


FORM OF ORDER SHEET

Court of _____

Appeal No. 264/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	12/02/2024	<p>The appeal of Mr. Haq Nawaz received today by registered post through Shad Muhammad Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL

K.P. PESHAWAR

A. No. 264/2024

Haq Nawaz.....Appellant

Versus

DPO Battagram etc.....Respondents

APPEAL

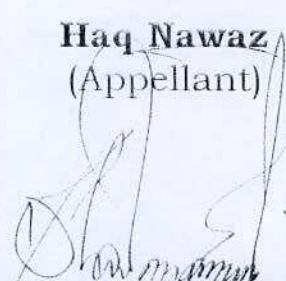
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Dated 09/02/2024

Haq Nawaz
(Appellant)

Through: -


SHAD MUHAMMAD KHAN
Advocate Supreme Court of
Pakistan (Mansehra)

P-①

BEFORE THE SERVICE TRIBUNAL
K.P. PESHAWAR

A - No. 264/2024

Haq Nawaz son of Anwar Khurshid,
resident of Chappar Gram, Tehsil and
District Battagram, FC No. 21 District
Battagram.....**Appellant**

Versus

- 1) DPO Battagram,
- 2) DIG Hazara Range Abbottabad
.....**Respondents**

APPEAL UNDER SECTION 4 OF
SERVICE TRIBUNAL ACT AGAINST
THE ORDER OF RESPONDENT NO. 1
DATED 03.10.2023 VIDE WHICH THE
APPELLANT HAS BEEN REVERTED/
DEMOTED TO THE RANKE OF
CONSTABLE.

Respectfully Sheweth!

The brief facts leading to the instant
appeal are arrayed as follows: -

- 1) That, the appellant was appointed
as a constable in Police Department
in District Battagram on
19.09.2000.
- 2) That, the appellant was assigned
special duty as a driver and such
assignment of duty is evident from
the order book No. 64 dated

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20.05.2005. The appellant thereafter carried out duties as a driver since 20.05.2005.

(The copies of order books and subsequent transfers to other police stations are attached as Annexure "A", "B", "C" & "D" respectively)

- 3) That, DPO/respondent No. 1 passed an order bearing No. 1936-39 dated 13.03.2013 vide which the appellant was posted as driver in the light of order of KPK, PPO notification bearing No. 21094/E-2, dated 26.07.2008, memo No. 222-253/A-3 dated 04.01.2023.

(The copy of posting as driver is attached as Annexure "E")

- 4) That, a departmental promotion board was constituted consisting of DPO Battagram, DSP Battagram and DSP Allai for the promotion of appellant and others and appellant was promoted as Head Constable driver vide order No. 1509-93/SRC dated 12.10.2015.

(The copies are attached as Annexure "F" & "G" respectively)

- 5) That, respondent No. 1/DPO Battagram issued an order No. 7903-07 dated 03.10.2023 vide which the DPO passed an order through which the appellant was

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reverted/demoted to the rank of driver constable BPS-07.

(The copy of order is attached as Annexure "H")

- 6) That, the appellant aggrieved by the order of DPO Battagram submitted an appeal before respondent No. 2 and his request for setting aside the order of DPO was turned down.

(The copies of appeal are order are attached as Annexure "I" & "J")

That, the appellant assails the orders of his reversion/demotion on the following amongst other grounds: -

GROUND: -

- A)** That, the orders passed by DPO Battagram and DIG Hazara Range both are against the facts patent on record and are also opposed to law and hence the orders are not maintainable in the eye of law.
- B)** That, the appellant was posted as a driver not on the request of appellant rather he was posted or assigned such duties by the department.
- C)** That, while passing the order of driver, respondent No. 1 has referred to a notification issued by IGP and in the light of said

(4)

notification the appellant was posted as driver.

