

27th Oct 2022

Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Adjourned as a last chance to argue the case on the next date, failing which the case will be decided on the available record without arguments on 24.11.2022 before D.B at camp court D.I.Khan. P.P given to the parties.



(Rozina Rehman)
Member(J)



(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

24.05.2022

Learned counsel for the appellant present.

He requested for adjournment in order to prepare the brief of the case. Adjourned. To come up for preliminary hearing on 27.07.2022 before S.B at Camp Court, D.I.Khan.



(Rozina Rehman)
Member (J)
Camp Court, D.I.Khan

27th September, 2022

Learned counsel for the appellant present.

Learned counsel for the appellant submits that against the impugned order of awarding minor punishment of forfeiture of two years approved service passed by the DPO, D.I.Khan on 02.06.2020, the appellant filed departmental appeal which was rejected by the Regional Police Officer on 14.10.2020. Whereafter revision petition was filed before the IGP which was dismissed vide order bearing endorsement No. 3026-31/21 dated 12.07.2021 and according to the appellant that was not communicated to him and he had applied for copy of the same was supplied on 13.09.2021. The appellant filed this appeal on 20.10.2021 which is though slightly barred by limitation. This appeal is admitted to full hearing subject to all just and legal objections by the other side regarding limitation. Mr. Kahlil, SI for the respondents present and submitted that the respondents had already prepared reply in this appeal, therefore, they accepted the notice of this appeal and since the reply has been filed, the appeal be fixed before the D.B for arguments. To come up for arguments on 27.10.2022 before D.B at camp court D.I.Khan.

Appellant Deposited
Security & Process Fee

4/10



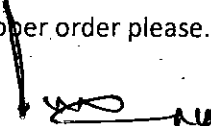


(Kalim Arshad Khan)
Chairman
Camp Court D.I.Khan

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7771/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/11/2021	<p>The appeal of Mr. Syed Asghar Ali Shah resubmitted today by Mr. Muhammad Saeed Bhutta Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to S. Bench at D.I Khan for preliminary hearing to be put there on <u>29-03-2022</u></p> <p style="text-align: center;"> CHAIRMAN</p> <p>29.03.2022</p> <p>Counsel for the appellant seeks some time to assist the court. Adjourned. To come up for preliminary hearing on 24.05.2022 before S.B at camp court, D.I.Khan.</p> <p style="text-align: center;"> CHAIRMAN, Camp Court, D.I.Khan</p>

The appeal of Mr. Syed Asghar Ali Shah S/O Baqir Ali Shah, Caste Syed, presently posted at legal branch D.I.Khan D.P.O Office L.H.C No.342, R/O P/O Madhran kalan, Village Thatal, Tehsil Paharpur and District D.I.Khan received today i.e. on 20.10.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Check list is not attached with the appeal.
2. Appeal has not been flagged/marked with annexures marks.
3. Approved file cover is not used.
4. Member copy should be attached in separate file cover.
5. Certificate be given to the effect that the appellant has not been filed any service appeal earlier on the subject matter before this Tribunal.
6. Impugned Order dated 29/05/2020, 14/10/2020 & 12/07/2021 attached with the appeal are illegible which may be replaced by legible/better one.
7. Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2095 /S.T,

Dt. 20/10 /2021


REGISTRAR,
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

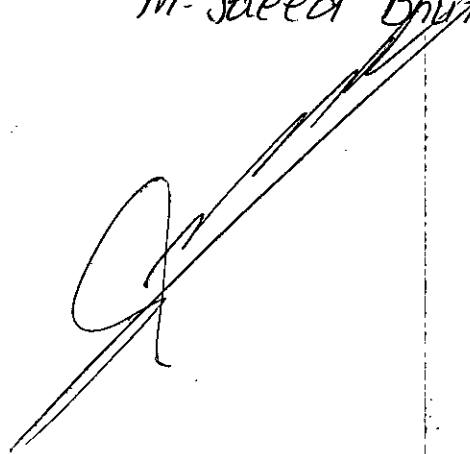
Mr. Muhammad Saeed Bhutta Adv.
High Court D.I.Khan.

Respected Sir,

with due respect, All the objections raised by your worthy office has been met out ^{fulfill}.

Date 11.11.2021

The Petitioner
Syed Asghar Ali Shah
Through Counsel
M-Saeed Bhutta



**BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST**

Case Title: Syed Asghar Ali Shah. vs DPO D. I. Khan etc.

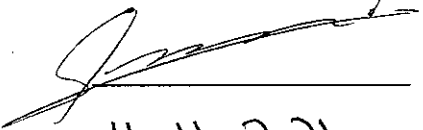
S.#	Contents	Yes	No
1.	This appeal has been presented by: <u>Counsel</u>	✓	
2.	Whether Counsel / Appellant / Respondent / Deponent have signed the requisite documents?	✓	
3.	Whether Appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent oath commissioner?	✓	
8.	Whether appeal/annexures are properly paged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?	✓	
13.	Whether copy of appeal is delivered to A.G/D.A.G?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cuttings/overwriting?	✓	
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this Court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? on _____	✓	
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? on _____		
26.	Whether copies of comments/reply/rejoinder submitted? on _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? on _____		

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

Name:

M. Saeed Bhatta, AHC.

Signature:



Dated:

11-11-2021

P= ①

**BEFORE THE SERVICE TRIBUNAL KPK
PESHAWAR**

S.T.A No 7771 of 2021.

