

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

**Appeal.No. 1092/2024.**

Fayaz Muhammad Ex-Assistant, O/O Deputy Commissioner Peshawar .....(Appellant)

VERSUS

1. The Commissioner, Peshawar Division, Peshawar.
2. The Deputy Commissioner, Peshawar.

.....(Respondents)

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

Appeal.No. 1092/2024.

Fayaz Muhammad Ex-Assistant, O/O Deputy Commissioner Peshawar .....(Appellant)

VERSUS

1. The Commissioner, Peshawar Division, Peshawar.
2. The Deputy Commissioner, Peshawar.

.....(Respondents)

**PARAWISE COMMENTS ON BEHALF OF RESPONDENT No.1&2**

Respectfully Sheweth,

Khyber Pakhtunkhwa  
Service Tribunal

Dhary No. 16477

Dated 09-10-24

**Preliminary Objections.**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant is estopped by his own conduct to file the appeal.
3. That the appellant has not come to the Court with clean hand.
4. That the appeal is not maintainable in its present form.

**OBJECTION ON FACTS.**


1. Correct to the extent that the appellant was working as Assistant (BPS-16) in this office, however his performance is a matter of record.
2. Transfer/Posting is a routine matter ordered for running official business smoothly.
3. Correct to the extent that the appellant was serving at the Office of Assistant Commissioner Mattani, when complaints were received against him and therefore he was closed to the main office and deputed with Addl. Assistant Commissioner (HQ) Peshawar, but he did not obey the orders. After explanation was called, the appellant submitted his reply and arrival report. But he did not attend the office and continue to serve at Assistant Commissioner Mattani office, despite the directions/orders of the competent authority i.e. Deputy Commissioner Peshawar (Respondent No.2). The appellant is well aware of the fact that the appointing authority i.e. Deputy Commissioner Peshawar (Respondent No.2) is the superior/competent authority and his orders are final, but the appellant ignored the order of the competent authority and continue to serve with Assistant Commissioner Mattani who is a sub-ordinate officer and thus showed glaring misconduct and dis-obedience. Certainly his performance with Assistant Commissioner Mattani must have malafide intention as he had no obligation to obey the orders of a sub-ordinate officer after issuance of the orders of the competent authority (Respondent No.2). This conduct on the part of the appellant was not becoming a Govt. Servant and pre-judicial to good order of service discipline and comes under misconduct as per Rule-2(l) of Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules 2011.
4. Incorrect. The appellant submitted his reply to Show Cause Notice which had no footings and he continued to argue that he was obeying orders of Assistant Commissioner Mattani thereby accepting his glaring dis-obedience.
5. Incorrect. The case of the appellant was delayed due to severe engagements in official routine business such as Eid-ul-Fitr arrangements, Ramazan/Eid Package, Polio Eradication Campaign etc. as well as newly established regime started working rigorously and thus the case could not be processed in a timely manner.

6. Correct to the extent that in emergency and due to shortage of staff, he was assigned only one day duty for just checking the proceedings at the Joint Check Post at Islamabad-Motorway Toll Plaza and no major responsibility was given to him.
7. The order was righteously issued as per Law and all the grounds raised by appellant are incorrect and attempt to hide his fault. Details objections on the ground are below.


#### OBJECTION ON THE GROUNDS

- A. Incorrect. All the legal procedures were followed as prescribed in the Khyber Pakhtunkhwa Govt. Servant (Efficiency & Discipline) Rules 2011 as accepted by the appellant himself in the above paras.
- B. Incorrect. The appellant was closed from AC Mattani on the direction of competent authority (Respondent No.2) who was the superior authority and appellant was bound to accept his orders. Appellant's utter disregard/disobedience to the lawful authority shows his malafide intention due to which he was proceeded subsequently as per law prescribed under Khyber Pakhtunkhwa Govt. Servant (Efficiency & Disciplinary) Rules 2011. After suspension and even stoppage of his pay, the appellant insisted, by his own will, to perform duty with AC Mattani which reflects his attitude towards the orders of the competent authority. In an another Inquiry, no record of challan for the year 2023-24 in the Assistant Commissioner Mattani office.
- C. Incorrect. The appellant was given full opportunity, heard personally and after considering all the information and facts available and fulfilling the requirements under the law the Inquiry officer submitted his inquiry report (copy of the Inquiry report attached as Annex-A).
- D. Incorrect. Appellant was proceeded as per law and his behaviour/attitude towards orders of the competent authority reflects his malafide intention and ulterior motives.
- E. No comments.

