


18.07.2022

Mr. Shoukat Ali Yousafzai, Advocate for the appellant present.  
Preliminary arguments heard.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 19.10.2022.



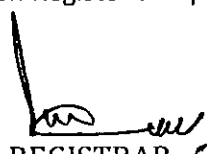


(Mian Muhammad)  
Member (E)

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 631/2022 \_\_\_\_\_

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	27/04/2022	<p>The appeal of Mr. Nasir Khan presented today by Mr. Shaukat Ali Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	17/5/22	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>13/5/22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p> CHAIRMAN</p>
	13.05 2022	<p>Learned counsel for the appellant present and requested for adjournment in order to further prepare the brief. Adjourned. To come up for preliminary hearing before the S.B on 18.07.2022.</p> <p> (Kalim Arshad Khan) Chairman</p>

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**  
**CHECK LIST**

Case Title: \_\_\_\_\_

S#	CONTENTS	YES	NO
1	This Appeal has been presented by <u>Shaukat Ali Advi</u>		
2	Whether counsel / appellant/ respondent/ deponent have signed the requisite document?	✓	
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 paged?	✓	
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 number 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 are 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 /documentations as required in the above table, have been fulfilled.

Name:- Shaukat Ali Advi

Signature:- [Signature]

Dated:- 22.4.2022

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In Re S.A 631 /2022

Nasir Khan

**VERSUS**

Government of Khyber Pakhtunkhwa and Others

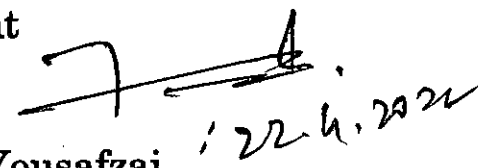
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Dated: 21/04/2022

Appellant

Through  
Shaukat Ali Yousafzai  
Advocate Peshawar High  
Court

  
22.4.2022

①

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In S.A \_\_\_\_\_/2022

Nasir Khan (Sweeper) S/o Raza Khan R/o Wazir Bagh  
Road, Mohallah Rasheedabad, Toheed Garghi, Peshawar

-----Appellant

**VERSUS**

1. Director Elementary & Secondary Education, Khyber  
Pakhtunkhwa, Peshawar
2. District Education Officer, (Female) Peshawar

-----Respondents

**APPEAL U/S 4 OF THE KHYBER  
PAKHTUNKHWA SERVICES TRIBUNAL ACT  
-1974 AGAINST THE IMPUGNED ~~REMOVED~~  
ORDER No. 4454-60 DATED 24-03-2022  
ISSUED BY THE OFFICE OF THE DISTRICT  
EDUCATION OFFICER (FEMALE)  
PESHAWAR, WHEREBY THE APPELLANT  
WAS ~~REMOVED~~ FROM SERVICE AND HIS  
DEPARTMENTAL APPEAL WAS TURNED  
DOWN VIDE ORDER No. 6307/F.NO./A-20/C-  
IV/NASIR KHAN SWEEPER DATED 06-04-  
2022 IN A CLASSICALLY CURSORY AND  
WHIMSICAL MANNER.**

**Respectfully Sheweth,**

1. That the Appellant is a bona-fide citizen of Islamic  
Republic of Pakistan and hails from a respectable  
family.

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2. That after going through the mandatorily required criteria, the Appellant got onto the rolls of the Respondent Department years back.
3. That since induction into service and after getting onto the rolls of this extremely humane and prestigious Department, the Appellant has remained the most pragmatic, devoted and dutiful fellow, who never left any stone unturned in performance of his duties and importing any responsibility that has been entrusted to the Appellant.
4. That it was in the backdrop of November 2021 that a complaint/FIR was registered by Mst. Kalsoom Bibi w/o Ijaz Hussain bearing FIR No. 1604 dated 12-11-2021 U/S 377-B PPC and 53 CPA at Police Station Agha Meer Jani Shah Peshawar against one Mr. Mian Arshad s/o Mian Khadim Shah for involvement in sexual abuse / immoral activities at Government Girls High School Qassab Khana, Peshawar. **(Copy of FIR is annexed herewith as annexure "A")**
5. That thereafter the District Education Officer (female) Mr. Abdul Saeed Principal of Govt. Shaheed Syed Afaq Ahmed High School No. 3, Peshawar Cantt and Mst. Bibi Tasleem Principal of Govt. Girls High School, Quid abad, Peshawar were appointed as inquiry officers with strict instructions to conduct inquiry regarding the above-mentioned FIR. Incident, which was accordingly carried out.

