BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, CAMP COURT SWAT

Service Appeal No 1235/2016

Date of Institution...

22.11.2016

Date of decision...

05.09.2017

Bacha Hussain Ex-Constable No.465, District Police, District, Swat.

(appellant)

Versus

1. The Regional Police Officer, Malakand, at Saidu Sharif, District Swat and another.

(Respondents)

Mr. Imdad Ullah

Advocate

For appellant

Mr. Muhammad Zubair,

District Attorney

For respondents.

MR. NIAZ MUHAMMAD KHAN,

CHAIRMAN

MR. AHMAD HASSAN,

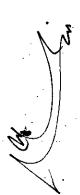
MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: - Arguments of the Learned Counsel for the appellant and learned District Attorney for the respondents heard and record perused.

FACTS

2. The appellant was retired from service vide impugned order dated 19.10.2016 from back date i.e 03.10.2011 against which he filed departmental appeal which was rejected on 14.11.2016 and thereafter appellant brought the instant appeal on 22.11.2016. The reason for the impugned order is that according to the medical certificate submitted by the appellant at the time of entry into service his age was 28 years and if his date



of birth is considered to be correct according to the medical certificate then his age of superannuation falls on 03.10.2011.

ARGUMENTS

- 3. Learned counsel for the appellant argued that medical certificate on which the authority had relied cannot be conclusive evidence of the age of the appellant as the same was not written on any scientific ground but only on the basis of appearance. That the appellant had disclosed his age as 28 years before the Medical Superintendent at the time of issuing of certificate. That the impugned order is, therefore, not sustainable in the eyes of law.
- 4. On the other hand the learned District Attorney argued that not only the medical certificate speaks about the age of the appellant as 28 years but his service record also affirms the same. The learned District Attorney referred to the service book of the appellant wherein the date of birth originally entered as 03.10.1951 both in figure and words. That in the figures 1 has been converted into 7. That in the words "fiftyone" is still intact. That the authority has rightly issued the impugned order.

CONCLUSION

5. After hearing both the learned counsel for the parties and perusing the record, this Tribunal is of the view that it was necessary for the authority issuing the retirement order to have probed into the matter whether any tampering was made in the record and whether the discrepancy between letters and figures has been made intentionally and which one of the two is correct because the date of birth written in figures is in harmony with the statement of the appellant before the Medical Officer whereas the date of birth written in words is in consonance with the medical certificate. But the



authority only referred to the medical certificate in the impugned order and not touched other aspects of the matter as discussed above. Therefore, this Tribunal by accepting this appeal directs the authority that before issuance of retirement order to probe the matter by taking into account all other facts including record of birth maintained at local level, if any, school record, if any, and NADRA record. The department is directed to complete the whole proceedings within a period of two months from the date of receipt of this judgment and then issue a fresh order on the basis of report failing which the appellant shall be deemed to have been reinstated in service and shall continue his service till his superannuation as alleged by him. Parties are left to bear their own costs. File be consigned to the record room.

az Muhammad Khan)

Chairman Camp Court, Swat

Member

Ahmad Hassan)

05.09.2017

09.02.2017

Appellant present in person and Mr. Khawas Khan, S>I (Legal) alongwith Mian Amir Qadar, GP for the respondents present. Requested for adjournment. To come up for written reply/comments on 06.04.2017 at camp court, Swat.

Charman Camp Court, Swat.

06.04.2017

Appellant in person present. Mr. Khawas Khan, S.I (legal) alongwith Mian Amir Qader, Government Pleader for respondents also present. Written reply by respondents submitted. To come up for rejoinder and arguments on 05.09.2017 before D.B at Camp Court Swat.

(MUHAMMAD AMIN KHAN KUNDI)

MEMBER

Camp Court Swat.

05.09.2017

Appellant alongwith counsel and Mr. Muhammad Zubair, District Attorney alongwith Khawas Khan, Si (Legal) for the respondents present. Arguments heard and record perused.

This appeal is accepted as per our detailed judgment of to-day. Parties are left to bear their own costs. File be consigned to the record room.

Member

<u>ANNOUNCE</u> 05.09.2017 Chairman
Camp court, Swat

08.12.2016

Learned counsel for the appellant argued that memorandum dated 14.11.2016 is in fact an order amounting to rejection of the mercy petition/departmental appeal of the appellant and as such the service appeal is maintainable.

Orders accordingly. Service appeal is therefore maintained.

Learned counsel for the appellant argued that date of birth of the appellant in service record is penning down as 03.10.1957. That vide impugned order dated 19.10.2016 appellant was retired from service w.e.f. 02.10.2011 and directions with regard to recovery of salary etc. against the appellant after the said date i.e. 02.10.2011 were also issued where-against appellant preferred departmental appeal on 04.11.2016 which was rejected on 14.11.2016 and hence the instant service appeal on 22.11.2016.

That the impugned orders are against facts and law as the appellant is to attain the age of superannuation on 02.10.2017.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 09.02.2017 before S.B at camp court, Swat. Till further orders the recovery shall not be made from the appellant.

Chauman Camp court, Swat



The appeal of Mr. Bacha Hussain Ex-Constable No. 465 Distt. Police Swat received today i.e. on 22.11.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

> Copy of rejection order of departmental appeal mentioned in the memo of appeal is not attached with the appeal which may be placed on it. Copy of order dated 14.11.2016 (Annexure-E) is not a rejection order of departmental appeal.

No. 1441 /S.T.

Dt. 22 /2016

YBER PAKHTUNKHWA PESHAWAR.

Mr. Aziz-ur-Rehman Adv. Swat.

Sio.

The appellant was communicated the same and informed that through the memo dated 14-11-2016 the departmental appeal has been filed. The fill may please be placed before the Honourable Tribunal along with observation as the same involves urgency and illegal recovery is going to made, apart from prematuse retisement.

23/11/2016 Azız-ur-Kahanan Advocate Swel

The observation of the office a very of compos for the oppulant is sub-ited for order place.

Holible Fixed before SB for 23/11/6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 235 of 2016

Bacha Hussain Ex-Constable No. 465, District Police, District Swat.

...Appellant

VERSUS

* The Regional Police Officer, Malakand, at Saidu Sharif, District Swat and Other.

...Respondents

INDEX

S.#	Description of documents	Annexure	Pages
1.	Memo of Appeal		1-5
2.	Affidavit		. 6
3.	Addresses of the parties		7
4.	Application for Interim Relief		8-9
5.	Affidavit		10
6.	Copy of the Relevant Page of Service Book	A	11
7.	Copy of the Order dated 19-10-2016	В	12
8.	Copies of the "Mads"	С	13-17
9.	Copy of the Departmental Appeal	D	18
10.	Copy of the Memo dated 14-11-2016	E	18
11.	Copy of the Pay Slip	F	20
12.	Vakalat Nama		21

Appellant Through

Aziz-ur-Rahman Advocate Swat

Office: Khan Plaza, Gulshone Chowk, Mingora Swat, Cell 0300 907 0671



<u>BEFORE THE KHYBER PAKHTUNKHWA</u> <u>SERVICE TRIBUNAL, PESHAWAR</u>

Service Appeal No. 1235 of 2016

Bacha Hussain Ex-Constable No. 465, District Police, Service Tribunal District Swat.

Dated <u>22/11/20/6</u> Appellant

VERSUS

- \$1. The Regional Police Officer, Malakand, at Saidu Sharif, District Swat.
- √2. The District Police Officer, District Swat, at Gulkada.

...<u>Respondents</u>

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER O.B. NO. 179 DATED 19-10-2016 WHEREBY THE APPELLANT IS NOT ONLY PREMATURELY RETIRED FROM **SERVICE** WITH RETROSPECTIVE EFFECT FROM 02-10-2011, BUT ORDER OF RECOVERY OF SALARIES TILL HAS ALSO BEEN MADE AGAINST THE LAW ANDRULES AND ISNOT SUSTAINABLE UNDER THE LAW. FEELING **AGGRIEVED** THE APPELLANT **PREFERRED** DEPARTMENTAL APPEAL WHICH WAS DISPOSED OFF VIDE MEMO: NO. 9538/E DATED SAIDU SHARIF, THE 14-11-2016 IN A VERY MECHANICAL AND CLASSICAL MANNER HAVING NO SUCH PRECEDENT, HENCE BOTH THE ORDERS ARE LIABLE TO BE SET ASIDE.

