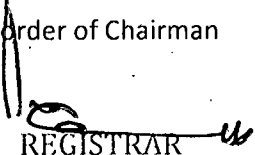


Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1294/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/09/2022	<p>The appeal of Mr. Shakeel Anwar presented today by Mr. Fazal Shah Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 1294 /2022

Shakeel Anwar.....Appellant

V E R S U S

CCPO and others.....Respondents

I N D E X

S.No	Description of Documents	Annexure	Pages
1.	Service Appeal with affidavit		1-4
2.	Application for condonation of delay with Affidavit		5-6
3.	Copies of Medical Chits	A	7-8
4.	Copy of Order dated 15-11-2017 & departmental appeal	B & C	9-10
5.	Copy of Order dated 27-11-2017 & departmental appeal	D & E	11-14
6.	Copy of inquiry report	F	15-16
7	Vakalat Nama		17

Dated: 01-09-2022

Through

Appellant

Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan

OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar Cell# 0301 8804841
Email:- fazalshahmohmand@gmail.com

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 1294/2022

Shakeel Anwar, Ex Constable No 241, Capital City Police Peshawar.

.....Appellant

V E R S U S

1. Capital City Police Officer, Peshawar.
2. Superintendent of Police Headquarters, Peshawar.
3. Provincial Police Office Khyber Pakhtunkhwa, Peshawar.

.....Respondents

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 15-11-2017 AND ORDER DATED 27-11-2017 OF RESPONDENT NO 2 WHEREBY THE APPELLANT HAS BEEN DISMISSED FROM SERVICE AND AGAINST WHICH DEPARTMENTAL APPEAL OF THE APPELLANT HAS NOT BEEN RESPONDED SO FAR DESPITE THE LAPSE OF MORE THAN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:-

On acceptance of this appeal the impugned Orders dated 15-11-2017 & Order dated 27-11-2017 of respondent No 2 may kindly be set aside and the appellant may kindly be ordered to be reinstated in service with all back benefits.

Respectfully Submitted:-

1. That the appellant was enlisted as Constable in District Police Peshawar and since enlistment, the appellant performed his duties with honesty and full devotion and to the entire satisfaction of his high ups.
2. That in the month of May 2017, the appellant while posted to Police Lines Peshawar, the appellant fell ill and was unable to have performed his duties, therefore visited the medical officer who advised him medicines and bed. **(Copies of Medical Chits are enclosed as Annexure A).**
3. That in the meanwhile the appellant was dismissed from service by respondent No 2 on the allegations of absence from duty w.e.f 09-08-2017 till date of dismissal and taking debit from many persons through fraud vide Order dated 15-11-2017, against which the appellant filed departmental appeal before respondent No 1 on 15-04-2022 which has not been responded so far despite the lapse of more than the statutory period of ninety days. **(Copy of Order dated**

15-11-2017 & departmental appeal are enclosed as Annexure B & C).

4. That strongly just after about eleven days, another order was issued by respondent No 2 whereby the period of absence from 03-05-2017 to 05-07-2017 was included in the dismissal order vide order dated 27-11-2017, against which also the appellant filed departmental appeal before respondent No 1 on 30-06-2021 which has not been responded so far despite the lapse of more than the statutory period of ninety days. **The appellant also approached respondent No 3 by filing revision petition which was filed. (Copy of Order dated 27-11-2017 & departmental appeal is enclosed as Annexure D & E).**
5. That the impugned Order dated 15-11-2017 & order dated 27-11-2017 of respondent No 2 are against the law, facts and principles of justice on grounds inter-alia as follows:-

G R O U N D S :-

- A. That the impugned Orders are illegal, unlawful, without lawful authority and void ab-initio.
- B. 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.
- C. That the impugned order is in total disregard of the law on the subject and as such void ab-initio.
- D. That ex-parte action has been taken against the appellant and has been condemned unheard.
- E. That the allegations leveled against the appellant were never substantiated as no one was examined in its support, thus the appellant has been punished for no fault on his part.
- F. That ex-parte proceedings including inquiry has been conducted in violation of principles of natural justice. **(Copy of inquiry report is enclosed as Annexure F).**
- G. That even mandatory proceedings in case of absence were never conducted, thus too the impugned orders are liable to be set at naught.