- D)** That, DPC was constituted consisting of DPO and SP Investigation DSPs who found the appellant quite fit for promotion and order of promotion was passed by respondent No. 1 on the basis of merits.
- E)** That, after about 21 years of his service in police department in district Battagram the appellant was reverted to the rank of FC driver which is a sheer malafide and discrimination on the part of department.
- F)** That, the appellant's course mates are serving in the department and have been promoted to the rank of ASI whereas the appellant who was posted as a driver by DPO Battagram and later-on promoted to the rank of Head Constable is reverted to the rank of driver constable. The appellant was assigned the post of driver constable who served the department according to their needs and now after 21 years of service altogether a different phenomena has been

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invented and appellant has been reverted to the rank of constable.


- G) That, had the appellant been left at his original place in the department, he would have been promoted to the rank of Head Constable/ASI like his course mates who are serving as ASI in district Battagram. The appellant had never requested to be posted as driver constable or Had Constable but according to the needs he was posted by the department and after promotion as Head Constable he stood reverted to the rank of FC driver which is a sheer malafide on the part of department.

It is, therefore, most humbly prayed and requested that on acceptance of appeal the impugned order of reversion/demotion may kindly be set aside and the appellant may kindly be promoted to the rank of Head Constable.

Dated 09/02/2024

Haq Nawaz
(Appellant)

Through: -


SHAD MUHAMMAD KHAN
Advocate Supreme Court of
Pakistan (Mansehra)

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VERIFICATION

I, HAQ NAWAZ SON OF ANWAR KHURSHID, RESIDENT OF CHAPPAR GRAM, TEHSIL AND DISTRICT BATTAGRAM, FC NO. 21 DISTRICT BATTAGRAM DO HEREBY VERIFY THAT THE CONTENTS OF FORE-GOING OF FORE-GOING APPEAL ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

Haq Nawaz
HAQ NAWAZ
(DEPONENT)

(7)

BEFORE THE SERVICE TRIBUNAL
K.P. PESHAWAR

Haq Nawaz.....**Appellant**

Versus

DPO Battagram etc.....**Respondents**

APPEAL

APPLICATION FOR RESTRAINING THE
RESPONDENTS FROM THE RECOVERY
OF AMOUNT FROM HIS SALARY.

Respectfully Sheweth!

- 1) That, the appellant has filed an appeal before this Honourable Tribunal and this application may kindly be treated as part and parcel of the said appeal.
- 2) That, the appellant was posted as driver constable and later-on was promoted as Head Constable and he served as such from 2005 till the impugned order.
- 3) That, the appellant has carried out his duties day and night to the best satisfaction of his officers, but now after reversion to the rank of

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constable, the department is bent to make recovery from his salary.

It is, therefore, most humbly prayed and requested that the respondents may kindly be stopped from the recovery of amount from his salary till the disposal of instant appeal.

Dated 09/02/2024

Haq Nawaz
(Appellant)

Through: -


SHAD MUHAMMAD KHAN
Advocate Supreme Court of
Pakistan (Mansehra)

AFFIDAVIT

I, HAQ NAWAZ SON OF ANWAR KHURSHID, RESIDENT OF CHAPPAR GRAM, TEHSIL AND DISTRICT BATTAGRAM, FC NO. 21 DISTRICT BATTAGRAM DO HEREBY VERIFY THAT THE CONTENTS OF FORE-GOING OF FORE-GOING APPLICATION ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.


HAQ NAWAZ
(DEPONENT)


ATTESTED
Muhammad Adil
OATH COMMISSIONER
10/2/24
Advocate Mansehra

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BEFORE THE SERVICE TRIBUNAL
K.P. PESHAWAR

Haq Nawaz.....Appellant

Versus

DPO Battagram etc.....Respondents

APPEAL

AFFIDAVIT

I, HAQ NAWAZ SON OF ANWAR KHURSHID, RESIDENT OF CHAPPAR GRAM, TEHSIL AND DISTRICT BATTAGRAM, FC NO. 21 DISTRICT BATTAGRAM DO HEREBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT NO SUCH SUBJECT MATTER APPEAL HAS EVER BEEN FILED NOR PENDING NOR DECIDED. THAT THE CONTENTS OF FORE-GOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

Haq Nawaz

HAQ NAWAZ
(DEPONENT)

[Signature]
10/02/24

(10)

BEFORE THE SERVICE TRIBUNAL
K.P. PESHAWAR

Haq Nawaz.....**Appellant**

Versus

DPO Battagram etc.....**Respondents**

APPEAL

CORRECT ADDRESSES OF THE PARTIES

Respectfully Sheweth!

