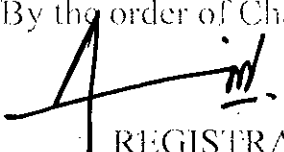


FORM OF ORDER SHEET

Court of _____

Appeal No. 2204/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/10/2023	<p>The appeal of Mr. Sabir Hussain received today through special messenger. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ counsel for the appellant be informed accordingly.</p> <p>By the order of Chairman  REGISTRAR</p>

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR, CAMP DIKHAN,

In Service Appeal No. 2204 /2023

Sabir Hussain
(Appellant)

Versus

Govt; of KPK etc
(Respondents)

INDEX

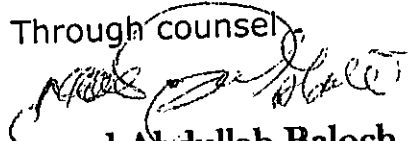
S.No.	Description of documents	Annexure	Pages
1.	Memorandum of Appeal and affidavit	--	1-5
2.	Copies of charge sheet, statement of allegations and letter No. 3711/ES dated 27/05/2023	A	6-8
3.	Copy of RPO order No. 3709/ES dated 27/05/2023	B	9-9
4.	Copy of written reply	C	10-11
5.	Copy of impugn order dated 22/06/2023	D	12-12
6.	Copy of departmental appeal	E	13-16
7.	Vakalatnama	--	17-17

Dated: ___/10/2023

Your humble appellant


Sabir Hussain

Through counsel


Muhammad Abdullah Baloch
Advocate Supreme Court

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

SERVICE APPEAL No. 2204 /2023

Sabir Hussain No. D/51, Sub-inspector presently posted as SHO/MKh District police Bannu.

Appellant

VERSUES

1. The Inspector General of Police, Central Police Office, IGP, Peshawar.
2. The Addl: Inspector General of Police, Head Quarters, CPO, Peshawar.
3. Regional Police Officer, DIKhan Range Dera Ismail Khan.
4. District Police Officer Dera Ismail Khan.

Respondents

**SERVICE APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED ORDER NO. 4497-99/ES DATED 22/06/2023 WHEREBY
THE APPELLANT HAS BEEN AWARDED "MAJOR PUNISHMENT OF REDUCTION
IN RANK FROM INSPECTOR TO SUB-INSPECTOR WITH IMMEDIATE EFFECT"
AND SERVICE APPEAL AGAINST INDISICION OF THE DEPARTMENTAL APPEAL
OF THE APPELANT.**

Note: That the addresses of the Parties given in the heading of the Petition are true and correct for the purpose of service.

Respected Sir;

1. That the appellant is serving as Sub-inspector in district Police DIKhan and is currently posted as SHO/MKh District police Bannu.
2. That the appellant was appointed as Assistant Sub Inspector in KPK Police Department on the recommendation of KPK Public Service Commission on 17/03/2010. The appellant was promoted as Inspector on 16/04/2020.
3. That during the entire service record the appellant have served in Kohat range, Charsada range, Bannu range, in CTD and as SHO in multiple police stations and even served at extremely hard areas. Due to the meritorious services of the appellant has been awarded reward of CC-1 with cash by the PPO, several times and similarly has been awarded multiple certificates and award from the department.

directions to the Incharge Khutti check post namely Riaz Hussain IHC. The official communication which is regarded as internal secret communication, was mistakenly or intentionally shared in social media by the said IHC Riaz Hussain. The Worthy RPO DIKhan region issued charge sheet and statement of allegations vide letter No. 3711/ES dated 27/05/2023. Copies are annexed as Annexure A. The appellant was also suspended vide RPO order No. 3709/ES dated 27/05/2023. Copy is annexed as Annexure B. The appellant duly submitted his written reply. Copy of reply of the appellant is annexed as Annexure C. During the inquiry proceeding, the inquiry officer held the present appellant also responsible for that and RPO DIKhan issued impugned Order No.4497/ES dated 22/06/2023 and awarded major punishment of reduction in rank from inspector to Sub-inspector with immediate effect. Copy of Impugn order dated 22/06/2023 is annexed as "Annexure-D".

