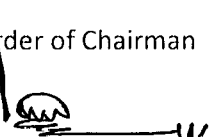


Form- A

## FORM OF ORDER SHEET

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

Case No.- 1221/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/08/2022	<p>The appeal of Mst. Nabeela presented today by Mr. Sabir Shah Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____. Notices be issued to appellant and her counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

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

Service Appeal No. 1221 of 2022

Mst. Nabeela

... Appellant

**VERSUS**

Government of KP and others.

... Respondents

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4.	Memo Of Addresses	.....	7
5.	Copies of CNIC, Arrival report, order dated 17-09-2018 and Order dated 31.10.2016	A	8-23
6.	Copies of inquiry proceedings	B	24-31
7.	Copies of F.I.R, inquiry proceedings & order dated 24.02.2022	C	32-50
8.	Copy of order dated 24.02.2022	D	51-52
9.	Copies of memo of representation dated 12.05.2022 and receipt of courier service	E	53-55
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11.	Wakalat Nama	.....	66

APPELLANT

Through Counsel



**SABIR SHAH**

Advocate Supreme Court of Pakistan

Off: S.8,9 2<sup>nd</sup> Floor, Continental Plaza,

Makanbagh, Mingora, District Swat.

Cell No: 03005746744

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

Service Appeal No. 1221 of 2022

Mst. Nabceela W/O Adalat Khan (Ex- Family Welfare Assistant)

R/O Village Jambil Kokarai, Tehsil Babozai, Distt: Swat.

... Appellant

**VERSUS**

1. The Director General, Population Welfare Department, Government of Khyber Pakhtunkhwa.
2. District Population Welfare Officer Saidu Sharif, Swat.
3. Government of Khyber Pakhtunkhwa through Secretary Population Welfare Department at A-Block Abdul Wali Khan Multiples Civil Secretariat, Peshawar.

... Respondents

Service Appeal under Section 4 of Service Tribunal Act, 1974, against the order No. F.No.1 (17)/admn/2020-21/4398/403 dated Swat, the 24/02/2022, whereby the appellant has been removed from service by way of major penalty.

**Prayer:**

On acceptance of this service appeal, the order No. F.No.1 (17)/admn/2020-21/4398/403 dated Swat, dated 24/02/2022, may kindly be struck down and the appellant may kindly be re-instated with all back benefits.

Any other relief not specifically prayed but this august court deems proper may also be granted.

Respectfully Sheweth:

1. That appellant is the bonafide resident of Village Jambil, Kokarai Tehsil Babozai, District Swat and was initially appointed as Family Welfare Assistant

(project post) vide order dated 31.10.2016 and after promulgation of the Khyber Pakhtunkhwa Regularization Act, 2018, her services were regularized vide order dated 17-09-2018. (Copies of CNIC, Order dated 31.10.2016, Arrival report and order dated 17-09-2018, are annexed as **ANNEXURE "A"**)

2. That appellant was serving on the subject post with zeal and zest, to the best of her abilities and to the satisfaction of her high-ups at family welfare Centre jambil.
3. That in the year 2021, the appellant suffered from COVID-19 therefore absented from her duties w.e.f 03/04/2021 to 30/04/2021 and an inquiry was initiated against her, which was culminated in to minor punishment for **"stoppage of one annual increment for two years"** (Copies of inquiry proceedings are annexed as **ANNEXURE "B"**)
4. That brother in law of the appellant got involved in a criminal case u/s 295-B of Pakistan Penal Code dated 17/08/2021 P.S Kokarai, Distt Swat, as the allegations were very sever and shocking, therefore due to public threats, the appellant along with other family members moved to Karachi, so appellant was once again absented from her duties with unwilling heart and again an inquiry was initiated against the appellant in last of 2021, wherein the appellant due to special circumstances of the aforementioned criminal case couldn't appear before the inquiry officer and the inquiry was proceeded ex-parte against the appellant. It is pertinent to mention herein that after conclusion of the ex-parte inquiry she was removed from service vide impugned order dated 24-02-2022. (Copies of F.I.R, inquiry proceedings & order dated 24.02.2022 are annexed as **ANNEXURE "C"**)
5. That the appellant when came to her abode, inquired about her service from the local official of the department, she was informed that her services have been terminated, therefore she appeared before the respondent No.2 on 28/04/2022, to know about her status of service, wherefrom she got copy of the impugned order dated 24/02/2022. (Copy of order dated 24.02.2022 is annexed as **ANNEXURE "D"**)

6. That the appellant preferred a departmental appeal before the worthy respondent No.1 on 12.05.2022 (well within time as the appellant got copy of the impugned order on 28/04/2022) which has not been responded in its statutory period, therefore the appellant having no other option but to file the instant appeal in its statutory time limitation on the following grounds: (Copies of memo of representation dated 12.05.2022 and receipt of courier service are annexed as **ANNEXURE "E"**)

**Grounds:**


- i. That, actions and inactions of respondents are illegal, ultra vires, ultra Shariah and against the established norms of administration, therefore, are not tenable in the eyes of law.
- ii. That, appellant has not been dealt with in accordance with law, which is the worst example of discrimination, therefore, is against the fundamental rights of the appellant, as enshrined in Articles 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- iii. That, appellant has been deprived of her legal right of service, safeguarded by constitution of Islamic republic of Pakistan, 1973.
- iv. That the appellant has neither been absented willfully, rather absentia was beyond her control, as her whole family was under sever threats of the locals of the area due to involvement of her brother in law in the criminal case U/S 295-B PPC and it was impossible for her to attend her due at the stake of her life.
- v. That punishment extended to the appellant is harsh one as per facts and circumstances of the case mentioned above, as the appellant time and again requested respondent No. through various applications the she may be transferred to another station or be granted leave but respondent No.1 neither allowed her leave request nor transferred her of the station wherein she and her family was under sever life threats. (Copies of applications are annexed as **ANNEXURE "F"**)

- vi. That the appellant is the sole bread earner of her family having a jobless husband and three siblings to maintain.
- vii. That inquiry proceeding have not been conducted in accordance with law and rules on the subject and the appellant has been condemned un-heard, which is against the golden principles of natural justice i.e “audi alterem partem”
- viii. Any other ground not specifically raised will be argued with the prior permission of this August Court.

In view of the above, it is therefore very humbly prayed that, on acceptance of this service appeal, the order No. F.No.1 (17)/admn/2020-21/4398/403 dated Swat, dated 24/02/2022, may kindly be struck down and the appellant may kindly be re-instated with all back benefits.

Any other relief not specifically prayed but this august court deems proper may also be granted.

APPELLANT  
Through Counsel



---

**SABIR SHAH**

Advocate Supreme Court of Pakistan

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

Service Appeal No. \_\_\_\_\_ of 2022

Mst. Nabeela

... Appellant

VERSUS

Government of KP and others.

... Respondents

**Certificate**

As per instructions received from my client, it is certified that no such like service appeal against the impugned orders, has been earlier filed before this Hon'ble Court.

APPELLANT  
Through Counsel



**SABIR SHAH**

Advocate Supreme Court of Pakistan

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

Service Appeal No. \_\_\_\_\_ of 2022

Mst. Nabeela

... Appellant

VERSUS

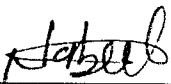
Government of KP and others.

... Respondents

**Affidavit**


I, Nabeela w/o Adalat Khan, R/o Jambil, Kokarai, Tehsil Babozia, District Swat, do hereby solemnly affirm and declares on oath that, all the contents of the accompanying **service appeal** are true and correct to the best of my knowledge and belief and nothing has been kept concealed or withheld from this Hon'ble court.

Deponent

  
\_\_\_\_\_

Nabeela  
CNIC No. 15602-9903665-4

Identified By:

  
\_\_\_\_\_  
Sabir Shah  
Advocate Supreme Court of Pakistan





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

Service Appeal No. \_\_\_\_\_ of 2022

Mst. Nabeela

... Appellant

VERSUS

Government of KP and others.

.... Respondents

**MEMO OF ADDRESSES**

**Address of Appellant:**

Mst. Nabeela W/O Adalat Khan R/O Village Jambil Kokarai, Tehsil Babozai, Distt: Swat

CNIC No: 15602-9903665-4

Cell No. 03419750043/03493945544

**Addresses of Respondents:**

1. The Director General, Population Welfare Department, Government of Khyber Pakhtunkhwa.
2. District Population Welfare Officer Saidu Sharif, Swat.
3. Government of Khyber Pakhtunkhwa through Secretary Population Welfare Department at A-Block Abdul Wali Khan Multiples Civil Secretariat, Peshawar.

APPELLANT

Through Counsel



**SABIR SHAH**

Advocate Supreme Court of Pakistan

12/09/1996

15602-9903665-4

ANN BERRY





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NABELA

Family Welfare

Assistant (I)



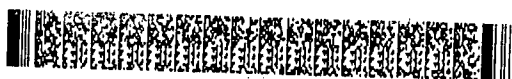
Handwritten notes in Urdu, including a circled 'B'.

**Name:** [Redacted]  
**Signature:** Muhammad Saad  
**Designation:** Family Welfare Asstt. (F)  
**IC #: 15602-9903665-4**  
**Address:** VII, Jamali, Tehsil Babozai,  
District Swat.

شناختی نمبر: 15602-9903665-4  
نام: TB4V33  
موجودہ پتہ: جامیل، ڈاکخانہ کوکارتی، تحصیل بابوزئی، ضلع سوات

مستقل پتہ: ایضاً

تاریخ اجراء: 22/02/2015  
تاریخ ترمیم: 22/02/2025  
گمشدہ کارڈ ملنے پر قریبی ایئر بس میں ڈال دیں





(10)

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
POPULATION WELFARE DEPARTMENT**

A-Block Abdul Wali Khan Multiplex,

Civil Secretariat, Peshawar.

Ph: 9223623, Fax: 9223622

Dated Peshawar the, 17<sup>th</sup> September, 2018

## NOTIFICATION

**NO.SOE(PWD)4-67/Regularization/2018:-** In pursuance of Khyber Pakhtunkhwa Employees (regularization of Services) Act, 2018, the Provincial Government is pleased to regularize the services of the following Project employees of the Project titled "**Establishment of 100 FWCs in Khyber Pakhtunkhwa**" who were holding projects posts at the commencement of the act ibid w.e.f 07<sup>th</sup> March, 2018, as provided under section-4 of the ibid Act:-

S# In The Schedule Of The Act	DETAILS OF THE PROJECT EMPLOYEES			
	S#	NAME	DESIGNATION	BPS
47	1	Sonila Zaffer D.O Mohammad Zaffer Sultan	FWW	BPS-09
	2	Nargis Bibi D/O Mehboob Khan	FWW	BPS-09
	3	Muqadisa Khan D/O Mohd: Hanif	FWW	BPS-09
	4	Hajra Zaman D/O Sardar Aurangzeb	FWW	BPS-09
	5	Sania Iqbal D/O Iqbal Khan	FWW	BPS-09
	6	Ayesha Bibi D/O Muhammad Shafique	FWW	BPS-09
	7	Robina Zahir D/O Zahir Shah	FWW	BPS-09
	8	Ambreen D/O Mairaj Khan	FWW	BPS-09
	9	Shandana Bibi d/o Muhammad Farhat Ullah Khan	FWW	BPS-09
	10	FAREEDA BIBI D/O GUL	FWW	BPS-09
	11	Bushra Begum D.O Habib Khan	FWW	BPS-09
	12	Basira Bibi D/O Khurshid Afrin	FWW	BPS-09
	13	Omima Bibi D/O Habib Khan	FWW	BPS-09
	14	Neelma Rani D/O Mukhtar Ali	FWW	BPS-09
	15	Munaza D/O Ghulam Haider	FWW	BPS-09
	16	Nazra Begum D/O Shah Fayaz Khan	FWW	BPS-09
	17	Arifa Batool D/O Mohd: Yaqoob Khan	FWW	BPS-09
	18	Khalida Nazir D/o Zahoor Rehman	FWW	BPS-09
	19	Uzma D/O Abdul Ghafor	FWW	BPS-09
	20	Asma Bibi D/O Inayatullah Khan	FWW	BPS-09
	21	Palwasha D/O Salar Muhammad	FWW	BPS-09

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22	Miss. Khadija Bibi D/o Ghulam Karim.	FWW	BPS-09
23	Miss. Shabina Bibi W/o Gul Nawab	FWW	BPS-09
24	Faiza Riaz D/O Muhammad Riaz	FWW	BPS-09
25	Shama D/O Salar Muhammad	FWW	BPS-09
26	Noorin Ali D/O Ali Muhammad	FWW	BPS-09
27	Sehrish D/O Abdullah Khan	FWW	BPS-09
28	Asma Bibi D.O Moh, Maskin	FWW	BPS-09
29	Nayab Bibi D/O Javied Khan	FWW	BPS-09
30	Alia Bibi D/o Tata Khan	FWW	BPS-09
31	Aneela Gul D/ O Anwar Khan	FWW	BPS-09
32	Bushra Manzar D/O Manzar Hussain	FWW	BPS-09
33	Rukhsana D/O Mumber Shah	FWW	BPS-09
34	Rida Gul D/O Fazal Gul	FWW	BPS-09
35	Sahira Naz D/o Tajmal Kahn	FWW	BPS-09
36	Salma Khattak D/O Syed Badshah	FWW	BPS-09
37	Miss. Aini D/o Ishar Das	FWW	BPS-09
38	Zainab Bibi D/o Muhammad Yaqoob	FWW	BPS-09
39	Miss. Stoorai D/o Mian Sahib Gul	FWW	BPS-09
40	Miss. Heema Komari D/o Gur Baksh Sing	FWW	BPS-09
41	Faiza d/o Abdul Rauf	FWW	BPS-09
42	Saman Rabia D/O Allah Bakhsh	FWW	BPS-09
43	Parveen Malak D/O Malak Zada	FWW	BPS-09
44	Irum Bibi d/o Abdul Ghani	FWW	BPS-09
45	Hanan Mazhar D/o Mir Muhammad Mazhar	FWA(F)	BPS-07
46	Shehla Gul D.O Ashiq Hussain Shah	FWA(F)	BPS-07
47	Seemab Ayaz d/o Rehmat Ayaz khan	FWA(F)	BPS-07
48	Farzana D.O Rahim Gul	FWA(F)	BPS-07
49	Sobia Dawood W/o Zabih Ullah	FWA(F)	BPS-07
50	Mehnaz Hassan D/O Hassan Zaib	FWA(F)	BPS-07
51	Asia Bibi D/O Kin Syed	FWA(F)	BPS-07
52	Bibi Safeena Akhter D/O Akhter Zeb.	FWA(F)	BPS-07
53	Rehana Bibi d/o Hassan Zaib	FWA(F)	BPS-07
54	Nabia75 D/O Sher Azal	FWA(F)	BPS-07
55	Sumia D.O Amra Ali	FWA(F)	BPS-07
56	Shehla D/O Wazir Zada	FWA(F)	BPS-07
57	Fatima D/O Sher Afzal	FWA(F)	BPS-07
58	Hira Saddiq D.O Sadiq ullah	FWA(F)	BPS-07
59	Gul Ranga D/O Yousuf Khan	FWA(F)	BPS-07
60	Sumaira Naz D/O Tilla Muhammad	FWA(F)	BPS-07
61	Alishba Khan D/O Bashir Ahmad	FWA(F)	BPS-07
62	Mahjabeen D.O Mohammad Ramzan	FWA(F)	BPS-07

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63	Saima Gul W.O Masood ur Rehman	FWA(F)	BPS-07
64	Resham Shah D/o Sherali Shah	FWA(F)	BPS-07
65	Bibi Rohina D.O Habibur Rehman	FWA(F)	BPS-07
66	Wagma D/O Sayed Bahadar	FWA(F)	BPS-07
67	Salma Bibi D/O Gul Azeem Khan	FWA(F)	BPS-07
68	Nasrin Shadab D/O Gul Azim Khan	FWA(F)	BPS-07
69	Zeenat bibi d/o Multan shah	FWA(F)	BPS-07
70	Sehla Gul D/O Hayat Ur Reman	FWA(F)	BPS-07
71	Samia Naz D/O Hashmat Ullah Khan	FWA(F)	BPS-07
72	Sofia Sammar D/O Sardar Bahader	FWA(F)	BPS-07
73	Rabia Bibi D/O Rustam Khan	FWA(F)	BPS-07
74	Mussrat Yasmeen D.O Ali Husain	FWA(F)	BPS-07
75	Pir Zad begam D/O Qanoon Badshah	FWA(F)	BPS-07
76	Kainat Akhtar W/O Saleem Shah	FWA(F)	BPS-07
77	Nazia Shaheen D/O Bahadur Jang	FWA(F)	BPS-07
78	Shawana Rehman D/O Saif Ur Rehman	FWA(F)	BPS-07
79	Hameeda Bibi D/O Muhammad Asmatullah	FWA(F)	BPS-07
80	Naseema Bibi d/o Mohammad Asmtullah	FWA(F)	BPS-07
81	Naz Begam W/O Noor Ul Hadi	FWA(F)	BPS-07
82	Jan Begam D/O Muhammad Aslam	FWA(F)	BPS-07
83	Halima Bibi w/o Hazrat Bilal	FWA(F)	BPS-07
84	Nazia Minhas D.O Umer Khan	FWA(F)	BPS-07
85	Amna Shah D/O Dewan Shah	FWA(F)	BPS-07
86	Usra Rahim D/O Aziz UR Rahim	FWA(F)	BPS-07
87	Zakia D/O Abdul Haleem	FWA(F)	BPS-07
88	Saba Gul D/o Wazir Khan	FWA(F)	BPS-07
89	Reshma Gul D.O Amir Zamin	FWA(F)	BPS-07
90	Nafeesa Zeb D/O Jehan Zeb Khan	FWA(F)	BPS-07
91	Madiha D/O Sultane Room	FWA(F)	BPS-07
92	Sadia Naz w/o Kamran Khalid	FWA(F)	BPS-07
93	Sidra w/o Sajad Ahmad	FWA(F)	BPS-07
94	Tabasumm Bibi D/O Badsha Khan	FWA(F)	BPS-07
95	Naseem Begum D/O Bunair Rehman	FWA(F)	BPS-07
96	Halima Naz D.O Waheed Rehman	FWA(F)	BPS-07
97	Sonia Tabasum D/O Aurangzeb	FWA(F)	BPS-07
98	Kaif ul Wara D.O Imran Ullah	FWA(F)	BPS-07
99	Nadia Wisal D/O Wisal Muhammad	FWA(F)	BPS-07
100	Bibi Salwa D/O Ali Muhammad	FWA(F)	BPS-07
101	Sapna Gul W/O Zawar Ali Shah	FWA(F)	BPS-07

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102	Shumaila D/O Abdul Manan	FWA(F)	BPS-07
103	Nazish D/O Irshad Ali	FWA(F)	BPS-07
104	Khair un Nisa d/o Sakin Ullah	FWA(F)	BPS-07
105	Aliya D/O Umar Daraz	FWA(F)	BPS-07
106	Sameena Naz d.o Jangrez khan	FWA(F)	BPS-07
107	Habiba Shoukat D/O Shoukat Ali	FWA(F)	BPS-07
108	Safia Hakim D.O Hakim Khan	FWA(F)	BPS-07
109	Lubna Bibi D/O Shah Jehan	FWA(F)	BPS-07
110	Khatmin D.O Aziz Ur Rehman	FWA(F)	BPS-07
111	Begum Bibi d/o Mir akbar	FWA(F)	BPS-07
112	Nighat Hasham D/O Muhammad Hashim	FWA(F)	BPS-07
113	Iqra Farhat D/O Afzal Shah	FWA(F)	BPS-07
114	Saima Hidayat D/O Hidayat Khan	FWA(F)	BPS-07
115	Shagufta Bibi D/O Sher.Ahmad	FWA(F)	BPS-07
116	Wahida Bibi d/o Awalnoor khan	FWA(F)	BPS-07.
117	Fauzia Begum W/O Shahid Ali	FWA(F)	BPS-07
118	Saima D/O Hidayat Ullah	FWA(F)	BPS-07
119	Saiqa Begum D/O Aqal Munir	FWA(F)	BPS-07
120	Rakhshanda naz d/o Zar Sher	FWA(F)	BPS-07
121	Nazma Ali d/o Shawat Ali	FWA(F)	BPS-07
122	Sadna bibi D/O Sher Ali	FWA(F)	BPS-07
123	Kaloom d/o Jehanzeb	FWA(F)	BPS-07
124	Salma D/O Liaqat Ali	FWA(F)	BPS-07
125	Shabana bibi D/O Fazal Ala	FWA(F)	BPS-07
126	<del>Nabeela D/O Muhammad Saeed</del>	FWA(F)	BPS-07
127	Seema Bibi D/O Tahir Khan	FWA(F)	BPS-07
128	Sumaira naz W/O Faiz ali shah	FWA(F)	BPS-07
129	Zeenat Bibi D/O Said Ghafoor	FWA(F)	BPS-07
130	Qurat ul Ain D/O Mehmod Khan	FWA(F)	BPS-07.
131	Zermeena D/O Gul Muhammad	FWA(F)	BPS-07
132	Shabana Bibi D/O Aurangzeb	FWA(F)	BPS-07
133	Kanwal shehzadi w/o inamullah	FWA(F)	BPS-07
134	Arsalan Irshad S/O Muhammad Irshad	FWA(M)	BPS-07
135	Faizan Malik S/O Malik Gulzar Khan	FWA(M)	BPS-07
136	Waleed-Ur-Rehman S/O Habib-Ur-Rehman	FWA(M)	BPS-07
137	Mohammad Ali Khan S/O Mohammad Javed Lodhi	FWA(M)	BPS-07
138	Mohammad Salah u Din S.O Aftab Ali Khan	FWA(M)	BPS-07

Nabeela w/o Adalat Khan  
 Sr. FWA-F.

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(14)

	Khan		
139	Noman Khan S/O Shah Daraz Khan	FWA(M)	BPS-07
140	Naveed S.O Zahid Ullah	FWA(M)	BPS-07
141	Ali Muhammad s/o Noor Muhammad	FWA(M)	BPS-07
142	Altaf Shah S/O Khai Rajdar Mian	FWA(M)	BPS-07
143	Faridullah S/O Usman Ghani	FWA(M)	BPS-07
144	Syed Moiz Ali Shah S/O Syed Abbas S	FWA(M)	BPS-07
145	Muhammad Ilyas S/O Afsar Ali Khan	FWA(M)	BPS-07
146	Ishfaq Husain S.O Bahader Khan	FWA(M)	BPS-07
147	Fazal Khaliq S/O Abdul Khaliq	FWA(M)	BPS-07
148	Syed Fakhre Alam S/O Syed Zahir Shah	FWA(M)	BPS-07
149	Zeeshan Gul S/O Mian Gul	FWA(M)	BPS-07
150	Mohsin Jehan S/O Shah Jehan	FWA(M)	BPS-07
151	Aftab Amir Shah S.O Amir badshah	FWA(M)	BPS-07
152	Amir Sohail S/O Mukhtiar Hussain	FWA(M)	BPS-07
153	Islamur Rahman S/O Khalifullah	FWA(M)	BPS-07
154	Mehib Ullah S.o Mohammad Ghulam	FWA(M)	BPS-07
155	Adnan Khan S/O Zara War Khan	FWA(M)	BPS-07
156	Muhammad Adeel s/o Muhammad Amin	FWA(M)	BPS-07
157	Khwaja Muhammad Khan S/O Rahman Ul Mulk	FWA(M)	BPS-07
158	Shakirullah s/o Habib ur Rehman	FWA(M)	BPS-07
159	Syed Ibrar Ahmad S/O Saeed Ahmad	FWA(M)	BPS-07
160	Muslim Khan S/O Abdul Jalil	FWA(M)	BPS-07
161	Mohammad Ishfaq S/O Saadullah Jan	FWA(M)	BPS-07
162	Rizwan Ahmad Khan S/o Muhammad Sadeeq	FWA(M)	BPS-07
163	Mubashir Ahmad S/O Gul Dali Khan	FWA(M)	BPS-07
164	Shakir ullah s/o Ameer Jahan	FWA(M)	BPS-07
165	Walid Islam S/o Awal Sher.	FWA(M)	BPS-07
166	Muhammad Faizan S/O Shah Hussain	FWA(M)	BPS-07
167	Mohammad Saifullah S.O Alamzeb	FWA(M)	BPS-07
168	Habib Ur Rehman S/O Daryish Khan	FWA(M)	BPS-07
169	Muhammad Fazil S/O Molvi Rafiullah	FWA(M)	BPS-07
170	Hafeez Ul Haq S/O Alam Sher Khan	FWA(M)	BPS-07
171	Muhammad Mubeen S/O Daleel Khan	FWA(M)	BPS-07
172	Fazal Rabbi S/O Seraj	FWA(M)	BPS-07
173	Imdad Ullah S/O Yar Baig	FWA(M)	BPS-07
174	Rafi Ullah s/o Naimat Ullah	FWA(M)	BPS-07
175	Mumtaz Khan S/O Ghulam Jan	FWA(M)	BPS-07

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176	Wasim Akram S/O Abdul Qayyum	FWA(M)	BPS-07
177	Shams-Uz-Zaman S/O Shah Zaman	FWA(M)	BPS-07
178	Waqas Ali S/O Mushtaq Ahmad	FWA(M)	BPS-07
179	Adnan Khan S/O Fazal Rahim	FWA(M)	BPS-07
180	Faisal Khan S/O Noor Zamin Khan	FWA(M)	BPS-07
181	Younas Ahmad S/O Fazal Naeem	FWA(M)	BPS-07
182	Kashif Khan S/O Israr Muhammad	FWA(M)	BPS-07
183	Hazrat bilal s/o Ali Rahman	FWA(M)	BPS-07
184	Wasim Abbas S/O Ali Mohammad	FWA(M)	BPS-07
185	Ibrahim s/o Rahim Khan	FWA(M)	BPS-07
186	Abdul Basit S.O Jamil Rehman	FWA(M)	BPS-07
187	Saqib Khan S/O Banaras Khan	FWA(M)	BPS-07
188	Mohammad Faisal Zaman S.O Haider Zaman	FWA(M)	BPS-07
189	Muhammad Yasir S/O Shakirullah	FWA(M)	BPS-07
190	Muhammad Sajjad Alam S/O Abdul Ghaffar	FWA(M)	BPS-07
191	Sajjad Ali S/O Muhammad Hussain	FWA(M)	BPS-07
192	Ghafar ali f/n Niamat jan	FWA(M)	BPS-07
193	Kaleem Ullah S/o Feroz Khan	FWA(M)	BPS-07
194	Mujahid Ali S/O Muhammad Ashraf	FWA(M)	BPS-07
195	Numan Khan S/O Afsar Khan	FWA(M)	BPS-07
196	Yasir Qayyum Khattak S/O Qayyum Khan	FWA(M)	BPS-07
197	Sajad S/O Jan Said	FWA(M)	BPS-07
198	Shehriyar s/o Gulzar mohammad khan	FWA(M)	BPS-07
199	Hafiz Meraj Ul Islam S/O Tehmeed Gul	FWA(M)	BPS-07
200	Aamir Ali Shah S/O Rustam Shah	FWA(M)	BPS-07
201	Wajid Khan S/O Aziz Ullah	FWA(M)	BPS-07
202	Akbar Syed s/o Anwar Syed	FWA(M)	BPS-07
203	Mukhtiar Ali S/O Abdul Haq	FWA(M)	BPS-07
204	Rafi Ullah S/O Muhammad Alam	FWA(M)	BPS-07
205	Zain Ul Abidin S/O Shamsur Rahman	FWA(M)	BPS-07
206	Mohammad Fawad S.O Jehanzeb	FWA(M)	BPS-07
207	Muhammad Hamdan S/O Abdur Raqeeb	FWA(M)	BPS-07
208	Awais ahmad S/O Shaukat ali	FWA(M)	BPS-07
209	Mohammad Shams S/O Mohammad Rawez	FWA(M)	BPS-07
210	Naveed Ali s.o Umer Deer	FWA(M)	BPS-07

