

20.10.2022

Syed Asif Shah, Advocate learned counsel for the appellant present.

Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 26.12.2022.

Rs-100/-  
Appellant Deposited  
Security & Process Fee

A. Asif Shah  
26/10/22

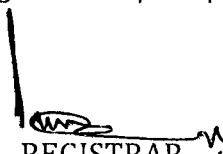


(Mian Muhammad)  
Member (E)

Form- A

## FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 661/2022 \_\_\_\_\_

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 Qasim Shah presented today by Syed Asif Shah 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-	24-5-22	<p>This case is entrusted to touring Single Bench at A.Abad for preliminary hearing to be put there on <u>14-6-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>
14.06.2022		<p>Appellant in person present.</p> <p>Lawyers are on general strike, therefore, case is adjourned to 18.08.2022 for preliminary hearing before S.B at Camp Court, Abbottabad.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J) Camp Court, A/Abad</p>

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

Service appeal No 661 of 2022

Syed Qasim Shah.....Appellant

**VERSUS**

The Inspector General of Police KPK  
Peshawar.....Respondents

**APPEAL**  
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**Dated 23.04.2022**

**SYED QASIM SHAH**  
(Appellant)

Through:-

**SYED ASIF SHAH**  
**ADVOCATE HIGH COURT**  
**At Mansehra**

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

Service appeal No \_\_\_\_ of 2022

Syed Qasim Shah son of Zahiroon Shah,  
resident of Kund Tilli, Hassan Zai, Tehsil  
Kandar Hassan Zai, District Torghar, Ex-Police  
Constable No. 153 (BPS-07) Torghar.

.....Appellant

**VERSUS**

- 1) The Inspector General of Police Khyber Pakhtunkhwa, Peshawar.
- 2) The Divisional Inspector General of Police Hazara Division Abbottabad.
- 3) The District Police Officer, District Torghar.

.....Respondent  
s

**APPEAL UNDER SECTION 4 OF KPK**  
**SERVICE TRIBUNAL, ACT, 1974 AGAINST**  
**THE IMPUGNED ORDER NO. OB NO. 38**  
**DATED 04.02.2021 WHEREBY THE**  
**MAJOR PENALTY WAS IMPOSED ON THE**  
**APPELLANT BY RESPONDENT NO. 03**  
**APPELLANT WAS DISMISSED FROM**  
**SERVICE AND ORDER No. 9300 dated**  
**dated 06.05.2021 and ORDER NO 797-**

**803/22 DATED 14.04.2022, PASSED BY  
RESPONDENT NO. 01 WHEREBY ORDER  
OF RESPONDENT NO. 03 WAS UPHELD  
AND DEPARTMENTAL APPEAL OF  
APPELLANT WAS REJECTED.**

**PRAYER:-**

On acceptance of the instant service appeal, the impugned orders bearing No OB No. 38 dated 04.02.2021, passed by respondent No. 03, order No. 9300 dated 06.05.2021 passed by respondent No. 02 and order No. 797-803/22 dated 14.04.2022 passed by respondent No. 01 may kindly be set-aside declaring them illegal, wrong, unlawful, without lawful authority, void and against the law on the subject and appellant be re-instated into service with all back benefits.

**Respectfully Sheweth:-**

1. That, appellant is permanent resident of District Torghar.

(copy of Domicile and CNIC annexed as annexure "A&B" respectively).

2. That, appellant passed his intermediate exam and having the Diploma of Associate Engineer.

(copy of Educational testimonials are annexed as annexure "C").

3. That, respondents announced some vacancies in Police Department for District Torgar and the appellant passed his test and interview appointed as Police Constable BPS-07 and allotted police constabulary Number 153.

**(copy of Appointment order, service Card and salary slip annexed as annexure "D&E" respectively).**

4. That, during the service impugned FIR Sr. No. 1260 No. 293/19 dated 26.07.2019 registered under section 489-F PPC police station city Karachi registered against the appellant.

**(copy of FIR annexed as annexure "F")**

5. That, department/respondent conduct inquiry against the appellant in this respect charge sheet issued against the appellant.

**(copy of charge sheet annexed as annexure "G").**

6. That, after conducting the departmental proceedings the respondent No. 03 issued the impugned order No. OB 38 dated 04.02.2021 vide which the appellant was dismissed from service.

**(copy of impugned order dated 04.02.2021 annexed as annexure "H").**

7. That, appellant feeling aggrieved from the above dismissal order after knowing and receiving the dismissal order filed a departmental presentation before the respondent No. 02 which was rejected vide impugned order 9300 dated 06.05.2021.

**(copy Departmental appeal and impugned order dated 06.05.2021 is annexed as annexure "I&J").**

8. That, being aggrieved from both the orders appellant again filed a Departmental representation pursuing his case before the respondent No. 01 which was rejected vide impugned order No. 797-803/22 dated 14.04.2022.

**(Copy of Departmental appeal and impugned order 14.04.2022 annexed as Annexure "K&L").**

9. That, appellant on the basis of compromise in the above mentioned FIR acquitted from the charge on dated 15.02.2021 from the court of competent jurisdiction.

**(copy of order dated 15.02.2021 annexed as annexure "M").**

10. That, felling aggrieved from the both the impugned orders No. OB38 dated 04.02.2021 and 797-803 dated 14.04.2022 appellant no other remedy

except to prefer present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other grounds.

### **GROUND:-**

- A) That, the impugned orders are wrong, illegal, unlawful, against the services rules and law.
- B) That, the respondent imposed the major penalty on the appellant despite the matter has been patch up and competent court already acquitted the appellant from the charge, all these fact and producing the compromise acquittal order to the respondents, but respondents ignore the said fact and burnished aside all the relevant rules and law beside.
- C) That, respondents never given an opportunity to the appellant for personal hearing/reply and not follow the proper procedure and law.
- D) That, before passing the impugned order, appellant was not put on notice to present his view point/explanation under the Doctrine of **AUDI AULTEM PARTEM**, hence, the impugned orders



are not sustainable and maintainable under the law on this very sole ground.

- E) That, no evidence worth name was attempted to collect by respondent No 03 against the appellant for alleged impugned FIR dispute his acquittal from the impugned FIR but the respondents did not bother all these facts which the appellant narrated before the respondents. But respondents failed to do so.
- F) That, appellant had a long unblemished service record at his credit and he has been dismissal from service with a single stroke of pen without observing due process of law.
- G) That, no complaint was ever filed by any one against the appellant nor appellant ever been involve any criminal charge and the appellant did not no about the proceedings insisted in impugned FIR and not deliberately absconder from the legal procedure.
- H) That, the impugned orders on its very face value, are illegal, unlawful, without lawful authority, without jurisdiction and of having no legal effect hence liable be struck down.
- I) That, as per the service rules and law of the superiors courts if an employee

acquitted on the basis of compromise he must be re-instated in his service for the reason that acquittal on the basis of compromise is to be consider in an Honourable acquittal, hence the appellant must be reinstated in his service with all back benefits.

- J) That, appellant through news papers informed the public that the appellant has no concerned for any fake account which is open in his name and also applied for the concerned bank to the request that the appellant has no concerned for so called fake account which is opened in his name.
- K) That the grant father of the is serially ill and the appellant is the only person to look after his grandfather, in this period the appellant along with grand father visit to the Karachi Hopsital for his better treatment due to which appellant being attended of his grandfather and having no knowledge about the dismissal/rejection order of the respondents not filed departmental appeal with in time.

**(copy of medical record annexed as annexure "N").**

- L) That, the appellant pursuing his case regularly and never slept over his right.

- M) That, the appellant is the only person his house to look after his grand father because the father of the appellant is a daily wager and the only one bread winner of the entire family.

**PRAYER**

On acceptance of the instant service appeal, the impugned orders bearing No OB No. 38 dated 04.02.2021, passed by respondent No. 03, order No. 9300 dated 06.05.2021 passed by respondent No. 02 and order No. 797-803/22 dated 14.04.2022 passed by respondent No. 01 may kindly be set-aside declaring them illegal, wrong, unlawful, without lawful authority, void and against the law on the subject and appellant be re-instated into service with all back benefits.