- H. That even if the allegations are presumed to be true, even then the impugned orders are not tenable as taking debt from someone is not misconduct and even except one Khaista Gul no one has complained against the appellant.
- I. That the alleged absence was not willful and deliberate rather was due to circumstances compelling in nature.
- J. That no charge sheet and show cause notice were communicated to the appellant.
- K. That the appellant was not afforded the opportunity of personal hearing in violation of Article 10 of the Constitution.
- L. That the impugned order is void as the law and rules nowhere provide and empowered the authority to revise its order.
- M. That since illegal dismissal from service, the appellant is jobless.
- N. That the appellant seeks the permission of this honorable tribunal for further/additional grounds at the time of arguments.

It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.

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

Dated:-01-09-2022

Through

Appellant



**Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan**

LIST OF BOOKS

1. Constitution 1973.
2. 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.

ADVOCATE 

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No _____/2022

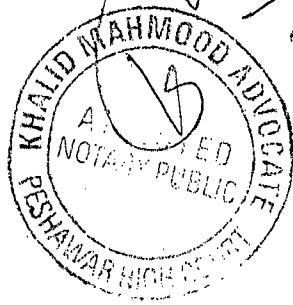
Shakeel Anwar.....Appellant

V E R S U S

CCPO and others.....Respondents

AFFIDAVIT

I, Shakeel Anwar, Ex Constable No 241, Capital City Police Peshawar , do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.



DEPONENT

17301-1811545-5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No _____/2022

Shakeel Anwar.....Appellant

V E R S U S

CCPO and others.....Respondents

Application for condonation of delay if any

Respectfully Submitted:-

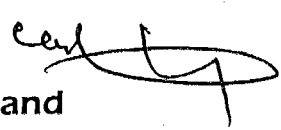
1. That the accompanying appeal is being filed today in which no date of hearing has been fixed so far.
2. That the grounds of appeal may be considered as integral Part of this application.
3. That since the impugned order is void ab-initio being passed in utter violation of law and rules on the subject and even the the impugn order was not communicated to the appellant in time rather the appellant obtained copy of the same through his own efforts on 18-02-2022 and as such the instant appeal is as such well within time furthermore lis are to be decided on merit instead of technicalities. .
4. That no evidence of any sort has been collected in support of the allegations besides departmental appeals of the appellant are still pending before respondent No 1.
5. That law as well as the dictums of the superior Courts also favors decisions of cases on merit.

It is therefore prayed that on acceptance of this application, the delay if any in filing of appeal may kindly be condoned.

Dated:-01-09-2022


Appellant

Through:


Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No _____/2022

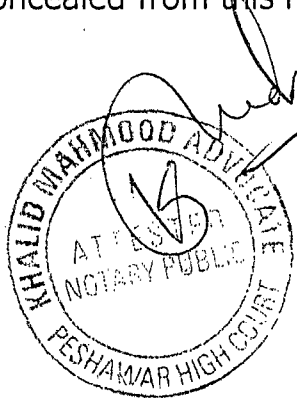
Shakeel Anwar.....**Appellant**

V E R S U S

CCPO and others.....**Respondents**

AFFIDAVIT

I, Shakeel Anwar, Ex Constable No 241, Capital City Police Peshawar, do hereby solemnly affirm and declare on oath that the contents of this **Application**, are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.



DEPONENT

17801-1811545-5



OUTPATIENT DEPARTMENT (OPD)
 Lady Reading Hospital
 Medical Teaching Institution,
 Peshawar - PAKISTAN

"A"
 7.