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6. That in consequence to the inquiry conducted by the inquiry officers the service of the Appellant was suspended from the rolls of Respondent Department vide Office Order No. 362-67 Dated 01-01-2022 on the alleged ground of his involvement in immoral activities at Government Girls High School Qassab Khana which is against the facts and circumstances as the name of the Appellant was not mentioned anywhere in the said FIR. **(Copy of suspension order is annexed herewith as annexure "B")**.
7. That there after the charge sheet and statement of allegation dated 01-01-2022 was issued to the Appellant without any reason along with immoral activities which is why he was charged in the FIR No. 1604 dated 12-11-2021 U/S 377-B PPC and 53 CPA at Police Station Agha Meer Jani Shah Peshawar. **(Copies of charge sheet and statement of allegation are annexed herewith as annexure "C" & "D")**.
8. That the appellant move several application to the response of charge sheet to the officers of inquiry Commission, conducted by the Office of District Education Officer (Female) Peshawar but no response from the inquiry officers and futile. **(Copy of response to the charge sheet application is annexed as annexure "E")**

9. That eventually the Appellant was ~~removed~~ from the rolls of the respondent department vide impugned Office Notification No. 4454-60/Special File/GGHS Qassab Khana dated 24-03-2022 without conducting proper inquiry against the Appellant, on a plea that complaints have been received against the Appellant from most of the school girls at Government Girls High School Qassab Khana, Peshawar which were fake, wrong and fabricated. **(Copy of impugned Office Notification dated 24-03-2022 is annexed herewith as annexure "F")**
10. That soon after receiving the charge sheet, and statement of allegation, the Appellant preferred a Departmental Appeal Dated 28-03-2022 for his reinstatement into service but there was no light to the end of the tunnel and the Departmental Appeal of the Appellant was turned down vide Office Order No. 6307/ F.No./A-21/C/IV/ Nasir Khan Sweeper Dated 06-04-2022. **(Copies of Departmental Appeal and impugned Office Order Dated 06-04-2022 are annexed herewith as annexure "G" & "H")**
11. That no proper show cause or final show cause notice was ever issued to the Appellant, nor he was personally heard or given the opportunity to explain himself.
12. That feeling aggrieved from the supra-mentioned episode, the grievances, that come into existence,



(5)

having no other adequate remedy available elsewhere, and forum to be addressed at, the Appellant approaches this Hon'ble Tribunal for his re-instatement into service, upon the following grounds, inter-alia;

**Grounds:**

- A. That the impugned ~~removal~~ Notification is wrong, illegal, unlawful, void-ab-initio and is not sustainable at all.
- B. That all the impugned notification is unwarranted, illogical and against the Rules so therefore not tenable in the eyes of law.
- C. That no proper inquiry was ever conducted in case of the Appellant, nor the Appellant was ever heard in person, thus the appellant was condemned unheard which is illegal, unlawful, which is not justified in any canon of law.
- D. That the name of the Appellant was not mentioned in the above-mentioned FIR nor he was ever involved in immoral activities.
- E. That, there is no proof / written record of the complaints made by the school girls against the Appellant and plea taken by the Respondent

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department is completely fake, fabricated and based on assumptions.

F. That even the departmental appeal of the appellant was turned down on, regardless of looking into the facts and was dismissed from the service.

G. That the appellant has served the respondent department for a couple of years and that too unblemished, without any complaint ever against, on part of the Appellant.