5. That after the issuance of impugned order, the appellant preferred a departmental appeal/representation on 26/06/2023. Copy of a departmental appeal is annexed as "Annexure-E".
6. That uptill now no response has been shown from the respondents and after the laps of statutory limitation of departmental appeal, cause of action has been accrued to the appellant for instant appeal hence, the instant service appeal, inter alia on the following grounds.

GROUNDS

1. That the impugn order is against Law and facts and against service rules, void and is in sheer violation of Police rules, 1975 amended 2014.
2. That charge sheet and statement of allegation are patently illegal, void ab-initio, unwarranted and legally not sustainable in the eye of law. The same were issued by respondent No. 3 (RPO DIKhan region), who was not a competent authority under KP Police rules, 1975 amended 2014, thus the impugn order is liable to be set aside on this score alone.
3. That as the record reflects that respondent No. 03's grievances were involved in the present inquiry. Therefore the element of anger and partiality could not be ruled out in the present case. Thus in the present eventuality respondent No. 03 was not justified to issue the impugn order.
4. That the appellant was not treated in accordance with law and the actions of the respondents are mala-fide being discriminatory and harsh. That appellant has been made scape goat in the instant inquiry proceeding and in the case.

M. A. Khan

5. That the Appellant has been subjected to injustice and the case of Appellant has not been dealt with under the principle of the fair play.
6. That statement of allegation contains the allegation of making viral a conversation on social media. The same allegations were also issued to those police officials who either, mistakenly or intentionally made the video viral. Thus the present appellant had no role with/in this allegation. But the Learned Inquiry officer held the present appellant responsible even for this allegation.
7. That the impugned order is against the settled laws and rules of KP Police Rules. Hence, ineffective upon the rights of appellant. The learned inquiry officer did not follow the prescribe procedure and failed to distinguish the case of appellant with rest of the delinquent police officials.
8. That this Hon'ble Tribunal is competent and has ample powers to adjudge the matter under Appeal.
9. That the counsel for Appellant may be allowed to argue additional grounds at the time of arguments.

It is, therefore, respectfully prayed that on acceptance of this appeal, the impugned order No. 4497-99/ES dated 22/06/2023 whereby the appellant has been awarded "major punishment of reduction in rank from Inspector to Sub-Inspector with immediate effect", being void, illegal may please be set aside and appellant may kindly be restored to his actual post/position as Inspector along with all back benefits.

Any other relief deems fit and appropriate in given circumstances may also be granted in larger interest of justice.

Yours Humble Appellant



(Sabir Hussain)
Through Counsel

Dated: /10/2023

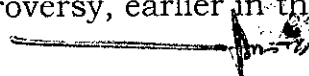


Mohammad Abdullah Baloch
(Advocate Supreme Court)

VERIFICATION

Verified on oath at DIKhan, this th day of October, 2023, that all contents of the above appeal are true and correct and appellant have not filed an appeal regarding the subject controversy, earlier in this august Tribunal.

Dated; /10/2023



Appellant

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR, CAMP DIKHAN.

In Service Appeal No. _____/2023

Sabir Hussain
(Appellant)

Versus

Govt; of KPK etc
(Respondents)

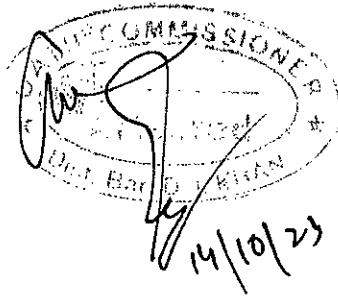
SERVICE APPEAL

AFFIDAVIT

I, **Sabir Hussain**, appellant herein, do hereby solemnly affirm on oath that all parawise contents of the accompanying appeal are true and correct to the best of my knowledge, belief and information; that nothing has been concealed or kept secret from this worthy Tribunal.

Dated /10/2023

Deponent



Annex: "A"

6



OFFICE OF THE
REGIONAL POLICE OFFICER,
DERA ISMAIL KHAN REGION

0966-9280291 Fax # 9280290
ppp@pdikhan@kppolice.gov.pk

No. 3711 /ES


dated DI Khan the

27-05/2023

To: The District Police Officer,
DI Khan.

Subject: DISCIPLINARY ACTION

Enclosed please find herewith Charge Sheet and Statement of Allegations in respect of Mr. Sabir Hussain, Inspector acting SDPO Saddar, DI Khan with the direction to conduct proper departmental inquiry for the misconduct contained in charge sheet/statement of allegations against him and report within **three days** positivity.