It is, therefore, very humbly prayed that the instant appeal of the appellant may graciously be dismissed with cost.

  
Deputy Commissioner  
Peshawar  
(Respondent No.2)

رافیس مسعود

  
Commissioner  
Peshawar Division Peshawar  
(Respondent No.1)

رافیس مسعود  
Deputy Commissioner  
Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.****Appeal.No. 1092/2024.**

Fayaz Muhammad Ex-Assistant, O/O Deputy Commissioner Peshawar .....(Appellant)

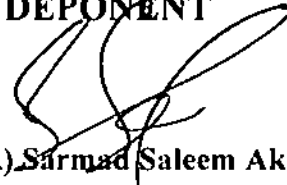
VERSUS

1. The Commissioner, Peshawar Division, Peshawar.
2. The Deputy Commissioner, Peshawar.

.....(Respondents)

**AFFIDAVIT**

I, Capt.(R) Sarmad Saleem Akram, Deputy Commissioner, Peshawar do hereby solemnly affirm and declare on oath that the contents of this reply are true and correct to the best of my knowledge and belief. Nothing has been concealed from this honourable Tribunal and neither answering respondent have been placed ex-parte nor their defence have been struck off/cost.

**DEPONENT**


(Capt.(R) Sarmad Saleem Akram)  
Deputy Commissioner  
Peshawar



7/10/24

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR.****Appeal.No. 1092/2024.**

Fayaz Muhammad Ex-Assistant, O/O Deputy Commissioner Peshawar .....(Appellant)

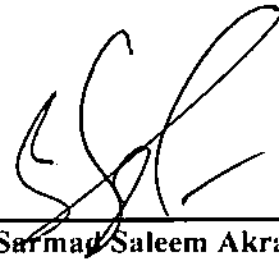
VERSUS

1. The Commissioner, Peshawar Division, Peshawar.
2. The Deputy Commissioner, Peshawar.

.....(Respondents)

**AUTHORITY LETTER**

I, Capt.(R) Sarmad Saleem Akram, Deputy Commissioner Peshawar do hereby authorize Mr. Qaiser Khan, Superintendent of Deputy Commissioner Office, Peshawar for submission of joint parawise comments before the Honourable Khyber Pakhtunkhwa Services Tribunal Peshawar and to peruse the case on each subsequent hearing fixed in the case till finalization of the case, hence, an authority letter issued in favour of above named officer.



(Capt.(R) Sarmad Saleem Akram)  
Deputy Commissioner  
Peshawar



5

THE ASSISTANT COMMISSIONER, HASSAN KHEL  
PESHAWAR

Tel: 091-9211899, Fax: 091-9212303 DCPeshawar

No: 748 /AC(HK)/Fayaz Muhammad (Assistant)/179

Dated Pesh the: 24<sup>th</sup> Sep-2023

To,

The Deputy Commissioner,  
Peshawar.

Subject: INQUIRY REPORT:

Respected Sir:

Reference office order No.0226/DC(P)/EA, dated.26-07-2023, regarding suspension of Fayaz Muhammad (Assistant, Under-suspension) on charge of disobedience and habitually absenting himself from duty. The undersigned was appointed as Inquiry Officer to probe into the matter and submit fact finding inquiry report.

