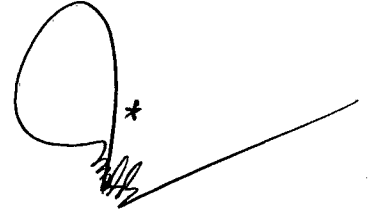


Mr. Saifullah Mohmand, Advocate for the appellant present.

Learned counsel for the appellant contended that the appellant is aggrieved of the impugned order dated 10.01.2020 whereby major penalty of dismissal from service was imposed on the appellant. His departmental appeal was rejected vide appellate order dated 30.04.2020. His revision petition filed under Rule 11-A of the Khyber Pakhtunkhwa Police Rules, 1975 was also rejected on 12.10.2020. The service appeal submitted on 29.04.2022 is obviously hit by the period of limitation enunciated in Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. The only reason for delay given in the application for condonation is that order on his revision petition passed on 12.10.2020, was communicated to the appellant on 21.03.2022 but could not produce any evidence in support, to this effect. It would be appropriate to issue pre-admission notice to the respondents for submission of reply/comments. Adjourned. To come up for reply/comments as well as preliminary hearing on 19.10.2022.



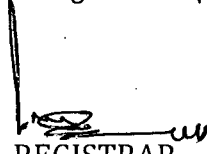


(Mian Muhammad)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 662/2022 _____

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/04/2022	<p>The appeal of Syed Taimur Ali Shah presented today by Mr. Saifullah Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	17/5/22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>13/5/22</u>. Notices be issued to appellat and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
	13.05 2022	<p>Learned counsel for the appellat present and requested for adjournment in order to further prepare the brief. Adjourned. To come up for arguments before the S.B 18.07.2022.</p> <p style="text-align: right;"> (Kalim Arshad Khan) Chairman</p>

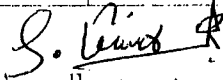
BEFORE THE SERVICE TRIBUNAL, K.P.K.
PESHAWAR.

Service Appeal No 662/2022

Syed Taimur Ali Shah VERSUS I.G. Police & others

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service appeal		1-5
2.	Affidavit		6
3.	Application for condonation of delay along-with affidavit		7-8-8A
4.	Copy of Medical Prescription	"A"	9
5.	Copy of Final Show cause Notice	"B"	10
6.	Copy of Impugned order number OB-122 dated 09.01.2020	"C"	11
7.	Copy of Departmental appeal & Impugned order No.426-33 dated 30.04.2020	"D" & "E"	12-13
8.	Copy of Revision Petition & order No.3962-70/20 dated 12.10.2020	"F" & "G"	14-16
9.	Copy of Service book	"H"	17-24
10.	Copy of DD dated 11.11.2019	"I"	25
11.	Wakalat Nama		26


Appellant

Through

SAIF ULLAH MOHAMMAD
Advocate, Peshawar.

201, 1st floor, Al-Mumtaz Hotel,
near Moalvi Jee Hospital,
Hashtnagri, Peshawar.

Cell No. 0321-9117280

Dated: -04-2022

Office

1

BEFORE THE CHAIRMAN SERVICE TRIBUNAL,
K.P.K, PESHAWAR.

Service Appeal No _____/2022

Syed Taimur Ali Shah Ex-Constable bearing Belt No.1743,
Police Department, Peshawar

.....Appellant

V E R S U S

1. Inspector General of Police KPK Peshawar.
2. Capital City Police Officer, Peshawar.
3. Superintendent of Police, Cantt, Peshawar.

.....Respondents

=====

*Service appeal under Section-4 of the Khyber
Pakhtunkhwa Service Tribunal Act, 1974 against the
impugned Orders No. Ob-122 Dated 9.1.2020, passed
by Respondent No.03, against the Order No.426-
33/PA dated 30.04.2020, passed by Respondent
No.02 as well as against the Order No.3961/20 dated
12.10.2020 passed by Respondent No.01*

=====

PRAYER-IN-APPEAL:-

On acceptance of instant appeal, the
impugned orders dated 10.01.2020 & dated
30.04.2020 as well as impugned order
dated 12.10.2020 may kindly be set aside
and the appellant may graciously be re-

instated into services, with all back benefits.

=====
Respectfully Sheweth:-

1. That the appellant was appointed in police department in the year 2015 and was lastly posted as constable at Police Station Tehkal, Peshawar under belt No.1743
2. That the meet a life threatening accident on dated 25.03.2019, in which the appellant suffered a Clavicle Fracture (fracture Collarbone), due to which the appellant unintentionally remained absent from duties w.e.f 25.03.2019 to 04.11.2019 (total of 224) days. (Copy of medical record is attached herewith as *Annexure "A"*).
3. That consequently departmental proceedings were initiated against the appellant and enquiry was entrusted to SDPO, who without observing legal formalities, proper inquiry and without issuing any preliminary show-cause notice to the appellant conducted Enquiry in his absence, however final show cause notice was issued to the appellant, which was properly replied by him and also informed him about his incapability to attend the duties. (Copy of Show cause notice is attached herewith as *Annexure "B"*).
4. That on the recommendation of the Enquiry Officer, respondent No.03 i.e. Superintendent Of Police, Cantt, Peshawar issued the impugned order No. OB-122 dated 09.1.2020 released on dated 10.01.2020, whereby the appellant was awarded major punishment of dismissal from service. (Copy of impugned Order No.OB-122 dated 09.01.2020 is attached herewith as *Annexure "C"*).