Filedto-day Small Registration-16



PRAYER:

That on acceptance of this appeal both the orders impugned may very kindly be set aside being void ab initio and reinstate the appellant till his actual date of retirement on superannuation, with all consequential benefits.

Respectfully Sheweth:

Facts:

- i. That the appellant joined the Police Force back in the year 1979 as constable and since then regularly permed his duties with great zeal and vigor.
- ii. That at the time of joining of the Police Force the date of birth of the appellant is recorded as 03-10-1957 by the authorities in the Service Book. Copy of the relevant page is enclosed as annexure "A".
- iii. That the appellant was regularly performing his duties without any objection of any sort either by the authorities or the general public and was planning to get retired on the due date in the year 2017 by attaining the age of superannuation under the law.
- iv. That to utter surprise a bolt from the blue fell on the appellant when he was issued his retirement order on attaining the age of superannuation vide order O.B. No. 179 dated 19-10-2016. Copy of the order dated 19-10-2016 is enclosed as Annexure "B".

- v. That the authorities are adamant enough that in the order impugned the appellant is retired by attaining the age of superannuation retrospectively i.e. 02-11-2011 and also that recovery be made for the over payment, strange enough for the period he remained in service and performed duties till the order impugned is issued. Copies of the various "mads" are enclosed as Annexure "C", showing the duties performed by the appellant.
- vi. That feeling aggrieved from the order impugned the appellant preferred a departmental appeal to the respondent No. 1 for setting aside the order impugned a being void ab initio, but the same is filed vide memo No. 9538/E dated Saidu Sharif, the 14-11-2016 in a very classical manner and without giving any reasons or even findings as to why the order impugned is not set aside. Copy of the appeal is enclosed as Annexure "D" and that of the memo dated 14-11-2016 is enclosed as Annexure "E", respectively.
- vii. That the appellant feeling aggrieved approached this Honourable Tribunal for the redressal of his grievance on the following grounds.

Grounds:

a. That under the law a Civil Servant is to be retired on attaining the age of superannuation, which is to be calculated from the date of birth recorded in the service book at the time of joining the service, but the same is not the case with the appellant and his age of superannuation is calculated from the sources



not finding any mention in his service record, thus the appellant has not been treated in accordance with the law and rules.

- b. That the appellant's date of birth as recorded in the service book by the authorities is 03-10-1957 and the same was lying in the custody of the respondents, yet the age of superannuation is wrongly been calculated and the appellant is relieved of his duties prematurely against the law and rules.
 - c. That this is a classic case of its kind wherein not only the age of superannuation is calculated wrongly, but even strange enough the same has been done with retrospective effect.
 - d. That the appellant was regularly performing his duties till the date the order impugned was passed and also received salaries legally till the same period as well. Copy of the pay roll is enclosed as Annexure "F".
 - e. That the appellant has neither moved an application for early retirement nor has committed any act of commission or omission which may constitute any offence under any law, or which may render him disqualified for further service.
 - f. That further strange enough when a Police Constable is to be retired on attaining the age of superannuation so under the Policy Guidelines "Promotion of Constable on Superannuation PG-4/2013 he is to be promoted C-II Head Constable,



but the same is ignored in case of the appellant without any reasons.

- g. That the respondents have misused their official authority and have used the same in a very colourful manner to the detriment of the appellant.
- h. That the respondents have used the authority not vested in them.
- i. That the appellant is wrongly been deprived of his legal and legitimate right without any reasons.

It is, therefore, very respectfully prayed that on acceptance of this appeal the orders impugned may very kindly be set aside being void ab initio and the appellant reinstated back into service with all back/consequential benefits.

Any other relief deemed appropriate in the circumstances and not specifically prayed for may also very kindly be granted.

Appellant

Bacha Hussáin

Through Counsels,

Aziz-ur-Rahman

Imdad Ullah

Advocates Swat



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2016

Bacha Hussain Ex-Constable No. 465, District Police, District Swat.

...Appellant

VERSUS

- 1. The Regional Police Officer, Malakand, at Saidu Sharif, District Swat.
 - 2. The District Police Officer, District Swat, at Gulkada.

... Respondents

<u>AFFIDAVIT</u>

It is solemnly stated on Oath that all the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has either been misstated or kept concealed before this Honourable Tribunal.

ATTESTED

<u>Ident</u>ified By:

Advocate Swat

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2016

Bacha Hussain Ex-Constable No. 465, District Police, District Swat.

...<u>Appellant</u>

VERSUS

The Regional Police Officer, Malakand, at Saidu Sharif, District Swat and Other.

...Respondents

ADDRESSES OF THE PARTIES

Appellant:

Bacha Hussain Ex-Constable No. 465, District Police, District Swat.

Respondents:

- 1. The Regional Police Officer, Malakand, at Saidu Sharif, District Swat.
- 2. The District Police Officer, District Swat, at Gulkada.

Appellant Through Counsel,

Advocate Swat



<u>SERVICE TRIBUNAL, PESHAWAR</u>

Service Appeal No. _____ of 2016

Bacha Hussain Ex-Constable No. 465, District Police, District Swat.

.Applicant/Appellant

VERSUS

The Regional Police Officer, Malakand, at Saidu Sharif, District Swat and Other.

...<u>Respondents</u>

APPLICATION FOR GRANT OF INTERIM RELIEF.

Respectfully Sheweth:

- a. That the above titled case is pending before this Honourable Tribunal, in which no date of hearing is fixed as yet.
- b. That the appellant has got prima facie case in his favour.
- c. That the balance of convenience is also in favour of the appellant.
- d. That if the interim relief in the shape of suspension of the operation of the order impugned is not stopped the appellant will suffer irreparable loss.



It is, therefore, very respectfully prayed that on acceptance of this application the operation of the order impugned may very kindly be suspended till the final disposal of the appeal.

Applicant/Appellant

Bacha Hussain Through Counsels,

Aziz-ur-Rahman

Imdad Ullah Advocates Swat



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____ of 2016

Bacha Hussain Ex-Constable No. 465, District Police, District Swat.

...<u>Appellant</u>

VERSUS

The Regional Police Officer, Malakand, at Saidu Sharif, District Swat and Other.

...Respondents

AFFIDAVIT

It is solemnly stated on Oath that all the contents of this application are true and correct to best of my knowledge and belief and nothing has either been misstated or kept concealed before this Honourable Tribunal.