Background:

Mr. Fayaz Muhammad (Assistant, Under-suspension) was posted as Reader to Assistant Commissioner, Mattani Peshawar. He was transferred to the office of Additional Assistant Commissioner, Shah Alam, vide office order No.0178/ADC(P), dated. 13-06-2023 and Mr. Asad Ullah (Junior Clerk), was transferred to Assistant Commissioner Mattani's Office. However, Fayaz Muhammad (Assistant), was retained in the office of Assistant Commissioner, Mattani, Peshawar, vide Additional Deputy Commissioner (G), Peshawar, office order, No.7547-53/DC(P)/EA, dated.16-06-2023. Mr. Asad Ullah (Junior Clerk) was transferred from Assistant Commissioner Mattani Office to Establishment Section of DC Office, Peshawar, vide order No. 0193/DC(P)/EA, Dated. 23-06-2023.

On 06<sup>th</sup> July, 2023, vide office order No. 2624/DC(P)/EA, Fayaz Muhammad, was closed to the office of Addl: Assistant Commissioner (HQ), Peshawar.

The Additional Assistant Commissioner (HQ), Peshawar, vide No. 0209/DC(P)/EA, dated. 12-07-2023, issued explanation to Fayaz Muhammad (Assistant) for non submission of arrival report in pursuance to office order No. 2624/DC(P)/EA, dated. 06-07-2023. The official concerned submitted his arrival report on 13-07-2023 (F.N) to worthy Deputy Commissioner, Peshawar, duly endorsed by Addl; Assistant Commissioner (HQ), Peshawar, dated. 13-07-2023.

He also submitted his departure report to the Assistant Commissioner Mattani, Peshawar, on 13-07-2023 (F.N). The Assistant Commissioner, (Mattani) Peshawar, on the face of departure report, directed the official concerned namely Fayaz Muhammad, "Do not relinquish the charge before the arrival of another reader, as it would affect the court cases and revenue matter as well, therefore, on the arrival of new reader from DC Office, you may relinquish the charge, as this office does not have the Reader and Computer Operator as well".

Mr. Fayaz Muhammad, Assistant, was placed under suspension vide office order No. 0226/DC(P)/EA, dated. 26-07-2023, for disobedience of the office order of Competent Authority and his continuous absence from the section, where he was supposed to perform duty as per direction of competent authority.

Proceedings:

The office order was received on 26-07-2023.

In pursuance of Rule-12(a) of Khyber Pakhtunkhwa, Govt; Servant (Efficiency & Discipline) Rules-2011, summon was issued to Fayaz Muhammad (Assistant Under suspension), on 26-07-2023, vide office No. 885-88/AC(HK)/179, to appear before the undersigned. The official attended this office. He requested another date for submission of his written statement. The Official attended this office again on 31-07-2023 and submitted his written statement, as well as, reply to the questionnaire conveyed to him on 31-07-2023.

The complainant namely Feroz Khan C/O Rosh Tikka Restaurant (RTR), at Ring Road, Peshawar, as mentioned in order, issued vide No.0226/DC(P)/EA, dated.26-07-2023, was summoned for personnel hearing and submission of written statement. He submitted his written on 31-07-2023.



6

**THE ASSISTANT COMMISSIONER, HASSAN KHEL  
PESHAWAR**

Tel: 091-9211899, Fax: 091-9212303 DCPeshawar

**Statement of Fayaz Muhammad (Assistant):**

Fayaz Muhammad (Assistant, under suspension), submitted in his written statement that on 06-07-2023, I, was transferred from Assistant Commissioner Mattani Office, to Deputy Commissioner Office, Peshawar. However, I, was unaware, nor officially informed. He further stated that he has submitted arrival report and reply to the explanation issued from office of Addl; Assistant Commissioner (HQ), Peshawar.

He also stated that on the same day, he submitted relinquish / departure report to Assistant Commissioner, Mattani, Peshawar. Wherein, Assistant Commissioner, Mattani, Peshawar, directed through her note on departure report, not to relinquish charge.

He further explained in his written statement that he is unaware of the public complaints and the same have not been provided to him.

