


# FORM OF ORDER SHEET

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

**Appeal No. 581/2024**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/04/2024	<p>The appeal of Mr. Noor Subhani Shah presented today by Mr. Inam Ullah Nayazee Advocate. It is fixed for preliminary hearing before touring Single Bench at Bannu on Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p><b>REGISTRAR</b></p>

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

Tribunal appeal No. 581 of 2024

**Noor Subhani Shah head constable police station Saddar**

**Lakki S/O jumma Khan Resident of Dari Wazir Abad Ghuriwala**

**District Bannu Having Cellular. # 0336-9625108.**

..... (APPELLANT)

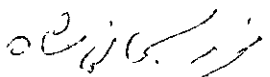
VS

**Inspector General of Police Khyber Pukhtunkhwa and others**

..... (RESPONDENTS)

**I N D E X**

S.No.	Description of Documents	Annexure	Page Number
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Appellant Noor Subhani Shah

Through Counsel

  
**Inam Ullah Nayazee**  
Advocate high court

1

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

Tribunal appeal No. 581 of 2024

Noor Subhani Shah head constable police station Saddar  
Lakki S/O Jumma Khan Resident of Dari Wazir Abad Ghuriwala  
District Bannu Having Cellular. # 0336-9625108.

..... (APPELLANT)

VS

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

.....(RESPONDENTS)

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

**PRAYER:**

(1) ON ACCEPTANCE OF INSTANT APPEAL,  
THIS HON'BLE TRIBUNAL MAY VERY GRACIOUSLY BE  
PLEASED. TO DECLARE THE D.P.C ORDER  
/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 20.03.1994 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 2022 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 2008 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.

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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.101 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/ D.P.C is mark C, while Order/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.

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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 mala fide and ill-will.
10. That appellant being dissatisfied from the impugned notification forwarded representation appeal bearing Dairy No. <sup>74</sup>417/EC 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;

**FOUNDATIONS:-**

- 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, 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

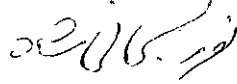
hurried is justice buried” was defeated. It is, therefore, safe to conclude that respondent No.2 has exercised its discretion perversely, improperly and with material irregularities, which leaves the order nullity in the eyes of law and liable to be set aside.

- 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 Noor Subhani Shah

Through Counsel



**Inam Ullah Nayazee**

Advocate High Court  
03339730951

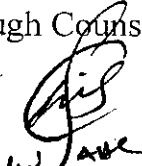
**CERTIFICATE:**

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



Appellant Noor Subhani Shah

Through Counsel



**Inam Ullah Nayazee**

Advocate High Court  
03339730951

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

Tribunal appeal No. \_\_\_\_\_ of 2024

**Noor Subhani Shah head constable police station Saddar**

**Lakki S/O Jumma Khan Resident of Dari Wazir Abad Ghuriwala**

District Bannu Having Cellular. # 0336-9625108.

..... (APPELLANT)

vs

7/1

*Inspector General of Police* Khyber

Pakhtunkhwa Peshawar and others.

..... (RESPONDENTS)

**AFFIDAVIT:-**

I, **Noor Subhani Shah head constable police station Saddar Lakki S/O jumma Khan Resident of Dari Wazir Abad Ghuriwala District Bannu Having Cellular. # 0336-9625108.** 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**

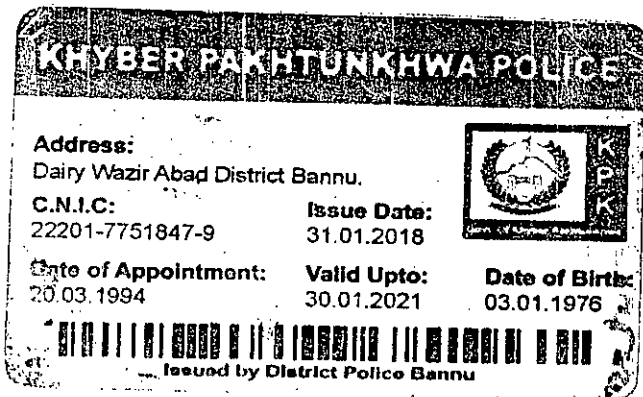
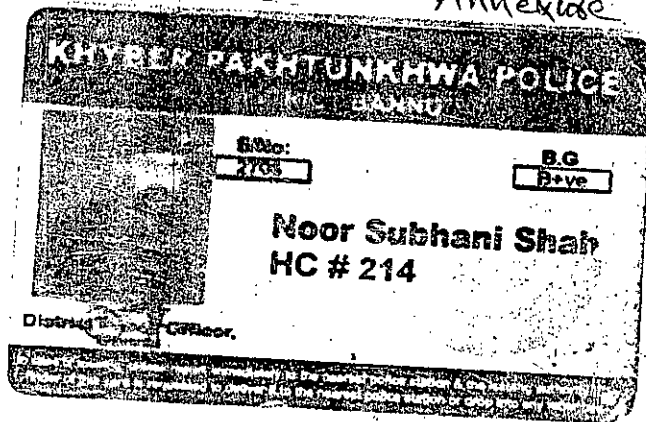
**Identified By**