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211	Inam Habib Ullah Jan S/o Habib Ullah Khan	FWA(M)	BPS-07
212	Asmat Ali S/O Umar Deer	FWA(M)	BPS-07
213	Ashfaq Alam S.O Mohammad Akber	FWA(M)	BPS-07
214	Qaisar Abbas S/O Wazir Hassan	FWA(M)	BPS-07
215	Sher Muhammad S/O Amir Muhammad.	FWA(M)	BPS-07
216	Awais Khan S.O Mohammad Akram	FWA(M)	BPS-07
217	Muhammad Ehsan S/O Muhammad Yaseen	FWA(M)	BPS-07
218	Muhammad Zubair S/O Zaheer Ullah Khan	FWA(M)	BPS-07
219	Muhammad Rafiq S/O Nawab Nabi	FWA(M)	BPS-07
220	Farooq Rahman S/O Gulzar Khan	Chowkidar	BPS-03
221	Asif Mehmood S/O Muhammad Yaqub	Chowkidar	BPS-03
222	Muhammad Zahoor S/O Muhammad Roshan	Chowkidar	BPS-03
223	Fahad Dil S/O Dildar Hussain	Chowkidar	BPS-03
224	Zar Nawaz Khan S/O Abdul Qudoos Khan	Chowkidar	BPS-03
225	Hamid Ullah Khan S/O Sherdar Ali Khan	Chowkidar	BPS-03
226	Shoaib Khan S/O Hazrat Ullah Khan	Chowkidar	BPS-03
227	Ikram ud din S/O Ghulam din shah	Chowkidar	BPS-03
228	Gul Faraz Khan S/O Sadaqat Shah	Chowkidar	BPS-03
229	Mohammad Abas S.O Husain Khan	Chowkidar	BPS-03
230	Salim Bahadar S/O Ali Safdar	Chowkidar	BPS-03
231	Muhammad Alam Khan S/O Nawaz Khan	Chowkidar	BPS-03
232	Said Ali Shah S/O Khair Mehmood	Chowkidar	BPS-03
233	Mansoor Khan S/o Akbar Shah	Chowkidar	BPS-03
234	Abdul wadood s/o Tamash gul	Chowkidar	BPS-03
235	Khan Galib S/O Bakht Riaz	Chowkidar	BPS-03
236	Muhammad Husnain S/o Muhammad Bakhsh	Chowkidar	BPS-03
237	Aamir khan S/O Abdur Raheem	Chowkidar	BPS-03
238	Afser Ali S/O Sherzada	Chowkidar	BPS-03
239	Said Mohammad S/O Said Hakeem	Chowkidar	BPS-03
240	Rehmat Jalal S/O Sultanat Khan	Chowkidar	BPS-03
241	Muhammad Irshad S/O Gulshad	Chowkidar	BPS-03
242	Maarif Ullah S/O Munawar Khan	Chowkidar	BPS-03
243	Maaz Khan S/O Fazal Wadood	Chowkidar	BPS-03

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244	Mushtaq Ahmad S/O Muhammad Bacha	Chowkidar	BPS-03
245	Mohammad Zeeshan S/O Khan Zada	Chowkidar	BPS-03
246	Shahid Mehmood S/O Mohammad Yaseen shah	Chowkidar	BPS-03
247	Sheraz Khan S/O Muhammad Fiaz	Chowkidar	BPS-03
248	Sana ullah S/O Zahid Iqbal	Chowkidar	BPS-03
249	Muhammad Zafran S/O Akhtar Manoor	Chowkidar	BPS-03
250	Muhammad Rizwan S/O Zar Wali Khan	Chowkidar	BPS-03
251	Mohammad Ihtisham S/O Mohammad Yaseen	Chowkidar	BPS-03
252	Aurang Zeb S/O Syed Azam	Chowkidar	BPS-03
253	Abdul Aziz S/O Mirza Khan	Chowkidar	BPS-03
254	Fazal Rabi S.O Faridoon	Chowkidar	BPS-03
255	Aseel Khan S/o Sherzada	Chowkidar	BPS-03
256	Abdul Salam S/O Hassan	Chowkidar	BPS-03
257	Habib Ullah S/o Rustam Khan	Chowkidar	BPS-03
258	Aftab Khan S/O Najeeb Ullah Khan	Chowkidar	BPS-03
259	Ahmad Nawaz S/o Spin Khan	Chowkidar	BPS-03
260	Firdos Ahmad Khan S/O Shafi Ullah Khan	Chowkidar	BPS-03
261	Aamir khan S/O Alam zeb	Chowkidar	BPS-03
262	Tanveer Ahmad S/O Rafi Ullah Khan	Chowkidar	BPS-03
263	Adnan ahmad S/O Umar Farooq	Chowkidar	BPS-03
264	Kamal S.O Salar Mohammad	Chowkidar	BPS-03
265	Rasool Shah S/O Said Shah	Chowkidar	BPS-03
266	Amani Mulk S/O Amir Zada	Chowkidar	BPS-03
267	Raiees Khan S.O Aman Ullah Khan	Chowkidar	BPS-03
268	Abdul Jabar S.O Jawab Khan	Chowkidar	BPS-03
269	Mohammad Jawad S.O Noor Zaman Khan	Chowkidar	BPS-03
270	Aziz Ullah S/O Abid Ullah	Chowkidar	BPS-03
271	Syed Ibrar Hussain Shah S/O Syed Muhammad Shah	Chowkidar	BPS-03
272	Muhammad Saeed S/O Fazal Ur Rehman	Chowkidar	BPS-03
273	Abdul Khaliq S/O Ghulam Haider	Chowkidar	BPS-03
274	Wajid Hussain S/O Fazal Rehman	Chowkidar	BPS-03
275	Iftikhar Ali S/O Dolat Khan	Chowkidar	BPS-03
276	Jawad khan S/O Mamroz khan	Chowkidar	BPS-03
277	Syed Aqil Shah S/O Syed Saifullah	Chowkidar	BPS-03

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278	Muhammad Khadim s/o Haji Mohammad	Chowkidar	BPS-03
279	Arifullah S/O Aman Ullah	Chowkidar	BPS-03
280	Kaleem Ullah Jan S/O Intizar Ali	Chowkidar	BPS-03
281	Nawaz Ali Shah S/O Sher Ali Shah	Chowkidar	BPS-03
282	Azmat Gul f.n Bahadar Gul	Chowkidar	BPS-03
283	Adnan Khan S/O Jahanzeb	Chowkidar	BPS-03
284	Tufail Shah S/O Marifat Shah	Chowkidar	BPS-03
285	Imran Khan S.O Mushataq Husain	Chowkidar	BPS-03
286	Muhammad Jawad S/O Raees Khan	Chowkidar	BPS-03
287	Raza Ullah S/o Jehanzeb Khan	Chowkidar	BPS-03
288	Ihtesham S/O Muslim Khan	Chowkidar	BPS-03
289	Majid Ali S/O Qasim Khan	Chowkidar	BPS-03
290	Manzoor Khan S/O Naib Khan	Chowkidar	BPS-03
291	Amir Javed S/O Muhammad Javed	Chowkidar	BPS-03
292	Ziaul Haq S.O Amir Sardar	Chowkidar	BPS-03
293	Yousaf alam S/O Mohammd Alam	Chowkidar	BPS-03
294	Naveed Iqbal S/O Sardar Ahmed	Chowkidar	BPS-03
295	Amjid Ali S/O Shah Zareen	Chowkidar	BPS-03
296	Umair Khan S/O Badar Khan	Chowkidar	BPS-03
297	Abdullah S/O Muhammad Zeb	Chowkidar	BPS-03
298	Yasir Shah S/o Afsar Khan	Chowkidar	BPS-03
299	Faid Ali S/O Salar Khan	Chowkidar	BPS-03
300	Bakht Karam S.o Gul Ikhtiar	Chowkidar	BPS-03
301	Haider Ali S/O Nowsherwan Khan	Chowkidar	BPS-03
302	Salman s/o Shamsheer Ali	Chowkidar	BPS-03
303	Sajid Ali S/O Abdul Karim	Chowkidar	BPS-03
304	Hussain Ali S/O Mumtaz	Chowkidar	BPS-03
305	Kaleemullah S/O Muhammad Qayum	Chowkidar	BPS-03
306	Abid gul S/O Ahmad gul	Chowkidar	BPS-03
307	Muhammad Usman S/O Muhammad Saleem	Chowkidar	BPS-03
308	Aleef Zeb S/O Arsh Ullah	Chowkidar	BPS-03
309	Saeed Shah S/o Said Rahim Shah	Chowkidar	BPS-03
310	Iqra Bibi D/O Sultan Muhammad	Aya/Helper	BPS-03
311	Sunihra W/O Qamar Zaman Khan	Aya/Helper	BPS-03
312	Zahira W/O Bakhti Razziq	Aya/Helper	BPS-03
313	Aiman Jillani D/O Jafar Shah	Aya/Helper	BPS-03
314	Gul Bano D/O Faqir Jan	Aya/Helper	BPS-03
315	FARIDA HABIB W/O AMIR KHAN	Aya/Helper	BPS-03
316	Maryam Khan W/O Gulistan	Aya/Helper	BPS-03
317	Mumliqat Bibi w/o Masood Akhtar	Aya/Helper	BPS-03
318	Laila Ikram W/O Ikram Badshah	Ava/Helper	BPS-03