**Dated 22.04.2022**

**SYED QASIM SHAH**  
(Appellant)

Through:-

  
**SYED ASIF SHAH**  
**ADVOCATE HIGH COURT**

**CERTIFICATE :**

I, Syed Qasim Shah son of Zahiroon Shah, resident of Kund Tilli, Hassan Zai, Tehsil Kandar Hassan Zai, District Torghar, Ex-Police Constable No. 153 (BPS-07) Torghar, it is certified that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal. Further stated that neither any appeal filed before any court nor pending before this court or any other court.

**SYED QASIM SHAH  
(DEPONENT)**

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

Service appeal No \_\_\_\_\_ of 2022

Syed Qasim Shah..... **Appellant**

**VERSUS**

The Inspector General of Police KPK  
Peshawar..... **Respondents**

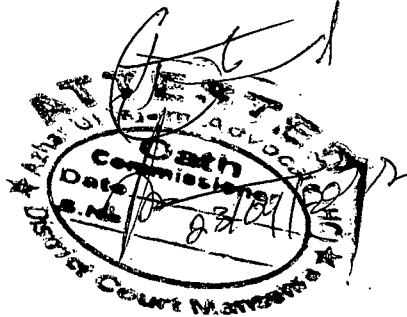
**APPEAL**

**AFFIDAVIT**

I, Syed Qasim Shah son of Zahiroon Shah, resident of Kund Tilli, Hassan Zai, Tehsil Kandar Hassan Zai, District Torghar, Ex-Police Constable No. 153 (BPS-07) Torghar, do hereby solemnly affirm and declare on oath that the no such subject matter appeal has ever been filed before this honorable court 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.

**Dated 22.04.2022**

**SYED QASIM SHAH**  
**(DEPONENT)**



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

Service appeal No \_\_\_\_\_ of 2022

Syed Qasim Shah..... **Appellant**

**VERSUS**

The Inspector General of Police KPK  
Peshawar..... **Respondents**

**APPEAL**

**APPLICATION FOR CONDONATION OF**  
**DELAY IN PRESENTING THE INSTANT**  
**SERVICE APPEAL.**

**Respectfully shewith!**

- 1). That, this application may kindly be treated as part and parcel of the main appeal.
- 2). That, appellant filed Departmental appeal within time i.e 09.03.2021, against the impugned order dated 04.02.2021 after knowing and receiving the impugned order which was turndown on dated 06.05.2021. Thereafter appellant submitted his appeal/application filed before the respondent No. 01 which was turndown dated 14.04.2022.

- 3). That, appellant kept on visiting the office of respondents time and again but respondents being told and assured that he was going to be reinstated into service, due to which, appellant could not file the instant appeal within time.
- 4). That, the impugned order on its very face value is a void order and under the law, no limitation runs against a void order.
- 5). That the grant father of the appellant is serially ill and the appellant is the only person to look after his grandfather, in this period the appellant along with grand father visit to the Karachi Hopsital for his better treatment due to which appellant being only attended of his grandfather and having no knowledge about the dismissal/rejection order of the respondents not filed instant appeal with in time.
- 6). That, the appellant pursuing his case regularly and never slept over his right. The delay filing the instant appeal is not deliberately, intentionally and will fully rather the appellant is vigilant to avail his remedy before the competent jurisdiction/authority.
- 7). That, the appellant belong to poor family and having no other source of income except to this service the whole family dependent on the appellant and appellant is only Government employee in his whole family.

It is therefore very humbly prayed that the acceptance of the instant application may kindly be allow in the light of above mentioned fact, his appeal may kindly be condone and the case of the appellatant be decided on merits.

**Dated 22.04.2022**

**SYED QASIM SHAH**  
(Appellant)

Through:-

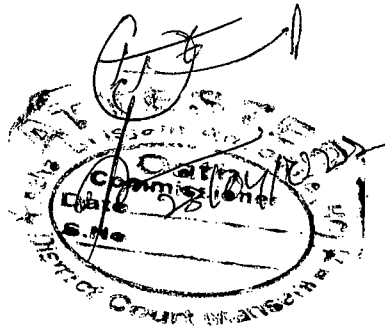


**ASIF ALI SHAH**  
**Advocate High Court**

**AFFIDAVIT!**

I, Syed Qasim Shah son of Zahiroon Shah, resident of Kund Tilli, Hassan Zai, Tehsil Kandar Hassan Zai, District Torghar, Ex-Police Constable No. 153 (BPS-07) Torghar, do hereby solemnly affirm and declare that the contents of fore-going application are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.

**SYED QASIM SHAH**  
**(DEPONENT)**





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

Service appeal No \_\_\_\_\_ of 2022

Syed Qasim Shah..... **Appellant**

**VERSUS**

The Inspector General of Police KPK  
Peshawar..... **Respondents**

**APPEAL**

**APPLICATION FOR SUSPENSION OF THE  
OPERATION OF THE IMPUGNED ORDERS  
PASSED BY THE RESPONDENTS AND FOR  
ISSUANCE OF STATUS-QUO TO THE EFFECT  
THAT RESPONDENTS MAY PLEASE BE  
RESTRAINED FROM CARRYING OUT ANY  
RECOVERY PROCEEDINGS AGAINST THE  
APPELLANT, FROM APPOINTING ANY OTHER  
PERSON AGAINST THE POST OF POLICE  
CONSTABLE ISSUING ANY APPOINTMENT  
ORDER OR DOING ANY OTHER ACT WHICH  
DIRECTLY OR INDIRECTLY AFFECTS THE  
RIGHTS OF THE APPELLANT TILL THE  
DISPOSAL OF THE TITLED SERVICE APPEAL**

**Respectfully shewith!**

- 1). That, this application may please be considered as part and parcel of the titled appeal.
- 2), That, the appellant has a prima facie case and there is every hope of its success.
- 3). That, the balance of convenience also tilts in favour of the appellant.

4. That, if the operation of impugned order has not been suspended and the status-quo has not been granted then the appellant would suffer an irreparable loss and purpose of the tiled appeal would become infructuous.

**It is, therefore, most humbly requested** that on acceptance of the instant appeal, the operation of impugned orders passed by the respondents may please be suspended and the status-quo and motioned in the heading of the instant appeal may also be issued/passed.

**Dated 22.04.2022**

**SYED QASIM SHAH**  
(Appellant)

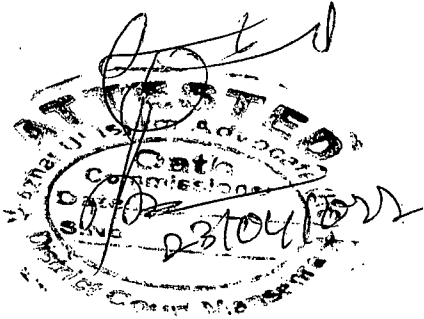
Through:-



**ASIF ALI SHAH**  
**Advocate High Court**

**AFFIDAVIT!**

I, Syed Qasim Shah son of Zahiroon Shah, resident of Kund Tilli, Hassan Zai, Tehsil Kandar Hassan Zai, District Torghar, Ex-Police Constable No. 153 (BPS-07) Torghar, do hereby solemnly affirm and declare that the contents of fore-going application are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.



**SYED QASIM SHAH**  
**(DEPONENT)**

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

Service appeal No \_\_\_\_ of 2022

Syed Qasim Shah.....Appellant

**VERSUS**

The Inspector General of Police KPK  
Peshawar.....Respondents

**APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**

**APPELLANT:**

Syed Qasim Shah son of Zahiroon Shah,  
resident of Kund Tilli, Hassan Zai, Tehsil  
Kandar Hassan Zai, District Torghar, Ex-Police  
Constable No. 153 (BPS-07) Torghar.

**RESPONDENTS:**

- 1) The Inspector General of Police Khyber  
Pakhtunkhwa, Peshawar.
- 2) The Divisional Inspector General of  
Police Hazara Division Abbottabad.
- 3) The District Police Officer, District  
Torghar.

