


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

2271/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	01/11/2023	<p>The appeal of Mr. Aziz Ullah presented today by Mr. Kamran Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

APPEAL No. 2271 /2023

AZIZ ULLAH VS FOREST DEPTT:

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APPELLANT

THROUGH:


KAMRAN KHAN
ADVOCATE

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

SERVICE APPEAL NO. 2271 /2023

Mr. Aziz Ullah, Forest Guard,
Forest Division, Dir Upper.

.....**APPELLANT**

VERSUS

- 1- The Chef Conservator of Forests, Malakand Forest Region (Region-III), Saidu Sharif Swat.
- 2- The Conservator of Forests, Malakand Forest Circle West, Timergara.
- 3- The Divisional Forest Officer, Upper Dir Forest Division.

.....**RESPONDENTS**

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED APPELLATE ORDER DATED 11.10.2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS PARTIALLY ALLOWED BY CONVERTING THE MAJOR PENALTY OF REMOVAL FROM SERVICE TO REDUCTION OF INITIAL PAY STAGE FOR A PERIOD OF THREE YEARS AND TREATING INTERVENING PERIOD AS LEAVE WITHOUT PAY.

PRAYER:

That on acceptance of this service appeal the impugned appellate order dated 11.10.2023 may very kindly be modified/ rectified by restoring the appellant at his original/ current stage of pay scale on 14-07-2023 as well as the respondents by directed count the intervening period as period spent on duty with all back benefits. Any other remedy which this august Tribunal deems fit that may also be granted in favor of the appellant.

R/SHEWETH:

ON FACTTS:

- 1- That the appellant is an employee of the respondents department and is performing his duty as Forest Guard quite efficiently and whole heartedly and up to the entire satisfaction of his superiors.

- 2- That while performing his duty with devotion and honesty the appellant was charge sheeted and statement of allegations was issued to him whereby charging the appellant for not checking vehicles at the check post.
- 3- That the appellant in response to the charge sheet submitted his detailed reply and explain the entire position regarding the alleged charges.
- 4- That after submitting reply to the charge sheet, the appellant was quite hopeful for his exoneration from the alleged charges but astonishingly vide order dated 14.07.2023 the appellant was removed from service. Copy of the order dated 14.07.2023 is attached as annexure **A.**
- 5- That appellant feeling aggrieved from the order dated 14.07.2023 preferred departmental appeal before the appellate authority by explaining the entire position submitting his justification regarding the allegation so leveled. Copy of the departmental appeal is attached as annexure**B.**
- 6- That departmental appeal of the appellant was partially accepted vide order dated 11.10.2023 by converting the major penalty of removal from service to that of reduction to initial stage of pay scale for period of three years. Copy of the appellant order dated 11.10.2023 are attached as annexure**C.**
- 7- That the appellant feeling aggrieved from the appellate order and having no other remedy but to file the instant service appeal on the following grounds amongst the others.

GROUND:

- A-That the impugned appellate order dated 11.10.2023 by converting the major penalty of removal from service to that of reduction to initial stage of pay scale for period of three years and treating the intervening period as leave without pay are against the law, facts, norms of natural justice and materials on the record, hence not tenable and liable to be set aside.
- B-That appellant has not been treated by the respondent department in accordance with law and rules on the subjected noted above and as such respondents violated the Article 4 and 25 of the Constitution of Islamic Republic of Pakistan.
- C-That regarding the occurrence a Damage report was lodged but in that report the vehicle registration number is different, however the in the charge sheet the registration number mentioned is never booked by any authority. Copy of the damage report is attached as annexure**D.**

- D-That it is patient to mention here that the appellant was also performing additional duties along with the check post and on the dated of alleged occurrence the appellant was in Badali Bet and in this respect the forester had submitted his affidavit in favour of the appellant. Copies of the relevant documents are attached as annexureE.
- E-That no proper inquiry has been conducted in to the matter and it is necessary to do so that to dig out the real facts.
- F- That no chance of personal hearing and personal defense has been provided to the appellant before imposing the penalty.
- G-That the appellant was not associated in the inquiry which is mandatory in such like allegations.
- H-That at the time of alleged occurrence the appellant was not on official duty.
- I- That the appellant seeks permission to advance any other ground and proofs at the time of hearing.

