

IN HIGH COURT OF SINDH, CIRCUIT COURT,  
HYDERABAD

C.P. No. D-121 of 2026  
(Rehan Ahmed Siyal v. Province of Sindh and others)

PRESENT:  
MR. JUSTICE ARBAB ALI HAKRO  
MR. JUSTICE RIAZAT ALI SAHAR

Petitioner : Rehan Ahmed Siyal through Mr.  
Faisal Ali Raza Bhatti, Advocate.

Respondents No.1to6: Province of Sindh & others through  
Mr. Rafique Ahmed Dahri, Assistant  
A.G. Sindh along with Inspector  
Muhammad Changal on behalf of  
SSP Hyderabad, SIP Muneer Ahmed  
on behalf of SHO PS Bhitai Nagar  
and SIP Muhammad Kashan  
Khanzada PS Cantonment  
Hyderabad on behalf of SHO PS  
Cantonment Hyderabad.

Respondents No.7&8: Imam Bux and Ali Murad through  
Mr. Imtiaz Ali Abbasi, Advocate.

Date of Hearing : 12.03.2026

Date of Decision : 12.03.2026

**J U D G M E N T**

**RIAZAT ALI SAHAR J:** - Through this judgment, we propose to  
decide the instant constitutional petition filed by the petitioner, with  
the following prayers:-

- i. That, this Honorable Court may be pleased to quash the  
FIRs vide Crime No.131/2025 U/S: 489-F, PPC lodged at  
PS Cantonment and FIR No.322/2025 U/S: 489-F, 420  
PPC at PS Bhitai Nagar along with proceedings if any  
and direct the respondent No.08 to amalgamate the  
cheques of FIR No.131/2025 of PS Cantonment and FIR  
No.322/2025 in his earlier/first FIR No.190/2025 U/S:  
489-F PPC of PS Bhitai Nagar.*
- ii. That, this Honorable Court may kindly be pleased to  
suspend the operation of FIR No. 131/2025 U/S: 489-F  
PPC PS Cantonment and FIR No.322/2025 U/S: 489-F,  
420 PPC of PS Bhitai Nagar Hyderabad, and restrained  
the respondents No.05 & 06 not to furnish the charge*

*sheets in aforesaid case/crimes fill decision of instant petition.*

- iii. Cost of the petition be borne from the respondent No.07 & 08.*
- iv. Any other relief may be pleased to grant deem fit and proper.*

2. The petitioner, a businessman, has invoked constitutional jurisdiction under Article 199 of the Constitution assailing registration of multiple FIRs arising out of a single monetary transaction. The record reflects that respondent No.7, Imam Bux, lodged FIR No.190/2025 under Section 489-F PPC at Police Station Bhitai Nagar, Hyderabad, alleging that the petitioner, with whom he had business dealings, received a substantial amount for property transactions and upon demand, issued three cheques which were subsequently dishonoured. It is further the case of the petitioner that out of the same series of cheques and transaction, one cheque was allegedly handed over to respondent No.8, who got it dishonoured and lodged a separate FIR No.131/2025 at Police Station Cantt, Hyderabad, while another cheque resulted in FIR No.322/2025 at Police Station Bhitai Nagar under Sections 489-F and 420 PPC. The petitioner stated that all three FIRs arise out of the same transaction and issuance of cheques forming part of one liability, therefore, constituting a single cause of action. It is his grievance that registration of multiple FIRs has subjected him to parallel criminal proceedings in respect of one transaction, which is contrary to settled principles of criminal law.

3. Respondent No.2/SSP Hyderabad, in his written statement, has taken the stance that he is only a formal party and no specific allegation has been leveled against him. It is stated that the dispute between the petitioner and private respondents pertains to a monetary/business transaction, in consequence whereof FIRs No.131/2025, 190/2025 and 322/2025 were registered at different police stations. The concerned SHOs have reported that investigations were conducted on merits and after completion, challans have already been submitted before competent courts. It is further stated that the petitioner did not approach the SSP for

redressal prior to filing the instant petition; hence, dismissal of the petition.

4. Learned counsel for the petitioner contends that the impugned FIRs are a clear abuse of process of law as they stem from a single business transaction and a series of cheques issued towards one liability. He contends that once FIR No.190/2025 was registered, all subsequent dishonoured cheques ought to have been made part of the same case through supplementary statements or challan, rather than giving rise to fresh FIRs. Learned counsel by relying upon the law laid down in case of Mst. Sughran Bibi<sup>1</sup> and subsequent judgments, including the case of Hamid Khan<sup>2</sup>, contends that multiple FIRs for the same transaction are not permissible. He further contends that continuation of parallel proceedings violates protection against double jeopardy and subjects the petitioner to undue harassment, hence, the subsequent FIRs are liable to be quashed.

5. Learned A.A.G. Sindh contends that the FIRs were registered in accordance with law upon complaints of dishonoured cheques and the police fulfilled its statutory duty under Section 154 Cr.P.C. He further contends that disputed questions of fact are involved, which cannot be adjudicated in constitutional jurisdiction, and the petitioner may seek remedy before the trial court in accordance with law.

6. Learned counsel for private respondents No.7 and 8 (complainants) contends that each dishonoured cheque constitutes a separate offence under Section 489-F PPC, giving rise to an independent cause of action. He contends that the petitioner deliberately issued multiple cheques knowing fully well that funds were insufficient, thereby committing distinct offences on each dishonour. He contends that the petitioner cannot seek refuge under technicalities to avoid criminal liability and the registration of separate FIRs is justified in the facts of the case, as such, he prayed for dismissal of the petition.