**Dated 22.04.2022**

**Syed Qasim Shah**  
(Appellant)

Through:-

**SYED ASIF SHAH**  
**ADVOCATE HIGH COURT**  
**At Mansehra**

Annex 'C' 19

Sl.No  
Y - 008688

Roll No.  
413390

# Board of Secondary Education, Karachi



## Secondary School Certificate Examination, 2010

### SCIENCE GROUP

Certified that **QASIM SHAH**  
 Son/Daughter of **ZAHIROON SHAH**  
 whose date of birth is **TWELFTH FEBRUARY** one thousand nine hundred  
**NINETY TWO** has duly passed the Secondary School Certificate Examination held in  
 the month of **MARCH 2010** as a **REGULAR** candidate in the subjects mentioned below  
 and has been placed in **GRADE B** He obtained **535** Marks out of **850**

COMPONENT I	COMPONENT II
SINDHI SALEES URDU NORMAL ENGLISH PAKISTAN STUDIES ISLAMIAT	MATHEMATICS BIOLOGY PHYSICS CHEMISTRY

**COMPONENT III**  
 He offered  
 XXXXXXXXXXXX  
 as Vocational Subject and has  
 been awarded grade **XXXX**  
 by his / her Institution on the  
 basis of Internal Assessment

**SYED ASIF SHAH**  
 ADVOCATE HIGH COURT

*[Signature]*

DATED 18-Dec-2012

Mrs. Hoor Mazhar  
Secretary

Note: This certificate is issued without alteration or signature. Please also see on the reverse.

20

Phone: 9231207  
9232094

# Government Islamia Arts & Commerce College



M.A. Jinnah Road, Karachi.

No. 4845 **Provisional Certificate**

**Certified** that Mr. Qasim Shah  
son of Mr. Zahir-oon Shah has been on the rolls  
of this college for 2014 year.

He has passed his Intermediate Arts / Commerce examination  
from the Karachi Board, B.A/B.Com. examination from the University  
of Karachi, in the year 2014 and was placed in "D" Grade  
Grade / Division (Seat No. 508807)

He participated in \_\_\_\_\_

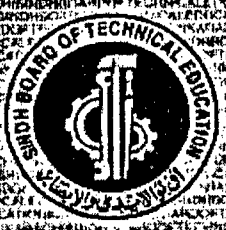
To the best of my knowledge and belief he bears a good moral Character.

Dated 3/01/2015

Principal **PRINCIPAL**  
GOVT. ISLAMIA ARTS & COMM. COLLEGE  
KARACHI (MORNING)

**SYED ASIF SHAH**  
ADVOCATE HIGH COURT

# SINDH BOARD OF TECHNICAL EDUCATION KARACHI



Serial No. 443

Roll No. B1850

Reg. No. DAE/EVE/1264/2010-11

## STATEMENT OF MARKS

### DIPLOMA OF ASSOCIATE ENGINEER

EXAMINATION OF THIRD YEAR (EVENING) ANNUAL EXAMINATION 2013

TECHNOLOGY COMPUTER INFORMATION TECHNOLOGY

NAME OF THE CANDIDATE: **Qasim Shah**

FATHER'S NAME: **Zahiruddin Shah**

NAME OF INSTITUTE: **Govt. College of Technology, Karachi**

SUBJECTS / PAPERS	MARKS			
	Theory		Practical	
	Max.	Obtained	Max.	Obtained
GEN311 Islamiyat/Pakistan studies	50	30	50	30
ENG311 Technical Report Writing	50	28	50	28
MGT311 Management	50	34	50	34
COMP313 Network & Administration	100	72	50	41
COMP323 Operating System	100	72	50	45
COMP332 Web Page Development and E-comm	50	33	50	44
COMP342 PC System Architecture	100	72	50	44
COMP354 PC System and Peripherals & repair	100	79	100	88
COMP363 Project	150	150	150	132

1ST YEAR MARKS 695/1000

GRAND TOTAL 2198/3100

2ND YEAR MARKS 730/1100

RESULT PASS

3RD YEAR MARKS 773/1000

GRADE A

Checked by

Date of Issue: November 25, 2013

CONTROLLER OF EXAMINATIONS

- S For Sessional
- F For Final
- Passing Marks for Theory: 40%
- Passing Marks for Practical: 50%

Note: Errors and omissions excepted.

SYED ASIF SHAH  
ADVOCATE IN CHARGE

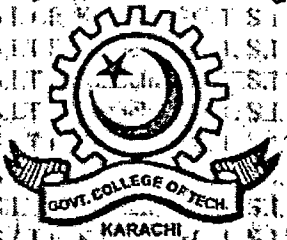
N<sup>o</sup>: 396

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

College Reg. No. 10/26

S.B.T.E. Reg. No. EVF/1264/2010-11

Government College of Technology, Karachi  
(Self Help Basis Programme)



PROVISIONAL CERTIFICATE

This is to certify that Mr. Qasim Shah

S/o Mr. Zahid Shah S.B.T.E. Seat No. 81850 has passed the

Three Years Course leading to the award of Diploma of Associate Engineer

in COMPUTER INFORMATION Technology Annual / Supplementary

Examination 20 13 Conducted by the SINDH BOARD OF TECHNICAL

EDUCATION, Karachi held in the month of July 20 13

Securing 2198 marks out of 3100

He bears a good moral character.

Prepared by \_\_\_\_\_ Checked by \_\_\_\_\_ Registrar

Dated: 18-08-2011



ENLISTMENT ORDER

**Annex 'D' (23)**

In the light of recommendations of Regional Selection Boards the following candidates, having domicile of Torghar District, who qualified ETEA test (conducted in February and November) for recruitment as constable in 2019 and subsequently selected by the said Boards after fulfillment of all the coddle formalities are hereby appointed as Constables, in BPS-07, ( Rs 10990-610-29290) against the vacant posts available in the District with effect from 26.12.2019, subject to verifications from concerned departments / units of their Academic and other documents including their character verifications. A constable who will found unlikely to prove an efficient police officer may be discharged at any time within 03 years of enrolment. Moreover, candidates namely Muhammad Shakeel at serial No.18, Muhammad Ishaq at serial No.30, Yousaf Khan at Serial No.76 and Abdul Wahid at serial No.89 are found different in age in their school certificates and CNICs as their age have been considered from their school certificates instead of CNIC, are responsible to get correct their age similar in both the documents at the earliest.

S. No.	ETE A Roll No.	Name	Father Name	CNIC No.	Constabulary Number allotted
1	06107	Meherban Shah	Mian Umer Shah	1360105171373	48
2	05046	Saeedullah	Abdul Sattar	1350298628991	16
3	05175	Abdul Haq	Fazal Rahim	1360105094131	51
4	00117	Gul Waris	Dil Ferooz Khan	1360105124271	54 ✓
5	00015	Siraj ul Islam	Gul Muhammad Khan	4210120824605	58 ✓
6	00013	Umer Zaid	Peer Muhammad Khan	1350284846807	59 ✓
7	00160	Anwer Said	Hakim Said	1360104964445	64 ✓
8	00041	Maqsood Khan	Nasarullah	1360105163707	69 ✓
9	00240	Amirullah	Muhammad Latif Khan	4240193729869	79 ✓
10	00074	Saeed Khan	Taj Mehmood	4220150065499	83 ✓
11	00070	Rizwanullah	Roshan Khan	1350245584905	85 ✓
12	00061	Hamid ur Rehman	Sultan syed	1350270207945	86 ✓
13	00073	Munir Memon	Momin Khan	1320276894693	89
14	00032	Abdul Hameed	Tarvas Khan	1360104960033	93
15	00225	Syed Mujeeb Shah	Baba syed	1320240897265	94
16	00205	Abdul Sattar	Muzammil Shah	1360105189393	108
17	00116	Hassid	Gul Nawab Syed	4240162770009	113
18	00115	Muhammad Shakeel	Dawar Khan	1350274011387	123
19	00119	Ahmed Wahid Shah	Sher Ali Shah	1360104927259	127
20	00219	Syed Hamidullah Shah	Mukarram Said	1360105115135	128
21	00172	Said Nabi	Zaid Muhammad Khan	4230132967675	137
22	00195	Fazalullah	Habibullah	1360105003651	145
23	00001	Rizwanullah	Muhammad Iqbal	1360105087353	149
24	00027	Muhammad Tahir Shah	Meherban Shah	4240124738563	152
25	00061	Syed Qasim Shah	Zahroon Shah	4220193122001	153
26	00026	Iqbal Khan	Iqbal ul Haq	1350107745733	154
27	00058	Gulzar Ishaq	Muhammad Hamid	1360104927259	157
28	00027	Fazal Khan	Khalid Khan	1350314134071	159
29	00005	Sahibullah	Khalidullah	4210182359553	163
30	00026	Muhammad Ishaq	Gul Muhammad Khan	1360104998653	165
31	00041	Iqbal Khan	Qazi Muhammad Yousaf	1310153611773	166
32	00025	Saeed Khan	Hazrat Sarwat	1350150461595	168

