Form- A

FORM OF ORDER SHEET

Court of	
Case No	1243 / 2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge 3 The appeal of Mr. Najif Ali resubmitted today by Mr. Jehangir Khan Mohmnd Advocate. It is fixed for preliminary hearing before Single Bench Peshawar on Notices be issued to appellant and his counsel for		
1	2			
1-	23/08/2022			
		the date fixed.		
		By the order of Chairman		
		REGISTRAR		
·				

BEFORE KHYBER PKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR CHECK LIST

- Cas	e Title:vs	·	_
		Yes	No
S.#	Contents Tel 11 Monard Ad		
1.	This appeal has been presented by: Jehangin Whom Mohmon & All		
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2.	requisite documents?		
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6.	Whether affidavit is appended?		
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9.	subject, furnished?	<u> </u>	
10.	Whether annexures are legible?		
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13.	Whether copies of annexates are received to A.G/D.A.G? Whether copy of appeal is delivered to A.G/D.A.G?		
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22.	Whether index filed?		
23.	Whether index is correct?		
24.	Whether index is correct: Whether Security and Process Fee deposited? on Whether Security and Process Fee deposited? Tribunal Rules 1974	.	
	Whether Security and Process Fee deposited? on Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent		
25.	Rule 11, notice along with copy of appear		
	to respondents? on Whether copies of comments/reply/rejoinder submitted? on		
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	Whether copies of comments/reply/rejoinder provided to opposite		
27.	party? on	_	ifiled

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:	Jehangin Khan Mham	and Ad
400 2009	34	
Signature:		•
Dated:		

The appeal of Mr. Najaf Ali S/O Sharbat Ali, R/O Sarpakh P.O Sadda, District Kurram received today i.e. on 27.07.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1. Memorandum of the appeal is unsigned which may be signed by the appellant.
- 2. Checklist is not attached with the appeal.
- 3. Appeal has not been flagged/marked with annexure marks.
- 4. Annexures of the appeal may be attested.
- 5. Copies of page no. 09, 13, 15 and 17 attached with the appeal are illegible which may be replaced by legible/better one.
- 6. Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.
- 7. Every memorandum of appeal shall be presented in approved file covers.

No. **3302** /S.T,

Dt. 29/07/2022

REGISTRAR SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Jahingir Khan Mohmand Adv. Pesh.

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Complet

Advo:

23/8/2022

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SA No: 1243 /2022

Versus

I N DEX

S.No.	Description of documents.	Annex:	Pages.
1.	Memo of appeal.		15
2.	Affidavit.		6
3.	Addresses of the parties.		87
4.	Copy of proof.	A	8
5.	Last posting order before merger	В	9
6.	Copy of the notification	С	10
7.	Copy of the statement of allegations and that of the charge sheet	D/1-D/2	11-13
8.	Copy of written statement/ reply to allegations	E	13-15
9.	Copy of the compromise deed	F .	16
10.	Copies of the final show cause notice and reply	G-H	17-18
11.	Copy of the original impugned order	I	19
12.	Copy of the impugned appellate order	J	2023
13.	Power of attorney		24
14.	Wakalatnama.		

Appellant

Through

Jehangir Khan Mohmand Advocate High Court

<u>PESHAWAR</u>

27/7/22

	Between 1940 810
SA No: /2022	27/7/2
Najaf Ali´s/o Sharbat Ali	
R/o Sarpakh PO Sadda, Kurram DistrictAppellar	nt .
Versus	•
Khyber Pakhtunkhwa Police through,	
1) Inspector General of Police, KPK Peshawar.	
2) Regional Police Officer/ DIG Kohat Region, Kohat.	•
3) District Police Officer, Kurram District.	
4) Inquiry Officer/ SP Investigation KurramRespondents	

APPEAL U/S 4 OF THE KHYBER **PAKHTUNKHWA SERVICE** TRIBUNAL ACT, 1974.

Respectfully submitted;

- 1. That the petitioner being bonafide resident and fully qualified was duly appointed as Khasadar in Kurram Levy Force from his tribal appointment order dated 01/07/1984. (Copy of Proof is annexure A)
- 2. That petitioner thereafter fulfilled all the requisite formalities including medical/ character certification and surety bonds etc,

assumed the charge and started performing his duties with utmost zeal and to the entire satisfaction of his superiors and public as well and was lastly posted as Subedar in the year 2017 before the merger. (Last posting order before merger is annexure B)

- 3. That after the introduction of the 25th amendment to the constitution, the Khasadar Force was merged into the regular police service of the Khyber Pakhtunkhwa Police Service through provincial legislation.
- 4. That after the merger, the petitioner was awarded the rank of Sub Inspector in BPS-14 (and later on was given shoulder promotion as Deputy Superintendent of Police (DSP) as per the notification vide notification no. SO (Police)HD/ SMY 2019 Merged Area/403-13 dated 14.02.2020. (Copy of the notification is annexure 2)
- 5. That petitioner was lastly serving as acting DSP Upper Kurram when an unfortunate incident took place and the appellant was accused of using abusive language on mobile phone with a social media activist who used to post false and derogatory posts against the police department of Kurram District.
- 6. That the matter went viral in the local internet media and upon the application of the said social media activist, respondent no. 3 ordered an enquiry against the appellant by issuing a statement of allegations bearing no. 950/PA dated 19.04.2022 to the appellant and appointed respondent no. 3 as inquiry officer, followed by serving a charge sheet. (Copy of the statement of allegations and that of the charge sheet are annexure 5-1 & 5-2 respectively)
- 7. That the inquiry officer/ respondent no. 4 proceeded with inquiry and asked the appellant to submit written statement instead of personal

hearing, which the appellant provided denying all the allegations levelled in the complaint. (Copy of written statement/ reply to allegations is annexure **E**)

- 8. That it is pertinent to mention here that the subject issue/allegations were withdrawn/ compromised by the complainant through intervention of local Jirga and it was requested through the said compromise that the disciplinary proceedings may be dropped but even then respondents pursued the matter unilaterally and out of personal whims against the appellant. (Copy of the compromise deed is annexure)
- 9. That during the so called inquiry proceedings, the inquiry officer/
 respondent no. 4 acted in sheer disregard of impartiality and honesty
 when he deviated from the sole charge of use of Abusive Language
 in the statement of allegation/charge sheet and went astray and out of
 the way to add other/ previous allegations which were never
 accumulated in the charge/ statement of allegations by the competent
 authority against the appellant hence travelled beyond his allotted
 jurisdiction by holding the appellant guilty as charged.
- 10. That upon presentation of the so called inquiry report to respondent no. 3, a final show cause notice was issued against the appellant and the appellant was again asked to submit a written statement instead of personal hearing, which the appellant did. (Copies of the final show cause notice and reply thereof are annexure and H^{*} respectively)
- 11. That upon the receipt of the said reply, respondent no. 3 passed the final impugned original order dated 19.05.2022 whereby the appellant was astonished to see that the original charge of use of

abusive language only with an individual was converted into blasphemy and inciting riots which never formed any part of the statement of allegations forming the charge sheet against the appellant and hence was reduced in rank from SI in BPS-14 to ASI in BPS-12 in sheer disregard of the law, rules and principles of justice and equity with special reference to FR-29. (Copy of the original impugned order is annexure **J**)

- 12. That the appellant impugned the above said order through a departmental appeal before the appellate authority/ respondent no. 2 but he too without looking into the matter fairly, dismissed the departmental appeal vide impugned appellate order dated 28.06.2022. (Copy of the impugned appellate order is annexure.)
- 13. Feeling aggrieved by the above, the appellant now approach this honourable court for setting aside the impugned orders on the following inter alia grounds;

GROUNDS

- a. Because the impugned original order dated 19.05.2022 and appellate order dated 28.06.2022 are against the law, equity and facts hence not tenable.
- b. Because the impugned orders are against the fundamental rights and service security guaranteed by the constitution.
- c. Because the impugned orders are arbitrary, whimsical, perverse, non-speaking and violative of the service laws and rules, principles of natural justice and have resulted in grave injustice to the appellant.

- d. Because the respondents have travelled beyond the charge sheet/
 statement of allegations framed against the appellant and have
 introduced altogether new issues during and after the so called
 inquiry proceedings. The unqualified addition of blasphemy
 being a very serious crime and requiring stringent proof speaks
 loud of the ill-will, whims and personal vendetta on the part of
 the concerned respondents against the appellant.
- e. Because respondent no. 4 being inquiry officer did not bother to conduct forensic analysis of the alleged material and no investigation whatsoever was conducted to verify the voices of the parties to dispute, ownership of their cell numbers and context of the alleged abusive language charged against the appellant, hence the inquiry being against the law, incompetent, without any proof and based on surmises and conjectures is not at all qualified to be relied upon for imposing a major punishment of reversion to a lower grade.
- f. Appellant seeks permission to agitate further grounds at the bar.

It is, therefore, most humbly prayed that on acceptance of this appeal, the impugned original order dated 19.05.2022 and appellate order dated 28.06.2022 may be set aside and the appellant may be reinstated to his actual rank of SI in BPS-14 with all back and future benefits, along with any other relief deepred appropriate please.

----Appellant

Through

Jehangir Khan Mohmand Advocate High Court.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SA No:	/2022			
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Najaf Ali	• • • • • • • • • • • • • • • • • • • •	•••••••	A _J	opellant
	Versu	IS.		
Khyber Pakhtunkhy	wa Police throu	ugh Inspector	General of P	olice,
KPK Peshawar and	others	*****		Respondents

AFFIDAVIT

I, Rajab Ali s/o Sharbat Ali R/o Sarpakh P.O. Sadda, Kurram District do hereby affirm and declare on oath that the contents of the accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Identified by:

Jehongin Khom aldmind Advocate. Depondnt

<u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>PESHAWAR</u>

SA No:/2022	•
Najaf Ali	Appellant
Versus	
Khyber Pakhtunkhwa Police throu	gh Inspector General of Police,
KPK Peshawar and others	Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Najaf Ali s/o Sharbat Ali R/o Sarpakh PO Sadda, Kurram District

RESPONDENTS:

Khyber Pakhtunkhwa Police through,

- 1) Inspector General of Police, KPK Peshawar.
- 2) Regional Police Officer/ DIG Kohat Region, Kohat.
- 3) District Police Officer, Kurram District.
- 4) Inquiry Officer/ SP Investigation Kurram

Appellant

Through

Jehangir Khan Mohmand Advocate High Court.

KURRAM POLICE AS STOOD ON 2019-20 & 21.

S.#	P No	Name of Officer	Parentage	D.O.B	Date of	Date of
					Appointment	Promotion
1	670881	Najaf Ali	Sharbat Ali	1966	01.07.1984	11.01.2017
2	671039	Niaz Muhammad	. Sabir Khan	1964	01.08.1084	11.01.2017
3	670846	Ashiq Ali	Muhammad Hassan	1968	01.10.1984	11.01.2017
4	670785	Nazir Hussain	Wazir Ali	1966 .	01.07.1985	11.01.2017
5	670785	Siraj-U-Din	Sahib Din	1971	01.07.1985	11.01.2017
6	670600	Kafoor Khan	Saleem Khan	1966	01.09.1985	11.01.2017

Total sanction post of Inspector (Subedar Major) BPS-16	04
Total filled	01
Vacant post of inspector (Subedar Major)	03/

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- & Official Concerned.

Deputy Commissioner Kurram Tribal Histrict

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OFFICE OF THE DEPUTY COMMISSIONER KURRAM TRIBAL DISTRICT

No. 10081-84/Kurram Levy dated 18/08//2018

ORDER

Subedar Najaf Ali, is hereby directed to assume the charge of post of Incharge SM kurram Levy Force in Upper Kurram Sub Division with immediate effect on the best interest of public service.

Deputy Commission Kurram Tribal District

No and date to even

Copy forwarded to the:

- 1. Assistant Commissioner, Upper Kurram.
- 2. TM Kurram.
- 3. Political Naib Tehsildars Upper Kurram.
- 4. Official Concerned.

Deputy Commissioner Kurram Tribal District



NOTIFICATION

Peshawar dated the, 14/9/2020

No.SO(Police)FID/SMY 2019 Merged Area/ 403-13 In pursuance of the provisions contained in section 9 of the Khyber Pakhtunkhwa Levies Force Act. 2019 (Khyber Pakhtunkhwa Act No.XXXV of 2019 read with rule 3 of the Levies Farce (Absorption in the Khyber Pakhtunkhwa Police) Rules, 2019, the Home and Tribal Affairs Department, with the prior approval of the Cabinet and on the recommendation of the Provincial Police Cifficer, hereby orders absorption of the following members of Levies Force of Kurram Tribal District in the Chyber Pakhtunkhwa Pol.cc with effect from the date of the initial appointment of the said members:

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	S.#	hame			Absorbed
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	2. 2	Niuz Alahammad	Raham Din	SUB BS-13	SI-BS:14
	-3.	Ashiq Ali	Muhammad Hassan	SUB BS-13	E HS WAR STREET
		Transaction of the Committee of the Comm	Sahila Din	Land Beals	The second secon
	4.94		AVazir Ali	SUB-BS-13	SI BS 14
		Nazir Hussain	Salim Khan	SUB BS-15	SI-BS34
	6.	Knfoor Khan	Lawrence and the second	NISUB BS-11	A STEBS-TIME STATE AND
	7	Nacem Hassan	Ali Fnoir	NSUB BS-11	ASIBS-III TO ME
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1			Haidar Ali	NISUB BS-11	
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OFFICE OF THE DISTRICT POLICE OFFICER

KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax: 0926-311354*Email:policekurram1@gmail.com

DISCIPLINARY ACTION

I ARBAB SHAFIULLAH JAN DISTRICT POLICE OFFICER KURRAM as competent authority, am the opinion that you SI Najaf Ali (Shoulder DSP Upper Kurram) have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (Amended 2014) as you have committed the following acts/omissions.

STATEMENT OF ALLEGATIONS

An application submitted by local media reporter namely Syed Zulfiqar Hussain alias Zulfi wherein he stated that Najaf Ali Shoulder DSP Upper Kurram used an abusing language on mobile call as the recording is also available in reaction of one post of an Police officer posting. Which is unacceptable for Police personnel.

For the purpose of conduct inquiry with reference to the above allegation SP Investigation Kurram is appointed as Inquiry officer. The inquiry officer shall in accordance with the provision of the 1975 Police Rule, an inquiry initiated against you. You are provided reasonable opportunity of hearing to the above official within (07) days of the receipt of this order, recommendations as to punishment or other appropriate action against the official.

The official shall join the proceeding on the date, time and place fixed by the inquiry officer.

ce Officer

Copy to the:

- 1. Regional Police officer Kohat Region Kohat, please.
- 2. SP Investigation Kurram:- The Inquiry Officer for initiating proceedings against the official under the provision of Police Rule 1975.
- 3. Official concerned:- with the direction to appear before the Inquiry Officer on the date, time and place fixed by him for the purpose of inquiry proceedings.

e Officer District Po



12

OFFICE OF THE DISTRICT POLICE OFFICER KURRAM, KHYBER PAKHTUNKHWA

D-2

Tel/Fax: 0926-311354*Email:policekurram@gmail.com

No. 951 /PA Dated Parachinar 19-4-2-22.

CHARGE SHEET

I ARBAB SHAFIULLAH JAN DISTRICT POLICE OFFICER KURRAM as competent authority under Khyber Pakhtunkhwa Police Rule 1975 (amended 2014), am the opinion that you SI Najaf Ali (Shoulder DSP Upper Kurram had rendered yourself liable to be proceeded against as you have committed the following act within the meaning of Rule of the Police Rules 1975.

An application submitted by local media reporter namely Syed Zulfiqar Hussain alias Zulfi wherein he stated that Najaf Ali Shoulder DSP Upper Kurram used an abusing language on mobile call as the recording is also available in reaction of one post of an Police officer posting. Which is unacceptable for Police personnel.

- 2. By reason of the above, you appear to be guilty of misconduct under the 1975 Police Rule (amended 2014 and have rendered yourself liable to all or any of the penalties specified in the Police Rules.
- 3. You are, therefore, required to submit your written statement within (07) days of the receipt of this charge sheet to the inquiry officer.

Your written defense if any should reached the inquiry officer within the specified period, failing which it shall be presumed that you have no defense to put in and ex-parte action shall be taken against you.

4. A statement of allegation is enclosed.

ATTESTED'

District Police Officer Kurram

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بیان نجف علی شاه DSP ایر کرم

بااقرار صالح بیان کرتاہوں کہ فاٹا سر جر کے بعد جب سے پولیس ضلع کرم میں آئی ہے روزاول سے سید ذوالفقار المعروف زلفی کرم پولیس کے پیچھے پڑا ہے اور کرم پولیس کو بے عزتی کرنے پر در پے ہے گئ بار میں ان کے ہاں گیا اور سمجھایا کہ وہ اپنی حرکات سے بازآ جائے لیکن وہ منظم سازش کے تحت اپنی کر تو توں سے باز نہیں آتا۔

سے ہیں DSP کر دعان کوانوسٹی گیشن سے ہیڈ کوارٹر DSP تعینات کیاجو کہ یولیس کے اعلیٰ آفسران اور تمام NDMS کے پولیس آفسران (سابقہ) کے مابین مرجرے پہلے 22 نکاتی ایجنڈا طے ہواجس میں کہا گیا تھا کہ ڈی پی اوکے علاوہ تمام سٹاف لو کل ہو گالہذاز لفی نے دانستہ طور پر کریمان ڈی ایس پی کی تقرری کا حکم نامہ سوشل میڈیا پر غلط انداز میں پیش کررہاتھا کہ اسے DSP آپریشن لگایا گیامیں نے اس کو سمجھایا کہ اگریہ آرڈر فاٹاخاصہ دار سمیٹی والے دیکھے تووہ دودن کے اندرآ کر اختجاج کرینگے لہذا Disinformation اور بیان بازی سے باز رہے لیکن وہ بصندرہاجس کی وجہ سے میر ااورائے مابین بمقام کچہری تلخ کلامی ہو کی باقی اور میں سیدزلفی نے موبائیل پر گالی گلوچ کاجو ڈرامہ رجایا تھاوہ صرف اور صرف میری نہیں بلکہ کرم پولیس کی بدنامی کرناچاہتا تھاجو کہ وہ روزاول سے کر ارہاہے میں نے موبائیل پر واٹس ایپ پر کوئی گندی زبان یا گالی نہیں دی ہے بلکہ سیرزلفی پہلے سے غلیط کاموں اورلو گوں کوبدنام کرنے کاماہر سمجھاجا تاہے کیکن پھر بھی وہ اپنے مقصد میں کامیاب ہوااور سوشل میڈیاپر گالی گلوچ شرکی کہ بیہ نجف علی اوراسکے برادرز نے کی ہے چونکہ

سوشل میڈیایر گالی گلوچ سے بولیس ڈییار شمنٹ کی بدنامی ہورہی تھی لہذا

which is the fall of the second antidiment of white dies of رئيدرا في فامر كو الدر الى فامر المده عرب رائد كر المراد الله مدار دارد و دارد و دارد و دارد و معام ارد و معام المرد و المعام المرد و المعام المرد و المعام المرد و المعام المرد و كر كه المرامة - عام مالزمم وار ديا هام ار المن ولد كم مامون م مرم وله م مرمان ار عزت كلي دن را ت محلة كرون

امن عاب مس معرومان مرحد شورام (100 مرد، ولا ،NAI) لافع وجل مرم ميں بن مولمين في مفام سندوع موا ادر نظ نظام نے سند ع ميں بولمن مر عرف من ليا سعدة والفقار المعروم ولعن فعرم ومدسرتم وملوسة بيدان و دورال مع ولسد ل كاركر و كي برسوالد - أيك ما مروع ك در برفسم ك ما و بريا و من و كا مرود مورى ما امر ممبورى مورة اس المعان ل من أوسيل كين . وبولس ل دعين ارسے ماز مندا فام س مرح مع الترس مارر ال ماس معن = الله ورج - La DSP- 40 / Jeves ost - 10080 - 4 port معن مدر و منعن م ١٥٥٠ م ١٠٠٠ علما لي سے صن رتم مرسر مسام Lie Lilie Us in DSP operations & July l'abortois של שול ל ל מתני שנה ול NMD של נינו עם א בו ל בו ל מו ל מים את ל ל و المن الما المراب من الما الرجع من الما المرابع المرابع المرابع المرابع المرابع المرابع المرابع المرابع على المراج الني الم MD عرن الرائد الدست " ناكر محمد الم مع PSP (OP) و معرف المعرف Contraction of the second With the second Vulkumparas Silvingencial CONTROLL CONTROL

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جناب عالى:

اس بارے میں معروض خدمت ہوں کہ 2019 میں دیگر NDMS کی طرح ضلع کرم میں پولیس کا نظام شروع ہوا اور نے نظام کے شروع میں یولیس مستحکم نہیں تھی لہذاسید ذوالفقار المعروف زلفی جو کہ سوشل ایکٹوسٹ ہے اس نے روزاول سے بولیس کی کار کر دگی پر سوالات اٹھاناشر وع کی اور ہر قشم کی بے عزتی پہنچانے میں کوئی کسر نہیں چھوڑی باامر مجبوری ہم نے اسکو سمجھانے کی کوشش کی لیکن وہ پولیس کی بےعزتی کرنے سے باز نہیں آیاجس کی وجہ سے اکثر ہمارے اوران کے در میان تعلقات کشیدہ رہے کچھ عرصہ قبل جناب ڈی بی اوصاحب نے ڈی ایس پی کریمان علی کو ڈی ایس پی HQ تعینات کیالیکن مذکورہ شخص نے ڈی پی او صاحب کو آرڈر غلط طریقے سے جان بوجھ کرسوشل میڈیا پر شائع کیااور لکھا گیا کہ کریمان علی کوڈی ایس پی آپریش تعینات کیا گیا آپ جناب کے علم میں ہے کہ فی الحال آفسران بالا NDMS بساتھ وعدہ کیاہے کہ Operational Seat پر کوئی نان لو کل نہیں لگایاجائے گااور جب سید زلفی کابیہ غلط خبر فیس بک پر شائع ہواتو مجھے اد ھر اد ھر مختلف NDMSسے فون کالز آئے اور میں نے انکو سمجھایا کہ کسی کو بھی (DSP (OPS نہیں لگایاہے بلکہ میں ہوں لیکن وہ زلفی کوضد کی خبر کو بنیاد بناکروہ میری بات پر اعتبار کررہے تھے لہذامیری ملاقات سیدزلفی سے کچہری کے مقام پر ہوئی اوراسے استدعاکی کہ آپ کی غلط خبر میرے مسئلے بنائے ہے لہذا آپ اپنے پوسٹ کو درست کرکے کریمان علی کو DSP ظاہر کرے نہ کہ (DSP OB) لیکن اس نے میرے ساتھ انتہائی بدتمیزی شروع کی اوراسی اثناء میں میرے اوران کے مابین سخت جملوں کااستعمال ہوالیکن بعد میں پتہ چلا کہ سیدزلفی نے واٹس ایپ اور سوشل میڈیا پر بھی نازیبا گالی گلوچ شئیر کرکے مجھ سے منسوب کیاجو کہ غلط اور بے بنیاد ہے نہ میں نے موبائیل پر گالی گلوچ کی ہے اور نہ ہی مجھے پتہ چلا کہ روزاول کی طرح سے ہمیں اس کیس میں پھنسایا گیا اورایک ذمہ دار پولیس اس طرح ذمہ داری کاسوچ بھی نہیں سکتا اور مجھے ان الزامات سے بری الذمه کیاجائے اور میں اس بارے میں آپ جناب سے Person Hearing کی درخواست بھی کرتا ہوں۔

ijuman-e-Hussanîa

Parachinar District Kurram



بارا چنار، ڈسٹر کٹ کرم

Ref No_

Date 20-04.

سيدز والفقار حسين عرف زفي (فريق دوم)

بَف على DSP ايركرم، رجب على برادر DSP (فريق اول)

فریقین بالا کے مابین عرصہ دراز سے دوئی چلی ہی تھی کہ تین یا جا رون پہلے فریقین کے مابین موبائل پر گفتگو کے دوران غیر ارادی طور پر ایک دوسر ہے وگالی گلوچ دی جس رِ فریقین کے مابین کشیدگی پھیل گئی اوران دونو ل فریقین کی آبس میں شکش ہے سوشل میڈیا پر دیگر Fake IDs والوں نے جلتی پر تیل چھڑ کا۔ چونکہ دونوں فریقین معزز خاندانوں سے تعلق رکھتے ہےاورہم مظران قوم نے دونوں فریقین کی وسیج مفادیس محوری سپریم کوسل (انجمن حسینیاور تحریک سینی) نے مداخلت کی اور کافی بحث ومباحثہ کے بعد دونوں فریقین نے ایک دوسر ہے کوتہدول سے معاف کیا اور دونوں نے اس دافعے کوغیرارادی قرار دیا اور دونوں فریقین آلیس میں بغل میر بھ

چونکہ معاملہ دوغاندانوں کے مابین باعث رنجش تھااور ہم مشران قوم نے معاملے وجڑ سے ختم کیا۔ لہذاہم مشران طوری قوم (پاراچنار سپریم کوسل المجمن حسینیداؤر تحریک حسینی) محکمہ پولیس کے IGP/DIG/DPO ہے التجاء کرتے ہے کہ فریق اول کے خلاف محکمانہ کاروائی حتم کیا جائے۔ تا کہ فریقین کے مابین امن بھائی جارے ک

فضاءقائم ركه سكے-

0926-310454

سيذذوالفقارعرف زلفي

و تخاصد رقر یک صینی مسیم محیار عربان از کا د تخاصد رقر یک صینی مسیم محیار عربان از کا

🔀 aehussainia@gmail.com

وتنط سيرفرى المجمن حسينه عنايت على المورى

Turi & Bangash Tribes

1) Duperzal 2) Ghundikhel 3) Ali Zal 4) Hamzakhel 5) Mastokhil 6) Bangash 7) Laisani 8) Badakhel 9) Hazara 10) Khushi



OFFICE OF THE

DISTRICT POLICE OFFICER KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax:0926-311354*Small:pollockurrammgmail.com

No. 1170 Dated Parachinar. 16 5: 76.2.2

FINAL SHOW CAUSE NOTICE:

1 Arbab Shaffullah Jan District Police Officer, Kurram an competent authority under Khyber Pakhtunkhwa Police Rules 1975 (amended 2014) is hereby serve you. Si Najaf Ali posted as acting DSP Upper Kurram district Kurram

Reference Disciplinary Action No. 050/PA dated 19.04.2022 and Charge Sheet No. 951/PA dated 19.04.2022,

That consequent upon the completion of Inquiry conducted against you by the Inquiry Officer/SP Investigation Kurrum vide No 333/SP/Inv:/Kurram dated 11.05.2022 for which you were given opportunity.

As per the inquiry findings of the Inquiry Officer, the material on record and other connected papers including your defense, the Inquiry officer recommended for major punishment and I am satisfied that you have proved guilty as charged against you.

As a result thereof I as competent authority have tenratively decided to

You are therefore, required to show cause as to why the aforesaid perfetty should not be imposed upon you also intimate whether you desire to be heard in person if no progress to this notice is received within [07] days of its delivery in the normal course of circumstances, it shall be presumed that you have no defense to put in and in that case exparte action shall be taken against you.



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OFFICE OF THE DISTRICT POLICE OFFICER KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax:0926-311384 gmail: policekurram@gmail.com No. 1170 Dated Parachinar 16/05/2022

FINAL SHOW CAUSE NOTICE

I, Arbab Shafiullah Jan District Police Officer, Kurram on complaint authority under Khyber Pakhtunkhwa Police Rules 1975 (amended 2014) is hereby serve you SI Najaf Ali posted as acting DSP Upper Kurram district Kurram.

Reference Disciplinary Action No. 951/PA dated 19.04.2022 and Charge Sheet No. 951/PA dated 19.04.2022.

The consequent upon the complaint of inquiry conducted against you by the Inquiry Officer/SP Investigation Kurram vide No. 333/SP/Inv/Kurram dated 11.05.2022 for which you were given opportunity.

As per the inquiry findings of the inquiry Officer, the material on record and other connected papers including your defense, the Inquiry officer recommended for major punishment and I am satisfied that you have proved guilty as charged against you.

As a result thereof I as competent authority have tentatively decided to impose upon you major penalty provided under rules ibid.

You are thereof, required to show cause notice as to why the aforesaid penalty should not be imposed upon you also intimate whether you desire to be heard in person if no progress to this notice is received with in (07) days office of its delivery in the normal course of circumstances, it shall be presumed that you have no defense to put in and that case ex-parte action shall be taken against you.

In this regard, you are directed submit you apply of this notice within (03) days positively if failed or the undersigned was not satisfied from your reply. This order shall be taken against you as per police rules.

جضور جناب و پی انسپکر حبزل بو کیس کوباث رین کوباث

عنوان: ڈیپارٹمنٹل ائیل برائے منسوخ کرنے محم جناب DPOصاحب OB: 179 محرر 2022-05-19 جسمیں سائل کوسب انسپکڑسے تنزلی کرکے اسٹنٹ انسپکڑ بنایااور حکم مجاربہ میں تمام زمینی تفائق اور قانون کو بری طرح من کیا میا۔

1. پير كه مين 1984 مين كرم ليوى فورس مين بجرتى موا-رفة رفة ترتى پاكر 2017 مين صوبيدار (SI) پروموك موا-

۔ یہ کہ 2018ء میں کرم لیوی فورس میں سینٹر ترین صوبیدار تھا۔ 25 ویں ترمیم کے بعد NMDsمیں پولیس کی آمدے ایک دن قبل سینئر میں کے دن قبل سینئر کی اللہ کی طرح IGP صاحب SP نے بھے DSP شولڈر لگایا۔ اور نہایت جانفشانی سے ڈیوٹی میں بناب IG/DIG صاحبان نے CC I, CC II ورسر مینکشس سے بھی نوازا۔

پولیس آمد کے اوائل میں پولیس کو سخت ترین حالت کاسامنا تھالیکن دن رات ایک کرکے نئے نظام کو پیٹڑی پر ڈالنے میں کامیاب ہوئے۔

4. سید ذولفقار المعروف زلفی جو که میڈیار پورٹر ہے۔ روز اول سے پولیس کا سخت مخالف رہا۔ نظام نیا تھا کیکن سید زلفی نے پولیس کی بدنامی میں کوئی کسر نہیں چھوڑا۔ بار بار سمجھا یا کیکن ایک منظم سازش کے تحت وہ پولیس کی بدنامی پر تُلاتھا۔ کیکن جسکی وجہ سے ہمارے تعلقات کشیدہ رہے۔

5. بمور خد: DPO-4-2022 جناب DPO صاحب نے ریگولرپولیس کے ایکنٹک DSP کرمان علی کو DSP - HQ لگایا۔ لیکن سیدز لفی نے اپنے فس بکٹ بیچ پر اِراد ٹاغلط خبر شائع کی کہ کرمان علی کو DSP آپریشنز لگایا گیا۔

6. میں نے سید زلفی سے کہا کہ پوسٹ کو صیح کرے لیکن اُس نے درست کرنے کی بجائے اُلٹا دھمکی دی۔ کہ میں صحافی ہو اور صحافی کیساتھ پنجہ آزمائی نہ کرے ورنداچھانہیں ہوگا۔ اس بات پر میرے اور اُس بے مابین معمولی تلح کلامی ہوئی اور بات ختم ہوئی۔

- رات کو دوستوں نے کال کرمے خبر دی کہ سیدز لفی نے میر ااور میرے بھائی کا تصویر لگا کر آپ کے اور آپ کے بھائی رجب علی کی کالی واش آپ ا فبس بک پر نشر ہور ہی ہے۔ جو کہ بری بات ہے۔ جب ہم نے فس بکٹ دیکھا تو سیدز لفی نے منظم سازش کے تحت نازیبا کالی گلوچ ریکارڈ کی تھی اور اس پر لکھا تھا کہ DSP اور اسکا بھائی بچھے کالیاں دے رہا ہے۔ چو نکہ پولیس افسر ان کے خلاف سے قدم مناسب نہ تھا لہذا نا کردہ گناہ پر مشران نے مجھ سے رابطہ کیا۔ سیدز لفی کو بھی بلایا اور ہمیں اکھٹا بٹھا کر سمجھایا۔ اور گلے شکوے دور کرکے ایک دوسرے کو تہد دل سے معاف کیا اور راضی نامہ میں میرے اور سیدز لفی کے دستخط کیسا تھ ساتھ یارا چنار سپر یم کو نسل کے مشران نے بھی دستخط کئے اور معالمہ ختم ہوا۔
- 8 جناب DPOصاحب نے میرے خلاف محکمانہ کاروائی شروع کی۔ میں نے Personal Hearing کی استدعا کی۔ کہ مجھے سننے موقع دیا جائے لیکن DPO نے سننے بغیر مجھے IS سے ASI منایا۔ جو کہ آئین پاکستان اور قانون کی تعلم کھلاخلاف ورزی ہے۔
- 9 جناب DPO صاحب کو چاہئے تھا کہ جب اس جعلی معاملے کو قوم کے مشران نے ختم کیا۔ تو DPO تصفیہ شدہ معاملے کو دوبارہ نہ چیٹر تا لیکن و مثل میں میں نے سرکاری ڈیوٹی میں کئی منظم سازش کے تحت DPO نے مجھے سیٹ سے ہٹانے کیلئے یہ سارا پراگرام کیا حالانکہ ان 38 سالوں میں میں نے سرکاری ڈیوٹی میں کئی ۔۔۔ و شمنیاں مول لی ہے۔ اور اب میر ااپنا محکمہ میرے پیچھے پڑا ہے۔

التباء: -زمینی حقائق کی اور ہے اور ہم سے منسوب کردہ کالی گلوج جس کا ہمیں خرر تہیں ہے کچھ اور ہے۔

لبذا عا بزانه استدعا ہے کہ میری 38 سالہ خدمات کو مذ نظر رکھ کر حکم جناب DPO صاحب OB: 179 بمور خد: 2022-05-19 کو

ATTESTED

منسوخ قرار دے کر مجھے دوبارہ SI کی سیٹ پر جملہ سابقہ مراعات کیساتھ بحال کیاجائے۔ م

سائل نجف علی ASI / Acting DSP کرم

(10) شرار ، فاشو منو کار من فحد پر حرف برالزام تفائم مرت سیدد دالفقار مداری دیور کو والس اب برگانی دی جو مکن زمود کرن میت رندوری آمنر نا مجد پر مزید الزامات که بوشی ا نبار نعاً یکی بر عس کا م تو شوکا ز مین که رید اور نه فائز شو کار عمی و فاکم مین عمفائی پیش کرتا .

الله الحقط مكنس عربوار عدد الله ا

POLICE DEPTT:

KOHAT REGION

ORDER.

This order will dispose of a departmental appeal, moved by ASI Najat Ali (Ex-SI) of district Kurram against the punishment order, passed by DPO Kurram vide OB No. 179, dated 19.05.2022 whereby he was awarded major punishment of reduction from the rank of SI to ASI on the allegations of using abusive language with one Syed Zulliqar (Media Reporter) recording of which is also available with him.

He preferred appeal to the undersigned, upon which comments were obtained from DPO Kurram and his service record were perused. He was also heard in person in Orderly Room, held in this office on 28.06.2022. During hearing the appellant did not advance any plausible explanation in his defense to prove his innocence.

I have gone through the available record which indicates that the allegations leveled against the appellants are proved beyond any shadow of doubt. Moreover, the appellant has blemished service history and a number of times he has been awarded various punishments including discharge from service, but he did not mend himself. The competent authority has already taken a lenient view while awarding punishment to him Therefore, in exercise of powers conferred upon the undersigned, his appeal being devoid of merit is hereby rejected.

Order Announced 28.06.2022

(TAHIR AYUB KHAN) PSP

Region Police Officer, Kohat Region.

dated Kohat the

Copy to District Police Officer, Kurram for information and necessary action w/r to his office Letter No. 562/SRC, dated 15.06.2022. His Service Record is returned herewith.

Encl S. Book-? Enguy File (36 Pages)

Region Police Officer,

& Kohat Region.



OFFICE OF THE DISTRICT POLICE OFFICER KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax: 0926-311354*Email:policekurram@gmail.com

Reference this office Disciplinary Action No. 950/PA dated Parachinar 79.04.2022, Charge Sheet No. 951/PA dated Parachinar the 19.04.2022 and final Show Cause No. 1170 dated Parachinar 16.05.2022 with the following charges as "An application submitted by local media reporter namely Syed Zulfiqar Hussain alias Zulfi wherein he stated that SI Najaf Ali used an abusing language on mobile call as the recording is also available in reaction of one post of an Police officer posting which is unacceptable for Police personnel".

That consequent upon the completion of inquiry conducted against you by the officer for which you were given opportunity vide Inquiry No. 333/SP/Inv/Kurram dated 11.05.2022.

On going through the findings and recommendations of the inquiry officer, the material on record and other connected papers including your defense the inquiry officer I am satisfied that you have proved guilty as charged against you.

The inquiry has completed by the inquiry officer and you have given complete opportunity to defense yourself before the inquiry officer.

On the completion of inquiry No. 333/SP/Inv/Kurram dated 11.05.2022, by inquiry officer and determined the facts from statements and evidences that SI Najaf Ali committed blasphemy which feared riots amongst the Sayed/Pasintoon and Shia/Sunni. As a result of the blasphemy, an attack of hand grenade has also took place on the house of him on 22.4.2022 and case registered No. 74 dated 22.4.2022 u/s 324, 3/4 Exp PS Upper Kurram. This has proved him guilty and extremely violated the discipline of Police. The Inquiry officer recommended him for major punishment and the statement was also recorded by SI Najaf Ali in compliance with the final Show Cause notice No. 1170 dated Parachinar 16.05.2022 which is not satisfied.

Similarly, an another inquiry No. 350/SP/Inv:/Kurram dated 19.05.2022 conducted by SP Investigation and as per inquiry report has also found guilty for abusing language with Jamshid Ali monitoring officer BISP programme, Parachinar.

I Mr. Arbab Shafiullah Jan District Police Officer Kurram as competent authority under Khyber Pakhtunkhwa Police Rule 1975 amended vide notification No. 3859/Legal, dated 27.08.2014 issued by IGP, KPK SI Najaf Ali is hereby reduced the rank from Sub Inspector to Assistant Sub Inspector in the same time scale of pay with immediate effect

> District Po ce Officer Kurlam

> > ATTESTED

OB. No. 17 Dated 19.05.2022 Copy forwarded to the:

1. Regional Police officer Kohat Region Kohat.

2. SP Investigation Kurram Police w.r.t his Inquiry cited above.

3. District Account officer Kurram.

4. All DSPs/SHOs in Kurram.

5. RI/SRC/Pay Officer/OASI Kurram Police for necessary action on their part.

6. Official concerned

District Phice Officer



OFFICE OF THE DISTRICT POLICE OFFICER KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax: 0926-311354*Email:policekurram1@gmail.com

OFFICE ORDER.

As Si Najaf Ali shoulder DSP Upper Kurram is under inquiry so, he is closed to Police Line Parachinar with immediate effect.

SI Mazhar Ali is hereby directed to look after as DSP Upper Kurram till further order.

District Police Officer Kurram

OB No. 145 Dated 19.04.2022

No. & date is even:

Copy forwarded for favor of information to the:

- 1. Regional Police officer Kohat Region, Kohat.
- 2. SP Investigation Kurram.
- 3. All DSPs in Kurram.
- 4. All SHOs in Kurram.
- 5. Official concerned

District Police Officer Kufrum

ATTESTED





DISTRICT HEAD QUARTER HOSPITAL PARACHINAR **KURRAM MERGED AREA**

Phone office 0926 311468 Email. msahqpcr468@gmail.com.

MEDICAL CERTIFICATE.

It is certified that I examined Mr Najaf Ali S/O Mr Sharbat Ali resident of Parachinar District Kurram to day on 19th July 2022 vide Emergency NO 3830. He has low back pain and is advised a complete Bed rest for one month besides medications

for his better recovery.

Orthopedic Surgeon

DHQ Hospital Parachinar.

Countersigned

Datearachinar /20

ابنالئ اطلاعي رورط

فاين ابتراني اطلاع نسست مرم قابل دست الذارى بوليس دبورط تندو ديرد تعربه المجموع منا بطرفو جادى

عدان معزم

عَارَكُ ووقت وقوع من المدين المدين 74 1

21301-2241381-5 cos 22 4 in prombe es وسحينت اطلاع ومنماث ومتينث

0303-9529788 Japine 11 Cumus 18 Cale

يّنة جرم (مورفع) حال الركيديا كيابو PP. 324-427-148-119-3, EXP فادتوع فاصله تقادست ادرسيت

केंग्ये राविषा की प्रांत हैंग्ये केंग्ये किया कार्य दिया

اوسكوينت ملزم والى يوتفيش كم متعلق كالحمرة الراطسلاع درج رين توقف موابوتو وجربيان موو-

- 1000 01 pm 10 1000

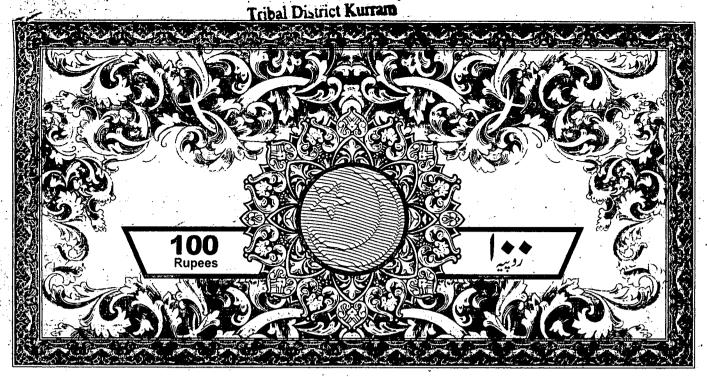
نانه <u>سر</u> روانگی کی تاریخ و وقت

البت لائ اطلاع ني درج كرو به وثن أبه كرب مرام من فرال مع ما و

مرساد كري زان وعولي ويولي . تورك . الله على من والمرام رام في برا ع الله مِنْ وَاللَّهُ وَاللَّهُ وَاللَّهُ وَمِنْ اللَّهُ وَمِنْ اللَّهُ وَمِنْ اللَّهُ وَمِنْ اللَّهُ اللَّهُ وَاللَّهُ اللَّهُ وَمِنْ اللَّهُ اللَّهُ وَمِنْ اللَّهُ اللَّهُ وَمِنْ اللَّهُ اللَّهُ وَمِنْ اللّلَّ اللَّهُ وَمِنْ اللّلَّ اللَّهُ وَمِنْ اللّلَّ اللَّهُ وَمِنْ اللّلَّالِي مِنْ اللَّهُ وَمِنْ اللَّهُ وَمِنْ اللَّهُ وَمِنْ اللّ ر مور به مدين ورن دون الله دون مورد به 188 و 188 من مورد و مورد و راس مورد و مورد الله الماء مورد الله المورد و 188 المورد - 190 و مورد الله المورد - 188 المورد - 190 و مورد الله المورد - 190 المورد مَا يَ فُورِسِي فُورِسِيرِه في سَمْوَيْنَ وَوَعِمْ مِن مَا بِرِي لِلْمُ اللَّهِ اللَّلَّالِي اللَّهِ اللَّ من الله من المرام المراب الله على المراب الم المرا مند من المرا الله الله الله المرا ال من المعدد من المعدد المراسلة المراس ا رسان تر دساور سع باز قسد فاع در در از از ان مراور انده در از و دستورتران مناورس שנות ניעו בעם לעור על נוני בי לעל בני בנים לעל בנים בעל בי על בי על בי בי בי בי ל ל ל ל נונים לבי ל נונים לבי ביוצג נובו בינים ישל של לוני מינטותו ב שתובים עון עלט למונו וים The said of go in the said of the should be de und in the رع زور ما ما ما مع مرود ما المعالم الم

ATTESTED

-0000 11111-4-022District Account Officer



مختیار نامه خاص برائے پیروی مقدمه

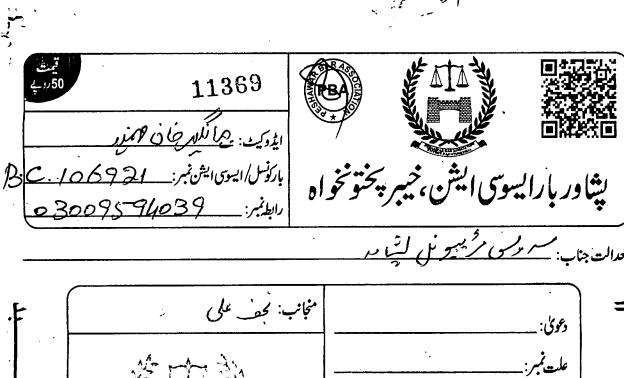
مئد (۱) بخیف عملی و کرر کر سریت عملی کے سین میں ہوائے پیروی مقدمہ بازانیل کرم

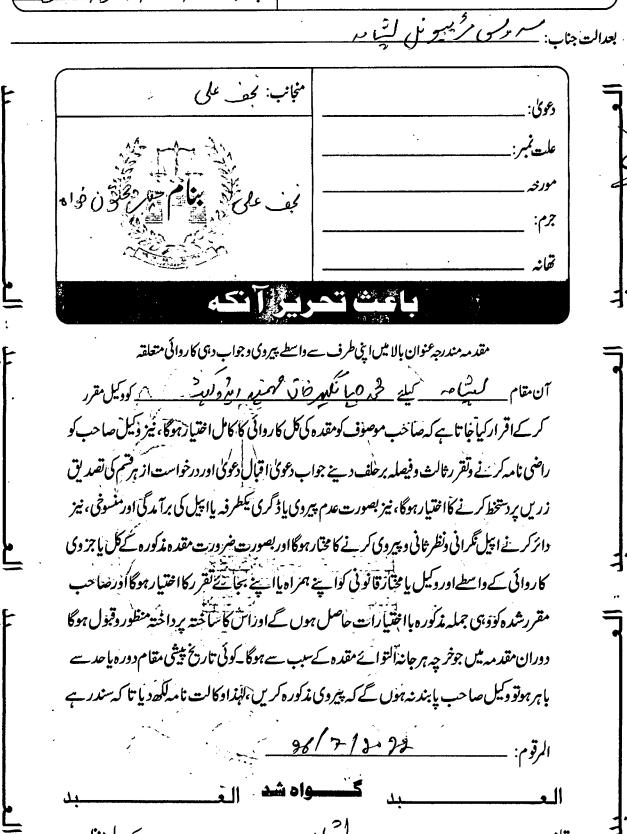
در یوفق بقائی حق وحاص اقر ارکر کے کلودیت ہیں کہ ہمارا ایک مقدمہ زیساعت ہے جس میں بوجہ بیاری از خودعد الت حضور میں پیش ہونے ہے قاصر ہیں ۔ لہذا اپنی جانب سے سی محموم عملی و کر سے مقدمہ کی بیروی کرے ، میان دیوے ، راضی نامہ کرے ، جواب الجواب داخل کرے ، مقدمہ اییل داخل کرے ، ویک مقرم کے بیان حافی جمع کرے ، شہادت دیوے ، درخواست جواب درخواست دیوے نیز جملہ کاروائی جو وقا فو قاضروری ہوکرنے کا نجاز ہے۔ اییل نگرانی نظر خانی کرے ، مقدمہ بے دخلی دائر کرے ، اجراء کرے ، عذرداری داخل کرے ، خوراکہ داخل کرے اور خلاف دائر شدہ مقدمات میں بیروی اور جواب دی وغیرہ داخل کرے اور کن اختیارہ ہندہ اس کی بابندر ہے گا۔

مختیار موصوف عدالت ابتدائی سے تاعدالت عالیہ وسپریم کورٹ آف پاکستان میں کاروائی ہماری جانب سے کرنے کا مجازے۔ لہذا مختیار نامہ خاص بحق ۔ **مرجب عمر کم کر مرجب عمر کم ک**ر سسک**ند کھی کر جال کیسٹر**۔ یاراچنارضلع کرم دیا تا کہ سندار ہے اور بوقت ضرورت کام آئے۔

شاختى كارۇنبر كـ 1363-635 و 1303-967247 ك شاختى كارۇنبر كـ 1363-6356 ك 1303-967247

ATTES





کے لیے منظور

نوك:اس دكالت نامه كي فو نُو كا بي نا قابل قبول موكى _