Syed Asghar Ali Shah

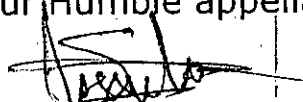
Versus

DPO D.I.Khan etc

INDEX

S #	Description of Documents	Annexure	Page #
1	Memo and Grounds for STA		1-6
2	Copy of Memo of Address		7
3	Copy of impugned order of DPO D.I.Khan	"A"	8
4	Copy of impugned order of Regional Police Officer D.I.Khan alongwith Copy of appeal	"B"	9-12
5	Copy of impugned order of Inspector General of Police of KPK Peshwar Alongwith Copy of revision petition	"C"	13-15
6	Vakalatnama		16-17

Your Humble appellant

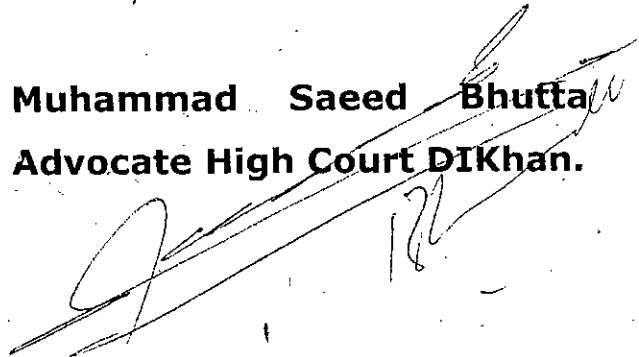


Dated: 18/10/2021

Syed Asghar Ali Shah L.H.C No.342

Through Counsel

Muhammad Saeed Bhutta
Advocate High Court DIKhan.



P=2

BEFORE THE SERVICE TRIBUNAL KPK

PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 7760

Dated 20/10/2021

S.T.A No _____ of 2021.

Syed Asghar Ali Shah S/o Baqir Ali shah Caste Syed R/o Post Office
Madhran Kalan Village Thatal Teshil Paharpur District D.I.Khan
presently posted at Legal Branch D.I.Khan D.P.O Office L.H.C No.342.
Cell No.0345-9823509

Appellant.

VERSUS

1. District Police officer DIKhan.
2. Regional Police Officer DIKhan.
3. Provincial Police Officer/Inspector General of Police KPK Peshawar.

Respondents.

Filed to-day
Registrar
20/10/21

SERVICE TRIBUNAL APPEAL AGAINST THE ORDER DATED 12/07/2021 PASSED BY THE INSPECTOR GENERAL OF POLICE KPK PESHAWAR VIDE WHICH THE REVISION PETITION FILED BY THE APPELLANT AGAINST THE ORDER PASSED BY THE REGIONAL POLICE OFFICER DIKHAN DATED 14-10-2020 WAS REJECTED WHEREAS THE ORDER OF THE DISTRICT POLICE OFFICER DIKHAN DATED 02-06 2020 WAS MAINTAINED AND UPHELD TO WHICH THE APPELLANT WAS AWARDED PENALTY OF FORFEITURE OF TWO YEARS APPROVED SERVICE ON THE GROUNDS THAT THE APPELLANT HAD NOT CHECKED THE TRUCK NO.EA/3054 LOADED WITH BURNING WOOD AT HIS CHECK POST AT CRBC DIKHAN THROUGH WHICH THE SAID TRUCK SUCCEEDED TO SMUGGLE ALMONDS FROM YOUR CHECK POST BUT WAS SEIZED AT KUNDIYAN CHECK POST DISTRICT MIANWALI (PUNJAB BRANCH)

PRAYER:-

ON ACCEPTANCE OF THE INSTANT APPEAL TO SET ASIDE THE IMPUGNED ORDERS OF THE THREE FORUMS BELOW AND TO ABSOLVE THE APPELLANT FROM PENALTY AWARDED TO HIM FOR FOFEITURE OF HIS TWO YEARS SERVICE.

RESPECTFULLY SHEWETH.

1. That the appellant was posted as LH.C. Incharge CRBC Check post at DIKhan and a truck No. EA 3054 loaded with fire wood was passed towards Punjab side but when it reached at check post Kundiyan District Miyanwali it was found that some almonds were hidden under the fire wood and were being smuggled to Punjab Province and the Incharge of Kundiyan Check post captured it and an inquiry to this effect was ordered to be conducted as the appellant has not performed his duty properly due to which the truck inquestion passed through the check post of the appellant and succeeded to reach in the limits of Punjab Province. It was negligence and the misconduct on the part of the appellant.
2. That after completion of the inquiry the appellant was found guilty and was awarded punishment for forfeiture of his two years service vide order dated 02-06-2020 passed by District Police Officer DIKhan. The copy of the order is enclosed as **Annexure A.**
3. That dissatisfied with the aforesaid order of the DPO DIKhan the appellant filed an appeal before the Regional Police Officer DIKhan but he rejected the appeal of the appellant on flimsy grounds vide his order dated 14-10-2020. The copy of the order along with grounds of appeal is enclosed **as Annexure B.**
4. That aggrieved with the orders of the two forums below the appellant filed the revision petition before the inspector General of

Police KPK Peshawar who also rejected the same vide order dated 12-07-2021. The copy of the order along with grounds of revision is enclosed as **Annexure C**.

5. That the appellant has now come in appeal before this honorable Service Tribunal for setting aside the impugned orders of the three forums below and to exonerate the appellant for the charges levelled against him on inter alia the following grounds.

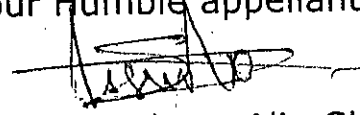
GROUND.