> Deponent Follow

Bacha Hussain

<u>Identified By:</u>

, Imdad Ullah Advocate Swat ATTESTED

REMARKS ASHROF RANGE

ONE OF THE STREET RANGE

ONE OF THE STR

District AND SERVICE FIGURE OF Solution of sand characters and debated that is known been appropriated and continued to the provide of the p						///
Distract.		, .	Annexure		d.	ツ
Distract.		٠.	·······································			
Distract. Distra		(MA) / I (MA) / I (MA)	. ·	** •	60	See .
Direction Dire	Character and Se	KASCE STOFF OF		•	46	-
Name Father's Name	Water All Toy I I	•	•			
Period of and character and actual that I have been appointed under section g of the legister Act (* of this), and the purpose of their section of according from the province of the register Act (* of this), and the purpose of their section of according from the province of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of according from the province of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of the register Act (* of this), and the purpose of their section of this section of this section of their section of thi		•	• •	•	2	
Nature Father's Name Father's Name Father) LIA		11 15 15 15 15 15 15 15 15 15 15 15 15 1	1	
Vertification Roll No. dated received back and attached to the Panji Mirjal. Government Service prior to present empolyment, which is approved for passion service. Service or department Rouk or Grade Pay of last Applintrons From To Your, Mornita Days Done of and character on discharge from Service Service in the Police Department and the provision of the Act and of the Pales is smooth under it and grown from the Pales Department and the provision of the Act and of the Pales is smooth under it and grown from the Pales Department and the provision of the Act and of the Pales is smooth under it and grown from the Pales and Pales Act W of 1801, and the purport of that the same than the pales of the			Office		100	
Service or department Rank or Grade Pay of last Appointment From To Years Months Days Service or department Rank or Grade Pay of last Appointment From To Years Months Days Agreement—I understand that I have been appointed under section yei the Policy left (V of Sta) and the purpert of their field the performance of the Policy service for person when the performance of the Policy service for person for the Policy service for person for the Policy service for person of the Policy service for person for the Policy			aph (neut E	ent ent
Service or department Runk or Grade Pay of last Appointment Prom To Yearn Months Days Service or department Runk or Grade Pay of last Appointment Prom To Yearn Months Days Agreement—I understand that I have been appointed under service in the Runk or Grade Pay of last Appointment when service for peason shows service in the paper of the Pay of last last of last last of last last last last last last last last	Name .	Father's Name	sto Fown		Buron Buron	mon mon mon selection
Verification Roll No. dated received back and attached to the Faul Migal. Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Yours Months Days Conver of and characters and the service of the Pay of last Appointment Rank or Grade Pay of last Pay of Reference to ordina approving above service for pension genetic for pension genetic for the province of the service of the pension of the Pay of t				ince	Mean 1	ਰ ਵਿੱਚ ਤੋਂ
Verification Roll No. dated. received back and attached to the Fault Miss). Government Service prior to protest empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appliatment From To Years Months Days Consec of and obstractes on discharge from Above service for pension decrease to orders approving doors service for pension extraction of an obstractes Agraement—I understand that I have been appointed under section; of the Police Act, ("or 1804), and the purport of their Testions are explorated to an I gave to corve furthfully under the provision, of the told Police Act, ("or 1804), and the purport of their Testion to an I gave to corve furthfully under the provision, of the told Police Act, ("or 1804), and the purport of their Testion to an I gave to corve furthfully under the provision, of the told Police Act, ("or 1804), and the purport of their Testion to an I gave to corve furthfully under the provision, of the told Police Act, ("or 1804), and the purport of their Testion to an I gave to corve furthfully under the provision, of the told Police Act, ("or 1804), and the purport of their Testion to appoint the provision of the Testion of the Testion to a section to a product of appointment sensed to the Police Act, ("or 1804), and the purport of their Testion to appoint the provision of the Testion to a section to a production of appointment sensed to the Police Act, ("or 1804), and the purport of their Testion to appoint the provision of the Testion to a section to		·	fribo Villag Post a	Distri	Dato Meigi Chest	Deta Dise
Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Years Months Days Cause of and character on discharge from above service premains above service premains ervice in ment. Appearant—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that was to make the purport of that was the purport of that was to make the purport of that was to make the purport of that was the purport of the purport of that was the purport of that was the purport of the purport of that was the purport of the purport					-,08	1 13
Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Years Months Days Days of and character on discharge from above service premaion service in months above service premaion of the Act and of the Rules behaved durit and now in force, by which my discipline and conduct are coverned, the number of the Act and of the Rules behaved durit and now in force, by which my discipline and conduct are coverned, the said Police Act (V of 1861), and the purport of that "set in month and the purport of that "set in month and the purport of the police and to obey all lawful redgers issued to make by my Superior Officers and undertake not to resign my appointment within three years from the date of my enceiment. I have been appointment issued under section 8 of the Police Act (V of 1861). Rolled impression of fingers and thumb of left hand. Left little Left ring Left middle Left index Left thumb		:		- g		7
Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Years Months Days Cause of and character on discharge from above service for pumbon service in ment. Agreement.—I understand that I have been appointed under section 7 of the Balles Act W of 1861, and the purport of that independent of the Rates for provinces of the said Policy line and conduct are poverned, by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Soil Policy Act and 'co obey all lawful creater issued to the resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Police Act (V of 1861). References to orders approving above service for provinces of the said Policy Index Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Police Act (V of 1861). References to orders approving above service for provinces of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater is and the purport of the said Policy Act and 'co obey all lawful creater is a said purport of the said Policy Act and 'co obey all lawful creater is a said purport of the said Policy Act and 'co				M	8	1
Government Service prior to present empolyment, which is approved for pension service. Survice or department Rank or Grade Pay of last Appointment From To Years Months Days				The Par	18 74	
Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Years Months Days Cause of and character on discharge from above service in panton ments. Department is a service in ments. Agreement.—I understand that I have been appointed under section 7 of the Bolice Act W of 1861, and the purport of that is a service in ments. Department is ments in Department of the Act and of the Rade beaution of the Service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of the safe policy and the purport of the safe policy and the safe policy and institut circles issued to safe by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Bolice Act (V of 1861). Section 1861 and 1862 are provided as a section 2 of the Police Act (V of 1861). Section 2862 are provided as existing the safe policy and the purport of the safe policy and the safe policy and the purport of the safe policy and the safe policy and the safe policy and the safe policy and the purport of the safe policy and the sa		1		8 8		N 9
Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Years Months Days Cause of and character on discharge from above service in panton ments. Department is a service in ments. Agreement.—I understand that I have been appointed under section 7 of the Bolice Act W of 1861, and the purport of that is a service in ments. Department is ments in Department of the Act and of the Rade beaution of the Service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of the safe policy and the purport of the safe policy and the safe policy and institut circles issued to safe by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Bolice Act (V of 1861). Section 1861 and 1862 are provided as a section 2 of the Police Act (V of 1861). Section 2862 are provided as existing the safe policy and the purport of the safe policy and the safe policy and the purport of the safe policy and the safe policy and the safe policy and the safe policy and the purport of the safe policy and the sa		1		1 1 1 V	スパック	
Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Years Months Days Cause of and character on discharge from above service in panton ments. Department is a service in ments. Agreement.—I understand that I have been appointed under section 7 of the Bolice Act W of 1861, and the purport of that is a service in ments. Department is ments in Department of the Act and of the Rade beaution of the Service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of the safe policy and the purport of the safe policy and the safe policy and institut circles issued to safe by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Bolice Act (V of 1861). Section 1861 and 1862 are provided as a section 2 of the Police Act (V of 1861). Section 2862 are provided as existing the safe policy and the purport of the safe policy and the safe policy and the purport of the safe policy and the safe policy and the safe policy and the safe policy and the purport of the safe policy and the sa		W.		Al of p		
Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Years Months Days Cause of and character on discharge from above service in panton ments. Department is a service in ments. Agreement.—I understand that I have been appointed under section 7 of the Bolice Act W of 1861, and the purport of that is a service in ments. Department is ments in Department of the Act and of the Rade beaution of the Service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of that is a service in the safe policy and the purport of the safe policy and the purport of the safe policy and the safe policy and institut circles issued to safe by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Bolice Act (V of 1861). Section 1861 and 1862 are provided as a section 2 of the Police Act (V of 1861). Section 2862 are provided as existing the safe policy and the purport of the safe policy and the safe policy and the purport of the safe policy and the safe policy and the safe policy and the safe policy and the purport of the safe policy and the sa	N.	The state of the s	8 8	of While		
Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Years Months Days Cause of and character on discharge from above service for pumbon service in ment. Agreement.—I understand that I have been appointed under section 7 of the Balles Act W of 1861, and the purport of that independent of the Rates for provinces of the said Policy line and conduct are poverned, by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Soil Policy Act and 'co obey all lawful creater issued to the resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Police Act (V of 1861). References to orders approving above service for provinces of the said Policy Index Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Police Act (V of 1861). References to orders approving above service for provinces of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater is and the purport of the said Policy Act and 'co obey all lawful creater is a said purport of the said Policy Act and 'co obey all lawful creater is a said purport of the said Policy Act and 'co			6 8 8	13 11	9	n 50
Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Years Months Days Cause of and character on discharge from above service for pumbon service in ment. Agreement.—I understand that I have been appointed under section 7 of the Balles Act W of 1861, and the purport of that independent of the Rates for provinces of the said Policy line and conduct are poverned, by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Soil Policy Act and 'co obey all lawful creater issued to the resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Police Act (V of 1861). References to orders approving above service for provinces of the said Policy Index Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the resign my appointment within three years from the date of my enrolment. I have recipied a cavificate of appointment issued under section 8 of the Police Act (V of 1861). References to orders approving above service for provinces of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater issued to the purport of the said Policy Act and 'co obey all lawful creater is and the purport of the said Policy Act and 'co obey all lawful creater is a said purport of the said Policy Act and 'co obey all lawful creater is a said purport of the said Policy Act and 'co		\$	9 70 0	1 3	M	7 6
Government Service prior to present empolyment, which is approved for pension service. Service or department Rank or Grade Pay of last Appointment From To Years Months Days Cause of and character on discharge from above service for pension service in months above service for pension of the Act and of the Rules benefit of the successful to an unit the provisions of the Act and of the Rules benefit of the successful to an unit the provisions of the Act and of the Rules benefit of the successful to an unit the provisions of the Act and of the Rules benefit of the successful to an unit the provisions of the Act and of the Rules benefit of the successful to the provisions of the Act and of the Rules benefit of the successful to the provisions of the Act and of the Rules benefit of the successful to the provisions of the Act and of the Rules benefit of the successful to the provisions of the Solice Act (V of 1861), and the purport of that "set to an unit the provisions of the Act and conduct are coverned, the successful to the provisions of the Act and conduct are coverned, the successful to the purport of that "set to an unit to provisions of the Solice Act (V of 1861), and the purport of that "set to an unit to provision of the Police Act and to the purport of that "set to an unit to provision of the Police Act (V of 1861), and the purport of that "set to an unit to a provision of the Police Act (V of 1861), and the purport of that "set to an unit to a provision of the Police Act (V of 1861) and the purport of that "set to a provision of the Police Act (V of 1861) and the purport of that "set to a provision of the Police Act (V of 1861) and the purport of that "set to a provision of the Police Act (V of 1861) and the purport of that "set to a provision of the Police Act (V of 1861) and the purport of that "set to a provision of the Police Act (V of 1861) and the purport of that "set to a provision of the Police Act (V of 1861) and the purport of that "set to a provision of the Act and conduct are considered to a		<u> </u>	1 7 . 7		7-0	A STATE OF THE STA
Service or department Rank or Grade Pay of last Appointment From To Years Months Days Days of and character on discharge from above service for pension service in the Police Department. Agreement.—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "section and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline and conduct are powerned, have been explained to ma. I agree to service statistically under the provisions of the after Police Act (V of 1861), and the purport of that "section are the purport of the Rules issued under the provisions of the after Police Act (V of 1861), and the purport of that "section are the purport of the Rules issued to other purposes of the Police Act (V of 1861). **Reference to orders approving above service for pension service in the Police Act (V of 1861), and the purport of that "section are the purpose of the Rules issued to other purposes." **Agreement.*—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "section are the purpose of the Police Act (V of 1861), and the purport of that "section are the purpose of the Police Act (V of 1861), and the purport of that "section are the purpose of the Police Act (V of 1861), and the purport of that "section are the purpose of the Police Act (V of 1861), and the purport of that "section are the purpose of the Police Act (V of 1861), and the purpose of the Police Act (V of 1861). **Agreement.*—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "section are the purpose of the Police Act (V of 1861), and the purpose of the Police Act (V of 1861), and the purpose of the Police Act (V of 1861), and the purpose of the Police Act (V of 1861), and the purpose of the Police Act (V of 1861), and the purpose of the Police Act (V of 1861), and the purpose of the Police Act (V of 1861), and the purpose of the Police Act	Verification Roll No.	dated .	received back at	nd attached to the	Fanji Mişal.	
Service or department Rank or Grade Pay of last Appointment From To Years Months Days Dause of and character on discharge from Source of pension service in the Police Department. Agreement.—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "set it an and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline, and conduct are poverned, says been explained to to It agree undertake not to resign my appointment within three years from the date of my enrolment. I are moved a cardificate of appointment issued under section 8 of the Police Act (V of 1861). Rolled impression of fingers and thumb of left hand. Left little Left ring Left middle Left index: Left thumb Attested Left thumb	Government Services	e prior to present empol	yment, which is approve	ed for pension servi	ice.	
Reference to orders approving above service for pension service in the Police Department. Agreement.—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "see that and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline and conduct are governed, is the pension of the Act and of the Rules issued under it and now in force, by which my discipline and conduct are governed, is the pension of the Act and of the Rules issued under section as of the said Police Act of to deep all lawful refer issued to by a required a certificate of appointment issued under section 8 of the Police Act (V of 1861). Reference to orders approving above service for pension service in the Police Act (V of 1861), and the purport of that "see that and the provisions of the Police Act (V of 1861). Reference to orders approving above service for pension service in the Police Act (V of 1861), and the purport of that "see that a purport of the Police Act (V of 1861), and the purport of that "see that and the purport of the Police Act (V of 1861), and the purport of that "see that a purport of the Police Act (V of 1861), and the purport of that "see that a purport of the Police Act (V of 1861), and the purport of that "see that a purport of the Police Act (V of 1861), and the purport of that "see that "see that "see that "see the Police Act (V of 1861), and the purport of that "see				<u> </u>	. PE	RIOD STATE
Danse of and character One of incharge from Agreement.—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "section been reprised to the Act and of the Rules issued under it and now in force, by which my discipline and conduct are governed, have been explained to me. I agree to surve individually under the provisions of the Act and of the Rules issued to see by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have received a condition of ingers and thumb of left hand. Loft little Left ring Left middle Left index Left thumb	hite and a					TOTAL STATE OF THE
Dause of and character on discharge from above service for pension service in the Police Department. Agreement.—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "section and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline-and conduct are coverned, been emplained to me. I agree to sorve intelligible under the sud row in the sud roller Act (V of 1861), and the purport of that "section is by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have received a cardificate of appointment issued under section 8 of the Police Act (V of 1861). Reference to orders' approving above service for pension service in the Police Act (V of 1861), and the purport of that "section in the discretization of the service in the Police Act (V of 1861). Reference to orders' approving above service for pension service in the Police Act (V of 1861), and the purport of that "section in the discretization of the Superior Superi	Service or department	Rank or Grade Pa	ay of last Appointment	From To		
Reference to orders approving above service for pension service in the Polica Department.—I understand that I have been appointed under section 7 of the Polica Department. Agreement.—I understand that I have been appointed under section 7 of the Polica Department. Agreement.—I understand that I have been appointed under section 7 of the Polica Act (V of 1861), and the purport of that "section and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline and conduct are governed, on any been emplained to me. I agree to cover shift-bully under the provisions of the said Polica Act and "to obey all lawful orders issued to make the my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have received a castificate of appointment issued under section 8 of the Polica Act (V of 1861). Reference to orders approving above service for pension gave received in the Polica Act (V of 1861), and the purport of that "section and the purport of the pu	Service or department	Rank or Grade P	ay of last Appointment		Years Mo	
Cause of and character on discharge from above service to pension service to pension service for pension service in the Police Department.—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "section and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline and conduct are governed, have been explained to me. I agree to sorve faithfully under the provisions of the safe folice Act and to obey sait insural orders issued to supplement of the safe pension and undertake not to resign my appointment within three years from the date of my enrolment. I have received a cardificate of appointment issued under section 8 of the Police Act (V of 1861). This. Cause of and character of near appointment within three years from the date of my enrolment. I have received a cardificate of appointment issued under section 8 of the Police Act (V of 1861). This. Cause of and character of near appointment in the Police Act (V of 1861), and the purport of that "section and the purport of the p	Service or department	Rank or Grade P	ay of last Appointment		Years Mo	ntbs Days
