


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

**Appeal No. 500/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	03/04/2024	<p>The appeal of Mr. Nisar Muhammad presented today by Mr. Inam Ullah Nayazee Advocate. It is fixed for preliminary hearing before touring Single Bench at Bannu on 18.04.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**

Tribunal Appeal No. 590 of 2024  
*head constable police station city & anna*  
Nisar Muhammad <sup>7</sup> Son Of Syed Badshah Resident of Muslim  
Bagh Sarai Nurang District Lakki Marwat Having Cellular  
#.03339733136.

.....(APPELLANT)

VS

Inspector General of Police Khyber Pukhtunkhwa and others

.....(RESPONDENTS)

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*Nisar Muhammad*  
Appellant Nisar Muhammad

Through Counsel

*Inam Ullah Niazee*  
Inam Ullah Niazee  
Advocate high court

1

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**

Tribunal Appeal No. 500 of 2024

**Nisar Muhammad head constable Police Station city Bannu Son of Syed  
Badshah Resident of Muslim Bagh Sarai Nurang District Lakki Marwat Having  
Cellular # 0333-9733136**

..... (APPELLANT)

VS

1. Inspector General of Police Khyber Pukhtunkhwa
2. Regional Police Officer Bannu Region Khyber Pukhtunkhwa

..... (RESPONDENTS)

**APPEAL UNDER SECTION 4 OF THE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974.**

**PRAYER:**

74

(1) ON ACCEPTANCE OF INSTANT APPEAL, THIS  
HON'BLE TRIBUNAL MAY VERY GRACIOUSLY BE PLEASED.  
TO DECLARE THE D.P.C NOTIFICATION BEARING NO. 4269-  
70/EC, dated Bannu the 08/12/2023 AS ILLEGAL, AGAINST  
THE FACTS, INEFFECTIVE UPON THE RIGHTS OF APPELLANT  
AND BASED ON MALAFIDE INTENTION.

(2) THE RESPONDENT NO.2 MAY KINDLY BE DIRECTED TO PROMOTE THE APPELLANT TO THE POST OF ASI FROM THE DATE OF THE D.P.C WITH RETROSPECTIVE EFFECT AND BACK BENEFITS.

(3) ANY OTHER RELIEF, THIS HON'BLE TRIBUNAL DEEMS APPROPRIATE IN CIRCUMSTANCES OF THE CASE, MAY KINDLY BE ALSO GRANTED.

Notice: *Addresses of parties given above are correct and sufficient for the purpose of service*

Respected Sir:-

The Appellant humbly submits as under:-

1. That the appellant was appointed as a Constable on dated 3.10.2000 and have performed his duties to the entire satisfaction of the High Ups according to the law and Rules. (Copy of service card of the appellant is mark A and CNIC is mark B)
2. That the Appellant in 2002 selected for elite Course ASI and the same was passed by the Appellant.
3. That it is pertinent to mention here that the appellant was selected for lower Course in 2007 and for inter course in 2016, which was passed by the Appellant with an Honors, the Appellant was placed in D list for further promotion to the post of ASI, in the result of the said Course.

4. That the Appellant during his entire service as an IHC performed his duty with zeal and zest without any complaint, had arrested different type of offenders.
5. That the Appellant was summoned vide Memo.77 dated 7/12/2023 with the direction to appear before the DPC on dated 08/12/2023 along with other nominated employees. Therefore in the compliance of the direction the Appellant appeared before the forum of DPC, the Appellant was declared as promoted soon after DPC but later on, the name of the Appellant had been illegal and unlawfully had been expunged from notification which is against the merit and law. **(Copy of Memo is mark C, while D.P.C Notification is mark D)**
6. That on the inquiring the matter by the Appellant one or other pretext, the Authorities told to Appellant that during the pendency of the services of the Appellant along other 14 employees were awarded major punishment in Arbitrarily and same was decreased to censure by the then R.P.O Abdul Ghafoor Afridi .
7. That the members of DPC even not bother to record well and any sound reason of the deprivation of the Appellant and others which is against the principles of justice and fair play.

7/12

8. That it is astonishing that in the DPC notification **4269-70/EC, dated Bannu the 08/12/2023**, all those who were awarded punishment and then it was converted into censure e.g in the same impugned notification Mr. Mati Ullah IHC At S.NO.81 has been promoted to the post of ASI and other were also promoted to different ranks despite of the so called major punishments.