H. That from every angle the Appellant is liable to be re-instated into service with all back benefits.

I. That any other ground not raised here may graciously be allowed to be raised at the time of arguments.

*It is, therefore, most humbly prayed that on acceptance of the instant appeal, the impugned Office Notification No. 4454-60/Special File GGHS Qassab Khana, Dated 24-03-2022 of the office of District Education Officer (Female), Peshawar, whereby the Appellant was ~~removed~~ from Service, and the Departmental Appeal of the Appellant was turned down vide the Impugned Office Order No. 6307/F.No./A-20/C-IV/Nasir Khan Sweeper Dated 06-04-2022 of the Office of Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar*

(7)

*may very graciously be set-aside and by doing so the Appellant may very graciously be re-instated into Service with all back benefits.*

*Any other relief not specifically asked for may also graciously be extended in favor of the appellant in the circumstances of the case.*

Dated: 20-04-2022

*NAK*  
Appellant

Through *7*  
Shaukat Ali Yousafzai  
Advocate Peshawar High  
Court *22.4.22*

NOTE:-

No such like appeal for the same appellant, upon the same subject matter has earlier been filed by me, prior to the instant one, before this Hon'ble Tribunal.

*7A*  
Advocate *22.4.22*

(8)

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In Re S.A \_\_\_\_\_/2022

Nasir Khan

**VERSUS**

Government of Khyber Pakhtunkhwa and Others

**AFFIDAVIT**

I, Nasir Khan (Sweeper) S/o Raza Khan R/o Wazir Bagh Road, Mohallah Rasheedabad, Toheed Garghi, Peshawar, Peshawar do hereby solemnly affirm and declare that all the contents of the accompanied appeals true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

DEPONENT *AKS*

CNIC# 17301-9496280-3

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**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In Re S.A \_\_\_\_\_/2022

Nasir Khan

**VERSUS**

Government of Khyber Pakhtunkhwa and Others

**ADDRESSES OF PARTIES**

**APPELLANT.**

Nasir Khan (Sweeper) S/o Raza Khan R/o Wazir Bagh  
Road, Mohallah Rasheedabad, Toheed Garghi, Peshawar

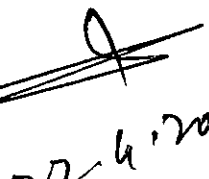
**RESPONDENTS:**

1. Director Elementary & Secondary Education, Khyber  
Pakhtunkhwa, Peshawar
2. District Education Officer, (Female) Peshawar

Dated: 21/04/2022

  
Appellant

Through  
Shaukat Ali Yousafzai  
Advocate Peshawar High  
Court

  
22.4.2022

21

پولیس نمبر: 2871970-1 / 1730-1  
مدرسہ: H.I. / 11  
تاریخ: 22 فورے 1989

تاریخ نمبر: 23-12  
16-3  
10-97  
5. 541

ابتدائی اطلاعی رپورٹ

آبدائی اطلاع نسبت جرم کامل دست اندازی پولیس رپورٹ شدہ زیر دفعہ 154 جوعہ منسلک جہاد

محل: گنجا اور  
تاریخ: 16/11/89  
مقام: 06/12/89

نام و کنیت اطلاع دہندہ	نام و کنیت جرم (معدومہ) مال اگر ہو گیا یا نہیں - الزامی
مخبر کیفیت جرم	376
مقام و کنیت جرم	376 طرح: 25/11/89
کارروائی و نتیجہ کی اطلاع	مقام: 376 B - 53 CPA تاریخ: 25/11/89
تعمیر سے روزگی کی تاریخ و وقت	16/11/89

ابتدائی اطلاع کے درج کردہ بتدوین میں مذکورہ ایجنسی کے رپورٹ کے تحت یہ اطلاع ہے کہ...

یہ اطلاع 16/11/89 کو 06/12/89 کو...

مقام: 376 B - 53 CPA

تاریخ: 25/11/89

تعمیر سے روزگی کی تاریخ و وقت  
16/11/89

14

Annexure "B"

64



OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR. Email I.D. emispeshawar@gmail.com

SUSPENSION:

Consequent upon the report of Inquiry Officer vide letter No. 1902 Dated. 29.11.2021 regarding FIR lodged against Mr. Mian Arshad Khan S/O Mian Khadim Shah Naib Qasid of Govt. Girls High School Qasab Khana Peshawar under section PPC-377-B- 53 CPA dated. 12.11.2021.

(Mr. Nasir- Sweeper of Govt. Girls High School Qasab Khana Peshawar is hereby suspended due to Involment in illegal/immoral activities from service w.e. from the date of FIR till further orders.