In a questionnaire provided to him, he has replied that arrival report to the Litigation Branch has been submitted and attached.

**Statement of Feroz Khan:**

On 31-07-2023, Feroz Khan attended inquiry proceedings and submitted his written statement. He submitted in his written statement that he had verbally complained due to some misunderstanding, which is clear now. He further submitted that he has no complaint against Fayaz Muhammad.

**Findings:**

Discreet and secret inquiry was also made from officers / officials of District Administration Peshawar. Available record was thoroughly perused.


During inquiry, no sufficient material found against Fayaz Khan (Assistant, under suspension), regarding extorting of illegal money from public. Verbal complaint made by Feroz Khan has also been withdrawn by him in his written statement.

Perusal of the record reveals that Fayaz Muhammad (Assistant Under, suspension), did not obey the office order No. 2624/DC(P)/EA, dated.06-07-2023, of the competent Authority i.e Deputy Commissioner, Peshawar. He submitted only his arrival report on 13-07-2023, after, he was issued explanation, on 12-07-2023. His plea, which he submitted in his written statement, that Assistant Commissioner Mattani has directed him, not to relinquish charge, is legally not justified for the reason that the Competent Authority in such a matter and for the post of Assistant (BPS-16), is the Deputy Commissioner. The official concerned, after submitting his arrival on 12-07-2023, was supposed and bound to perform duty, as per directions of the Deputy Commissioner, Peshawar, which, he has failed to comply in the instant case.

During the discrete and secret inquiry, it was found that official concerned namely Fayaz Muhammad is still performing his duties in the office of Assistant Commissioner Mattani, Peshawar, even after, his suspension issued vide order No.0226/DC(P)/EA, dated.26-07-2023. This conduct on part of Govt; servant is un-becoming and pre-judicial to good order or service discipline. It leads to misconduct as per Rule -2(I) of Khyber Pakhtunkhwa, Govt; Servants (Efficiency & Discipline) Rules-2011.

Fact finding report is submitted for further proceedings / action as per law, please.

Attested 

  
ASSISTANT COMMISSIONER,  
HASSAN KHEL, PESHAWAR  
04/9/23



**THE DEPUTY COMMISSIONER, PESHAWAR**

Tel: 091-9212301-02, Fax: 091-9212303, DCPeshawar

No. 0226 DC(P)/EA

Dated: 26-July-2023

**ORDER:**

WHEREAS, Mr. Fayaz Muhammad Assistant, working with AC Mattani as Reader, was closed to the office of Addl. Assistant Commissioner (HQ) on public complaints vide order No.2624/DC(P)/EA dated 06-07-2023, but he did not obey the order.

AND WHEREAS, explanation was called from him vide letter No.0209/DC(P)/EA dated 12-07-2023, upon which he submitted his reply alongwith arrival report on 13-07-2023. The official was directed to ensure his attendance in the litigation section by Addl. Assistant Commissioner (HQ) Peshawar till further orders. The official did not obey the orders and continued his absence. Mr. Feroz Khan as well as general public complained that the accused official is still working in the previous office and extorting money illegally from the public.

NOW THEREFORE, keeping in view behaviour of the accused official, Mr. Fayaz Muhammad Assistant is hereby placed under suspension with immediate effect and Assistant Commissioner Hassan Khel is hereby appointed as enquiry officer to probe into the matter and submit his fact finding enquiry within a week's time positively.

SD/-  
DEPUTY COMMISSIONER  
PESHAWAR

**Endst: No. and Date Even:**

- (i) Addl. Deputy Commissioner (G), Peshawar.
- (ii) Assistant Commissioner Hassan Khel, Peshawar/enquiry officer for necessary action.
- (iii) Accounts Officer of DC office with the direction to stop the salary of the above noted official till finalization of the enquiry.
- (iv) PS to Deputy Commissioner, Peshawar.
- (v) Mr. Fayaz Muhammad, Assistant (under suspension) with the direction to report to AAC (HQ) office and appear before the enquiry officer as and when direction.