It is therefore, most humbly prayed that the appeal of the appellant may be accepted as prayed for.

Aziz Ullah
APPELLANT
AZIZ ULLAH

THROUGH:

Kamran Khan
KAMRAN KHAN

&

Waleed Adnan
WALEED ADNAN
ADVOCATES

AFFIDAVIT

I do hereby solemnly affirm that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and nothing have been concealed from this Honorable tribunal.

Aziz Ullah
DEPONENT

OFFICE ORDER

No. 07 dated 14/07/2023.

Email: dfoupperdir@gmail.com



ISSUED BY MR. MUHAMMAD USMAN
DIVISIONAL FOREST OFFICER
UPPER DIR FOREST DIVISION

Phone 0944-881715, Fax 0944-881713

Whereas, the officials mentioned below were charge sheeted on account of illegal movement of timber, as on 31/05/2022 a Hino Oil Truck bearing hand written registration No.C-2605 loaded with illicit timber of 43 Nos Deodar scants having volume = 172 cft apprehended by staff of Lower Dir Forest Division crossed Unkar, Sahibabad, Warri & Akhgram Forest Check Post, Upper Dir Forest Division without stopping and checking and proceeded against under Government of Khyber Pakhturahwa, Efficiency & Disciplinary Rules, 2011, Rule 5 for the charges as mentioned in charge sheet and statement of allegations served upon them.

- (i). Mr. Saddiq-ur-Rehman, Forest Guard
- (ii). Mr. Saif-ul-Islam, Forest Guard
- (iii). Mr. Aziz Ullah, Forest Guard
- (iv). Mr. Muhammad Rafiq, Forest Guard
- (v). Mr. Niaz Muhammad, Barrierman

Whereas, enquiry has been entrusted to Mr. Saeed Ahmad, the then Sub Divisional Forest Officer, Litigation, Upper Dir Forest Division vide this office order No.92, dated 22/06/2022 under Rule, 10 of ibid rules.

Subsequently personal hearing was held on 20/02/2023 in the office of the Divisional Forest Officer, Working Plan Unit-IV Kanjo Swat.

Whereas, the accused officials have been provided proper chance of defense and proper enquiry has been conducted by enquiry officer under the prescribed rules appointed for the purpose.

Whereas, the enquiry officer after finalization of the inquiry proceeding submitted his findings to the Divisional Forest Officer, Upper Dir Forest Division, the competent authority and concluded that the charges of inefficiency leveled against the above officials has been proved.

Now Therefore, I Mr. Muhammad Usman, Divisional Forest Officer, Upper Dir Forest Division, the competent authority after having considered the charges/evidence on record, hearing them in person and in exercise of powers conferred upon me under Rule 07 (f) read with Rule-4(1) (b) (ii) (iii) of the ibid rules, has been pleased to impose the penalty of "**COMPULSORY RETIREMENT**" upon the official at Sr. No. v namely Mr. Niaz Muhammad, Barrierman and impose the penalty of "**REMOVAL FROM SERVICE**" upon the officials at Sr. No. i, ii, iii & iv namely Mr. Saddiq-ur-Rehman, Forest Guard, Mr. Saif-ul-Islam, Forest Guard, Mr. Aziz Ullah, Forest Guard & Muhammad Rafiq, Forest Guard for the charges leveled against them.

Sd/-
(Muhammad Usman)
Divisional Forest Officer
Upper Dir Forest Division,

No. 204-210/Estt,

1. Copy for information forwarded to the:-
2. Conservators of Forests, Malakand West Forest Circle Timergara.
3. Principal, Khyber Pakhtunkhwa Forest School at Thai Abbottabad.
4. Mr. Saeed Ahmad, Sub Divisional Forest Officer, Khar Forest Sub Division, Bajaur Forest Division, Bajaur (Enquiry Officer).
5. Sub Divisional Forest Officer, Dir/Warri and Range Forest Officer, Darrora for information and necessary action.
6. Office Assistant/Accountant Upper Dir Forest Division for information and necessary action.
7. Officials concerned.
8. Office record file.