Cause of and character on discharge from above service. Agreement.—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "section and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline- and conduct are governed, and the purport of Officers and undertaken on to resign my appointment within three years from the date of my enrolment. I have been appointment issued under section 8 of the Police Act and 6 of the pull lawful crear issued to my my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have been appointment issued under section 8 of the Police Act (V of 1861). Reference avoided Act (V of 1861), and the purport of that "section and the provisions of the Superior Officers and conduct are governed, and the provisions of the Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have been appointment issued under section 8 of the Police Act (V of 1861). Reference avoided in the Police Department. Reference avoided in the Police Department. Reference avoided in the Police Act (V of 1861), and the purport of that "section and the purport of the Police Act (V of 1861), and the purport of that "section and the purport of the Police Act (V of 1861), and the purport of that "section and the purport of the Police Act (V of 1861), and the purport of the Police Act (V of 1861), and the purport of the Police Act (V of 1861), and the purport of the Police Act (V of 1861), and the purport of the Police Act (V of 1861), and the purport of the Police Act (V of 1861), and the purport of the Police Act (V of 1861), and the purport of the Police Act (V of 1861), and the purport of the Police Act (V of 1861), and the purport of the Police Act (V of 1861), and the purport of the Police Act (V of 1861), an	Service or department		<u> </u>		Years Mo	nths Days
discharge from above service in the Police Department. Agreement.—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "section and the provisions of the Act and of the Rules issued under it and now in force, by which my disciplina, and conduct are governed, have been explained to me. I agree to sorve faithfully under the provisions of the said Police Act and "co obey all lawful orders issued to saie by my Superior Officers and undertake not to resign my appointment within three years from the date of my carolinome. I have received a certificate of appointment issued under section 8 of the Police Act (V of 1861). But the Left index Left ring Loft middle Left index Left thumb	Service or department		<u> </u>		Years Mo	nths Days
Agreement.—I understand that I have been appointed under section 7 c.i the Police Act (V of 1861), and the purport of that "section and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline and conduct are governed, here been explained to me. I agree to sorve faithfully under the provisions of the said Police Act and To obey all lawful orders issued to like by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have received a cavificate of appointment issued under section 8 of the Police Act (V of 1861). Date: Loft little Loft ring Left middle Left index Left thumb				Reference to or	Years Mo	nths Days
Agreement.—I understand that I have been appointed under section 7 of the Police Act (V of 1861), and the purport of that "section and the provisions of the Act and of the Rules issued under it and now in force, by which my discipline and conduct are governed, have been explained to me. I agree to sorve faithfully under the provisions of the said Police Act and "to obey all lawful orders issued to me by my Superior Officers and undertake not to resign my appointment within three years from the date of my enrolment. I have received a cavificate of appointment issued under section 8 of the Police Act (V of 1861). Jule	Cause of and character on discharge from			Reference to or above service in the I	Years Mo	nths Days
3. Rolled impression of fingers and thumb of left hand. Left little Left ring Left middle Left index Attested Advocate Advocate	Cause of and character on discharge from			Reference to or above service in the I	Years Mo ders approving or pension Police Depart	ntbs Days
3. Rolled impression of fingers and thumb of left hand. Left little Left ring Left middle Left index Attested Advocate Advocate	Cause of and character en discharge from above service.			Reference to or above service in the I	Years Mo ders approving or pension colice Depart at.	nths Days
7. Signature 15. Rolled impression of fingers and thumb of left hand. Left little Left ring Left middle Left index Attested Advocate Advocate	Cause of and character en discharge from above service.			Reference to or above service in the I	Years Mo ders approving or pension colice Depart at.	nths Days
3. Rolled impression of fingers and thumb of left hand. Left little Left ring Left middle Left index Left thumb Attested Advocate	Cause of and character en discharge from above service.			Reference to or above service in the I	Years Mo ders approving or pension colice Depart at.	nths Days
East little Left ring Left middle Left index Left thumb Attested Advocate	Cause of and character on discharge from above service. Agreement.—I understation and the provisions of the bays been explained to ma. I me by my Superior Officers have received a cavificate of			Reference to or above service in the I	Years Mo ders approving or pension colice Depart at.	nths Days
Loft little Left ring Left middle Left index Attested August Advocate	Cause of and character on discharge from above service. Agreement.—I understand the provisions of the bave been explained to ma. I me by my Superior Officers have received a cavificate of			Reference to or above service in the I mer of the Police Act (force, by which the said Police Act within three of Act (V of 1861).	Years Mo ders approving or pension colice Depart at.	nths Days
Attesteu	Agreement.—I understand the provisions of the tay been explained to ma. I me by my Superior Officers have received a certificate of These	and that I have been app Act and of the Rules issuagree to sorve faithfully and undertake not to appointment issued under	pointed under section 7 led under it and now in andar the provisions of resign my appointment a section 8 of the Police	Reference to or above service in the I mer or the Police Act (force, by which the said Police Act (v of 1861).	Years Mo ders approving or pension colice Depart at.	nths Days
Advocate	Agreement.—I understand the provisions of the tay been explained to ma. I me by my Superior Officers have received a certificate of These	and that I have been app Act and of the Rules issuagree to sorve faithfully and undertake not to appointment issued under	pointed under section 7 led under it and now in andar the provisions of resign my appointment a section 8 of the Police	Reference to or above service in the I mer or the Police Act (force, by which the said Police Act (v of 1861).	Years Mo ders approving or pension colice Depart at.	nths Days
	Cause of and character on discharge from above service. Agreement.—I understation and the provisions of the flave been explained to ma. I me by my Superior Officers have received a cavificate of This. Rolled impression	and that I have been app Act and of the Rules issu- agree to sorve faithfully a and undertake not to appointment issued under the of fingers and the	pointed under section 7 led under it and now in and at the provisions of resign my appointment at section 8 of the Police umb of left hand Left middle	Reference to or above service is service in the I mer of the Police Act (force, by which the said Police Act within three of Act (V of 1861).	Years Mo Mere approving or pension Police Depart at. V of 1861), and the my discipline and to the and to date	purport of that secondact are governed, wful rders issued to of my enrolment. I
	Cause of and character on discharge from above service. Agreement.—I understation and the provisions of the flave been explained to ma. I me by my Superior Officers have received a cavificate of This. Rolled impression	and that I have been app Act and of the Rules issu- agree to sorve faithfully a and undertake not to appointment issued under the of fingers and the	pointed under section 7 led under it and now in and at the provisions of resign my appointment at section 8 of the Police umb of left hand Left middle	Reference to or above service is service in the I mer of the Police Act (force, by which the said Police Act within three of Act (V of 1861).	Years Mo Mere approving or pension Police Depart at. V of 1861), and the my discipline and to the and to date	purport of that secondate are governed, wful refers issued to of my enrolment. I
	Cause of and character on discharge from above service. Agreement.—I understation and the provisions of the have been explained to ma. I me by my Superior Officers have received a cardificate of Unite. Rolled impression	and that I have been app Act and of the Rules issu- agree to sorve faithfully a and undertake not to appointment issued under the of fingers and the	pointed under section 7 led under it and now in and at the provisions of resign my appointment at section 8 of the Police umb of left hand Left middle	Reference to or above service in the I mer coi the Police Act (force, by which the said Police Act (within three of Act (V of 1861).	Years Mo ders approving or pension Police Depart at. V of 1861), and the my discipline and co obey all is years from the date	purport of that secondate are governed, wful refers issued to of my enrolment. I
	Cause of and character on discharge from above service. Agreement.—I understation and the provisions of the flave been explained to ma. I me by my Superior Officers have received a cavificate of This. Rolled impression	and that I have been app Act and of the Rules issu- agree to sorve faithfully a and undertake not to appointment issued under the of fingers and the	pointed under section 7 led under it and now in and at the provisions of resign my appointment at section 8 of the Police umb of left hand Left middle	Reference to or above service in the I mer coi the Police Act (force, by which the said Police Act (within three of Act (V of 1861).	Years Mo ders approving or pension Police Depart at. V of 1861), and the my discipline and co obey all is years from the date	purport of that secondate are governed, wful refers issued to of my enrolment. I
	Cause of and character on discharge from above service. Agreement.—I understation and the provisions of the flave been explained to ma. I me by my Superior Officers have received a cavificate of This. Rolled impression	and that I have been app Act and of the Rules issu- agree to sorve faithfully a and undertake not to appointment issued under the of fingers and the	pointed under section 7 led under it and now in and at the provisions of resign my appointment at section 8 of the Police umb of left hand Left middle	Reference to or above service in the I mer coi the Police Act (force, by which the said Police Act (within three of Act (V of 1861).	Years Mo ders approving or pension Police Depart at. V of 1861), and the my discipline and co obey all is years from the date	purport of that secondate are governed, wful refers issued to of my enrolment. I
	Cause of and character on discharge from above service. Agreement.—I understation and the provisions of the bays been explained to ma. I me by my Superior Officers have received a cavificate of the Characteristics. Rolled impression	and that I have been app Act and of the Rules issu- agree to sorve faithfully a and undertake not to appointment issued under the of fingers and the	pointed under section 7 led under it and now in and at the provisions of resign my appointment at section 8 of the Police umb of left hand Left middle	Reference to or above service in the I mer coi the Police Act (force, by which the said Police Act (within three of Act (V of 1861).	Years Mo ders approving or pension Police Depart at. V of 1861), and the my discipline and co obey all is years from the date	purport of that secondate are governed, wful refers issued to of my enrolment. I

