

24.10.2022

Appellant present through representative.

Muhammad Jan, learned District Attorney for respondents present.

Bench is incomplete and lawyers are on strike, therefore, case is adjourned to 21.11.2022 for arguments before D.B at Camp Court, D.I.Khan.



(Rozina Rehman)  
Member (J)  
Camp Court, D.I.Khan

26/07/2022

Due to summer vacation

come for 27/09/2022

  
Reedy

27<sup>th</sup> September, 2022

Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he is not prepared for arguments today. Adjourned. To come up for arguments on 24.10.2022 before the D.B at Camp Court D.I.Khan.



(Salah Ud Din)  
Member (Judicial)  
Camp Court D.I.Khan



(Kalim Arshad Khan)  
Chairman  
Camp Court D.I.Khan

24.01.2022


Tour is Cancelled, therefore, case is adjourned to  
23.05.2022 for the same as before.

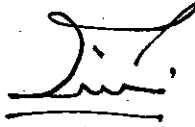
  
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23.05.2022

Learned counsel for the appellant present. Mr. Muhammad Ramzan, Litigation Officer alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Para-wise comments on behalf of respondents submitted, which are placed on file and copy of the same handed over to learned counsel for the appellant. Adjourned. To come up for arguments on 26.07.2022 before the D.B at Camp Court Swat.


  
(Rozina Rehman)  
Member (J)  
Camp Court D.I.Khan


  
(Salah-ud-Din)  
Member (J)  
Camp Court D.I.Khan

30<sup>th</sup> June 2022

~~Counsel for the appellant~~ present. Mr. Farhaj Sikandar, District Attorney for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the case. Let it be fixed on the date already fixed on 26.07.2022 for arguments before D.B at camp court D.I.Khan.

  
(Mian Muhammad)  
Member(E)

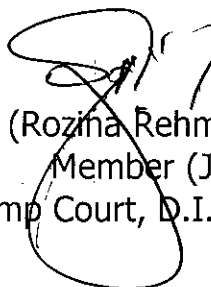
  
(Kalim Arshad Khan)  
Chairman  
Camp Court D.I.Khan

28.10.2021

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notice be issued to respondents for submission of written reply/comments in office within 10 days of the receipt of notices, positively. If the reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 14/12/21 before D.B at Camp Court D.I.Khan.

Appellant Deposited  
Security Process Fee  
8/11/21


  
(Rozina Rehman)  
Member (J)  
Camp Court, D.I.Khan


14.12.2021

Counsel for appellant present.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Notices be issued to the respondents with direction to furnish reply/comments within 10 days of the receipt of notice in office, positively. To come up for arguments on 24.01.2022 before the D.B at Camp Court, D.I.Khan.

  
(Rozina Rehman)  
Member (J)

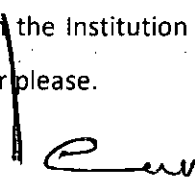

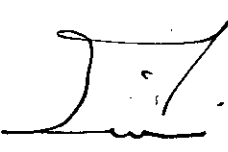

  
Chairman  
Camp Court, D.I.Khan

Form- A

FORM OF ORDER SHEET

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

Case No. - 15908 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/12/2020	<p>The appeal of Mr. Abdul Waheed received today by post through Sheikh Iftikhar ul Haq 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-		<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>24.3.2021</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
24.03.2021		<p>Mr. Shaikh Iftikhar-ul-Haq, Advocate, for appellant present and stated that other appeals of similar nature are pending adjudication before the Larger Bench and are fixed on 29.06.2021, therefore, sought adjournment. Adjourned. To come up for Preliminary arguments on 26.07.2021 before S.B at Camp Court, D.I.Khan.</p> <p style="text-align: right;"> (SALAH-UD-DIN) MEMBER (JUDICIAL) CAMP COURT D.I.KHAN</p> <p><i>26.7.21</i></p> <p><i>Due to COVID-19, The case is adjourned to 28.10.21 for hearing.</i></p> <p style="text-align: right;"></p>

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

15908  
Service Appeal No. \_\_\_\_\_/2020

Abdul Waheed

**VERSUS**

Inspector General of Police and others.

**SERVICE APPEAL**

**INDEX**

S.No	Particulars of the Documents	Annexure	Page
1.	Grounds of Service Appeal and affidavits	--	1-5
2.	Copy of FIR	A	6-
3.	Copies of judgment along with complete documents	B	7-51
4.	Copy of SSC certificate	C	52-53
5.	Copy of the impugned order 12/08/2010	D	54-
6.	Copy of the departmental appeal	E	55-57
7.	Copies of the revision petitions along with postal receipt t	F	58-65
8.	Wakalatnama	--	66-

Date: 05/12/2020

Yours Humble Appellant

  
Abdul Waheed

Through Counsel,

  
Sheikh Iftikhar ul Haq  
Advocate High Court

(1)

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL CAMP COURT DERA ISMAIL KHAN**

Service Appeal No. \_\_\_\_\_/2020

**Abdul Waheed** son of Shaista Khan Caste Kundi, r/o Gul Imam  
Tehsil & District Tank, Ex-Cook/Constable No. 74 Police  
Department, District Tank. Cell#0315-9880809

**Appellant**

**Versus**

1. Provincial Police Officer (IGP), Khyber Pakhtunkhwa,  
Peshawar.
2. Regional Police Officer (DIG), Tank/Dera Ismail Khan  
Region.
3. The District Police Officer, Tank.

.....**Respondents**

**SERVICE APPEAL UNDER SECTION 4 OF THE KPK SERVICES  
TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER  
DATED 12/08/2010 VIDE WHICH THE SERVICES OF THE  
APPELLANT HAD BEEN DISMISSED FROM THE DATE OF  
INITIAL APPOINTMENT I.E. 24/04/2010 (RETROSPECTIVE  
EFFECTS) AND QUA THE SILENCE OF APPELLANT AUTHORITY  
(DIG) ON THE DEPARTMENTAL APPEAL OF THE APPELLANT  
AND ALSO UPON THE SILENCE OF REVISIONAL AUTHORITY  
(IGP) ON THE REVISION PETITION OF THE APPELLANT, BY  
EXPLAINING THAT THE APPELATE AUTHORITY (DIG) AND  
REVISIONAL AUTHORITY (IGP) DID NOT DECIDED THE  
DEPARTMENTAL APPEAL OF THE APPELLANT, MEANING  
THEREBY REJECTION OF THE DEPARTMENTAL APPEAL AS  
WELL AS REVISION PETITION.**

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**PRAYER**

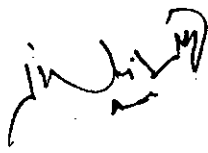
On acceptance of the instant Service Appeal the impugned order dated 12/08/2010 issued by the District Police Officer Tank and also against the order of non-deciding of the departmental appeal by the appellate authority (DIG) and the revision by (IGP) meaning thereby rejection may please be set at not and the void ab initio order of the dismissal from retrospective effects may please be set aside and the appellant may kindly be reinstated into service with all back benefits.

Respectfully Sheweth:-

The Appellant most respectfully submits as under:-

**BRIEF FACTS:**

1. That the appellant was appointed as Cook on 24/04/2010 in Police Department District Tank.
2. That the appellant performed his duties to the entire satisfaction of his superiors. During service the appellant was falsely implicated in case FIR No. 560 dated 19/09/2010 u/s 420,468,471 PPC registered at P.S Tank on the allegation that the appellant had submitted fake documents. Copy of FIR is annexed as **Annexure-A**.
3. That after conclusion of trial the learned trial court i.e. Judicial Magistrate Tank was pleased to acquit the appellant from the charges leveled against him vide judgment dated 25/09/2013. Copies of judgment along with complete documents are jointly annexed as **Annexure-B**.
4. That actually the appellant passed the SSC exam from the BISE Peshawar in session 1990 but inadvertently or deliberately verified the SSC certificate from BISE Bannu. Copy of SSC certificate is annexed as **Annexure-C**.
5. That on the above stated allegation of alleged fake documents, the appellant was dismissed from service on 12/08/2010 by the District Police Officer Tank vide order No.





(3)

OB-1295 dated 12/08/2010. Copy of the order dated 12/08/2010 is annexed as **Annexure-D**.

6. That after the honourable acquittal, the appellant submitted departmental appeal before the appellate authority (DIG) on 27/02/2016 which was not decided and even did not communicate any result of the above mentioned departmental appeal. Copy of departmental appeal is annexed as **Annexure-E**.
7. That the appellant, feeling aggrieved by not deciding and by not communicating any response of the departmental appeal, preferred a revision petition to the respondent#1 (IGP) and respondent#2 (DIG) on 03/09/2020 which were also not decided by the respondents. Copies of both the revision petitions along with postal receipts are annexed as **Annexure-F**.
8. That the appellant being aggrieved person, the instant service appeal is being filed, inter alia, on the following grounds.

**GROUND:**

- a. That the impugned order dated 12/08/2010 issued by the respondent#3 is against law, facts, natural justice, void ab initio being from the retrospective effects, hence, liable to be set aside.
- b. That the allegation of submitting fake documents is baseless and false, hence, the impugned dismissal order is not sustainable because the appellant has passed the SSC exam from BISE Peshawar and the respondent had been procured their report from BISE Bannu.
- c. That it is pertinent to mention here that the appellant has not been given a single chance of personal hearing, hence,

*[Handwritten signature]*

the appellant condemn unheard which is against law and service rules.

- d. That no charge sheet, initial show-cause notice, final show cause notice and statement of allegations were issued against the appellant, in short no inquiry whatsoever had been conducted in the case of appellant, hence, the impugned dismissal order is against the norms of natural justice and liable to be set aside.
- e. That the impugned dismissal order is void ab initio, thus, no limitation is run in the case of appellant. Moreover, during this period, the appellant remained seriously ill, similarly the wife as well as children of appellant also suffered severe diseases and as a result of which the pecuniary position of the appellant became so weak that the appellant was unable to pursue his case.
- f. That the appellant is a poor fellow having family with children and there is no earning hand except the service of appellant, hence, the service of appellant is liable to be reinstated along with all back benefits.
- g. That counsel for appellant may kindly be allowed to raise additional grounds at the time of arguments.