Recive by Aziz Ullah

on Date 28/07/2023

Divisional Forest Officer,
Upper Dir Forest Division,
At Dir.

"B" -5-

BEFORE THE WORTHY CONSERVATOR OF FORESTS
PUNJAB AND WEST FOREST CIRCLE TIMERGARA

SUBJECT: DEPARTMENTAL APPEAL AGAINST
OFFICE ORDER No. 07 dated 14.7.2023
ISSUED BY DFO UPPER DIR F/ DIVISION

Respected Sir,

It is respectfully stated that:-

- (1) The appellant is the resident of Gandigan
Upper Dir District and was serving as Forest Guard
BPS-8 in Upper Dir Forest Division since 2017. While
posted at warrai Forest Check Post of Upper Dir Forest
Division, the appellant was proceeded against under
Govt of Khyber Pakhtunkhwa Govt: Servants (Efficiency
and Discipline) Rules, 2011 and a major penalty of
"REMOVAL FROM SERVICE" has been imposed in the charges
of In-efficiency, mis-conduct and Corruption vide
DFO Upper Dir office order No: 07 dated 14.07.2023, copy
enclosed as Annex-"A" for favour of perusal please.
- (2) The respective DFO Upper Dir served upon the
appellant a Charge Sheet and Statement of allegations
and appointed Mr. Saeed Ahmad S.D.F.O. as Enquiry officer
to conduct proper enquiry and probe into the allegations
vide his office No. 92 dated 22.06.2022. It was alleged
in the charge sheet and Statement of allegation that a Lino
Trailer bearing hand writing registration No. C-2605
was loaded with illicit timber of 43 Nos. Deodar scanty of

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BEFORE THE WORTHY CONSERVATOR OF FORESTS MALAKAND
WEST FOREST CIRCLE TIMERGARA

Subject: **DEPARTMENTAL APPEAL AGAINST OFFICE ORDER NO.
07 DATED 14/07/2023 ISSUED BY DFO UPPER DIR
F/DIVISION**

Respected Sir,

It is respectfully stated that:

1. The appellant is the resident of Gandigar Upper dir District and was serving as Forest Guard BPS-8 in Upper Dir Forest Division since 2017, while posted at Warrai Forest check Post of Upper Dir Forest Division, The appellant was proceeded against under Govt. of Khyber Pakhtunkhwa Govt. Servants (Efficiency and Discipline) Rules, 2011 and a major penalty of "REMOVAL FROM SERVICE" has been imposed in the charges of in-efficiency, mis-conduct and corruption vide DFO Upper Dir Office Order No. 07 dated 14/07/2023, copy enclosed as Annexure-A for favour of perusal please.
2. That respective DFO Upper dir served upon the appellant a charge sheet and statement of allegations and appointed Mr. Saeed Ahamd SDFO as Enquiry Officer to conduct proper enquiry and probe into the allegations vide his office No. 92 dated 22/06/2022. It was alleged in the charge sheet and statement of allegation that a Hino Oil Tanker bearing hand writing Registration No. C-2605 loedged with illicit timber of 43 Nos Deodar Seants of

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various sizes = 172.0 cft was apprehended by the Staff of Lower Div Forest Division Tumergara on 31.5.2022. It was further alleged that the said oil Tanker crossed warrai forest check post un-checked due to in-efficiency and laxity on the part of the appellant.

(3) In response, the appellant furnished his defence reply of the charge sheet and statement of allegations to the respective Enquiry officer where in the charges of In-efficiency, Mis-conduct and Corruption were denied and it was stated that on the date of incident (31.5.2022) the appellant was not present at Warrai Forest Check Post and Mr. Niaz Muhammed Barrievnan accompanied by ~~by~~ Div Levy officials were present on duty. The appellant was gone to Badalau Beat of Nihag Range in connection with a complaint about illegal cutting of trees. The timber seized in the damage report dated 12.05.2022 was to be transported to Warrai Forest Sub-Station.