1. That the impugned orders of all the three forums below are against the facts, law and justice.
2. That the appellant is a senior employee of the police department DIKhan and has got more than 13 years qualifying service record at his credit and is innocent.
3. That during his long tenure of service no charge of misconduct or negligence was ever levelled against the appellant and the appellant performed his duties to the entire satisfaction of his superiors.
4. That the District Police Officer DIKhan had not afforded the opportunity of personal hearing to the appellant and has passed the impugned order arbitrarily. The inquiry officer has also not associated the appellant with the inquiry proceedings and has submitted his report arbitrarily. Thus the impugned order of the DPO DIKhan is not maintainable.
5. That the Regional Police Officer DIKhan the Inspector General of Police have also passed impugned orders very cursory manner and have not appreciated the facts reported by appellant. That the appellant have his unblemished record of the service have not been appreciated properly.

6. That the most important aspect of the case that truck in question was properly checked by the appellant at CRBC check post DIKhan and nothing sort was found therein that the truck was taking fire wood and was not equipped with smuggled goods like almonds. The said truck was travelled about 200/300 Km away freely with out any check by the appellant appellant was supposed accompany with it towards Punjab Province however at the time checking staff of Kundiyan check Post District Mianwali Punjab Province was found that the truck in question was loaded with smuggled almonds Bags hidden under the burning wood. In attending circumstances can safely gathered that the truck driver might loaded almonds in truck place situated between the limits of DIKhan and Mianwali District after passing the CRBC check post. one can over rule such. The appellant has been made scapegoat with malafide intention.

Therefore, In wake of the submissions made above it is respectfully prayed that on acceptance of this appeal the impugned orders of the three forums below may graciously be set aside and the appellant may please be absolved from the charge levelled against him to meet the end of justice.

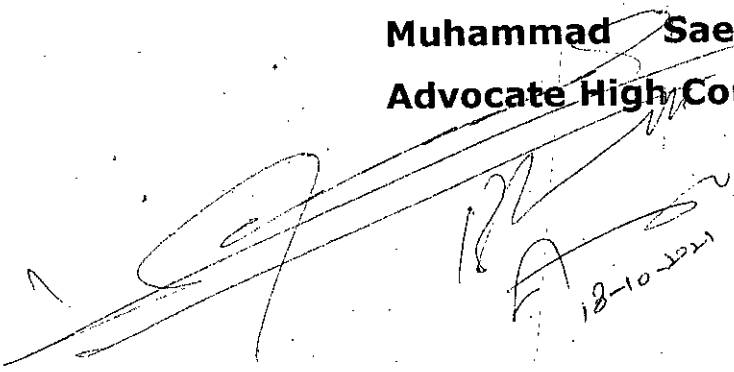
Your Humble appellant



Syed Asghar Ali Shah L.H.C
No.342

Through Counsel

Muhammad Saeed Bhutta
Advocate High Court DIKhan.

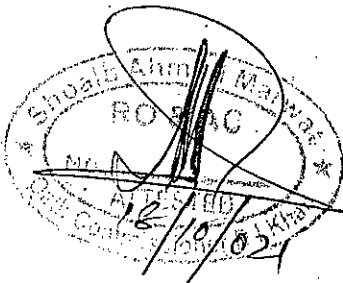


BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

S.T.A No _____ of 2021.

AFFIDAVIT

1, Syed Asghar Ali Shah S/o Baqir Ali shah Caste Syed R/o Post Office Madhran Kalan Village Thatal Teshil Paharpur District D.I.Khan presently posted at Legal Branch D.I.Khan D.P.O Office L.H.C No.342. Cell No.0345-9823509, appellant do hereby solemnly affirm & declare on oath that the contents of the accompanying appeal are true & correct to the best of my knowledge & belief & that nothing has been concealed from this Honorable Service Tribunal.



Deponent ✓

Identified by

Muhammad Saeed Bhutta

Advocate High Court DIKhan

[Handwritten Signature]
18-10-2021

Before the Service Tribunal KPK Peshawar.

Syed Asghar Ali Shah Versus DPO D.I. Khan etc.

Service Appeal

Certificate

Respected Sir,

It is stated on oath that no such appeal has been ever filed before this honourable Service Tribunal KPK Peshawar.

Date: 11-11-2021.

Appellant,

Syed Asghar Ali Shah.

ATTESTED
11-11-2021
Commissioner
D.I. Khan

P=7

**BEFORE THE SERVICE TRIBUNAL KPK
PESHAWAR**

S.T.A No _____ of 2021.

MEMO OF ADDRESS

Syed Asghar Ali Shah S/o Baqir Ali shah Caste Syed R/o Post Office
Madhran Kalan Village Thatal Teshil Paharpur District D.I.Khan
presently posted at Legal Branch D.I.Khan D.P.O Office L.H.C No.342.
Cell No.0345-9823509.

Appellant.

VERSUS

1. District Police officer DIKhan.
2. Regional Police Officer DIKhan.
3. Provincial Police Officer/Inspector General of Police KPK Peshawar.

Your humble appellant

Syed Asghar Ali Shah
Through Counsel

Muhammad Saeed Bhutta
Advocate High Court DIKhan.





OFFICE OF THE
DISTRICT POLICE OFFICER,
DERA ISMAIL KHAN

Tel: (0966) 9280062
Fax (0966) 9280293

No. 3824/EC

dt: 29/05/2020

P=8

ORDER

This order will dispose of departmental proceedings conducted against LHC Syed Asghar Ali Shah No.342 of this district Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

While he posted as Incharge at CRBC Check Post, suspicious truck bearing No.EA-3054 loaded with burning wood was passed through his Check Post on 14.04.2020, timing from 06:00 hours to 10:00 hours without any proper checking. The said truck was checked in Punjab in which almonds were hidden under the burning woods. This act on his part amounts to gross misconduct and negligence and lack of interest in official duties which is punishable under the rules.

For the above, thoughtful/professional misconduct of the accused official, charge sheet along-with statement of allegations was served upon the accused official. An enquiry was conducted into the matter through Mr. Muhammad Saleem Tariq, DSP HQrs: DI Khan, was appointed as enquiry officer to scrutinize/investigate the conduct of accused official. The Enquiry Officer submitted his finding report and recommended for Minor Punishment.

