ جنرل
 مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا ایبیل کی برآمدگی
 اور منسوخی نیز دائر کرنے ایبیل نگرانی و نظرتانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت
 مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے
 تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے
 اور اس کا ساختہ پرداختہ منظور قبول ہوگا و دران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے
 سبب سے وہ ہوگا کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں
 گے کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

الرقوم 25 ماہ 06 2024

العبد گواہ العبد

کے لئے منظور ہے

مقام

Handwritten signature