It was further stated in the reply that the appellant has always performed his duty on the check post honestly and the barrier is kept closed during the course of searching/checking of vehicles. So far recording of CCTV-Cameras is concerned due to un-availability of Salavization system (which has not been provided) the cameras recording videos when electric power is not available. However, in the absence of electric power due to load shading by P.E.S.O, the cameras become

BETTER COPY OF THE PAGE NO. 6-

Various sizes = 172.0 cft was apprehended by the staff of Lower Dir Forest Division Timergara on 31/05/2022. It was further alleged that the said oil tanker crossed Warri Forest Check Post unchecked due to in-efficiency and laxity on the part of the appellant.

3. In response, the appellant furnished his defence reply of the charge sheet and statement of allegations to the respective Enquiry Officer where in the charges of in-efficiency, mis-conduct and corruption were denied and it was stated that on the date of incident (31/05/2022) the appellant was not present at Warrai Forest Check Post and Mr. Niaz Muhammad Bassierman accompanied by Dir Levy Officials were present on duty. The appellant was gone to Badalai Beat of Nihag Dana in connection with a complaint about illegal cutting of trees. The timber seized in the damage report No. 1088/22 dated 27/05/2022 was to be transported to Warrai Forest Sub Division.
4. It was further statement in the reply that the appellant has always performed his duty on the check post honestly and the barrier is kept closed during the course of searching/checking of vehicles. So far to recording of CCTV Cameras is concerned due to non-availability of Solarization System (which has now been provided) the cameras recording videos when electric power is available, however, in the absence of electric power due to lead shading by PESCO, the Cameras become

workless. When any fault in operating system of cameras is noticed, the cameras operator is called for repair and correctness.

- 5) Further more, the appellants declared on oath of Almighty Allah that he has no concerns with this incident of smuggling of illegal timber nor the appellants want to indulge himself in such like material corrupt practices and requested to the Enquiry officer to exonerate the appellants from all the charges/allegations.

Unfortunately, the reply of the appellants has been turned down by the respective Enquiry officer that any valid/solid reasons and held the appellants guilty of the charges of In-efficiency, Mis-conduct and Corruption and submitted his report to the respective DFO upper Div for taking further action in accordance with the provision of Efficiency and Discipline Rules 2011. The DFO upper Div first of all served upon the appellants a "SHOW CAUSE NOTICE" bearing No. 6691-96/EST dated 29.05.2023 where in the appellants was asked to show cause as to why minor/major penalties as specified in Rule-4(c) of the E & D Rules, 2011 may not be awarded to the appellants.

- 7) Necessary reply of the Show Cause Notice was furnished to the respective DFO upper Div and the reply of the charge sheet and statement of allegations was repeated with the request to exonerate the appellants.

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Workless when any fault in operating system of cameras is noticed, the cameras operator is called for repair and correctness.

5. Furthermore, the appellant declared on oath of Almighty Allah that he has no concern with this incident of smuggling of illegal timber nor the appellant want to indulge himself in such like mal and corrupt practices and requested to the Enquiry Officer to exonerate the appellant from all the charges/allegations.
6. Unfortunately, the reply of the appellant has been turned down by the respective Enquiry Officer without any valid/solid reasons and held the appellant guilty of the charges of in-efficiency, misconduct and corruption and submitted his report to the respective DFO Upper Dir for taking further action in accordance with the provision of Efficiency and Discipline Rules, 2011. The DFO Upper Dir Forest Division served upon the appellant a "SHOW CAUSE NOTICE" bearing No. 6691-96/Estt: dated 29/05/2023 where in the appellant was asked to show cause as to why minor/major penalties as specified in Rule-4(a) of the E&D Rules 2011 may not be awarded to the appellant.
7. Necessary reply of the Show Cause Notice was furnished to the respective DFO Upper Dir and the reply of charge sheet and statement of allegations was repeated with the request to exonerate the appellant.