Foregoing in view of finding and recommendations of the Enquiry Officer, the undersigned came to the conclusion that the charge levelled against the accused official has been established beyond any shadow of doubt.

Therefore, in exercise of powers conferred upon me under the ibid rules I, Capt. @ Wahid Mehmood, District Police Officer, DI Khan, award him Minor Punishment of forfeiture of two years approved service.

Attested

OB 1232
DT 02-06-2020

Capt. @ WAHID MEHMOOD, PSP,
District Police Officer,
Dera Ismail Khan

- (a) Application received on 22.6.2020
- (b) Copying has completed on
- (c) Judgement sent for recording on
- (d) No objection report
- (e) LHC Syed Asghar Ali Shah
- (f) Search of
- (g) Urgent No. 342
- (h) Name of copies
- (i) Copy completed on 22.6.2020
- (j) Copy delivered on 26.6.2020
- (k) Date of

62

BETTER COPY

P=8 (A)

OFFICE OF THE
DISTRICT POLICE OFFICER
DERA ISMAIL KHAN
Tel: (0966) 9280062
Fax: (0966) 9280293

No. _____

ORDER:

This order will dispose of departmental proceedings conducted against **LHC Syed Asghar Ali Shah No.342** of this District Police, under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

While he posted as incharge at CRBC Check Post, suspicious truck bearing No.EA-3054 loaded iwht burning wood was passed through his Check Post on 14.04.2020, timing from 06:00 hours to 10:00 hours without any proper checking. The said truck was checked in Punjab in which almonds were hidden under the burning woods. This act on his part amounting to gross misconduct and negligence and lack of interest in official duties which is punishable under the rules.

For the above, thoughtful/Professional misconduct of the accused official, charge sheet along-with statement of allegations was served upon the accused official. An enquiry, was conducted into the matter through **Mr. Muhammad Saleem Tariq, DSP Hqrs:DIKHAN** was appointed as enquiry officer to scrutinize/ investigation the conduct of accused official. The Enquiry Officer submitted his finding report and recommended for Minor Punishment.

Foregoing in view of finding and recommendations of the Enquiry Officer, the undersigned came to the conclusion that the charge leveled against the accused official has been established beyond any shadow of doubt.

Therefore in exercise of powers conferred upon me under the ibid rules I, Capt. R Wahid Mehmood, District Police Officer, DI Khan, award him Minor Punishment of forfeiture of two years approved service.

Capt. R Wahid Mehmood, PSP
District Police Officer
Dera Ismail Khan

P=9

1797

No. 9195 /ES

Dated D.I. Khan

16/10/2020 16-10-20

ORDER

This order is aimed to dispose of the departmental appeal of LHC Syed Asghar Ali Shah No.342 of District Police DIKhan against the minor punishment order i.e. forfeiture of two years approved service by DPO DIKhan vide OB No. 1232 dated 02.06.2020, on the following allegations:

Facts of the case are that he while posted as 4/C at CRBC Check Post, suspicious truck bearing No. EA-3054 loaded with burning wood passed through his Check Post on 14.04.2020 timing from 06:00hrs to 10:00hrs without any proper checking. The said truck was checked in the Punjab check post kundia, District Mianwali in which almonds were found hidden under the burning woods.

He was issued charge sheet and proper departmental proceedings were initiated against him. Enquiry into the matter was conducted by Mr. Muhammad Saleem Tariq, (the then DSP HQs D.I. Khan) who submitted his findings report and recommended him for Minor Punishment. In the light of recommendations of enquiry officer, DPO D.I. Khan has passed the order dated 02.06.2020.

He preferred an appeal to the undersigned on 30.06.2020 against the order of DPO DIKhan. His appeal was sent to DPO DIKhan for comments and to provide his service record vide this office Endst: No. 2723/ES dated 06.07.2020. DPO DIKhan vide his office memo: No. 4838/EC dated 20.07.2020 has furnished the comments on the subject appeal.

The undersigned perused the enquiry file of the appellant thoroughly as well as heard him in person in Orderly Room on 23.09.2020. As per findings of the enquiry officer, the charges of misconduct stand proved against the defaulter LHC as he failed to check the truck whereas it was checked in Punjab check post and smuggled items were recovered.

Therefore, I, YASEEN FAROOQ, Regional Police Officer, Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11(A)(a) of Police Rules 1975 amended 2014, the minor punishment of two years approved service awarded by DPO D.I. Khan uphold the order of penalty and his appeal is hereby rejected.

ORDER ANNOUNCED

By Y.F.
Dt. 16-10-2020

(YASEEN FAROOQ) PSP
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN

No. 9196 /ES

Copy of above alongwith service record is sent to the DPO DIKhan with reference to his office memo: No. 4838/EC dated 20.07.2020.


EC/OH/IOB/PO
for int action

PP's attached
14/10

(YASEEN FAROOQ) PSP
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN

SPPO/DIK

CAH

Attested


Office of the
Regional Police officer
Dera Ismail Khan
14-10-2020

No. _____ Dated DI Khan the

ORDER:

This order is aimed to dispose of the departmental appeal of **LHC Syed Asghar Ali Shah No.342** of district Police DIKHAN against the minor punishment order i.e forfeiture of two years approved service by DPO DIKHAN vide OB No.1232 dated 02.06.2020, on the following allegations:

Facts of the case are that he while posted as I/C at CRBC Check Post, suspicious truck bearing No.EA-3054 loaded with burning wood passed through his check post on 14.04.2020 timing from 06:00hrs to 10:00hrs without any proper checking. The said Truck was checked in the Punjab Check post kundia, District Mianwali in which almonds were found hidden under the burning woods.