Addl. Assistant Commissioner (HQ)  
Peshawar

Steno  
Prepare case file,  
Summon the official.

26/7/2023



(8)



**THE DEPUTY COMMISSIONER, PESHAWAR**

Tel: 091-9212301-02, Fax: 091-9212303, DCPeshawar

No. 0178/ADC(P)/

Dated: /3-06-2023

**ORDER:**

The posting/transfer of the following staff is hereby ordered with immediate effect in the best public interest.

S.No.	Name	From	To
1.	Mr. Inayat Khan, Comp. Operator	ADC (R&HR)	AAC City
2.	Mr. Umar Farooq, Comp. Operator	Waiting for posting	AAC Town
3.	Syed Amin Shah J/Clerk	AC Saddar	AAC (Gen)
4.	Mr. Khalid Khan, S/Clerk	AAC Shah Alam	AC Saddar
5.	Mr. Fayaz Muhammad Assistant	AC Mattani	AAC Shah Alam
6.	Mr. Muhammad Saad J/Clerk	AAC Town	AC Shah Alam
7.	Mr. Asadullah, J/Clerk	AAC PDA	AC Mattani
8.	Mr. Noman Khan J/Clerk	AC Shah Alam	AAC PDA
9.	Syed Sardar Ali Shah J/Clerk	Tehsildar City	Tehsildar Saddar
10.	Mr. Iftikhar Ahmad Assistant	Tehsildar Saddar	Tehsildar City
11.	Mr. Daniyal Mushtaq Reader	NT Tahkal	Tehsildar Shah Alam
12.	Mr. Muhammad Masood Assistant	Tehsildar Shah Alam	NT Tahkal
13.	Mr. Muhammad Masood J/Clerk	NT Mathra	Tehsildar Mattani
14.	Mr. Asif Khan J/Clerk	Tehsildar Mattani	NT Mathra
15.	Mr. Muhammad Irfan, J/Clerk	Diary/Dispatch Section	AAC Town
16.	Mr. Muhammad Zubair, J/Clerk	Muhafiz Khana (old)	With additional duty at DK section
17.	Mr. Muhammad Saeed J/Clerk	DK Section	Diary/Dispatch Section
18.	Mr. Misbahullah J/Clerk	Diary/Dispatch Section	AC Hassan Khel
19.	Mr. Muhammad Saeed, S/Clerk	DC office	AAC Hassan Khel
20.	Mr. Shah Hussain, N/Qasid	Reception	Tehsildar Shah Alam

(9)

21.	Mr. Arshad Khan, N/Qasid	Tehsildar Shah Alam	NT Tahkal
22.	Mr. Qaiser Khan, J/Clerk	NT Dilzak	AD (R&HR)
23.	Mr. Raees Khan, J/Clerk	Waiting for posting	NT Dilzak

-Sd/-  
DEPUTY COMMISSIONER  
PESHAWAR

Endst: No. and Date Even:

Copy forwarded to the:-


1. Assistant Commssioner concerned, Peshawar.
2. Addl. Assistant Commissioner Hassan Khel, Peshawar.
3. Addl. Assistant Commissioner City, Peshawar.
4. Addl. Assistant Commissioner concerned, Peshawar.
5. Tehsildars/Nalb Tehsildars concerned, Peshawar.
6. PS to Deputy Commissioner, Peshawar.
7. Officials concerned for strict compliance.

  
ADDITIONAL DEPUTY COMMISSIONER (G)  
PESHAWAR





**THE DEPUTY COMMISSIONER PESHAWAR**

Tel: 091-9212301-02, Fax: 091-9212303.  DCPeshawar

Dated the Pesh: 16<sup>th</sup> June, 2023

**OFFICE ORDER:**

No: 7547-53/DC(P)/EA. Mr. Fayaz Muhammad, Assistant, currently under transfer to Addl: Assistant Commissioner (Shah Alam) is hereby retained in the office of Assistant Commissioner-Mattani, Peshawar in best public interest and till further order.