9. That the depriving of appellant from promotion is against law, illegal, discriminatory, on political ground and is based upon malafide and ill-will .

10. That appellant being dissatisfied from the impugned notification forwarded representation appeal bearing Dairy No 384/EC/21 instituted on 23/12/2023 before the learned respondent No.1 but the said appeal of the appellant is still pending for adjudication since from institution and no response uptill now has been made.(Copy of the representation appeal is mark E)

11. That as per law when the department is not heard and disposed of the appeal within three months after the institution of the appeal, the appellant is legally entitled to file an appeal before your honour.

12. That as such the appellant feeling himself aggrieved from the act of the respondent No.1 coupled with illegal, unjust and discriminatory impugned DPC

order of the respondent No.2, approaches to this honorable court on the following grounds inter alia;

**GROUND:-**

- A. That the impugned D.P.C order is unlawful, illegal, unjust, discriminatory and against the principle of natural justice and is based upon ill will and mala fide intention of the respondent No.2 and 3, is not sustainable in the eyes of law, therefore, the same may kindly be declared as null and void, void ab initio, of no legal effect and be set aside.
- B. That the impugned DPC order is against the laws, rules specially police rules 2014 and fundamental rights which are enshrined in the constitution of the Pakistan.
- C. That the impugned D.P.C Notification/Order of the Respondent No.2 is based on non-reading, misreading, erroneous interpretation and failure to exercise the jurisdiction vested in it, hence the same is liable to be canceled.
- D. That the impugned D.P.C Notification/Order fails to consider the general doctrine that in case of clash between two documents of record, the earlier shall prevail. Therefore, the order made by the respondent No.2 may kindly be considered incorrect and maybe kindly ought to be brought in line with Natural justice system.
- E. That the impugned D.P.C Notification/Order has been issued in hasty and slipshod manner without considering the rules related to promotion and, thus, the general principle of law of "justice

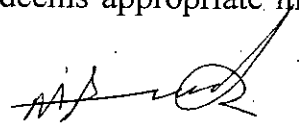
hurried is justice buried" was defeated. It is, therefore, safe to conclude that respondent No.2 has exercised its discretion perversely, improperly and with material irregularities, which leaves the order nullity in the eyes of law and liable to be set aside.

- F. That the respondent No.2 has not promoted the appellant without assigning any cogent reason, such conduct of the respondent No.2 is against the law, equity and good conscious and impugned D.P.C Notification/Order is liable to be set aside.
- G. That the appellant has been subjected to injustice and the case of the appellant has not been dealt with under the principle of fair play.
- H. That the appellant has not been provided equal treatment when there is no express exhibition against him under the law and has not been given equal protection of law, which is discriminatory and against the principle enshrined in article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- I. That the Appellant would suffer, and is continuously suffering a lot, if the impugned D.P.C Notification/Order is not set aside, and the relief sought is not awarded to the Appellant.
- J. That the learned counsel for the appellant may kindly be allowed to raise additional grounds at the time of hearing of this appeal.

Therefore, it is most humbly prayed that on acceptance of this appeal the order/notification **NO. 4269-70/EC, dated**



Bannu the 08/12/2023 issued by the respondent No.2 may kindly be declared as illegal, void ab initio, null and void, of no legal effect and be set aside and the respondents may kindly be directed to promote to the appellant to the Rank of ASI forthwith and any other relief which this honorable court deems appropriate may also be granted to the appellant.



Appellant Nisar Muhammad

Through Counsel

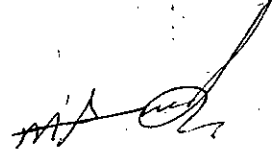


**Inam Ullah Nayazee**

Advocate High Court  
03339730951

**CERTIFICATE:**

This is to certify that no such appeal is neither pending nor filed before any other forum.



Appellant Nisar Muhammad

Through Counsel



**Inam Ullah Nayazee**

Advocate High Court  
03339730951

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**

Tribunal Appeal No. \_\_\_\_\_ of 2024

**Farid Ullah Shah** Son Of Habib Rasool Resident of Haji Fazal  
Shah Mira Khel Post Office Sarmast Mira khel Tehsil and District  
Bannu Having Cellular #.03339733136.