He was issued charge sheet and proper departmental proceedings were initiated against him. Enquiry into the matter was conducted by Mr. Muhammad Saleem Tariq, the then DSP HQs D.I.Khan who submitted his findings report and recommended him for Minor Punishment. In the light of recommendation of enquiry officer, DPO D.I.Khan has passed the order dated 02.06.2020.

He preferred an appeal to the undersigned on 30.06.2020 against the order of DPO DIKHAN. His appeal was sent to DPO DIKHAN for comments and to provide his service record vide this office Endst: No. 2723/Es dated 06-07-2020. DPO DIKHAN vide his office memo: No. 4828/EC dated 20.07.2020 has furnished the comments on the subject appeal.

The undersigned perused the enquiry file of the appellant thoroughly as well as heard him in person in Orderly Room on 23.09.2020. As per findings of the enquiry officer, the charges of misconduct stand proved against the defaulter LHC as he failed to check the truck whereas it was checked in Punjab check post and smuggled items were recovered.

Therefore, I, YASEEN FAROOQ, Regional Police Officer, Dera Ismail Khan, in exercise of the powers conferred upon me under Rule-11(4)(a) of Police rules 1975 amended 2014, the minor punishment of two years approved service awarded by DPO D.I.Khan uphold the order of penalty and his appeal is hereby rejected.

ORDER ANNOUNCED

(YASEEN FAROOQ)PSP
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN

No.9196/ES

Copy of above alongwith service record is sent to the DPO DIKHAN with reference to his office memo No.4838/EC dated 20.07.2020.

(YASEEN FAROOQ)PSP
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ


سروس اپیل

اپیل در بارہ بحالی 02 سالہ ضبطگی سروس

THROUGH PROPER CHANNEL

بخدمت جناب عزت مآب یسین فاروق صاحب
ڈپٹی انسپکٹر جنرل آف پولیس، ڈیرہ اسماعیل خان

Attested



بحوالہ آرڈر نمبر 3824/EC مورخہ 29.05.2020

آرڈر بک نمبر 1232 مورخہ 02.06.2020

مجاہد جناب ڈسٹرکٹ پولیس آفیسر صاحب، ڈیرہ اسماعیل خان

LHC سید اصغر علی شاہ نمبر 342

متعینہ حال تھانہ پروا، ضلع ڈیرہ اسماعیل خان

موبائل نمبر 03459823509

جناب عالی!

سائل حسب ذیل عرض رساں ہے۔

1. یہ کہ سائل مورخہ 27.07.2007 کو محکمہ پولیس میں بطور کسٹمیل بھرتی ہوا اور سال 2014 میں لوڈ کورس پاس کر کے اپنی ڈیوٹی بطور LHC نہایت ہی جانفشانی اور دیانتداری سے انجام دے رہا ہوں۔ اور ضلع ہذا کے اکثر تھانہ جات پر بطور IDFC اپنی خدمات سرانجام دی ہیں۔

جو سائل کی انفارمیشن پر کافی تعداد میں اسلحہ و منشیات برآمد ہوئی۔ جو سائل کی خدمات روز روشن کی طرح عیاں ہیں۔

2. یہ کہ من سائل پر الزام ہے کہ من سائل کی موجودگی میں لکڑیوں سے بھرا ٹرک نمبر EA-3054 بغیر کسی چیکنگ کے گزر کر چلا گیا۔ جس پر جناب DPO صاحب نے من سائل کو بحوالہ آرڈر بک نمبر 1232 مورخہ 02.06.2020 کو سزا کے طور پر سائل کی دو سائل سروں ضبط کرنے کا حکم جاری کر دیا۔ جو کہ انصاف کے تقاضوں کے منافی اور زیادتی ہے۔

3. یہ کہ من سائل نے اپنی 13 سالہ سروں اور بطور IDFC اپنی ڈیوٹی نہایت ہی جانفشانی اور ایمانداری سے انجام دی ہے اور افسران بالا کی طرف سے ہمیشہ شباشی و انعام و کرام سے نوازا گیا ہوں۔ اور کبھی بھی افسران بالا کو شکایت کا موقع فراہم نہیں کیا ہے۔

جہاں تک متذکرہ ٹرک کا تعلق ہے تو روزانہ کی بنیاد پر ٹرانک روڈ پر کافی تعداد میں ٹرک گزرتے ہیں جن کو بغیر انفارمیشن کے روک رکھنا کسی بڑے نقصان کا اندیشہ ہو سکتا ہے اسی طرح چیک پوسٹ کے ملحقہ محکمہ جنگلات کی چیک پوسٹ ہے جو باقاعدہ چیکنگ اور کلیئرنس کے بعد ٹرک کو گزرا جاتا ہے جس پر متعلقہ محکمہ جنگلات کی مہر بھی لگی ہوتی ہے۔

Attested

عالیجا!

سائل پر گائے گئے الزامات سراسر بے بنیاد ہیں جن میں کوئی صداقت نہیں ہے اور نہ ہی سائل کی کسی قسم کی کوئی بدینتی شامل نہیں ہے۔ سائل نے اپنی 13 سال سروں میں اپنی ڈیوٹی پولیس نہایت ایمانداری اور جانفشانی سے انجام دی ہے اور کبھی بھی افسران بالا کو شکایت کا موقع فراہم نہیں کیا ہے۔ جو سائل کی خدمات روز روشن کی طرح عیاں ہیں۔

استدعا

لہذا بذریعہ درخواست استدعا ہے کہ سائل کے سابقہ خدمات پولیس اور مدت ملازمت کو مد نظر رکھتے ہوئے سائل کی سزا معاف فرماتے ہوئے 02 سروس بحال فرمائی جائے۔ سائل تازہ دست دغا گور ہے گا۔

العارضے

Attested

LHC سید اصغر علی شاہ نمبر 342
متعینہ حال تھانہ پروا، ضلع ڈیرہ اسماعیل خان
موبائل نمبر 03459823509

ASW



1286
28/07/21
2584
26/7/21
No. SI

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

12-c7-2021
107/2021

21, dated Peshawar the 10/7/2021.