**It is therefore, humbly prayed that on acceptance of the instant Service Appeal the impugned order dated 12/08/2010 issued by the District Police Officer Tank and also against the order of non-deciding of the departmental appeal by the appellate authority (DIG) and the revision by (IGP) meaning thereby**

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A

(5)

rejection may please be set at not and the void ab initio order of the dismissal from retrospective effects may please be set aside and the appellant may kindly be reinstated into service with all back benefits.

Date: 05/12/2020

Yours Humble Appellant

*Abdul Waheed*

**Abdul Waheed**

Through Counsel,

*Sheikh Iftikhar ul Haq*

**Sheikh Iftikhar ul Haq**  
Advocate High Court

**AFFIDAVIT**

I, **Abdul Waheed** son of Shaista Khan Caste Kundi, r/o Gul Imam Tehsil & District Tank, do hereby solemnly affirm and declare on oath that contents of above Service Appeal are true & correct to the best of my knowledge and that nothing has been concealed from this Honourable Court.

Dated: 05/12/2020

*Abdul Waheed*

**DEPONENT**

Identified by

*Sheikh Iftikhar ul Haq*

Sh: *Abdul Waheed*



(6)

عسکر قریب  
(1)

فارم نمبر ۲۳-۵

# ابتدائی اطلاعی رپورٹ

Ann - "A"  
یہ فارم نمبر ۲۳

EXPW3/10

24/2/12

مذکورہ بیان نسبت محرم قابل دست اندازی پولیس رپورٹ شدہ زیر دفعہ ۱۵۴ مجموعہ ضابطہ موجودہ درجہ ضلع رانڈ

**Qaiser Rahim**  
Senior Civil Judge/Judicial  
Magistrate, Tank

تاریخ وقف وقوعہ ۱۱/۱۰/۲۰۱۱

56033

تاریخ وقت رپورٹ	۳۰/۱۰/۲۰۱۱	تاریخ وقت وقوعہ	۱۱/۱۰/۲۰۱۱
نام و سکونت اطلاع دہندہ مستفیض	محمد سعید	پتہ اطلاع دہندہ	۵۴ DP - ۵۴
مختصر کیفیت مجرم (موقوفہ) حال اگر کچھ لیا گیا ہو		پتہ مجرم	PPC 4120-468-471
جائے وقوعہ قاصد تھانہ سے اور سمت دستور پولیس سٹیشن	شمال	مقام وقوعہ	شمال
نام و سکونت ملزم	محمد سعید	مقام وقوعہ	شمال
کارروائی جو تفتیش کے تعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کرو		مقام وقوعہ	شمال
تھانہ سے روانگی کی تاریخ وقت		مقام وقوعہ	شمال

ابتدائی اطلاع نیچے درج کروا کر فارم نمبر ۲۳-۵ فارم نمبر ۲۳-۵ کو سیکرٹری پولیس  
کے پاس دیا گیا ہے۔ سیکرٹری پولیس نے اس پر ایک رپورٹ لکھی ہے جس میں مذکورہ  
مذکورہ بیان کے مطابق اطلاع دہندہ نے اطلاع دی ہے کہ وہ ایک شخص کو  
اپنے گھر پر لایا ہے جس کا نام محمد سعید ہے۔ اس شخص کو وہ ایک گھر پر لایا  
ہے جس کا پتہ ۵۴ DP - ۵۴ ہے۔ اس شخص کو وہ ایک گھر پر لایا ہے جس کا  
پتہ ۵۴ DP - ۵۴ ہے۔ اس شخص کو وہ ایک گھر پر لایا ہے جس کا پتہ ۵۴ DP - ۵۴ ہے۔

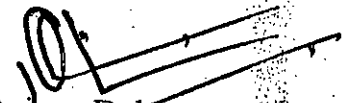
Qaiser Rahim  
Senior Civil Judge/Judicial  
Magistrate, Tank  
9.9.10

RECEIVED  
Office of the Senior  
Magistrate, Tank  
TANK, DISTRICT  
TANK, PUNJAB

IN THE COURT OF MR. QAISER RAHIM SENIOR CIVIL JUDGE/JUDICIAL MAGISTRATE EMPOWERED U/S 30 Cr.P.C, TANK.

Order ----01  
21.10.2010


Complete challan submitted today. It should be registered in the relevant register. Accused absconding. Summon should be issued to SW. File to come up for statement of SW on 12.11.2010

  
Qaiser Rahim,  
Senior Civil Judge  
Tank

Handwritten notes in Urdu on the left margin, including the name 'Qaiser Rahim' and other illegible text.

SPP برائے سرفارحاجت ملزم معذور ہے گواہ تلاش  
باوجود سمن کے غیر حاضر ہے وارنٹ گرفتاری بلا ضمانت  
نیام گواہ تلاش جاری ہو۔ مثل برائے شہادت گواہ تلاش

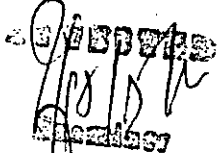
5-2  
12-11-10

  
14 12 / 10  
سینئر سول جج ٹانک

**ORDER NO.03**  
14.12.2010

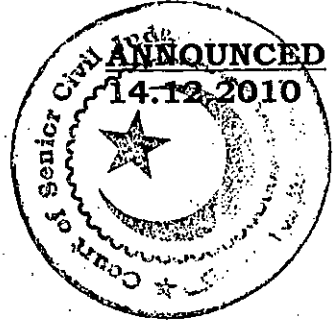
DPP for the state present. Accused Abdul Waheed is absconding. Constable Muhammad Yousaf No 33 present and his statement recorded as SW-1

DPP for the state stated that the prosecution relies upon the evidence recorded up till now and doesn't want to produce further evidence. He further stated that further evidence will be produced after arrest of the accused Abdul Waheed. In this regard statement of the DPP also recorded which placed on file. Hence he is declared proclaimed offender. Perpetual

  
Qaiser Rahim  
Senior Civil Judge  
Tank

(0)

Warrant of Arrest be issued against the accused **Abdul Wahid Son of Shaista Khan Caste Kundi R/O Gul Imam Tehsil & District Tank** through District Police Officer Tank with the direction to enter his name in the register of Proclaimed Offenders. Copy of the Perpetual Warrant be also sent to SHO concerned for compliance. Case Property be kept intact till the arrest of accused in the instant Case. File be consigned to General Record Room after completion.



*Qaiser Rahim*  
**QAISER RAHIM**  
Senior Civil Judge,  
Tank  
**SENIOR CIVIL JUDGE**  
**TANK**

*[Signature]*  
**SENIOR CIVIL JUDGE**  
Tank

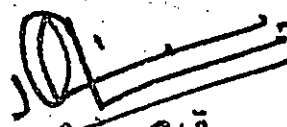


0-3  
27/6/11 App for the state present. Accused on bail present. Formal charge framed upon the accused & which he claims trial. Mr Rashid Ullah Advocate submitted vakalatnama on behalf of the accused. Summons should be issued to all the pws. File to come up for prosecution evidence on 08/09/2011.

  
Qaiser Rahim  
Senior Civil Judge/Judicial  
Magistrate, Tank

SPP برائے ریکارڈ حلف۔ ملزم بل فہانت  
حلف۔ گواہان باوجود سمن کے غیر حلف  
واردت گرفتاری بلا فہانت بنام لو  
معد سبقت لوٹس جاری ہوں۔۔۔  
برائے شہادت استغاثہ مورخ

0-4  
08-9-11

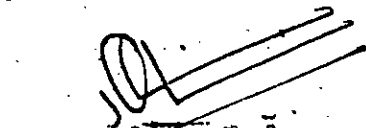
15-9-11  
  
Senior Magistrate  
Tank  
JUDGE  
Magistrate of the District  
Tank



State vs. Abdul Wakeed

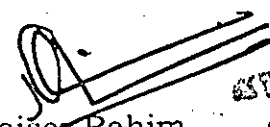
Or-----05  
15.09.2011

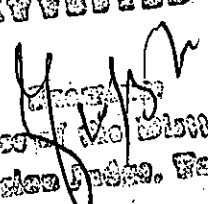
Spp for the State present. Accused on bail present. PWs absent, Inspite NBW. Fresh NBW should be issued against PWs. Monthly Pay of the PWs be hereby attached to this Court for the Month of September 2011. Notice of attachment be issued to Pay officer DPO, office Tank. File to come up for attendance and prosecution evidence on 28-09-2011.

  
Qaiser Rahim  
Senior Civil Judge  
Tank

Or-----06  
28.09.2011

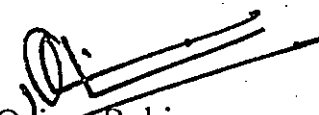
Dy: PP for the State present. Accused on bail along with his counsel present. PWs Abdul Ghafar and Akhtar Munir HC present and submitted an application for release of salary for the month of September 2011 which was attached to this Court. Application is accepted and their Monthly pay is released for the month of September 2011. Counsel for the accused requested for an adjournment. Request accepted and case is adjourned for the date fixed. Remaining PWs absent. NBW should be issued against remaining PWs. PP given to present PWs. File to come up for attendance and prosecution evidence on 22.10.2011.

  
Qaiser Rahim,  
Senior Civil Judge  
Tank

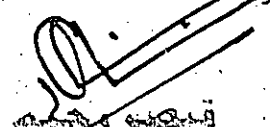
**ACCEPTED**  
  
Senior Civil Judge, Tank

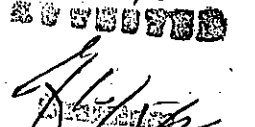
Or-----07  
22.10.2011

Dy: for the State present. Accused on bail along with his counsel present. PWs Abdul Ghafar OASI, Akhtar Munir HC, Muhammad Yousaf No 33, and Said Qamar ASI present. Statement of Abdul Ghafar recorded as PW-01, while the statement of the rest of the present PWs not recorded due to request for an adjournment by the counsel for the accused. PW Muhammad Yousaf No 33 requested for release of his Monthly Pay which was attached to this Court due to his absence. Request of the concerned PW is accepted and his monthly salary is released for the Month of September 2011. Remaining PWs absent. NBW should be issued against PWs. PP given to present PWs. File to come up for prosecution evidence on 28.11.2011.