*Inam Ullah Navazee*  
**Inam Ullah Navazee**

Advocate high court



Annexure (A) (9)





PAKISTAN National Identity Card



Name  
Noor Subhani Shah



Father Name  
Juma Khan

نور سبحانی شاہ

جمہ خان

Gender : Country of Stay  
M Pakistan

Identity Number : Date of Birth  
22201-7751847-9 : 03.01.1976

Date of Issue : Date of Expiry  
30.01.2024 : 30.01.2034

Holder's Signature

Annexure (B) (10)

22201-7751847-9  
تعمیراتی وزیر آباد، ڈاک خانہ، غوری والا، تحصیل و ضلع جوں

508651171132  
161-94-518532

Registrar General of Pakistan

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گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

From: The Regional Police Officer,  
Bannu Region, Bannu

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

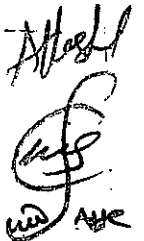
No. 4163-64/EC, dated Bannu, the 29/11/2023

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.922/74
3.	HC Mohammad Idrees No.651	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 Fatch 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.105/234	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

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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 Shoaib 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. 309
58.	HC Muhammad Ibrahim No.292	90.	HC Arshad Hussain No. 604
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 Kharl No.408
72.	HC Shafiqaz 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 Mhammad 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

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79.	HC Ihsanan Ullah No. 70	1.1.	HC Raqibaz Khan No.822
80.	HC Zaffar Ali No. 184	1.2.	HC Hikmatullah No.85
111.	HC Israr Khan No. 4738/742/883	1.6.	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. 510/1224	129.	HC Shafidullah No.1084
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

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

No.1165-69/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. }

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

## POLICE DEPARTMENT

Annexure (D)  
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 Officer-in-Charge Assistant Sub-Inspectors under Police Rules, 13.1, 13.4 (2), 13.9(1) and Standing Order No. 16/2014.

S.#	Name, Rank & No.
1.	IIC Mohammad Idrees No.651
2.	IIC Mohammad Usman No.50/650
3.	IIC Nek Jamal No.894
4.	IIC Razaq Ahmed No.278/1695
5.	IIC Hamidullah No.1283
6.	IIC Shaktullah No.82/120
7.	IIC Fatch Khan No.184/206
8.	IIC Rasool Khan No.239/1200
9.	IIC Mohammad 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.528/165
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 Anjad 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 Imer 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 Zafarullah No.333
34.	IIC Tariq Ali No.403/679
35.	IIC Noor Aslam No.60/242

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36.	IIC Nisar Muhammad No. 126
37.	IIC Shamsah Ali No. 26
38.	IIC Sabilullah No. 70
39.	IIC Muhammad Haya No. 354/718
40.	IIC Shakeebullah No. 1186/2/386
41.	IIC Farooq Khan No. 1219/86
42.	IIC Abdul Hadi No. 14/400
43.	IIC Atiqullah Shah No. 313/920
44.	IIC Sharfullah No. 467
45.	IIC Zar Khan No. 413/471
46.	IIC Shahidullah No. 368/808
47.	IIC Aurangzeb No. 18/69
48.	IIC Muhammad Ridz No. 781
49.	IIC Asmatullah No. 107
50.	IIC Muhd: Ismail No. 757/2239
51.	IIC Shah Khalid No. 381/211
52.	IIC Nifatullah No. 814/47
53.	IIC Muhammad Ijaz No. 179/425
54.	IIC Muhammad Ibrahim No. 292/271
55.	IIC Binyamin No. 1018
56.	IIC Samecnullah No. 803
57.	IIC Noor Dali Khan No. 354/765
58.	IIC Asar Ali No. 506
59.	IIC Samiullah No. 123
60.	IIC Ishaq Ali No. 392
61.	IIC Inayat Ali Shah No. 11/996
62.	IIC Attaullah Shah No. 216/956
63.	IIC Muhammad Arif No. 932/857
64.	IIC Ghulam Muhammad No. 3/831
65.	IIC Muhammad Nazem No. 601
66.	IIC Sajid Khan No. 47/01
67.	IIC Shauqat Sikandary No. 774/785
68.	IIC Naeem Nawaz No. 21
69.	IIC Waris Khan No. 932/10
70.	IIC Muhammad Aslam No. 343
71.	IIC Noor Aslam No. 999/1378
72.	IIC Umer Farooq No. 432
73.	IIC Sifat Ullah No. 408
74.	IIC Muhammad Shoab No. 949
75.	IIC Kifayat Ullah Khan No. 13/82
76.	IIC Hayat Ullah No. 1820
77.	IIC Rasta Buz No. 75/910

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78.	IIC Khalil Nawaz No. 1089
79.	IIC Muhammad Ishaq No. 38
80.	IIC Muhammad Fazil Shah No. 399
✓ 81.	IIC Mati Ullah No. 320/94
82.	IIC Inshim Khan No. 177
83.	IIC Ashraf Zaman No. 902
84.	IIC Jamil Khan No. 35
85.	IIC Muhammad Nazeem Khan No. 11
86.	IIC Saimad Khan No. 12/21/1913
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 Ishlaq No. 365/286
96.	IIC Masood ur Rehman No. 1085
97.	IIC Dosth Mohammad No. 4741
98.	IIC Ihsan Ullah No. 70
99.	IIC Zaftar 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 N.C., dated Bannu the 08/12/2023

Copies for information and necessary intimation:-

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

عزت مآب جناب IGP صاحب، سوہانگیر، کھنڈ، ننکانہ

عنوان: درخواست دربار حصول انصاف بابت، پر مشن ASI

جناب عالی!

گزارش بحضور انور ہے کہ من سال 1994 کو پولیس میں بطور کنسٹیبل بھرتی ہوا تھا جو کہ من سال 2008 میں PTC ہنگو سے لوئیر کورس پاس کر کے 2016 میں ہیڈ کنسٹیبل پر دموت ہو کر اسی سال PTC ہنگو سے انٹرمیڈیٹ کورس امتیازی نمبرات کیساتھ پاس کر کے 2017 میں D لسٹ ہیڈ کنسٹیبل پر دموت ہوا تھا۔ 2022 میں ایلٹ کمان کورس نوشہرہ EPTC سے پاس کر چکا ہوں۔ من سال ASI پر مشن کیلئے بالکل موزوں تھا اور حال ہی DPC میں لسٹ بابت ASI پر مشن کے سلسلہ نمبر 101 پر موجود تھا چونکہ مورخہ 07-12-2023 کو DPC مقرر کی گئی جاری شدہ فہرست ہائے بابت ترقی یا ب ASI کی فہرست میں من سال کا کوئی نام نہ تھا بعد میں معلوم ہوا کہ مجھے بوجہ میجر سزا پر DPC میں نظر انداز کیا گیا ہے چونکہ 2014 میں آپریشن ضرب عضب میں کافی متاثرین شمالی وزیرستان سے ہجرت کر کے ملک کے مختلف ضلعوں میں قیام پذیر تھے اسی آپریشن کے دوران من سال کے گاؤں کچھ متاثرین ہمراہ بال بچوں NCP گاڑیوں میں جس کی باقاعدہ رجسٹریشن آرمی آفسران نے دی تھی ان کی گاڑیاں میرے خیرے پر کھڑی تھی چونکہ میں نے ان کو رہائش وغیرہ بھی مہیاں کیا ہوا تھا اس دوران پولیس کو کسی نے غلط انفارمیشن دیکر من IHC کے خیرے پر چھاپہ مار کر پانچ عدد گاڑیاں آرمی کیساتھ رجسٹر شدہ برآمد کر کے مقامی پولیس نے میرے خلاف مقدمہ درج رجسٹر کیا جو کہ اُس وقت کے DPO جناب گل افضل خان نے مجھے بغیر انکوائری کئے ہوئے درخواست کیا بعد میں گاڑیوں کے مالکان نے بابت گاڑیاں عدالت سے رجوع کر کے گاڑیاں عدالت نے اصل مالکان کے حوالے کیئے اور مجھے بے گناہ قرار دیں کہ مقدمہ کو ڈسچارج کیا گیا اور مجھے اپنے آفسران پالانے بعد انکوائری باعزت طور پر بری ہونے کے بعد سروس پر بحال کر کے میری میجر سزا کو ختم کر دیا گیا۔ اسی طرح سابقہ DIG سجاد علی صاحب نے مجھے بے بنیاد الزامات پر سروس سے برخاست کرنے کے احکامات جاری کئے تھے لیکن جب انکوائری عمل میں لائی گئی تو مجھے ڈیپارٹمنٹل انکوائری میں انکوائری آفسر نے مجھے بے گناہ، بے قصور قرار دے کر جس پر RPO سجاد علی صاحب نے دوبارہ سروس پر بحال کر کے میری سزا ختم کر دی گئی۔ اسی طرح اُس کے بعد میں نے مختلف تھانہ جات میں نہایت خوش آسلوبی ایمانداری کیساتھ ڈیوٹی سرانجام دیتا رہا ہوں چونکہ حالیہ DPC میں مجھے بوجہ میجر سزا نظر انداز کیا گیا ہے میں کسی پر بھی کوئی اعتراض یا کوئی شک و شبہ بابت ترقی یا ب نہیں

سجاد علی صاحب  
DPO  
ARC

رہنا چاہتا ہوں لیکن میری بھی سزائیں معاف ہو چکی ہے ناکرہ گناہ کی سزا نہ دی جاوے اور مجھے بھی اور ASIs پر موٹ ہونے والے ہماریاں کیساتھ اپنی سلسلہ پر پروٹوٹ کرنے کے احکامات جاری کئے جائے۔ میری طرح گزشتہ DPC میں برائے ASIs میں بہت سے ہیڈ کانسٹیبلان کی سزائیں موجود ہے جس کی سزائیں ختم ہوئی ہے اسی طرح میری بھی سزائیں ختم ہوئی ہے۔ من سائل نے DPC میٹنگ اور پرموشن آرڈر مجازیہ RPO صاحب ہوں 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 ڈیفیر کیا گیا ہے جو کہ قانوناً کسی معطل سزا پر کسی اہلکار کو ڈیفیر نہیں کیا جاسکتا ہے۔

لہذا استدعا ہے کہ میرے ہماریاں کے ترقی یاب ہونے کے ساتھ مجھے بھی اپنے سلسلہ وار نمبر 101 ترقی یاب ہونے کے احکامات جاری فرمایاں جائے اور میرے ساتھ ظالمانہ، غیر منصفانہ رویہ کو رد کیا جائے۔ سائل تاحیات دعا گوں رہے گا۔

عین نوازش ہوگی

مورخہ: 23-12-2023

العارض

نور سجانی شاہ نمبر 214/IHC متعینہ تھانہ صدر ضلع کئی مروت۔  
نور سجانی شاہ

نور سجانی شاہ  
214/IHC  
نور سجانی شاہ

وکالت نامہ

بعدالت جناب سر دس سر بریل ضیاء الحق صاحب

2024ء منجانب

مورخہ:

مقدمہ

جرم

تھانہ

نور سبانی شاہ وکیل صاحب

رسل

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ ان مقام بنوں کے لئے انعام اللہ نیازی ایڈووکیٹ ہائی کورٹ مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کر مقدمہ کی کل کاروائی کا کامل اختیار ہو گا نیز وکیل صاحب کو راضی نامہ تقریر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء اور وصولی چیک، روپیہ، عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زر اس پر دستخط کرنے کا اختیار ہو گا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہو گا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ یا کوئی اپنے بجائے تقریر کا اختیار ہو گا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہو گا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہو گا۔ اس کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہو گا۔ اگر کوئی تارخ پیشی مقام دورہ پر ہو یا سٹیشن سے باہر تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مقدمہ مذکور کریں۔ نیز اگر اور وجہ مثلاً بیماری، معذوری، یا عیال و غیرہ کی وجہ سے عارضی یا مستقل پیروی مقدمہ نہ کر سکے تو بھی وکیل صاحب یا اسکے لواحقین کو بقایا فیس (اگر کوئی ہے) ادا کرنے کا/کے پابند ہونگے اور ادا شدہ فیس کی واپسی کا تقاضا کرنے حق نہیں ہو گا۔ مضمون وکالت نامہ سن اور سمجھ کر وکالت نامہ لکھ دیا تاکہ سدا ہے۔

ATTESTED & ACCEPTED

المرقوم ماہ ابریل 2024ء

العبد گواہ شد العبد

Handwritten signature and stamp of Inam Ullah

0333-9730951

INAM ULLAH Advocate bc-12-3968 Date of issue: July 2022 Valid upto: July 2025



ADVOCATE HIGH COURT

نور سبانی شاہ وکیل صاحب ہمبر کانسٹیبل پریس سٹیٹن صدر کل مرور سکینہ ڈراما ڈراما نور سبانی شاہ وکیل صاحب

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