ORDER

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by LHC Asghar Ali Shah No. 342. The petitioner was awarded penalty of forfeiture of two years approved service by District Police Officer, D.I.Khan vide OB No. 1232, dated 02.06.2020 on the allegations that he while posted at I/C CRBC Check Post suspicious truck bearing No. EA-3054 loaded with burning wood passed through his check post on 14.04.2020 timing from 06:00 hrs to 10:00 hrs without any proper checking. The said truck was checked in the Punjab check post Kundian District Mianwali in which almonds were found hidden under the burning woods. His appeal was rejected by Regional Police Officer, D.I.Khan vide order No. 9195-9196/ES, dated 14.10.2020.

Meeting of Appellate Board was held on 22.06.2021 wherein petitioner was heard in person. Petitioner denied the allegations leveled against him.

Perusal of enquiry papers reveals that the allegations leveled against the petitioner have been proved as he failed to check the truck whereas it was checked in Punjab check post and smuggled items were recovered. The Board see no ground and reasons for acceptance of his petition, therefore, the Board decided that his petition is hereby rejected.

Sd/-
KASHIF ALAM, PSP
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

Appended

No. SI 3026-31 21.

Copy of the above is forwarded to the:

1. Regional Police Officer, D.I.Khan. One Service Roll, one Fauji Missal alongwith copy of complete enquiry file of the above named LHC received vide your office Memo: No. 782/ES, dated 23.02.2021 and No. 2083/ES, dated 28.05.2021 respectively is returned herewith for your office record.
2. District Police Officer, D.I.Khan.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
5. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

EC/OB/SHC
12/7

(IRFAN ULLAH KHAN) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
27/07/21

No. 3164 LIES
And 27/7/21

D.P.O. D.I.Khan

Please inform the
petitioner accordingly.
Moreover one Service & one
Fauji missal alongwith complete enquiry
file are also returned herewith for
your office record.

OB 1283

DT 30-07-2021

REGIONAL POLICE OFFICER
D.I. KHAN

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUN KHUWA
PESHAWAR

No. S/ _____/21, dated Peshawar the _____ 2021

ORDER

This order hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by **LHC Asghar Ali Shah** No. 342. The petitioner was awarded penalty of forfeiture of two years approved service by District Police Officer, D.I.Khan vide OB No. 1232, dated 02.06.2020 on the allegations that he while posted at I/C CRBC Check Post, suspicious truck bearing No. EA-3054 loaded with burning wood passed through his check post on 14.04.2020 timing from 6:00 hrs to 10:00 hrs without any proper checking. The said truck was checked in the Punjab check post Kundian District Mianwali in which almonds were found hidden under the burning woods. His appeal was rejected by Regional Police Officer, D.I.Khan vide order No.9195-9196/ES, dated 14.10.2020.

Meeting of Appellate Board was held on 22.06.2021 wherein petitioner was heard in person. Petitioner denied the allegations leveled against him.

Perusal of enquiry papers reveals that the allegations leveled against the petitioner have been proved as he failed to check the truck whereas it was checked in Punjab check post and smuggled items were recovered. The Board see no ground and reasons for acceptance of his petition, therefore, the Board decided that his petition is hereby rejected.

Sd/-

KASHIF ALAM, PSP

Additional Inspector General of Police,
HQrs: Khyber PakhtunKhuwa, Peshawar.

No.S/ _____/21,

Copy of the above is forwarded to the:

1. Regional Police Officer, D.I.Khan, One service Roll, one Fauji Missal alongwith copy of complete enquiry file of the above named LHC received vide your office Memo: No. 782/ES, dated 23.02.2021 and No, 2083/ES, dated 28.05.2021 respectively is returned herewith for your office record.
2. District Police Officer, D.I.Khan.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
5. PA to Addl: IGP/HQrs: Kyber Pakhtunkhwa, Peshawar.
6. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

(IRFAN ULLAH KHAN) PSP

AIG/Establishment,
For Inspector General of Police,
Khyber PakhtunKhuwa, Peshawar.

P=

To:

Worthy Provincial Police Officer/ Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

Through:

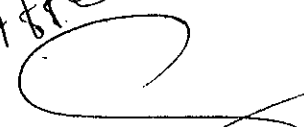
Proper Channel.

Subject:

Revision Petition Under Rule 11-A of Police Rules-1975 Against Order Of DPO,
D.I.Khan Passed over Ob No.1232 dated 2.6.2020 and Consequential Appellate
Order of RPO/DIG, D.I.Khan, Passed Over No.2221 Dated 16.10.2020.