..... (APPELLANT)

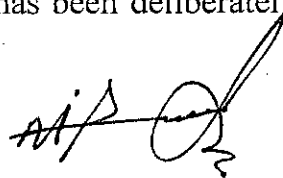
VS

Govt. of Khyber Pakhtunkhwa, through Chief Secretary Khyber  
Pakhtunkhwa Peshawar and others.

..... (RESPONDENTS)

**AFFIDAVIT:-**

I, **Nisar Muhammad** Son Of Syed badshah Resident of Muslim Bagh tehsil Sarai Nurang and District Lakki Marwat, appellant do hereby solemnly affirm and declare on oath that all the contents of this appeal are true & correct to the best of my knowledge and belief and nothing has been deliberately concealed from this Honorable Court.



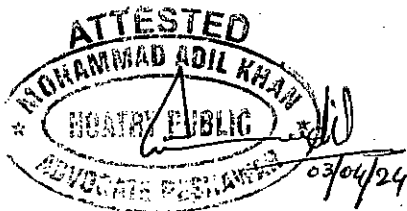
**Deponent**

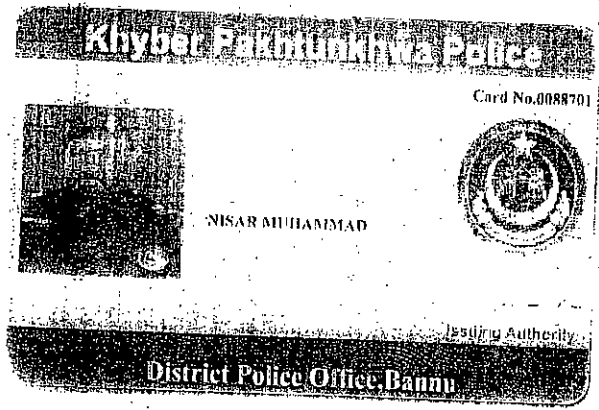
**Identified By**



**Inam Ullah Nayazee**

Advocate high court

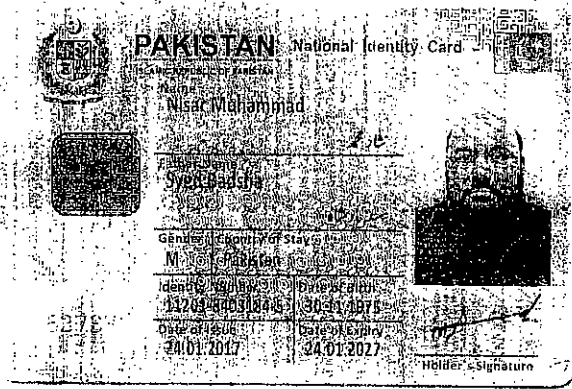




1. In the event of loss of this card, the holder should report to the nearest police station.  
 2. If it is found, please drop into the nearest police station.  
 3. Contact no. 021-4266417

Date of Issue: 30-11-1975  
 Date of Expiry: 02-09-2021  
 Emergency Contact #: 03005844790  
 Address: Bannu Bazar, Bannu, District Bannu, FATA

Attested  
 [Signature]  
 [Signature]



11201-8403184-5



11201-8403184-5

Registrar General of Pakistan

101161164196  
156-75-400470

گشده کارڈ ملے پر قومی لیڈرکس میں ڈال دیں

Attested  
*[Signature]*  
 Date

Annexure (C) 11

From: The Regional Police Officer,  
Bannu Region, Bannu

To: 1. The District Police Officers, Bannu ✓  
2. The District Police Officers, Lakki Marwat

No. 4163-64/EC. dated Bannu, Dte 29/11/2023

Subject: DPC FOR PROMOTION OF HCs ON LIST "D" AS OFFG: ASIs

Memo: A DPC meeting for promotion of the following Head Constables of Bannu Region on list "D" as Offg: ASIs will be held on Thursday 07.12.2023 at 11:00 hours in the office of the undersigned, wherein, cases of the following HCs will be considered under the relevant rules. You are hereby directed to attend the said meeting on due date & time:

S.#	Name, Rank & No.	S.#	Name, Rank & No.
1.	HC Qayyum Nawaz No. 283	24.	HC Farmanullah No.7
2.	HC Muhammad Jamal No. 481	25.	HC Sohail Akhtar No.922/24
3.	HC Mohammad Idrees No.551	26.	HC Amjad Khan No.211
4.	HC Mohammad Usman No.50	27.	HC Hamdullah Jan No.755
5.	HC Nek Jamal No.494	28.	HC Zafirullah No.1121
6.	HC Razaq Ahmed No.278	29.	HC Ghulam Qader No.193
7.	HC Hamidullah No.1283	30.	HC Hazrat Umer No.1287/306
8.	HC Shakirullah No.82/120	31.	HC Turab Shah No.239/75
9.	HC Fateh Khan No.175/23	32.	HC Barkatullah No.144
10.	HC Rasool Khan No.239	33.	HC Yousaf Khan No.721
11.	HC Muhammad Rizwan No.522	34.	HC Muhammad Yousaf No.1757/15
12.	HC Noor Muhammad No.594	35.	HC Muhammad Younis No.42
13.	HC Amir Amin No.761	36.	HC Zafarullah No.333
14.	HC Ameer Aslam No.261	37.	HC Faridullah No.222
15.	HC Jamshedullah No.793	38.	HC Tariq Ali No.403
16.	HC Muqarab Khan No.17	39.	HC Noor Aslam No.60
17.	HC Hamza Ali No.328	40.	HC Nisar Muhammad No.326
18.	HC Muhammad Yousaf No.531/80	41.	HC Shamshad Ali No.26
19.	HC Khandan No.632	42.	HC Sabihullah No.70
20.	HC Rehmatullah No.1190	43.	HC Muhammad Haya No.354
21.	HC Salim Khan No.105/254	44.	HC Shakeebullah No.1186/2
22.	HC Bahadar Munir No.524	45.	HC Farooq Khan No.1219
23.	HC Gul Sada Khan No.1313/08	46.	HC Abdul Hadi No.14/400

Attended  
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47.	HC Attiqullah Shah No.315	79.	HC Allah Nawaz Khan No.1217
48.	HC Sharifullah No.467	80.	HC Noor Aslam No.999/1378
49.	HC Zar Khan No.483	81.	HC Umer Farooq No.432
50.	HC Shahidullah No.368	82.	HC Sifat Ullah No. 408
51.	HC Aurangzeb No.18/69	83.	HC Muhammad Shoab No. 949
52.	HC Muhammad Riaz No.781	84.	HC Kifayat Ullah Khan No. 13
53.	HC Asmatullah No.107	85.	HC Hayat Ullah No. 1820
54.	HC Muhd: Ismail No.757	86.	HC Rasta Baz No. 75
55.	HC Shah Khalid No.381	87.	HC Khalil Nawaz No. 1089
56.	HC Nifatullah No.814/47	88.	HC Muhammad Esa No. 38
57.	HC Muhammad Ijaz No.179	89.	HC Muhammad Fazil Shah No. 399
58.	HC Muhammad Ibrahim No.292	90.	HC Arshad Hussain No. 601
59.	HC Binyamin No.1018	91.	HC Mati Ullah No. 94
60.	HC Sameenullah No.803	92.	HC Hashim Khan No. 177
61.	HC Liaqat Ali No.326/200	93.	HC Ashraf Zaman No.902
62.	HC Noor Dali Khan No.354/765	94.	HC Jamil Khan No.35
63.	HC Asar Ali No.506	95.	HC Muhammad Nazeef Khan No. 11
64.	HC Samiullah No.123	96.	HC Hamayun No.227
65.	HC Liaqat Ali No. 392	97.	HC Sarmad Khan No.12
66.	HC Inayat Ali Shah No.11/996	98.	HC Arzi Man No.388
67.	HC Attaullah Shah No.216/956	99.	HC Zia-ud-Din No.240
68.	HC Muhammad Arif No.952	100.	HC Mushtaq Zaman No.72
69.	HC Ghulam Muhammad No.3/831	101.	HC Noor Subhani Shah No.214
70.	HC Muhammad Naeem No.601	102.	HC Shams-ud-Din Khan No.1070
71.	HC Sajid Khan No.47	103.	HC Kifayat Ullah Khan No.408
72.	HC Shaqiaz Sikandary No.774	104.	HC Imran Khan No.114/388
73.	HC Naeem Nawaz No.21	105.	HC Abid Ullah Khan No.10
74.	HC Waris Khan No.932/10	106.	HC Muzafar Khan No. 246
75.	HC Muhammad Aslam No.343	107.	HC Shah daraz Khan, 4760
76.	HC Muhd: Tariq No.1184/22	108.	HC Mohammad Ishtiaq No. 365
77.	HC Nisar Muhammad No.88	109.	HC Masood urRehman No. 1085
78.	HC Usman Gul No.56	110.	HC Dosth Mohammad No. 4741