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319	Bibi Sehrish W/O Waheed Ur Rehman	Aya/Helper	BPS-03
320	Mehnaz baigum w/o akhtar hussian	Aya/Helper	BPS-03
321	Haseena Firdoos W/O Gul Mohammad	Aya/Helper	BPS-03
322	Uzma Dawood W.O Awais Shah	Aya/Helper	BPS-03
323	Hamsheda Begum D/O Nazir Hussain	Aya/Helper	BPS-03
324	Romana Daud w/o Atif hussain shah	Aya/Helper	BPS-03
325	Rukhsana D/O Islam-ud-Din	Aya/Helper	BPS-03
326	Nusrat Bibi D/O Ghulam Qadir	Aya/Helper	BPS-03
327	Seri Nagari W/O Fazli Razziq	Aya/Helper	BPS-03
328	Gulshad Bibi W/O Nazir Ahmad	Aya/Helper	BPS-03
329	Noreen bibi w/o Muhammad Pervaiz	Aya/Helper	BPS-03
330	Nadia w/o Fazal Muhammad	Aya/Helper	BPS-03
331	Maryam Akbar D/O Fazl-e-Akbar	Aya/Helper	BPS-03
332	Reshma Bibi d/o Hamaish	Aya/Helper	BPS-03
333	Shehla Gul D/O Sultan Shah	Aya/Helper	BPS-03
334	Saima Bibi d/o Syed dilawar shah	Aya/Helper	BPS-03
335	Khadijah Bibi W/O Mohammad Asif	Aya/Helper	BPS-03
336	Gulshan Ara D/O Sher Zaman	Aya/Helper	BPS-03
337	Basria D/O Aziz-ur-Rehman	Aya/Helper	BPS-03
338	Yasmeen Jamil W/O Jamil Ur Rehman	Aya/Helper	BPS-03
339	Ishrat Jahan W/O Shahid Iqbal	Aya/Helper	BPS-03
340	Bakht Zoon D/O Zabita Khan	Aya/Helper	BPS-03
341	Mehreen Begum D/O Arsalan Khan	Aya/Helper	BPS-03
342	Gul sya d/o Deedar Gul	Aya/Helper	BPS-03
343	Maryam.Shareef D/O Mohammad Shareef	Aya/Helper	BPS-03
344	Shazma D/O Taj Mohammad	Aya/Helper	BPS-03
345	Uzma Bibi W/O Zarshad Khan	Aya/Helper	BPS-03
346	Sumaira naz w/o waheedullah	Aya/Helper	BPS-03
347	Maryum D/O Nisar Hussain	Aya/Helper	BPS-03
348	Shamim Akhter W/O Mohammad Wahid	Aya/Helper	BPS-03
349	Maimona D/O Gul Afzal	Aya/Helper	BPS-03
350	Nazima Anjum W/O Kifayat Ullah	Aya/Helper	BPS-03
351	Nazneen D/O Mohammad Sadiq W/O Abdullah	Aya/Helper	BPS-03
352	Amreen Begum D/O Sher Aman Khan	Aya/Helper	BPS-03
353	Bibi Aisha D/O Saeed Ullah	Aya/Helper	BPS-03
354	Sajida D/O Abdul Razziq	Aya/Helper	BPS-03
355	Bagh Begum W/O Mian Akbar Ali	Aya/Helper	BPS-03

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356	Ulfat d/o Mohammad Hanif	Aya/Helper	BPS-03
357	Noor Parast w/o Dost Mohammad Khan	Aya/Helper	BPS-03
358	Shazia Ikram W/O Ikram Ullah	Aya/Helper	BPS-03
359	FATIMA BIBI D/O NOOR SHARIF	Aya/Helper	BPS-03
360	Roqia Bibi D/O Dil Faroz Khan	Aya/Helper	BPS-03


SECRETARY  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
POPULATION WELFARE DEPARTMENT

27/6-24

Endst: NO.SOE(PWD)4-67/Regularization/2018:- Dated Peshawar the, 17<sup>th</sup> September, 2018

Copy forwarded to the:-

1. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
2. Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department, Peshawar.
3. Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department, Peshawar.
4. Secretary to Govt. of Khyber Pakhtunkhwa, Planning & Development Department, Peshawar.
5. Accountant General, Khyber Pakhtunkhwa, Peshawar.
6. Director General, Population Welfare Khyber Pakhtunkhwa, Peshawar.
7. All DPWO, Khyber Pakhtunkhwa.
8. All District Account Officer, Khyber Pakhtunkhwa.
9. PS to Secretary, PWD, Peshawar.

  
SECTION OFFICER (ESTABLISHMENT)

(21)

LAMP P.O.P-653

GOVERNMENT OF KHYBER PAKHTUNKHWA  
POPULATION WELFARE DEPARTMENT  
OFFICE OF THE PROJECT DIRECTOR ESTABLISHMENT OF 100 FWCs  
Ali House, Qafila Road, Tehkal Payan, Peshawar.

1(1)2015/Project/FWD/Recruitment

Dated: 31/10/2016.

To,

Nabeela D/O Muhammad Saeed,  
Vill. Jambil P.o Kokara Tehsil Babozai Distt. Swat.

Subject.

OFFER OF APPOINTMENT FOR THE POST OF FAMILY WELFARE ASSISTANT (FEMALE) (ON FIXED PAY) UNDER ADP SCHEME No. 793/140073-ESTABLISHMENT OF 100 FWCs IN KHYBER PAKHTUNKHWA 2014-17.

With reference to your application for appointment against the project post of Family Welfare Assistant (Female) under the project titled "Establishment of 100 FWCs in Khyber Pakhtunkhwa 2014-17" and interview held on 27/08/2016, you are hereby offered appointment against the post of Family Welfare Assistant (Female) on fixed pay @ Rs. 15000/- per month & informed to report to District population Welfare Officer Swat for executing of contract agreement on stamp paper along with 02 witnesses from your side and also produce medical fitness certificate as per project policy of Government of Khyber Pakhtunkhwa. If you failed to report within 15 days, your appointment shall be treated as cancelled.



Project Director  
For Establishment of FWCs 2014-17

Copy to:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer/ comptroller of Accounts Swat.
3. PS to Advisor to Chief Minister for Population Welfare Khyber Pakhtunkhwa.
4. PS to Secretary, Population Welfare Department, KPK, Peshawar
5. PS to Director General, Population Welfare Department, KPK, Peshawar.
6. District Population Welfare Officer, Swat with the request to execute agreement on stamp paper and sign as witness from the government side on behalf of Project Director and the same should be furnished to this office for record please.

Project Director  
For Establishment of FWCs 2014-17

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To

The District Population Welfare Officer,  
Swat.

Subject:: ARRIVAL REPORT  
R/Sir,

In compliance with Project Director, for Establishment of FWCs 2014-17  
Population Welfare Department, Govt; of KPK, Peshawar vide offer letter F.No.  
1(1)2015/Project/PWD/Recruitment dated 31.10.2016.

I hereby submit my arrival report as FW-Assistant(F) for duty today on  
08.11.2016 please.

Yours Obediently

*Nabeela*

Mrs. Nabeela D/O Muhammad Saeed  
Village Jambil Kokarai. Swat

~~Admission~~  
*8/11/16*



23

OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER  
SAIDU SHARIF, SWAT

F.No.1(1)/Admn-2016(ADP) /294

Dated

24/11/2016  
17/08/2016

OFFICE ORDER

In Compliance with Project Director, for Establishment of 100-FWCs in Khyber Pakhtunkhwa 2014-17 Population Welfare Department, Government of Khyber Pakhtunkhwa Peshawar vide office order F.No.1(1)/2015/Project/PWD/Recruitment dated 31.10.2016. The following newly appointed Family Welfare Assistants(Female) have submitted their arrival report for duty and taken on the staff strength of this District on fixed salary basis) under ADP scheme No. 793/140073-Establishment of 100-FWCs in Khyber Pakhtunkhwa w.e.f the date of arrival & Posted against the vacant posts as noted against each with immediate effect.

S.No	Name of FW-Assistant(F)	Date of arrival	Place of posting
1	Mrs. Nabeela D/O Muhammad Saeed	08.11.2016	FW-Centre Landaykass
2	Mrs. Shabana Bibi D/O Fazal Ala	08.11.2016	FW-Centre Arkot
3	Miss. Seema Bibi D/o Tahir Khan	08.11.2016	FW-Centre Chuprial

District Population Welfare Officer  
Saidu Sharif, Swat

Copy to:

- 1- District Nazim, District Government, Swat for information please.
- 2- Project Director, for Establishment of 100-FWCs 2014-17, Population Welfare Department Government of Khyber pakhtunkhwa Peshawar for information with reference to above please.
- 3- PS to Director General, PWD, Govt; of Khyber Pakhtunkhwa Peshawar for information please.
- 4- The District Comptroller of Accounts Swat for information please.
- 5- Accountant /Store Keeper local office for information & n/action.
- 6- I/C FW-Centers Landaykass, Arkot & Chuprial for information & n/action.
- 7- Official Concerned for information & necessary action.
- 8- Personal file of the official concerned.

District Population Welfare Officer  
Saidu Sharif, Swat.

Annexure

B, (24)

**INQUIRY REPORT OF MRS. NABEELA (FWA-F) BPS-07, FW-CENTRE JAMBIL, REGARDING WILFUL ABSENCE FROM DUTY w.e.f 03.04.2021 TO 30.04.2021 IN REFERENCE WITH THE REPORT SUBMITTED BY MRS. GHUFRANIA SATTAR, FIELD TECHNICAL OFFICE, INCHARGE FW-CENTRE JAMBIL DATED 30.04.2021.**

**Inquiry Officer.**

- Dr. Anila, WMO/DDPWO (T) BPS-17, Incharge RHSC-A Kabal Swat.

**Background**

District Population Welfare Officer vide letter F.No. 1(7)/Admn/2020-21/606-10 dated 03.05.2021 has nominated the Undersigned as inquiry officer, (Annex-A) in reference with the report submitted by Mrs. Ghufrania Sattar, FTO Incharge FW-Centre Jambil (Annex-B) regarding the willful absence of Mrs. Nabeela, FWA(F) (BPS-07) FW-Centre Jambil from duty w.e.f 03.04.2021 to 30.04.2021.

**Proceeding**

In compliance with District population Welfare Officer, Swat office order F.No. 1(7)/Admn/2020-21/606-10 dated 03.05.2021. The undersigned being inquiry officer called Mrs. Nabeela FWA (F) of FW-Centre Jambil on 06.05.2021 to conduct interview against her, but she failed to appear before the Inquiry Officer. Personal file of the accused official was examined which revealed that number of times explanations followed by subsequent warnings called from her on account of her absence from duty (Annex-C), but still she is habitual absconder from duties.

**Ground Reality**

- i. Mrs. Nabeela, FWA (F) has remained absent from duty w.e.f. 03.04.2021 to 30.04.2021, as evident from the report of Field Technical Officer, and attendance register.
- ii. She failed to inform the Incharge regarding her absence.

**Recommendations**

- Deduction may be made from her salary for the absent period as she remained absent in light of the Finance Department letter No.SO(FR)/FD/5-14/2014 Date 16.12.2014.
- Minor penalty under rule 4 of E & D rules 2011 may be imposed on the above official.