Reverend Sir,

Respectfully, the petitioner states as under,

Attested


1. That the petitioner was enrolled as Constable in the Police Department at district of Dera Ismail Khan and earned promotion to the rank of Lance Head Constable, earning good will and praise from his superiors for his hard work and devotion. The petitioner has about 15 years of unblemished service and has always served the department with due diligence, dedication and to the utter satisfaction of his superiors. Service record of the petitioner is second to none and no adverse inference was ever drawn by the superiors since nothing of the sort was ever conveyed to the petitioner.
2. That the petitioner always has striven hard to discharge and fulfill the duties and tasks assigned to him with due diligence and dedication. Service record of the appellant is clean and devoid of any adverse marking.
3. That during April-2020 the petitioner was subjected to departmental action on the allegation of misconduct & negligence in discharge of official duties.
4. That the matter was assigned for inquiry to DSP/Hqs, D.I.Khan who while pushing the proceedings in a slipshod manner, conveyed complicity on part of the petitioner in his inquiry report yet without any lawful, justifiable and sustainable basis or foundation or evidence brought on records in any manner yet recommended award of minor punishment to the petitioner.
5. That the petitioner was in no manner involved in any misconduct but was condemned for an apparent misconceived opinion drawn on the basis of an erroneous inquiry report.
6. That the matter having been put-up for consideration to the authority i.e DPO, D.I.Khan culminated in award of punishment to the petitioner of the kind "Forfeiture of 2 years of approved service" after a cursory proceedings yet neither held nor processed in accordance with the provisions of the relevant rules.
7. That on coming to know of the impugned order a departmental appeal was preferred with the office of RPO/DIG, D.I.Khan which also failed vide order dated 16.10.2020 yet without proper appraisal of facts and law / rules on the subject. Copies of impugned orders are placed herewith at Annexes-A & B, respectively.
8. That aggrieved from the orders of DPO & RPO/ DIG, D.I.Khan and left with no other remedy, the petitioner approaches your kind office seeking revision of the impugned orders on gracious acceptance of the instant petition on grounds hereinafter preferred.

Grounds:

1. That the order passed by DPO, D.I.Khan and consequential order of departmental appellate authority i.e RPO/ DIG, D.I.Khan, as impugned hereby, are discriminatory, arbitrary in nature, legally and factually incorrect, ultra-vires, void-ab-initio and militate against the principles of natural justice thus are liable to be set-aside and nullified.
2. That the petitioner is innocent and has been subjected to the penalty for no fault on his part.
3. That the petitioner has sufficient length of service rendered for the department. While adjudicating in the matter the authorities below utterly ignored not only the provisions of law on the point but the rights, too, of the petitioner.
4. That the punishing as well departmental appellate authorities utterly failed to follow due procedures hence erred in disposal of the matter in accordance with the law and rules. The impugned orders passed by DPO, D.I.Khan & consequential order of RPO/DIG, D.I.Khan thus lack in legal sanction and therefore, are liable to be set-aside in the interest of justice.
5. That the petitioner has been virtually condemned unheard and never was afforded with an opportunity to defend himself beyond encumbrance hence the entire proceedings were nothing less than grave miscarriage of justice.
6. That your good office has ample powers to adjudge the matter under reference in the interest of justice and equity.

Attested

Prayer:

In view of the fore mentioned submissions, it is very humbly requested that the impugned orders dated 02.06.2020 passed by DPO, D.I.Khan and consequential order of RPO / DIG, D.I.Khan dated 16.10.2020 may be very graciously set-aside and the forfeited service of the petitioner may in consequence thereof be very kindly restored with grant of back benefits in the interest of justice.

Dated:

Humble Petitioner,

(Signature)

(Syed Asghar Ali Shah) Petitioner,
Lance Head Constable No.342,
Police Station Cantt;
District Dera Ismail Khan.

03459823509



GHULAM SAEED

Advocate
bc-10-4838
Date of Issue: March 2019
Valid upto: March 2022



Secretary
KP Bar Council

وکالت نامہ

وقت ایک روپیہ	کورٹ فیس
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بعدالت جناب سی ویس بی بی بیٹونا بساوند حسین خٹو بخارا

منجانب

سید صفی علی شاہ بیام DPO پٹوہ وٹوہ

دعویٰ یا جرم

سروس اینٹل

تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہات ہی برائے ہمیشی یا تصفیہ مقدمہ بمقام سرورہ اسکاٹل کھیلے
محمد سعید کھوڑا اور وکیل صاحبان

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر قسمی پر خود بذریعہ اختیار خاص رو برو عدالت حاضر ہونا ہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر ہمیشی پر منظر حاضر نہ ہوں اور مقدمہ ہمیشی غیر حاضر کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف مندرجہ مقام پٹوہ کی عطاہ کی جگہ یا پٹوہ کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف مندرجہ مقام پٹوہ کی عطاہ کی جگہ یا پٹوہ کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ مندرجہ مقام پٹوہ کی عطاہ اور جگہ سمیت ہونے یا بروز تعطیل یا پٹوہ کے اوقات سے آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا نمائندہ رہا پس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخل صاحب موصوف مل کر وہ ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو ہمیشی دعویٰ یا جرم دعویٰ اور درخواست اجراءے ذکر کی و نظر ثانی اپیل گرانال و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ذمہ داری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر غائبی یا راضی نامہ و فیصلہ بر حلف کرنے، اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیش مقدمہ مذکورہ بیرون از کچھ ہی مندرجہ بیرونی مقدمہ مذکورہ نظر ثانی و اپیل گرانال و برآمدگی مقدمہ یا منسوخی ذکر کی بنا پر درخواست حکم استعفی یا ترقی یا کرٹاری گن از فیصلہ اجراءے ذکر کی بھی صاحب موصوف کو بشرط اذیل پیش مقدمہ بیرونی کا اختیار ہوگا اور تمام ساختہ پر داخل صاحب موصوف مل کر وہ ذات خود منظور و قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل یا گرانال یا دیگر معاملہ مقدمہ مذکورہ کی دوسرے وکیل یا ہیر سز کو اپنے بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے شیر تالون کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور وہ ان مقدمہ میں جو جگہ ہر حال نہ اتنا کوڑا ہوگا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری فیس تاریخ ہمیشی سے پہلے ادا نہ کروں گا۔ تو صاحب موصوف کو یہ اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں ہر کوئی مطالبہ کسی حکم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورہ 18 مارچ 2019ء