--Sdx--

**DEPUTY COMMISSIONER**

**Endst. No. and Date Even:**

Copy forwarded for information to the:

- i. Addl: Deputy Commissioner (Gen/F&P/R&HR), Peshawar
- ii. All Assistant Commissioners, District Peshawar
- iii. All Addl: Assistant Commissioners, District Peshawar
- iv. All Tehsildars/Naib Tehsildars, District Peshawar
- v. Superintendent, o/o Deputy Commissioner, Peshawar
- vi. Officials concerned for strict compliance

  
ADDL: DEPUTY COMMISSIONER (GEN)

**KHYBER ROAD, GATE # 3, ATTACHED DEPARTMENT COMPLEX, PESHAWAR.**



THE DEPUTY COMMISSIONER, PESHAWAR

Tel: 091-9212301-02, Fax: 091-9212303, [7] DCPeshawar

No. 0193/DC(P)/EA

Dated: 23-06-2023

ORDER:

Mr. Asadullah Junior Clerk under transfer to AC Mattani office Peshawar is hereby transferred/posted in Establishment Section of this office with immediate effect in the larger public interest.

Sd/-  
DEPUTY COMMISSIONER  
PESHAWAR

Endst: No. and Date Even:

Copy forwarded to the:-

1. Addl. Deputy Commissioner (G), Peshawar.
2. Assistant Commissioner Mattani, Peshawar.
3. PS to Deputy Commissioner, Peshawar.
4. Official concerned for strict compliance.

  
Addl. Assistant Commissioner (HQ)  
Peshawar





**THE DEPUTY COMMISSIONER PESHAWAR**

Tel: 091-9212301-02, Fax: 091-9212303, DC Peshawar

Dated the Pesh: 06<sup>th</sup> July, 2023

**OFFICE ORDER:**

No: 2624/DC(P)/EA. Mr. Fayaz Muhammad, Assistant, posted as Reader to Assistant Commissioner-Mattani, Peshawar is hereby closed to office of Addl: Assistant Commissioner (HQ), Peshawar in best public interest and till further order.

--Sdx--

DEPUTY COMMISSIONER

**Endst. No. and Date Even:**


Copy forwarded for information to the:

- i. Addl: Deputy Commissioner (F&P/R&HR), Peshawar
- ii. All Assistant Commissioners, District Peshawar
- iii. All Addl: Assistant Commissioners, District Peshawar
- iv. All Tehsildars/Naib Tehsildars, District Peshawar
- v. Superintendent, o/o Deputy Commissioner, Peshawar
- vi. Officials concerned for strict compliance

  
ADDL: DEPUTY COMMISSIONER (GEN)



Issue Explained

 E.A -  
11-07-23

KHYBER ROAD, GATE # 3, ATTACHED DEPARTMENT COMPLEX, PESHAWAR.



**THE DEPUTY COMMISSIONER, PESHAWAR**

Tel: 091-9212301-02, Fax: 091-9212303, DC Peshawar

No. 0209 DC(P)/EA

Dated: 12-07-2023

To

Mr. Fayyaz Muhammad,  
Assistant.

Subject:

EXPLANATION

It has been noted that you have been closed to this office vide order No.2624/DC(P)/EA dated 06-07-2023 but you have not yet reported your arrival yet and found absent from duty without any intimation/approval of competency authority.

Your this behavior tantamount toward Indiscipline, misconduct and disobedience and make you liable to be proceeded under Khyber Pakhtunkhwa Govt. Servant. E&D Rules 2011.

You are therefore called upon to explain your position that why action should not be taken against you under E&D Rules 2011 for this delinquency. Your reply should reach this office by tomorrow before 12:00 PM positively failing to which disciplinary action will be initiated against you.

*[Handwritten Signature]*

Additional Assistant Commissioner (HQ)  
Peshawar

Endst: No. and Date Even:

Copy forwarded to the PS to Deputy Commissioner Peshawar.