*Attest*  
*[Signature]*  
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79.	HC Ihsanan Ullah No. 70	111.	HC Raqibaz Khan No.822
80.	HC Zaffar Ali No. 184	112.	HC Hikmatullah No.85
111.	HC Israr Khan No. 4738/742/883	126.	HC Samiullah No.336
112.	HC Farid Ullah No. 1124	127.	HC Saudad Shah No.927
115.	HC Farooq Ahmad No. 3497/290	128.	HC Raza Khan No.1420/274
116.	HC Mohd: Maqbool Khan No. 610/1224	129.	HC Shafidullah No.1054
117.	HC Khurshid Alam No. 134	130.	HC Mishkat Ullah No.333
118.	HC Safir Ullah No. 4742	131.	HC Muhammad Masoom No.355
119.	HC Arifullah No.1090/918	132.	HC Jamal-ud-Din No.106
120.	HC Umer Niaz No.263	133.	HC Zahid Niaz Khan No.178
121.	HC Amjad Khan No.1274	134.	HC Muhammad Afsar Khan No.1743/489
122.	HC Gharib Nawaz No.710/318	135.	HC Ahmad Jan No.903
123.	HC Sikander Hayat No.4743	136.	HC Asghar Ali No.272



(OFFICE SUPDT.)  
For Regional Police Officer,  
Bannu Region, Bannu

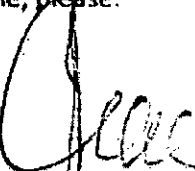
No.41165-69/EC, dated Bannu the 29/11/2023

Copies to:-

1. The District Police, Bannu
2. The District Police, Lakki Marwat
3. The SP/Investigation, Bannu
4. The SP/Investigation, Lakki Marwat
5. The SP/Investigation, North Waziristan

The above mentioned Police Officers of  
your respective Districts/Units may be  
directed to attend the said meeting on  
due date and time, please.

Attested  
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(OFFICE SUPDT.)  
For Regional Police Officer,  
Bannu Region, Bannu

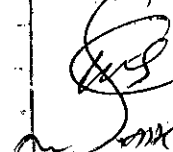
## POLICE DEPARTMENT

## BANNU REGION

## ORDER

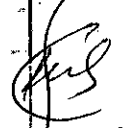
On approval of the Departmental Promotion Committee in its meeting held on 07.12.2023 in the office of the undersigned, the following confirmed IICs of Bannu Region on List "D" are hereby promoted to the rank of Officiating Assistant Sub-Inspectors under Police Rules, 13.1, 13.4 (2), 13.9(1) and Standing Order No. 10/2014.

S.#	Name, Rank & No.
1.	IIC Mohammad Idrees No.651
2.	IIC Mohammad Usman No.50/650
3.	IIC Nek Jamal No.494
4.	IIC Razaq Ahmed No.278/1695
5.	IIC Hamidullah No.1283
6.	IIC Shakirullah No.82/120
7.	IIC Fatch Khan No.184/206
8.	IIC Rasool Khan No.239/1200
9.	IIC Muhammad Rizwan No.522/532
10.	IIC Noor Muhammad No.594
11.	IIC Amir Amin No.761
12.	IIC Ameer Aslam No.261
13.	IIC Jamshedullah No.793/626
14.	IIC Muqarab Khan No.17
15.	IIC Hamza Ali No.323/165
16.	IIC Muhammad Yousaf No.531/80/1301
17.	IIC Khandan No.632/1967
18.	IIC Rehmatullah No.1190
19.	IIC Salim Khan No.105/254
20.	IIC Bahadar Munir No.524
21.	IIC Gul Sada Khan No.1313/08/1687
22.	IIC Farmanullah No.7/1109
23.	IIC Sohail Akhtar No.922/24/995
24.	IIC Amjad Khan No.211/2591
25.	IIC Hamdullah Jan No.755
26.	IIC Zafirullah No.1121
27.	IIC Ghulam Qader No.193/147
28.	IIC Hazrat Umar No.1287/306
29.	IIC Turab Shah No.239/75/1216
30.	IIC Barkatullah No.144
31.	IIC Muhammad Yousaf No.1757/15/631
32.	IIC Muhammad Younis No.42/19
33.	IIC Zafirullah No.333
34.	IIC Tariq Ali No.403/679
35.	IIC Noor Aslam No.60/242