06 06 86,11 48 Si Annexure C الله والكي موريال المال مال ماله والله والمال مولايل والكي المال المال المال مولايل والكي المال مولايل والكيور الموريال والكيور الموريال والكيور الموريال والكيور الموريال والكيور الموريال مولايل والكيور الموريال والكيور الموريال مولايل والكيور الموريال مولايل والكيور الموريال مولايل والكيور الموريال مولايل الموريال مولايل الموريال مولايل الموريال مولايل الموريال مولايل الموريال 1. Ugulgeriler rile of the well for

On attaining age of superannuation i.e 60 years Constable Bacha Flussain No.465 of this district Police is hereby retired on superannuation pension in the light Medical Certificate dated 03/10/1979 placed in his Service Roll, with effect from 02/10/2011 (A.N). The overpayment of pay shall be made from his lump sump payment gratuity with effect from 03/10/2011.

District Police Officer, Swat.

O.B. No. 179 Dated 19-12-12016.

OFFICE OF THE DISTRICT POLICE OFFICER, SWAT.

/E, dated Gulkada the, ___

Copies to:-

- District Accounts Officer, Swat for necessary action.
- Pay Officer.

District Police Officer, Swat

Attested

Advocate

Attesteu.

Elip: 06 06 86,11 48 Se Optionia Lis ille reaction of of er & 05:45 Les ASI Ule, de , in Chiles 48 No 2465 4 wind got 126 of the Ork oft 351 x 6,69 1996 · Un Consider vila Ble willy أمعار العل ع MM: Ps. Mingors

Attested MAN Advocate

٥

10-76 36,00 gg po (hi 10 7 700 2'05145 Cio ASA Obie and 610 44 0 2,06 June 2 1696 , Lûs. 6/10 6 6/10 20 au vie mi म्रेस्टिंग मुंद्री है राहुल ने वी ट्राफ प्राहित ने वी ट्राफ 1 Jav: 65,910 9/10 les êns ins Let cin fles MM: 85 Minh 069 16-11-016

Attested Medicate

Wife. 03 08 (50) 59 (6) 5/6/ 2 m 20/6 35/60 35/60 35/60 35/60 (-0 m by the del ose 465 020 6 1 19 65 00 6 16 660 E Julijo MM PSMingona 16-11-016

Attested | Modern Advocate

نم در که درنافی ماه ماه Curto لام فرگوزه Jis 6,40 8 0 19 6 6 1 6 6 1 251 (251 6 1676) 1696 , Lie देशकी के उसे मेर के कर हो है। AMER PS MINSORA 2106 mg by 10 per 14 10 20 2 08:00 cie si olino 60 file 57 20 Je by very 465 cinge 1 phil & Jit of Of and 351 who تستن عارج نفائه روونه سرما سع 2 Holl F AME PS Mugoda

Attested

Attentei

Advocate

2 Janosie

121226 CELUE, 310 P.1

با - عالى! ا

of the State

Attested And Shares

1810/610 Low Soul C 1092001 6a Programos 594 agra Dist 9 16 60 Digit (Color of 2) (2) (2) (2) (2) (2) (2) (2) (2) Jing com was subjalled ut 40/26-19/20/20 00 10/2/2/2 10/02 00 william (ab) y my & ad 1108 & sight (12 2). 3/2/20 F281-80-61 9 80.05 UN 3 8 50/1/20/4(1) 110 on in 1816 Dester 26.10: - (6/m) (m) (2/2). 10000 62-188 De Mill 13 Malling

Annexure E (13)

From:

The Regional Police Officer, Malakand, at Saidu Sharif, Swat.

To

The District Police Officer, Swat.

No. 9538 /E, dated Saidu Sharif, the 14-1/- /2016.

Subject:

MERCY PETITION.

Memorandum:

Please refer to your office memo No. 13627/E, dated 04/11/2016.

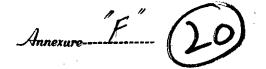
Mercy petition of Retired Constable Badshah Hussain No. 665 of

Swat District has been examined and seen by Worthy Regional Police Officer, Malakand.

(OFFICE SUPDT:)
For Regional Police Officer,
Malakand, at Saidu Sharif Swat

Attacted

Advocate



Gazetted/Non-Gazetted: N

Buckle No.: 465

522.00

REPAID

PRINCIPAL

INCOME TAX 2,078.40

GPF#: POLSW001679

BALANCE

1,557.36

162,753.00

(80237541) Grade: 05 NTN: 0 00076754 BACHA HUSSAIN CNIC: 1560290405691 Desig: CONSTABLE PAYMENTS LOAN/FUND AMOUNT DEDUCTIONS AMOUNT 21,190.00 3005 GPF Subscription - Rs 745.00-0001 Basic Pay 7.00-1000 House Rent Allowance 1,002.00 3511 Addl Group Insurance 1,932.00 3530 Police wel:Fud BS-1 t 424.00-1210 Convey Allowance 20 67.00-1300 Medical Allowance 1,500.00 3604 Group Insurance 1547 Ration Allowance 681.00 3609 Income Tax 174.00-1567 Washing Allowance 150.00 1646 Constabilary R Allow 300.00 1901 Risk Allowance (Poli 5,010.00 1902 Special Incentive Al 775.00 1,000.00 1911 Compen Allow 20% (1-1933 Special Risk Allowan 3,000.00 2148 15% Adhoc Relief All 660.00 2,730.00 2168 Fixed Daily Allowanc 2199 Adhoc Relief Allow @ 429.00 2211 Adhoc Relief All 201 2,119.00

41,061.00 01.09.2016 30.09.2016 **PAYMENTS** 1,417.00-**NET PAY** 42,478.00 **DEDUCTIONS**

NEW ROAD, MINGORA SWAT. **SWAT** Accnt.No: 7900358103 **NEW ROAD, MINGORA SWAT.** HABIB BANK LIMITED Branch Code:221276

Attested

KHYBER PAKHTUNKHWA SERVI

In the matter of:-



15acha Hullains
VERSUS
The RPO malakano

KNOWN ALL to whom these present shall come that I/we, the undersigned appoint

AZIZ-UR-RAHMAN and IMDAD ULLAH

Advocates High Court

To be the advocate for the Apple Co in the above mentioned case to do all the following acts, deeds and things or any one of them, that is to say:-

- To acts, appear and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or revision or execution or at any other stage of its progress until its final decision.
- * To present pleadings, appeals, cross objections or petitions for execution review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of the said case in all its stages.
- ❖ To withdraw or compromise the said or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
- To receive money and grant receipts therefore, and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
- To employ any other Legal Practitioner authorizing him to exercise the power and authorities hereby conferred on the Advocate wherever he may think fit to do so.
- ❖ I understand that the services of aforesaid lawyer are hired irrespective of the outcome of the

And I/We hereby agreed to ratify whatever the advocate or his substitute shall to do in the said premises.

And I/We hereby agree not to hold the Advocate or his substitute responsible for the result of the said case in consequences of his absence from the Court when the said case is called up for hearing.

And I/We hereby agree that in the event of the whole or any part of the fee agreed by me/us to be paid to the Advocate remaining unpaid, the Advocate shall be entitled to withdraw from the prosecution of the case until the same is paid.