  
Qaiser Rahim,  
Senior Civil Judge  
Tank.

نوٹ رڈر  
28-11-11  
01-8  
09-1-12  
DPP  
27/12

  
سینئر سول جج ٹانک

  
Senior Judge, Tank

State vs Abdul Wahhid

Or-----09  
27.01.2012

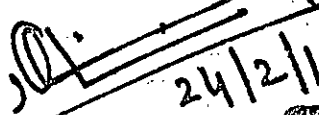
APP for the State present. Accused on bail along with his counsel present. PW constable Yousaf Kundi No 77 present and his statement recorded as PW-01. APP for the State abandoned PW Late Murid Akber Shaheed being dead. Statement of the APP recorded to this effect and placed on file. Remaining PWs absent. NBW should be issued against remaining PWs. File to come up for prosecution evidence on 11.02.2012.

  
Qaiser Rahim,  
Senior Civil Judge  
Tank

نوٹس نمبر 11-2-12  
تاریخ 11-2-12  
ڈیپٹی سیکشن آف پولیس  
ٹانک  
12-2-12

Or-----10  
24.02.2012


DPP for the State present. Counsel for accused along with the accused on bail present. Mr. Kifayat Ullah MASI present and his statement recorded as PW-03. PW Akhtar Munir HC, Amir Muhammad IHC and Said Qamar ASI absent, inspite NBW issued against them. Fresh NBW should be issued against PW Akhtar Munir HC, Amir Muhammad IHC and Said Qamar ASI through DPO Tank with strict notice for compliance. File to come up for evidence of the prosecution on 03.03.2012.

  
24/2/12  
(QAISER RAHIM)  
Senior Civil Judge, Tank.  
Office of the District  
Senior Judge, Tank

Or-----11  
03.03.2012

DPP for the State present. Counsel for the accused along with the accused on bail present. Today once again none of the PWs are present inspite of NBW issued against them through DPO Tank. Even it is interesting to note that the sub ordinates of DPO Tank have not returned the NBW which was issued by this Court on last date fixed. This shows that the Police Officials all of them posted at District Tank have refused to accept the Orders of DPO Tank. This Court has taken a serious view of the situation. Therefore fresh NBW should be issued against the remaining PWs through DPO Tank with the direction that if the prosecution fails to produce the evidence in this Court on next date fixed then in that case the Orders in accordance with Cr.P.C 1898 will be issued. Copy of this Order sheet should also be attached with the NBW for compliance. File to come up for prosecution evidence on 19.03.2012.

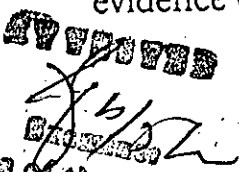
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(QAISER RAHIM)  
Senior Civil Judge, Tank.

Or-----No 12  
19.03.2012

None present on behalf of the State. Notice be issued to District Public Prosecutor Tank for attendance. Accused on bail present. PW Akhtar Munir HC and Amir Muhammad IHC present. However the counsel for the accused is not present in District Court Tank as he is stated to be busy in august Peshawar High Court DIK Bench. PW Syed Qamar ASI absent, inspite NBW. Fresh NBW should be issued against Syed Qamar ASI through SHO Mullazai. File to come up for prosecution evidence on 29.03.2012. PP given to present PWs.

m

  
Office of the District  
Senior Judge, Tank

  
(QAISER RAHIM)  
Senior Civil Judge, Tank.

سید فارہنام عبدالوحید - 57/2 - 2011

نوٹ ریکارڈ  
29.03.2012

حاضری حسب سابق - افسر جلیس صاحب رخصت - آئندہ ہر سہ روز  
لنڈا ہٹل حسب سابق کارروائی مورخہ 6/4/12 کو پیش ہوگی

نوٹ ریکارڈ  
6-4-12  
صوفی صاحبہ کی آئندہ ہر سہ روز کی کارروائی مورخہ 6/4/12 کو پیش ہوگی  
صوفی صاحبہ کی آئندہ ہر سہ روز کی کارروائی مورخہ 6/4/12 کو پیش ہوگی

APP برائے سرکار صوفی - علزم صوفی - گوانڈان استغاثہ  
غیر صوفی - سکن بنام بقیہ گوانڈان استغاثہ جاری ہوئی  
محل درائے شہادت استغاثہ مورخہ 25/04/12 کو پیش ہوئی

KAISER-RAHIM  
SENIOR CIVIL JUDGE  
TMA MAGISTRATE  
TANK

02-04  
25.04.2012

App for the State present. Accused present on bail. PV Syed Damar again absent. Fresh NBR should be issued again him. File to come up for prosecution evidence on 08-05.2012.

Senior Civil Judge  
Judicial Magistrate Tank

0-05  
08/05/12

APP for the state present. Accused absent.  
Summons be issued to accused and notice  
to his relatives. PWS not in attendance.  
NBW be issued against rest of the PWS. File  
to come up for prosecution evidence on 24<sup>5</sup>/<sub>12</sub>

RECEIVED  
14  
Office of the District  
Judge, West

Senior Civil Judge/  
Judicial Magistrate  
Tank

۱۶۰۱ عدالت اور ۱۵۰۰ ڈی پی سی

عدالت میں داخلہ کیا گیا ہے

Office of the ...

### کوائف گواہان

تفصیل	کوائف گرفتار شدہ ملزمان		عرفی
	زیر حراست	بر ضمانت	

- ۱) عبدالقادر پورہ DP ٹانگ
- ۲) اختر علی صاحب ٹانگ
- ۳) محمد یوسف صاحب ٹانگ
- ۴) امیر محمد
- ۵) بدر علی
- ۶) میر ذکر علی

### کیفیت

۴۶۸/۴۷۱

ما علما حسب مراتب مقدمہ سلاجہ کے قریب ۴/۱۰ کو مسلم بلا نام لے کر داخل ٹانگ میں نظر رکھ کر کنٹرول کیا گیا۔

۱۲/۱۰ کو عدالت کے حوالے کیا گیا۔

۱۳/۱۰ کو عدالت کے حوالے کیا گیا۔

۱۴/۱۰ کو عدالت کے حوالے کیا گیا۔

۱۵/۱۰ کو عدالت کے حوالے کیا گیا۔

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۵۰/۱۰ کو عدالت کے حوالے کیا گیا۔

18

منه من - فلافندم - ندرج طابند بنده - طلاله سابقه - سعادت صلا صلا

*[Signature]*  
no/50/03

**STANDARD**  
*[Signature]*  
STANDARD

الذکر من حوض

تعمیر طلاله	1
بند ریاض حوض - کار حوض	2
علاجه سمنه - دانه طابند	1
علاجه سمنه - دانه طابند	2
فول طابند - سمنه	3
فول طابند - سمنه	3

(13) قلمه

Put in count

*[Signature]*  
DPP  
11/4/11

کنز 1144 / 10

*[Signature]*



**IN THE COURT OF MR. QAISER RAHIM, SENIOR CIVIL JUDGE/JUDICIAL  
MAGISTRATE EMPOWERED WITH SECTION 30 CR.P.C, TANK**


**FORMAL CHARGE**

I, Qaiser Rahim, Senior Civil Judge/Judicial Magistrate empowered with Section 30 Cr.P.C Tank, hereby charge you accused Abdul Waheed son of Shaista Khan Caste Kundi Resident of Gul Imam Tank Tehsil and District Tank as follows:-

That on 09.09.2010 at about 17:30 hours, in the criminal jurisdiction of Police Station Tank, you accused produced and presented forged academic certificates at the time of your appointment in Police Department and thereby committed an offence punishable U/S 420-468-471 PPC within the cognizance of this court.

I hereby direct that you be tried by this Court (or me) on the said charge.

**Dated: 27.06.2011**

  
(QAISER RAHIM)

Senior Civil Judge, Tank.

The charge has been read over and explained to the accused.

Q. Do you understand the charge?

A. Yes

Q. Do you plead guilty or have you any defence to make?

A. No I claim trial.

Accused: -----

عبدالواحد

CERTIFIED U/S 364 CR.P.C

RO & AC

27.06.20.11

  
(QAISER RAHIM)

Senior Civil Judge, Tank

**RECORDED**  
**INDEXED**  
**27.06.2011**  
**Senior Civil Judge, Tank**


State vs Abdul Wahid

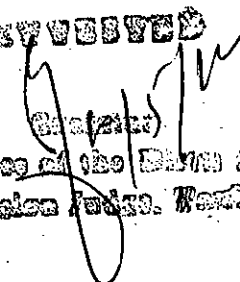
Statement of Niamat Ullah Jamal APP attached with the Court of Senior Civil Judge, Tank stated that I hereby abandon Late Murid Akber SHO Shaheed being dead.

APP for the State Nai-rat

Dated:  
27.01.2012

RO & AC

  
(QAISER RAHIM)  
Senior Civil Judge, Tank. 27/1/12

RECORDED  
  
Office of the District  
Senior Civil Judge, Tank

PW-----01  
22.10.2011

21

Statement of Abdul Ghaffar OASI Police line Tank stated on oath that during the days of occurrence I was posted as Reader/OASI to DPO Tank. That on 24.04.2010 the accused facing trial was recruited/appointed as Cook-constable and was allotted constabulary No 74 at the time of his recruitment, the accused facing trial had handed in/ tendered a Matriculation Certificate, copy of which is placed on file and is exhibited as Ex:PW-1/1 while I have brought to the Court the original photo copy which the accused facing trial had attached with his application for recruitment and which was later on sent to BISE Bannu for verification. The said certificate was sent to BISE Bannu for verification vide letter No-3616 dated 07.07.2010 which is exhibited as Ex: PW 1/2 which is correct and correctly bears the signature of DPO Tank. Similarly the report from BISE Bannu was received vide letter No 440 according to which the certificate in question was found to be fake and bogus. The letter No 440 is exhibited as Ex:PW-1/3. Similarly I brought this matter into the notice of DPO Tank vide my report dated 23.08.2010 which is placed on file and is exhibited as Ex:PW-1/4 and the same was sent to DPP Tank for comments. The DPP Tank recorded his comments on my report and the same was sent to DPO Tank. Similarly the accused facing trial applied to DPO Tank to Order a verification regarding his Matriculation Certificate of BISE Peshawar and his application in this regard is exhibited as Ex:PW-1/5 and according the order of DPO was made part of inquiry against the accused facing trial and the inquiry report in this regard is exhibited as Ex:PW-1/6. Subsequently FIR No 560 dated 09.09.2010 was registered against accused facing trial on my report. Later on the site plan was prepared by the IO at my instance. My supplementary statement was recorded by the I.O. Similarly the photo copy of the matriculation certificate issued by the BISE Peshawar which is placed on file Ex: PW 1/7.