---

<sup>1</sup> Mst. Sughran Bibi v. The State (PLD 2018 SC 595)

<sup>2</sup> HAMID KHAN v. The STATE (2022 MLD 31)

7. We have given anxious consideration to the submissions made by learned counsel for the parties and have carefully examined the material placed on record. The controversy in the present petition essentially revolves around the registration of multiple FIRs arising out of a single business transaction between the petitioner and private respondents, whereby a series of post-dated cheques were allegedly issued and subsequently dishonoured. The admitted position emerging from the record is that all such cheques formed part of one composite transaction, having a common origin, purpose, and continuity and were admittedly within the knowledge and possession of the complainant at the time when the first FIR bearing Crime No.190/2025 was lodged. Despite such knowledge, subsequent FIRs bearing Crime No.131/2025 and Crime No.322/2025 were registered at different police stations on the basis of the same transaction, thereby fragmenting a single cause of action into multiple criminal proceedings.

8. It is noted that the settled principles governing criminal jurisprudence are that while Section 154, Cr.P.C. does not, in its literal sense, impose an absolute bar upon registration of more than one FIR, yet such permissibility is conditioned upon the disclosure of distinct and separate cognizable offences. Where the allegations arise out of the same transaction, having unity of purpose, proximity of time and continuity of action, the registration of multiple FIRs is not only unwarranted but also amounts to an abuse of the process of law. The concept of "same transaction" has consistently been interpreted to mean a series of acts so connected together as to form one continuous whole and the facts of the present case squarely fall within such parameters. It is also an admitted feature of the case that the complainant, at the time of lodging the first FIR, was already in possession of all the cheques in question. The deliberate omission to disclose the entire set of facts and subsequent resort to multiple criminal proceedings reflects a calculated attempt to use the criminal justice system as a coercive mechanism for recovery of alleged dues. Such practice has been deprecated by superior Courts, which have repeatedly held that the provisions of Section 489-F, P.P.C. are intended to ensure credibility in financial transactions

and not to be employed as a tool for arm-twisting or recovery of money. The conduct of splitting claims and initiating successive prosecutions challenges the principles of fairness, transparency and propriety, which form the bedrock of both civil and criminal adjudication. Furthermore, the analogy drawn from the principle embodied in Order II, Rule 2, C.P.C., though not directly applicable to criminal proceedings, offers valuable guidance in the present context. It mandates that the whole claim arising out of a cause of action must be brought forward at one time and the omission to do so precludes subsequent litigation on the same cause. Applying similar reasoning, it was incumbent upon the complainant to disclose the entire transaction at the time of lodging the first FIR, enabling the investigating agency to conduct a comprehensive investigation and submit a complete report before the competent Court. The failure to adopt such course has resulted in multiplicity of proceedings, unnecessary burden on the judicial system and potential prejudice to the accused.

9. The role of the investigating agency in such matters is also of pivotal importance. It is the duty of the Investigating Officer to ascertain the truth in its entirety and not to remain confined to a fragmented version of events. The law empowers the Investigating Officer to incorporate subsequent developments or additional facts through supplementary statements and reports under Section 173, Cr.P.C., thereby ensuring that all aspects of a single transaction are examined within one cohesive framework. The resort to separate FIRs in such circumstances reflects a deviation from established legal procedure and calls for corrective measures. In the present case, the record further reveals that the investigations in the impugned FIRs have already been completed and challans have been submitted before the competent Courts. However, the mere submission of challan does not validate proceedings that are inherently flawed or initiated in contravention of settled legal principles. This Court, in exercise of its constitutional jurisdiction, is vested with the authority to prevent abuse of process and to secure the ends of justice, even at a stage where alternate remedies may be available. The peculiar facts of the case, coupled with the apparent

misuse of criminal proceedings, justify the invocation of such jurisdiction.

10. Another significant aspect pertains to the protection guaranteed under the law against double jeopardy and multiplicity of prosecutions. Subjecting a person to repeated criminal proceedings on the basis of the same transaction not only offends the spirit of double jeopardy but also militates against the broader principles of fairness and due process. The petitioner cannot be compelled to face multiple trials emanating from one and the same set of allegations, particularly when the entire dispute is rooted in a financial transaction which predominantly bears a civil character. It is also observed that the appropriate course available to the complainant, in the event of non-payment of the alleged amount, was to seek remedy before the competent civil forum for recovery. The simultaneous invocation of criminal proceedings in a piecemeal manner, without disclosing the complete transaction at the outset, reflects an attempt to exert undue pressure upon the petitioner. Such conduct cannot be tolerated, as it erodes the sanctity of criminal law and diverts it from its intended purpose.

11. For what has been discussed above, it becomes evident that the subsequent FIRs, being Crime No.131/2025 and Crime No.322/2025, are not based on any independent or distinct cause of action but are merely an extension of the allegations already incorporated in the first FIR bearing Crime No.190/2025. The continuation of these proceedings would, therefore, amount to duplication of process and misuse of the machinery of law. The proper course, in such circumstances, would be to treat the entire transaction as one composite case, allowing the investigating agency or the trial Court to consider all relevant material within the framework of the first FIR. Accordingly, while safeguarding the right of the complainant to pursue lawful remedies available under the civil law, it is deemed appropriate that the subsequent FIRs and proceedings arising therefrom be not allowed to continue independently. The investigating agency, if so required, may incorporate all relevant facts pertaining to the dishonoured cheques

through a supplementary report in the first FIR, enabling the competent Court to adjudicate the matter comprehensively and in accordance with law. This approach would not only prevent abuse of process but would also ensure consistency in adjudication, avoid conflicting findings and uphold the principles of justice, equity and fair play. Consequently, under peculiar circumstances the FIRs, being Crime No.131/2025 and Crime No.322/2025, as well as culminating criminal proceedings arising out of these FIRs are hereby quashed.

12. The petition states disposed of in the above terms.

\*Abdullahchanna/PS\*