IN THE WITNESS WHEREOF I/WE hereunto set my/our hand(s) to these present the contents of

(Signature or thumb impression)

(Signature or thumb impression)

Accepted subject to terms regarding fees

ZIZ-UR-RAHMAN)

Advocate High Court

Office: Khan Plaza, Gulshone Chowk G.T. Road Mingora, District Swat.

Cell No. 0300 907 0671

(IMDAD ULLAH)

Advocate High Court

Office: Khan Plaza, Gulshone Chowk, G.T. Road, Mingora, District Swat

Cell No. 0333 929 7746

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No.1235/2016

Bacha	Hussain Ex- Constable No.465, District Police, District Swat.
	(Appellant)
:	Versus
1.	The Regional Police Officer Malakand Region at Saidu Sharif Swat
2.	The District Police Officer, Swat
•	(Respondents)

<u>INDEX</u>

S.No	Description of Documents	Annexures	Page
1	Para-wise Comments		1-3
2	Affidavit		4
3	Authority Letter		5
4	Copy of 1 st page of Service book	"A"	6
5	Medical/Age Certificate	"B"	71

District Police Officer, Swat

(Respondent No.2)
District Police Officer,
Swat

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.



Service Appeal No.1235/2016

Bacha Hussain Ex- Constable No.465, District Police, District Swat.
(Appellant)
Versus
1. The Regional Police Officer Malakand Region at Saidu Sharif Swat
2. The District Police Officer, Swat
(Respondents)

Parawise comments on behalf of Respondents.

Respectfully shewith:

Preliminarily objection:-

- 1. That the service appeal is time barred.
- 2. That the service appeal is not maintainable.
- 3. That the appellant has concealed material facts from this August Tribunal.
- 4. That the service appeal is bad in the present form and liable to be dismissed.
- 5. That the appellant is estopped due to his own conduct.

ON FACTS

- Para No.1 relates to the service record of the appellant, therefore needs no comments.
- ii. Incorrect. The date of birth recorded in the service book of the appellant is 03/10/1951, whereas 1951 has been tampered as 1957. It is also pertinent to mention here that although digit 1 in 1951 has been tampered as 7, whereas date of birth recorded in words still appears nineteen hundred and fifty one. Furthermore, as per Medical certificate; the age of the appellant has also been settled as 03/10/1951 and he has been enrolled in Police department as per Medical certificate. Vide copies of 1st page of service book and Medical/age certificate as Annexures "A" and "B" respectively.
- iii. Incorrect. The fact of tampering had been concealed from authorities, whereas recently tempering in age was sorted out as date of birth recorded in digits(1951) was tampered (1957) but date of birth recorded in words in age field of the service book was still intact, therefore the appellant was retired from service w.e.f 02/10/2011.
- iv. As per Medical certificate issued on 03/10/1979, the age of the appellant was declared as 28 years, meaning thereby he was born on 03/10/1951 and as such he was enrolled as constable in Police department, hence he reached his

superannuation on 02/10/2011, therefore he was retired from service w.e.f 02/10/2011 i.e the date of his superannuation.



- v. Incorrect. The appellant connived to go with tampered date of birth and did not inform the authorities about his actual date of birth as per his Medical/age certificate. Had his date of birth not been tampered, he should have been retired from service on 02/11/2011, but later on it was revealed that his correct date of birth i.e 03/10/1951 has been tampered and illegally written as 1957, whereas date of Birth in words still remained intact as "Nineteen fifty one".
- vi. The appellant has been retired from service on reaching his superannuation i.e 02/10/2011 as per Medical certificate, therefore his departmental appeal being devoid of cogent reasons was filed.
- vii. The appellant has no good grounds to prefer the instant appeal.

ON GROUNDS

- a. Incorrect. 03/10/1951 has been recorded as date of birth in the service book of the appellant, whereas the same has been tampered and illegally written as 1957, however date of birth in words has still been intact, therefore, the appellant was retired from service w.e.f 02/10/2011 as he reached his superannuation on this very date. The appellant has been treated in accordance with Law and rules.
- b. Incorrect. The appellant is referring to a tampered date of birth i.e 03/10/1957, whereas according to Medical certificate his correct date of birth is 03/10/1951, and the appellant connived to go with a tampered date of birth.
- c. Incorrect. As per Medical/age certificate, the correct date of birth of the appellant is 03/10/1951 whereas the same has been tampered and illegally written as 1957, whereas date of birth recorded in words had still been intact, therefore the appellant was retired w.e.f 02/10/2011.
- d. Incorrect. The appellant connived to go with a tampered date of birth and illegally received salaries.
- e. Incorrect. The appellant was due to retire from service on 02/10/2011, but his date of birth in digits was tampered and he served in excess of 60 years age and condoned the tampered date of birth.
- f. Incorrect. PG No. 04/2013 has been issued in the year 2013; whereas the appellant was due to retire from service in the year 2011.
- g. Incorrect. The respondents have neither misused their authorities nor issued any illegal orders.

- (3)
- h. Incorrect. The respondents have exercised their vested authority in right course in accordance with Law and Rules.
- i. Incorrect. The appellant has not been deprived of his legal and legitimate right.

PRAYER:-

In view of the above comment on facts and grounds it is prayed that appeal of the appellant may be dismissed with cost.

Regional Police Officer, Malakand Region at Saidu Sharif, Swat (Respondents No.01)

District Police Officer, Swat (Respondents No.02) District Police Officer, Swat

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

(4)

Service Appeal No.1235/2016

Bach	a Hussain Ex- Constable No.465, District Police, District Swat.
	(Appellant)
	Versus
1.	The Regional Police Officer Malakand Region at Saidu Sharif Swat
2.	The District Police Officer, Swat
	(Respondents)

Affidavit

We, the above respondents do hereby solemnly affirm on oath and declare that the contents of the appeal are correct/true to the best of my knowledge/ behalf and nothing has been kept secret from the August Court.

Regional Police Officer Malakano Region at Saidu Sharif Swat (Respondents No.1)

District Police Officer, Swat

(Respondents No.2) District Police Officer, Swat

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.



Service Appeal No.1235/2016

Bacha	Hussain Ex- Constable No.465, District Police, District Swat.
	(Appellant)
	Versus
1.	The Regional Police Officer Malakand Region at Saidu Sharif Swat
2.	The District Police Officer, Swat
	(Respondents)

Authority Letter

We, the above respondents do hereby authorize Mr. Khawas Khan SI Legal Swat to appear in the Service Tribunal on our behalf on each date fixed in connection with titled Service Appeal and do whatever is needed.

Regional Police Officer Malakand Region at Saidu Sharif Swat (Respondents No.1)