**SYED ASIF SHAH**  
HEAD OFFICE TORGHAR

*[Handwritten Signature]*



Government of Khyber Pakhtunkhwa  
District Accounts Office Tor Ghar  
Monthly Salary Statement (January-2021)

24



Personal Information of Mr SYED QASIM SHAH d/w/s of ZAHREEN SHAH

Personnel Number: 00946551 CNIC: 4220193122001

NTN:

Date of Birth: 12.02.1992 Entry into Govt. Service: 26.12.2019

Length of Service: 01 Years 01 Months 007 Days

Employment Category: Active Temporary

Designation: CONSTABULARY

80004944-GOVERNMENT OF KHYBER PAKH

DDO Code: TG4001-District Police Officer Tor Ghar

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance:

13,293.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 07

Pay Stage: 1

Wage type	Amount	Wage type	Amount
0001 Basic Pay	11,600.00	1000 House Rent Allowance	1,589.00
1210 Convey Allowance 2005	1,932.00	1300 Medical Allowance	1,500.00
1547 Ration Allowance	681.00	1567 Washing Allowance	150.00
1646 Constabulary R Allowance	300.00	1901 Risk Allowance (Police)	3,530.00
1902 Special Incentive Allowance	775.00	1923 UAA-OTHER 20%(1-15)	1,000.00
2168 Fixed Daily Allowance	2,730.00	2211 Adhoc Relief All 2016 10%	859.00
2224 Adhoc Relief All 2017 10%	1,160.00	2247 Adhoc Relief All 2018 10%	1,160.00
2264 Adhoc Relief All 2019 10%	1,160.00		0.00

Deductions - General

Wage type	Amount	Wage type	Amount
3007 GPF Subscription	-1,010.00	3530 Police wel:Fud BS-1 to 18	-232.00
4004 R. Benefits & Death Comp:	-450.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till JAN-2021: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 30,176.00 Deductions: (Rs.): -1,692.00 Net Pay: (Rs.): 28,434.00

Payee Name: SYED QASIM SHAH

Account Number:

Bank Details: , ,

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: 21300

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: qasim22.shah@gmail.com

SYED ASIF SHAH  
ADVOCATE HIGH COURT

# DOMICILE CERTIFICATE



DISTRICT TORGHAR, KHYBER PAKHTUNKHAWA

I, Mr. Syed Oasim Shah

**ANOK A' 17**

Father's Name, Zahiroon Shah

Declare that I have been permanently residing in District Torghar of Khyber Pakhtunkhwa and I am born of parents who are / were permanently domiciled in it. I further declare that I had not obtained Domicile Certificate of any other District / Province of Pakistan and express my intention to abandon my right of Domicile of other District / Provinces of Pakistan except District Torghar.

I belong to Village Kund Tilli, Hassan Zai

Tehsil: Kandar Hassan Zai District: Tor Ghar

I do solemnly affirm that above declaration is true to the best of my knowledge and belief.

*Signature of the Applicant*

Dated: 26/08/2014

Pursuant to the declaration dated: 26/08/2014 Filed by Mr. Syed Oasim Shah S/O Zahiroon Shah is hereby certified that the said Syed Oasim Shah is the permanent residents of District Torghar having belonged to it by birth/ settled in it.

I have satisfied myself from overleaf verification that the above declaration is true and certify accordingly.

No 9978 Dated 29/10/2014

**SYED ASIF SHAH**  
ADVOCATE

**COUNTERSIGNED**

**Deputy Commissioner**

**Torghar**

**Assistant Commissioner**  
(Tehsil Kandar Hassan Zai)  
Torghar

**Additional Assistant Commissioner**  
Kandar



Al-Naseeb Communication Centre, New Darband, Manshra,  
Ph: +92-997-580080, 0345-2190110



پولیس نمبر 24-5-1

### پیدائشی سرٹیفکیٹ کے لیے درخواست

نمبر: 260 / 2019 / 2019 / 19 / 26 / 19 / 26

1	پیدائشی سرٹیفکیٹ کے لیے درخواست	نمبر: 260 / 2019 / 2019 / 19 / 26 / 19 / 26	09-10-2019 05:00 PM
2	نام و سکونت اطلاع فراہم شدگی	پیدائشی سرٹیفکیٹ کے لیے درخواست نمبر: 260 / 2019 / 2019 / 19 / 26 / 19 / 26	
3	نمبر ایکٹ بزم (نمبر) دہلی (نمبر) آئی جی کے نوٹس	نمبر: 260 / 2019 / 2019 / 19 / 26 / 19 / 26	
4	پیدائشی سرٹیفکیٹ کے لیے درخواست	نمبر: 260 / 2019 / 2019 / 19 / 26 / 19 / 26	
5	پیدائشی سرٹیفکیٹ کے لیے درخواست	نمبر: 260 / 2019 / 2019 / 19 / 26 / 19 / 26	

پیدائشی سرٹیفکیٹ کے لیے درخواست نمبر: 260 / 2019 / 2019 / 19 / 26 / 19 / 26

اس کی ایک کاپی تعلقہ کے ضابطہ نمبر 14 میں شامل ہے۔

اس کی ایک کاپی تعلقہ کے ضابطہ نمبر 14 میں شامل ہے۔

اس کی ایک کاپی تعلقہ کے ضابطہ نمبر 14 میں شامل ہے۔

اس کی ایک کاپی تعلقہ کے ضابطہ نمبر 14 میں شامل ہے۔

**AYED ASIF SHAH**  
DIRECTOR

DISCIPLINARY ACTION

Anex C-27

I. Mr. Qamar Hayat Khan, District Police Officer, Torghar as competent authority of the opinion that Constable Syed Qasim Shah No.153 while posted at Police Lines, Judbah, has rendered himself liable to be proceeded against departmentally as you committed the following act/omission within the meaning under the Khyber Pakhtunkhwa, Police Rules, 1975 ( with amendment 2014).

SUMMARY OF ALLEGATION

Constable Syed Qasim Shah No.153 while posted at Police Lines, Judbah. An applicant / complainant Arbab Khan submitted an application to the W/PPO, KPK, Peshawar that you had issued cheque to complainant for amount Rs.11,20,000 but said cheque was dishonored to which case vide FIR No.293/2019 U/s 420/489-F/34 PPC PS Risala, District Karachi, South and you escaped from your legal arrest and the local police of PS Risala has initiated effort of 512 CrPc against you. on the receipt of letter vide No.1425/CPO/IA/C-Cell dated 26.08.2020 received from the office of W/PPO, KPK, Peshawar, You are under suspension and also charge Sheeted in the allegation mentioned above.

For the purpose of scrutinizing the conduct with reference to the above allegation, an Enquiry committee of the following is constituted.

DSP /Gul Zar Khan, DSP/Har is deputed as Enquiry Officer.

The Enquiry Officer/Committee shall in accordance under the provision of this above mentioned rules, provide reasonable opportunity of hearing to the accused, record finding and make within 25 days of the receipt of this order, recommendation as to punishment or take other appropriate action against the accused.

The accused shall appear in the departmental proceedings on the date, time and place fixed by the Enquiry Officer/Committee.

(Qamar Hayat Khan)  
District Police Officer,  
Torghar

No. 1335-20 PA, dated Torghar the 06/09/2020.