(ABDUL GHAFOOR AFRIDI)
PSP
Regional Police Officer,
Dera Ismail Khan Region

Received Today

30/5/2023 at 14:37

Attested copy to be true

8
7

CHARGE SHEET

I, **ABDUL GHAFUOR AFRIDI**, PSP, Regional Police Officer, Dera Ismail Khan, as competent authority, under Rule 6 of Police Rules 1975 amended 2014 hereby charge you **Inspector Sabir Hussain No. D/51 (acting SDPO Saddar, DI Khan)** as follow:-

1. Being involved in getting illegal gratification and smuggling of NCP Vehicles/Articles/Food commodities. Besides this also viral a conversation on Social Media in which you have to used rank/designation of Senior Officers with I/C of the Check Post Khutti in the jurisdiction of PS Dera Town DI Khan as safeguard for your such illicit activities.

2. These acts of your omissions and commissions constitute the offence of misconduct as defined under rule 5 clause 1 of the Police Rules 1975 (amended vide Notification No: 3859/Legal, dated 27/08/2014).

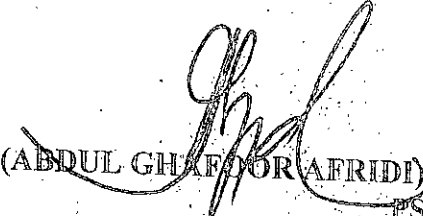
By reasons of the above, you appeared to be guilty of misconduct under Rule 5 of Police Rules 1975 amended 2014 and have rendered your-self liable to all or any of the penalties specified in the Rules ibid.

You are, therefore, required to submit your written defence within seven days of the receipt of this Charge Sheet to the Enquiry Officer as the case may be.

Your written defence, if any, should reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person.

A Statement of allegation is enclosed.


(**ABDUL GHAFUOR AFRIDI**)
PSP
Regional Police Officer,
Dera Ismail Khan Region

DISCIPLINARY ACTION

I, ABDUL GHATFOR AFRIDI, PSP, Regional Police Officer, Dera Ismail Khan, am of the opinion that Inspector Sabir Hussain No. D/51 (acting SDPO Saddar, DI Khan) has rendered himself liable to be proceeded against departmentally, as he has committed the following acts/ omissions within the meaning of Rule 5 of Police Rules 1975 amended 2014.

STATEMENT OF ALLEGATION

1. Being involved in getting illegal gratification and smuggling of NCP Vehicles/Articles/Food commodities. Besides this also viral a conversation on Social Media in which he has to use the Rank/Designation of Senior Officers with I/C of the Check Post Khutti in the jurisdiction of PS Dera Town DI Khan as safeguard for his such illicit activities.

2. These acts of your omissions and commissions constitute the offence of misconduct as defined under rule 5 clause 1 of the Police Rules 1975 (amended vide Notification No: 3859/Legal, dated 27/08/2014).

For the purpose of enquiry against the said accused with reference to the above allegation, Mr. ABDUL RAUF BABER, District Police Officer, DI Khan is hereby appointed as Enquiry Officer to conduct proper departmental enquiry under the Rule 6 of Police Rules 1975 amended 2014.

The Enquiry Officer shall, in accordance with the provision of the said Rules, provide reasonable opportunity of the hearing to the accused; record and submit its findings and make, within twenty five days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused official.

The defaulter official and a well conversant representative of the department shall in the proceedings on the date, time and place fixed by the Enquiry Officer.


(ABDUL GHATFOR AFRIDI)

PSP
Regional Police Officer,
Dera Ismail Khan Region.

Annex: "B"


OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN REGION

No. 3709 /ES Dated DI Khan Region the 27 /05/2023

ORDER


The following Police Officers of District DI Khan are hereby placed under suspension and closed to Police Lines DI Khan being involved in getting illegal gratification and smuggling of NCP Vehicles/Articles/Food commodities. Besides this also viral a conversation in which they used rank/designation of senior officers for their such illicit activities with immediate effect:-

1. Inspector Sabir Hussain Acting DSP/Saddar DI Khan.
2. Head Constable Saif Ullah Khan No. 872 I/C CP, Khutti.
3. Head Constable Muhammad Riaz No. 1663 CP, Khutti.