XX: (by Counsel for the accused) The application for recruitment is submitted in the office of DPO with Orderly Assistant Sub Inspector. I am Reader/OASI in the DPO Office Tank. All the applications are submitted personally and the physical fitness is also checked in the office. I was not OASI in the office of

*[Handwritten signature]*  
Officer of the State

DPO Tank when application of accused for recruitment was submitted. I can not say as to when and through whom the application of the accused was submitted. Voluntarily stated that the relevant record is available in the Office. After recruitment of constable the relevant record is handed over to concerned clerk in whose custody the record remains while service record /Fouji Misal remains with me. It is correct that there is no application on behalf of accused facing trial that he has passed his matriculation certificate from Bannu Board, Voluntarily stated that he submitted certificate of Bannu Board. It is correct that there is no entry in the judicial record that the accused facing trial passed his SSC exam from Bannu Board. Voluntarily stated that he tendered certificate of Bannu Board in this behalf. Except the certificate produced by the accused at the time of recruitment there is nothing on our office record that the accused has passed his SSC examination from Bannu Board. I produce photo copy of application submitted by accused for recruitment which is Ex: PW 1/D-1. It is correct that no verification from Peshawar Board was made regarding the passing of SSC Exam by the accused. Voluntarily stated that according to the certificate of Peshawar Board the accused was over age and for this reason no verification was made. It is correct that there is no record available on the judicial file regarding the requirement of age and its limit for recruitment as cook. Voluntarily stated that the same is available in our office record. I also produce application for condonation of upper age limit by accused facing trial Ex: PW 1/D-2. It is incorrect to suggest that I deposed falsely. It is also incorrect to suggest that the original certificate of the accused facing trial issued by Peshawar Board were misplaced in order to dismiss him from service after the refusal of the accused to serve in the home town of the then DPO Tank as his personal cook.

*[Handwritten signature]*  
 Senior Judge, Tank

*[Handwritten signature]*  
 27/10/11  
 Qaiser Rahim,  
 Senior Civil Judge  
 Tank.

PW- 02 *Qu*  
27.01.2012

**Statement of Constable Yousaf Kundi No 77 Police station Tank Now posted**

**Police station Mullazai on Oath** on oath stated that During the days of occurrence I

was posted as DFC at Police Station Tank. I am also marginal witness to the memo of

search dated 23.09.2010 vide which the house of the accused was raided after

fulfilling all the legal formalities by the police party headed by the SHO. I have seen

the memo which is available on judicial file and correctly bears my signature and is

Ex :PW *Qu* 2/1. I was deputed to execute the warrant U/S 204 Cr.P.C 1898 against

accused namely Abdul Wahid Son of Shaista Khan Caste Kundi, I after fulfilling all

the formalities recorded the statements of the nobility of the area which are available

at the back of warrant along with my report which are available on the judicial file

correctly bears my signature and are Ex: PW *Qu* 2/2 while my report on the back of

warrant are Ex: PW *Qu* 2/3. In the same way I was also deputed for proclamation

proceedings U/S 87 Cr.P.C 1898 against the above named accused, I fulfilled all the

codal formalities and visited the house of the accused and pasted a copy of

proclamation at the door of the accused, the second copy of proclamation notice was

also pasted outside the Court Room and the third copy of proclamation is available

on the judicial file having statements of the elders of the area along with my reports

which correctly bears my signature and are Ex: PW *Qu* 2/4 while my report on the back

of the same are Ex: PW *Qu* 2/5 respectively.

**XX: (by counsel for the accused)** It is correct that I have not mentioned the ID Card number of the elders of the locality. It is correct that I have not examined any Nazim or councilor of the illaqa. It is also correct that I have not prepared the sketch of the house of the accused. It is correct that my report on the back of the warrant as well as proclamation notice do not bear any date. It is incorrect to suggest that I deposed falsely and completed all the formalities in the police station.

*Qu*  
Yousaf Kundi  
Constable No 77  
Police Station Tank


R.O & A.C  
*Qu*  
Qaiser Rahim  
Senior Civil Judge Tank

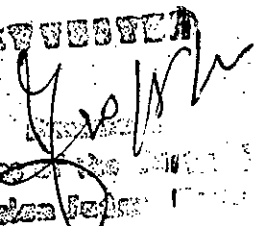
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24  
PW-----03  
24.02.2012

Statement of Kifayat Ullah MASI Police Station Tank stated that during the days of occurrence I was posted as MASI PS Tank. On the receipt of Murasila I incorporated its contents in to FIR today I have seen the same which is placed on file, correct and correctly bears my signature and exhibited as Ex: PW-3/1.

XX: Nil (Opportunity given)

RO & AC

  
24/2/12  
Qaiser Rahim,  
Senior Civil Judge  
Tank

  
Kifayat Ullah  
MASI Police Station  
Tank

قائد ملتان

خان عبداللہ عکرم

ضلع ملتان

بمقام سیکرٹری 560 مورخہ 29/10/2019 پی سی آئی 420-468-471 قائد ملتان

مختصر کیفیت سے سیرم قانونی و صفحہ 420-468-471 مورخہ 5/12/2019

ذرا سوال: مختصر حالات مقدمہ میں عدیدہ مورخہ 9/10/2019 کو گرفتار  
 سربراہ آئی ڈی ملتان کو عدالت میں لایا گیا اور 134 ریٹائرڈ DP کے  
 ایک ٹریڈیو کے ذریعے جس کے پاس DP کے حساب سے ڈیپازٹ کی گئی تھی  
 فوراً بطورے پھرنے میں خالی قلموں کی جیلنگ ہوا۔ کہ عدالت  
 نے اس کے خلاف کارروائی کی ہے لیکن مورخہ 24/10/2019 کو ڈیپازٹ  
 میں بطور ایک کاغذی نوٹس ہوا تھا۔ جس کو کسٹم کے ذریعے 74  
 بوقتے میں بطورے بطورے میں ڈیپازٹ کی گئی تھی۔  
 کہ جو اس کے لئے ڈیپازٹ کی گئی تھی اور اس کے لئے  
 جاریہ اسٹیٹ کے سیکرٹری اور ڈیپازٹ کے لئے ایڈیشنل  
 جنرل اور ڈیپازٹ کے سیکرٹری کے پاس ڈیپازٹ کے لئے  
 DP کے لئے ڈیپازٹ کے لئے ڈیپازٹ کے لئے  
 حوالہ دیا گیا ہے۔

PW-2 کاغذی نوٹس کے ذریعے 33 مختصر حالات ملتان  
 قائد ملتان  
 PW-1 عبدالقادر 134 ریٹائرڈ DP کے پاس ملتان  
 (3) ایکسپریس 14 ناٹرز ڈیپازٹ ملتان  
 PW-3 کاغذی نوٹس کے ذریعے 02 مختصر حالات ملتان  
 قائد ملتان  
 PW-4 عبدالکریم خان 134 ملتان

Signature  
 Chairman  
 of the  
 Special  
 Investigation  
 Team

مختصر حالات ملتان

25

ملتان





مبلغ طمانہ

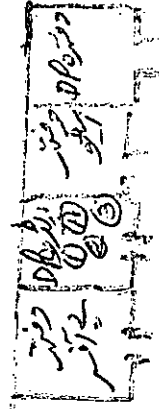
لغسد موقع نظر بن سیکین

قائم طمانہ

تقدیر نمبر 605 مورخہ 9/9/10 جیم 420-468 PC قائم طمانہ  
471

مکمل

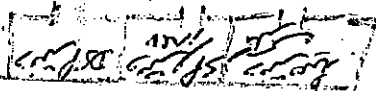
تقدیر DSP



مستحقین

100

مبلغ



مستحق

مستحق

مستحق - جائے وقوعہ دفتر نوٹس طمانہ دہلی حد سے روغنا ہوا ہے۔  
 قسم ایک A دفتر دہلی طمانہ رقم نشان کو طمانہ کیا گیا ہے۔  
 قسم دیگر جائے وقوعہ دفتر عبدالغفار 134/HC کو طمانہ کیا گیا۔  
 قسم تیسرے اس قسم پیرنگ خانہ عبدالوحید دفتر دہلی طمانہ میں کمانڈر سٹریٹیکٹ  
 ڈویژن میں بوقت ہجرت پیش کیا گیا ہے۔ مستحقین۔  
 قسم چوتھے اس قسم پیرنگ خانہ دفتر عبدالغفار 134/HC کو طمانہ کیا گیا۔  
 حصص تقاضات: تقاضات 1، 2، 3 کا درجہ خالص 2/2 کا مبلغ فراہم ہے۔  
 مستحق موقع سے تقاضا دفتر عبدالغفار 134/HC دفتر دہلی طمانہ میں مستحق ہوا  
 گزارش ہے۔

Mohd  
 IHC-INVEST ADR  
 9-9-2010

2/1  
 Secy of the L...  
 Justice Dept, H...