5. That the feeling aggrieved from the above-mentioned impugned order, the appellant filed his department appeal before the competent authority, which was rejected vide impugned order No.426-33 dated 30.04.2020. (Copies of departmental appeal and impugned order No.426-33 dated 30.04.2020 is attached herewith as **Annexure "D" & "E"** respectively).
6. That being aggrieved from the above mentioned both the impugned orders, the appellant filed Revision Petition Under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 before the Respondent No.01 i.e. Inspector General of Police Khyber Pakhtukhwa, which was rejected vide order No.3962-70/20 dated 12.10.2020, which was communicated to the appellant on dated 21.03.2022. (Copies of Revision Petition under Rule 11-A & order No.3962-70/20 dated 12.10.2020 are attached herewith as **Annexure "F" & "G"** respectively).
7. That being extremely aggrieved from the above-mentioned impugned orders the appellant having no other efficacious remedy available to him, but to approach this Hon'ble Tribunal, on the following grounds inter-alia.

GROUND S:

- A. That the impugned orders dated 09.01.2020 and 30.04.2020 as well as dated 12.10.2020 are illegal, unlawful against the relevant law and also against the principles of natural justice, hence untenable and liable to be set aside.
- B. That the absence of appellant w.e.f 25.03.2019 till 04.11.2019 was not deliberate rather the same was due to

4

the above-mentioned accident wherein he suffered severe Clavicle fracture (fracture of collarbone) which can be examined even with naked eyes.

- C. That the appellant time and again informed the department about his illness and requested for grant of official leave through telephone but no positive response was given by the department.
- D. That the appellant joined the police department in the year 2015, hence he has rendered more than seven years of service in the department with unblemished and spotless record. (Copy of service book is attached herewith as *Annexure "H"*).
- E. That the appellant has served the department up to the entire satisfaction of his superior officers and there is not even a single complaint against him in his entire service career.
- F. That the appellant joined the duty during this period which is evident from the Naqal Mad of the Police Station Tehkal daily Diary No.11.11.2019. (Copy of the DD dated 11.11.2019 is attached herewith as *Annexure "I"* respectively).
- G. That the inquiry officer carried out inquiry proceedings in a slipshod manner and in utter disregard of police rules and service rules as neither any showcase notice was not issued to the appellant nor any opportunity of personal hearing was given to him during the Enquiry rather appellant was condemned unheard during the entire episode.

5

- H. That in the light of superior courts judgements in case of imposing major penalty, proper enquiry should be conducted and proper opportunity of personal hearing and defense should be awarded to the civil servant.
- I. That no advertisement was issued through any local newspaper nor any summon was served on the appellant through local police station which shows that the inquiry officer carried out the entire proceeding in a slipshod manner.
- J. That the appellant craves permission of this honorable Tribunal to advance any other ground at the time of hearing and to submit any other arguments/documents if necessary, in support of this service appeal.

It is, therefore, most humbly prayed that on acceptance of this service appeal, the impugned order dated 09.01.2020, 30.04.2020 & dated 12.10.2020 may kindly be set aside and the appellant may graciously be reinstated to his services, with all back benefits

Any other relief, with this Honourable Tribunal deemed just and proper may also be granted to the appellant not specifically prayed for herein.

Appellant

Through

Dated: - .04.2022

Saif Ullah Mohmand
Advocates, Peshawar.

CERTIFICATE:

Certified that as per information no such like appeal has earlier been filed on the subject matter before this Tribunal.

ADVOCATE

6

BEFORE THE CHAIRMAN SERVICE TRIBUNAL,
K.P.K, PESHAWAR.

Service Appeal No _____/2020

Syed Taimur Ali Shah

VERSUS

Inspector General of Police & others

AFFIDAVIT

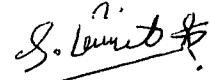
I, Syed Taimur Ali Shah Ex-Constable No.1743,
Peshawar, do hereby solemnly affirm and declare on Oath
that the contents of the instant appeal are true and correct
to the best of my knowledge and belief and nothing has
been concealed from this hon'ble court.

Identified by

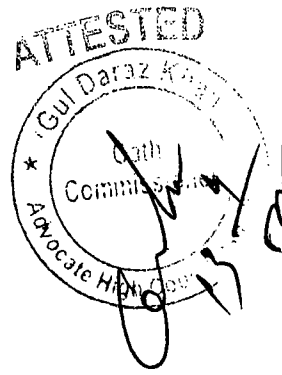


Saif Ullah Mohmand

Advocate, Peshawar High Court.



Deponent



7

BEFORE THE CHAIRMAN SERVICE TRIBUNAL, K.P.K,
PESHAWAR.

Service Appeal No _____/2022

Syed Taimur Ali Shah VERSUS I.G.P & others

=====

**APPLICATION FOR CONDONATION OF DELAY IN
FILING THE INSTANT APPEAL**

=====

Respectfully Sheweth:-

1. That the captioned appeal is being filed before this worthy Tribunal in which no date has yet been fixed.
2. That there is delay in filing instant appeal before this August Tribunal on the part of appellant, hence the instant application on the following grounds inter-alia.