*[Handwritten Signature]*

Additional Assistant Commissioner (HQ)  
Peshawar

*[Handwritten Signature]*

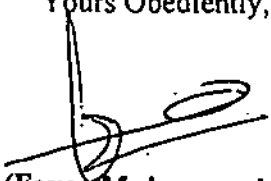
To  
The Deputy Commissioner.  
Peshawar.

Subject: ARRIVAL REPORT

Respected Sir,

In compliance to your kind office order No.2624/DC(P)/EA dated 06/07/2023, I, Fayaz Muhammad, Assistant submit my arrival report for duty today on 13/07/2023 (F.N.).


Yours Obediently,

  
(Fayaz Muhammad)  
Assistant (BPS-16)  
DC Office Peshawar

Dated: 13/07/2023

13/7/23

E.A


  
13-07-23



DEPARTURE REPORT

In compliance with letter No.2624/DC(P)/EA, dated 06.07.2023, I, Fayaz Muhammad, Assistant/Reader to AC Mattani, is hereby submit my departure report today, on 13.07.2023 (F/N).

Dated 13<sup>th</sup> July, 2023.

  
(Fayaz Muhammad);  
Assistant/Reader, AC Mattani.

Copy for information to the: -

1. Deputy Commissioner, Peshawar.
2. Assistant Commissioner Mattani.

Do not relinquish the charge before the arrival of another reader, as it would effect the court cases and revenue matter as well therefore on the arrival of the new reader from DC office, you may relinquish the charge. As the office does not have the reader and computer operator as well



M. Aminullah Shari  
13/7/23





THE ASSISTANT COMMISSIONER, HASSAN KHEL  
PESHAWAR

Tel: 091-9211899, Fax: 091-9212303, DC Peshawar

No: 506-89 AC(HK)/179

Dated Pesh the: 26 / July, 2023.

To,


Mr. Fayaz Muhammad (Assistant),  
Deputy Commissioner's Office,  
Peshawar.

Subject: NOTICE / SUMMON UNDER RULE-12(a) OF KHYBER PAKHTUNKHWA  
GOVERNMENT SERVANTS' EFFICIENCY & DISCIPLINE) RULES-2011:

MEMO:

Reference Office Order No. 0226/DC(P)/EA, dated. 26-07-2023, ordering your suspension and appointing the undersigned as Inquiry Officer to probe into the matter.

You are hereby directed to appear before the undersigned along with written statement on 27-07-2022 at 1000 Hrs, for further proceedings in inquiry.

  
26/7  
ASSISTANT COMMISSIONER,  
HASSAN KHEL, PESHAWAR.

Endst; No. & Date=Even:

Copy forwarded to: -

1. The Deputy Commissioner, Peshawar.
2. The Additional Deputy Commissioner (G), Peshawar.
3. The Additional Assistant Commissioner (HQ), Peshawar, w.r.t office order quoted above, with the request to provide the document pertains to inquiry.

  
26/7  
ASSISTANT COMMISSIONER,  
HASSAN KHEL, PESHAWAR.



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Handwritten signature or initials.

Handwritten text, possibly a date: 31/07/2023  
Handwritten signature.

Handwritten text, likely a letter or document, written in Urdu. The text is oriented vertically on the page.

سوال نامہ بابت انکوائری بر خلاف فیاض محمد (اسسٹنٹ) ڈپٹی کمشنر آفس پشاور

سوال نمبر ۱: آپ کب بھرتی ہوئے۔

جواب: مارچ ۱۹۹۵ء

سوال نمبر ۲: آپ کا تبادلہ بطور ریڈر کب ہوا ہے۔

جواب: ستمبر ۲۰۲۲ء

سوال نمبر ۳: دوران ملازمت آپ کتنی مرتبہ درخواست / معطل ہوئے۔

جواب: کبھی بھی نہیں

سوال نمبر ۴: آپ کا تبادلہ بحوالہ آفس آرڈر نمبر 2624/DC(P)/EA تاریخ 06-07-2023 اسسٹنٹ کمشنر متنی سے ایڈیشنل اسسٹنٹ کمشنر (بیڈ کوارٹر) کو ہوا۔ کیا آپ نے Arrival جمع کیا ہے۔ اگر جمع کیا ہے تو کاپی لف کریں۔

