

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

C.M No. _____/2023
Appeal No. 1305 /2023

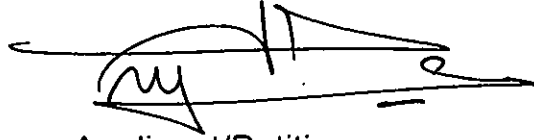
Abdul Wahid.....Applicant/Petitioner

V E R S U S

IGP & others.....Respondents

I N D E X

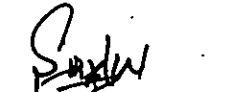
S#	Description of Documents	Annex	Pages
1.	Application		1-2
2.	Copy of letter No.CPO/CPB 208 dated 12.06.2023	A	
3.	Copy of Annual confidential report	B	
4.	Wakalatnama		



Applicant/Petitioner

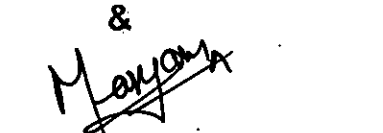
Through

Shakir Uddin Shahid
Cell No.0345-8698850



Suraj Waheed

&



Maryam Qaiser
Advocates
High Court, Peshawar

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BEFOR THE LERNED SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR

C.M In-----/2023

In

Service Appeal No 1305/2023



Abdul wahid

VERSUS

Inspector General of Police and others

APPLICATION FOR PLACING ON FILE LETTER NO CPO/CPB.208 DATED 12 JUNE 2023 AND ANNUAL CONFIDENTIAL REPORT (ACR) OF THE APPELLANT FOR THE KIND PERUSAL OF THIS HONORABL REPORT.

Respectfullay Sheweth:

1. That the above title case is pending before this Honorable Court which is fixed for 07-08-2023.
2. That the Inspector General of Police Khyber Pakhtunkhwa Peshawar issued the above mentioned letter to the District Police Officer District lower chitral, it is stated that the appellant was deferred from promotion in the DSC meeting on 08-12-2022 due to incomplete ACR for the year of 2019 later on retired.9Copy of letter no CPO/CPB 208 dated 12 june 2023 is annexed as annexure "A")
3. That Inspector General of police khyber Pakhtunkhwa has been directed to Regional Police Officer Malakand Region to inform the appellant about the above mentioned fact.
4. That annual confidential report for the year of 2019 of the appellant is complete and is submitted in the concerned office of ACR branch in all respect, and due to misunderstanding regarding the Annual

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Confidential Report of the appellant, the appellant was not promoted as per rules. (Copy of Annual Confidential Report is annexed as annexure "B")

5. That the sole ground on which appellant was deferred on promotion has been mentioned is the complete Annual Confidential Report while other colleagues of the appellant including his juniors have been promoted after retirement.
6. That the appellant to place on file the above mentioned documents which are necessary and essential for the disposal of the above title appeal.

It is therefore humbly prayed that on acceptance of this application the applicant/appellant may kindly be allowed to place on file the documents mentioned above.

Applicant/ appellant

Through

Shakir Uddin Shahid

Advocate High Court

AFFIDAVIT.

I solemnly affirmed on oath and declare 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 Hon'ble Court.

DEPONENT

ATTESTED

25/7/23

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OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.

CPO/CPB/ 208

Dated

Peshawar 12 June, 2023.

To: The Regional Police Officer,
Malakand Region.

Subject: APPLICATION FOR FINANCIAL/FISCAL BENEFIT BY PROMOTION OF
RETIRED INSPECTOR MR. ABDUL WAHID NO. 465/M OF DISTRICT
LOWER CHITRAL

Memo:-

I am directed to refer to your office letter No. 5635-36/11, dated 10.04.2023 on the subject cited above and to state that application of Retired Inspector Abdul Wahid has been filed by the Competent Authority because he was deferred from promotion in the DSC meeting on 08.12.2022 due to incomplete ACR for the year 2019 and later on retired.

It is, therefore, requested that the applicant may be informed accordingly.

Afsar Jan
12/6/23

(AFSAR JAN)
Registrar,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

~~ATTESTED~~
A
26/7/2021

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Police No. 99

No. 13-17

POLICE DEPARTMENT

DISTRICT DIR UPPER

Annual Confidential Report on the working of Inspector, Sub Inspector and Assistant Sub Inspector for the year ending December, 2019.

Name Provincial or Rang & Grade	INSPECTOR ABDUL WAHID NO.M/465
Father Name	Muhammad Rubim
Where and on what duties employed during The past 12 months.	From: 01.01.2019 to 31.12.2019 SDO PS Kalkot
Class of Superintendent of Police's report i.e "A" or "B"	A
Is he honest	Yes
Remarks by:- 1) Superintendent of Police.	<p>An efficient and loyal police officer. He knows his job very well.</p> <p><i>[Signature]</i> IMAN NASIB JAN District Police Officer, Dir Upper. Period from 01.01.2019 to 31.12.2019.</p>
<i>[Signature]</i> (Sd/-) (M. Saeed) PSP Regional Deputy Inspector General of Police, Malakand	
	<p>ATTESTED</p> <p><i>[Signature]</i> 25/12/2019</p>

بعد الت

سروس ٹریبونل جید و مختار ہوگا۔

عبدالرحمن صاحب
عبدالرحمن صاحب
عبدالرحمن صاحب

موزتہ
مقدمہ
دعوی
جرم

باعث تحریر آنکے

عبدالرحمن صاحب
عبدالرحمن صاحب
عبدالرحمن صاحب

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دیکل کاروائی متعلقہ
آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار و نفاذ
دیکل صاحب کو راضی نامہ کرنے و تقررات ہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہونگا۔ نیز صورت عدم پیروی یا ڈگری کیلئے یا اپیل کی برآمدگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مختار شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پر داخیز منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تازین پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا کالت نامہ لکھد یا کہ سندر ہے۔

عبدالرحمن صاحب
عبدالرحمن صاحب
عبدالرحمن صاحب

الرقوم 25 ماہ 07 2023

مقام کے لئے منظور ہے۔

Accepted
Ishaq photocopy (HCP)

Accepted

Accepted