(ABDUL GHAFUOR AFRIDI) PSP
Regional Police Officer,
Dera Ismail Khan Region

No. 3710 /ES

Copy for information & necessary action to District Police Officer, DI Khan with the directions to initiate departmental proceeding against the Police Personnel mentioned at Serial No. 2 & 3 and finding report to this effect be submitted for the perusal of undersigned/further process.


(ABDUL GHAFUOR AFRIDI) PSP
Regional Police Officer,
Dera Ismail Khan Region

بیان اذعان انسپیکٹر صاحبہ حسین D/51

جوالہ چارج شیڈ منجانب RPO صاحب ضلع ڈیرہ اسماعیل خان
 معروض ہونکہ جوالہ وائرل شدہ SMS (آڈیو) مختلف گروپس
 وندرس سلسلہ جوا با معروض ہونکہ من SDPO سرکل
 صدر نے ریاض HC، انچارج گھنٹی جیک پوسٹ کہ گھنٹی
 جیک پوسٹ پر مختلف قسموں کی گاڑیوں، بس ڈیپ سے مختلف
 NCP، فوڈ اینڈ ٹیم کی شکایت وصول ہو رہی ہے آپ گورنر پر
 سختی کریں اور گاڑی وغیرہ کو سزا پر جیک کریں تاہم صاف
 حضرات کسا کو خوش اخلاقی و نرخی سے پیش آئیں۔
 جہاں تک میری وائس میں جناب DIG Po کا ذکر ہے دراصل
 اس میں آفریدی مالک نیو فحشر نے مجھے بذریعہ فون کیلنگ
 تھی کہ میں آپ کے Po DIG کے کھانی کا دوست ہوں میری
 گاڑیوں میں کسی قسم کی کوئی سٹولنگ کا سامان نہیں ہے
 لیکن گھنٹی جیک پوسٹ پر لوہیں میری گاڑیوں کو ٹاھا کر
 کرتا کرتی ہے۔ بدیں وجہ من SDPO سرکل صدر نے حد
 DIG کا نام سہو آئی کہ انچارج گھنٹی جیک پوسٹ کہ
 وائس میں کیا تھا۔
 جناب DIG نے مجھے کسی قسم کی کوئی ہدایت نہیں دی
 البتہ آفریدی مالک طرف سے سٹولنگ کو کنٹرول کرنے

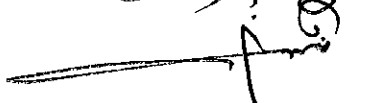
PTO

بالی طور پر حکم وصول ہوئے تھے۔

یہ طریقہ ایک وائس میسج میں مجھے کھیجا گیا جو لوہڈ کے پاس
 تھی۔ اسے باہر نکالنا اور اسے اپنے پاس رکھنا اور اسے اپنے پاس رکھنا
 کرنے پر شکایت وصول ہوئی تھی۔ اس کی باہر تھی SDP سرکل صدر
 نے اسے اپنے پاس رکھنا اور اسے اپنے پاس رکھنا اور اسے اپنے پاس رکھنا
 بھجوانا حکم دیا تھا، جہاں تک *Conversation* اور میسجنگ
 آڈیو وائس ہونی کا الزام ہے اس میں SDP سرکل صدر
 کا کوئی قصور وار نہیں ہے بلکہ جمع میسجنگ ریاض نے
 جان کو بھجوا کر اسٹوڈنٹ یا گروپ میں شیئر کیے ہیں جبکہ
 من SDP نے سٹوڈنٹ کنٹرول کرنے اور مسافرت والی گاڑیوں کو
 باہر نکالنا پر تنگ نہ کرنے کیلئے کھیجا گیا جو لوہڈ اسے اپنے پاس رکھنا
 وائس آپ پر ایسا ہی دیا تھا۔

ملوث
 ڈی ایچ
 ڈی ایچ
 ڈی ایچ

لکھنا ڈاؤن لوڈ کیا کہ قبل کارروائی کارس کار کی بدولت
 عمل میں لائی گئی تھی اس میں کسی قسم کی دلچسپی، رشوت اور بددیانتی
 وغیرہ شامل نہیں ہے داخل دفتر فرمائی جاوے۔