Constable Syed Qasim Shah No.153 while posted at Police Lines, Judbah, with the direction to submit his written statement to the Enquiry Officer, the receipt of the charge sheet/statement of allegations and also to appear before Enquiry Officer on the date, time and place fixed for purpose of departmental proceedings.

SYED ASIF SHAH  
ADVOCATE HIGH COURT

CHIC No.42201-931220-1

28

**CHARGE SHEET**

Mr. Qamar Hayat Khan, District Police Officer, Torghar as competent authority hereby charge you Constable Syed Qasim Shah No.153 while posted at Police Lines, Judbah, for the allegation explained in the attached statement of allegations.

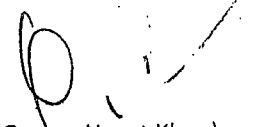
You appear to be guilty of misconduct under Khyber Pakhtunkhwa, Police Rules, 1975 (with amendment 2014) and have rendered yourself liable to all or any of the penalties specified in the said rules.

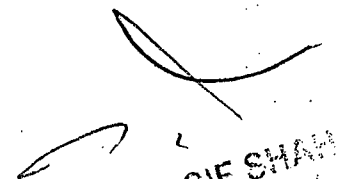
You are therefore directed to submit your written defense within (07) Seven days on receipt of the charge sheet to the Enquiry officer.

Your written defense, if any, should reach the enquiry office within the specified period, failing which it shall be presumed that you have no defense to put in hand and in the case ex-parte action shall follow against you.

Intimate whether you desire to be heard in person or otherwise.

Summary of allegation is also enclosed.

  
(Qamar Hayat Khan)  
District Police Officer,  
Torghar

  
SYED ASIF SHAH  
ADVOCATE HIGH COURT

ORDER

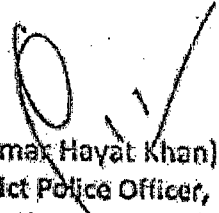
AMX 'H' 29

This order will dispose of the departmental enquiry initiated against Constable Qasim Shah No.153 while posted at Police Lines Judbahi, an applicant / complainant namely Arab Khan resident of Karachi submitted an application to the Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar in which stated that he had issued cheque to complainant for amount of RS.11,20,000 but the said cheque was dishonored to which a case vide FIR No.293/2019 u/s 420/489-F/34 PPC PS Risala, District Karachi, South was registered against above named constables. He escaped from his legal arrest and the local police of PS Risala has also initiated effort 512 Cr.P.C against him. On the receipt of letter vide No.1425/CPO/IA/C-Cell dated 26.08.2020 received from the office of Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar he was placed under suspension.

He was charge sheeted for the allegation mentioned above by the undersigned vide Memo No.1335-36/PA dated 16.09.2020 and enquiry was entrusted to Gul Zar Khan DSP/Hqr. He after conducting detailed enquiry into the allegations recommended him for major punishment in his report as he has been proved guilty for the allegations mentioned in the Charge sheet and statement of allegations. He was served with a Final Show Cause Notice in response to which he does not submit his written explanation and he also avoided appearing himself in OR that to prove himself innocent.

Therefore, in exercise of the powers vested in me under KPK Police Rules 1975 (with amended 2014), I, Qamar Hayat Khan District Police Officer, Torghar as a competent authority, am constrained to award him major punishment. Therefore, he is hereby awarded with a major punishment of "Dismissal from Service" with immediate effect.

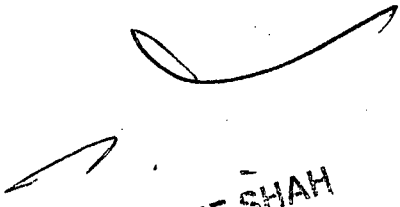
Order announced in his absence.

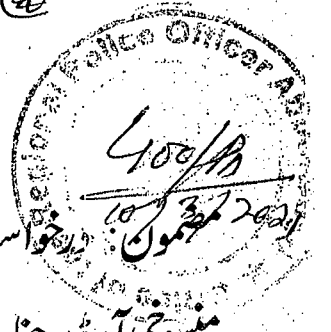
  
(Qamar Hayat Khan)  
District Police Officer,  
Torghar

OB No. 38  
Dated 4/10/21 2021

Copy of above is forwarded for information and necessary action to the:

1. Pay Officer, Torghar.
2. SRC Torghar.

  
SYED ASIF SHAH  
ADVOCATE HIGH COURT



بکھنور جناب DIG ہزارہ ڈویژن

درخواست بمراد بحالی کا نشیبیل قاسم شاہ کا نشیبیل بیلٹ نمبر 153

منسوخ آڈر جناب DPO تورغراڈر نمبر 38 OBNو38 مصدرہ 04 فروری 2021

جناب عالی درخواست ذیل عرض ہے

- 1- یہ کہ سائل کے خلاف کراچی میں زیر دفعہ 420/489-F/34 تھانہ رسالہ میں سائل کے غیر موجودگی FIR درج ہوا۔
  - 2- یہ کہ سائل FIR متذکرہ بالا کے بارے میں کوئی نہ تھا بلکہ سائل کو FIR کے بارے میں پولیس لائن تورغراڈر میں معلوم ہوا۔
  - 3- یہ کہ سائل کو بغیر سنے Dismissal from service کی سزا سنائی گئی۔
  - 4- یہ کہ سائل کو مقدمہ کا علم ہوا تو سائل نے معزرت عدالت میں حاضری اور عدالت جناب سے Acquit ہوا۔ آڈر لف ہے۔
  - 5- یہ کہ سائل نے کسی کو کسی قسم کا کائی چیک جاری نہیں کیا بلکہ مقدمہ عنوان سائل کے خلاف سازش تھا۔ سائل کو عدالت جناب نے باعزت بری کیا ہے۔
- استدعا ہے کہ سائل کو Service میں بحالی کا حکم صادر فرمایا جاوے۔

ارض

المرقوم 09 مارچ 2021

No. 597 / PA 2021  
Date 10-3-2021  
DPO

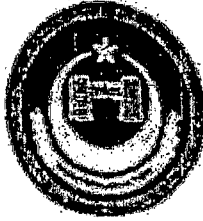
Par Farouze  
alazguith

Comments requested  
Ex  
10/03

SYED ASIF SHAM  
ADVOCATE HIGH COURT

XIth Civil Judge & Judicial Magistrate  
Karachi-South.

AMX J' (31)



OFFICE OF THE REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

☎ 0992-9310021-23

☎ 0992-9310023

✉ r.p.o.hazara@gmail.com

☎ 0345-9560689

NO: 9299 IPA DATED 06/05/2021

ORDER

This order will dispose off departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rules, 1975 submitted by Ex. Constable Qasim Shah No.153 of District Torghar against the order of punishment i.e. *dismissal from service* awarded by DPO Torghar OB No.38 dated 04.02.2021.

Brief facts leading to the punishment are that the appellant while posted at Police Lines, Judhak a complainant namely Arab Khan resident of Karachi submitted an application to the Provincial Police Officer Khyber Pakhtunkhwa Peshawar to the effect that the appellant had given cheque to the complainant amounting Rs. 1120,000 but the same was dishonored as a result case vide FIR No.293/2019 u/s 420/489-F/34 PPC PS Risala, district Karachi South was registered against the appellant. He escaped from his legal arrest and local Police of PS Risala initiated action u/s.512 CrPC against him.

The appellant was issued charge sheet alongwith summary of allegations and DSP Hqrs, Torghar was deputed to conduct formal departmental enquiry. The EO held the appellant responsible of misconduct. He was issued final show cause notice and called in OR however, neither he appeared before the competent authority nor submitted reply of the show cause. Consequently, DPO Torghar awarded him major punishment of dismissal from service. Hence, the appellant submitted this present appeal.

After receiving his appeal, comments of DPO Torghar were sought and examined/perused. The undersigned called the appellant in OR and heard him in person. After perusal of relevant record it has been noticed that the appellant was directly nominated in the FIR for several cheques of his issued in Karachi. The FIR was registered before his recruitment as a constable which he did not disclose at the time of recruitment. He got relief on out of court settlement otherwise he would have been convicted. Due to his evasive attitude, his appeal is being declined. Therefore, in exercise of the powers conferred upon the undersigned under Rule 11-A (a) of Khyber Pakhtunkhwa Police Rules, 1975 appeal of the appellant is hereby filed with immediate effect.