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from all the charges/allegations, however, the same has not been considered and the major penalty of "REMOVAL FROM SERVICE" has been imposed upon the appellant vide DFO upper Div office order no. 07 dated 14.07.2023 which is against the law, rules, regulations, norms of justice and un-justified/un-tenable due to the following reasons:-

(i) The appellant has clearly stated in his reply to the charge sheet/Statement of allegations and Show Cause Notice that the appellant was not present in Warran Forest Check Post and was gone to Badalai Beat of Nihag Darga, the additional charge of the said "Beat" also exists with the appellant. On the date of the said incident, Mr. Niaz Muhammad Bariernan accompanied by Div Levy officials were present at the Check Post. However, the respective DFO upper Div (Authority) as well as Enquiry officer have totally ignored the realistic plea of the appellant without any valid/solid reasons.

(ii) As the illegal timber was loaded in oil Tanker specially prepared for smuggling of timber (in the shape of oil Tanker) and its detection at the check Post in routine checking was not possible without the accurate information of "LOCAL INFORMER". It has been learnt through reliable source that the said oil Tanker was apprehended by the Divisional Raid Party headed by SDFo Tame, GARA

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on the directives of respective DFO Lower Div who received secret information in this regard from a confidential Informer where the timber loaded.

(ii) During the course of personal hearing with the Enquiry officer, the appellant complained about the burden of additional duty of plantations and forest beat which has been incorporated in the enquiry report, however, this aspects of the case in respect of the appellant has totally been ignored without recording any valid/solid reasons by the Enquiry officer.

(iii) The Supervision of "Badalai Beat" is also necessary from time to time to protect the valuable forests from illegal cutting of trees. Similarly, the supervision of plantation is also necessary from time to time in order to safeguard the huge amount invested in these projects by the Govt. instead of watching, counting and passing of oil tankers on the roads.

(iv) Warrari Forest check post is situated on main Chaledawa - Chitral road and the huge traffic of loaded vehicles as well as public transport of Dir Upper, Dir Kohistan and Chitral (Upper/Lower) are passing through this check post. More than five (5) dozens of oil Tankers are daily passed through this check post up and down, therefore, detection of such a specific oil tanker and unique method/technique of timber smuggling at a check post is a difficult job, however such

(P/6)

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Lack of identification of oil tanker used for smuggling of timber could not be termed to the in-efficiency and negligence on the part of appellant. Awarding of severe punishment of "Removal from service" in such like unique case of smuggling of timber is totally unjustified and against the norms of social/natural justice.

(vi) The charges/allegations against the appellant have neither been proved with certainty by the respective Enquiry officer nor any evidence, proof and video of is available of crossing the said oil tanker through various forest check post, therefore, the appellant is totally innocent in the instant case of smuggling of illegal timber.

(vii) It is pointed out that during the course of his short service of about six (6) years in the department, the appellant has always performed his duties, honestly, devotedly and upto the best satisfaction of higher officers and has never indulged himself in any corrupt practices which is also evident from his service record.

(viii) The appellant is presently under training for the last one year at Sarhad Forest School Abbottabad (T-1) and passing out will be held on 31.8.2023. The appellant is deserving to be promoted to the rank of Forester on the basis of Seniority-cum-fitness against the existing vacancies in Upper Division soon after completing one year training, therefore, the appeal of the appellant may kindly be considered on humanitarian grounds.

(1/7)

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It is therefore prayed that by accepting this appeal of the appellant on humanitarian grounds, the impugned office order No: 07 dated 11.07.2023 issued by the respective D/o Upper Dir may be set aside and the appellant be re-instated in service from the date of removal from service with all back benefits. For this act of kindness, the appellant will be highly obliged/thankful and will pray for the prosperity of your good self.

9) The appellant also wish to be heard in person please.

Thanks.

Yours obediently,
Aziz Ullah

(AZIZ ULLAH)

EX-FOREST GUARD WARRAT.

FOREST CHECK POST WARRAH

(UPPER DIR FOREST DIVISION)

"C" -12-

NO. 14 DATED 11 /10/2023 ISSUED BY MR. SHAUKAT FAIZ CONSERVATOR OF
FORESTS MALAKAND WEST FOREST CIRCLE TIMERGARA.