 Insp 1 Dir
 05/6/23
 03467845080



OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION

9966-9280291 Fax # 9280290

No. 4497 /ES

dated D.I.Khan the

12/106/2023

ORDER

This order means to disposes off departmental enquiry against Inspector Sabir Hussain NO D/51 of District Police D.I.Khan on the following allegation that :

Being involved in getting illegal gratification and smuggling of NCP Vehicle/Articles/Food commodities. Besides this also had a conversation on social media in which he has to used rank/designation of Senior Officers with I/C of the Police Check post Khutti in the jurisdiction of PS Dera Town D.I.Khan s safeguard for his such illicit activities. The above commissions/ omissions falls under the purvis of misconduct and inefficiency that renders him liable to be punished under Khyber Pakhtunkhwa Pesahwar, police rules 1975 amended 2014.

- i. RPO D.I.Khan served the defaulter with the charge sheet. Enquiry into the matter was go conducted into through DPO D.I.Khan who in his finding , proved the allegation level against him and recommended for major punishment.
- ii. Later on he was properly issued Final Show Cause Notice, to which he replied nd placed on file.
- iii. He was given an opportunity of personal hearing and after perusal of his written as well as oral explanation, he was found unsatisfactory.
- iv. Keeping in view, I **Abdul Ghafoor Afridi** PSP Regional Police Officer, Dera Ismail Khan in exercise of the Powers conferred upon me under Rule- 5(5) of Police Rules 1975, amended 2014 hereby awarded him **"major punishment of reduction in rank from inspector to sub-inspector with immediate effect.**

Order Announced

(ABDUL GHAFUOR AFRIDI)PSP
Regional Police Officer
Dera Ismail Khan

No. 4497 /ES

Copies to

1. The inspector General of Police Khyber Pakhtunkhwa Peshawar
2. DPO D.I.Khan with reference to his office letter No. 362/ES dated 12/06.2023

EC/OB/PO
For action

(ABDUL GHAFUOR AFRIDI)PSP
Regional Police Officer
Dera Ismail Khan

OB 1544

DT 23-06-2023

S-1 = Sabir Hussain
NO = D/51

26.6.2023

26.6.2023

For Approval

12

OFFICE OF THE
REGIONAL POLICE OFFICER
DERA ISMAIL KHAN
REGION

0966-9280291 Fax# 9280290

No. 4497 /ES dated D.I.Khan the 22/06/2023

ORDER

This order means to disposes off department enquiry against Inspector Sabir Hussain No D/51 of District Police D.I.Khan on the following allegation that:-

Being involved in getting illegal gratification and smuggling of NCP Vehicle/Articles/Food commodities. Besides this also viral a conversation on social media in which he has to used rank/designation of Senior Officers with I/C of the Police Check post Khutti in the jurisdiction of PS Dera Town D.I.Khan's safeguard for his such illicit activities. The above commissions/ omissions falls under the purvies of misconduct and inefficiency that renders him liable to be punished under Khyber Pakhtunkhwa Peshawar, police rules 1975 amended 2014.

- i. RPO D.I.Khan serve the defaulter with the charge sheet. Enquiry into the matter was go conducted into through DPO, DIKhan who in his finding, proved the allegation level against him and recommended for major punishment.
- ii. Later on he was properly issued Final Show Cause Notice, to which he replied and placed on file.
- iii. He was given opportunity of personal hearing and after perusal of his written as well as oral explanations, which was found unsatisfactory.
- iv. Keeping in view, I Abdul Ghafoor Afridi PSP Regional Police Officer, Dera Ismail Khan in exercise of the powers conferred upon me under Rule- 5(5) of Police Rules 1975, amended 2014 hereby award him "**major punishment of reduction in rank from inspector to sub-inspector with immediate effect**".

Order Announced.

- Sd -
(ABDUL GHAFOOR AFRIDI) PSP
Regional Police Officer,
Dera Ismail Khan

No.4498-99 dated: 22/6/2023

Copy to

1. The Inspector General of Police Khyber Pakhtunkhwa, Peshawar.
2. The DPO, D.I.Khan with reference to his office letter No.362/ES dated: 12/6/2023.