جواب: کارڈ لف کر کے

سوال نمبر ۵: آپ کو ایڈیشنل اسسٹنٹ کمشنر (بیڈ کوارٹر) نے حکم دیا تھا کہ آپ لیڈنگیشن برانچ میں حاضری یقینی بنائیے۔ کیا آپ نے Arrival جمع کیا ہے۔ اگر جمع کیا ہے تو کاپی لف کریں۔

جواب: کارڈ لف کر کے

سوال نمبر ۶: آپ پر یہ الزام لگایا گیا ہے کہ آپ کا تبادلہ اسسٹنٹ کمشنر متنی سے ایڈیشنل اسسٹنٹ کمشنر (بیڈ کوارٹر) کو ہوا۔ باوجود تبادلے آپ نے چارج نہیں چوڑی اور لوگوں سے پیسے غیر قانونی طور پر وصول کرتے ہیں۔ جو کہ فیروز نامی شخص نے محترمہ ایڈیشنل ڈپٹی کمشنر (جنرل) پشاور کے سامنے بیان کی ہے۔

جواب: تخصیص بیان لکھ کر

فیاض محمد

۲۹/۱۲/۲۳



THE ASSISTANT COMMISSIONER, HASSAN KHEL  
PESHAWAR

Tel: 091-9211899, Fax: 091-9212303, DC Peshawar

No: 591-94/AC(HK)/179

Dated Pesh the: 27 / July, 2023.

To,

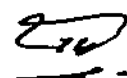
Mr. Feroz Khan,  
c/o Rosh Tikka Restaurant (R.T.R),  
Ring Road, Peshawar.

Subject: NOTICE / SUMMON UNDER RULE-12(a) OF KHYBER PAKHTUNKHWA  
GOVERNMENT SERVANTS' EFFICIENCY & DISCIPLINE) RULES-2011:

MEMO:

Reference Office Order No. 0226/DC(P)/EA, dated. 26-07-2023.

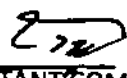
You are hereby directed to appear before the undersigned along with written statement on 31-07-2023 at 1000 Hrs, for further proceedings in inquiry.

  
27/7/2023  
ASSISTANT COMMISSIONER,  
HASSAN KHEL, PESHAWAR.

Endst; No. & Date=Even:

Copy forwarded to: -

1. The Deputy Commissioner, Peshawar.
2. The Additional Deputy Commissioner (G), Peshawar.
3. The Additional Assistant Commissioner (HQ), Peshawar, w.r.t office order quoted above, with the request to provide the document pertains to inquiry.

  
27/7/2023  
ASSISTANT COMMISSIONER,  
HASSAN KHEL, PESHAWAR.








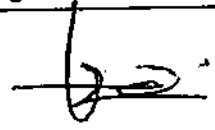
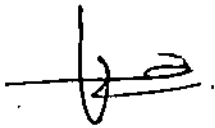


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**THE ASSISTANT COMMISSIONER, HASSAN KHEL  
PESHAWAR**

Tel: 091-9211899, Fax: 091-9212303  DCPeshawar

**ATTENDANCE SHEET**

**"INQUIRY PROCEEDINGS AGAINST OFFICIAL, FAYAZ MUHAMMAD (ASSISTANT)"**

S#	Name	Designation	Signature:	Contact #	Date
1.	Fayaz	Assistant		0334 3434077	27/7 2023
2.	"	"			7 31/2023
3.	"	"			8 1/2023
4.					
5.					
6.					
7.					
8.					
9.		Attested			
10.					
11.					
12.					