GROUND:-

- A. That the respondent issued the impugned order over the Revision Petition under Rule 11-A of KP Police Rules, 1975, on date 12.10.2020 which was communicated to the appellant on dated 21.03.2022, hence straightaway the accompanying appeal is filed.
- B. That the main appeal carries great value and importance for the appellant/ applicant and if the period of limitation is not condoned, he will suffer irreparable loss.
- C. That the appellant has good prime effice case in his favor and the respondents have treated him with discrimination.

8

D.

That balance of convenience also lies in favor of appellant and he is highly hopeful about the success of his appeal.

It is, therefore, most humbly prayed that on acceptance of instant application delay in filing of main appeal, may kindly be condoned in the best interest of justice.

S. Taimur

Applicant / Appellant

Syed Taimur Ali Shah

Dated:- . 04.2022

Through

Saif Ullah Mohmand

(Saif Ullah Mohmand)
Advocate, Peshawar

(8/A)

BEFORE THE SERVICE TRIBUNAL, K.P.K.
PESHAWAR.

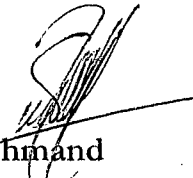
Service Appeal No _____/2022

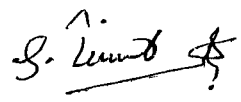
Syed Taimur Ali Shah VERSUS I.G. Police & others

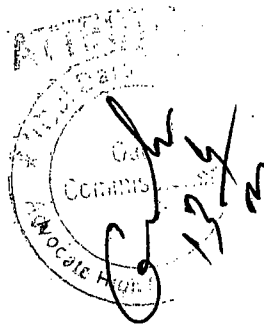
AFFIDAVIT

I, Syed Taimur Ali Shah Ex- Constable No 1743, Police Department, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed from this hon'ble court.

Identified by


Saif Ullah Mohmand
Advocate, Peshawar High Court.


Deponent





ACCIDENT & EMERGENCY DEPARTMENT

LADY READING HOSPITAL
MEDICAL TEACHING INSTITUTION
PESHAWAR, KP

Amount Paid : 20

9

A

Invoice # : K02200200807

Invoice Date : 21-JAN-20 12:23:41

NO : K02ACF20062367

Name : SYED TAMOOR

Gender : Male

Age : 25 Year(s)

District : Peshawar

Annex A

Spouse / Husband Name : ZAHIR SHAH

Admission Type : Acute Emergency Department : EMERGENCY

Complaints:

Operator : MUHAMMAD SHA

Counter : EMERGENCY

RX

Mx of RTA

- 7-8 months back

Clavicle fracture

Displaced left

Findings:

etc Pain in

left shoulder

ON/OFF

Pain in epigastrium

Refer to orthopedic room # 40

Tab Qalsan - 17

Tab Tetravit

Tab Tetravit

Tab Tetravit

Investigations:

Advice - x-ray chest (PA)

x-ray left shoulder on x-ray left shoulder

CBC

LFTs

RFTs

S. Electrolyte

Lipid Profile

Diagnosis: viral Dysentery

PT/INR

Next Visit:

After 1 month

Consultant Name:

Signature

INVOICE ISSUED BY WARD CLERK

Dr. [Signature] Director High Court Peshawar

[Signature] 21/01/2020

FINAL SHOW CAUSE NOTICE

10

B

I Superintendent of Police, Cantt, Capital City Police, Peshawar as competent authority, under the provision of Police Disciplinary Rules 1975 do hereby serve you FC Taimoor No. 1743 of Capital City Police, Peshawar as follows.

Annex B

1 (i) That consequent upon the completion of enquiry conducted against you by the enquiry officer for which you were given opportunity of hearing.

(ii) On going through the findings and recommendation of the enquiry Officer, the material on record and other connected papers produced before the E.O.

I am satisfied that you have committed the following acts/omissions specified in Police Disciplinary Rules 1975 of the said Ordinance.

"That you FC Taimoor No. 1743 while posted at PS Tehkal, Peshawar were absented from 25.03.2019 to till date without taking permission or leave. This act amounts to gross misconduct on your part and against the discipline of the force"

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of major punishment under Police Disciplinary Rules 1975 for absence willfully performing duty away from place of posting.

3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

4. If no reply to this notice is received within 7 days of its delivery, in normal course of circumstances, it shall, be presumed that you have no defence to put in and in that case as ex-parte action be taken against you.

5. The copy of the finding of the enquiry officer is enclosed.

(MOHAMMAD ASHFAQ)
SUPERINTENDENT OF POLICE,
CANTT: PESHAWAR

No. 1950 /PA, SP/Cantt: dated Peshawar the 21/10 /2019.

Copy to official concerned

ORDER

(11)

C
Annex C

This office order will dispose off the departmental proceedings against Constable Taimour Ali Shah No. 1743 who while posted to Police Station Tehkal, absented himself from his lawful duty with effect from 25.03.2019 to 04.11.2019 (224 days)

Under Police Disciplinary Rules 1975 (Amended 2014) proper charge sheet alongwith summary of allegation were issued against Constable Taimour Ali Shah No. 1743 and SDPO Town was appointed as enquiry officer to scrutinize the conduct of Constable Taimour Ali Shah No. 1743.

The enquiry officer submitted finding and recommended Constable Taimour Ali Shah No. 1743 for major punishment after issuing final show cause notice as he did not join the enquiry proceedings. Hence, he was issued final show cause notice, to which he submitted reply and produced three different medical reports claiming therein that he was sick. All the certificates were sent to MS LRH Peshawar for further verification/confirmation vide this office memo No. 2175/PA dated 25.11.2019. MS LRH reported that the given medical certificates were not found on the record of LRH and therefore were fake i.e vide Memo No. 32486/LRH/HR-VII dated 11.12.2019.

On 07.01.2020 he was called in orderly room and he was verbally cross examined by the undersigned. His reply is neither satisfactory nor convincing and he is again absent w.e.f 17.12.2019 till date.

Keeping in view of the above recommendation of Enquiry Officer and other material available on record, I, Tassawar Iqbal (PSP), SP Cantt, Peshawar being a competent authority, agreed with the recommendation of the enquiry officer. Therefore, under Police Disciplinary Rules 1975, Constable Taimour Ali Shah No. 1743 is hereby awarded major punishment of dismissal from service, with immediate effect.

3-1-2020

(TASSAWAR IQBAL) PSP
SUPERINTENDENT OF POLICE,
CANTT PESHAWAR

No. _____ /SP/Cantt: dated Peshawar, the 12/01/2020.

Copy for information and necessary action to the:-

1. The Sr: Superintendent of Police, Operation, Peshawar.
2. The Superintendent of Police Headquarter: Peshawar.
3. SDPO Town enquiry officer.
4. Pay Officer.
5. CRC.
6. OASI branch.
7. Fauji Missal branch with enquiry file for record. → 22
3. Official concerned.

RECEIVED
SUPERINTENDENT OF POLICE
CANTT PESHAWAR

خدمت جناب کینٹیل سٹی پولیس انسپکشن صاحب ضلع پشاور
ملکون:

محکمہ اہلکاروں کے لیے برائے عالی ملازمت و سب سے زیادہ حکم
فہری 991 SP/Cantl مورخہ 10-1-2020 جس کی
بناء پر مسائل کو ملازمت سے ہم فرخواست کیا گیا ہے۔
جناب عالی!

خود بانہ گزارش ہے کہ مسائل ایک مہنگے زار اور غریب خاندان سے
نہیں رکھتا ہے F.A پاس تعلیم یافتہ ہے۔ سال 2015ء کو NTS کے ذریعے
پشاور کینٹیل بھرتی ہو کر ریکروٹ کورس ٹریننگ کو P.T.C ہنگو سے پاس
کرنے کے شرائط منجہبی کو نیا بیت پی ایمانداری اور غرضیں شناسی سے رہنم
دیتا رہا۔ دوران ڈپوٹی موٹر سائیکل پر آکسیڈنٹ ہوا جس کی
وجہ سے بائیں کندھے کی یڈی کا فریکچر ہوا کہ مسائل کافی عرصہ
پر بیہوش بھی رہا مسائل کی بے ہوشی کی عالم میں کمزوری علاج معالجی
تعمیرات مسائل کی صحت قدرے بہتر ہوئی ہے مگر ڈپوٹی کھانہ ٹوٹر پیٹ
یا کے مسائل کو ڈپوٹی سے غیر حاضر کیا جا چکا اور مسائل کے خلاف انضباطی
تعمیرات بھی شروع ہوئی۔ مسائل کے مجاز ہفتہ کو حقیقت سے آگاہ کر کے مطمئن
ہیں کر دیا مگر بے سود ہو کر آفسر کا مسائل کو عنوان الیڈر کے حکم پر ہم فرخواست
کیا گیا۔ جو کہ مسائل کے ساتھ زیادتی ہے۔

اس لیے درخواست منظور فرمائیے کہ مسائل کی حالت زار یعنی مجید رحمت
کو سب سے نظر رکھیں مسائل کو ملازمت ہم دوبارہ بحال کر کے مذکورہ بالا سہنایا
آڈیٹ کو مستحضر ماسٹر مشن کو رہنمائیں۔ طرہ ہجر دعاریوں گا۔

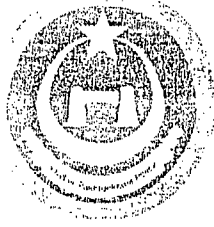
شکریم 10/06/2020

کاشف زلفزار

آپ کا مالدار کینٹیل
شمارہ شاہ نمبر 1743 سابقہ کینٹیل PCC-2
0343 9816398

IG. Steblishminil Kashif Zulfaraz

Advocate
High Court Peshawar



13

E

OFFICE OF THE
CAPITAL CITY POLICE OFFICER
PESHAWAR
Phone No. 091-9210989
Fax No. 091-9212597

Annex E

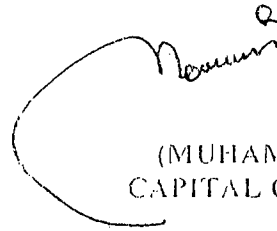
ORDER.

This order will dispose of the departmental appeal preferred by Ex- Constable Syed Taimur Ali Shah No.1743 who was awarded the major punishment of "Dismissal from service" by SP/Cantt: Peshawar vide OB No.122, dated 09-01-2020.

2- The allegations leveled against him were that he while posted in Police Station Tehkal Peshawar absented himself from his lawful duty w.e from 25-03-2019 to 04-11-2014 for a total period of (224 days) without leave or prior permission from the competent authority.

3- He was issued proper Charge Sheet and Summary of Allegations by SP/Cantt: Peshawar and SDPO Town was appointed as enquiry officer to scrutinize the conduct of Constable Taimur Ali Shah No.1743. The enquiry officer after conducting proper departmental enquiry submitted his findings recommended the delinquent official for major punishment. The competent authority in light of the finding of enquiry officer issued him Final Show Cause Notice. He submitted his reply which was found unsatisfactory, hence was awarded the major punishment by the competent authority.

4- He was heard in person in O.R. The relevant record perused along with his explanation but the appellant failed to submit any plausible explanation. Therefore his appeal for reinstatement in service is dismissed/rejected.

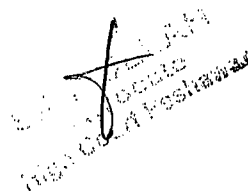


(MUHAMMAD ALI KHAN)PSP
CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 426-33 /PA dated Peshawar the 30-04-2020

Copies for information and n/a to the:-

1. SP/Cantt Peshawar.
2. SP/HQrs Peshawar
3. OS/CRC/OASI/Pay Officer.
4. FMC along with FM
5. Official concerned.


SP/Cantt Peshawar

آفس آف PIO صاحب جناب انسپکٹر جنرل آف پولیس خیبر پختونخواہ پشاور

جناب عالی!

موردبانہ گزارش ہے کہ سال تکہ پولیس میں سال 2015 میں بھرتی ہوا تھا بعد ازاں سائل روڈ ایکسیڈنٹ کی وجہ سے ڈیوٹی سے غیر حاضر رہا جسکی وجہ سے ایس پی کینٹ نے مجھے نوکری سے برخواست کیا بعد میں سائل نے آئی جی پی صاحب کو رجم کی اپیل کی لیکن وہ منظور نہیں ہوا اسب مجھے سروس ٹریبیونل میں کیس کرنے کے لیے میری درخواست، جو رجم اپیل کے لئے آئی جی پی صاحب کو دی تھی اور ساتھ میں Revision Petition کی کاپی چاہیئے۔ لہذا آپ صاحبان سے درخواست ہے کہ RTI Act 2013 کے تحت مجھے فراہم کریں۔

عین نوازش ہوگی۔

العارض

آپکا تابع فرمان کنشیل سید تیمور علی شاہ نمبر 1743
موبائل نمبر: 0343-9816338

Advisate
High Court Peshawar



(15)

**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar**

No. _____ / Legal, dated Peshawar, the _____ / _____ / 2021.

To: - The Superintendent,
Secret, CPO Peshawar.

Subject: **PROVISION OF INFORMATION UNDER RTI ACT 2013.**
Memo:

Enclosed find a self explanatory application submitted by Syed Taimour Ali Shah under RTI Act 2013 is sent herewith for provision of the requisite documents for onward submission to concerned quarter please.

PIO/ AIG/LEGAL
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar
01.04.2022


High Court Peshawar



OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
PESHAWAR.

No. S/ 3961 /20, dated Peshawar the 12/11/2020.

ORDER

Annex G1

This order is hereby passed to dispose of Revision Petition under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 (amended 2014) submitted by **Ex-FC Taimur Ali Shah No. 1743**. The petitioner was dismissed from service by SP/Cantt: Peshawar vide OB No. 122, dated 09.01.2020 on the allegations of absence from duty w.e.f 25.03.2019 to 04.11.2019 for a total period of 224 days. His appeal was rejected by Capital City Police Officer, Peshawar vide order Endst: No. 426-33/PA, dated 30.04.2020.

Meeting of Appellate Board was held on 17.09.2020 wherein petitioner was heard in person. During hearing petitioner contended that he was injured in a road accident.

Perusal of the record reveals that the petitioner remained absent for long period of 224 days. He has earned 03 bad entries during his service. His medical reports were sent to MS LRH Peshawar for verification vide SP/Cantt: Peshawar letter No. 2175/PA, dated 25.11.2019 which were found fake/bogus vide Hospital Director, LRH Peshawar office letter No. 32486/LRH/HR-VII, dated 11.12.2019. Therefore, the Board decided that his petition is hereby rejected.

This order is issued with the approval by the Competent Authority.

Sd/-

DR. ISHTIAQ AHMED, PSP/PPM
Additional Inspector General of Police,
HQrs: Khyber Pakhtunkhwa, Peshawar.

No. S/ 3962-70 /20,

Copy of the above is forwarded to the:

1. Capital City Police Officer, Peshawar. One Service Roll, one Fauji Missal and one enquiry file of the above named Ex-FC received vide your office Memo: No. 11934/CRC, dated 13.08.2020 is returned herewith for your office record.
2. Superintendent of Police, Cantt: Peshawar.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. PA to AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt: E-IV CPO Peshawar.

Handwritten signature and stamp of the Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

(KASHIF ZULFIQAR) PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.

SERVICE VERIFICATION PROFORMA

H

GO/AGO No. _____

VRC No. _____

Dated: _____

Dated: _____

1. Full Name. Syed Taimur Ali Shah 2. CNIC. _____

Annex H

17301-94539

3. Contact No. 0345-7070770 4. Place of Birth. _____

Wadpatta Peshawar

5. Date of Birth. 11-03-1995 6. Domicile. _____

Peshawar

7. Father Name. Syed Zahid Shah 8. Father CNIC. _____

17301-544310

9. Husband/Wife Name. — 10. Husband/Wife CNIC No. —

10. Permanent Address. Mohallah B.H.U.Hospital Wadpatta P

11. Permanent P/S. Wadpatta 12. Present Address. _____

Wadpatta Peshawar

13. Present P/S. Wadpatta 14. District. _____

Peshawar

15. Caste/Tribe. Syed 16. Education. _____

F.A

17. Previous Profession. NIL 18. Political Affiliation. _____

NIL

19. Nationality. Pakistani 20. Character/Antecedent _____

Punctual & hard

21. Remarks (if any). —

22. Criminal Record P/S. (if any) Nil

23. Utility Bills if any (in the name of Applicant) —

24. Name of Land Lord if live in rented house. Syed Shah Bilal Bukhari

25. CNIC No/with Contact No. Land Lord. 17301-1602830-7 / 0343-967347

26. How long has Applicant residing in the house. Fifteen year's

27. Revenue Record.

(i). In his Name. Syed Taimur Ali Shah (ii). In his father name. Syed Zahid Shah

28. Record of Government Services of Applicant family. If any Nil

29. In case of immigrant.

(i). Previous Nationality. Pakistani (ii). Citizen ship Certificate. Peshawar

30. Attestation.

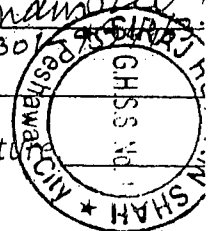
✓(i). Gazetted Officer Name/Seal/with CNIC No. _____

Principal High School Peshawar (NSR)
17301-163070-3

✓(ii). Gazetted Officer Name/Seal/with CNIC No. _____

31. Name of Beat Officer. _____ 32. Signature. _____

33. Name of AGO. _____ 34. AGO Seal/Signature _____



Signature of Syed Taimur Ali Shah
17301-94539

MEDICAL CERTIFICATE

Name of official Mr Syed Taimur Ali Shah

Caste or race Syed Muslim

Father's name Syed Zahid Shah

Residence Dalazak road Wadpaggah Peshawar

Date of birth 11-3-1995

Exact height by measurement 5-8

Personal mark of identification _____

Signature of the official S. Taimur Ali

Signature of head of office _____

Seal of office _____

I do hereby certify that I have examined Mr. S Taimur Ali Shah a candidate for employment in the Office of the Police Department KPK and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except _____

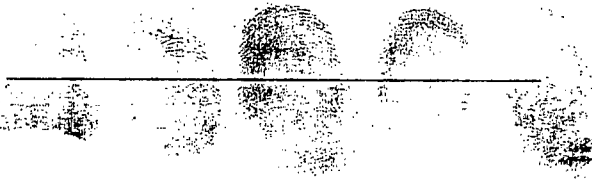
I do not consider this as disqualification for employment in the office of the Police

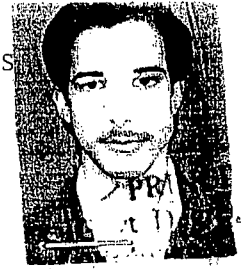
His age according to his own statement 20 year and by appearance about year Twenty

[Faint stamp: District Health Officer, Peshawar]

[Signature]
MEDICAL SUPERINTENDENT.
CIVIL HOSPITAL

LEFT HAND THUMB AND FINGER IMPRESSIONS





Verification form for Initial Appointments Under the Government of K.P.

(To be filled in by the Candidate personally)

Name Syed Taimur Ali Shah Father's Name Syed Zahid Shah
 Father's Profession Labour 4. Caste Syed
 Religion Islam 6. Sect Sunni
 Date of Birth / Age 11-3-1995 8. District of Domicile _____
 Present Address Dalazak Road Dakhana Wadpatta Peshawar
 Permanent Address _____
 Police Station Chamkani 12. Mobile No. 0343-9816398
 NIC No. 17301-9453937-3 14. Passport No. _____ (Please attach copy)
 Previous Experience in Govt. Service (Army/Police/Civil) Civil
 (a) Post Held with Grade _____
 (b) Date of Leaving Govt. Service _____
 (c) Reasons for leaving Govt. Service _____ (Please attach copy)

Educational Qualification:-

Certificate/Degree	Name of Institution	Year
<u>Matric</u>	<u>Govt High School Wadpatta</u>	<u>March 2011</u>
<u>FA</u>	<u>Govt Degree College Wadpatta</u>	<u>May 2015</u>

Family Detail		Relation (Father / Brother / Son / etc. In Law)	Occupation	Age (Approximate)	Address
No	Name of Relative				
	<u>Syed Zahid Shah</u>	<u>Father</u>	<u>labour</u>	<u>50</u>	<u>Wadpatta Peshawar</u>
	<u>Syed Bilal Shah</u>	<u>brother</u>	<u>labour</u>	<u>30</u>	<u>Same</u>
	<u>Syed Zuhair Ali</u>	<u>Same</u>	<u>student</u>	<u>28</u>	<u>Same</u>
	<u>Syed Syed Azeem</u>	<u>Same</u>	<u>student</u>	<u>25</u>	<u>Same</u>
	<u>Syed Sadam Hussain</u>	<u>Same</u>	<u>student</u>	<u>23</u>	<u>Same</u>

(Signature)
 Syed Taimur Ali Shah
 Candidate

19. Previous Job Experience

20

S. No	Previous Experience	Period	Name & Address of Employer	year
1.	Nil	Nil	Nil	
2.	Nil	Nil	Nil	
3.	Nil	Nil	Nil	

20. Office Bearer of any Union in Past/Present

S. No	Name of the Union	Post Held	year
1.	Nil	Nil	
2.	Nil	Nil	
3.	Nil	Nil	
4.	Nil	Nil	

21. Whether arrested, prosecuted or convicted in any case, terrorism or otherwise and restricted or exhorted, if so, full particulars including dates should be furnished.

22. Detail of Registered Criminal Cases (if any)

S. No	Case No. & Date	Office/Under Section	Police Station / District	Result of Investigation	Court Decision
1.	Nil	Nil	Nil	Nil	
2.	Nil	Nil	Nil	Nil	
3.	Nil	Nil	Nil	Nil	
4.	Nil	Nil	Nil	Nil	

23. Three References with Their Names & Addresses

S. No	Name & Parentage	Designation / Address	Phone No.
1.	S. Javed Miskin s/o S. Iqbal Hussain	Ward No. 24, Wadda Pice	03459152648
2.	S. Hakeem Ahmad s/o Hakeem Rehman	Ward No. 24, Wadda Pice	03115985000
3.	S. Siraj Hussain s/o Fajal	Ward No. 24, Wadda Pice	03436680449
4.			

24. Detail of Military/Jihadi Training (if received)

Yes

No

If yes: Year _____

Place _____

25. Affiliation with Defunct Religious Organization (Present/Previous)

Post held _____ Year _____

High Court Peshawar

26. Affiliation of any family member (as indicated in Column No. 18) with any defunct organization

_____ (21) _____

Post held _____ Year _____

27. Any family member (as included in Column No. 18) arrested, prosecuted, as in any case, terrorism or otherwise and restricted or exhausted, if so full particulars including dates should be furnished.

28. Declaration:

- (i) I solemnly affirm and declare that all the information given above is correct to the best of my knowledge and I have not concealed any fact.
- (ii) I further undertake that neither me nor any of my family members is involved in any suspicious criminal activity and no case is registered against me except as given in column No. 22 I may be prosecuted if I have concealed any facts or have given wrong information.

Name Syed Taimur Ali Shah s/o Syed Zahid Shah

Thumb Impression



Signature

S. Taimur Shah

Date:

3-12-2015

Note:- attach certified copies of the following documents:-

1. CNIC
2. Photograph
3. Discharge Certificate (If ex-employee)

f

Certificate

It is notified that Syed Faruk
S/o Syed Zahid Shah is a permanent resident of
my village and I know him personally

Thanks.

محمد علی

رہنوردی محفل شہداء ہلالہ علیہ السلام
کوئٹہ 2015-12-03
مقامی سطح پر شہداء ہلالہ علیہ السلام
کی تعظیم و تکریم کے لیے
مقامی سطح پر شہداء ہلالہ علیہ السلام
کی تعظیم و تکریم کے لیے
مقامی سطح پر شہداء ہلالہ علیہ السلام
کی تعظیم و تکریم کے لیے

Handwritten signature
H-87-17-Stamp 2
3-12-15

ماہیہ ہلالہ علیہ السلام اور کھانا
ہلالہ علیہ السلام کے لیے
سید محمد علی شاہ ولطیف شاہ
پتھر کھنڈر کے ساتھ

Syed J. of 611 S...
General Nazim
Phone: 224-Wodpage
Email: wodpage

امور کھنڈر کے ساتھ
محمد علی شاہ
03-12-2015
Verified by abom

Handwritten signature
CHLC
03-12-2015



از پیشگاہ صاحب سپرنٹنڈنٹ بہادر (23)

ضلع بہادر

بخدمت صاحب سپرنٹنڈنٹ بہادر پولیس

ضلع بہادر

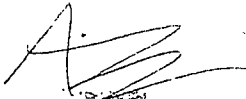
نقشہ ہذا برائے خانہ پُری مندرجہ ذیل امور ان کے

مُرسل ہوئے۔

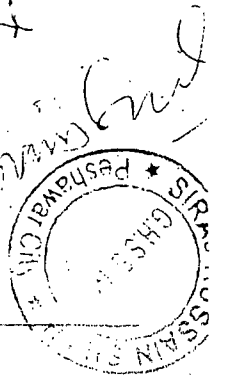
پاس سب انسپکٹر صاحب قمانہ چکھنی

سال ۲۰۰۰ء

مورخہ


سپرنٹنڈنٹ بہادر پولیس

۱	۲	۳
نام تصدیق کنندہ متعلق چال چلن بقدر دستخط	بیان نمبر داران نسبت مزایابی سابقہ و برخاستگی اگر کوئی ہو شخصیت قومیت بقدر دستخط	رپورٹ افسر اسٹیشن دوبارہ مزایابی سابقہ چال چلن نسبت مزایابی و برخاستگی اگر کوئی ہو شخصیت قومیت وغیرہ
میں تصدیق کرتا ہوں کہ سید محمود شاہ صاحب سنہ ۱۵۰۰ھ و ۱۵۰۱ھ مستقل سید احمد شاہ صاحب جلد ۱ - کسٹمر عبدالعزیز مرفوعہ میں دو تہ سیرج	غیر مستحق ۱۵-۱۲-۲۰۰۰ عابد علی مسلح مسلح ولید علی اعجاز شاہ صاحب نار یا شاہ صاحب غافل در راجہ سیر سیرج عبدالعزیز صاحب سیرج کدو ۱۵-۱۲-۲۰۰۰	خبر - ۱۵ سید احمد شاہ صاحب و سید محمود شاہ صاحب ۱۵-۱۲-۲۰۰۰ ۱۵-۱۲-۲۰۰۰ ۱۵-۱۲-۲۰۰۰ ۱۵-۱۲-۲۰۰۰ ۱۵-۱۲-۲۰۰۰ ۱۵-۱۲-۲۰۰۰



(24)

فارم نمبر (ا) 12-18

حکومت پولیس

ضلع لیٹاور

نقشہ تصدیق چال چلن رنگروٹ پنام سندھ دہمور رطلی شاہ نمبر

جو تاریخ 2015-12-2 سال 2015ء سے بعدہ کنسٹیبل بھرتی کیا گیا۔

ولدیت: مظاہر شاہ ذات: سید گوت سنی مذہب: اسلام
 ساکن محلہ: دلہ زارہ روڈ روڈ محلہ موضع: ڈیرہ محلہ تھانہ: چمکلی ضلع: لیٹاور
 علیہ: نسیم سفید عمر: 199 سال 03 ماہ 11 دن قد: 5 فٹ 8 انچ چھاتی: 33x34 انچ
 نشانات خاص: دائمی قابل شناخت کوئی نہیں

تعلیم	حالات	ملازمت			سابقہ		قریبی رشتہ داران	
		تاریخ ملازمت	عرصہ	تاریخ طغی	نام	سکونت		
F.A		از	تا	سال	ماہ	دن	بیٹا	سکونت
							بیٹی	
							بیوی	
							والد	
							والدہ	
							بھائی	
							بھائی	

قریبی رشتہ داران جو گورنمنٹ ملازمت میں ہیں۔

نام کیا رشتہ ہے	کس عہدہ پر ہے	کس محکمہ میں ہے	کس مقام پر ہے	کیفیت
سید سراج مسز	SSP	ایجوکیشن	ایس ڈی	

میں مندرجہ بالا شخص / اشخاص یا شخصیں اپنا وارث قرار دیتا ہوں، یہ نام مفصل تحریر کریں۔

میں اقرار کرتا ہوں کہ مندرجہ بالا امور میں جو میں درج کرائے ہیں، درست ہیں۔

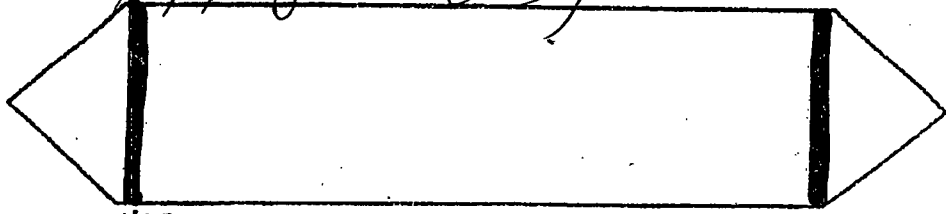
رکھو یا نشانات

	<p>اقبال صلی اللہ علیہ وسلم 1600ء کو 11/17 ...</p>		<p>والسی</p>
	<p>دوستانہ ... 37 روز ...</p>		<p>حافری</p>

(18)

Annex I

بعدالت لیسٹس ٹیکو ٹھونڈی کراچی



سید شہزاد علی شاہ بنام آئی سی اے
20 بجانب

موزخہ
مقدمہ
دعویٰ
جرم

سید شہزاد علی شاہ
S. S. S.

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ
آن مقام لیٹا اور کیلئے لیٹا اور کے لئے

مقرر کر کے اتر کر کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو رضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور
بہ صورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زر میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کارروائی 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 مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ درجہ جات التوائے مقدمہ کے سبب سے ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
ڈگری کر کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Handwritten signature and a circular stamp of the 'Safdar Ali Khan' court.

الرقوم 13 ماہ 13 2022

بمقام لیٹا اور کے لئے منظور ہے۔