Adin  
Pkt 02

**ATTESTED**

*[Signature]*  
Act. Asst. District Population Welfare Officer  
Sardar Sharif, Swat.

Inquiry Officer

*[Signature]*

Dr. Anila  
WMO/DDPWO (Tech:)

25

**INQUIRY REPORT IN RESPECT OF Mrs. NABEELA (FWA- FEMALE BPS-07) FWC JAMBIL**  
**REGARDING HER ABSENCE FROM DUTY w.e.f. 03-04-2021 to 30-04-2021**

**Background**

An enquiry committee was constituted by the DPWO Swat, under his office order F.No.1(7)/Admn/2020-21/1138-43 dated 09-06-2021, for the enquiry of absence of Mrs. Nabeela (FWA- Female BPS-07) from her duty w.e.f. 03-04-2021 to 30-04-2021 as reported by the Mrs. Ghufrania Sattar, FTO/Incharge, FWC Jambil. The committee consisted on the following Memebers.

1. Mr. Badshah Muhammad(Deputy Demographer BPS-17)
2. Mr. Nisar Ahmad (Accounts Assistant BPS-16)

**Proceedings**


In the light of the above quoted/cited order of DPWO Swat, Mrs. Nabeela (FWA- Female BPS-07) FWC Jambil was called vide this office letter F.No.1(7)/Admn/2020-21/1195-01 dated 14-06-2021, to appear before the enquiry committee in the DPWO Office on 16-06-2021. She personally appeared before the enquiry committee on the scheduled date and stated that she was suffering from COVID-19, therefore, she remained absent from her duty. Meanwhile, Mr. Najeeb Ullah, handed over the charge sheet, where she had one-week time for submitting her statement/reply to the enquiry committee. Within stipulated time, she provided COVID-19, Anti bodies test and her reply/statement.

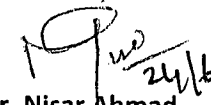
**Ground Realities**

The overall record of Mrs. Nabeela (FWA- Female BPS-07) FWC Jambil is unsatisfactory, however, in present case she has provided her medical test and written statement/reply which shows that she really suffered from COVID-19. She also claimed/stated that she had submitted her application to the Incharge FWC Jambil but, unfortunately, it is misplaced.


**Recommendations**

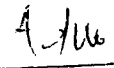
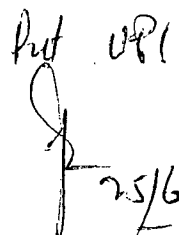
1. The record shows that she suffered from COVID-19, hence, her absence period w.e.f. 03-04-2021 to 30-04-2021 may be considered as medical leave and she may be kept under observation for a period on one year. She may also be warned not to repeat such irresponsible action/behavior in future.
2. Minor penalty under E&D Rules 2011 may also be imposed against her.

  
Mr. Badshah Muhammad  
Deputy Demographer BPS-17  
(Enquiry Officer)

  
Mr. Nisar Ahmad  
Accounts Assistant BPS-16  
(Enquiry Officer)

**TESTED**

  
Asst. District Population Welfare Officer  
Saidu Sharif, Swat.


  
  
25/6

بخدمت جناب دستر لٹ یا یو سی وی پی اس میں سید مہر علی  
(26) عنوان برکے جواب چارج ٹیسٹ  
جناب عالی! صحت پریشانی ہے کہ صحت پریشانی ہے بیماری کی شکایت

30.04.2021 سے 3/4/2021 تک  
پیش آئی تھی جو میں نے 2021/4/3 سے پیلر  
تک چھٹیوں کی تھی رونا بیماری، احتیاطی تدابیر، وجہ سے  
میں نے تیس دن تک چھٹیوں کی تھی کہ صحت پریشانی  
میں رو سلا لوگ ہی سہا رونا، بیماری، وجہ سے صحت پریشانی  
لیون آئی، بعد میں لیبارٹری میں Antibodies  
ٹیسٹ لیا اور وہ positive آیا۔ میں نے پتھریا  
منزلوں چھٹیوں، درخواست حاصل لٹری، انچارج لو  
درخواست بھیجی تھی۔ لیکن بعد میں پتھریلا،  
انچارج میں درخواست دفتر نہیں بھیجا تھا۔  
لیذا آپ صاحبک، خدمت میں عرضی ہے کہ  
سارے غلطیاں کو (بھی) معاف فرمائیں اور اندر  
میں اپنی ریورٹ تیار کر کے اور اپنی  
باز معافی، طلبکار ہوں اور  
شکر ہے

نام: سید مہر علی (F) Filial A  
فلاحی مرکز حاصل  
صوفیہ 23.6.2021

ATTESTED

  
ASST. MANAGER, SPECIALIZED MEMBER OFFICE  
Sindh Board, Sindh

27



# ANWAR CLINICAL LABORATORY SWAT

Saidu Sharif Swat PH # 0946-724848, 712627

Patient's Name .....**NABEELA**  
 Lab ID .....**B-30296**  
 Consultant .....**DR.**  
 Date..... **16/6/2021**  
 Investigation .....**Anti SARS – COVID-2 Antibodies**

TEST	RESULT	REFERENCE RANGE
------	--------	-----------------

Anti SARS COV-2 Antibodies	REACTIVE. .	(less than 1.0 Is Non-reactive)
----------------------------	-------------	---------------------------------

Patient's Value.....**8.31**

Method: Test was performed on cobas e 411, ROCHE using electrochemiluminescence immunoassay.

### Interpretation:

#### Non Reactive:

Antibodies appear late in infection and so symptomatic individuals should do PCR test to exclude SARS – COVID-19 infection.

Detectable antibodies generally take several days to develop after exposure to virus. Individuals who are in early phase of disease can also have non reactive results.

PCR test should be used to diagnose or exclude active SARS – CoV 19 infection.

#### Reactive:

Individuals who are reactive have exposure to SARS – COVID-19 virus.

Individuals willing to donate plasma should have high titer of reactive antibodies as well as a negative SARS– COVID-19 RT-PCR at the same time.

PLEASE DISCUSS THE RESULT(S) WITH YOUR CONSULTANT FOR CLINICAL CORRELATION AND MEDICAL ADVICE.

**Pathologist**

PROF. DR. ANWAR ALI  
MBBS, MCPS,  
M-Phil (Histopathology)

Prof.DR.IMRAN UD DIN  
MBBS, DC(Path)  
M-Phil (Haematology)

Prof. Dr. Mukamil Shah  
MBBS, DC(Path)  
M-Phil (Haematology)

Associate prof.  
DR IMTIAZ AHMAD  
MBBS,M-Phil (Microbiology)

Assistant Prof.  
S.M NAEEM  
M.Phil (Biochemistry)

DR NASIR ALI  
MBBS, DC (Path)


**Anwar Clinical Laboratory**  
Saidu Sharif Swat.  
0946-724848

**ATTESTED**

*[Signature]*  
Asst. Director Population Welfare Officer  
Saidu Sharif Swat

(28)

ATTENDANCE SHEET FOR INQUIRY OF MRS. NABEELA FWA (F) ON 16.06.2021.

S.No.	Name	Signature with Thumb impression	Remarks
1.	NABEELA FWA (F) Jambil		

**ATTESTED**



Asst. District Population Welfare Officer  
Saida Sharif, Swat.

**CHARGE SHEET**

I, Asim Zia, as District Population Welfare Officer Swat, Government of Khyber Pakhtunkhwa, as competent authority, hereby charge you Mrs. Nabeela Family Welfare Assistant (Female ) (BPS-07), Family Welfare Centre Jambil as follows in reference with the report submitted by inquiry committee consisting of Dr. Aneela, WMO/DDPWO (BPS 17) of RHSC-A Kabal Swat.

That you, while posted as Family Welfare Assistant (Female) BPS-07 FW-Centre Jambil committed the following irregularities:

a) That as per fact finding report submitted by inquiry officer/inquiry committee you willfully remained absent from official duty w.e.f 03.04.2021 to 30.04.2021 without any leave application or prior approval.


2. By reason of the above, you appear to be guilty of *guilty of habitually absencing* ~~herself from duty without approval~~ under rule (3)(d) 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 7-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 allegations is enclosed.



COMPETENT AUTHORITY

**ATTESTED**



**Asst. District Population Welfare Officer**

**DISCIPLINARY ACTION**

I, Asim Zia, as District Population Welfare Officer, Swat, as competent authority, am of the opinion that Mrs. Nabeela, Family Welfare Assistant (Female) (BPS-07), Family Welfare Centre Jambil has rendered herself liable to be proceeded against in reference with report submitted by inquiry committee consisting of Dr. Aneela, WMO/DDPWO (BPS-17) of RHSC-A Kabal Swat, as she committed the following acts/omissions, within the meaning of rule (3) of the Khyber Pakhtunkhwa Government Servant (Efficiency and Disciplinary) Rules, 2011.

**STATEMENT OF ALLEGATIONS**

- i. That you willfully remained absent from official duty w.e.f 03.04.2021 to 30.04.2021 without any leave application or prior approval.
- 2. For the purpose of inquiry against the said accused with reference to the above allegations, an inquiry officer/inquiry committee, consisting of the following is constituted under rule 10(1)(a) of the ibid rules:
  - i. Mr. Badsha Muhammad Dy: Deomgrapher (BPS-17), DPWO Swat.
  - ii. Mr. Nisar Ahmad Account Assistant (BPS-16), DPWO Swat.
- 3. The inquiry officer/inquiry committee shall, in accordance with the provisions of the ibid rules, provide reasonable opportunity of hearing to the accused, record its findings and make, within thirty days of the receipt of the order, recommendations as to punishment or other 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.

COMPETENT AUTHORITY

**ATTESTED**

**Asim Zia District Population Welfare Officer**  
Saidu Sharif, Swat.





OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER,  
SAIDU SHARIF, SWAT.