1. Whereas, Mr. Aziz Ullah as Forest Guard (appellant) was proceeded under E&D Rules, 2011 and proper charge sheet issued by the DFO Dir Upper with the following charges;
 - a. Misconduct.
 - b. Inefficiency.
 - c. Corruption.
2. Whereas, proper inquiry proceeding was conducted against the accused vide DFO Upper Dir Office Order No. 92 dated 22/06/2020.
3. Whereas, the inquiry officer after fulfillment of the codal formalities on the subject, recommended that the charges against the accused official base on fact.
4. Whereas, the competent authority (DFO Upper Dir) served show cause notice upon the accused official vide DFO Upper Dir No.6691/Estt, dated 29/05/2023. Subsequently, the accused official responded to the show cause notice on 5/6/2023, which was found unsatisfactory.
5. Whereas, the accused Official was awarded major penalty of "REMOVAL FROM SERVICE" vide DFO Upper Dir Office Order No. 07 dated 14/07/2023.
6. Whereas, the appellant being aggrieved with the penalty awarded by DFO Upper Dir, filed the departmental appeal to the undersigned (appellate Authority) requesting to set aside the penalty.
7. Whereas, Para wise comments were asked form DFO Upper Dir vide this office letter No.856/E, dated 21/08/2023. The DFO Upper Dir furnished the requisite comments vide his office memo No.885/Estt, dated 29/08/2023. On receipt of the comments, the appellant was provided opportunity of being heard / Personal hearing on 28.09.2023 in the office of Conservator of Forests Malakand West Forest Circle vide memo No.1561-65/E dated 21/09/2023.
8. Whereas, on perusal of record, comments of the D.F.O Upper Dir and personal hearing of the appellant the facts surfaced that the illegal timber was transported in Hino Oil Tanker bearing Registration No.C-2605 and has crossed Warri Forest Check Post with active connivance of appellant. Hence the charges leveled against him are proved with certainty.

ORDER:-

I Mr. Shaukat Fiaz Conservator of Forests Malakand West Forest Circle Timergara in the capacity of appellate authority hereby convert the penalty of "REMOVAL FROM SERVICE" to reduction to initial stage of his pay Scale for a period of Three (3) years and the intervening period from 14/07/2023 to 10/10/2023 is treated as leave without pay.

Sd/-

(SHAUKAT FIAZ)
CONSERVATOR OF FORESTS
MALAKAND FOREST CIRCLE WEST
TIMERGARA

No. 1933-36E.

Copy to:-

1. The Chief Conservator of Forests, Central Southern Forest Region-I Peshawar for favour of information please.
2. The Chief Conservator of Forests, Malakand Forest Region (Region-III) Saidu Sharif Swat for favour of information please.
3. The D.F.O Upper Dir, Forest Division for information and necessary action.
4. The Official concerned.

CONSERVATOR OF FORESTS
MALAKAND FOREST CIRCLE WEST
TIMERGARA

ابتدائی رپورٹ گارڈ بابت جنگل تیرگرہ دیر روڈ بمقام شردین فارسٹ چیک پوسٹ تیرگرہ سب

ڈویژن

نام جنگل	تاریخ وقوع	خلاصہ جرم	نام ملزم	ولدیت	سکونت
جنگل تیرگرہ	21/05/2022	غیر قانونی	سہراب اللہ	رضاء اللہ	سکنہ تولنڈی دیر
دیر روڈ بمقام	31/05/2022	سلیپران از قسم دیار			اپر
شردین		487 عدد بذریعہ			
فارسٹ چیک		ہینو ٹینکر نمبر			
پوسٹ		6202			