Note:-

1. Necessary entry should be made in his service book.
2. Allowed suspension allowance if not absconder.
3. Services of the above is hereby place at the disposal of this office

(SAMINA GHANI)  
District Education Officer  
(Female) Peshawar

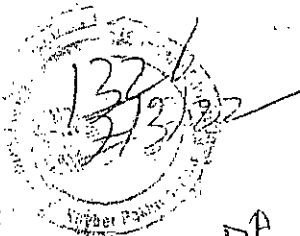
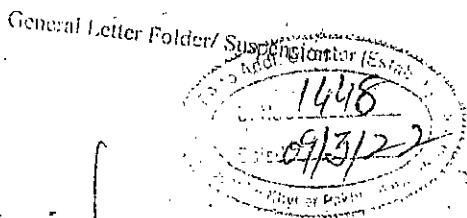
Endst No. 369-67 / FIR-Mian Arshad Khan / Dated. 01/01/2022.

Copy forwarded to the:-

- 1- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2- P.S to Sectary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3- P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 4- Inquiry Officers
- 5- Headmistress, Govt. Girls High School Qasab Khana Peshawar with the direction to direct the official concerned to report to this office
- 6- Master File.
- 7- MDO

Dy: District Education Officer  
(Female) Peshawar

C-IV Transfer Case



Handwritten signature and D.O.F

Handwritten date: 09/3/2022

Handwritten text: B-17

(18)

Annexure = "C"  
(62)



**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR. Email I.D. emisfpeshawar@gmail.com.**

## CHARGE SHEET.

1. Samina Ghani DEO (F) Peshawar as competent authority hereby charge you Mr. Nasir, Sweeper of GGHS Qasab Khana Peshawar as follow:

That you while posted as Sweeper, of GGHS Qasab Khana Peshawar, committed the following irregularities: -

1. You are involved in the illegal activities.
2. In the light of students written statements, you have characterless attitude and involve in immoral activities in the premises of school.
2. By Reason of the above, you appear inefficient & guilty of misconduct under rule 3 of the Khyber Pakhtunkhwa Government servant (Efficiency and Discipline) Rules 2011 and have rendered yourself liable to all or any of the penalties specified in Rule 4 of the rules ibid.
3. You are therefore, required to submit your written defense within seven days of the receipt of this Charge Sheet to the inquiry officer / inquiry committee, as the case may be.
4. Your written defense, if any, should reach the inquiry officer / inquiry committee 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 be taken against you.
5. Intimate whether you desire to be heard in person.
6. A statement of allegation is enclosed.

*S. Ghani*  
01/01/2022  
District Education Officer  
(Female) Peshawar





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Annexure - 17

**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR. Email I.D. emisfpeshawar@gmail.com**

## DISCIPLINARY ACTION.

1. Samina Ghani DEO (F) Peshawar as competent authority, am of the opinion that Mr. Nasir, Sweeper GGHS Qasab Khana Peshawar, has rendered himself liable to be proceeded against, as he committed the following act/omission, within the meaning of rule-3 of the Khyber Pakhtunkhwa Government servant (Efficiency & Discipline) Rules, 2011:-

### STATEMENT OF ALLEGATION.

- 1- You are involved in the illegal activities.
- 2- In the light of students written statements, you have characterless attitude and involve in immoral activities in the premises of school.
2. For the purpose of inquiry against the said accused with reference to the above allegations, an formal inquiry officer / inquiry committee, consisting of the following, is constituted under rule 10(1)(a) of the ibid rules.
  - I. Mst. Farzana Lal Sher, Principal, GGHS Qasab Khana Peshawar.
  - II. Mr. Ehteram Khan, Principal, GHSS Urmar Bala, Peshawar
3. The Inquiry Officer / inquiry committee shall, in accordance with the provision of the ibid rules, provide reasonable opportunity of hearing to the accused, record its finding and make, within thirty days of the receipt of this order, recommendations as to punishment or order appropriate action against the accused.
4. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer / inquiry committee.

Mr. Nasir, Sweeper  
Office of the Headmistress,  
GGHS Qasab Khana, Peshawar

*S. J. Khan*  
01/01/2022  
District Education Officer  
(Female) Peshawar

(124)

Date: No 2 - 2594  
DEO (F) 10/11/2022

To

The inquiry officers

1. Madam Farzana Lal Sher Principal GGHS Chamkani
2. Ihteram Khan Principal GHSS Urmar Bala Pesh

Annexure 1

Subject: Response to the Charge Sheet

Sir/ Madam,

With due respect, following are my responses to the charge sheet issued by DEO (F) Peshawar vide letter No -372 dated 1-1-2022 received by me on 05-1-2022.