31



Al-Noor Medical Complex Street, Near Divisional Forest Office, Saidu Sharif, Swat

M dpwofficeswat@gmail.com



dpwofficeswat



@dpwoswat



0946-9240285



03339496108

F.No. 1(7)/Admn/2021-22/2094-02

Dated Swat, 28/09/2021

**OFFICE ORDER**

In compliance of District Population Welfare Officer, Swat F.No.1(7)/Admn/2020-21/1402-05 dated 28.06.2021 in reference with fact finding inquiry conducted against Mrs. Nabeela, Family Welfare Assistant (Female) BPS-07 of this District, a regular inquiry under the Khyber Pakhtunkhwa, Government Servant (Efficiency & Discipline) Rule 2011, was conducted.

**AND WHEREAS**, a fact finding inquiry was conducted earlier by the inquiry Officers of this District against her & it was proved that the official was absent from duty w.e.f 3<sup>rd</sup> April to 30<sup>th</sup> April 2021 and that she was habitually absent official.

**AND WHEREAS**, a regular inquiry under Khyber Pakhtunkhwa, Government Servant (Efficiency & Discipline) Rule 2011 was conducted. Resultantly a Charge Sheet along with statement of allegation was served upon the accused and under rule ibid was conducted wherein the charge were proved.

**AND WHEREAS**, she was given the chance of Personal Hearing but she failed to appear for the same.

**NOW THEREFORE**, the competent Authority after having considered the charges, evidence on record, report of the inquiry committee, exercising his powers under rule-14 (5) (ii) of the rules, ibid has imposed minor penalty of **"stoppage of one Annual Increment for two years"** along with deduction **pay & allowance** for the absent period upon Mrs. Nabeela, Family Welfare Assistant (Female), BPS-07 DPW-Office, Swat with immediate effect.

*Saidu Sharif*  
District Population Welfare Officer,  
Saidu Sharif, Swat.

Copy to the:-

1. PS to Director General, Population Welfare Department, Government of Khyber Pakhtunkhwa, Peshawar.
2. District Comptroller of Account Swat.
3. Accountant local office for information & necessary action.
4. Incharge Family Welfare Centre, Jambil for information with reference to her report dated 30.04.2021.
5. Mrs. Nabeela Family Welfare Assistant (Female), FWC-Jambil for information.
6. Personal file of the official concerned.
7. Members of inquiry committee for information.

*Saidu Sharif*  
District Population Welfare Officer,  
Saidu Sharif, Swat.

**ATTESTED**

*Saidu Sharif*  
Asst. District Population Welfare Officer  
Saidu Sharif, Swat.

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میرا بیٹا ہے

6/13/2021

RECEIVED  
SOUTH SHERIFFS OFFICE

Exp. 11/13/21  
Arms

میرا بیٹا ہے

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میرا بیٹا ہے

Head Office Population Welfare Office  
Saidu Sharif, Swat

01/08/2021

31/8/21

اپنے اپنے کاموں کو جاری رکھیں اور  
اپنی اپنی ذمہ داریاں ادا کریں۔

مقررہ وقت پر سرکار کے احکامات  
مطابق کاموں کو جاری رکھیں۔

اپنی اپنی ذمہ داریاں ادا کریں اور  
مقررہ وقت پر سرکار کے احکامات  
مطابق کاموں کو جاری رکھیں۔

مقررہ وقت پر سرکار کے احکامات  
مطابق کاموں کو جاری رکھیں۔

اپنی اپنی ذمہ داریاں ادا کریں اور  
مقررہ وقت پر سرکار کے احکامات  
مطابق کاموں کو جاری رکھیں۔

31/8/2021  
21/8/2021

مقررہ وقت پر سرکار کے احکامات  
مطابق کاموں کو جاری رکھیں۔

اپنی اپنی ذمہ داریاں ادا کریں اور  
مقررہ وقت پر سرکار کے احکامات  
مطابق کاموں کو جاری رکھیں۔

اپنی اپنی ذمہ داریاں ادا کریں اور  
مقررہ وقت پر سرکار کے احکامات  
مطابق کاموں کو جاری رکھیں۔

34

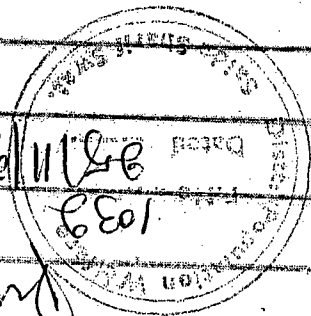
اپنی اپنی ذمہ داریاں ادا کریں اور  
مقررہ وقت پر سرکار کے احکامات  
مطابق کاموں کو جاری رکھیں۔

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ASST. DIRECTOR FOUNDATION  
THANET SWAT.

*[Signature]*

ATTESTED



*[Signature]*  
25/11/21  
Prof. V.P.

25/11/2021

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*[Handwritten text in Urdu]*

*[Handwritten text in Urdu]*

Date: 27.12.2021

F.W.C. Jambou

928/2021

2021

CPA

Handwritten signature

AGREEMENT FOUNDATION Welfare Officer  
SANTU STRAAT, SWAL

Handwritten signature

ATTESTED

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F.W.C. (F) ...

Handwritten signature

36

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Ms. Farhat Population Welfare Officer  
Saidu Sharif, Swat.

*[Handwritten signature]*

ATTESTED

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11-10-2011

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FMA (F) 1000

(37)

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38



OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER,  
SAIDU SHARIF, SWAT.

Al-Noor Medical Complex Street, Near Divisional Forest Office, Saidu Sharif, Swat

M dpwofficeswat@gmail.com dpwofficeswat @dpwoswat 0946-9240285 03339496108

F.No.1(7)/Admn/2021-22/297-05

Dated Swat, the 03/01/2022

To,

Mrs. Nabeela (FWA-F),  
Family Welfare Centre,  
Jambil.

Subject: - **NOTICE FOR WILLFUL ABSENCE FROM DUTY.**

Memo:

It is observed as per report of Incharge FW-Centre Jambil, that you remained absent from duty as follows, without any permission.

S.No.	Month	Absent Days	Remarks
1	September 2021	25 Days (01.09 to 25.09.2021)	
2	October 2021	09 days	
3	November 2021	01.11.2021 to 30.11.2021	
4	December 2021	01.12.2021 to 27.12.2021	

You are, therefore, directed to appear before the Undersigned and explain your position regarding willful absence from duty, within 15-day of the receipt of this notice, otherwise disciplinary action under the E&D rules, 2018 shall be initiated against you.

District Population Welfare Officer,  
Saidu Sharif, Swat.

Copy to the:-

1. PS to Director General, Population Welfare Department, Government Khyber Pakhtunkhwa, Peshawar.
2. Incharge FW-Centre Jambil for information.
3. Personal file of the official concerned.

**ATTESTED**

District Population Welfare Officer,  
Saidu Sharif, Swat.

Asstt. District Population Welfare Officer  
Saidu Sharif, Swat.





OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER,  
SAIDU SHARIF, SWAT.

Al-Noor Medical Complex Street, Near Divisional Forest Office, Saidu Sharif, Swat

M dpwofficeswat@gmail.com f dpwofficeswat @dpwoswat 0946-9240285 03339496108

F.No.1(7)/Admn/2021-22/4008-008

Dated Swat, the 26/01/2022

To  
The District Information Officer,  
Saidu Sharif, Swat.

Subject:- ADVERTISEMENT.

Memo:-  
Please find enclosed herewith Seven Copies of advertisement to be published in at least two local/national daily newspapers for Show Cause Notice of Mrs. Nabeela, Family Welfare Assistant (Female) Population Welfare Department District Swat and submit bill for payment accordingly please.

*[Signature]*  
District Population Welfare Officer,  
Saidu Sharif, Swat

- Copy to the:-
- 1- P S to Director General, Government of Khyber Pakhtunkhwa, Population Welfare Department, Peshawar.
  - 2- PS to Director General, Information and Public relation Department, Government of Khyber Pakhtunkhwa, Peshawar for information please.

*[Signature]*  
District Population Welfare Officer,  
Saidu Sharif, Swat

Received

**ATTESTED**

*[Signature]*  
26/01/2022

*[Signature]*  
Asst. District Population Welfare Officer  
Saidu Sharif, Swat

## (نوٹس غیر حاضری)

آپ مسماة نبیلہ فیملی ویلفیئر اسٹنٹ (فیمل) دختر محمد سعید گاؤں جامبیل ضلع سوات 28 اکتوبر 2021 سے تا حال بغیر کوئی وجہ بتائے اپنی ڈیوٹی سے غیر حاضر ہے، دوران غیر حاضری آپ کو آپ کے گھر کے پتے پر جواب طلبی فائل نمبر۔ 05-2901-22/Admn/2021-22/1(7) بتاریخ 03/01/2022 مراسلہ جاری کیا گیا ہے۔ جس میں آپ کو ڈیوٹی پر حاضر ہونے کے لئے ہدایت کی گئی ہے، لیکن اس کی باوجود آپ اپنی ڈیوٹی پر حاضر نہیں ہوئی اور نہ ہی اپنی وضاحت پیش کی۔ لہذا آپ کو آخری بار اخبار کی ذریعے متنبہ کیا جاتا ہے، کہ نوٹس ہذا کے اشاعت کے پندرہ دن کے اندر اندر زیر دسخطی کے روبرو پیش ہو کر اظہار وجوہ پرائے غیر حاضری تحریری طور پر پیش کریں، بصورت دیگر یعنی عدم تعمیل کی صورت میں آپ کی خلاف یکطرفہ محکمانہ تادیبی کارروائی کی جائے گی، جس کے نتیجے میں حکومت خیبر پختونخواہ کے مروجہ قوانین کے مطابق برخواستگی عمل میں لایا جائیگی۔

المستہر

ضلعی آفسر  
محکمہ بہبود آبادی ضلع سوات

ATTESTED



Asst. District Population Welfare Officer  
Saidu Sharif, Swat.