Attested  
  
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36.	HC Nisar Muhammad No.326
37.	HC Shamsud Ali No.26
38.	HC Sabihullah No.70
39.	HC Muhammad Iqbal No.354/718
40.	HC Shakeebullah No.1186/2386
41.	HC Farooq Khan No.1219/86
42.	HC Abdul Hadi No.14/400
43.	HC Attiqullah Shah No.315/920
44.	HC Sharifullah No.467
45.	HC Zar Khan No.483/471
46.	HC Shahidullah No.568/888
47.	HC Aurangzeb No.18/69
48.	HC Muhammad Riaz No.781
49.	HC Asmatullah No.107
50.	HC Muht: Ismail No.757/2239
51.	HC Shah Khalid No.381/371
52.	HC Nifatullah No.814/47
53.	HC Muhammad Ijaz No.179/425
54.	HC Muhammad Ibrahim No.292/271
55.	HC Binyamin No.1018
56.	HC Sameenullah No.803
57.	HC Noor Dali Khan No.354/765
58.	HC Asar Ali No.506
59.	HC Samiullah No.123
60.	HC Liaqat Ali No. 392
61.	HC Inayat Ali Shah No.11/996
62.	HC Attaullah Shah No.216/956
63.	HC Muhammad Arif No.952/857
64.	HC Ghulam Muhammad No.3/831
65.	HC Muhammad Naeem No.601
66.	HC Sujid Khan No.47/01
67.	HC Shafiq/Sikandary No.774/785
68.	HC Naeem Nawaz No.21
69.	HC Waris Khan No.932/10
70.	HC Muhammad Aslam No.343
71.	HC Noor Aslam No.999/1378
72.	HC Umer Farooq No.412
73.	HC Sifat Ullah No. 408
74.	HC Muhammad Shoaib No. 949
75.	HC Kifayat Ullah Khan No. 13/82
76.	HC Hayat Ullah No. 1820
77.	HC Rasta Buz No. 75/918

Attestad  
  
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78.	IIC Khalif Nawaz No. 1089
79.	IIC Muhammad Isha No. 38
80.	IIC Muhammad Fazil Shah No. 399
81.	IIC Mati Ullah No. 320/94
82.	IIC Hashim Khan No. 177
83.	IIC Ashraf Zaman No.902
84.	IIC Jamil Khan No.35
85.	IIC Muhammad Nazeeq Khan No.11
86.	IIC Sarmad Khan No.12/214/913
87.	IIC Arzi Man No.388
88.	IIC Zia-ud-Din No.240
89.	IIC Mushtaq Zaman No.72/1835
90.	IIC Shams-ud-Din Khan No.1070
91.	IIC Kifayat Ullah Khan No.408
92.	IIC Imran Khan No.114/388
93.	IIC Muzafar Khan No. 246
94.	IIC Shah daraz Khan. 4760
95.	IIC Mohammad Ishliq No. 365/286
96.	IIC Masood urRehman No. 1085
97.	IIC Dosth Mohammad No. 4741
98.	IIC Ihsan Ullah No. 70
99.	IIC Zallar Ali No. 184
100.	IIC Israr Khan No. 4738/742/883
101.	IIC Farid Ullah No. 1124
102.	IIC Farooq Ahmad No. 3497/290
103.	IIC Mohd: Maqbool Khan No. 610/1224
104.	IIC Khurshid Alam No. 134
105.	IIC Safir Ullah No. 4742


Necessary gazette notification may be issued under intimation to all concerned.


Regional Police Officer  
Bannu Region,  
Bannu

No. 4269-70 IIC, dated Bannu the 08 /12/2023

Copies for information and necessary actions:-

1. The District Police Officers, Bannu & Lakki Marwat for issuance of gazette notification under intimation to all concerned.