1. I have never been involved in any illegal activities. Rather I performed my duties with hard work and diligence.
2. I have never been involved in any immoral activities in the premises of school and the students have not given any statement against me.
3. I am willing to be heard in person so that the misunderstanding should be removed.
4. The allegations levied against me are not true and are against the facts. So it is requested to complete the inquiry with fulfillment of standard of justice.

Gf y for Information  
DEO (F) Peshawar

Yours obediently

NAS  
10/11/2022

Nasir Khan

Sweeper

Under suspension

GGHS Qasab Khana

Peshawar



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Annexure "F"

**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR. Email ID.emisfpeshawar@gmail.com**

**NOTIFICATION:**

1. **WHEREAS** the Principal Govt. Girls High School Qasab Khana Peshawar has reported that Mr. Mian Arshad S/O Mian Khadim Shah Naib Qasid of GGHS Qasab Khana Peshawar has been arrested by the police on the report / FIR lodged by Mst. Hira Batool Student of class-7<sup>th</sup> vide No Nil dated 13.11.2021.
2. **AND WHEREAS** Mr. Abdul Saeed, Principal, Govt. Shaheed Syed Afaq Ahmad High School No.3 Peshawar Cantt and Mst. Bibi Tasleem Headmistress Govt. Girls High School Quaid Abad Peshawar were appointed as inquiry officers vide this office notification No. 859-63 dated. 13.01.2022 to inquire against the above named official who is involved immoral activities as per FIR and to submit detail report into the matter.
3. **AND WHEREAS** the enquiry Officers has submitted enquiry report vide No. 10021 dated 29.11.2021, received to this office diary No. 1690 dated. 02.12.2021. The enquiry officers have pointed out that Mr. Nasir Sweeper Govt. Girls High School Qasab Kana Peshawar attitude is characterless as per written complaint from most of the school girl's students of Govt. Girls High School Qasab Khana Peshawar and recommended for Removal from Service.
4. **AND WHEREAS** Another formal inquiry was conducted by Mst. Farzana Lal Sher Principal Govt. Girls Higher Secondary School Chmakani & Mr. Ehteram Khan Principal Govt. Higher Secondary School Umar Bala Peshawar with the direction to submit documentary proofs / clear cut recommendations vide this office Endst No. 30-34 dated. 28.12.2021.
5. **AND WHEREAS** He was proceeded against under Khyber Pakhtunkhwa Govt. Servant rules 2011 for the charge leveled by the inquiry officers in their inquiry report and was suspended vide this office Endst No 362-67 dated. 01.01.2022.
6. **AND WHEREAS** Charge Sheet was issued to the above named official through Headmistress vide this office Endst No. 372 dated. 01.01.2022.
7. **AND WHEREAS** Another Inquiry committee has submitted that Mr. Nasir, Sweeper Govt. Girls High School Qasab Khana Peshawar is not fit to be kept as sweeper after such reports about his characterless nature. He may be removed from service for having bad eyes on the girl's students in the school.
8. **AND WHEREAS** a reply in response of charge sheet received from the official concerned vide Diary No. 2594 Dated: 10.01.2022, which was found unsatisfactory.
9. **AND WHEREAS** The competent authority, District Education Officer (Female) Peshawar, after having considered the charges, evidence on record, and facts of the case, of the view that the charge of misconduct / Negligence in duty against the accused has been proved.
10. **NOW THEREFORE**, in exercise of the powers under Rules-4(b)iii of Khyber Pakhtunkhwa Government Servants(Efficiency and Discipline Rules 2011, I, Samina Ghani, District Education Officer (Female) Peshawar is pleased to impose major Penalty of "Removal from Service" upon Mr. Nasir Sweeper Govt. Girls High School Qasab Khana Peshawar with immediate effect.

(SAMINA GHANI)  
District Education Officer,  
(Female) Peshawar.