ضلع ٹانک



فرد خانہ تدریس

ضلع ٹانک

420-468

471

9/9/010

مکتوب عدالت نمبر 565 مورخہ

عبدالحوید ولد شاکستہ خان قوم کندی سکندریہ ضلع ٹانک

دوسرو گوجران زمین قدر و بیوان بالا میں ملزم بالا کے باا حیدر گنڈارا

ازادہ مستورات کا خدایت بند و لبت کر کے چھوٹے جس سے مضابطہ

خانہ تدریس میں لائے گئے دیوان خانہ تدریس نزد ملزم بالا کے پاس

ہوا اور نہ پہا کوئی دیگر غیر ممنوع اشیاء لہا اور کر کے چھوٹے

کیوں لیکر آئے۔ فرد خانہ تدریس پر موقع مرتبہ چھوڑ کر اس کے

Mohd. IHC. M. P. S. TANUK 23-9-010

گوجران

کاٹیل محمد نسیم نمبر 34 صفحہ 177 از خانہ ٹانک

کاٹیل محمد یوسف نمبر 33 صفحہ 177 از خانہ ٹانک

Ex. 100/1000  
S. J. 100/1000  
27.01.2010

Stamp of the District  
TANUK



مجلس

دفتر اسناد دربار محول  
و در دفتر ریاست  
مجلس

شماره

شماره ۴۶۸-۴۶۹  
۴۶۱

بنام عبدالوحد و شایسته خان صاحب  
مجلس

دفعه اولاً در مورد الا دو در شفاعت  
کتابخانه

لقدنا مذکور منلاف و درت زیر دفعه  
مجلس

کارهای

Registered No 2

112-ine Tank

24-09-10

Lib  
Pank - dtd

Issue

24/9/10

~~Lib - Tank  
24/09/10~~

RECEIVED  
Office of the  
Assistant Judge, ...

تعمیرات کے لیے درخواست درج ذیل وصولی کے ساتھ (فیلچر ٹانک)  
ذیل رقم جمع کرنے کے لیے

تعمیرات کی رقم 560 روپے 99 پیسے 420468  
471

یہ رقم: محمد اویسیہ دارشاد سے خان قوام کٹرہ میں سنبھل کر اٹھائی

ذیل حال: محمد عثمان بالا میر صاحب نے خان قوام کٹرہ میں سنبھل کر اٹھائی  
2014ء میں خان قوام کٹرہ میں سنبھل کر اٹھائی  
خان قوام کٹرہ میں سنبھل کر اٹھائی  
خان قوام کٹرہ میں سنبھل کر اٹھائی  
خان قوام کٹرہ میں سنبھل کر اٹھائی

Mohd  
11C INK-PS-TANK  
28.9.010

Forwarded Sir  
S.P.P  
28-9-2010

Issue.  
Qaiser Rahim  
Senior Civil Judge/Judicial  
Magistrate, Tank  
29/9/10

RECEIVED  
[Signature]

وارنٹ زیر دفعہ ۲۰۴ ض ف

بعدالت جناب سینیٹر سول جج صاحب / جوڈیشل مجسٹریٹ ٹانک.

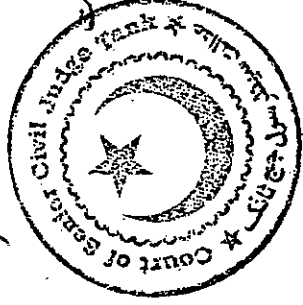
ملک نمبر ۳۶۰ ۹۹ ۲۷۰-۴۶۸ ۲۷۱ ۲۷۰

محمد لودھی ولد مالکستان قوم کنڈک کنڈک

ہر گاہ ہمارے زور و اس امر کے ناش کیا گیا ہے کہ شکایت بالا مجرم بالا میں مقدمہ صدر میں بعد وقوع زور و پیش ہے۔ اور جا کر گرفتاری سے گریزاں ہے۔ بذریعہ وارنٹ آپ کو حکم دیا جاتا ہے کہ ملزم بالا جہاں کہیں بھی دستاویز ہو کر گرفتار کر کے عدالت ہذا کے زور و پیش کریں۔

محمد لودھی  
۲۷-۱۰-۲۰۱۶

۱۱۵



محمد لودھی  
۲۷-۱۰-۲۰۱۶

فائل نمبر ۳۳۳۳۳۳۳۳

M.C. INU-PS-TANK  
24-9-2016

RECORDED  
FILED  
Office of the District  
Judge Tank, T.

محمد لودھی

جناب عالی

سید عبدالوہید ولد شہادتہ خان قریب تھری سکنہ گل آباد  
کو انی طور پر جانتا ہوں بعد قوی دلوشن ہو گیا ہے  
اور اپنے جائزہ شمارہ سے گریز ہے۔ ریورنڈ ہاں ہے

بیت اللہ بقلم خود

الہ  
عبداللہ ولد عبدالعظیم قریب تھری سکنہ گل آباد

جناب عالی

سید عبدالوہید ولد شہادتہ خان قریب تھری سکنہ گل آباد  
ہارے گاؤں میں موجود نہیں ہے ریورنڈ ہاں ہے

اپنی طرف سے  
ایجنٹر سول جج ٹانک

جناب عالی

بیت اللہ بقلم خود

الہ  
شہادتہ ولد شہادتہ خان قریب تھری سکنہ گل آباد

جناب عالی

سید عبدالوہید ولد شہادتہ خان قریب تھری سکنہ گل آباد  
ہارے گاؤں میں موجود نہیں ہے ریورنڈ ہاں ہے

سید عبدالوہید ولد شہادتہ خان قریب تھری سکنہ گل آباد  
تھری سکنہ گل آباد  
ریورنڈ ہاں ہے  
دیکر دانستہ ریورنڈ ہاں ہے  
اور اپنے جائزہ شمارہ سے گریز ہے  
2012 صفحہ نمبر 1  
ہل حوالہ کیا گیا

بیت اللہ بقلم خود

الہ  
شہادتہ خان ولد شہادتہ خان قریب تھری سکنہ گل آباد

کریپٹو ایجنٹ

Handwritten signature

Stamp: District Court, District of ...

بعدالت جناب سینئر سول جج صاحب / جوڈیشل مجسٹریٹ ٹانک۔

بحوالہ مقدمہ علت نمبر ۶۶۰ مورخہ ۹/۱۰/۲۰۱۵ تھانہ ٹانک جرم ۴۶۸-۴۶۸-۴۶۸  
 ہر گاہ میرے سامنے اس امر کی شکایت ہوئی ہے کہ مسی عبدالرحمن حیدر ولد مسی عبدالرحمن حیدر ساکن گھریں امام  
 جرم ٹانک کا مرتکب ہوا ہے یا اس پر شبہ کیا گیا ہے جس کی سزا مجموعہ قوانین پاکستان کی دفعہ ۱۰۰(۱) میں مقرر ہے  
 رپورٹوں پر دی گئی کیفیت سے واضح ہے کہ مسی مذکورہ دستیاب نہیں ہو سکتا۔ اور ہر گاہ ثابت ہوا کہ مذکورہ فرار ہو گیا ہے۔ یا وارنٹ کی  
 تعمیل سے گریزاں ہو کر روپوش ہو گیا ہے۔ لہذا اس اشتہار سے حکم دیا جاتا ہے کہ مسی عبدالرحمن حیدر ساکن گھریں امام کو  
 لازم ہے کہ وہ بعدالت ہذا مورخہ ۲۷/۱۰/۲۰۱۵ کو زیر دستخطی کے زور و جوابدہی کے لئے حاضر ہو۔

Qaiser Rahman  
 Senior Civil Judge/Judicial  
 Magistrate/Tank  
 29/10/15

En P 29/3  
 27.10.2012  
 27.10.2012



RECEIVED  
 District Court  
 Tank



سید الوہید ولد شمسہ خان قوم کشتری  
سکر ایچ ایم کوئٹہ ذاتی طور پر جاتا چل  
لکڑی قوم روپوش جو کھائے کھو گئی  
خانہ کھاری سے سرسراں ہے۔

سید الوہید ولد شمسہ خان قوم کشتری  
سکر ایچ ایم کوئٹہ ذاتی طور پر جاتا چل  
لکڑی قوم روپوش جو کھائے کھو گئی  
خانہ کھاری سے سرسراں ہے۔

الوہید

صیری لہ بقلم خود

سید عالم ولد اعان اللہ قوم کشتری سکریٹری ایچ ایم

بہل زمانہ دل بخت اللہ قوم کشتری سکریٹری ایچ ایم

Handwritten notes and signatures in the middle section, including a date '2012-01-27' and a name 'جانبالی اہلی'.

سید الوہید ولد شمسہ خان قوم کشتری  
سکر ایچ ایم کوئٹہ ذاتی طور پر جاتا چل  
لکڑی قوم روپوش جو کھائے کھو گئی  
خانہ کھاری سے سرسراں ہے۔

بیت اللہ

بیت اللہ ولد حبیب اللہ قوم لفران سکریٹری

Handwritten notes on the left side, including a date '2012-01-27' and a name 'جانبالی اہلی', and a signature 'محمد علی'.

Official stamp and signature at the bottom center, with the text 'SECRETARY' and 'Office of the Secretary'.

STATE.....VS.....Abdul Wahid.

SW- 1  
14.12.2010.

Statement of Constable Muhammad Yousaf No 33 INV Staff Police Station Tank on oath stated that. During the days of occurrence he was posted as DFC at Police Station Tank. I conducted all the proceedings U/S 512 Cr.P.C against accused Abdul Wahid. I searched the accused in his houses as well as the surrounding areas but he is avoiding his legal arrest and he returned the warrant unexecuted. The Warrant is EX: SW-1/1, while his report on the back of the said warrant are EX: SW-1/2. Similarly the proclamation against the accused was issued U/S 87 Cr P.C and the same is exhibited as Ex: SW 1/3 while the report of the Muhammad Ramzan is Exhibited Ex: SW ¼.

XX: Nil (Accused is absconding).

RO & A.C  
14.12.2010.

  
Qaiser Rahim  
Senior Civil Judge Tank  
14/12/10

SEARCHED  
INDEXED  
SERIALIZED  
FILED  
14/12/10  
TANK  
Dist. of the Punjab  
Punjab State V.C.S

Statement of SPP attached with the Court of SCJ Tank. Stated that the prosecution relies upon the evidence recorded up till now and doesn't want to produce further evidence. The prosecution will produce further evidence after the arrest of accused in the instant Case.