Mirza Niaz (PSP)

REGIONAL POLICE OFFICER  
HAZARA REGION, ABBOTTABAD

No. 9300 IPA, dated Abbottabad the 06/05/2021.

CC.

1. DPO Torghar for information and necessary action with reference to his office Memo No. 925/OB dated 09-04-2021. Service Roll and Fuji Nilisal containing enquiry file of the appellant is returned herewith for record.

SYED ASIF SHAH  
ADVOCATE HIGH COURT



Amir K. (32)

04.02.2021 / 001/NO.38

ان کے خلاف لاپتہ میں ذرا دیر سے 420/FIR F/34 کے ساتھ ساتھ ان کے پتے پر بھی FIR درج ہے۔  
ان کے خلاف ان کے اپنے پتے پر بھی FIR درج ہے۔ ان کے پتے پر بھی ان کی تصویریں مل سکتی ہیں۔  
ان کو تفریح سے Dismissal From Service کی جا رہی ہے۔  
ان کے خلاف ان کے پتے پر بھی FIR درج ہے۔ ان کے پتے پر بھی ان کی تصویریں مل سکتی ہیں۔

آرڈر لف ہے۔

ان کے خلاف ان کے پتے پر بھی FIR درج ہے۔ ان کے پتے پر بھی ان کی تصویریں مل سکتی ہیں۔  
ان کے خلاف ان کے پتے پر بھی FIR درج ہے۔ ان کے پتے پر بھی ان کی تصویریں مل سکتی ہیں۔

الحاضر

تاریخ: 31/05/2021

سید امجد علی شاہ

0348-9493224

دوکان

SEED ASIF SHAH





Ann 2/3

OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR

ORDER

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 Qasim Shah No. 153. The petitioner was dismissed from service by District Police Officer, Torghar vide OB No. 48, dated 01.02.2021 on the allegations that he while posted at Police Lines, Jadhali a complainant namely Arif Khan resident of Karachi submitted an application to the Provincial Police Khyber Pakhtunkhwa Peshawar to the effect that the petitioner had given cheque to the complainant amounting Rs. 11,20,000 but the same was dishonored as a result case vide FIR No. 293/2019 w/s 420/489-P/34 PPC Police Station Risala, district Karachi South was registered against the petitioner. He escaped from his legal arrest and local Police of Police Station Risala initiated action w/s 512 CrPC against him. The appellant was directly nominated in the FIR for several cheques of his issued in Karachi. The FIR was registered before his recruitment as a Constable which he did not disclose at the time of recruitment. His appeal was filed by Regional Police Officer, Hazara vide order No. 9299/PA, dated 06.05.2021.

Meeting of Appellate Board was held on 29.03.2022 wherein petitioner was heard in person. During hearing petitioner contended that he was acquitted on compromise basis by the court of XIth Civil Judge & Judicial Magistrate, Karachi-South vide order dated 15.02.2021.

Perusal of enquiry papers reveals that the allegations leveled against the petitioner has been established and the Enquiry Officer recommended him for major punishment. During hearing, petitioner failed to advance any plausible explanation in rebuttal of the charges. The acquittal from the court does not absolve the petitioner from the liability. The Board see no ground and reasons for acceptance of his petition, therefore, the Board decided that his petition is hereby rejected.

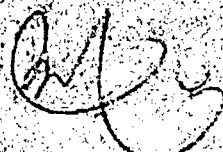
Sd/-

**SABIR AHMED, PSP**  
Additional Inspector General of Police,  
HQs: Khyber Pakhtunkhwa, Peshawar.

No. SI 797-803 722, dated Peshawar, the 14/6 2022.

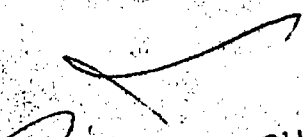
Copy of the above is forwarded to me:

1. Regional Police Officer, Hazara at Abbottabad. One Service Roll and one Fauji Missal containing enquiry file of the above named Ex-FC received vide your office Memo No. 18662, dated 13.08.2021 is returned herewith for your office record.
2. District Police Officer, Torghar.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. AIG/Legal, Khyber Pakhtunkhwa, Peshawar.
5. PA to Addl. IGP/HQs: Khyber Pakhtunkhwa, Peshawar.
6. PA to DIG/HQs: Khyber Pakhtunkhwa, Peshawar.
7. Office Supdt. E-IV, CPO Peshawar.

 05.04.22

**(IRFAN TARIQ) PSP**  
AIG/Establishment,

For Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

  
**SYED ASIF SHAH**  
ADVOCATE HIGH COURT

Annex M' 34

12880



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Option 2. Directly verify it from website <http://shc.gov.pk/cfms-dc.php> Document  
Code: DED89AEB6A2231D825099B58633E8103

IN THE COURT OF XIITH CIVIL AND JUDICIAL MAGISTRATE AT KARACHI-SOUTH

Case No. 3747 of 2019

Mr. Abrar Khan.....Complainant

Versus.

Syed Qasim Shah.....Accused

FIR NO. 293/2019  
U/S 420/489-F/512 PPC  
P.S. Risala

ORDER

15-02-2021

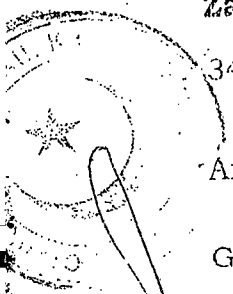
By this Order, I would like to dispose of application U/S. 345(2) Cr.P.C. and U/s. 345(6) Cr.P.C filed by complainant Abrar Khan S/O Shah Nawaz Khan. Notice of application was given to the ADPP for the State.

Heard arguments of both counsels and perused the record which indicates that both the parties have settled their matter outside the Court on the interventions of their well wisher and have patched up their dispute. I have inquired from complainant with regard to compromise. Complainant stated that he has forgiven accused persons namely **Syed Qasim Shah S/O Zahiroon Shah and Syed Naeem Shah S/O Syed Malik Shah.**

In view of above, I hereby permit them to compromise the matter under section 345(2) Cr.P.C and also acquit the accused persons **Syed Qasim Shah S/O Zahiroon Shah and Syed Naeem Shah S/O Syed Malik Shah** under section 345 (6) Cr.P. C.

Announced in open Court.

Given under my hand and seal of the court, on this 15th day of February, 2021.



**EYED ASIF SHAH**  
ADVOCATE HIGH COURT

**(Adil Hayat Sandhu)**

XIITH Civil Judge & Judicial Magistrate  
Karachi-South.

FROM ( )

PESHAWAR POLICE

12153-7/400



TO ( )

THE CAPITAL CITY POLICE OFFICER, PESHAWAR ( ) BY HAND  
 THE COMMANDANT, FRP, KHYBER PAKHTUNKHWA,  
 PESHAWAR ( ) BY HAND  
 THE COMMANDANT, ELITE FORCE, KHYBER PAKHTUNKHWA  
 PESHAWAR ( )  
 THE DPO, UPPER KOHISTAN, SWAT, HANGU, AHHOTTABAD, DIKHAJ, MARDAN,  
 KOHAT, SOUTH WAZIRISTAN, TANK, MANSEHRA, TORGHAR ( )

NO. S/ 6162 21, DATED PESHAWAR 12/11 2021 ( ) SUBJECT ( ) DEPARTMENTAL APPELLATE BOARD MEETING MEMO. THE FOLLOWING APPELLANTS OF YOUR UNIT DISTRICT MAY PLEASE BE INFORMED TO ATTEND THE DEPARTMENTAL APPELLATE BOARD MEETING IN CONNECTION WITH THEIR APPEALS/REVISION PETITIONS SCHEDULED TO BE HELD ON 16.11.2021 AT 11:00 AM UNDER THE CHAIRMANSHIP OF A/ESTABLISHMENT, KHYBER PAKHTUNKHWA IN CPO ( )