Correct addresses of the parties are as under: -

APPELLANT

Haq Nawaz son of Anwar Khurshid, resident of Chappar Gram, Tehsil and District Battagram, FC No. 21 District Battagram

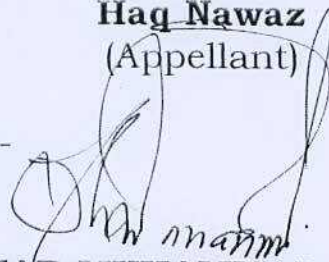
RESPONDENTS

- 1) DPO Battagram,
- 2) DIG Hazara Range Abbottabad

Dated 09/02/2024

Haq Nawaz
(Appellant)

Through: -



SHAD MUHAMMAD KHAN
Advocate Supreme Court of
Pakistan (Mansehra)

حوالہ

0301-5866695, 0336-9808320, 0997-310776

ڈرائیور خانہ حاجل سے ڈرائیور خانہ طارق
OB No - 64
20-5-05

کو فندیجہ بالابتداء تسکین ہو گیا ہے۔ 23-05-05

ڈرائیور خانہ حاجل سے ڈرائیور راشد
OB No 85
9-07-05

ڈرائیور راشد سے ڈرائیور خانہ حاجل
OB No - 64
18-05-06

ڈرائیور خانہ حاجل سے ڈرائیور خانہ بلگرام
OB No - 162
28-12-06

Chohan Book Depot: 0301-5866695, 0336-9808320, 0997-310776

Attest
Sudhakar Singh
Advocate
Peshawar Court

ANNEX B
 12

”مقامہ برائے سربراہ مسٹر حنفیہ روم
 حضرت اہل اللہ کی خدمت میں عرض کیے جائیں گے۔

آئینہ	تعمیر	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات
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سڑکیں	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات
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برقی سہولیات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات	تعمیرات
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Shah Mahmood Khan
 Advocate Supreme Court
 of Pakistan

۳۱/۱۰/۲۰۰۶

ANNEX "C"

P - (13)

16 درجہ 16 اورناجی $\frac{1}{07}$ 21 وقت 17:10 بجے - فیضان گھٹ شہر اول
 حوالہ دیوید 18 $\frac{1}{07}$ 21 وقت 00:15 بجے - حوالہ گھٹ شہر اول
 25 درجہ 25 اورناجی $\frac{1}{07}$ 22 وقت 17:30 بجے - فیضان گھٹ شہر اول
 حوالہ صوفی 37 " " " " 00:15 بجے
 7 درجہ 7 اورناجی $\frac{1}{07}$ 23 وقت 10:05 بجے - فیضان گھٹ
 حوالہ صوفی 22 " " " " 16:10 بجے
 18 درجہ 18 اورناجی $\frac{1}{07}$ 24 وقت 17:30 بجے - فیضان گھٹ شہر اول
 حوالہ صوفی 23 " " " " 00:10 بجے
 22 درجہ 22 اورناجی $\frac{1}{07}$ 27 وقت 18:10 بجے - فیضان گھٹ
 حوالہ صوفی 29 " " " " 00:10 بجے
 8 درجہ 8 اورناجی $\frac{1}{07}$ 28 وقت 11:55 بجے - فیضان گھٹ
 حوالہ صوفی 16 " " " " 17:45 بجے

A. H. H. S. I. S. I.
 Shad Mohammad Khan
 Advocate Supreme Court
 of Pakistan.

روایتی

مشرقی خان SHO 107 وقت 9:00 بجے سے جمعہ کیپٹل اسٹریٹ 271 سے باسٹو SMA لجنہ
مراٹھ گشت شینہ ونک ایل بسواری تک ایس سرگرمی یا پھول سن فورزا 21 سے روانہ
KKH صوبہ قمانہ پانول