District Police Officer, Swat

(Respondents No.2)
District Folice Officer,
Swat

ingsand colors.		Annexure 1		- 1/2 -	1/2
		- vision of carry		1/2	
	•	I	•		
Marketer and sei	rvice roll of	B		0 V	ang Fair ag e
			•	17.0	District.
THE TABULARY NO. () in) iu			11/1	District.
Dirito () in			2	District.
CONTRACTOR	1	1 1 0	Thermal with	7 18	
		ge or Town and Telegraph Office	3 1/2 4	196	
		i de la constant de l	1	201	inent inent larks
Name	Father's Name	Casto r.Town Telegra	no l	Birth	Dete of Encolment Age on Encolment Distinctive Maries
		Libe or caste Village or Tow Post and Teleg	District Province	oof 1	Date of Designation Distriction
	1	Tribo or Village Post and	District Province	Date	A S A
		1 1 1	1 kg		*3
				9	The state of the s
			M	3	
		A i	n C	1 / 1/2	
	3		A M	N. 12 H	
	la l		Mr. Bol		la I a
	1		3		4 6
	No.		R. J.	事等分	**
	18	Kin R	13 1	1 9	M M
3 .		AN .	3	nd	
		4	· · · · · · · · · · · · · · · · · · ·	<u> </u>	
Varification Roll No.	dated	received back a	and attached to th	e Fauji Misal.	
Verification Roll No.	dated	. (and attached to th		
		received back a			
	e prior to present emp	polyment, which is approv	ved for pension so	rviče.	PERIOD
	e prior to present emp	. (ved for pension so	rviče.	- Months Days
Government Servi	re prior to present emp	polyment, which is approv	ved for pension so	Years	
Government Servi	re prior to present emp	polyment, which is approv	t From	Years	- Months Days
Government Servi	re prior to present emp	polyment, which is approv	t From	Years	- Months Days
Government Servi	re prior to present emp	Pay of last Appointmen	t From To	Years	- Months Days
Covernment Serving Solvice of department	re prior to present emp	Pay of last Appointmen	t From To	Years	- Months Days
Covernment Service of department	re prior to present emp	Pay of last Appointmen	t From To	Years	- Months Days
Covernment Service Service or department Cause of and character on discharge from above service.	Rank or Grade	Pay of last Appointmen	Reference to above service in the	years Orders approving the for pension the Police Department.	- Months Days
Covernment Service Service or department Cause of and character on discharge from above service.	Rank or Grade	Pay of last Appointmen	Reference to above service in the	years Orders approving the for pension the Police Department.	- Months Days
Covernment Service Service or department Cause of and character on discharge from above service.	Rank or Grade	Pay of last Appointmen	Reference to above service in the	years Orders approving the for pension the Police Department.	- Months Days
Coverament Service of and character on discharge from above service. Agreement.—I unders the out the provisions of the law heen explained to me. I was a many of the law heen explained to me. I was a many of the law my Superior Office the received a conditionte of	Rank or Grade	Pay of last Appointmen	Reference to above service in the	years Orders approving the for pension the Police Department.	- Months Days
Covernment Service Service or department Cause of and character on discharge from above service.	Rank or Grade	Pay of last Appointmen	Reference to above service in the	years Orders approving the for pension the Police Department.	- Months Days
Coverament Service Service of department Cause of and character on discharge from above service. Agreement.—I unders defined the provisions of the law heen explained to me. I had by my Superior Office agreement a condition of the law my superior Office agreement a condition of the law my superior Office agreement as a condition of the l	Rank or Grade Rank or Grade Rank or Grade Act and of the Rules agree to cove feithfur s and undertake not fappointment issued to	appointed under section issued under it and now illy under the provisions to resign my appointments of the Pol	Reference to above service in the force, by white of the said Police and within the ice Act (V o; 186)	years Orders approving the for pension the Police Department.	- Months Days
Coverament Service Service of department Cause of and character on discharge from above service. Agreement.—I unders defined the provisions of the law heen explained to me. I had by my Superior Office agreement a condition of the law my superior Office agreement a condition of the law my superior Office agreement as a condition of the l	Rank or Grade Rank or Grade Rank or Grade Act and of the Rules agree to cove feithfur s and undertake not fappointment issued to	Pay of last Appointmen	Reference to above service in the force, by white of the said Police and within the ice Act (V o; 186)	years Orders approving the for pension the Police Department.	- Months Days
Coverament Service of and character on discharge from above service. Agreement.—I unders the out the provisions of the law them explained to me. I had by my Superior Office there received a condition of the law them explained to me. I had by my Superior Office there received a condition of the law them.	Rank or Grade Rank or Grade Rank or Grade Act and of the Rules agree to corve faithfurs and undertake not fappointment issued to	appointed under section issued under it and now illy under the provisions to resign my appointments of the Pol	Reference to above service in the force, by white of the said Police ent within the ice Act (V o; 186)	orders approving of or pension e Police Department.	- Months Days
Coverament Service Service of department Cause of and character on discharge from above service. Agreement.—I unders defined the provisions of the law heen explained to me. I had by my Superior Office agreement a condition of the law my superior Office agreement a condition of the law my superior Office agreement as a condition of the l	Rank or Grade Rank or Grade Rank or Grade Act and of the Rules agree to cove feithfur s and undertake not fappointment issued to	appointed under section issued under it and now illy under the provisions to resign my appointmender section 8 of the Polythumb of left has	Reference to above service in the force, by white of the said Police ent within the ice Act (V o; 186)	orders approving of or pension e Police Department.	Months Days If the purport of that so and conduct are governey all lawful orders issued date of my chrolment. Signals
Coverament Service of and character on discharge from above service. Agreement.—I unders the out the provisions of the law them explained to me. I had by my Superior Office there received a condition of the law them explained to me. I had by my Superior Office there received a condition of the law them.	Rank or Grade Rank or Grade Rank or Grade Act and of the Rules agree to corve faithfurs and undertake not fappointment issued to	appointed under section issued under it and now illy under the provisions to resign my appointmenter section 8 of the Polythumb of left has Left middle	Reference to above service in the from force, by white of the said Police and within the ice Act (V o; 1861)	orders approving so for pension he Police Department. It (V of 1861), and he my discipline for the discipline we years from the pension of t	Months Days If the purport of that so and conduct are governey all lawful orders issued date of my chrolment. Signals
Coverament Service of and character on discharge from above service. Agreement.—I unders the out the provisions of the law them explained to me. I had by my Superior Office there received a condition of the law them explained to me. I had by my Superior Office there received a condition of the law them.	Rank or Grade Rank or Grade Rank or Grade Act and of the Rules agree to corve faithfurs and undertake not fappointment issued to	appointed under section issued under it and now illy under the provisions to resign my appointmenter section 8 of the Polythumb of left has Left middle	Reference to above service in the from force, by white of the said Police and within the ice Act (V o; 1861)	orders approving of or pension e Police Department.	Months Days If the purport of that so and conduct are governey all lawful orders issued date of my chrolment. Signals
Coverament Service of and character on discharge from above service. Agreement.—I unders the out the provisions of the law them explained to me. I had by my Superior Office there received a condition of the law them explained to me. I had by my Superior Office there received a condition of the law them.	Rank or Grade Rank or Grade Rank or Grade Act and of the Rules agree to corve faithfurs and undertake not fappointment issued to	appointed under section issued under it and now illy under the provisions to resign my appointmenter section 8 of the Polythumb of left has Left middle	Reference to above service in the from force, by white of the said Police and within the ice Act (V o; 1861)	orders approving so for pension he Police Department. It (V of 1861), and he my discipline for the discipline we years from the pension of t	Months Days If the purport of that so and conduct are governey all lawful orders issued date of my chrolment. Signals
Coverament Service of and character on discharge from above service. Agreement.—I unders the out the provisions of the law them explained to me. I had by my Superior Office there received a condition of the law them explained to me. I had by my Superior Office there received a condition of the law them.	Rank or Grade Rank or Grade Rank or Grade Act and of the Rules agree to corve faithfurs and undertake not fappointment issued to	appointed under section issued under it and now illy under the provisions to resign my appointmenter section 8 of the Polythumb of left has Left middle	Reference to above service in the from force, by white of the said Police and within the ice Act (V o; 1861)	orders approving so for pension he Police Department. It (V of 1861), and he my discipline for the discipline was from the years from the discipline was so the so years from the discipline was so that and the sound that the sound	Months Days If the purport of that so and conduct are governey all lawful orders issued date of my chrolment. Signals

Anexer. "B



No. /83 | CASI

POLICE DEPTI

Dated Saidu Sharif, the 3/2/74 SVAT DISTT:

I do hereby contify that I have examina Balsah Musas o a condidate or employment in the Police Deptt: and cannot discover that he has an deaser constutional affication or bodily infirmaty except

My appearance about _

Dated 3.10 1979.

Ide declared that I have maker been pronounced unfit for Govt: employment by medical Borad on any their daly constituted medical matcherity.

re or thumb impression the condidate.

Octo 21



KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 2105 /ST Dated: 1519 /2017

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281 Fax:- 091-9213262

To,

The District Police Officer, Government of Khyber Paktunkhwa, Swat.

Subject: - <u>JUDGMENT IN APPEAL NO. 1235/2016, BACHA HUSSAIN.</u>

I am directed to forward herewith a certified copy of judgment dated 05/09/2017 passed by this tribunal on the above subject for strict compliance.

Encl: as above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR