


Form-A  
FORM OF ORDERSHEET

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

Case No. 244/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	27.05.2024	<p>As per verbal direction of the Hon'ble Member Judicial the present appeal is restored to its previous number and is fixed for preliminary hearing before touring Single Bench at A.Abad on 24.06.2024. Counsel for the appellant has been informed telephonically.</p> <p style="text-align: right;"> REGISTRAR</p>

Respected Madam,

It is submitted that the instant appeal bearing no. 244/2024 title Mazhar Rauf was returned by the Hon'ble Tribunal vide order dated 27.02.2024 being premature with permission to resubmit after maturity of cause of action. The learned counsel resubmitted the same on 10.05.2024 as it is now matured.

In this connection your Honour may apprise that whether the instant appeal be maintained on its previous number or otherwise.

  
REGISTRAR

HON'BLE MEMBER (J).

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

CM No. \_\_\_\_\_/2024

IN

Service Appeal No. 244-A/2024

Mazhar Rauf.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 12699

Dated 10-05-2024  
...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa & others.

...RESPONDENT

**SERVICE APPEAL**

APPLICATION FOR RE-FILING OF SERVICE  
APPEAL AFTER WHICH WAS RETURNED TO  
THE APPELLANT BEING FILED  
PREMATURE.

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Respectfully Sheweth;

1. That the titled appeal was filed by the present appellant before this Honourable Tribunal, which was returned to the appellant vide order dated 26/02/2024 due to the reason that the appeal was filed premature by the appellant. Copy of order dated 26/02/2024 is annexed as Annexure "A".

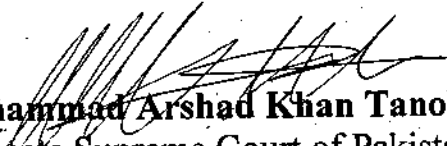
2. That now the appeal of the appellant has become mature and is being filed before this Honourable Tribunal.
3. That valuable rights of the appellant are involved.

It is therefore humbly prayed that the appeal of the appellant may please be admitted for regular hearing.

  
...APPELLANT

Through

Dated: \_\_\_\_\_/2024

  
(Muhammad Arshad Khan Tanoli)  
Advocate Supreme Court of Pakistan  
At Abbottabad

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

CM No. \_\_\_\_\_/2024

IN

Service Appeal No. 244-A/2024

Mazhar Rauf

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa & others.

...RESPONDENT

**SERVICE APPEAL**

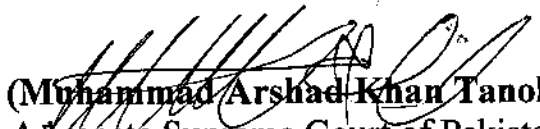
**INDEX**

S. No.	Description	Page Nos.	Annexure
1.	Application	1 to 2	
2.	Copy of order dated 26/02/2024	1, 3	A

  
...APPELLANT

Through

Dated: \_\_\_\_\_/2024

  
(Muhammad Arshad Khan Tanoli)  
Advocate Supreme Court of Pakistan  
At Abbottabad

Annex - A P-3

Service Appeal No.244/2024 titled "Mazhar Rauf Vs. Government of Khyber Pakhtunkhwa"

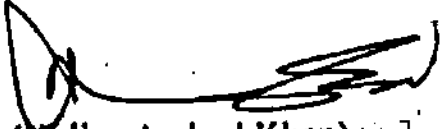
**ORDER**

27<sup>th</sup> Feb. 2024 Kalim Arshad Khan, Chairman, Learned counsel for the appellant present.

2. Learned counsel for the appellant submits that this appeal as prematurely filed. He requests that it might be returned to him for its resubmission after its maturity. Order accordingly.

3. Original memo and grounds of appeal as well as annexures be returned to the learned counsel for appellant while order sheets and copies of the documents and original wakalat nama are retained on this file and it be consigned. The concerned dealing clerks of the Institution Branch shall explain as to why premature appeals are being received by them. Consign.

4. *Pronounced in open Court at Abbottabad under my hand and seal of the Tribunal on this 27<sup>th</sup> day of February, 2024.*

  
(Kalim Arshad Khan)  
Chairman  
Camp Court, Abbottabad

SCANNED  
BEST



KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

Mazhar Razi

Versus

Govt of K.P.

..... Appellant

..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Ashtak Advocate Sindh Court AD</u>	✓	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3.	Whether appeal is within time?	✓	
4.	Whether the enactment under which the appeal is filed mentioned?	✓	
5.	Whether the enactment under which the appeal is filed is correct?	✓	
6.	Whether affidavit is appended?	✓	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8.	Whether appeal/annexures are properly pagged?	✓	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10.	Whether annexures are legible?	✓	
11.	Whether annexures are attested?	✓	
12.	Whether copies of annexures are readable/clear?		
13.	Whether copy of appeal is delivered to AG/DAG?	✓	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15.	Whether numbers of referred cases given are correct?	✓	
16.	Whether appeal contains cutting/overwriting?	✓	
17.	Whether list of books has been provided at the end of the appeal?	✓	
18.	Whether case relate to this court?	✓	
19.	Whether requisite number of spare copies attached?	✓	
20.	Whether complete spare copy is filed in separate file cover?	✓	
21.	Whether addresses of parties given are complete?	✓	
22.	Whether index filed?	✓	
23.	Whether index is correct?	✓	
24.	Whether Security and Process Fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled

Name:- Mazhar Razi

Signature:- [Signature]

Dated:- 09/01/2024



**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. 244/2024

Mazhar Rauf S.I No.43/H, Police Line Abbottabad.

...APPELLANT Peshawar

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Interior and Tribunal Affairs,  
Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

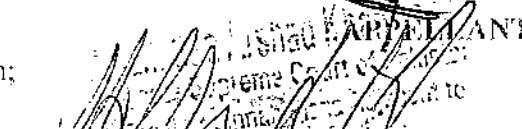
**SERVICE APPEAL**

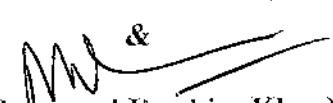
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2.	Copy of impugned punishment of forfeiture of 02 years of regular service of the appellant	13	"A"
3.	Copy of application	14	"B"
4.	Copy of handing over of charge report, relevant documents, and complaint of Moosa Khan	15-20	"C"
5.	Copy of letter wherein inquiry against the appellant has been ordered by respondent No.4	23-27	"D"
6.	Copy of show cause notice regarding delay of one month and 20 days in lodging of FIR.	28-29	"E"
7.	Copy of reply	30-31	"F"
8.	Copies of service appeal No.1122-A/2018 and judgment dated 24/10/2023 of this Honourable Tribunal	32-35	"G"
9.	Copy of show cause notice/ statement of allegation dated 08/11/2023	46-47	"H"
10.	Copy of reply of show cause notice submitted by appellant	48	"I"
11.	Copy of impugned order OB No.302 dated 21/12/2023	49-50	"J"
12.	Wakalatnama		

Dated: \_\_\_\_\_/2024

Through;

  
(Muhammad Arshad Khan Farooqi)  
Advocate Supreme Court of Pakistan  
at Abbottabad

  
(Muhammad Ibrahim Khan)  
Advocate High Court, Abbottabad

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE**  
**TRIBUNAL, PESHAWAR**

Service Appeal No. 244 2024

**Khyber Pakhtunkhwa**  
**Service Tribunal**

Diary No. 10495

Dated 10-1-2024

Mazhar Rauf S.I No.43/H, Police Line Abbottabad.

**....APPELLANT**

**V E R S U S**

1. Government of Khyber Pakhtunkhwa through Secretary Interior and Tribunal Affairs, Khyber Pakhtunkhwa, Peshawar.
2. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
3. Regional Police Officer, Hazara Range, Abbottabad.
4. District Police Officer, Abbottabad.

**...RESPONDENTS**

**SERVICE APPEAL** UNDER SECTION 4 OF  
KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT 1974 FOR DECLARATION  
TO THE EFFECT THAT HONOURABLE  
TRIBUNAL HAS CONVERTED THE SERVICE  
APPEAL OF THE APPELLANT INTO  
DEPARTMENTAL APPEAL AND DIRECTED  
THE RESPONDENTS' DEPARTMENT THAT  
TEMPERING/OVER WRITING IN REGISTER  
NO.5-A WAS MADE BY THE APPELLANT OR  
SOME ONE ELSE BUT AGAIN RESPONDENT

  
Registrar 10/01/24

Re-submitted to -day  
and filed.

  
Registrar  
1/2/24

NO.3 AWARDED PENALTY OF FORFEITURE OF 02 YEARS REGULAR SERVICE VIDE ORDER OB NO.302 DATED 21/12/2023 BUT SAID LETTER IS UNSIGNED AS A RESULT THE APPELLANT FILED APPEAL BEFORE RESPONDENT NO.2 UNDER R.T.I ACT 2013 FOR PROVISION OF ATTESTED COPY OF IMPUGNED ORDER OB NO.302, DATED 21/12/2023 BUT THE APPLICATION OF THE APPELLANT WAS FILED AND HE WAS VERBALLY TOLD BY RESPONDENT NO.3, THAT ATTESTED COPY OF THE IMPUGNED OB NO.302, DATED 21/12/2023 COULD NOT BE PROVIDED. THE SAID ACT OF RESPONDENT IS ILLEGAL, PERVERSE, AND DISCRIMINATORY

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**PRAYER:** ON ACCEPTANCE OF INSTANT SERVICE APPEAL THE IMPUGNED OB NO.302, DATED 21/12/2023 MAY GRACIOUSLY BE ORDERED TO BE SET-ASIDE AND 02 YEARS FORFEITURE OF REGULAR SERVICE is to BE ORDERED TO BE RESTORED WITH SENIORITY AND DIFFERENCE OF PAY AND ALLOWANCES

TO THE APPELLANT. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL MAY DEEM APPROPRIATE MAY BE GRANTED TO THE APPELLANT.

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Respectfully Sheweth;-

The facts forming the background of the instant service appeal are arrayed as under;

1. That the respondents' department forfeited 02 years service of the appellant on flimsy unfounded, baseless allegation of not lodging the FIR within prescribed period vide OB No.302 dated 21/12/2023. Copy of impugned punishment of forfeiture of 02 years of regular service of the appellant is annexed as Annexure "A".
2. That one Moosa Khan son of Sultan, resident of Banda Sahib Khan, Havelian filed a complaint for lodging of FIR under Section 380 PPC on dated 16/08/2016 which was received by the appellant through proper channel on

18/08/2016. However, in the meanwhile, the appellant was transferred from Police Station Havelian to Police Line Abbottabad on 19/08/2016. Copy of complaint of Moosa Khan 16/08/2016 received in the DPO is attached as Annexure "A". The application as per remarks, received by the appellant on 18/08/2018.

3. That as mentioned above, the appellant was transferred from Police Station Havelian to Police Line Abbottabad vide order No.192 dated 19/08/2016. It is further submitted that the appellant received the message of transfer from Police Station Havelian to Police Line via telephonic message. The appellant submitted an application under Right to Information Act 2013 for provision of proper transfer order dated 19/08/2016. But, respondent No.4 did not provide the same so. Copy of application is annexed as Annexure "B".

4. That, following this, the appellant handed over the charge to Moharar Police Station Havelian alongwith all documents as well as subject complaint of Moosa Khan 20/08/2016. Copy of

handing over of charge report, relevant documents, and complaint of Moosa Khan is annexed as Annexure "C".

5. That respondent No.4 marked an inquiry previously wherein, delay of 01 month and 20 days in lodging of FIR on the complaint of Moosa Khan dated 16/08/2016 has been attributed to the appellant which is against the law and without lawful justification. Copy of letter wherein inquiry against the appellant has been ordered by respondent No.4 is annexed as Annexure "D".
6. That, respondent No.4 served show cause notice upon the appellant regarding delay of one month and 20 days in lodging of FIR on the complaint of the complainant Moosa Khan which is annexed as Annexure "E".
7. That the appellant properly replied to the show cause notice on 30/12/2016. Copy of reply is annexed as Annexure "F".

8. That the appellant from the very beginning submitted applications as well as replies to the show cause notice that the complainant received the complaint on 18/08/2016 from the DPO Office and therefore, he was transferred from Police Station Havelian to Police Line Abbottabad on 19/08/2016. Resultantly, the appellant handed over the charge of post including all the documents and complaints on 20/08/2016. Therefore, question of delay of 01 month and 20 days in lodging of FIR on the complaint of Moosa Khan does not arise but even then, the two years of regular service was forfeited vide order OB No.42 dated 21/02/2017 which was impugned before the Honourable Tribunal for setting-aside the said order.

9. That the service Appeal No.1122-A/2018 of the appellant was argued and finally this Honourable Tribunal transmitted it to the respondents' department to the conduct inquiry as to whether the appellant or any other person is involved in tempering register No.5-A of Police Station Havelian. Copies of service

appeal No.1122-A/2018 and judgment dated 24/10/2023 of this Honourable Tribunal are annexed as Annexure "G".

10. That as a result respondent No. 4 once again issue show cause notice/statement of allegation on 08/11/2023. Copy of show cause notice/statement of allegation dated 08/11/2023 is attached as Annexure "H".

11. that the appellant properly replied to the show cause notice/charge sheet. Copy of reply of show cause notice submitted by appellant is attached as Annexure "I".

12. That following this respondent No.3 again imposed penalty of forfeiture of 02 years regular service of the appellant vide OB No.302 dated 21/12/2023 which is not signed by neither respondent No. 4 or any other officer. Copy of impugned order OB No.302 dated 21/12/2023 is annexed as Annexure "J".

13. That the appellant feeling aggrieved file application under KP RTI Act 2013 regarding



provision of attested. Copy of impugned order OB No.302 dated 21/12/2023, but the application of the appellant was filed and the appellant was told by P.A to respondent No. 4 that your application has been filed and nor attested copy will not be provided to you. Copy of application under KP RTI Act 2013 is annexed as Annexure "I". Hence, the instant service appeal is filed inter-alia, on the following grounds;-

**GROUND:-**

- a. That the impugned order dated 21/12/2023 is perverse, discriminatory, without lawful justification, against the facts and the same is liable to be set-aside.
- b. That the appellant has been made a scapegoat due to no fault of his as the appellant retained the complaint of Moosa Khan only for one day and on the next day, the appellant was transferred from Police Station on 18/08/2016. Therefore, the delay

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of one month and 20 days cannot be attributed to the appellant. Therefore, one day delay has been stretched to one month and 20 days by the inquiry officer at his own sweet will just to spoil service career of the appellant.

c. That the employees of the police department are to serve 24 hours like that of employee of Defense Forces. Therefore, all the ins and outs of movement as well as records is maintained in the relevant registers. The respondent No.4 while awarding punishment of 02 years of forfeiture of service of the appellant did not bother to look into the reply to the show cause notice as well as the relevant record available in the Police Station Havelian. Therefore, forfeiture of 02 years of service is liable to be set-aside.

d. That the appellant is innocent, law abiding police officer and cannot think of committing miscarriage of justice. The appellant served the department diligently and left no stone unturned in the smooth

functioning of the department. Therefore, the appellant cannot be penalized due to non-reading and mis-reading of the official record which reveals that the appellant received the complaint of Moosa Khan on 19/08/2016. Hence, the appellant has been punished just for nothing and due to the fault of his, ASI Chenzeb.

e. That, the forfeiture of service comes within the meaning of terms and condition of service. Therefore, service tribunal has got jurisdiction to entertain and adjudicate upon the service appeal of the appellant.

f. That the matter relates to terms and condition of service, therefore, this Honourable Tribunal has jurisdiction to entertain the instant service appeal under Article 212 of the constitution. Besides appeal of the appellant is well within time.


It is therefore, very humbly prayed, that on acceptance of instant service appeal the impugned OB No.302, dated 21/12/2023 may graciously be

ordered to be set-aside and 02 years forfeiture of regular service is to be ordered to be restored with seniority and difference of pay and allowances to the appellant. Any other relief which this Honourable tribunal may deem appropriate may be granted to the appellant.

  
..APPELLANT

Through;

Dated; \_\_\_\_\_/2024

  
(Muhammad Arshad Khan Tanoli)  
Advocate Supreme Court of Pakistan  
at Abbottabad

  
&  
(Muhammad Ibrahim Khan)  
Advocate High Court, Abbottabad

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_ 2024

Mazhar Rauf S.I No.43/H, Police Line Abbottabad.

....APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa through Secretary Interior and Tribunal  
Affairs, Khyber Pakhtunkhwa, Peshawar & others.

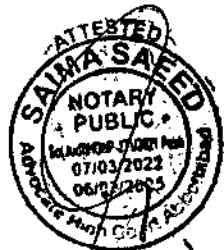
...RESPONDENTS

**SERVICE APPEAL**

**AFFIDAVIT**

I, *Mazhar Rauf S.I No.43/H, Police Line Abbottabad*, do hereby solemnly  
affirm and declare that the contents of foregoing appeal are true and correct  
to the best of my knowledge and belief and nothing has been concealed  
therein from this Honourable Court.

~~DEPONENT~~



08/01/24

Annex - A

OB - 302

DPO ATD

ORDER

P-13

21/12/23

This office order will dispose-off the De-novo departmental enquiry against SI Mazhar-Rauf No. 43/H. In compliance with the judgment of Honorable Service Tribunal, Camp Court Abbottabad in appeal No. 1122/2018 titled Mazhar Rauf Versus Government of Khyber Pakhtunkhwa and others for conducting de-novo departmental enquiry against him on the allegations that a letter vide No. 815/C-Cell, dated 23-11-2016 received from worthy Regional Police Office, which was marked to DSP, Investigation, Abbottabad for preliminary enquiry. According to the report of DSP, Investigation, application of Musa Khan S/O Sultan, R/O Banda Sahib Khan, Havelian plaintiff/complainant of case FIR No. 625, dated 18-09-2016, U/S 380 PPC, Police Station Havelian was marked to him but he willfully failed to register FIR in time despite of having clear information about accused which showed his lack of interest and brought bad name for Police department.

He was issued with Charge Sheet along with statement of allegations vide No. 294/PA dated 08-11-2023 and SP Cantt Abbottabad was appointed as Enquiry Officer to scrutinize the conduct of delinquent official. Enquiry Officer conducted de-novo departmental enquiry against the delinquent official and recorded statements of all concerned. After conducting de-novo departmental enquiry, the Enquiry Officer submitted his findings wherein allegations stands established against delinquent official. He was issued with Final Show Cause Notice vide No. 313/PA dated 07-12-2023. He was given ample opportunity of hearing but he had nothing plausible to state in his defense.

Therefore, in exercise of the powers vested in the undersigned Police Disciplinary Rules-1975 (Amended 2012), I, being District Police Officer, Abbottabad, as a competent authority, agreed with the punishment awarded to the delinquent official earlier which commensurate with his guilt hence, the punishment awarded vide this office OB No. 42 dated 21-02-2017 remain intact.

*Allesha*

*Muhammad*



Amey - C - P-15

*Handwritten signature*

<p>1907 239 22 1910 DSP 12316</p>	<p>17 16</p>	<p>Handwritten notes in Urdu/Arabic script, including "1907" and "239 22".</p>	<p>848 137</p>	<p>Handwritten notes in Urdu/Arabic script, including "1907" and "239 22".</p>
<p>1907 239 22 1910 DSP 12316</p>	<p>17 16</p>	<p>Handwritten notes in Urdu/Arabic script, including "1907" and "239 22".</p>	<p>848 137</p>	<p>Handwritten notes in Urdu/Arabic script, including "1907" and "239 22".</p>
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<p>1907 239 22 1910 DSP 12316</p>	<p>17 16</p>	<p>Handwritten notes in Urdu/Arabic script, including "1907" and "239 22".</p>	<p>848 137</p>	<p>Handwritten notes in Urdu/Arabic script, including "1907" and "239 22".</p>



Rec'd

*McGraw*

90/8/2016  
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Rec'd  
Mc 279 f - 589 cut 16

(1)	525 SA	(1)	16 8 1/2
(2)	662-SAA UAT	(2)	16 8 1/2
(3)	789-SA UAT	(3)	16 8 1/2
(1)	504-SA UAT	(1)	16 8 1/2
(1)	662-SA UAT	(1)	16 8 1/2
(1)	808-SA UAT	(1)	16 8 1/2
(2)	795-SA UAT	(2)	16 8 1/2
(1)	834-SA UAT	(1)	16 8 1/2
(1)	850-SA UAT	(1)	16 8 1/2
(2)	Peplm	(2)	16 8 1/2
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عزیز دوست

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(11)

صالح ایف آئی

تفصیلی رپورٹ 36 روزانہ 11/08/08

36

رپورٹ مکمل و ناف جان

11/08/08 وقف 20:20 بجے

رپورٹ مکمل و ناف جان

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پہلے کہا گیا مافی ڈائن سے سابقہ ایک نقل رپورٹ 14 روزانہ 13/08/08

رپورٹ مکمل و ناف جان 20:20 بجے 11/08/08

رپورٹ مکمل و ناف جان 20:20 بجے 11/08/08

مناف جان

Attest

Public Notary  
Sole Government  
Notary Public  
District of Columbia

تفصیلی رپورٹ

Signature

MHC - PS - 1470  
19-02-2017



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378/111  
34000

850-11  
B. M. N.

بسم الله الرحمن الرحيم

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نظر سے مراد 56 اور 18

موسم

P-21

بسم الله الرحمن الرحيم

نظر سے مراد 18 اور 56  
موسم اور 18 اور 56

موسم

بسم الله الرحمن الرحيم

19-02-2017

Abbas

Abbas

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P-22

**ORDER**

Following transfer/posting amongst the Upper-Subordinates are hereby ordered with immediate effect.

S. No.	Name /Rank	From	To
1.	SI Aurangzeb No. 125/H	Police Lines	ASHO PS Nawansher
2.	SI Chanzeb No. 58/H	Police Lines	I/C POF Havelian
3.	ASI Niaz No. 546	Police Lines	PS Havelian
4.	ASI Mazahar Rauf No. 1039	PS Havelian	Closed to Police Lines
5.	ASI Nazak Mehmood No. 921	I/C POF Havelian	Closed to Police Lines
6.	ASI Shaheen Akbar No. 498	Traffic Staff	Closed to Police Lines

*[Handwritten signature]*  
 District Police Officer, Abbottabad

*[Handwritten signature]*  
 District Police Officer, Abbottabad

No. \_\_\_\_\_ /SRC Dated Abbottabad the \_\_\_\_\_ / \_\_\_\_\_ /2016.

Copy of above is submitted to the Regional Police Officer, Hazara Region, Abbottabad for favour of information please.

*[Handwritten signature]*  
 District Police Officer, Abbottabad

003 - 110 - 192

19 - 8 - 16

13



Phone: 0992-9310046  
Fax: 0992-9310047

Annex-D P-23

Office of the Superintendent of Police, Investigation Abbottabad.

No: 89 PA/Inv: dated Abbottabad the, 10 / 02 / 2017

To: The District Police Officer,  
Abbottabad

Subject: DEPARTMENTAL ENQUIRY AGAINST ASI MAZHAR RAUF, THE THAN POLICE STATION HAVELIAN.

Memo:

Kindly refer to your good office Endst No: 24/PA dated 10-01-2017, No: 350/PA dated 20-01-2017 and Memo No: 641 /PA dated 07-02-2017 on the subject cited above.

Enclosed kindly find herewith a departmental enquiry report in respect of ASI Mazhar Rauf of Police Station, Havelian (presently serving in Elites Force Hazara, for favour of kind perusal please.

*[Handwritten signature]*  
Superintendent of Police,  
Investigation, Abbottabad.

Superintendent of Police,  
Investigation, Abbottabad.

*For Feitur of  
2 years of service*

Attested  
*[Handwritten signature]*

OB - NO - 42  
21 - 2 - 17

OFFICE OF THE SUPERINTENDENT OF POLICE,  
INVESTIGATION,  
KHYBER PAKHTUNKHWA  
16/3/17

14

**DEPARTMENTAL ENQUIRY AGAINST ASI MAZHAR RAUF,  
PRESENTLY SERVING IN ELITES FORCE, HAZARA, ABBOTTABAD.**

**ALLEGATIONS:-**

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An application of Musa Khan S/O Sultan, R/O Banda Sahib Khan, Havelian plaintiff/complainant of case FIR No: 625, dated 18-09-2016, U/S 380 PPC, Police Station Havelian was marked to him for necessary action under the law which was kept pending by the accused official and he did not take any action on the application. After the laps of 01 Month and 20 days case was registered.

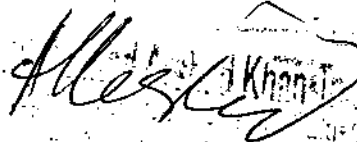
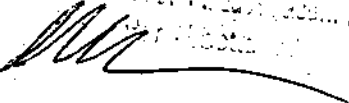
Initially the allegations were probed in by the Deputy Superintendent of Police, Investigation headquarters Abbottabad which was sent by the District police officer, Abbottabad vide his office Endst No: 883/H-C dated 25-11-2016. The enquiry Officer submitted his finding in which he held ASI Mazhar Rauf responsible for deliberate delay in registration of the case in time on the application of Musa Khan S/O Sultan Khan. A proper departmental enquiry is initiated by Worthy District Police officer, Abbottabad vide his office Endst No: 25/PA dated 10-01-2017 and undersigned was appointed as enquiry officer.

**PROCEEDINGS:-**

On receipt of enquiry papers the enquiry was initiated and during the course of enquiry the following persons were called upon, heard and recorded their statements as per rules. The opportunity of cross examination was also extended to the defaulter officer.

**1. STATEMENT OF IHC ZANFAR KHAN PS HAVELIAN:-**

While he was posted as HC in Police Station Havelian, initially the application of Musa Khan was marked to him while he requested to SHO that the same may be marked to beat officer ASI Mazhar Rauf as it relates to matter of theft and the same was marked for necessary action to ASI Mazhar Rauf. He also admitted the fact that alteration /addition was made in register 5-A /5-AA by ASI Mazhar Rauf.



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2. STATEMENT OF MHC WASEEM IOBAL PRESENTLY POLICE LINES:-

He stated that at the instant time HC Ishfaq was posted as MHC Havelian. The same application of Musa Khan was marked in his time to ASI Jahanzeb on 18-09-2016 upon which instant case vide FIR No: 625 dated 18-09-2016 u/s 380 PPC PS Havelian was registered.

3. STATEMENT OF ASI MUHAMMAD ISHFAQ PRESENTLY PS SHERWAN:-

He stated that an application of Musa Khan was receipt regarding theft of 85000/-. The same application was marked by the SHO to ASI Mazhar Rauf for necessary legal action. Later on he was transferred on promotion to PS Sherwan.

4. STATEMENT OF ASI TANVEER PS HAVELIAN:-

On receipt of FIR after registration of the case FIR No: 625 dated 18-09-2016 u/s 380 PPC PS Havelian. He investigated the case and tried his best to arrest the accused. Later on he submitted challan under section 512 Cr.P.C in the competent court of law.

5. STATEMENT OF ASI JAVED PRESENTLY PS KHAKI MANSEHRA:-

While posted at PS Cantt he investigated the case vide FIR No: 818 dated 01-08-2016 u/s 379/34/411 PS Cantt. He arrested the 04 accused in the case and recovered the stolen amount 16000/- from their possession. Later on the arrested accused was remanded judicially and complete challan was submitted in the case.

6. STATEMENT OF ASI JAHANZEB OF PS HAVELIAN:-

He while posted at PS Havelian received an application of Musa Khan marked by SHO Havelian on 18-09-2016. After initial enquiry a case vide FIR No: 625 dated 18-09-2016 u/s 380 PPC PS Havelian was registered. Furthermore, the entries made in register 5-A /5-AA in which an application of Musa Khan was marked to him 01 Month prior to his posting in Police Station for which MHC concerned can better explain.

7. STATEMENT OF ABDUR RASHID S/O SUMANDER KHAN R/O DEWAL ABBOTTABAD:-

He stated that on 01-08-2016 he was present in Fowara Chowk waiting for vehicle. A carry van came and stopped there and offered him to set in vehicle. He boarded into the vehicle where 04 ladies passenger set over there. On the way he was gotten off from the vehicle as 01 lady started vomiting. When he got off from the vehicle he checked his pocket and found his amount Rs. 16000/- missing. He reported this fact in PS Cantt and 04 ladies were arrested and his amount Rs. 16000/- was recovered.

*(Signature)*  
P-25

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8. STATEMENT OF LADY CONSTABLE RAZIA NO: 112.

She stated that complainant of the case vide FIR No: 813 which was registered in PS Cantt name y Abdur Rashid effected compromise and insisted her to produce a surety in bail of accused. Upon this her son yasir Khan furnished surety in bail bond and nothing more she knew about the accused.

9. STATEMENT OF MUSA KHAN S/O SULTAN KHAN R/O BANDA SAHIB KHAN HAVELIAN.

He stated that after the commission of offence on 28-07-2016 he submitted an application of theft of Rs 85000/- for registration of case in PS Havelian. He also charged the accused who were later on arrested by PS Cantt. He also informed PS Havelian time and again for the arrest but in vain. ASI Mazhar Rauf did not take any action upon his written application and also tried to officer him that out of 85000/- stolen amount he will share Rs. 35000/- to him and remaining amount 50000/- will be given. He also told that he is in contact with the accused which are arrested by cantt police. Later on he released on bail. Again on 06-08-2016 he submitted an application which was also marked to ASI Mazhar Rauf who replied that he has been transferred and no action was taken. Finally he again submitted an application on which instant case was registered but the accused who are arrested in other case of PS Cantt were released on bail and no one was arrested in his case.

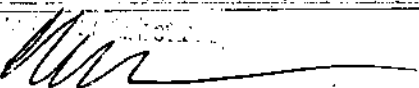
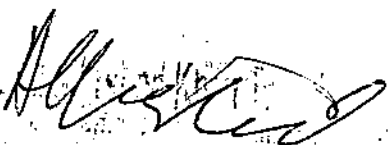
10. STATEMENT OF ASI MAZHAR RAUF PRESENTLY SERVING IN ELITES FORCE, HAZARA, ABBOTTABAD.

He stated that on 17-08-2016 an application of Musa Khan was marked to him but he was transferred to Police Lines Abbottabad and relinquished the charge on the same day he denied the receipt of other application marked against him in Police Station record. He also declared doubtful the entries made in register 5-A dated 06-08-2016 and 28-07-2016 as there was alteration /addition was found. He denied to have committed an illegal act also denied the version of complainant Musa Khan.

**CONCLUSION:-**

Keeping in view the above discussion in the light of facts and figures, the undersigned is of the view that:-

1. Initially a preliminary enquiry was conducted by Deputy Superintendent of Police Investigation, Headquarters which was perused and recommended for departmental action.




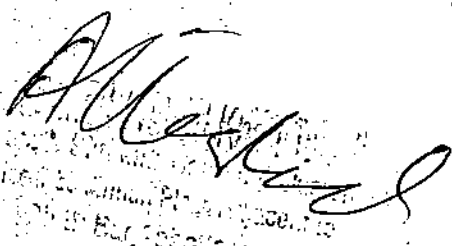
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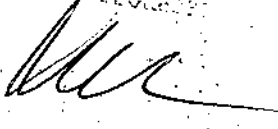
2. It has been established that the written application of MUSA KHAN marked to accused official ASI Mazhar Rauf who utilized delay tactics and did not take any action on his application.
3. A condition has been found in register 5-A for which the concerned field responsible ASI Mazhar Rauf for cutting while on the other side accused official was going to rebut the same. Anyhow, the then applicant / complainant of the case vide FIR No: 625 dated 18-01-2016 u/s 380 PPC PS Havelian proves that initially the same application was marked to ASI Mazhar Rauf. Rather going into taking legal action on his report, he tried to bargain with him.
4. Due to un-necessary delay of 01 Month and 20 days the instant case was registered on SMS online FIR.

P-27

During inquiry deliberate slackness has been found for which he is accounted for. Therefore, he is recommended for suitable punishment. Submitted please.

  
 (SAJID KHAN)  
 Superintendent of Police,  
 Investigation, Abbottabad.

  
 Superintendent of Police,  
 Investigation, Abbottabad.



OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD

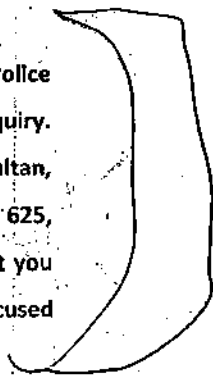
No. 94/PA, Dated Abbottabad, the 17/11/2017.

GROUPS OF ACTION

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That you ASI Mazhar Raheef the than Police Station Havelian, committed following misconduct:-

- I. A letter vide No. 815/C-Cell, dated 23-11-2016 received from worthy Regional Police Office, which was marked to DSP, Investigation, Abbottabad for preliminary enquiry. According to the report of DSP, Investigation application of Musa Khan S/O Sultan, R/O Banda Sahib Khan, Havelian plaintiff/complainant of case FIR No. 625, dated 18-09-2016, U/S 380 PPC, Police Station Havelian was marked to you but you willfully failed to register FIR in time inspite of having clear information about accused which shows your lack of interest and brought bad name for Police department.
- II. During proper departmental enquiry the allegations have been proved against you. By reasons of above you have rendered yourself liable to be proceeded under Khyber Pakhtunkhwa Police Rules, 1975, hence these grounds of action.



District Police Officer, Abbottabad.

Attested

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Attested

Muhammad Anshad Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
Distt Bar Abbottabad

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**OFFICE OF THE DISTRICT POLICE OFFICER, ABBOTTABAD**

No: 94/PA, Dated Abbottabad, the 17/02/2017.

**FINAL SHOW CAUSE NOTICE**

(Unit Rule (3) KPK Police Rules, 1975)

Annex- E

1. That you ASI Mazhar Rafoof the than Police Station Havelian, rendered yourself liable to be proceeded under Rule 5 (3) of the Khyber Pakhtunkhwa Police Rules 1975 for following misconduct;

I. A letter vide No. 815/C-Cell, dated 23-11-2016 received from worthy Regional Police Office, which was marked to DSP, Investigation, Abbottabad for preliminary enquiry. According to the report of DSP, Investigation application of Musa Khan S/O Sultan, R/O Banda Sahib Khan, Havelian plaintiff/complainant of case FIR No. 625, dated 18-09-2016, U/S 380 PPC, Police Station Havelian was marked to you but you willfully failed to register FIR in time inspite of having clear information about accused which shows your lack of interest and brought bad name for Police department.

II. During proper departmental enquiry the allegations have been proved against you.

2. That by reason of above, as sufficient material is placed before the undersigned therefore it is decided to proceed against you in general Police proceeding without aid of enquiry officer;
3. That the misconduct on your part is prejudicial to good order of discipline in the Police force.
4. That your retention in the police force will amount to encourage in efficient and unbecoming of good Police officers;
5. That by taking cognizance of the matter under enquiry, the undersigned as competent authority under the said rules; proposes stern action against you by awarding one or more of the kind punishments as provided in the rules.
6. You are, therefore, called upon to Final Show Cause as to why you should not be dealt strictly in accordance with the Khyber Pakhtunkhwa Police Rules, 1975 for the misconduct referred to above.
7. You should submit reply to this Final Show Cause Notice within 07 days of the receipt of the notice failing which an ex parte action shall be taken against you.
8. You are further directed to inform the undersigned that you wish to be heard in person or not.
9. Grounds of action are also enclosed with this notice.

P-12

Alister  
[Signature]

District Police Officer, Abbottabad.

Received by \_\_\_\_\_

Dated \_\_\_/\_\_\_/2017.

[Handwritten signatures and notes]

91  
[Signature]  
Advocate High Court  
Office No 33 Adjacent to  
Jail Bar Abbottabad

FIR NO  
20-02-2017

Annex-F

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**BEFORE THE DISTRICT POLICE**  
**OFFICER ABBOTTABAD**

Annex-F

Subject: Reply to Show Cause Notice No 8666/1330, / PA  
Dated 19.12.2016

Respected Sir,

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The Petitioner begs to submit the following.

- 1). That the allegation leveled against the petitioner in clause (I) are base are not in facts as the inquiry conducting by Tanveer ASI Havellian. Investigation under FIR No 625 dated 18.09.2016 U/S 380 PPC PS Havellian therefore he better explain the exact position in this regard.
- 2). That, the petitioner has been served with a show cause notice setting therein an application was submitted by one Musa Khan which was marked to the petitioner by DSP Circle Havellian, but no legal action was taken despite clear information about the accused and hence the show cause notice was issued.
- 3). That, infact the real facts forming the background of the instant allegation are as follows:-
  - a). That, on 28.07.2016 an application was addressed to SHO by Musa Khan son of Sultan Khan and there is an entry in this respect in the concerned register 5AA in the said application unknown persons were charged, but to the misfortune there is a cutting /overwriting and interpolation and subsequently the name of petitioner has been written/mentioned, it does not stand to reason as why name of Khan Afsar IHC and another name were cut and thereafter the name of petitioner was added/written on 06.08.2016, there is an other entry in the above mentioned register with respect to the

*Attested*  
Mohammad Arshad Khan Jang  
Advocate High Court  
Office No: 33 Adjacent to  
Distt. Jail Abbottabad

*Attested*  
Mohammad Arshad Khan Jang  
Advocate High Court of Pakistan  
Office No: 33 Adjacent to  
Distt. Jail Abbottabad

*Wk*

P-31

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subsequently the name of petitioner was added which is quite visible on the concerned register.

b). That, on 16.08.2016 as another application was addressed to DPO Abbottabad bearing No. 850-5A, PS Havellian which was marked to the petitioner on 18.08.2016, the petitioner was transferred on 20.08.2016 police line Abbottabad and while handing over charge the petitioner has specifically mentioned at serial No. 9 showing therein the application No 850-5A which was handed over to the Muharrir of PS on 20.08.2016.

c). That, for reason best known another application has been addressed to the DSP dated 16.09.2016 which led to the registration of the case. There is no any indication as to why no proceeding were taken and another application which was handed over to the Muharrir of PS and what was the need of another application on 16.09.2016, or begging questions to the routes of the case. Moreover one Yasir Arafat stood as surety for accused Muqaddas wife of Abdullah and the said Yasir Arafat is the son of lady constable namely Razia Bibi, all these facts would show the after deliberation and consultation every effort was made to hang the petitioner.

(all the documents annexed with the reply)

In the light of above discourse, it is most humbly prayed that the petitioner may kindly be absorbed from the charges leveled against him.

Dated 30.09.2016



Mazhar Rauf

ASI, PS Saddar Mansehra

Attested  
Muhammad Asghar Khan Farid  
Advocate High Court  
Office No. 33 Adjacent to  
District Jail Abbottabad

Attested  
Muhammad Asghar Khan Farid

G

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Appeal No

1122/18

BEFORE CHAIRMAN "SERVICE TRIBUNAL  
KPK PESHAWAR

Mazhar Rauf No. 1039 ASI Elite Force Abbottabad.

VS

1. Govt. of KPK through Secretary Interior & Tribal Affairs  
KPK Peshawar.
2. Inspector General of Police KPK Peshawar
3. Regional Police Officer, Hazara Range Abbottabad.
4. Dstt. Police Officer Abbottabad.

Service Appeal: **NO 1122-A/18**

SERVICE APPEAL U/SEC 4 OF KPK SERVICE  
TRIBUNAL ACT 1974 FOR DECLARATION TO THE  
EFFECT THAT TWO YEARS REGULAR SERVICE OF  
THE APPELLANT HAS BEEN FOR FEAT BY  
RESPONDENT NO. 4 VIDE ORDER OB NO.42 DATED  
21-02-2017 DUE TO SO CALLED DELAY OF ONE  
MONTH 20 DAYS IN LODGING OF FIR NO. 625  
DATED 18-09-2017 U/SEC 380 PPC PS HAVELIAN  
WHICH IS AGAINST THE FACTS, PUNISHMENT OF  
FOR FEATURE OF TWO YEARS' SERVICE IS  
ILLEGAL AND TO BE SET ASIDE.

Alleged

Muhammad Khan-Jar  
District Police Officer  
Hazara Range  
Abbottabad

PRAYER: - On Acceptance of the instant service  
Appeal, it is prayed that impugned order of forfeiture  
of two years' service of the Appellant dated 21-02-  
2017 may be declared illegal and the same order may  
graciously be ordered to be set aside. Any other relief



which this honorable Court deem appropriate in the circumstances of the case may also be granted to the Appellant.

---

*Respectfully Shemeth;*

1. That the Appellant was serving as ASI in preventive side in PS Havelian w.e.f 22-06-2016 to 19-08-2016.
2. That one Moosa Khan S/o Sultan R/o Banda Sahib Khan, Havelian filed a complaint for lodging of FIR U/Sec 380 PPC on dated 16-08-2016 which was received by the Appellant through proper Channel on 18-08-2016. However, in the meanwhile, the Appellant was transferred from PS Havelian to police Line Abbottabad on 19-08-2016. Copy of complaint of Moosa Khan 16-08-2016 received in the DPO is attached as Annexure "A". The said Application as per remarks, received by the Appellant on 18-08-2018.
3. That as mentioned above, the Appellant was transferred from PS Havelian to Police line

Attested  
Moosa Khan  
Court of Patents  
Adjacent to

Abbottabad vide Order No. 192 19-08-2016. It is further Submitted that the Appellant received the message of transfer from PS Havelian to police line Via telephonic message. The Appellant submitted an application under Right to information Act 2013 for provision of proper transfer order dated 19-08-2016. But, Resp. No. 4 did not provide the same so, far copy of Application Under RIT Act 2013 is attached as Annexure "B".

4. That following this, the Appellant handed over the charge to Moharrar PS Havelian alongwith all documents as well as subject complaint of Moosa Khan 20-08-2016. Copy of handing over of charge report, relevant documents & Complaint of Moossa Khan is attached as Annexure "C".
5. That Respondent No.4 marked an inquiry wherein, delay of 1 month and 20 days in lodging of FIR on the Complaint of Moosa Khan dated 16-08-2016 has been attributed to the Appellant which is against the law & without lawful Justification. Copy of letter wherein inquiry against the Appellant has been ordered by Resp. No.4 is attached as Annexure "D".
6. That respondent No.4 served show cause notice upon the Appellant regarding delay of one month & 20 days in

Attended  
18/08/2016  
District Court & Sessions  
Abbottabad  
M

lodging of FIR on the complaint of the complainant Moosa Khan which is attached as Annexure "E".

7. That the Appellant properly replied to the show cause notice on 20-12-2016 Copy of reply to the show cause notice dated 30-12-2016 is attached as Annexure "F".
8. That the Appellant from the very beginning submitted applications as well as replies to the show cause notice that he received the complaint on 18-08-2016 from the DPO Office and therefore, he was transferred from PS Havelian to police line Abbottabad on 19-08-2016. Resultantly, the Appellant handed over the charge of post including all the documents and complaints on 20-08-2016. Therefore, question of delay of 1 month & 20 days in lodging of FIR on the complaint of Moosa Khan does not arise but even then, the two years of regular service has been forfeited vide order OB No. 42 dated 21-02-2017 which is against the facts and law on the subject. Therefore, forfeiture of two years of service, is liable to be Set aside. Feeling aggrieved, the Appellant filed departmental Appeal to next higher authority on 19-03-2017 which is attached as Annexure "F".
9. That the Appellant received rejection letter dated 18-05-2018 through his own sources which is attached as

*Altered*  
Official Seal of the Court of Sessions  
District Abbottabad  
Date: 23/11/2018  
Signature: [Handwritten]

Annexure "G". Hence, the instant service Appeal is filed inter alia on the following grounds.

GROUNDS

- a) That the impugned order dated 21-02-2017 is perverse, discriminatory, without lawful justification, against the facts & the same is liable to be set aside.
- b) That the Appellant has been made a scapegoat due to no fault of his the Appellant retained the complaint of Moosa Khan only for one day & the next day, the Appellant was transferred from PS Havelian on 18-08-2016. Therefore, the delay of one month & 20 day Cannot be attributed to the Appellant. Therefore, one-day delay has been stretched to one month & 20 day by the inquiry officer at his own sweet will just to spoil service career of the Appellant.
- c) That the employees of the police depth are to serve 24 hrs like that of employees of Defense Forces. Therefore, all the ins & outs of movement as well as records is maintained in the relevant registers. The Resp. No.4 while awarding punishment of two year of forfeiture of service of the Appellant did not bother to look into the reply to the show cause notices as well as the relevant record available in the PS Havelian. Therefore, forfeiture of 2 years of service is liable to be set aside.

*Attested*

*M. Khan*  
Officer in Charge  
PS Havelian

- d) That the Appellant is innocent, law abiding police officer & cannot think of committing mis carriage of justial. The Appellant served the deptt diligently and left no stone unturned in the smooth functioning of the deptt. Therefore, the Appellant cannot be penalized due to non-reading and mis reading of the official record which reveal that the Appellant received the Complaint of Moosa Khan on 19-08-2016. Hence, the Appellant has been punished just for nothing & due to the fault of his, ASI Chen Zeb.
- e) That the forfeiture of service comes within the meaning of terms & Condition of service. Therefore, Service tribunal has got jurisdiction to entertain and judicate upon the service Appeal of the Appellant.
- f) That there is no other prompt and efficacious remedy is available to the Appellant except the jurisdiction of the Service Tribunal.

### PRAYER

On Acceptance of the instant service Appeal, it is prayed that impugned order of forfeiture of two years' service of the Appellant dated 21-02-2017 may be declared illegal and the same order may graciously be ordered to be set aside. Any other relief which this honorable Court deem appropriate in the

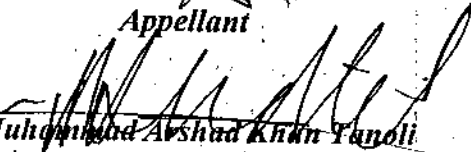
*Amended*

Moosa Khan  
Superintendent of Police  
District of Faisalabad  
Faisalabad  
20/08/2016

circumstances of the case may also be granted to the Appellant.

  
Appellant

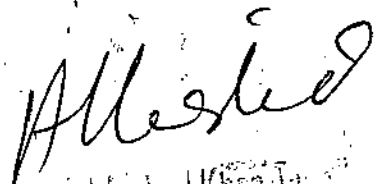
Through:

  
Muhammad Arshad Khan Tanoli  
Advocate High Court Abbottabad.  
Office No 33 Adjacent to  
Dist Bar Abbottabad

Verification:

It is verified that the contents of the Paragraph appeal are correct to the best of my knowledge & belief and nothing has been concealed from this honorable Court.

  
Appellant

  
Muhammad Arshad Khan Tanoli  
Advocate High Court Abbottabad.  
Office No 33 Adjacent to  
Dist Bar Abbottabad

P-39

BEFORE CHAIRMAN "SERVICE TRIBUNAL  
KPK PESHAWAR

Mazhar Rauf No. 1039 ASI Elite Force Abbottabad.

VS

1. Govt. of KPK through Secretary Interior & Tribal Affairs  
KPK Peshawar.
2. Inspector General of Police KPK Peshawar
3. Regional Police Officer, Hazara Range Abbottabad.
4. Dstt. Police Officer Abbottabad.

AFFIDAVIT

I MAZHAR RAUF S/o GHULAM MISKEEN Resident of Iqbal-Road Supply  
Abbottabad, do hereby solemnly affirm and declare on oath as under: -

Further affirmed that the contents of this affidavit are true and correct  
to the best of my knowledge and belief and nothing has been  
concealed therefrom.

  
DEPONENT

*Affirmed*  
Justice (Senior) Khair Khan  
Supreme Court of Pakistan  
Office of the Joint Public Advocate  
Islamabad

ANNEX-6

P-40

REPORT OF THE CHAIRMAN "SERVICE TRIBUNAL"

KPK PESHAWAR

Appeal No 1122/18



Muzhar Raitf. No. 1039 ASI Elite Force Abbottabad

Khyber Pakhtunkhwa Service Tribunal

Diary No. 1246

VS

Date 07-8-2018

- 1. Govt. of KPK through Secretary Interior & Tribal Affairs KPK Peshawar.
- 2. Inspector General of Police-KPK Peshawar.
- 3. Regional Police Officer, Hazara Range Abbottabad.
- 4. Dist. Police Officer Abbottabad.

Attested

Service Appellant

*[Handwritten signature]*

SERVICE APPEAL U/SEC 4 OF KPK SERVICE TRIBUNAL ACT 1974 FOR DECLARATION TO THE EFFECT THAT TWO YEARS REGULAR SERVICE OF THE APPELLANT HAS BEEN FORFEAT BY RESPONDENT NO. 4 VIDE ORDER OB NO. 42 DATED 21-02-2017 DUE TO SO CALLED DELAY OF ONE MONTH 20 DAYS IN LODGING OF FR NO. 625 DATED 18-09-2017 U/SEC 380 PPC PS EAVELIAN WHICH IS AGAINST THE FACTS, PUNISHMENT OF FOR FEATURE OF TWO YEARS' SERVICE IS ILLEGAL AND TO BE SET ASIDE.

Accepted by

*[Handwritten signature]*

PRAYER: On Acceptance of the instant service

Submitted by

*[Handwritten signature]*

Appelant, it is prayed that impugned order of forfeiture of two years' service of the Appellant dated 21-02-

Accepted by

2017 may be declared illegal and the same order may

graciously be ordered to be set aside. Any other relief

ATTESTED  
*[Handwritten signature]*  
Secretary



P-41

Service Appeal No.1122/2018 titled "Mazhar Rauf Vs. Government of Khyber Pakhtunkhwa through Secretary Interior & Tribal Affairs Khyber Pakhtunkhwa, Peshawar and others"



ORDER

24<sup>th</sup> Oct. 2023 Kalim Arshad Khan, Chairman: Learned counsel for the appellant and Mr. Asif Masood Ali Shah learned Deputy District Attorney alongwith Mr. Tanveer Ahmad DSP (Legal) for the respondents present.

2. Representative of the respondents submitted a compliance report which is undated and shown to have been signed by the District Police Officer, Abbottabad, as there is no name under the signature of the DPO, which act is against clear directions of the august Supreme Court of Pakistan given in 2022 SCMR page 439 titled "Province of Sindh & others Vs. Shahzad Hasnain Talpur". On the previous date, following order sheet was passed:

Admitted  
MM

"2. On 17.06.2022, the respondents were strictly directed to produce the entire service record of the appellant but the same has not been submitted. Firstly, it is observed that there is nobody, duly authorized, present before the Tribunal. Secondly, despite directions given more than a year ago for production of complete record, some of the record was produced while other seems to have been suppressed by the respondents, because of which, the Tribunal could not proceed, on which, the learned AAG had to make a request for adjournment for production of the entire record. It is observed that time of the Tribunal is being wasted by the respondents by intentionally not producing the commanded documents. It is lastly adjourned on payment of cc.st of Rs.10,000/- with direction to submit

*[Handwritten signature]*

ATTESTED  
*[Handwritten signature]*  
Secretary  
Service Tribunal  
Peshawar

P-42

(21)

entire service record of the appellant alongwith Register 5-A in original as well as extracts of the same and a written report to be submitted by the DPO himself regarding the officer deputed as custodian of Register 5-A and also any action taken against the concerned person because of whose negligence and misconduct, the alleged tempering in Register 5-A was facilitated, which was observed by the Inquiry Officer in his report. The requisite record shall be produced within 10 days at the Principal Seat, Peshawar. To come up for arguments on 24.10.2023 before D.B at Camp Court, Abbottabad. P.P given to the parties. Copy of this order sheet be sent to the Worthy Inspector General of Police to take action against the Officers for their slackness and to direct all the DPOs to depute well conversant officers not below Grade-17 alongwith all original record to assist the Tribunal as the cases are being delayed and also defeated because of none production of record and taking least interest by the concerned in pursuing and protecting the interest of the Government/Department".

*Attested*

*MM*

3. One of the allegations, on the basis of which the appellant was penalized, was that he had made alteration/addition in Register 5-A for which, LHC concerned held the appellant responsible for cutting. The report in respect of the above order sheet dated 26.09.2023, submitted by the DPO, Abbottabad, shows that he had deputed DSP Headquarters, Abbottabad as inquiry officer with the direction to inquire into the matter and submit his report on completion of inquiry proceedings. This being so, the learned counsel for the appellant as well as learned District Attorney

Page 2

ATTESTED

*[Signature]*  
 P. J. JINER  
 Khyber Pakhtunkhwa  
 Special Tribunal  
 Peshawar

*[Signature]*

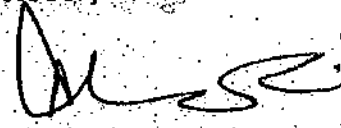
22

and DSP (Legal) are in view that as the DPO had himself started inquiry into the allegation of overwriting/cutting in the relevant column of Register 5-A, where-after, it could be ascertained as to who had made tempering in Register 5-A, therefore, the punishment awarded on the basis of such allegation would not at present stand. They further suggested that let the matter be remitted for de-novo inquiry for ascertaining the fact as to who had actually made overwriting/cutting in the relevant column of Register 5-A.

4. In view of the above, the matter is remitted to the District Police Officer, Abbottabad for passing appropriate, legal and justified orders and rest of the relief shall be subject to the outcome of de-novo inquiry which is to be held within 60 days from today, with reasons on conclusion of inquiry. The rest of the relief shall be subject to the outcome of de-novo inquiry which is to be held within 60 days from today. The DSP (Legal) present before the court is directed to communicate the orders to the DPO Abbottabad. Consign.

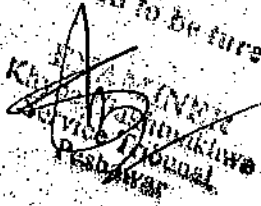
5. Pronounced in open Court at Abbottabad and given under our hands and seal of the Tribunal on this 24<sup>th</sup> day of October, 2023.

  
(Fareeha Paul)  
Member (E)

  
(Kalim Arshad Khan)  
Chairman

\*Mutazam Shah\*

Carried to be true copy

  
Kashmir  
Service Tribunal  
Srinagar

Date of Presentation of Application 02/11/2023  
Number of Words Page 3  
Copying Fee 15/-  
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23

S.A.# 122/2018

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Mogher Rauf vs Govt



26<sup>th</sup> Sept. 2023

1. Learned counsel for the appellant present. Mr. Asad Ali Khan,

Assistant Advocate General present. Nobody is present on behalf of the respondents.

2. On 17.06.2022, the respondents were strictly directed to produce the entire service record of the appellant but the same has not been submitted. Firstly, it is observed that there is nobody, duly authorized, present before the Tribunal. Secondly, despite directions given more than a year ago for production of complete record, some of the record was produced while other seems to have been suppressed by the respondents, because of which, the Tribunal could not proceed, on which, the learned AAG had to make a request for adjournment for production of the entire record. It is observed that time of the Tribunal is being wasted by the respondents by intentionally not producing the documents. It is lastly adjourned on payment of cost of Rs.10,000/- with direction to submit entire service record of the appellant alongwith Register 5-A in original as well as extracts of the same and a written report to be submitted by the DPO himself regarding the officer deputed as custodian of Register 5-A and also any action taken against the concerned person because of whose negligence and misconduct, the alleged tempering in Register 5-A was facilitated, which was observed by the Inquiry Officer in his report. The requisite record shall be produced within 10 days at the Principal Seat, Peshawar. To come up for arguments on 24.10.2023.

Asad Ali Khan

M

J

Certified to be true copy  
  
 KH. ASAD ALI KHAN  
 Service Tribunal,  
 Peshawar

before D.B at Camp Court, Abbottabad. P.P given to the parties.


Copy of this order sheet be sent to the Worthy Inspector General of

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Police to take action against the Officers for their <sup>slackness</sup> and to direct all the DPOs to depute well conversant officers not below Grade-17 along with all original record to assist the Tribunal as the cases are being delayed and also defeated because of non production of record and taking least interest by the concerned in pursuing and protecting the interest of the Government/Department.

  
(Salah-Ud-Din)  
Member (J)

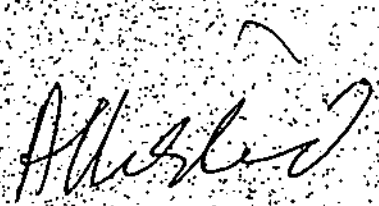
Mulazem Shah

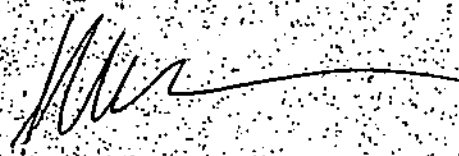
  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

Certificate to be for copy

  
Member  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Presentation of Application 22/11/23  
Number of Words Page 2  
Copying Fee 40/-  
Urgent 15/-  
Total 55/-  
Name of Complainant \_\_\_\_\_  
Date of Completion 22/11/23  
Date of Decision 22/11/23






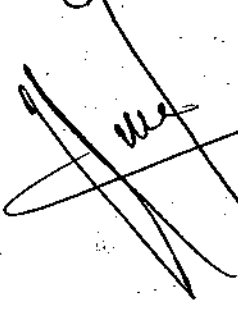
P-46  
CHARGE SHEET

Annex-11

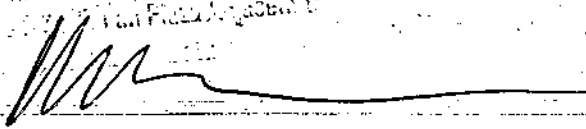
- 1). I, Umar Tufail (PSP) District Police Officer Abbottabad as competent authority hereby charge you SI Mazhar Rauf No. 43/H as explained in the attached statement of allegations.
- 2). You appear to be guilty of misconduct under Police Disciplinary Rules 1975 (amended 2014), and have rendered yourself liable to all or any of the penalties specified in the said Police Disciplinary Rules.
- 3). You are therefore, directed to submit your written defense within seven days on the receipt of this Charge Sheet to the Enquiry Officer.
- 4). Your written defense, if any shall reach the Enquiry Officer within the specified period, failing which it shall be presumed that you have no defense to put in and in that case ex-parte action shall follow against you.
- 5). Intimate whether you desire to be heard in person or otherwise.
- 6). A statement of allegations is enclosed.

  
(Umar Tufail) PSP  
District Police Officer  
Abbottabad

منہ جلال  
چار سب سے قدریہ کے لئے ہر جواب  
چار سب سے (08) فوجیات کے لئے  
دوسری ارسال کے لئے

  
13-11-2023





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**DISCIPLINARY ACTION**

I, Umar Tufail (PSP) District Police Officer Abbottabad as Competent Authority of the opinion that you **SI Mazhar Rauf No. 43/H** rendered yourself liable to be proceeded against as you committed the following act/omission within the meaning of Police Disciplinary Rules 1975 (amended 2014).

**STATEMENT OF THE ALLEGATIONS**

1. In compliance with the judgment of Honorable Service Tribunal Camp Court Abbottabad in appeal No. 1122/2018 titled Mazhar Rauf Versus Government of Khyber Pakhtunkhwa and others for conducting de-novo departmental enquiry against you on the allegations that a letter vide No. 815/C-Cell, dated 23-11-2016 received from worthy Regional Police Office, which was marked to DSP, Investigation, Abbottabad for preliminary enquiry. According to the report of DSP, Investigation, application of Musa Khan S/O Sultan, R/O Banda Sahib Khan, Havelian plaintiff/complainant of case FIR No. 625, dated 18-09-2016, U/S 380 PPC, Police Station Havelian was marked to you but you willfully failed to register FIR in time despite of having clear information about accused which shows your lack of interest and brought bad name for Police department.

2). For the purpose of scrutinizing your conduct with reference to the above allegations, **SP Cantt Abbottabad** is appointed as Enquiry Officer to conduct de-novo enquiry.

3). The Enquiry Officer shall in accordance with the provision of this ordinance, provide reasonable opportunity of hearing to you, record finding and make within stipulated period as desired by Khyber Pakhtunkhwa Service Tribunal Camp Court, Abbottabad vide order dated 24-10-2023, recommendation as to punishment or the appropriate action against you.

4). You are hereby directed to attend the proceedings on the due date, time and place fixed by the Enquiry Officer.

(Umar Tufail) PSP  
District Police Officer  
Abbottabad

No: 294 /PA, Dated Abbottabad the 08/11 /2023.

Copy to:

1. Enquiry Officer for initiating proceedings against the defaulter officer under provisions of the Police Disciplinary Rules 1975 (amended 2014) and submit findings within stipulated period.
2. **SI Mazhar Rauf No. 43/H** (delinquent official).

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Annex-I

الہ چارج شیٹ نمبر 294 مورخہ: 08/11/2023 مجاریہ، ڈی۔ پی۔ او آفس ایبٹ آباد

Judgement of Honorable Service Tribunal Camp Court Abbottabad in appeal No. 1122/2018

معرض خدمت ہوں کہ مختصر حالات یوں ہیں کہ حکم نمبر 850 رجسٹرڈ 5A ایک تحریری درخواست اذان موسیٰ خان ولد سلطان خان سکندہ بانڈہ  
ف خان کی درخواست۔

(1) مجھے مورخہ 18/08/2016 کو موصول ہوئی جو درخواست لف قابل ملاحظہ ہے

(2) مورخہ 08/19/2016 OB-No-142 کو میرا تبادلہ حویلیاں سے پولیس لائن ہوا ٹرانسفر آرڈر کاپی مجاریہ دفتر جناب ڈی۔ پی۔ او  
صاحب ایبٹ آباد ہمراہ لف قابل ملاحظہ ہے۔

(3) فرسٹ پینڈنگ کاغذات بصورت تبادلہ مورخہ 20/08/2016 بمطابق چارج رپورٹ حوالہ محرر تھانہ حویلیاں پینڈنگ کاغذات حوالہ  
کیئے گئے۔ جو چارج رپورٹ ہمراہ لف قابل ملاحظہ ہے۔

(4) پولیس لائن ضلع ایبٹ آباد مدد 18 روز ناچہ 20/08/2016 اپنی حاضری کو یقینی بنایا جسکی نقل اور حاضری ہمراہ لف قابل ملاحظہ ہے۔

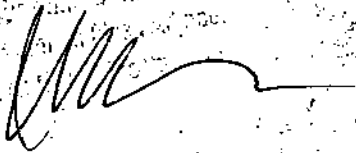
(5) میری ٹرانسفر ہو جانے کے بعد حکم نمبر 850 رجسٹرڈ 5A میں کٹنگ کے حوالہ سے محرر یا اسکا اسٹاف ہی بہتر وضاحت کر سکتا ہے۔

(6) مزید ابتدائی انکوری 2017 conduct میں مفصل جواب لف ہے۔

(7) جناب عالی میں اس وقت بھی بے گناہ تھا اور اب بھی بے گناہ ہوں۔

(8) گزارش ہے کہ چارج شیٹ داخل دفتر فرمائی جاوے۔





العارض

مظہر رؤف

43/H سب انسپشن ضلع مانسہرہ

13-11-2023



Annex- J P-49  
JOB - 302

DPO AT-B

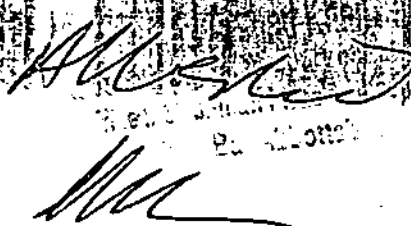
ORDER

21/12/23

This office order will dispose-off the De-novo departmental enquiry against SI Mazhar-Rauf No. 43/ H. In compliance with the judgment of Honorable Service Tribunal Camp Court Abbottabad in appeal No. 1122/2018 titled Mazhar Rauf Versus Government of Khyber Pakhtunkhwa and others for conducting de-novo departmental enquiry against him on the allegations that a letter vide No. 815/C-Cell, dated 23-11-2016 received from worthy Regional Police Office, which was marked to DSP, Investigation, Abbottabad for preliminary enquiry. According to the report of DSP, Investigation, application of Musu Khan S/O Sultan, R/O Banda Sahib Khan, Havelian plaintiff/complainant of case FIR No. 625, dated 18-09-2016, U/S 380 PPC, Police Station Havelian was marked to him but he willfully failed to register FIR in time despite of having clear information about accused which showed his lack of interest and brought bad name for Police department.

He was issued with Charge Sheet along with statement of allegations vide No. 294/PA dated 08-11-2023 and SP Cantt Abbottabad was appointed as Enquiry Officer to scrutinize the conduct of delinquent official. Enquiry Officer conducted de-novo departmental enquiry against the delinquent official and recorded statements of all concerned. After conducting de-novo departmental enquiry, the Enquiry Officer submitted his findings wherein allegations stands established against delinquent official. He was issued with Final Show Cause Notice vide No. 313/PA dated 07-12-2023. He was given ample opportunity of hearing but he had nothing plausible to state in his defense.

Therefore, in exercise of the powers vested in the undersigned Police Disciplinary Rules-1975 (Amended 2014), I, being District Police Officer, Abbottabad, as a competent authority, agreed with the punishment awarded to the delinquent official earlier which commensurate with his guilt hence, the punishment awarded vide this office OB No. 42 dated 21-02-2017 remain intact.



بخدمت جناب DIG صاحب ہزارہ ریجن ضلع ایبٹ آباد

**اپیل** بنا راضی مصدرہ بحوالہ آرڈر بک نمبری OB-302 مورخہ 21/12/2023 مجاریہ از دفتر جناب DPO صاحب ایبٹ آباد

Judgment of Honourable Service Tribunal Comp Court Abbottabad in  
Appeal No. 1122/2018

جس کے ذریعے مصوف نے میری 2 سال کی پسند ملازمت Denovo انگوائری ضبط فرما کر صاف ستھرا شفاف ریکارڈ ملازمت داغدار کرنے کے علاوہ مجھے مالی نقصان پہنچایا۔

**استدعا** ہے کہ رحم اپیل ہذا منظور فرماتے ہوئے متنازعہ آرڈر کا عدم اور منسوخ فرمایا جا کر انصاف فرمایا جاوے۔

جناب عالی! اپیل ذیل عرض ہے۔

1- یہ کہ سائل مورخہ 01/10/1991 کو محکمہ پولیس ضلع پشاور میں بطور پولیس کانسٹیبل بھرتی ہو کر زائد از 32 سال صاف ستھری خوش اسلوبی سے ملازمت کر کے اب بطور SI خدمت سرانجام دے رہا ہوں۔

2- یہ کہ سائل بدران تعیناتی تھانہ حویلیاں مجھے ایک درخواست ازاں موسیٰ خان ولد سلطان خان سکندہ بانڈہ صاحب مجھے SHO صاحب تھانہ حویلیاں نے مورخہ 18/08/2016 کو مارک فرمائی درخواست حکم نمبری 850/5A تھانہ حویلیاں جس کی فوٹو کاپی ہمراہ لف ہے قابل ملاحظہ ہے۔

3- یہ کہ سائل مورخہ 18/08/2016 کو برائے سپیشل ڈیوٹی پولیس لائن ایبٹ آباد بحوالہ مد 56 روزنامہ 18/08/2016 لف قابل ملاحظہ ہے۔ درخواست بالا تھانہ میں موجود تھی۔

4- یہ کہ مورخہ 19/08/2016 OB No -192 کو میرا تبادلہ حسب حکم افسران بالا حویلیاں سے پولیس لائن ایبٹ آباد ہوا۔ ٹرانسفر آرڈر لف قابل ملاحظہ ہے۔

5- یہ کہ مورخہ 20/08/2016 کو بمطابق فہرست پینڈنگ کاغذات بصورت تبادلہ چارج رپورٹ حوالہ محرر شاف تھانہ حویلیاں کی گئی۔ جو ہمراہ لف قابل ملاحظہ ہے۔

6- یہ کہ مورخہ 20/08/2016 کو پولیس لائن ایسٹ آباد میں اپنی حاضری کو بحوالہ مد 18 روز نامچہ 20/08/2016 یقینی بنایا۔ جس کی نقل ریٹ ہمراہ لف قابل ملاحظہ ہے۔

