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

CM No. _____ of 2024

In

Appeal No. 262-A/2023

Mr. Syed Asim Shah

...APPELLANT

VERSUS

Senior Member Board of Revenue etc

...RESPONDENTS

APPEAL

**APPLICATION FOR ANNEXING DOCUMENTS
INDEX**

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1.	Application for annexing documents alongwith affidavit	--	1-2
2.	Copy of Documents	--	3-15
8.	Vakalat Nama already placed on file	--	

...APPELLANT

Through:

Dated: 17/4/2024

(SARDAR MUHAMMAD ASIF)

&

(MUHAMMAD ASJAD PERVEZ ABBASI)
Advocates High Court, Abbottabad.

82-04-24
Pesh.

①

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

CM No. _____ of 2024

Khyber Pakhtunkhwa
Service Tribunal

In

Diary No. 12239 Appeal No. 262-A/2023

Dated 17/4/24

Mr. Syed Asim Shah

...APPELLANT

V E R S U S

Senior Member Board of Revenue etc

...RESPONDENTS

APPEAL

APPLICATION FOR SUBMISSION TO FILE
ADDITIONAL DOCUMENTS.

Respectfully Sheweth,

Facts leading to instant application are as under:-

1. That, the titled Appeal is pending adjudication before this Hon'ble Tribunal and is fixed for 22.04.2024.
2. That, certain documents are required to be placed on file in order to the just conclusion in matter in hand.
3. That, valuable rights of the appellant are involved.
4. That, appellant suffer irreparable loss if documents are not placed on file.

2


It is, therefore, humbly prayed that on acceptance of instant application, the documents be allowed to be filed and be deemed to be integral part of appeal for the ends for justice.

...APPELLANT

Through:

Dated: 17/4/2024


(SARDAR MUHAMMAD ASIF)
&

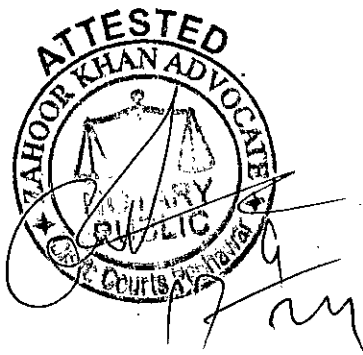

(MUHAMMAD ASJAD PERVEZ ABBASI)
Advocates High Court, Abbottabad.

AFFIDAVIT

I, Muhammad Asjad Pervez Abbasi Advocate, counsel for the **Appellant**, do hereby declare that the contents of instant **Application** are true and correct as per information furnished by my **client** and that nothing has been concealed from this Honourable Court.


Dated:- 17/4/2024


DEPONENT



3

133

	GOVERNMENT OF KHYBER PAKHTUNKHWA, BOARD OF REVENUE, REVENUE & ESTATE DEPARTMENT.
091-9213989	Peshawar Dated the 29/04/2021
	091-9214208

NOTIFICATION:

No. Estt: I/PF/Shorin Shah/_____ In pursuance of judgment dated 09.09.2020 passed by Additional Session Judge / Judge Model Criminal Trial Court (MCTC), Charsadda in Sessions Case No. 36/SC/MCTC titled Syed Bakhtwar Shah Versus Syed Shorin Shah and in continuation to this Department Notification bearing No. Estt: I/ PF/Shorin Shah/18823-28 dated 06.09.2017, the Competent Authority is pleased to release pension and other pensionary benefits in respect of Mr. Shorin Shah Ex-Tehsildar retired on attaining the age of superannuation i.e. 60 years w.e.f 30.04.2017 (A.N).

His date of birth is 01.05.1957.

By order of
Senior Member

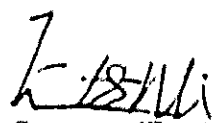
No. Estt: I/PF/Shorin Shah/ 2733-43

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa.
2. Commissioner Peshawar Division, Peshawar.
3. Additional Session Judge / Judge Model Criminal Trial Court (MCTC), Charsadda with reference to judgment dated 09.09.2020.
4. Deputy Commissioner Nowshera & Charsadda.
5. District Accounts Officer, Nowshera Charsadda.
6. Section Officer (Opinion-I), Law, Parliamentary Affairs and Human Rights Department with reference to his letter No. SO(OP-I)/LD/5-3/2012-Vol-IV/11573-75 dated 18.11.2020 & No. SO(OP-I)/LD/5-3/2012-Vol-IV/823-25 dated 21.01.2021.
7. Section Officer (R-IV), Establishment Department with reference to his letter No. SOR-IV(ED)/14-1/2020 dated 14.12.2020.
8. Section Officer (SR-II), Finance Department with reference to his letter No. FD/SOSR-II/4-36/2020/85 dated 25.01.2021.
9. PS to Senior Member, Board of Revenue.
10. Officer concerned.
11. Office Order File.

ATTESTED

to be true copy
Advocate


Assistant Secretary (Estt:)



GOVERNMENT OF
KHYBER PAKHTUNKHWA
SUPERINTENDENT OF POLICE
INVESTIGATION CHARSADDA
PHONE No. 091-9220063

To: - The Deputy Commissioner,
Charsadda.

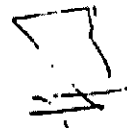
No. 2351 /Invest: dated Charsadda the 24 /08/2015.

Subject: - CASE FIR No. 501, DATED 17-08-2015 U/S 302/34-PPC PS CHARSADDA.

Memo:-
It is submitted that accused Asim s/o Shaureen Bacha r/o Utmanzai Parich
Khel was charged in the above subject case. During investigation, it has come to know
that the above ... sed is serving as Naib Tehsildar at District Charsadda.

It is therefore, requested that the above named accused Naib Tehsildar
may kindly be proceeded departmentally being involved in the subject case under
intimation to this office, please.

Encl: 1 copy e...


Head of Investigation,
District Charsadda.

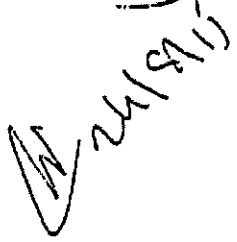
No. 1 /Inv:
Copy to CIO PS Charsadda for similar action w/r to his report dated 20-08-2015.

Important

EA/DK

For m/o under the
rules p.

6357
24/8/2015



ATTESTED

copy
APPROVED

MAJI PSCHD
17-8-2015

5



GOVERNMENT OF KHYBER PAKHTUNKHWA
LAW, PARLIAMENTARY AFFAIRS &
HUMAN RIGHTS DEPARTMENT

No. SO(OP-I)/LD/5-4/2012-VOL-I/16712-13.
DATED: PESH: THE 24 MAY, 2017

To

The Secretary to Government of Khyber Pakhtunkhwa,
Revenue & Estate Department

Attention: Assistant Secretary (Estt).

Subject: ADVICE.

RECEIVED
No. 3343-
Date 24/5/17
Govt. of Khyber Pakhtunkhwa

S- Pesh
a
:-
5

Dear Sir,

P-1511/2 I am directed to refer to your Department's letter No. Estt:/PF/Shaurin Shah/10138 dated 17.05.2017 on the subject noted above and to state that the Revenue & Estate Deptt: may provide the following documents for further process in the subject matter:-

- 1) Notification of the Inquiry,
- 2) Statement of allegation,
- 3) Charge Sheet,
- 4) Copy of FIR,
- 5) Suspension Notification dated 22-09-2015.

Accepted

g/e
23/5
21/5/17

Yours Faithfully,

[Signature]
Section Officer (Opinion-I)

Endst: of even No. & date.

A copy is forwarded to the P.S to Secretary Law Department.

Section Officer (Opinion-I)

[Signature]
Advocate



6

OFFICE OF THE
COMMISSIONER PESHAWAR DIVISION
PESHAWAR

PS/SMBR
By No. 5176
Date 7/9/15
Govt of Khyber Pakhtunkhwa

No.2-21/Misc: Compl/Eng/AR/2015 9/26
Dated 03.09.2015.

To,

The Secretary Board of Revenue
Khyber Pakhtunkhwa.

Subject: CASE FIR NO.501 DATD 17.08.2015 U/S 302/34-PPC-PS CHARBADDA.

I am directed to refer to the subject noted above and enclose herewith a copy of Deputy Commissioner Nowshera letter No. 5366—67/PS/DC/NSR/2015 dated 02/09/2015 alongwith its enclosures for further necessary action under information to this office at the earliest, please.

11/1/15
2

[Signature]
Assistant to Commissioner (Rev/G.)
Peshawar Division, Peshawar

No.2-21/Misc: Compl/Eng/AR/2015 9/27-28

Copy forwarded to the:-

1. Deputy Commissioner, ~~Charbadda~~ for information please.
2. PS to Commissioner, Peshawar.

2/9/15

[Signature]
Assistant to Commissioner (Rev/GA)
Peshawar Division, Peshawar

[Handwritten signature]

[Handwritten notes]
10/9/15

ATTESTED
copy
10/9/15

7

102

GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT
Peshawar dated the 06/09/2017

NOTIFICATION.

No.Estt:I/PF/Shorin Shah/ 18822 On attaining the age of superannuation, Mr. Shorin Shah Ex - Tehsildar Nowshera shall stand retired from Government Service with effect from 30.04.2017 (AN). His pension and other benefits are hereby withheld till further order.

His date of birth is 01.05.1957.

By order of
Senior Member

No.Estt:I/PF/Shorin Shah/ 18823-28

Copy forwarded to the: -

1. Accountant General Khyber Pakhtunkhwa.
2. Commissioner, Peshawar Division, Peshawar.
3. Deputy Commissioner Nowshera.
4. District Accounts Officer, Nowshera.
5. Official concerned.
6. Office order file.


Assistant Secretary-(Estt:)

ATTESTED

to be true copy
Advocate

8

19/5

GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT
Peshawar dated the 06/09/2017

NOTIFICATION.

No.Estt:/PF/Shorin Shah/ 18822 On attaining the age of superannuation, Mr. Shorin Shah Ex - Tehsildar Nowshera shall stand retired from Government Service with effect from 30.04.2017 (AN). His pension and other benefits are hereby withheld till further order.


His date of birth is 01.05.1957.

By order of
Senior Member

No.Estt:/PF/Shorin Shah/ 18823-28

Copy forwarded to the: -

1. Accountant General Khyber Pakhtunkhwa.
2. Commissioner, Peshawar Division, Peshawar.
3. Deputy Commissioner Nowshera.
4. District Accounts Officer, Nowshera.
5. Official concerned..
6. Office order file.


Deputy Commissioner
Nowshera


Assistant Secretary (Estt.)

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to be true copy
Advocate



9

GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT

Finance Department Civil Secretariat Peshawar <http://www.finance.gkp.pk>

facebook.com/GoKPFD

Dated Peshawar the 19.04.2023

NO.SOSR-II/FD/1-18/2022

To

Assistant Secretary (Estt.),
Board of Revenue, Revenue & Estate Department,
Khyber Pakhtunkhwa.

Subject:- ADVICE REGARDING GRANT OF LEAVE ENCASHMENT.

P-44/10
I am directed to refer to your letter No.Fstt://PF/Shorin Shah/2396 dated 25.01.2023 on the subject cited above and to state that the reduction of Leave in case of Cash Compensation (in lieu of LPR) is subject to taking of leave of any kind including Extra-Ordinary Leave without pay during the last 12 months of service by a retiring Government servant. In case the suspension period was not treated as kind of leave, then such period will not be included under the existing rules/policy and order.

17/04/2023
SECTION OFFICER (SR.II)

Copy
27/4/23
ATTACHED

copy

NO. 879-80 /DC/DK-1

11/3

Dated Chd Uu 02/9/2015.

(10)

TO

General Order
By No. 3498
Date 4/9
District Charsadda

The Secretary,
Board of Revenue Khyber,
Peshawar.

Sub.: Case F.I.R. no. 501, Dated 17.8.2015 u/s. 302/34.

AS B500
N

Enclosed is a copy of letter no. 2351/Invest.
dated 24/8/2015 alongwith its enclosure received
from Head of Investigation District Charsadda
for further proceedings please.

DEPUTY COMMISSIONER
CHARSADDA

Wahid
est
8/9

Copy forwarded to the Head of Investigation
Khyber Pakhtunkhwa Superintendent of
Police Inv: Charsadda for information w/y to above.

DEPUTY COMMISSIONER
C. L. D. A.

Signature
8/9/15

ATTESTED
to be true copy
Advocate

(11)

117

GOVERNMENT OF KHYBER PAKHTUNKHWA
BOARD OF REVENUE
REVENUE & ESTATE DEPARTMENT

Peshawar dated 27/09/2015

NOTIFICATION.

No.Estt:I/PF/(Shorin Shah) / _____ The Competent Authority is pleased to place Mr. Shorin Shah, Tehsildar Nowshera under suspension as involved in case FIR No. 501 registered in Police Station Utmanzai District Charsadda dated 17.08.2015 under section 302/34 with effect from 17.08.2015.

He will draw subsistence allowance as admissible under the rule :

By Order of
Senio Member

No.Estt:I/PF/(Shorin Shah) / 20633-39

Copy forwarded to the :-

1. Commissioner, Peshawar Division Peshawar with reference to his letter No.2-21/Misc: Compl/Enq/AR/2015/S126, dated 03.9.2015.
2. Deputy Commissioner, Charsadda with reference to his letter No.879-80/DC/DK-1, dated 02.9.2015.
3. Deputy Commissioner, Kohistan Upper alongwith copy of letter No. No.879-80/DC/DK-1, dated 02.9.2015 received from Deputy Commissioner Charsadda for further necessary action being Appointing Authority of Kailungo/Patwaris.
4. Deputy Commissioner, Nowshera.
5. District Account Officer, Nowshera and Kohistan Upper.
6. Official concerned.
7. Personal file.


Secretary-I

ATTESTED

to be this copy
Attocate



12

**GOVERNMENT OF KHYBER PAKHTUNKHWA
LAW, PARLIAMENTARY AFFAIRS &
HUMAN RIGHTS DEPARTMENT**

No. SO(OP-I)/LD/5-4/2012-VOL-I/11225
DATED: PESH: THE 29 JUNE, 2017

3492

9/16/17

To

The Secretary to Government of Khyber Pakhtunkhwa,
Revenue & Estate Department

Attention: Assistant Secretary (Estt).

Subject: ADVICE.

Dear Sir,

I am directed to refer to your Department's letter No. Estt:/PF/Shorin Shah/11225 dated 29.05.2017 on the subject noted above and to state that in accordance with CSR-194 when a Govt: Servant is involved in a criminal case, and if he is not arrested, the Competent Authority may suspend him by specific Order and in the instant case he has already been suspended by the Competent Authority under the aforesaid CSR.

2. The Govt: Servant has now reached to the age of superannuation, therefore, the Competent Authority may issue his retirement Order/ Notification and on his conviction by the Court, the Competent Authority may withheld his pension or, part of his pension under Rule-1.8(a) of the Pension Rules, 1963.

3. Moreover, being a service/ financial matter, Establishment & Finance Departments may also be consulted.

Yours Faithfully,

Section Officer (Opinion-I).

Endst: of even No. & date.

A copy is forwarded to the P.S to Secretary Law Department.

ATTACHED
to be
Approved

Section Officer (Opinion-I)

دولت کو نقد سہارا (KPK SMBR) ڈی او

کیفیت ضابط

Bstt.

13

87

درویشی اور سماجی بہبود

Dy No - 1097
Date - 18/2/2021
Govt of Punjab

19/2

ضابطہ عالی 1 مذکورہ میں ہے کہ سالانہ ایک دو ٹیوٹو میں کیفیت کے بارے میں
 توجیہ دینی سہرا انجام دے گا لہذا، اس میں دوران
 سال 2015 سے لے کر 2020 تک ہر سال کے لیے ایک دو ٹیوٹو میں
 درجہ میں ہر سال کے لیے ایک دو ٹیوٹو میں ہر سال
 اندازاً سال 2020 میں لے کر ہوا۔ فنڈ کی صورت
 میں نقدی روٹو ڈسٹری بیوٹن میں لے کر
 میں قبیلوں میں و ڈسٹری بیوٹن میں لے کر ان میں لے کر ان میں
 تے LA2 ڈسٹری بیوٹن میں لے کر طلبہ کو دیا
 حق ہوا ہے۔ اندازاً ان میں لے کر ان میں لے کر ان میں
 Establishment سے لے کر طلبہ کو دیا ہے۔ وہ لے کر

MBR-II

SMBR
18/2/2021

Seal-I

MBR-II

رہ کر کے قابل دفتر فنڈ میں لے کر ہے۔ ان میں لے کر ہے
 کہ سالانہ میں ہر سال کے لیے ایک دو ٹیوٹو میں لے کر ان میں

منز کو روٹو ڈسٹری بیوٹن میں لے کر ان میں لے کر ان میں
 23/2/2021

Handwritten signature

درویشی اور سماجی بہبود



D.C. Charsadda. (14)

(8)

~~7/10~~

عدد 16 اشداء
رپورٹ
NOTIFICAT
No.F

بھالارخان سیدر Asi وقت 8:15 بجے
اس وقت طاہر خان Asi 8:45 بجے
نے بزرگیم سٹی فون اشداء دی کہ فرور
بھور شاہ جو حوالہ مقدمہ No 78
قبرم 324 ہے قمار چار سدرہ میں زیر
داخل ہسپتال تھا زخموں کے تاب نہ لاکر
خان محی بھوٹکے لوعہ شرم شرم
کے 324 کے خانے 302 عام فی خانے
س اشداء درج روزنامہ
پورک لنگر حوالہ عدنان 10 دیا جائے


جانے کی
تعاہدات

~~Thani~~
mm CHD
17-8-15

ATTESTED

بندہ کا تعلق ہوگا یا اس کی مہر انشان لگا جائے۔ اگر اس وقت تک نہ ہو تو ابتدائی انشان کا دستخط اور تصدیق ہوگا۔ جوف الف یا ب سرخ رو دانی سے بالفاظ ۲۶
بندہ کے باشندگان ملاقات نہیں یا سدا ایشیا یا انڈیا میں وہاں سے ہوں، کچھ اپنے ہے۔

15

	GOVERNMENT OF KHYBER PAKHTUNKHWA, BOARD OF REVENUE, REVENUE & ESTATE DEPARTMENT.
091-9212726	Peshawar Dated the <u>08/06/2023</u>
091-9214208	

NOTIFICATION

No. Estt: I/PF/Shorin Shah/ 14301-09 Whereas, Mr. Shorin Shah,
Ex-Tehsildar (BS-16) Nowshera on attaining the age of superannuation stand retired from
Government Service w.e.f. 30.04.2017 (A.N).

2. AND WHEREAS, he had not availed L.P.R at his credit and lump sum payment equal to 365 days is admissible to him.


3. NOW THEREFORE, in pursuance of Rule-20 of the Khyber Pakhtunkhwa Civil Servants, Revised Leave Rules, 1981 read with Finance Department, Khyber Pakhtunkhwa, Notification No. SO(FR)FD/5-92/2005/Vol:V, dated 13/12/2012, sanction is hereby accorded to grant of leave encashment in lieu of L.P.R for a maximum period of 365 days in lump-sum in favour of Mr. Shorin Shah, Ex-Tehsildar (BS-16) Nowshera.

With the approval of
Competent Authority

No. & Date Even.

Copy forwarded to the: -

1. Commissioner Peshawar Division, Peshawar.
2. Deputy Commissioner Nowshera.
3. District Accounts Officer, Nowshera.
4. Section Officer (SR-II), Finance Department with reference to his letter No. SOSR-II/ FD/1-18/2022 dated 19.04.2023.
5. SPS to Senior Member, Board of Revenue.
6. PS to Member-III, Board of Revenue.
7. PA to Secretary-I, Board of Revenue.
8. Officer concerned.


(NOOR KHAN)
Assistant Secretary (Estt)
Board of Revenue

ATTESTED
to be true copy
Advocate