1. FC IMRAN KHAN NO. 2630 OF CCP PESHAWAR
2. EX-FC RAJA WAQAS NO. 940 OF DISTRICT UPPER KOHISTAN
3. EX-FC HAIDER NO. 2041 OF FRP HQRS: PESHAWAR
4. EX-FC AZIZ AHMAD NO. 2638/1225 OF DISTRICT SWAT
5. EX-FC SHAHBAZ KHAN NO. 167 OF DISTRICT HANGU
6. FC IBRAR GUL NO. 1528/1440 OF FRP HQRS: PESHAWAR
7. FC SHAHID NO. 1296 OF DISTRICT ABBOTTABAD
8. EX-FC TAUSEEF ALAM NO. 3111 OF CCP PESHAWAR
9. EX-FC NAEEM KHAN NO. 1156 OF CCP PESHAWAR
10. EX-FC SAADAT ALI NO. 352 OF CCP PESHAWAR
11. EX-FC MUHAMMAD ARSHAD NO. 1629 OF DISTRICT DIKHAJ
12. EX-FC BAHAR ALI NO. 925 OF DISTRICT MARDAN
13. EX-FC ADNAN KHAN NO. 816 OF DISTRICT KOHAT
14. EX-FC ABDUL JALIL NO. 1368 OF DISTRICT SOUTH WAZIRISTAN
15. EX-FC HIDAYAT ULLAH NO. 222 OF DISTRICT TANK
16. FC IMTIAZ-UL-HASSAN NO. 1248 OF DISTRICT DIKHAJ
17. FC UZAIR DIN MUHAMMAD NO. 364 OF DISTRICT MANSEHRA
18. EX-FC QAISER SHAH NO. 996 OF DISTRICT KOHAT
19. EX-FC ASIF KHAN NO. 384 OF DISTRICT SOUTH WAZIRISTAN
20. EX-FC SHARIF ULLAH (EX-LEVY SEPOY) OF DISTRICT SOUTH WAZIRISTAN
21. EX-FC NOOR ASLAM NO. 23/1166 OF DISTRICT SOUTH WAZIRISTAN
22. EX-FC EJAZ NO. 2551 OF DISTRICT SOUTH WAZIRISTAN
23. EX-FC SHEIKH QANDON NO. 1031 OF DISTRICT SOUTH WAZIRISTAN
24. FC HIDAYAT ULLAH NO. 881/98 OF DISTRICT KOHAT
25. EX-FC HAZRAT UMAR NO. 2861 OF DISTRICT SOUTH WAZIRISTAN
26. EX-FC AMSHED NO. 813 OF DISTRICT KOHAT
27. EX-FC ASFANDYAR NO. 1312 OF DISTRICT KOHAT
28. EX-FC QASIM SHAH NO. 153 OF DISTRICT TORGHAR
29. EX-FC SHEHZAD SHAH NO. 2398 OF ELITE FORCE
30. FC HESAN NO. 936 (THE THIEF HC) OF DISTRICT DIKHAJ
31. EX-HC SHAHIZAD SHAH NO. 756 OF DISTRICT ABBOTTABAD

*(Signature)*  
**SMED ASIF SHAH**  
 ADDITIONAL HIGH COMMISSIONER

*(Signature)*  
**REGISTRAR,**

FOR INSPECTOR GENERAL OF POLICE,  
 KHYBER PAKHTUNKHWA, PESHAWAR.

D.S. 4162-45 21,

COPY OF ABOVE IS FORWARDED FOR INFORMATION AND NECESSARY ACTION

TO THE:  
 AIG LEGAL, CPO PESHAWAR.  
 DSP ADMIN, CPO PESHAWAR.  
 BA TO AIG ESTABLISHMENT, CPO.

U/KHAN \_\_\_\_\_ DC \_\_\_\_\_  
12/11 \_\_\_\_\_ S/INVEST \_\_\_\_\_  
12/11 \_\_\_\_\_ DC \_\_\_\_\_

36



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
HYBER PAKHTUNKHWA  
Central Police Office Peshawar

No. S/ *1472* /21, dated Peshawar on *29/11/21*

To: The Regional Police Officer,  
Hazara at Abbottabad.

Subject: REVISION PETITION (EX-FC OASIM SHAH NO. 153)

Memo:

Please refer to your office Memo: No. 18662, dated 13-08-2021

Departmental Appellate Board meeting in connection with appeals of HCs/FCs was held on 16.11.2021 under the Chairmanship of the AIG/Establishment, Hyber Pakhtunkhwa, Peshawar wherein Ex-FC Qasim Shah No. 153 was appeared and heard in person. During hearing petitioner contended that he was acquitted on compromise basis by the court of XIIth Civil Judge & Judicial Magistrate, Karachi-South vide order dated 15-02-2021.

It is, therefore, requested that an attested report regarding court decision may please be sent to proceed further in the matter.

Scanned with CamScanner

*[Handwritten signature]*

37



OFFICE OF THE DISTRICT POLICE OFFICER TORGHAR

☎ 0997-920202

📠 0997-920202

✉ [dpo.torghar@gmail.com](mailto:dpo.torghar@gmail.com)

☎ 0344-9688656

NO: 1191 /GB DATE 09/12/2021


To: The Regional Police Officer,  
Hazara Region, Abbottabad.

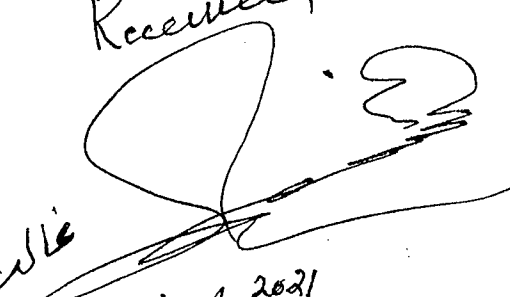
Subject: REVISION PETITION (EX-FC QASIM SHAH NO.153)

Memo:

Kindly refer to Provincial Police Officer, Khyber Pakhtunkhwa,  
Peshawar Letter No.4477/21 dated 29.11.2021.

It is submitted that the attested copy of the court order vide  
case No.8747 of 2019 in respect of Ex-Constable Qasim Shah No.153 is sent  
herewith for kind perusal please.

  
District Police Officer,  
Torghar

Received  
  
10/12/2021

  
EYED ASIF SHAH  
ADVOCATE HIGH COURT

DAILY "AWAZ-E-SUBH" PESHAWAR

ABC  
Certified

بانی: سید محمد آواز شاہ

# آواز

روزنامہ

پیشوا  
پتھان

چیف ایڈیٹر: محمد عابد

جلد 7، نمبر 1، دسمبر 2019، 04 جمادی الاول 1441، قیمت 10 روپے، شمارہ 191

## اظہار تعلق

میں سید قاسم شاہ ولد سید طاہرون شاہ، قومی شناختی کارڈ نمبر 1-9312200-42201، اشتہار پڈا کے ذریعہ ہر خاص و عام کو اور تمام اداروں کو مطلع کرتا ہوں بینک اسلامی، پتیل پارہ کراچی بزنس میں کھولنے کے اکاؤنٹ نمبر 1067-00021940001 جو کہ سید قاسم شاہ کے نام پر کھولا گیا ہے یہ اکاؤنٹ یوگس اور فیک اکاؤنٹ ہے۔ یہ اکاؤنٹ میں نے نہیں کھولا میرے شناختی کارڈ پر بینک کے عملے نے جعلی اکاؤنٹ کھولا ہے جس میں دستخط میرے نہیں ہیں لہذا میں اس اکاؤنٹ سے مکمل طور پر لاتعلق کا اظہار کرتا ہوں۔

اشتر سید قاسم شاہ  
نمبر 0341-0028319

7  
SYED ASIF SHAH  
HIGH COURT

Amor n° (40)

NEUROSURGEON

**DR. NAZIR ALVI**

MBBS (Gold Medalist)

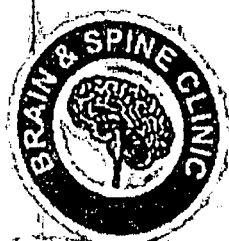
MCPS

FCPS (Neuro)

ASSISTANT PROFESSOR

King Abdullah Teaching

Hospital Mansehra



PMDC # 9138-N

ڈاکٹر نذیر علوی

ایم بی بی ایس (گولڈ میڈلسٹ)