جناب عالی

گزارش ہے کہ مورخہ 31/05/2022 مخبر کی اطلاع کو بروئے کار لاتے ہوئے افسران بالا کی ہدایت کی روشنی میں ایک ریڈ پارٹی تشکیل دی گئی، خلیل اللہ فارسٹ، محمد انور فارسٹ گارڈ اور آیاز خان نائب قاصد بمقام شردین فارسٹ چیک پوسٹ ناکہ بندی کی دوران چیکنگ اسی اثناء ایک ہینو ٹینکر سفید نمبر C-6202 آ کر روکنے کا اشارہ دیا، گاڑی مذکورہ کو روک کر تلاشی لینے پر گاڑی کے خفیہ خانوں سے سلیپران ڈیور تیرگرہ پہنچایا گیا، ملزم سے قانونی اجازت نامہ طلب کیا جو نہ پیش کر سکا ملزم سے نوٹس گاڑی جرمانہ، عوضانہ اور قیمت مال بحوالہ رسید نمبر 366/6 دیکر مبلغ 1002700/- دس لاکھ دو ہزار دو سو روپے وصول کر کے مال مسروقہ کو بروئے لوکل استعمال واگزار کیا گیا۔

لہذا ملزم بالا کے خلاف ڈیپٹی رپورٹ نمبر 522 چاک کر کے برائے کارروائی پیش خدمت ہے۔

بیڈ گارڈ بلاک آفیسر

سب ڈویژن فارسٹ آفیسر

"E"
-14-

بابت ۱۰۰ روپيا (100/-) جي رقم جي واپس ڪرڻ لاءِ درخواست ڪرڻ

۱. ۲۰۱۵ جي ۱۱/3/2015 تي DF.O سان ڪيل ملاقات ۽ ڊوڪيومينٽ

۲. ۲۰۱۵ جي ۵ مارچ تي ۵۵۲/3 هڪ ٻيڙي جي ڏانهن

۳. ۲۰۱۵ جي ۱۴ مارچ تي ۱۱/3/2015 تي ۵۵۲/3 هڪ ٻيڙي جي ڏانهن

۴. ۲۰۱۵ جي ۱۴ مارچ تي ۱۱/3/2015 تي ۵۵۲/3 هڪ ٻيڙي جي ڏانهن

۵. ۲۰۱۵ جي ۱۴ مارچ تي ۱۱/3/2015 تي ۵۵۲/3 هڪ ٻيڙي جي ڏانهن

۱. ۲۰۱۵ جي ۱۴ مارچ تي ۱۱/3/2015 تي ۵۵۲/3 هڪ ٻيڙي جي ڏانهن

۲. ۲۰۱۵ جي ۱۴ مارچ تي ۱۱/3/2015 تي ۵۵۲/3 هڪ ٻيڙي جي ڏانهن

۳. ۲۰۱۵ جي ۱۴ مارچ تي ۱۱/3/2015 تي ۵۵۲/3 هڪ ٻيڙي جي ڏانهن

۴. ۲۰۱۵ جي ۱۴ مارچ تي ۱۱/3/2015 تي ۵۵۲/3 هڪ ٻيڙي جي ڏانهن

۵. ۲۰۱۵ جي ۱۴ مارچ تي ۱۱/3/2015 تي ۵۵۲/3 هڪ ٻيڙي جي ڏانهن

۶. ۲۰۱۵ جي ۱۴ مارچ تي ۱۱/3/2015 تي ۵۵۲/3 هڪ ٻيڙي جي ڏانهن

جارج ڊهنڙو

مئنيجنگ ڊائريڪٽر

جارج ڊهنڙو
مئنيجنگ ڊائريڪٽر
۲۹

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چارچ نوٹ مابین ارشد فارسٹ گارڈ اور عزیز اللہ فارسٹ گارڈ

آج بمورخہ 16/03/2021 کو DFO صاحب دیر بالا فارسٹ ڈویژن بحوالہ آرڈر نمبر 56 مورخہ 04/03/2022 کی تعمیل کرتے ہوئے میں ارشد FG انچارج بڈالی بیٹ نہاگ بلاک اور چارج واڑی فارسٹ چیک پوسٹ یہ چارج نوٹ عزیز اللہ FG کو چارج حوالہ کیا گیا۔ درج ذیل ذمہ داریاں جو میرے ذمہ تھیں اس چارج نوٹ کے ذریعے عزیز اللہ FG کو حوالہ کیا گیا۔