  
Regional Police Officer  
Bannu Region,  
Bannu  
08/12/23

*Attested*  


عزت مآب جناب GP صاحب صوبہ خیر بخت خواہ

عنوان: درخواست دربار حصول انصاف بابت پرموشن ASI

جناب عالی!

گزارش بحضور انور ہے کہ من سائل 03-10-2000 کو محکمہ پولیس میں بطور کنسٹیبل بھرتی ہو چکا تھا جو بعد میں PTC 2007 ہنگو سے لوئر کورس امتیازی نمبرات کیساتھ پاس کر کے 2015 کو ضلع لکیمپور میں ہیڈ کنسٹیبل پرموشن ہوا تھا جو کہ 2016 کو بغرض انٹرمیڈیٹ کورس PTC ہنگو سلیکٹ ہو کر امتیازی نمبرات کیساتھ انٹرمیڈیٹ کورس PTC ہنگو سے پاس کر کے 2017 کو D لسٹ ہیڈ کنسٹیبل پرموشن ہوا بعد ہوسال 2022 میں نوشہرہ ایلیٹ کمان کورس پاس کر کے ASI کیلئے موزوں ہوا۔ اس دوران سائل نے مختلف تھانہ جات لگی مروت، ضلع بنوں، شمالی وزیرستان میں نہایت خوش اسلوبی سے ڈیوٹی سرانجام دیں چکا ہو۔ دوران ڈیوٹی ہر قسم کی جرائم کی روک تھام کیلئے حد قول اسے کوشش کی ہے اور ہر جگہ نمایاں کارروائی برخلاف مجرمان اشتہاری کی ہے جو کہ ہر ایک تھانہ میں ریکارڈ موجود ہے۔ حالیہ DPC جو کہ ASI پرموشن کیلئے جناب RPO صاحب بنوں نے مورخہ 07-19-2023 کو مقرر کی جس میں من سائل سلسلہ نمبر 77 جاری شدہ فہرست ہائے موجود ہے مورخہ 08-19-2023 کو جب پرموشن شدہ ASIs کی فہرست دستخط شدہ جناب RPO صاحب جاری ہوا جس میں من سائل کو Ignore یعنی نظر انداز/ایگزیکٹ کیا گیا ہے جس کے بابت پتہ براری سے معلوم ہوا کہ مجھے کچھ سال پہلے Major punishment دیا گیا تھا جو کہ بعد انکو انیری جناب DIG عبدالغفور آفریدی صاحب نے مورخہ 10-08-2020 کو مروت پر دوبارہ بحال کر کے Major punishment ختم کیا گیا جس کی فونوں کاپی ہمراہ لف درخواست ہے۔ من سائل کیساتھ اسی سلسلہ میں جو کہ بے بنیاد الزامات لگائے گئے تھے میں 15 کسان عہدہ دوران، کنسٹیبلان کو سزا ملی تھی جس کو سابقہ DIG عبدالغفور خان آفریدی نے انکو انیری کر کے بے بنیاد الزامات سے بری الزام قرار دے کر سب سزا کو ختم کیا گیا ہے۔ جس کی آرڈر فونوں کاپی ہمراہ لف درخواست ہے۔ آرڈر کے سلسلہ نمبر 1 پر ASI آختوجان خان ہے جو کہ حال ہی میں سب انسپلر پرموشن ہوا ہے۔ اسی طرح سلسلہ نمبر 11 پر HC مطلع اللہ بھی موجود ہے جو کہ حال ہی DPC مورخہ 07-19-2023 میں ASI پرموشن ہوا ہے میری انجناب سے گزارش ہے کہ مجھے بالا کسان کے ترقی یاب ہونے پر کوئی گلہ شکوہ نہیں ہے اور نہیں میرا کوئی اعتراض ہے لیکن مجھے بھی اپنا حق دیا جائے اور من سائل کیساتھ جاہر انا اور ظالمانہ سلوک کو روک کر کے اپنا حق دیا جائے۔ اسی طرح اسی DPC میں