Amount Paid: 20
 Invoice: ko8947953749799
 Invoice Date: 03-May-2017 11:24:55
 OPD No:

MRNo: ko63784678236862 Name: Shakeel Anwar
 Gender: Male Age: 30years District: Peshawar Pakistan
 Visit Type: Regular Department: Orthopedic

Room No 12

Operator : Hadi

Counter: OPD

Complaints:

Handwritten: *Handwritten notes in Complaints section*

Rx

Handwritten: *Tal. Bacter 1e1 2comp*

Findings:

Handwritten: *BP 120/90, BS 93*

Handwritten: *Tal. Aspirin 1e1 500mg*

Handwritten: *Tal. Lasco 500mg 40*

Investigations:

Handwritten: *Hb: 14.2, Urine, S. Ray, Spine*

Handwritten: *MS Bender, Lungs, Tal. Injection, S. W. 2015*

Vertical text: *HOSPITAL DIRECTOR, Lady Reading Hospital, Medical Teaching Institution, Peshawar*
MANAGER IN CHARGE, OPD & Ambulatory Serv, Lady Reading H, Peshawar

Diagnosis:

Handwritten: *Bacter. Flu, ...*

Handwritten: *Adeno (one) month, Lacer w.e. Jan 03/05/2017*

Handwritten: *Signature of Junior Registrar*
 JUNIOR REGISTRAR
 Orthopedic Unit
 Lady Reading Hospital Peshawar

Next Visit: *Handwritten date*

Consultant Name: _____ Signature: _____

Handwritten: *Handwritten notes at bottom left*

Handwritten: *Alisa*
Handwritten signature



OUTPATIENT DEPARTMENT (OPD)

Lady Reading Hospital
Medical Teaching Institution,
Peshawar - PAKISTAN

-8-

Amount Paid: 20
Invoice: ko784635763784
Invoice Date: 04-June-2017 10:32:44
OPD No:

MRNo: ko578637865783467 Name: Shakeel Anwar
Gender: Male Age: 30years District: Peshawar Pakistan
Visit Type: Regular Department: Orthopedic

Room No 12

Operator : Hadi

Counter: OPD

Complaints:

Penicillin 4
with Brevine
Pain

Findings:

BP: 125/90

Investigations:

Hb: 14.9
to Ray S
— pro

Diagnosis:

Baker's Bru.

Next Visit:

Rx

Tas Pictul
1-2, SR

Tee Nubad
1-1, Fuler

Tee Loric
1-1, 2000

Tee Evem
1-1, 4000

Tee Walum
1-1, 500

Admission 1 month Sick
4/06/2017

[Handwritten signature]

[Handwritten signature]

HOSPITAL DIRECTOR
Lady Reading Hospital
Medical Teaching Institution
Peshawar

MANAGER INCHARGE
OPD & Ambulatory Services
Lady Reading Hospital
Peshawar

JUNIOR REGISTRAR
Orthopedic Unit
LRH/MTI Peshawar

Consultant Name:

Signature:

[Handwritten signature]

ORDER

This office order relates to the disposal of formal departmental enquiry against Constable Shakil Anwar No.241 of Capital City Police Peshawar on the allegations that he while posted at Police Lines, Peshawar was called time & again in connection with enquiry/complaint but he deliberately avoiding appearance before the Enquiry Officer (DSP-HQrs) & also absented himself w.e.f 09.08.2017 till date.

In this regard, he was issued charge sheet and summary of allegations. Inspector Yousaf Jan of Police Lines was appointed as Enquiry Officer. He conducted the enquiry proceeding & submitted his report/finding that the alleged official violated Police Rules chapter 14-25 & chapter 14-33 as well as found guilty under section 118 (d) Police Act, 2017 fell in grievances by taking debt from many persons through fraud which resulted his absconding & absented from duty 09.08.2017. The E.O further recommended major punishment for defaulter official.