SPP

RO & AC  
14.12.2010

QAISER RAHIM  
Senior Civil Judge  
Tank.

STAMPED AND SIGNED  
14/12/2010  
QAISER RAHIM  
Senior Civil Judge  
Tank.

53  
2

20/10

38

## دائمی وارنٹ گرفتاری

بعدالت جناب سینئر سول جج رجسٹریشنل مجسٹریٹ ٹانک

سید ابوبکر ولد سید محمد علی صاحب کدیری

علت نمبر 560 مورثہ 9.9.10 جرم 47/468-420 تھانہ لائیک  
PPC

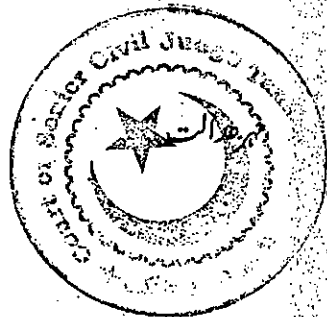
SHO تھانہ لائیک

نام :-

بمقدمہ صدر :- مقدمہ بالا میں ملزم بالا کے خلاف کارروائی 512 Cr.P.C مکمل شد۔ ملزم کو مجرم اشتہاری قرار دیا جاتا ہے  
لہذا حکم ہوا ہے۔ کہ مجرم اشتہاری متذکرہ بالا کی خلاف سارنٹ دائمی جاری ہوں اور جب بھی گرفتار ہوں تو عدالت  
کے روبرو پیش ہوں۔

نوٹ :- DPO, TANK کو یہ ایڈیٹ کی جاتی ہے کہ وہ اشتہاری ملزم کا نام رجسٹر مفروان میں درج کریں۔  
جبکہ SHO متعلقہ رجسٹر اشتہاری مجرمان میں ضروری اندراج کریں۔

سینئر سول جج رجسٹریشنل مجسٹریٹ  
KAISER RAHIM  
SENIOR CIVIL JUDGE  
TANK



47/468-420  
9.9.10  
SHO



جناب عالی!

مسی عبدالوحید ولد شائستہ خان قوم کنڈی سکند گل امام کو مورخہ 24.04.2010 کو محکمہ پولیس ضلع ٹانک میں بطور رکن کنسٹیبل بھرتی کیا جا کر ضلع ہڈاکا کنسٹیبل بری نمبر 74 اٹا کیا گیا۔ مذکورہ نے بوقت بھرتی میٹرک کی سرٹیفکیٹ پیش کی تھی جب مذکورہ کی سرٹیفکیٹ کی بنوں بورڈ سے ریٹیکلیشن کرائی گئی تو بحوالہ لیٹر انگریزی نمبر 4401 Certificates/BISE Bannu مورخہ 07.07.2010 جاری اسٹیٹ سیکرٹری بورڈ آف انٹرمیڈیٹ اینڈ سیکنڈری ایجوکیشن بنوں مذکورہ کی سرٹیفکیٹ میٹرک بوس پائی گئی۔ جس کی وجہ سے مذکورہ کو بحوالہ OB نمبر 1295 مورخہ 12.08.2010 کو محکمہ پولیس ضلع ٹانک سے ملازمت سے برخاست کیا گیا ہے۔

رپورٹ میرا مناسب حکم گزارتی ہے۔

*[Signature]*  
 olte Tank  
 23.8.10

Ex: PW 1/4

*[Signature]*  
 J.M. / SES  
 Tank  
 2/9/11

DPP Tank  
 For Comments  
 DPP Tank

Perusal of record reveals that cognizable offences u/s 420/468/471 PPC are made out.

*[Signature]*  
 DPP  
 6/9/10

REGISTERED  
 6/9/10  
 DPP Tank  
 Register was Case as  
 obtained by me DPP/  
 Tank

*[Signature]*  
 DPP Tank  
 09.9.10

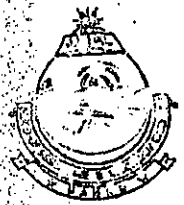
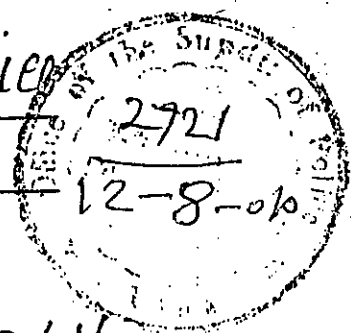
(41)

**Board of Intermediate and Secondary Education, Bannu**

No. 440 /Certificates/BISE, Bannu.

Dated 7-7-10

To - The Distt officer Polio  
officer Tank



Subject: VERIFICATION.

I am directed to refer to your letter No. 3616 dated 7-7-10

on the subject noted above and to inform you that photocop (y) (ies) of Original / Provisional Certificate (s) of the following candidate (s) enclosed with the above mentioned letter have thoroughly checked and found as detail given below:

S.No.	Roll No	Name	Father's Name	Session	Remarks
1	53120	Abdul wahid	Shaista Khan	sse A-97	Bogul
2	2875	AKbar Ali Khan	Said ulah Khan	sse S-92	Correct
3	68509	Muhammad jakeid	Muhammad Aslam	"A-95	Correct
4	5411	9 <sup>th</sup> Khair Ahmad	Rehmat ulleh Khan	"A-94	Correct
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					

Attested

EX: Pw 1/3

S.M/SCS  
Tank

Cy 28/7/10

O.H.C. SRC

As n - a.

(Assistant Secretary)  
Board of Intermediate &  
Secondary Education, Bannu.  
29/7/10

(42)

BN 2084

Roll No. 53120



Ex: P.W.

Ans

J.M. Scs  
22/9/82

Stally

Cy

Bannu N.W.F.P Pakistan

### Secondary School Certificate Examination

Attested as  
true copy of  
original

ABDUL WAHID  
SHAISTA KHAN  
DISTRICT TANK.

Assistant Secretary (Certificate)  
Board of Intermediate & Secondary Education  
Bannu

has passed the Secondary School Certificate Examination of the Board of Intermediate & Secondary Education, Bannu as a Private candidate. He/She obtained 500 Marks out of 600 has been placed in Grade C Representing GOOD

- The Candidate passed in the following subjects:
- |            |                     |                 |                 |
|------------|---------------------|-----------------|-----------------|
| 1. English | 3. Islamiyat        | 5. GEN. MATHS   | 7. ISL: STUDIES |
| 2. Urdu    | 4. Pakistan Studies | 6. GEN: SCIENCE | 8. ARTS.        |

He/She has been awarded Grade C on the basis of Intermediate examination by the Institution concerned.

Date of birth according to admission form is 6TH MARCH of THOUSAND NINE HUNDRED AND EIGHTY TWO (06/03/1982)

*[Signature]*  
Assistant Secretary

*[Signature]*  
This certificate is issued without reservation or award

*[Signature]*  
Secretary



تھانک ٹانک اور خواجہ دربارہ التواء ضلع ٹانک

نمبر 565 مورہ 99 ص 420-468

عبدالوسید ولد سائستہ خان قوم تھانکی سکنہ گھر اسلام آباد

ضیاء عالی بہ فقیر عزا میں عزم بالا کے ساتھ تھانک

اور اس طرح عزم بالا کے بعد سہ ہفتے کے

طور پر جو وقت بھی پیش کیا گیا۔ جو لوگ

پانگیا ہے۔ کوئی دفتر سے حاصل کر سکتے ہیں

کراٹا مطلوب ہے

عزم بالا جو دیکھ جائیں گے تھانک سے لیز کرے

کے دفتر کا دیکھ لیں گے۔ جو اور

حصہ دفتر میں ملان نامک ہے

اس کے دفتر و دفتر کیلئے مزید 14 دن التواء عطا

فرمان ہوئے۔

Adjournment  
for 14 days  
granted.

Mahd  
H. CIANETANIK  
9319. 010

For  
22/9/10

Qaiser Rahim  
Senior Civil Judge/Judicial  
Magistrate, Tank

22/9/10  
22/9/10



8

45

The prosecution evidence was summoned. In order to prove the case against the accused, prosecution produced and examined 05 (05) witnesses while PW Murid Akbar was abandoned by the prosecution.

Arguments of learned counsel for the accused and APP for the state heard and case file perused.

The prosecution first witness in the instant case was Abdul Ghaffar who has appeared as PW-1. Who has that during the days of occurrence he was posted as Reader/OASI to DPO Tank. That on 24.04.2010 the accused facing trial was recruited/appointed as Cook-constable and was allotted constabulary No 74 at the time of his recruitment, the accused facing trial had handed in/ tendered a Matriculation Certificate, copy of which is placed on file and is exhibited as Ex:PW-1/1 while he has brought to the Court the original photo copy which the accused facing trial had attached with his application for recruitment and which was later on sent to BISE Bannu for verification.

The said certificate was sent to BISE Bannu for verification vide letter No-3616 dated 07.07.2010 which is exhibited as Ex: PW 1/2 which correct and correctly bears the signature of DPO Tank. Similarly report from BISE Bannu was received vide letter No 440 according to which the certificate in question was found to be fake and bogus. The letter No 440 is exhibited as Ex:PW-1/3. Similarly he brought this matter into the notice of DPO Tank vide his report dated 23.08.2010 which is placed on file and is exhibited as Ex:PW-1/4 and the same was sent to DPP Tank for comments. The DPP Tank recorded his comments on his report and the same was sent to DPO Tank. Similarly the accused facing trial applied to DPO Tank to Order a verification regarding his Matriculation Certificate of BISE Peshawar and his application in this regard is exhibited as Ex:PW-1/5 and according the order of DPO was made part of inquiry against the accused facing trial and the inquiry

Handwritten signature and initials in a circle.

Handwritten notes on the right margin: "29/12/10", "Magistrate", "imad".

ATTESTED  
2  
DEC 2010  
EXAMINER  
District & Sessions Court Tank

report in this regard is exhibited as Ex:PW-1/6. Subsequently FIR No 560 dated 09.09.2010 was registered against accused facing trial on his report. Later on the site plan was prepared by the IO at his instance. His supplementary statement was recorded by the I.O. Similarly the photo copy of the matriculation certificate issued by the BISE Peshawar which is placed on file Ex: PW 1/7.