والی

مشرقی خان SHO 107 وقت 14:00 بجے سے جمعہ صحران سے رفتہ بحوالہ صحرانہ لبراز مرنہ ایل
گشت اول صوبہ قمانہ KKH بازار پھول دیکھ رہے ہیں پل وغیرہ سے والیس یا پھول
مراٹھ سرگرمی درست حالت میں لکڑی احاطہ قمانہ کی گھن میں کھڑی کرتے صحرانہ سے اسلم
دافل مالخانہ کروانا و مہر صہریہ نرنی

Attest
Shad Mohammad Khan
Advocate Supreme Court
of Pakistan.

ANNEX "E"

ORDER

P-15

In compliance of the order of worthy P.P.O K Pakhtunkhwa, Peshawar vide notification No.21094/E-II dated 26.07.2008 Memo: No. 222-253/A-3 dated 04.01.2013.

The following lower subordinates of operational wing are posted as drivers with immediate effect:-

- 1- HC Niaz Mali No.53
- 2- Const: Jamshed Khan No.173
- 3- Const: Haq Nawaz No.21
- 4- Const: Shah Asghar No.225
- 5- Const: Israr Ahmad No. 190
- 6- Const: Akhtar Munir No.316
- 7- Const: Muhammad Tahir No.306
- 8- Fazal-ur-Reman No.288
- 9- Const: Muhammad Nawaz No.366
- 10- Const: Muhammad Ihsan No.78

District Police Office
Battagram.

No 1936-38 dt. 13-03-13

Copies submitted for favour of information to the:-

1. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
2. Regional Police Officer, Hazara Region Abbottabad.
3. Deputy Inspector General of Police, Tele Khyber Pakhtunkhwa, Peshawar.
4. OB/SRC, P/O and MTO.

OB-NO-24
13-03-013

Shad
Shad Mohammad Khar
Advocate Supreme Court
of Pakistan

M.L.
District Police Office
Battagram.

ANNEX = "F"

OFFICE OF THE DISTRICT POLICE OFFICER, BATTAGRAM.

P-16

ORDER

A departmental Promotion Board Comprising of the following officers is constituted to consider the promotion of C-I LHC, as officiating Head Constable. The departmental Promotion Board will be held on 14.10.2015, at 10:00 hours in the office of the undersigned.

- 1. Mr. Jehan Zeb Khan (PSP) District Police Officer, Battagram. (Chairman)
- 2. Mr. Syed Mukhtar Shah DSP Battagram. (Member)
- 3. Mr. Bazmir Khan DSP Circle, Allai. (Member)

~~Signature~~
District Police Officer,
Battagram.

No. 15092-93 SRC, Dated Battagram the, 12-10-2015.

Copy for information and necessary action to the:-

- 1. Dy: Superintendent of Police, Headquarters, Battagram.
- 2. Dy: Superintendent of Police, Circle, Allai.

Handwritten Urdu notes and signatures at the bottom left.

Attested by
Shah Muhammad Khan
Advocate Supreme Court
of Pakistan.

Bazmir Khan

ANNEX 2 "C",

OFFICE OF THE DISTRICT POLICE OFFICER BATTAGRAM.

ORDER.

P-17

As recommended by the Departmental Promotion Board constituted vide this office Order/Endst: No.15094-95/SRC, dated 12.10.2015, under the Chairmanship of the undersigned. Driver Constable Haq Nawaz No.21, of this district was found fit for promotion and as such he is hereby promoted to the rank of officiating Driver Head Constable in BPS-7(7490-415-19940) with immediate effect.


District Police Officer,
Battagram.

No. 15153-56 /SRC, Dated Battagram the, 19 / 10 /2015.