7- یہ کہ سائل کی ٹرانسفر ہو جانے کے بعد حکم نمبر 850/5A تھانہ حویلیاں بمطابق چارج رپورٹ مورخہ 20/08/2016 کو محرر سٹاف نے موصول کرنے کے بعد محرر محمد اشفاق نے یہ حکم نمبری کس کو مارک کی اور کب مارک کی۔ ایک ماہ دو دن لیٹ ہونے کی وجہ محرر ہی اس کی وضاحت کر سکتا ہے کیونکہ رجسٹر 5/A اس کی تحویل میں ہوتا ہے۔

8- یہ کہ فائینڈنگ SP صاحب Investigation ساجد خان کے پیرہ نمبر 3 پر Estatement محمد اشفاق محرر نے بیان دیا کہ ایک درخواست SHO صاحب نے ASI مظہر رؤف کو مارک کی اور اس کے بعد محرر کی ٹرانسفر تھانہ شیروان ہو گئی۔ حکم نمبری 850/5A کس کی پاس رہی اور ایک ماہ دو دن لیٹ ہوئی۔ SP صاحب انویکیشن اور نہ ہی کسی اور آفیسر نے محرر محمد اشفاق سے اور نہ ہی محرر سٹاف تھانہ حویلیاں سے اس نسبت استفسار کیا ہے۔ سائل نے اپنی تعیناتی کے دوران محرر محمد اشفاق پر بحوالہ مد 36 روز نامچہ 11/08/2016 کو ایک درخواست لیٹ ہونے کی صورت میں محرر کی غفلت پر رپورٹ ضبط تحریر میں لائی۔ جولف قابل ملاحظہ ہے۔

9- یہ کہ اسی طرح فائینڈنگ SP صاحب Investigation ساجد خان کے پیرہ نمبر 6 پر درج بیان جہانزیب خان ASI میرا تبادلہ ایک ماہ بعد تھانہ حویلیاں ہوا جو ایک درخواست 18/09/2016 کو ملی اور مقدمہ بجرم 380 PPC درج رجسٹرڈ کیا۔

10- یہ کہ محرر محمد اشفاق نے ایک ماہ قبل ہی جہانزیب ASI کے نام رجسٹر 5/A کے مطابق آدر اٹنگ کر کے مارک کر دی تھی۔ محرر محمد اشفاق یہاں پر کسی I/O کو پچانا جاتا ہے یا اپنی باطنی کو چھپا رہا ہے اس کی نسبت بھی SP Investigation اور نہ کسی دیگر آفسر نے پوچھ گچھ کی ہے۔ محرر محمد اشفاق کو فائینڈنگ SP Investigation صاحب نے بھی اپنی فائینڈنگ میں بھی محرر کو Guilty قرار دیا تھا لیکن کچھ ملازموں نے جو اختیار رکھتے تھے سزا جزا کا انہوں نے مجھے تو سزا دے دی لیکن محرر محمد اشفاق کو سزا نہ دی۔

11- یہ کہ صاحب Service Tribunal Judge کی Judgment / Order sheet 24-11-2023 کی نشاندہی پر محرر محمد اشفاق کو ابتدائی انکوائی مورخہ 10/02/2017 کے 06 سال 09 ماہ 14 دن کے بعد سزا دی گئی۔ اتنا عرصہ اس کو کس نے چھپائے رکھا اور کیوں۔ اس محرر محمد اشفاق کے خلاف بروقت کارروائی نہیں ہوئی کیوں۔ اس طرح سروس ٹریبونل جج صاحب نے اس کے مطابق Denovo انکوائری میرے وکیل کو اعتماد میں لیا اور Denovo کی اجازت دی۔

اس کے باوجود Denovo میں سائل کی سابقہ سزا کو Sustend پر رکھا۔ سروس ٹریبونل جج صاحب کے مطابق LHC پیرہ نمبر 3 میں نشاندہی کی کہ اس نے کس بیس پر آڈر اینٹنگ کی اور مظہر رؤف ASI پر الزام لگایا ہے جو اس کے متعلق کوئی ثبوت پیش نہ کر سکتا اور انہ وجوہات کی بناء پر آڈر شیت سروس ٹریبونل نے مورخہ 26/09/2023 کو -10,000 روپے جرمانہ کیا کہ مکمل ریکارڈ پیش کرے لیکن لیگل برانچ اس کے متعلق کوئی ریکارڈ نہ پیش کر سکی۔ آڈر شیت لف قابل ملاحظہ ہے۔ LHC صاحب سے Discuss کر کے کیا گیا؟ نہ تو درخواست کے حکم نمبری کا ذکر کیا بعد SHO Discuss صاحب پر درخواست کدھر گئی۔

یہ کہ پہلی جو انکوآری مورخہ 08/12/2016 کو کی گئی یہ انکوآری DSP لیگل حافظ جانس صاحب کو مارک کی کچھ تخففات کی بناء پر سائل نے انکوآری اس سے ہٹانے کی درخواست DPO صاحب ایبٹ آباد سے کی جو انکوآری ٹرانسفر ہو کر DSP Investigation صاحب سے آڈر اینٹنگ اور برادر درخواست ہائے سائل کے کھاتہ میں ڈال کر سائل کو سزا کیلئے تجویز کر دیا اور محرم محمد اشفاق کو سزا سے بجا دیا اور کوئی کارروائی نہ کی۔

یہ کہ اسی طرح درخواست دہندہ موسیٰ خان ولد سلطان خان سکنہ بانڈہ صاحب خان اپنی درخواست حکم نمبری 850/5A میں سائل کے خلاف کوئی الزام نہیں لگاتا لیکن بعد مشاورت پولیس ایک ماہ 20 دن بعد تمام الزام سائل کے ذمہ ڈال دیتا ہے کہ مظہر رؤف ASI نے بارگینگ کی اور میری درخواست لیٹ کی۔ وہ بیان جو درخواست کی صورت میں کہ میں نے ایک عورت جو چوری کرتی ہے جس کا نام مقدس بی بی ہے کو MOD صاحب کی عدالت میں شناخت کی ہے اور بعد مشاورت پولیس بیان دیتا ہے کہ میں نے اس عورت مقدس بی بی کی شناخت تھانہ کینٹ میں کی ہے۔ اگر میرے پاس اس کی درخواست حکم نمبری 850/5A سے پہلے آئی ہوئی تو مذکورہ موسیٰ خان جو درخواست ڈی پی او صاحب ایبٹ آباد کو دیتا ہے اس میں مجھ پر کوئی الزام نہیں لگاتا بعد مشاورت پولیس ایک SMS کے ذریعے مجھ پر الزام لگاتا ہے جو سراسر جھوٹ کا پولندہ ہے Denovo انکوآری میں SP ہیڈ کو اثر صاحب نے زبانی سن کر کہا کہ آپ بے گناہ ہے اب آپ چلے جائے جب آپ کی ضرورت ہوگی تو آپ کو دوبارہ بولا جائے گا۔ لیکن مجھے دوبارہ نہ بولا گیا۔ البتہ بعد میں مجھے Guilty ٹھیرا دیا اور میری سزا کو Sustend کر دیا۔ موسیٰ خان کی درخواست حکم نمبری 850/5A مورخہ 20/08/2016 کو محرم رشاد نے موصول کی تو 21/08/2016 سے لے کر اندراج مقدمہ تک یہ درخواست کس کے پاس تھی یہ کوئی ایک ماہ دو دن بنتے ہیں کسی افسر نے اس بارے میں محرم محمد اشفاق سے نہیں پوچھا۔ مجھے نارگٹ بتالینے پر میرے خلاف جھوٹے بیانات خود دے کر اور درخواست دہندہ سے دلو کر رجسٹر 5A میں آڈر اینٹنگ اور ربر کرنے کے باوجود Denovo انکوآری میں میری سزا کو Sustend رکھا۔

لہذا استدعا ہے کہ انصاف فرمایا جا کر میری رحم اپیل ہذا منظور فرمائی جا کر دی گئی ناجائز سزا کا اعدام اور منسوخ فرمائی

جا کر انصاف فرمایا جاوے۔

المرقوم: 07/01/2024



مظہر رؤف SI43H متعینہ پولیس لائن ایبٹ آباد

رابطہ نمبر: 03113112691







<p>380</p> <p>18.9.16</p> <p>625</p> <p>35</p> <p>35</p> <p>35</p>	<p>Handwritten notes in Urdu script.</p>	<p>Handwritten notes in Urdu script.</p>	<p>Handwritten notes in Urdu script.</p>
<p>Handwritten notes in Urdu script.</p>	<p>Handwritten notes in Urdu script.</p>	<p>Handwritten notes in Urdu script.</p>	<p>Handwritten notes in Urdu script.</p>

Handwritten title or header in Urdu script.

7	81.7.16	-	-	11	1-11-16	Handwritten notes
1	26.9.16	-	-	11	5.10.16	Handwritten notes
5	28.9.16	-	-	11	4.10.16	Handwritten notes
2	29.9.16	-	-	11	2.10.16	Handwritten notes
1	21.9.16	-	-	10	1.10.16	Handwritten notes
1	19.9.16	-	-	9	30.9.16	Handwritten notes
1	18.9.16	-	-	7	28.9.16	Handwritten notes
	Handwritten notes	Handwritten notes	Handwritten notes	Handwritten notes	Handwritten notes	Handwritten notes



<p>۱ ۸۰۰۰۰ ۱۰۰۰۰ ۹۰۰۰۰</p>			<p>۱۰۰۰ ۱۰۰۰ ۱۰۰۰ ۱۰۰۰</p>		<p>۱۰۰۰ ۱۰۰۰</p>
<p>۱۰۰۰۰ ۱۰۰۰۰ ۱۰۰۰۰</p>	<p>۱۰۰۰۰</p>	<p>۱۰۰۰۰</p>	<p>۱۰۰۰۰</p>	<p>۱۰۰۰۰</p>	<p>۱۰۰۰۰</p>

اطلاعات مربوط به حسابهای مختلف و غیره  
اطلاعات مربوط به حسابهای مختلف و غیره

<p>۱۰۰۰۰</p>	<p>۱۰۰۰۰</p>

اطلاعات مربوط به حسابهای مختلف و غیره