In light of recommendation of E.O & other material available on record the defaulter official found guilty of prolong absence & defaming the image of Police department in the eyes of general public. Therefore, he is hereby dismissed from service under Police & Disciplinary Rules-1975 with immediate effect. Hence, the period he remained absent from 09.08.2017 till date is treated without pay.

E (39)

[Signature]
SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR

OB. NO. 4154 / Dated 16/11/2017 *15-11-2017*

No. 5091-97 /PA/SP/dated Peshawar the 16/11/2017

Copy of above is forwarded for information & n/action to:

- ✓ Capital City Police Officer, Peshawar.
- ✓ DSP/HQrs, Peshawar
- ✓ Pay Office, OASI, CRC & FMC along-with complete departmental file.
- ✓ Officials concerned.

[Signature]
[Signature]

ORDER

This office order relates to the disposal of formal departmental enquiry against Constable Shakil Anwar No. 241 of Capital City Police Peshawar on the allegation that he while posted at Police Lines, Peshawar was called time & again in connection with enquiry/complaint but he deliberately avoiding appearance before the Enquiry Officer (DSP-HQrs) & also absented himself w.e.f 09.08.2017 till date.

In this regard, he was issued charge sheet and summary of allegations. Inspector Yousaf Jao of Police Lines was appointed as Enquiry Officer. HE conducted the enquiry proceeding & submitted his report/finding that the alleged official violated Police Rules chapter 14-25 & Chapter 14-33 as well as found guilty under section 118(d) Police Act, 2017 fell in grievances by taking debt from many persons through fraud which resulted his absconding & absented from duty 09.08.2017. The E.O further recommended major punishment for defaulter official.

In light of recommendation of E.O other material available on record the defaulter official found guilty of prolong absentee & defaming the image of Police department in the eyes of general public. Therefore, he is hereby dismissed from service under Police & Disciplinary Rules 01875 with immediate effect. Hence, the period he remained absent from 09.08.2017, till date is treated without pay.

-sd-

SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR

OB No. 4154/Dated 16.11.2017

No. 5091-97/PA/SP/dated Peshawar the 16.11.2017

Copy of above is forwarded for information & n/action to:

1. Capital City Police Officer, Peshawar
2. DSP/HQrs, Peshawar
3. Pay Office, OASI, CRC & FMC along with complete departmental file.
4. Officials concerned.

To

The Chief Capital Police Officer,
Peshawar.

-10-^{"c"}

SUBJECT: APPEAL FOR REINSTATEMENT OF SERVICES AT POLICE DEPARTMENT

Respected Sir,

With great reverence and esteem regards, it is submitted in your honour and to draw your kind attention that I have been rendering my services in the Police Department, Peshawar as Constable having Belt No. 241, in my professional career journey, I have been posted at different stations and always obeyed the commands of my seniors, during the period of my service I have performed my duties with full zeal & zest.

2. It is pertinent to mention here that I have been suffering from back pain since 2016. During the mentioned period, I have been remained under treatment of various doctors so as to cope up with such situation and was unable to continue my duties regularly. Furthermore, I was not in that state and condition to attend the duty regularly hence did not obtain proper leave as per the Rules and Policy. As of now, by the grace of Almighty Allah, I have been recovered from the disease by the help of medications and treatment. **(Medical Reports are enclosed at Anne-I)**

3. It is further to state that we have been victimized with antagonism during the period of my absentee and that was the major cause of being absented from the duty. In this context F.I.R was filled timely against the opponents which may be seen at **(Annex-II)**. This unfortunate conditions/situation and health disorder forced me to not resume my duty position, it was them unfortunately informed that I have been dismissed from position/post of Constable vide Order No. 4154/PA/SP/HQrs dated 16-11-2027. **(Copy is enclosed for ready reference at Annex-II)** It has been stated in the dismissal order that the dismissal have been made after fulfilling codal formalities which is not the fact. In fact, an Ex-Party enquiry has been carried out in a casual approach. No proper explanation, show-cause or enquiry proceedings were intimated to the applicant nor to any family member of the applicant. It is also mentioned in the dismissal order that I have been dismissed in the charges of debt from many persons through fraud & absented from duty which is not a fact and was a conspiracy against me submitted by the opponent through application, which I assure that these are not true and are false allegations except my absentee for which I apologize your kind authority. It is worth mentioning here that the applicant is a married person having 03 children and spouse which are fully dependent upon the applicant.

4. Keeping in view the above facts, it is humbly requested that the I may kindly be reinstated with all back benefits on my post on humanitarian and compassionate grounds so as to continue my duties regularly. Your kind support in the matter shall enable the applicant to start his new life along-with his family.

With highest regards.

Faithfully yours,

Dated: April 15th, 2022

Abid

(Shakeel Anwar)

Constable Belt No.241/ C.C.P

[Handwritten signatures]

"D"

-11-

ORDER

✓ 17/11/17

Constable Shakeel Anwar No.241 of Capital City Police Peshawar while posted at Police Lines, Peshawar has been drawn away from service by this office vide OB No.4154 dated 16.11.2017 on the charges of taking debt from many persons through threat & abduction from duty from 09.08.2017 till date.

Therefore, the absence period from 03.05.2017 to 05.07.2017 is hereby included in his dismissal order also.

13 (2)

[Signature]
SUPERINTENDENT OF POLICE
HEADQUARTERS, PESHAWAR

27-11-2017

OB NO. 41303/1
Dated 27/11/2017

No. F16L-21/PN/SP/HQrs dated Peshawar dt. 27/11/2017

Copies to:

- ✓ DSP/HQrs: Peshawar
- ✓ Pay Officer
- ✓ OAST, CRC & FMC along with complete departmental file
- ✓ Officials concerned.

[Signature]

[Signature]

Ad

To

The Capital City Police Officer
KPK Peshawar

Subject:-

DEPARTMENTAL APPEAL AGAINST THE
IMPUGNED ORDER DATED 27-11-2017 VIDE
ORDER NO. 4303, WHEREBY THE ABSENCE
PERIOD FROM SERVICE W.E.F 03.05.2017
TO 05.07.2017 INCLUDED IN HIS DISMISSAL
ORDER.

Prayers:-

On acceptance of this department appeal the impugned order dated 27-11-2021 vide order No. 4303 may kindly be set-aside and the appellant may kindly be reinstate on his service along with all back benefits.

Dear Sir,

Respectfully Sheweth

Facts:

1. That the appellant was appointed as Constable with respondent Department and after appointment the appellant perfume his duty with full devotion and hard work and no complaint whatsoever has been made against the appellant.

Sheweth
Ad

2. That while performing his duty with respondent department the appellant becomes ill with effect from 03.05.2017 to 05.07.2017 and beside that domestic problem has been arises to the appellant at the year 2017. (Copy of medical prescription is attached).

3. That after settlement the domestic problem of the appellant at the month of June 2021 the appellant visited to respondent department to perfume his duty whereby the appellant came to know that the appellant has been dismissed from service on 27.11.2017. (Copy of dismissal order is attached).

GROUND:

A. That the impugned order is against the law Rules and principle of natural Justice hence void-abinitio.

B. That the impugned order is illegal and void because it has been passed without fulfilling the codal formalities.

C. That no show cause notice and opportunity of personal hearing has been provided to the appellant.

Handwritten signature

D. That no charge sheet no statement of allegation has been issued or communicated to the appellant which is a clear cut violation of Rule 6 of Police Rule 1975.

E. That there is no reference of any complaint has been given in the impugned order dated 27.11.2017 and no statement of any complainant has been recorded by the inquiry officer.


It is, therefore, requested that on acceptance of the instant departmental appeal the impugned order dated 27-11-2017 may kindly be set aside and the appellant may kindly be reinstated on his service alongw with all back benefits.

Dated :- 30-06-2021


Shakeel Anwar No.241

0333-6511781

0321-9075581





بحوالہ کمپلیٹ انکوائری نمبری 3862 برخہ 15-08-2017 اور ریمانڈر نمبری 4067 موصولہ دفتر
 DSP ہیڈ کوارٹر محروم خدمت ہوں کہ کمپلیٹ ہذا میں غائب گل ولد زیارت گل سکنہ ہزار خوانی پشاور کا کنسٹیبل تشکیل انور
 نمبر 241 پر 2,80,000/- روپے بطور قرض دیئے گئے اور کنسٹیبل مذکورہ رقم واپس کرنے میں ٹال مٹول کرتا ہے اس
 لئے تھانہ پولیس لائن کے محرز کو بذریعہ پروانہ نمبری 615 ریڈر ا-LO مورخہ 17-08-2017 کو بغرض تحریری بیان
 لکھا گیا ہے کہ عدنان کو اطلاع دیا گیا ہے کہ مذکورہ کنسٹیبل نے بطور قرض دیئے گئے رقم واپس کرنے میں ٹال مٹول کرتا ہے۔
 مذکورہ کنسٹیبل کے گھری کے لئے بذریعہ سکوتی پتہ عدنان نمبری 615 ریڈر ا-LO مورخہ 21-08-2017 تھانہ
 گھرانہ پولیس لائن کو ایڈوانس پروانہ معلوم ہوا کہ مذکورہ کنسٹیبل بمعہ جملہ فیملی علاقہ تھانہ گلہار شفٹ ہوا ہے مذکورہ
 عدنان کی نمبر پروانہ ڈائری نمبر 628 مورخہ 24-08-2017 تھانہ گلہار ارسال کیا گیا ہے۔

مذکورہ پروانہ واپس پر معلوم ہوا کہ مذکورہ کنسٹیبل نے عدنان کو اطلاع دیا ہے کہ مذکورہ کنسٹیبل بغرض انکوائری دفتر
 سے اطلاع ہو جائے۔ لیکن مذکورہ کنسٹیبل ابھی تک عدنان آیا اور کسی قسم کا تحریری بیان بھی ارسال نہیں کیا گیا۔ مذکورہ
 عدنان کے نمبر پروانہ ڈائری نمبر 0313-5535024 پر بار بار کوشش کے باوجود نمبرات مسلسل

مذکورہ کنسٹیبل تشکیل آنور 241 متعلق پولیس لائن روپوش ہے بیان دینے سے گریز کرتا ہے۔ مذکورہ
 عدنان کے نمبر پروانہ ڈائری نمبر 0313-5535024 پر بار بار کوشش کے باوجود نمبرات مسلسل
 عدنان کے نمبر پروانہ ڈائری نمبر 0313-5535024 پر بار بار کوشش کے باوجود نمبرات مسلسل

لاٹن آفیسر

ملک سعد شہید پولیس لائن پشاور

پشاور

جناب عالی!

بحوالہ کمپلیٹ انکوائری نمبری 3862 مورخہ 15.08.2017 اور ریماڈر نمبری 4067

موصولہ دفتر DSP ہیڈ کوارٹر معروض خدمت ہوں کہ کمپلیٹ ہذا میں خاستہ گل ولد زیارت گل سکنہ ہزار خوانی پشاور کا کنسٹیبل تشکیل انور 24 پر -/2,80,000 روپے بطور قرض دیئے تھے اور کنسٹیبل مذکورہ رقم واپس کرنے میں ٹال مٹول کرتا ہے اس لئے پولیس لائن کے محرر کو بذریعہ پروانہ نمبری 1-6 ریڈر I-LO مورخہ 17.08.2017 کو بغرض تحریری بیان طلب کیا پروانہ بعد از تعمیل پر یہ معلوم ہوا کہ مذکورہ کنسٹیبل مد 20 مورخہ 09.08.2017 سے بدستور غیر حاضر ہے۔ مذکورہ کنسٹیبل کے طلبی کے لئے سکوتی پتہ پروانہ نمبری 615 ریڈر I-LO مورخہ 21.08.2017 تھانہ سے ارسال کیا گیا۔ بعد واپس پروانہ معلوم ہوا کہ مذکورہ کنسٹیبل بمعہ جملہ فیملی علاقہ تھانہ علاقہ تھانہ گلہار شفٹ ہوا ہے۔ مذکورہ کنسٹیبل کو طلبی کے لئے پروانہ ڈائری نمبر 628 مورخہ 24.08.2017 تھانہ گلہار ارسال کیا گیا ہے۔

لہذا پروانہ واپس پر معلوم ہوا کہ مذکورہ کنسٹیبل کے بھائی عدنان کو اطلاع دیا ہے کہ مذکورہ کنسٹیبل بغرض انکوائری دفتر حاضر ہو جائے۔ لیکن مذکورہ کنسٹیبل ابھی تک حاضر نہ آیا اور کسی قسم کا تحریری بیان بھی ارسال نہیں کیا گیا۔ مذکورہ کنسٹیبل نے موبائل نمبرات 0313-5535024، 0333-921563 پر بار بار کوشش کے باوجود نمبرات مسلسل بند آ رہے ہیں۔

آپ سے استدعا ہے کہ کنسٹیبل تشکیل انور 241 متعدد پولیس لائن سے روپوش ہے بیان دینے سے گریز کرتا ہے۔ کنسٹیبل نے خاستہ گل اور زیارت گل کو جعلی چیک دیا تھا۔ مذکورہ کنسٹیبل کے خلاف DSP لیگل سے رائے لی جائے اور کنسٹیبل مذکورہ کے خلاف قانونی کارروائی عمل میں لائی جائے۔ رپورٹ عرض ہے۔

-sd-

لائن آفیسر

ملک سعد شہید پولیس لائن پشاور۔

3862/5554
30-8-17

پولیس لائن کے پلینٹ انکوائری نمبری 3862 * بخہ 15-08-2017 اور ریماڈر نمبری 4067 موصولہ دفتر
 کیس کے تحت معروض خدمت ہوں کہ کمپلیٹ ہڈا میں ناستہ گل ولد زیارت گل سکنہ ہزارخوانی پشاور کا کنسٹیبل شکیل انور
 نے 2,80,000/- روپے بطور قرض دیئے اور کنسٹیبل مذکورہ رقم واپس کرنے میں ٹال مٹول کرتا ہے اس
 کیس پر پولیس لائن کے حرر کو بذریعہ پروانہ نمبری 1 ریڈر LO مورخہ 17-08-2017 کو بغرض تحریری بیان
 طلب کیا پروانہ بعد از تعمیل پر معلوم ہوا کہ مذکورہ کنسٹیبل مد 20 مورخہ 09-08-2017 سے بدستور غیر حاضر
 ہے۔ مذکورہ کنسٹیبل کے طلبی کے لئے بذریعہ سکوتی پتہ پروانہ نمبری 615 ریڈر LO مورخہ 21-08-2017 تھانہ
 گلہار گلہار شفت ہوا کہ مذکورہ کنسٹیبل بمعہ جملہ فیملی علاقہ تھانہ گلہار شفت ہوا ہے مذکورہ
 کنسٹیبل کے لئے تھانہ ڈائری نمبر 628 مورخہ 24-08-2017 تھانہ گلہار ارسال کیا گیا ہے۔

مذکورہ بندہ ایس پر معلوم ہوا کہ مذکورہ کنسٹیبل بھائی عدنان کو اطلاع دیا ہے کہ مذکورہ کنسٹیبل بغرض انکوائری دفتر
 سے ہٹا دیا گیا ہے۔ لیکن مذکورہ کنسٹیبل ابھی تک سر نہ آیا اور کسی قسم کا تحریری بیان بھی ارسال نہیں کیا گیا۔ مذکورہ
 بندہ موبائل نمبر 3333333333 کے باوجود نمبرات مسلسل بند آ رہا ہے۔

مذکورہ بندہ ایس کے لئے پولیس لائن بغرض بیان دینے سے گریز کرتا ہے۔ لہذا انکوائری
 ڈیویژن کارروائی ASP گلہار ارسال کیا جائے تو مزید رہوگا۔ رپورٹ عرض ہے۔

لائن آفیسر

ملک سعد شہید پولیس لائن پشاور

LO-1

DISCLAIM

PA / Dy: Supt. Police
Headquarters
Peshawar

ملک سعد شہید

BETTER COPY

جناب عالی!

بحوالہ کمپلیٹ انکوائری نمبری 3862 مورخہ 15.08.2017 اور ریما انڈر نمبری 4067

موصولہ دفتر DSP ہیڈ کوارٹر معروض خدمت ہوں کہ کمپلیٹ ہذا میں خاستہ گل ولد زیارت گل سکنہ ہزار خوانی
پشاور کا کنسٹیبل تشکیل انور 24 پر -/2,80,000 روپے بطور قرض دیئے تھے اور کنسٹیبل مذکورہ رقم واپس کرنے
میں ٹال مٹول کرتا ہے اس لئے پولیس لائن کے محرر کو بذریعہ پروانہ نمبری 1-6 ریڈر LO-I مورخہ
17.08.2017 کو بغرض تحریری بیان طلب کیا پروانہ بعد از تعمیل پر یہ معلوم ہوا کہ مذکورہ کنسٹیبل مد 20 مورخہ
09.08.2017 سے بدستور غیر حاضر ہے۔ مذکورہ کنسٹیبل کے طلبی کے لئے سکونتی پتہ پروانہ نمبری 615 ریڈر
LO-I مورخہ 21.08.2017 تھانہ سے ارسال کیا گیا۔ بعد واپس پروانہ معلوم ہوا کہ مذکورہ کنسٹیبل بمعہ
جملہ فیملی علاقہ تھانہ علاقہ تھانہ گلہار شفٹ ہوا ہے۔ مذکورہ کنسٹیبل کو طلبی کے لئے پروانہ ڈائری نمبر 628 مورخہ
24.08.2017 تھانہ گلہار ارسال کیا گیا ہے۔

لہذا پروانہ واپس پر معلوم ہوا کہ مذکورہ کنسٹیبل کے بھائی عدنان کو اطلاع دیا ہے کہ مذکورہ کنسٹیبل بغرض انکوائری
دفتر حاضر ہو جائے۔ لیکن مذکورہ کنسٹیبل ابھی تک حاضر نہ آیا اور کسی قسم کا تحریری بیان بھی ارسال نہیں کیا گیا۔
مذکورہ کنسٹیبل نے موبائل نمبرات پر بار بار کوشش کے باوجود نمبرات مسلسل بند آ رہا ہیں۔
آپ سے استدعا ہے کہ کنسٹیبل تشکیل انور 241 متعدد پولیس لائن بغرض بیان دینے سے گریز کرتا ہے۔ لہذا
انکوائری مذکورہ بغرض کارروائی ASP گلہار ارسال کیا جائے تو حاضر ہوگا۔ رپورٹ عرض ہے۔

-sd-

لائن آفیسر

ملک سعد شہید پولیس لائن پشاور۔

50	12123			
ایڈویکیٹ: فقیر محمد اسماعیل		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر: 5510-42		رابطہ نمبر: 0301808484		

بعدالت جناب: سروس گریجویٹ لیٹر محمد محمد

منجانب:	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
	بامث تحریر آگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام لیجسلیٹو کالج فقیر محمد اسماعیل کو وکیل 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 بر حلف دینے، جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 ذریعہ پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ 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 طوع و نسیہ جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المترقوم: واہ شاہ

کے لیے منظور ہے

Accepted? Accepted

Ad

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