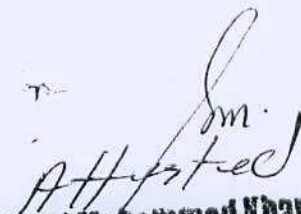
Copy for information and necessary action to the:-

1. Dy: Superintendent of Police, Headquarters, Battagram.
2. District Accounts Officer, Battagram.
3. Pay Officer/OHQ, Battagram.
4. MTO, Battagram.

Tele: Office No.0997-310036

Fax No.0997-311616.

email: batpolice@yahoo.com


Shad Mohammad Khan
Advocate Supreme Court
of Pakistan.



OFFICE OF THE DISTRICT POLICE OFFICER BATTAGRAM

Phone No. 310036/

Fax # 0997-3116


E-Mail: batpolice@yahoo.com

ANNEX "H"

P-18

ORDER

- Driver Head Constable Haq Nawaz No. 21 was recruited as Constable vide this office OB No. 152 dated 19.09.2000, absorbed as Driver FC in 2013 & promoted as Driver HC vide this office Order No. 15153-56/SRC dated 14.10.2015
- I. In this regard a committee was constituted on 12.09.2023 to consider the case of Driver Constables & Promotion to the rank of Driver Head Constables.
 - II. After threadbare discussion, the committee decided that the above named Driver Head Constable was illegally promoted without seniority and proper procedure laid down in "KPK Civil Servant, Appointment, Promotion & Transfer Rules 1989 Para-17 explanation-III (2) & (3) and Guidelines/Directives issued by worthy Regional Police Officer, Hazara region Abbottabad vide his office Memo: No. 16521/E dated 12.09.2023".
 - III. All the committee members unanimously agreed and decided that the constables absorbed as Driver Constables in year 2013 will be considered Juniors to directly recruited Driver Constables in year 2008.
 - IV. The committee members re-prepared and issued seniority list of Driver Constables & Head Constables in the light of Rules/ directions of high-ups mentioned above.
 - V. The name of Driver Head Constable Haq Nawaz No. 21 has been brought to serial No. 11 of the seniority list of Driver Constables issued vide this office Proceedings of Promotion Board Endst: No. 7594-89 dated 12.09.2023.
 - VI. Keeping in view the above circumstances, Driver Head Constable Haq Nawaz No. 21 of this district is hereby reverted/demoted to the rank of Driver Constable BPS-07 (16310-910-43610), with immediate effect.

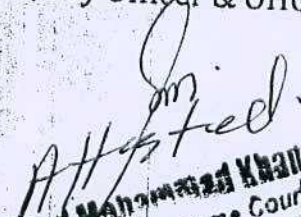

District Police Officer,
Battagram.

No. 7903-07 / dated 03-10-2023

Copy of above forwarded for information to the:

1. Regional Police Officer Hazara region Abbottabad.
2. SSP Investigation, Battagram.
3. District Accounts Officer, Battagram.
4. DSP Hqrs: Battagram.
5. SRC, Pay Officer & OHC Battagram.

OB No. 22
05-10-2023


Shad Muhammad Khan
Advocate Supreme Court
of Pakistan

3/OHC/SRC/PB

ANNEX 4

بکھنور جناب قابل احترام RPO صاحب ہزارہ ریجن ایبٹ آباد ہزارہ۔

عنوان:- اپیل برخلاف حکم نمبر 7903-7103/10/23 آرڈر بک نمبر 22 مورخہ 05/10/23 بحارہ جناب DPO صاحبہ بکھرام۔

P- (19)

جناب عالی

سائل ذیل عرض گزار ہے۔

- 1- یہ کہ من سائل کافی عرصہ محکمہ پولیس میں بھرتی ہو کر اب تک فرائض منصبی نہایت دیانت داری و خوش اسلوبی اور جان فشانی سے سرانجام دیتا آ رہا ہے سروس کے دوران سائل نے ہر گھڑی محکمہ کے وقار، عزت اور مورال کو مقدم رکھا ہے دوران ڈیوٹی کبھی بھی لاپرواہی، غفلت بے احتیاطی نہیں کی ہے اپنے افسران بالا کے حکم میں کبھی حکم عدولی نہیں کی ہے ہر لمحہ حتی الوسع کوشش رہی ہے۔ تاکہ افسران بالا کو شکایت کا موقع نہ ملے۔
- 2- یہ کہ من سائل پولیس میں مورخہ 19/09/2000 کو بحیثیت کانسٹیبل بھرتی ہوا من سائل نے حسب الحکم افسران بالا بحوالہ آرڈر نمبر 64 سال 2005 ڈرائیور تھانہ چانجل، بکھرام مورخہ 23/05/2005 کو منسوخ ہو کر آرڈر نمبر 85 مورخہ 09/07/2005 ڈرائیور تھانہ چانجل سے ڈرائیور پولیس لائن تعینات ہوا، بحوالہ آرڈر بک نمبر 64 مورخہ 18/05/2006 ڈرائیور لائن سے ڈرائیور تھانہ چانجل تعینات رہا بحوالہ آرڈر بک نمبر 162 مورخہ 28/12/2006 ڈرائیور تھانہ چانجل سے ڈرائیور تھانہ بکھرام تعیناتی ہوئی نقل آرڈر بک، نقل مدت ہمراہ لف قابل ملاحظہ ہیں۔
- 3- یہ کہ بحوالہ حکم نمبر 15153-56/ SRC محررہ 14/01/2015 مجاز اتھارٹی کی طرف سے سائل ڈرائیور ہیڈ کانسٹیبل پروموٹ ہوا ہے اور سائل کی پروموشن کے لئے منظوری ڈیپارٹمنٹل پروموشن بورڈ کی طرف سے ہوئی ہے نقل آرڈر ہمراہ لف ہے۔ جس میں کوئی غیر قانونی یا رول ریگولیشن کی خلاف ورزی نہیں پائی جاتی ہے۔
- 4- یہ کہ پروموشن کی حوالہ سے من سائل نے کسی قسم کی سفارش وغیرہ نہیں کی ہے۔ بلکہ متعلقہ کمیٹی ڈیپارٹمنٹل پروموشن بورڈ کی منظوری سے پروموشن ہوئی ہے اس حوالہ سے آرڈر نمبر 15092-93/SRC محررہ 12/10/2015 کی کاپی بطور ثبوت ہمراہ لف قابل ملاحظہ ہے۔
- 5- یہ کہ من سائل ڈرائیوروں میں سینیئر تھا MT سٹاف میں نیاز ملی بقضائے الہی وفات پانے کے بعد سائل نے خالی آسامی ASI کے واسطے پروموشن کے لئے استدعا بھی کی تھی لیکن ASI پروموٹ نہ ہو سکا۔
- 6- یہ کہ من سائل ضلع بکھرام MT سٹاف سال 2013 متعارف ہو کر سائل نے از خود کوئی درخواست نہیں کی بلکہ دفتری سٹاف نے اپنے طور پر طویل عرصہ بعد MT سٹاف میں نام درج کیا حالانکہ سائل بعد از ریٹائرمنٹ کورس پاس کرنے ضلع ہذا کے مختلف تھانہ جات پولیس لائن میں اپنے ڈیوٹی بطور ڈرائیور باحسن طریقے سے سرانجام دیتا چلا آ رہا ہے جملہ کاروائی افسران بالانے اپنی طرف سے کی ہے اس حوالہ سے آرڈر نمبر 1936-39 مورخہ 13/3/2023 مفصل ہے کاپی ہمراہ لف ہے۔

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7۔ یہ کہ مسائل کی پروموشن رولز ریگولیشن کے مطابق ہوئی متعلقہ کمیٹی کی سفارش پھر ہوئی ہے اس حوالہ سے اسٹینڈنگ آرڈر نمبر 2014/2014
مشکل ہے کاپی ہمراہ لف ہے۔

8۔ یہ کہ من مسائل نے اب تک سرکاری ڈیوٹی کو ہر گھڑی ذاتی کام پر اولین ترجیح دی ہے افسران بالا کے حکم کے بجائے آوری میں کسی قسم
کی کوتاہی نہیں کی ہے بلکہ ڈیوٹی کو بڑی دلچسپی اور خندہ پیشانی سے سرانجام دینے کی ہر ممکن کوشش کی ہے اپنے سنئیر کو ہر لمحہ قابل
احترام سمجھا ہے بلکہ جہاں بھی تعیناتی ہوئی ہے اپنے سنئیر افسران صاحبان سے اچھی کوریڈیشن رکھی ہے۔

9۔ یہ کہ مسائل کی رپورٹ میں انصاف کے تقاضے پورے نہیں کئے گئے ہیں۔ انصاف کے تقاضوں کو پورا فرمانے کی غرض سے اب
مسائل کی بطور ASI پروموشن ہونا درپیش تھی۔

10۔ یہ کہ من مسائل نہایت غریب ہے۔ اور مسائل کے 6 بچے ہیں جن کی پرورش و تعلیم کا مسائل اکیلا کفیل ہے جو ماہانہ انتہائی بمشکل
اوقات بسر ہے اس مہنگائی کے دور میں بچوں کا پیٹ پالنا نہایت مشکل ہے کیونکہ رپورٹ میں یہ مسائل کو کافی مالی نقصان ہر سطح پر اٹھانا پڑا ہے۔
لہذا استدعا ہے کہ حالات اور واقعات بالا کے پیش نظر مسائل کے حال پر رحم فرما کر، ماتحت پروری اور خداترسی کے بناء پر مسائل
کو تاریخ رپورٹ سے دوبارہ ڈرائیور ہیڈ کانسٹیبل ترقیاب فرما کر مشکور فرمائیں مسائل تاحیات دُعا گورہیگا۔

المخلف :-

مسائل :- ڈرائیور حق نواز نمبر 21 متعینہ بطور ڈرائیور INV سٹاف تھانہ بنگرام۔

Haq Nawaz

موبائل نمبر :- 0301-5726448

المرقوم :- 13/10/2023

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Advocate Supreme Court
of Pakistan



ANNEX - J, p-21

OFFICE OF THE REGIONAL POLICE OFFICER
HAZARA REGION, ABBOTTABAD

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☎ 0992-9310023

✉ r.puluzarn@gmail.com

NO: 533 /PA DATED: 22/1/2024

ORDER

This order will dispose of appeal/request submitted by Driver Constable Haq Nawaz No.21 of District Battagram against the order of reversion/demotion from the rank of Driver Head Constable to Driver constable BPS-07 vide OB No.22 dated 05-10-2023.

"Brief facts leading to the reversion/demotion are that he was recruited as constable in Police Department as constable vide OB No. 152 dated 19-09-2000 and absorbed as a Driver Constable in 2013 and illegally promoted as a driver HC vide Order No. 15153-56/SRC dated 14-10-2015. A committee was constituted in DPO Office Battagram which decided that above named Driver HC was promoted illegally without seniority and proper procedure."

Consequently, upon recommendation of the committee DPO Battagram reverted/demoted him to the rank of Driver Constable BPS-07. Hence, the official submitted this present appeal.

After receiving his appeal, comments of DPO, Battagram were sought and examined/perused. The undersigned called the appellant in OR and heard him in person. However, he failed to advance any plausible justification in his defense. Promotion of HC Driver was out of turn, therefore his demotion from the rank of Driver HC to Driver FC ordered by DPO Battagram is reasonable/genuine. Hence, the instant request submitted by the official is hereby *filed/rejected* with immediate effect.

MUHAMMAD NAZ KHAN (PSP)
Regional Police Officer
Hazara Region, Abbottabad

No. 533

/PA, dated Abbottabad the 22/1/2024.

Cc.

District Police Officer, Battagram for information and necessary action with reference to his office Memo No. 9498/Legal dated 18-12-2023. Service Roll along with Fujl Missul of the appellant is returned herewith for record.

Attested
Shah Muhammad Khan
Advocate Supreme Court
of Pakistan