The prosecution second witness was Yousaf Kundi who has appeared as PW-2. Who has stated that during the days of occurrence he was posted as DFC at Police Station Tank. He is also marginal witness to the memo of search dated 23.09.2010 vide which the house of the accused was raided after fulfilling all the legal formalities by the police party headed by the SHO which is Ex :PW 1/1. He was deputed to execute the warrant U/S 204 Cr.P.C 1898 against accused namely Abdul Wahid Son of Shaista Khan Caste Kundi, he after fulfilling all the formalities recorded the statements of the nobility of the area which are available at the back of warrant along with his report which are available on the judicial file correctly bears his signature and are Ex: PW 1/2 while his report on the back of warrant are Ex: PW 1/3. In the same way he was also deputed for proclamation proceedings U/S 87 Cr.P.C 1898 against the above named accused, he fulfilled all the codal formalities and visited the house of the accused and pasted a copy of proclamation at the door of the accused, the second copy of proclamation notice was also pasted outside the Court Room and the third copy of proclamation is available on the judicial file having statements of the elders of the area along with his reports which correctly bears his signature and are Ex: PW 1/4 while his report on the back of the same are Ex: PW 1/5 respectively.

The prosecution third witness was Kifayat Ullah who has appeared as PW-3. Who has stated during examination in chief that during the days of occurrence he was posted as MASI police station

*(Handwritten signature)*

Nadeem Ahmad  
Senior Justice/  
Judicial Magistrate T

**ATTESTED**  
3 DEC 2016  
District & Sessions Court Tank

21

47

Tank. On receipt of Murasila he incorporated its contents into FIR which is Ex:3/1.

The prosecution fourth witness was Amir Muhammad who has appeared as PW-4. Who has stated during his examination in chief that during the days of occurrence he was posted in investigation staff PS Tank. After registration of FIR the case was handed over to him for investigation. He prepared the site plan which is Ex:PW-4/1. He raided the house of accused in this regard he prepared house search memo which is already Ex:PW-1/1. He submitted application for bogus documents of accused which is Ex:PW-4/2. He recorded the statements of PWs. Accused was avoiding his lawful arrest therefore proceedings U/S 512 Cr.P.C were initiated against the accused. After completion of investigation he handed over the case file to the SHO concerned.

The prosecution fifth and last witness was Said Qamar who has appeared as PW-5. Who has stated that during the days of occurrence he was posted as ASI police station Tank. He issued card of arrest of accused which is Ex:PW-5/1. The witness concerned verified the signature of late Murid Akbar on supplementary challan which is Ex:PW-5/2. He also verified the signature of Murid Akbar on complete challan which is Ex:PW-5/3.

After closure of prosecution evidence, statement of accused was recorded U/S 342 Cr.P.C, wherein accused denied the allegations leveled against him in the charge and showed himself as innocent.

The perusal of the record shows that no recovery memo has been prepared by the police of the alleged bogus documents allegedly submitted by the accused before the office of the DPO Tank. Moreover, these documents are not taken into proper custody at the time of registration of the case against the accused. It is admitted by PW-1 in his statement that the accused had not mentioned the fact of his matriculation

Nadeem Muhammad  
Senior Civil Judge/  
Judicial Magistrate Tank  
6/9/17

ATTESTED  
16 DEC 2016  
EXAMINER  
District & Sessions Court Tank

48

from Bannu Board in his application for employment. He has also stated that the accused did not personally appear at the time of application. One more fact brought on record shows that the accused has done his matriculation from Peshawar Board and not Bannu Board as alleged by prosecution. The certificate of Peshawar Board has not been verified. The accused has himself applied for condonation of his age on the basis of certificate of Board of Intermediate and Secondary Education Peshawar and not Board of Intermediate and Secondary Education Bannu as alleged by prosecution. The alleged fact of submission of certificate of Board of Intermediate and Secondary Education by the accused at the time of recruitment has not been proved by the prosecution.

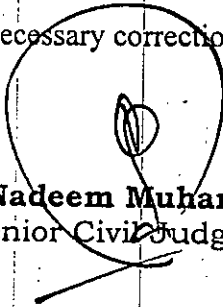
Therefore, in the light of the abovementioned circumstances, I hereby acquit the accused Abdul Waheed from the charges leveled against him. Sureties of the accused are discharge of their liabilities. File be consigned to General Record Room after necessary completion.

**ANNOUNCED**  
25.09.2013

  
**Nadeem Muhammad**  
Senior Civil Judge, Tank

**CERTIFICATE**

Certified that this Judgment consists of Five (05) pages. Each page has been signed by me after making necessary correction therein.

  
**Nadeem Muhammad**  
Senior Civil Judge, Tank



**ATTESTED**  
16 DEC 2013  
EXAMINER  
District & Sessions Court Tank

49

**Order No.34**  
**25.09.2013**

Accused on bail present. Vide my detail judgment of today placed on file, the prosecution has failed to prove the case against the accused. Therefore, the accused is acquitted in the instant case. Sureties of the accused are discharge of their liabilities. File be consigned to general record room after completion.

**Announced:**  
**25.09.2013**

**Nadeem Muhammad**  
**Senior Civil Judge, Tank.**

**ATTESTED**  
16 DEC 2013  
EXAMINER  
District & Sessions Court Tank





(15)

Handwritten notes at the top right, including "10/10/16" and "10/10/16".

Handwritten Urdu text on the right side of the page.

Handwritten signature and name "M. Tahir" with "30/03/16" below it.

Handwritten Urdu text in the middle section.

Handwritten Urdu text in the middle section, including "13" and "3".

ATTESTED  
16 DEC 2016  
EXAMINER  
District & Sessions Court Tank

Put in Envelope

2119  
Application Received On 16-12-16  
No. of Papers 8  
Copying Of Fee  
Urgent Fee  
Total Fee  
Copy ready for Delivered On 16-12-16  
Delivered On 16-12-16  
Signature of Examiner

Handwritten Urdu text at the bottom left, including "1144" and "10".

Handwritten signature and initials "DPS" in the bottom middle.

(S2)

786

Roll No. 26075

Ann

C

# BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan  
PROVISIONAL CERTIFICATE

SECONDARY SCHOOL CERTIFICATE EXAMINATION

Session 19 90 Annual/Supplementary.

THIS IS TO CERTIFY THAT

Son/Daughter of Abdul Waheed  
and a candidate of Bharista Icham  
D.I. Icham Dist

has passed the Secondary School Certificate Examination of the  
Board of Intermediate & Secondary Education, Peshawar held in April 1990 as a  
Regular/Private candidate. He/She obtained 376 Marks out of 830 and has been placed in  
Grade (D) Representing Fair

The candidate passed in the following subjects:

- 1. English
- 2. Urdu
- 3. Islamiyat
- 4. Pak. Studies
- 5. G: Maths/Maths (Ele.)
- 6. G: S.C.
- 7. IS
- 8. Art

Internal assessment Grade awarded by the Institution concerned is (X)

Date of Birth according to admission form is

Sixth March

One thousand nine hundred and

Sixty three (6-3-1972)

Prepared by

Checked by

Date of Preparation | 8/6/91

Asstt. Secretary (Certificate)  
Asstt. Secretary (Certificates)-II

Attested to be true  
copy

عبدالرحمن

Board of Intermediate & Secondary Education  
PESHAWAR

*Duplicate*

DETAILED MARKS CERTIFICATE  
Secondary School Certificate Examination  
(GENERAL GROUP)  
Session 19 70 (Annual/Supplementary)

Name Aleebal Waheed

Father's Name Shahid Ahmad

Roll No. 86075

SUBJECT	Total number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English	150	45	
2. Urdu	150	71	
3. Islamiyat Comp:	75	46	
4. Pakistan Studies	75	39	
5. Gen: Mathematics	100	33	
6. General Science	100	35	
7. <i>PAK</i>	100	70	
8. <i>IS</i>	100	37	
<b>Total</b>	<b>850</b>	<b>376-15</b>	

This certificate is issued errors and omissions excepted.

Prepared by [Signature]

Checked by [Signature]

Date \_\_\_\_\_ 19 \_\_\_\_\_

*assisted*  
 Controller of Examinations  
 Board of Intermediate & Secondary Education  
 PESHAWAR  
*G. Aman Tahir*

(54)

Annexure - D

حکم

بحوالہ لیٹر انگریزی نمبر Bannu/Certificates/BISE 440/ڈائری نمبر 2721/12-8-2010 جاری ہوا ہے۔  
اسٹنٹ سیکرٹری بورڈ آف انٹرمیڈیٹ اینڈ سکنڈری ایجوکیشن بنوں بعد ویریفیکیشن اور رجسٹریشن / پروویژنل سرٹیفکیٹ لکٹیشن  
عبدالوحید نمبر 74 کی میٹرک سرٹیفکیٹ بوس اجمعی پائی جا کر از روئے خصوصی اختیارات پولیس آرڈر 2000 (تعمیری  
(2005) لکٹیشن عبدالوحید کو تازین بھرتی سے منگوا پولیس سے برخواست لیا جاتا ہے۔

حکم درج آرڈر لکٹیشن سے

ڈسٹرکٹ پولیس آفیسر ٹانک

C.S. No. 12/35

12 8 10

Attested to be  
true copy

عبدالوحید

(SS)

Annexure - "E"

To

Honorable  
Deputy Inspector General of Police  
Dera Ismail Khan Range

Subject:- Departmental Appeal

REGISTERED A.D/THROUGH PROPER CHANNEL

Respected Sir,

The Appellant humbly submits as under:-

1. That the Appellant applied for the Post of Cook constable in the office of D.P.O Tank way back in year 2010 and submitted his documents for joining service and he was then appointed accordingly, but during the course of verification of academic testimonials of the Appellant, it allegedly transpired to the department that his documents are not genuine.
2. That later on, the Appellant was booked in case F.I.R No 560 Dated 19.09.2010 registered U/S 420-468-471 PPC of PS Tank for presentation of Fake documents and was sent for trial. The Appellant faced all the agonies of fake F.I.R however, the Learned Trial court/ Judicial Magistrate Sec 30 Crpc Tank was pleased to acquit him from all the charges. Copy of the acquittal Judgment/ Order Dated 25.09.2013 is enclosed as Annexure "A".