Attested



بہت سارے ہیڈ کانسٹیبلان جو کے میجر مزایافتہ ہیں اور بعد میں ان کی بھی سزائیں معاف ہو چکی ہے لہذا من  
سائل کو نا کردہ گناہ کی سزا دی جائے من سائل کو کسی کے ترقی یا پ ہونے پر کوئی آفر دگی نہیں اور نہ ہی اعتراض  
کا حامل ہوں بلکہ اپنا حق مانگتا چاہتا ہوں من سائل نے DPC میں ٹانگ اور پر موشن آرڈر بجا یہ RPO صاحب  
بنوں کی کاپی کیلئے درخواست دی ہے جو کہ سائل کا بنیادی حق ہے لیکن مجھے کسی قسم کی دستاویز فراہم نہیں کی گئی تاہم  
متعلقہ سٹاف میں زبانی بتایا ہے کہ سائل کو میجر سزا جو کہ اپیل پر کالعدم قرار دی گئی تھی اس بنیاد پر سائل کو ڈیفرفر کیا گیا  
ہے جو کہ قانوناً کسی محفل سزا پر کسی اہلکار کو ڈیفرفر نہیں کیا جاسکتا ہے۔

لہذا آپ صاحبان سے بذریعہ درخواست معروض ہو کہ من سائل کو بھی ASI پر دموت کرنے کا حکم  
صادر فرما کر مشکور فرمایا جائے۔ سائل تا حیات آپ کو اور آپ کے اہل و عیال کیلئے دعاگوں رہے گا۔

نوٹ: من سائل نے جناب RPO صاحب بنوں کو رقم درخواست بھی دی ہے جس کی فوٹو کاپی  
ہمراہ لفافہ درخواست ہے۔

عین نوازش ہوگی

23-12-2023

مورخہ:

العارض

سائل آپ کا تابعہ اور فارم نمبر 1789/88/IHC حال پولیس لائن بنوں۔

AA

Attested

AS  
AHC

# وکالت نامہ

S No 16444

GENERAL SECRETARY  
DISTRICT BAR ASSOCIATION  
RAJOURI

بعدالت جناب سردس کی پینل سپرٹنڈنٹ خواہ لٹرار

Appellant ۲۰۲۶ جناب

مورخہ

IGP KPK بنام نثار محمد

Appeal

مقدمہ

جرم

تھانہ

## باعث تحریر آئندہ

مقدمہ مندرجہ بالا عنوان سہالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ ان مقام بنوں کیلئے  
**انعام (المرکز منازعہ) رول نمبر ۱۰۱** 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 تقرر ثالث و فیصلہ پر حلف دینے جو اب دہی اور اقبال دعویٰ اور بصورت  
 ڈگری کرانے اجراء اور وصولی چیک، روپیہ اور عرضی اور درخواست ہر قسم کی تصدیق زرا اس پر دستخط کرنے کا اختیار ہوگا۔ نیز  
 بصورت ڈگری کرانے اجراء اور وصولی چیک، روپیہ اور عرضی اور درخواست ہر قسم کی تصدیق زرا اس پر دستخط کرنے کا اختیار ہو  
 گا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرفہ یا اپیل کی برآمدگی اور منسوخی دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے  
 کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے کسی اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا  
 کوئی اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور بالا اختیارات حاصل ہوں گے اور اس کا ساختہ  
 و پرداختہ بھی منظور قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل  
 صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہوا پیشین  
 سے باہر تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مقدمہ مذکور کریں۔ نیز اگر بھی وجہ مثلاً بیماری، معذوری، علالت وغیرہ  
 کی وجہ سے عارضی یا مستقبل پیروی مقدمہ نہ کر سکیں تو بھی وکیل صاحب یا اس کے لواحقین کو بقایا فیس (اگر کوئی ہے) ادا  
 کرنے کا کے پابند ہونگے اور ادا شدہ فیس کی واپسی کا تقاضہ کرنے کا حق نہیں ہوگا۔ مضمون وکالت نامہ سن اور سمجھ کر وکالت

نامہ لکھ دیا تاکہ سند رہے۔

*(Handwritten signatures and notes)*  
 Ave

۲۰۲۶

ماہ

المرقوم

العبد

گواہ شدہ

العبد

*(Handwritten signature)*

نثار محمد ولد سرد بادشاہ سکندہ مسلم باغ سہالا ٹونڈ ضلع ملکی صورت