- Sd -
(ABDUL GHAFOOR AFRIDI) PSP
Regional Police Officer,
Dera Ismail Khan

Annex: "E"

13



OFFICE OF THE
DISTRICT POLICE OFFICER,
DERA ISMAIL KHAN
☎ 0966-9280062 Fax # 9280293

No. 4253/EC, dated D.I.Khan the 27/06/2023

To: The Regional Police Officer,
Dera Ismail Khan Region

Subject: APPLICATION/APPEAL.

Memo:

It is submitted that Sub-Inspector Sabir Hussain No D/51, of this district police preferred an application/appeal against the punishment of **Reduction In Rank** awarded to him vide your good office Order Endst.No.4498-99/ES dated 22.06.2023.

His application along with attested copy of order bearing OB No.1544 dated 23.06.2023 is enclosed herewith for your kind perusal & onwards submission to quarter concerned, please.


District Police Officer,
Dera Ismail Khan

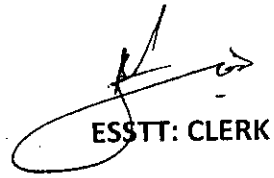
NOTE SHEET

01. Inspector Sabir Hussain No.D/51 of this District Police, preferred a departmental appeal / representation against W/RPO DIKhan office order No.4497-99/ES dated 22.06.2023.

02. If approved, may send his appeal to Worthy Inspector General of Police KPK, Peshawar through Worthy Range Chief DIKhan or otherwise, please.


03. Submitted for order please.

04.


ESSTT: CLERK

05.

~~WORTHY DPO/DIKHAN~~

approved


*CC P.O-1
27/6*

جناب عالی!

بحوالہ ليٲر نمبري 4497-99/ES مورخہ: 22.06.2023 جناب RPO صاحب ڈيرہ اسماعيل خان نے اسٲيڪٲر کے عہدہ سے Demote کر کے

بسلسلہ محکمانہ انکوآزري سب اسٲيڪٲر بنا ديا ہے۔ یہ کہ سائل ذيل عرض گزار ہے۔

1۔ سائل 17.03.2010 کو پبلڪ سروس کميشن کے تھر و بطور PASI بھرتي ہوا اور محکمانہ فرائض سرانجام ديتے ہوئے مورخہ: 16.04.2020 کو بطور اسٲيڪٲر کے عہدہ پر پرموٲ کیا جا چکا ہے۔

2۔ یہ کہ سائل نے اپني سروس کے دوران کوہاٲ ريٲج، بنوں ريٲج، CTD اور مقامي ڈسٲرکٲ ڈيرہ اسماعيل خان ميں بطور SHO و Oii مختلف تھانہ جات ميں ڈيوٲي سرانجام دے چکا ہے اور بدوران سروس کوہاٲ ميں تھانہ جنگل خيل بنوں ميں تھانہ کينٲ اور ڈيرہ اسماعيل خان ميں تمام تھانہ جات خاص کر کلاچي، يارک، چودھوان اور تھانہ کينٲ کے مشکل ترين تھانہ جات ميں کارسرا انجام دے چکا ہے۔

3۔ یہ کہ سائل بدوران سروس انتہائي مشکل حالات ميں بھی کافي کامياب و کامران رہا اور آفسران بالا کے اعتماد کی وجہ سے کافي کاميابياں حاصل کيں جن ميں سے سائل کو 3 دفعہ جناب PPO صاحب کی طرف سے 1-CC معاف تانعام اسی طرح RPO صاحبان و DPO صاحبان کی طرف سے بھی جملہ متعدد 45/50 اچھی کارکردگی کی بنیاد پر سرٹيفيکيٲ معاف تانعامات سے نوازا گیا ہے بطور ثبوت جملہ انٲريٲلف اعمال نامہ ہیں۔

4۔ یہ کہ سائل نے حال ہی ميں بطور SHO کينٲ تعينات تھانہ مشهور ٹيٲلي نار فر نچانز ڈکيٲي کو اندر (3) یوم ملزمان کو ٹريٲس کر کے ضلع لکی مروت علاقہ تجوڑی ميں ملزمان سے مقابلہ کرتے ہوئے ايک ملزم کو انکوٲر کے دوران ہلاک جبکہ (2) ملزمان بر مٲوع گرفتار کر کے جملہ چوري شدہ مال مسروقہ برآمد کیا اسی طرح تھانہ يارک ميں بھی مشهور و بدنام زمانہ نشيات فروش و قاتل نور اسلم کو اندر (1/2) گھنٲے بدوران گرفتاري مزاحمت و مقابلہ پوليس کرنے پر ہلاک کیا اور اہل علاقہ کو خوشي و سکھ کا سانس دلوايا۔