- 1- بڈالی بیٹ کمپائمنٹ نمبر 1 تا 16 نہاگ بلاک
- 2- واڑی فارسٹ چیک پوسٹ کی ذمہ داری
- 3- ایک عدد گارڈ بک نمبر 13 صفحہ نمبر 1 تا 85 چاک شدہ باقی سالم ہیں۔
- 4- ایف اے ٹیشن ایریا مرہا شریف 10B.T.F 25 ہیکٹرز
- 5- ایف اے ٹیشن ایریا منزی 10-B-T-F 12 ہیکٹرز

درجہ بالا ذمہ داریاں عزیز اللہ فارسٹ گارڈ کو حوالہ کر رہا ہوں

چارچ گرہندہ

عزیز اللہ فارسٹ گارڈ

دستخط انگریزی

چارچ ڈہندہ

ارشد فارسٹ گارڈ

دستخط انگریزی

15- صلوات نام

تذکرہ لکھی جانے والی 22 میں عزیز کے نام کے ساتھ بیروت اور شہر بغداد اور عراق

کے نام کے ساتھ لکھی جانے والی عزیز کے نام کے ساتھ بیروت اور شہر بغداد اور عراق

بیروت اور شہر بغداد اور عراق کے نام کے ساتھ لکھی جانے والی عزیز کے نام کے ساتھ

بیروت اور شہر بغداد اور عراق کے نام کے ساتھ لکھی جانے والی عزیز کے نام کے ساتھ

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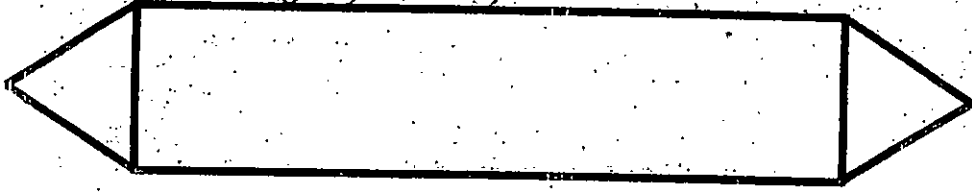
حلف نامہ

تصدیق کی جاتی ہے کہ میں غلام فارسٹ بلاک افسر نہاگ اقرار کر کے لکھ دیتا ہوں کہ عزیز اللہ فارسٹ گارڈ میرے ساتھ بڈالی پوسٹ شوکنڈ کپارٹمنٹ 1 سے 16 بیٹ گارڈ تھا، بمورخہ 27/05/2022 کپارٹمنٹ نمبر 15 میں غیر قانونی کٹائی گئی تھی جس پر میرے موجودگی میں ڈیج رپورٹ چاک مال مسروپہ (پلر ان) ٹائم شارٹ ہونے کے سے سپرداری پردی بمورخہ 30/05/2022 عزیز اللہ فارسٹ گارڈ ان سپرداری پردی گئی، لکڑی واڑی سب ڈویژن کو لے جانے کیلئے آیا، لیکن جگہ روڈ سے دور تھی اور روڈ تک لڑکی لانے کیلئے کافی وقت خرچ کرنا پڑا اور ہم رات وہاں گزارا بمورخہ 31/05/2022 کو مذکورہ لکڑی گاڑی میں لوڈ کر کے شام کو واڑی فارسٹ ڈویژن پہنچایا جو کہ میں غلام محمد فارسٹ و عزیز اللہ فارسٹ گارڈ موجود تھا اور سب کچھ میرے روبرو کی گئی، یہ میرا بیان ہے۔

دستخط انگریزی

غلام محمد فارسٹ نہاگ درہ بلاک

بعدالت ممبروں کے اصول پر



2 منجانب
عسکر اللہ بنام نور محمد

مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
کیلئے حکام مرزا خان + ولد پرنال
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ از عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج 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 مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے
سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔
کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Accepted
[Signature]

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ماہ

المرقوم

واہ العبد العبد