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد محمد سعید کھوڑا
 العبد سید صفی علی شاہ بیام
 العبد محمد سعید کھوڑا

Accepted

ایسٹاٹ



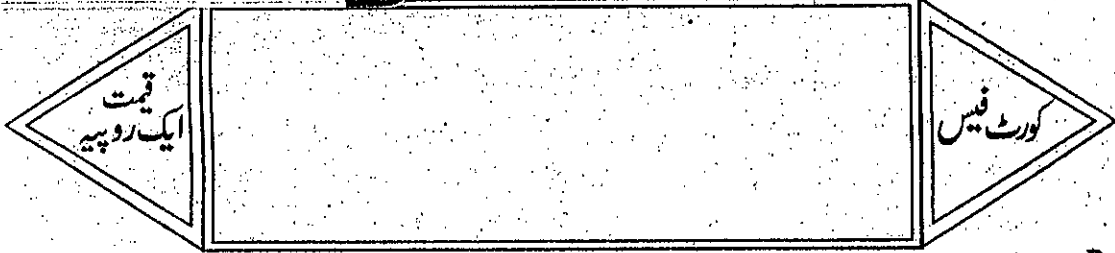
SHOAI AHMAD KHAN

Advocate
bc-14-5125
Date of Issue: February 2019
Valid upto: February 2022



Secretary
KP Bar Council

وکالت نامہ



بعدالت جناب سروس ٹریبونل پشاور جسٹس محنتخواہ

منجانب سید اصغر علی شاہ

بنام D.P.O ڈی پو وغیرہ

دعویٰ یا جرم

تفصیل دعویٰ یا جرم سروس ایمل

باعث تخریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام ڈی پو کے عمل کیلئے

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام ڈی پو کے عمل کیلئے
کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ میں ہر پیشی پر خود بذریعہ اختیار خاص رو برو عدالت حاضر ہونا ہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب
موصوف کو اطلاع دیکر حاضر عدالت کروں گا، اگر پیشی پر منظر حاضر نہ ہوں۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا تو صاحب موصوف
اسکے کسی طرح ذمہ دار نہ ہوں گے، نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے
ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام بکھری کے علاوہ کسی جگہ یا بکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیروی کرنے کے ذمہ دار نہ
ہوں گے۔ اور مقدمہ صدر بکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا بکھری کے اوقات کے آگے پیچھے پیش ہونے پر منظر کو کوئی نقصان پہنچے تو اس کے ذمہ
دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عائد واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف مل کر وہ
ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو مرضی دعویٰ، یا جواب دعویٰ یا درخواست اجراء کے ذمہ نظر ثانی اپیل گھرائی و ہرجم درخواست پر دخل و تعددین کرنے کا
بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہرجم کاروبہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہرجم کے بیان دینے اور اس پر حاشی یا راضی نامہ و فیصلہ پر
حلف کرنے، و اقبال دعویٰ کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ بیرون از بکھری صدر بیروی مقدمہ مذکورہ نظر ثانی و اپیل و گھرائی و ہرجم کی
مقدمہ یا منوشی ڈگری یکطرف یا درخواست غم انتہائی یا قرتی یا گرفتاری عمل اور فیصلہ اجراء کے ذمہ بھی صاحب موصوف کو بشرط ادا تکلیف عائد نہ بیروی کا اختیار ہوگا
اور تمام ساختہ پر داخلہ صاحب موصوف مل کر وہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اسکے کسی جزو
کی کاروائی یا بصورت درخواست نظر ثانی اپیل یا گھرائی یا دیگر معاملہ مقدمہ مذکورہ کسی دوسرے وکیل یا ہرجم کرنا ہے۔ بجائے یا اپنے ہمراہ مقرر کریں۔ اور ایسے شیرکانوں کو
بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں، اور دوران مقدمہ میں جو کچھ ہر جائد التواء پڑے گا، وہ صاحب
موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری ٹیس تاریخ پیشی سے پہلے اذان کروں گا۔ تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیروی نہ کریں اور ایسی
صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

موزع 18 مارچ 2021

مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

Accepted

18/10/21

سید اصغر علی شاہ ولد سید باقصر علی شاہ قوم سید
کنندہ ایجنٹ مندرجہ کلڈن تحصیل مہار پور ضلع ڈی پو عمل خان
ابلاص

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No.

TB DMC

APPEAL No. 7771 7772 of 2021

Syed Asghar Ali Shah, Ihsanullah

Appellant/Petitioner

Versus

DPO D/Kh

RESPONDENT(S)

Recd No 2
Notice to ~~Appellant/Petitioner~~ Regional Police Officer
D/Kh

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 27-10-22 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp court
D/Kh

along with another
connected appeal is
also attached.
For Argument

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

2020
No

TB DIC

APPEAL No. *7771* ~~7772~~ of 20 *22*

AE Syed Asghar Ali Shah Othor

Appellant/Petitioner

Versus

DPO Dikha

RESPONDENT(S)

RESP NO I

Notice to Appellant/Petitioner

DIST Police officer

DICU

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *27-10-22* at *9:00 AM*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

*at camp court
DICU-*

*along with another
connected appeal is
also attached.
for Argument*

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

[Handwritten mark]

TB DIC

No.

APPEAL No. 7771 7772 of 20 21

Syed Asghar Ali Shah

Appellant/Petitioner

Versus

DPO DICK

RESPONDENT(S)

Resp No 3

Notice to Appellant/Petitioner

Provincial Police officer

IGP Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 27-10-22 at 9.00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

@ camp court

DICK

For Argument

[Handwritten signature]

[Handwritten signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

14/10/22