5۔ یہ کہ سائل مورخہ: 09.05.2023 کو اچھی کارکردگی کی بنا پر جناب RPO صاحب نے بطور SDPO صدر سرکل ڈيرہ اسماعيل خان تعينات کیا مورخہ: 25.05.2023 کی شب آفسران بالا کی ہدایت اور عوام کی شکايت پر انچارج کھٲي چيک پوسٲ رياض حسين IHC کو بذريعہ وائس ايٲ و آکس ميٲج کے ذريعہ چنر ہدایات ديں جو کہ انچارج چيک پوسٲ کی غفلت اور ذاتي عناد کی وجہ سے وائرل کرنے پر من SDPO کو جناب RPO صاحب نے بحوالہ ليٲر نمبر 4497-99/ES مورخہ: 22.06.2023 کو انکوآزري ميں قصور وار ٹھہرا کر بطور سب اسٲيڪٲر Demote کر ديا حالانکہ من سائل کا کسی قسم کا کوئی قصور نہ ہے اور نہ ہی من سائل نے کوئی غير قانونی پيغام رساں کیا تھا صرف اور صرف آفسران بالا کے احکامات بذريعہ ميٲج ارسال کيے تھے۔

عالیجاہ۔۔

من سائل کی محکمانہ خدمات کو مد نظر رکھتے ہوئے محکمانہ انکوآزري ميں دی گئی سزا کو ختم کر کے واپس اپنے اصل ريڪ پر بحال کرنے کا حکم صادر فرمایا جاوے۔

سائل تازيست دعا گو رہے گا۔

مورخہ: 26.06.2023

ارض

سب اسٲيڪٲر ضا بر حسين نمبر 51-D متعینہ ڈسٲرکٲ ڈيرہ اسماعيل خان

جناب عالی!

بکار سرکار معروض ہوں کہ من انسپکٹر کو بحوالہ آرڈر نمبر 4497-99/ES مورخہ 22.06.2023 مجاریہ جناب RPQ صاحب Demote کیا جا کر سب انسپکٹر بنا دیا گیا ہے۔ اندریں جناب اپیل کا حق رکھتے ہوئے آنجناب RPO صاحب کو اپیل کرنا چاہتا ہے۔

لہذا استدعا ہے کہ من سائل کی درخواست بمراد اپیل دفتر جناب PPO صاحب بھجوائی جاوے۔
عین نوازش ہوگی۔

مورخہ: 26.06.2023

ارضی

سب انسپکٹر صابر حسین D-51 ڈیرہ اسماعیل خان

وکالت نامہ

کوٹ فیس		قیمتی ایک روپیہ
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Before the Honourable KP Service Tribunal
Complaint District

مخائب
نام

دعویٰ یا جرم
تفصیل دعویٰ یا جرم

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی وجوہ دی پیشی یا تصفیہ مقدمہ نام D. I. Khan

Muhammad Abdullah Baloch A/c

کو جب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بذریعہ رو برو عدالت حاضر ہوں گا اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر مقام پکھری کے علاوہ اور جگہ ساعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا منت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل ساختہ پر داخستہ صاحب موصوف مشل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ یا درخواست اجراء اسمائے ذمیری نظر ثانی اپیل گمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر بلائی یا راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مقرر بیرون از پکھری صدر بیرونی مقدمہ مقرر نظر ثانی اپیل و گمرانی و برآمدگی مقدمہ یا منسوخی ذمیری یک طرفہ یا درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از فیصلہ اجراء ذمیری بھی صاحب موصوف کو بشرط ادا ایگی علیحدہ مختصم بیرونی کا اختیار ہو گا اور تمام ساختہ پر داخستہ صاحب موصوف مشل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی یا بصورت درخواست نظر ثانی اپیل گمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا پیر سٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور دیے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے

مورخہ _____ ماہ _____

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

Accepted
Muhammad Abdullah
03146932557