Attested to be  
True Copy  
M. J. Hussain

(56)

3. That as it is a matter of record that Appellant passed his Matriculation examination from the Board of Intermediate and Secondary Education Peshawar and not from the Board of Intermediate and Secondary Education Bannu, However the Departmental Authority erroneously sent the Matriculation certificate to the BISE Bannu for verification and relied upon the same despite the fact that verification was done from BISE Bannu instead of BISE Peshawar.
4. That on the afore stated allegations of fake documents, he was dismissed from service vide impugned Order Dated 12.08.2010 by District Police Officer Tank. Copy of the impugned Order is Annexure "B".
5. That Matriculation Certificate of the Appellant is genuine in all respects and the same even can be verified from BISE Peshawar, so the impugned dismissal Order dated 12.08.2010 is patently illegal void abinitio and ineffective upon the rights of Appellant, thus the same is liable to be set at naught at this score alone.
6. That it is also a matter of record that Appellant has not been associated at the Departmental level and the impugned has been passed at his back and also in an exparte manner.
7. That the major penalty, removal from service has been imposed by the Superintendent of Police Tank by violating the golden principle of natural justice i.e that no one should be condemned unheard, hence the impugned Removal Order Dated 12.08.2010 is liable to be set aside.
8. That the impugned dismissal Order Dated 12.08.2010 has neither been officially communicated to the Appellant nor it could be termed as legal order, and it is settled principle of law that no limitation runs against a void order, thus the instant Departmental Appeal may please be treated as with in time and benefit of The Police Rules 1975 and case law reported in 2016 PLC (C.S) 1254 may please be extended in his favour

Attached to be  
True copy No 9/1/13

(57)

9. That the appellant is a young lad and the financial future of the Appellant and his entire family is at serious stake; hence humbly beseech to set aside the impugned action/order which has no legal backing.

Dated:-27.02.2016

It is therefore, most humbly prayed that on acceptance of instant departmental appeal, the impugned Order Dated 12.08.2010 may please be set aside and applicant may please be reinstated in service with all back benefit.

Your Humble Appellant

*عبدالواحد*

Abdul Waheed

Son of Shaista Khan

Caste Kundi

Resident of Gul Imam Tehsil & District Tank

*Attested to be  
True copy*

*محمد علی*

(58)

Ann - F

To

The Worthy Inspector General of Police,  
Khyber Pakhtunkhwa, Peshawar.

Subject: REVISION OF DEPARTMENTAL APPEAL

Respected Sir,

The appellant humbly submits as under;

1. That the appellant was appointed as Cook on 24/04/2010 in Police Department District Tank.
2. That the appellant performed his duties to the entire satisfaction of his superiors. During service the appellant was falsely implicated in case FIR No. 560 dated 19/09/2010 u/s 420,468,471 PPC registered at P.S Tank on the allegation that the appellant had submitted fake documents. Copy of FIR is annexed.
3. That after conclusion of trial the learned trial court i.e. Judicial Magistrate Tank was pleased to acquit the appellant from the charges leveled against him vide judgment dated 25/09/2013. Copy of judgment is annexed.
4. That actually the appellant passed the SSC exam from the BISE Peshawar in session 1990 but inadvertently or deliberately verified the SSC certificate from BISE Bannu. Copy of SSC certificate is annexed.
5. That on the above stated allegation of alleged fake documents, the appellant was dismissed from service on 12/08/2010 by the District Police Officer Tank.
6. That after the honourable acquittal, the appellant submitted departmental appeal before your honour in the year 2017 which is still pending adjudication before your good-self and even did not communicate any result of the above mentioned departmental appeal. The copy of which is in the safe custody of your good office.

*Handwritten signature/initials*

Attested to be true  
*Handwritten signature*



7. That the appellant being aggrieved person, the instant revision petition is being filed, inter alia, on the following grounds.

GROUND:

- a. That the instant revision petition may kindly be considered as Integral part of departmental appeal of the appellant.
- b. That the allegation of submitting fake documents is baseless and false, hence, the impugned dismissal order is not sustainable.
- c. That it is pertinent to mention here that the appellant has not been given a single chance of personal hearing, hence, the appellant condemn unheard which is against law and service rules.
- d. That no charge sheet, initial show-cause notice, final show cause notice and statement of allegations were issued against the appellant, in short no inquiry whatsoever had been conducted in the case of appellant, hence, the impugned dismissal order is against the norms of natural justice and liable to be set aside.
- e. That the impugned dismissal order is void ab initio, thus, no limitation is run in the case of appellant. Moreover, during this period, the appellant remained seriously ill, similarly the wife as well as children of appellant also suffered severe diseases and as a result of which the pecuniary position of the appellant became so weak that the appellant was unable to pursue his case.

عبدالوسيد

Attested to be  
True copy  
عبدالوسيد

(60)

f. That the appellant is a poor fellow having family with children and there is no earning hand except the service of appellant, hence, the service of appellant is liable to be reinstated along with all back benefits.

It is, therefore, most humbly prayed that on acceptance of the instant revision petition on the departmental appeal the impugned void order dated 12/08/2010 may please be set aside and the appellant may kindly be reinstated into service with all back benefits.

Dated 03/09/2020

Humble Appellant




**Abdul Waheed**

son of Shaista Khan  
Caste Kundi, r/o Gul Imam  
Tehsil & District Tank  
Cell#0315-9880809

Ex-Cook Police Department  
District Tank

Attested to be  
True copy



(62)

To

The Worthy Deputy Inspector General of Police,  
Dera Ismail Khan region.

Subject: **REVISION OF DEPARTMENTAL APPEAL**

Respected Sir,

The appellant humbly submits as under;

1. That the appellant was appointed as Cook on 24/04/2010 in Police Department District Tank.
2. That the appellant performed his duties to the entire satisfaction of his superiors. During service the appellant was falsely implicated in case FIR No. 560 dated 19/09/2010 u/s 420,468,471 PPC registered at P.S Tank on the allegation that the appellant had submitted fake documents. Copy of FIR is annexed.
3. That after conclusion of trial the learned trial court i.e. Judicial Magistrate Tank was pleased to acquit the appellant from the charges leveled against him vide judgment dated 25/09/2013. Copy of judgment is annexed.
4. That actually the appellant passed the SSC exam from the BISE Peshawar in session 1990 but inadvertently or deliberately verified the SSC certificate from BISE Bannu. Copy of SSC certificate is annexed.
5. That on the above stated allegation of alleged fake documents, the appellant was dismissed from service on 12/08/2010 by the District Police Officer Tank.
6. That after the honourable acquittal, the appellant submitted departmental appeal before your honour on 27/02/2016 which is still pending adjudication before your good-self and even did not communicate any result of the above mentioned departmental appeal. The copy of which is in the safe custody of your good office, however, the copy of departmental appeal is annexed herewith for ready reference.

*Attended to be  
true copy no fine*

*میرا کوک*

*2/19/2016*

7. That the appellant being aggrieved person, the instant revision petition is being filed, inter alia, on the following grounds.

**GROUND:**

- g. That the instant revision petition may kindly be considered as integral part of departmental appeal of the appellant.
- h. That the allegation of submitting fake documents is baseless and false, hence, the impugned dismissal order is not sustainable.
- i. That it is pertinent to mention here that the appellant has not been given a single chance of personal hearing, hence, the appellant condemn unheard which is against law and service rules.
- j. That no charge sheet, initial show-cause notice, final show cause notice and statement of allegations were issued against the appellant, in short no inquiry whatsoever had been conducted in the case of appellant, hence, the impugned dismissal order is against the norms of natural justice and liable to be set aside.
- k. That the impugned dismissal order is void ab initio, thus, no limitation is run in the case of appellant. Moreover, during this period, the appellant remained seriously ill, similarly the wife as well as children of appellant also suffered severe diseases and as a result of which the pecuniary position of the appellant became so weak that the appellant was unable to pursue his case.

*M. S. Sharma*

*Attested to be  
True copy*

*M. S. Sharma*

(64)

I. That the appellant is a poor fellow having family with children and there is no earning hand except the service of appellant; hence, the service of appellant is liable to be reinstated along with all back benefits.

It is, therefore, most humbly prayed that on acceptance of the instant revision petition on the departmental appeal the impugned void order dated 12/08/2010 may please be set aside and the appellant may kindly be reinstated into service with all back benefits.

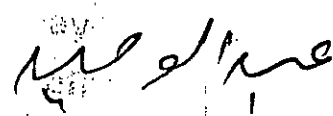
Dated 03/09/2020

Humble Appellant



**Abdul Waheed**  
son of Shaista Khan  
Caste Kundi, r/o Gul Imam  
Tehsil & District Tank  
Cell#0315-9880809

Ex-Cook Police Department  
District Tank

Attested to be  
True copy  




**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR. *T B D I K*

No.

Appeal No. *15908* of 20 *20*

*Abdul Wahood* Appellant/Petitioner

*PPO Peshawar* Respondent

Respondent No. *2*

Notice to: *Regional Police Officer (D/O)*  
*Tank Dillan*

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 *21-1-22* 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..... *22*

Given under my hand and the seal of this Court, at Peshawar this.....  
Day of..... *12 27*

*at camp court.*  
*P I Khan*

*[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.

TB D/K

Appeal No. 15908 of 20 20

Abdul Wahed Appellant/Petitioner

Versus

P/O Pesh Respondent

Respondent No. 3

Notice to: - DIST Police officer  
Tank

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 24/1/22 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 2

Day of..... 12 21

at camp court  
D/K

  
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. *TBDIK*

No.

Appeal No. *15908* of 20*20*

*Abdul Wahed* Appellant/Petitioner

*PPO Pesh* Versus

Respondent

Respondent No.

Notice to: *Provincial Police officers*  
*Peshawar*

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 *24-7-22* 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..... *22*

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

Day of.....*12-4*.....20

*of Camp Court*

*D/Khu*

*04/11*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal  
Peshawar.