Endst. No. 4454-60/Special File GGHS Qasab Khana / Dated: 24 /03/2022

Copy of the above is forwarded to the:-

- 1- Accountant General Khyber Pakhtunkhwa Peshawar.
- 2- Deputy Commissioner Peshawar.
- 3- Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- 4- PS to Secretary, (E&SE) Khyber Pakhtunkhwa, Peshawar.
- 5- District Monitoring Officer (EMA) Peshawar.
- 6- Head Mistress GGHS Qasab Khana Peshawar with the remarks to recover any over payment made to the above named Official and deposit in to Govt. Treasury under intimation to this Office.
- 7- Official concerned.

District Education Officer,  
(Female) Peshawar





(17)

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

No. 6307 /F.No. /A-20/C-IV/Nasir Khan Sweeper

Dated Peshawar the 06/04 /2022

Phone: 091-9225344

Email: ddadm.e@gmail.com

To

The District Education Officer,  
(Female) Peshawar.

Annexure = "H"

Subject: **APPEAL**

I am directed to refer to the subject cited above and to state that in Appeals r/o Nasir Khan Sweeper GGHS Qasab Khana Peshawar has been examined/analyzed by this office hence, inform the appellant concerned that have appeals has been rejected by the appellate authority.

*Sd/-*  
**Assistant Director (Admn)**  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst; No. 6307

Copy forwarded to the: -

1. Nasir Khan Sweeper GGHS Qasab Khana Peshawar
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

*Sd/-*  
**Assistant Director (Admn)**  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

It is stated that a appeal  
was made for reinstatement in y/o Nasir Khan  
Khakroob GGHs Basab Khanq Peshawar. He  
wants reinstatement in same Khakroob  
Post.

If agreed the case may be sent to DFO Female  
for comments / detail report at an early date.  
Submitted for your perusal and further order.

Ad Admn: P-1-2/N

B  
28/3/22

may be sent to detail report / comments of  
Proposed & also Comit decision pl.

DD(F&A)

SR  
28/3/22

Para 2 of agree to DFO Comd may  
be asked to send report plus  
Addl D/2 CPBS,

PS  
29-3-22

If agreed his appeal  
may be rejected.

SR  
31/3/22

19

63



**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) PESHAWAR. Email I.D. emisfpeshawar@gmail.com**

No. 378 / SPI GGHS Qasab Khana Dated Peshawar the: 01 /01/2022

To:   
✓ The Inch: Headmistress  
G.G.H.S Qasab Khana  
Peshawar

Subject: CHARGE SHEET

Memo:




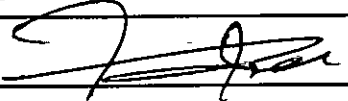
I am to refer to the Subject noted above and to ask you to serve enclosed charge sheet upon Mr. Nasir Sweeper, GGHS Qasab Khana Peshawar and submit a copy of receipt thereof as a token to this office for record.

*Asif*  
Dy: District Education Officer  
(Female) Peshawar.

Enclst No. \_\_\_\_\_  
Copy of the above is forwarded to the:-

1. P.S to Sectary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Inquiry Officer
4. Master file.

*SA*  
Dy: District Education Officer  
(Female) Peshawar.

قیمت 50 روپے	122098			
ایڈوکیٹ: 		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: bc-10-22-20				
رابطہ نمبر: 99333-9039106				

بعدالت جناب: صمیم ضعیف دکتو مختونخواہ سرواں سر پور کھانہ

منجانب: <u>عزت / سردار</u>	دعوی:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
	<b>باعت تحریر آگے</b>

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی منظور کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز ذیل صاحب کو راضی نامہ کہنے اور تقررات و فیصلہ برحلف دینے جو جواب دعوی اقبال دعوی اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا ایبل کی برآمدگی اور ہرجوئی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ مانتے ہوئے نظر رکھا اختیار ہوگا اور صاحب مقرر شدہ کو کوئی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا سختہ پر دستخط منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سندر ہے

صمیم ضعیف

AKS

المقام: 22-11-2022

الع: 22-11-2022

مقام: 22-11-2022

باعت تحریر آگے منظور ہے۔

باعت تحریر آگے منظور ہے۔

باعت تحریر آگے منظور ہے۔

باعت تحریر آگے منظور ہے۔

باعت تحریر آگے منظور ہے۔