ایم سی پی ایس

ایف سی ایس (نیورولاجی)

اسسٹنٹ پروفیسر

نگ عبداللہ ٹیچنگ ہسپتال، مانسہرا

Name

*Handwritten name*

Age

*72*

Sex

*♂*

Date

*24/1/2021*

*LA eva 2 wks*

*Depressant*

*OT 5/10/21*

*Tab Lanplat plus 75/75*

*Tab Past 10mg*

*Tab Ceregin 150*

*Tab Azmac*

*Tab Codopin 5mg*

*Tab Liorex 1/2 + 1/2*

NOT VALID FOR COURT

Opposite Emergency Gate KATH Mansehra  
Ph: 0333-5956775



33

Peshawar Edition

# Daily LEAD Pakistan

ABC Certified

Tuesday

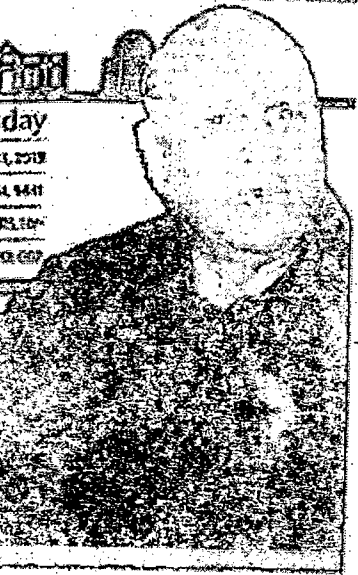
DECEMBER 14, 2019

JAMHURIYAT-UL-AWZAL 64, 6441

PAGES 8, FREE PRESS 100

REGD NO. 1508-B, VOL. X, NO. 609

Read to Lead



Central Punjab  
Lift Qaid-e-Azam  
Trophy title



Opposition is not doing politics of  
national interests but of personal  
and political gains

## PUBLIC NOTICE

It is hereby informed to all concerns that some unknown have opened an Fake Account in Bank Islami, Patel Para Branch, Karachi, Account No.1067-00021940001 on my name (Syed Qasim Shah). I am informing to all through this notice that I have not opened any of the above said account and dont have any relation with this account. For this pupose someone used my C.N.I.C. wrongly and opened this fake and bogus account.

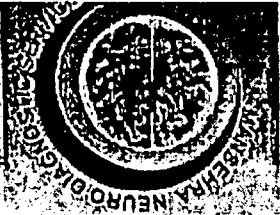
I, therefore, request a will fully enquiry of this account, this account is unknown account and I dont have any information for said account.

Kindly complete enquiry of this said account as soon as possible. So, Mr. Qasim Shah will not face any difficulty in present and future. I will fully coordinate in legal proceeding about this bougus account.

(Syed Qasim Shah)  
CNIC No.42201-9312200-1  
Mobile # 0341-0028319 - 0341-0285063.

SYED ASIF SHAH  
ADVOCATE HIGH COURT

41



# MANSEHRA

Neuro Diagnostic Services  
C.T scan

Ref# \_\_\_\_\_

Date \_\_\_\_\_

Patient Name: \_\_\_\_\_

*S. P. W.*

Sex/ \_\_\_\_\_

Ref:By// \_\_\_\_\_

CT BRAIN without IV Contrast

Technique; Trans axial slices through the brain obtained from base of skull to the vertex having slices thickening 4-8mm.

FINDINGS:

No evidence of Intra and extra axial mass or hemorrhage. No evidence of recent or remote infarct. Ventricular system is normal. Intra and extraaxial CSF spaces are normal.

No mass effect or mid line shift. Grey and white matter differentiation is normal.

Pituitary gland and posterior fossa contents are normal.

Both orbits, mastoids and rest of the cranial bones appear normal.

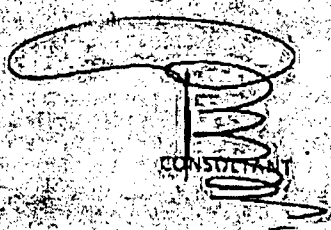
Visualized paranasal sinuses appear normal.

Impression:

*Left Parietal Infarct*

*[Signature]*

SYED ASIF SHAH  
ABOTTABAD HIGH COURT



*Thanks For Referral & Confidence In Us*

Al-Raheem Plaza, Opp. King Abdullah Teaching Hospital, Abbottabad road, Mansehra.  
Tel: 0997-304235, Mob: 0300-9117596

AD FOR COURT  
ncy Gate

*1/1  
2/1  
2*



"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

Regd  
No.

TB ALA Bad

APPEAL No. 661 of 20 22

Syed Qasim Shah

Appellant/Petitioner

Versus

IGP Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner Syed Qasim Shah S/O  
Zahiroon Shah R/O Kund Tilli Hassan Zai  
teh ~~Teh~~ Kanday Hassan Zai Dist. Torghar  
Ex Police Constable No 153 Torghar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 14-6-22 at 8:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp court  
ALABAD.



Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No. *89*

*TR A/A*

APPEAL No. *661* of 20 *22*

*Syed Qasim Shah*

Appellant/Petitioner

Versus

*IQP Peshawar*

RESPONDENT(S)

*Comised* Syed Asif Shah  
Notice to Appellant/Petitioner (Advocate)

*High Cour* *Per Mansehra*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *14-6-22* at *8:00 AM*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

*at camp court  
A/Abad*

Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

JUDICIAL COMPLEX (OLD), KHYBER ROAD,

PESHAWAR.

Regd  
No.

TB A/Abad

APPEAL No..... 661 ..... of 20 22

Syed Qasim Shah

Appellant/Petitioner

Versus

K.P. Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner

Syed Qasim Shah S/O

Zahiroon Shah R/O Kund Tilli Hassan Zai

teh ~~Teh~~ Isandar Hassan Zai Dist Torghar

Ex Police Constable No 153 Torghar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 14-6-22 at 8:00 AM

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at camp Court

A/Abad.



Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No. *leg*

*TR A/A*

APPEAL No. *661* of 20 *22*

*Syed Qasim Shah*

Appellant/Petitioner

Versus

*IGP Peshawar*

RESPONDENT(S)

Notice to Appellant/Petitioner *counsel* *Syed Asif Shah*  
*(Advocate)*  
*High Court* *Mansehra*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *14-6-22* at *8:00 AM*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

*at camp court*  
*AIABad*

*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
**JUDICIAL COMPLEX (OLD), KHYBER ROAD,**  
**PESHAWAR.**

*AD 2022*

SB

Appeal No. 661 of 2022  
Syed Qasim Shah Appellant/Petitioner  
 Versus  
J-G-P KPK Pesh. Respondent  
 Respondent No. (2)

Notice to: Divisional Inspector General of  
Police Hazara Division Abbottabad.

**WHEREAS** an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 26/12/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition. ✓

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....  
 Day of Oct 2022

For Reply

*[Signature]*

Registrar,  
 Khyber Pakhtunkhwa Service Tribunal,  
 Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
 2. Always quote Case No. While making any correspondence.



"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

AD 441

661

SB

Appeal No. .... of 20 22

Syed Qosim Shah

Appellant/Petitioner

Versus

G-G-P KPK Pesh.

Respondent

Respondent No. (3)

Notice to: —

District Police Officer, District  
Torghar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....26/12/2022.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this..... 26/12

Day of..... Oct ..... 2022

For Reply



Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
**JUDICIAL COMPLEX (OLD), KHYBER ROAD,**  
**PESHAWAR.**

No.

661

SB

Appeal No. Syed Qasim Shah of 20 <sup>22</sup>  
 Appellant/Petitioner

I-G-P <sup>Versus</sup> KPK Pesh

Respondent

(1)

Respondent No.

Notice to:

Inspector General of Police KPK Pesh.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 26/12/2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. .... dated .....

Given under my hand and the seal of this Court, at Peshawar this 26th

Day of Oct 20 22

For Reply  
02/11/2022

Registrar,

**Khyber Pakhtunkhwa Service Tribunal,**  
**Peshawar.**

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
  2. Always quote Case No. While making any correspondence.