روزنامہ ج 3 27 جنوری 2022ء پشاور

## نوٹس غیر حاضری

آپ سہ ماہیہ نیلہ ٹیلی ویلفیئر اسٹنٹ (شمیل) ڈسٹرکٹ سید گاون جاہمیل ضلع سوات 28 اکتوبر 2021 سے تاحال بغیر کوئی وجہ بتائے اپنی ڈیوٹی سے غیر حاضر ہیں۔ دوران غیر حاضری آپ کو آپ کے گھر کے بچے پر جواب ملی فائل نمبر 03/01/2022/Amn/2021-22/2901-05 (7) تاریخ 1 تاریخ 03/01/2022 جاری کیا گیا ہے جس میں آپ کو ڈیوٹی پر حاضر ہونے کیلئے ہدایت کی گئی ہے لیکن اس کے باوجود آپ اپنی ڈیوٹی پر حاضر نہیں ہوئیں اور نہ ہی اپنی وضاحت پیش کی۔ لہذا آپ کو آخری بار اشتہار کے ذریعے متنبہ کیا جاتا ہے کہ نوٹس ہذا کی اشاعت کے پندرہ دن کے اندر اندر ذریعہ تخطی کے رو برو پیش ہو کر اظہار وجہ برائے غیر حاضری تحریری طور پر پیش کریں بصورت دیگر یعنی عدم عمل کی صورت میں آپ کی مخالف یکطرفہ حکمانہ تادیبی کارروائی کی جائے گی جس کے نتیجے میں حکومت خیبر پختونخوا کے مہذبہ قوانین کے مطابق برخواستگی عمل میں لائی جائے گی۔

اشٹنٹ ضلعی آفیسر، محکمہ بہبود آبادی ضلع سوات

INF(SW)07

ATTESTED

S. Sharif  
Asstt. District Population Welfare Officer  
Saidu Sharif, Swat.

42

ABC CERTIFIED DAILY CHAND SWAT CPNE MEMBER

روزنامہ  
عوام کی آواز  
سوات

چیف ایڈیٹر: رشید اقبال

Reg No. 475

جلد نمبر 19 بھرات 27 جنوری 2022، 23 جمادی الثانی 1443ھ، صفحات 8، قیمت 10 پاپے 34

**نوٹس فیرو حاضری**

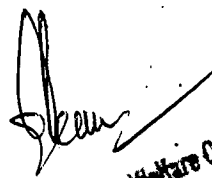
آپ سہ ماہیہ نیلہ ٹیلی وینٹیز اسٹنٹ (ٹیلی) دفتر محمد سعید گاؤں جامیل ضلع سوات 28 اکتوبر 2021 سے تاحال بغیر کوئی وجہ بتائے اپنی ڈیوٹی سے غیر حاضر ہے، دوران غیر حاضری آپ کو آپ کے گھر کے پتے پر جواب طلبی نمبر - 5 29010 22-2021/Admn/1(7) بتاریخ 03/01/2022 مراسلہ جاری کیا گیا ہے۔ جس میں آپ کو ڈیوٹی پر حاضر ہونے کیلئے ہدایت کی گئی ہے لیکن اس کے باوجود آپ اپنی ڈیوٹی پر حاضر نہیں ہوئی اور نہ ہی اپنی وضاحت پیش کی، لہذا آپ کو آخری بار اخطار کے ذریعے متنبہ کیا جاتا ہے کہ نوٹس پلائی اشاعت کے چھ روزوں کے اندر اندر زیر تخطی کے روز روڈ پیش ہو کر اظہار وجہ برائے غیر حاضری تحریر طور پر پیش کریں، بصورت دیگر تیسری عدم تعمیل کی صورت میں آپ کے خلاف یکطرفہ حکمانہ تادیبی کارروائی کی جائے گی، جس کے نتیجے میں حکومت خیبر پختونخوا کے مرہمہ قوانین کے مطابق برضائی عمل میں لائی جائے گی۔

الستہر

ضلعی افسر، محکمہ بہبود آبادی ضلع سوات

INF(SW)07

ATTESTED

  
Asst. District Population Welfare Officer  
Saidu Sharif, Swat

ASST. DISTRICT Population Welfare Officer  
Saidul Shant, Swat.

24-11-2021



ATTENTION

Handwritten text in Urdu, likely a letter or official communication, containing several lines of text.

PNWA-1 (T)/Admn/2020-21/2459-63

43

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James - Deemant Agency  
Director of Operations & Administration  
Stationery

Asst. District Probation Welfare Officer  
Saidu Sharif, Swat.

*[Handwritten Signature]*

ATTESTED

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13-5

Admin / 2024-23 / 2131-55 (17) FPO

*[Handwritten Signatures]*

44

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Local Health Promotion Welfare Officer  
Saidu Sharif, Swat

*[Handwritten signature]*

11-10-2021 مورخہ ✓

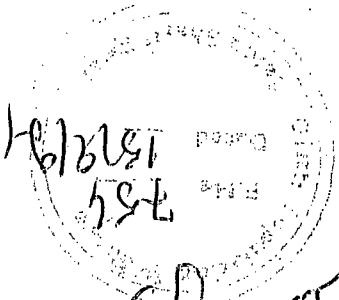
*[Handwritten notes]*  
کام  
کام

ATTESTED

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45

*[Handwritten text at the bottom of the page, possibly a signature or additional notes.]*



15-09-2021

Attestation Welfare Officer, Shant-Swat.

ATTESTED

Handwritten text in Urdu, likely a certificate or report, mentioning a person's name and details. The text is partially obscured by the stamp and signature.

1. No. I (7) / Admn / 2021-22 / 1805-09

بابت ادب کے ساتھ سے مندرجہ ذیل

درج ذیل سے مندرجہ ذیل

46

صاحب عالی:

Handwritten text at the bottom of the page, possibly a signature or additional notes.



West District Population Welfare Officer  
Bhakti Bharti, Swat

AMMA (M) / 1851-53  
Date: 11-11-2021

**ATTENTION**

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AMMA (M) / 1851-53 - 22/1851-2021 (7) Adm

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47

1851/1851  
735

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OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER,  
SAIDU SHARIF, SWAT.

48



Al-Noor Medical Complex Street, Near Divisional Forest Office, Saidu Sharif, Swat.

M dpwofficeswat@gmail.com



dpwofficeswat



@dpwoswat



&



0946-9240285



03339496103

F.No.1(7)/Admn/2020-21/1402-05

Dated Saidu Sharif the 22/06/2021

**OFFICE ORDER**

In order to conduct a de-novo inquiry under rule (6), in inquiry committee consisting of the following is hereby constituted under rule 10(1)(a) of E&D rule 2011, in order to investigate the contents of the initial inquiry conducted by Dr. Aneela vide this office order F.No. 1(7)/Admn/2020-21/606-10 dated 03.05.2021.

1. Dr. Khalida Imran SMWO, Incharge RHSC-A Saidu Sharif, Swat.
2. Mrs. Zeenat Wahid FWW, Incharge FW-Centre Mingora.

Copy forwarded to the: -

*dc* District Population Welfare Officer  
*ns* Saidu Sharif, Swat.

1. Member of the inquiry committee alongwith copy of Charge Sheet with the direction to submit its report within stipulate time.
2. Mr. Najeeb Ullah Departmental representative to hand over record and cooperation with Inquiry committee.
3. Mrs. Nabeela FWA (F), alongwith Charge Sheet with the direction to appear before the inquiry committee.

*dc* District Population Welfare Officer  
*ns* Saidu Sharif, Swat.

**ATTES IED**

*[Signature]*

Asst. District Population Welfare Officer  
Saidu Sharif, Swat.

5.7.2021

2021

ملائیہ

تاریخ

FLIPED



Asst. District Population Welfare Officer  
Sandu Smart, Swat.

*[Signature]*

ATTESTED

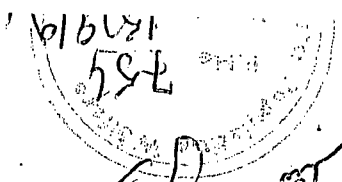
مستند

: منجانبہ سے ملنے والی دستاویزوں کی تصدیق  
 صحیح و سچے مطابق ہے۔  
 اس میں کوئی ترمیم یا تبدیلی نہیں کی گئی ہے۔  
 اس کے ساتھ ساتھ اس میں کوئی اضافہ یا کمی نہیں کی گئی ہے۔  
 اس کے علاوہ اس میں کوئی اور دستاویز نہیں ہے۔  
 اس کے ساتھ ساتھ اس میں کوئی اور دستاویز نہیں ہے۔  
 اس کے علاوہ اس میں کوئی اور دستاویز نہیں ہے۔

(48)

تاریخ

ملائیہ



FWA (F) 181919

Handwritten text in Urdu, appearing to be a letter or report. The text is written in a cursive style and covers most of the page.

ST. JAMES' POPULATION HEALTH CENTER  
South Shant, Swat

ATTESTED

F.No. I (7) / Admn / 2021-22 / 1805-09

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Annexure "D"  
OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER,  
SAIDU SHARIF, SWAT.



Al-Noor Medical Complex Street, Near Divisional Forest Office, Saidu Sharif, Swat

M dpwofficeswat@gmail.com    dpwofficeswat    @dpwoswat    0946-9240285    03339496108

F.No.1(7)/Admn/2020-21/4398/403

Dated Swat, the 24/02/2022

**OFFICE ORDER**

**WHEREAS**, Mrs. Nabeela Family Welfare Assistant (Female) (BPS-07), of Family Welfare Centre Jambil Swat was absent from duty w.e.f 28.10.2021 without any intimation to this office.

**AND WHEREAS**, a notice was issued to her home address vide letter F.No.1(7)/Admn/2021-22/2701-05 dated 3<sup>rd</sup> January 2022 directing her to resume duty within fifteen (15) days of the receipt of the notice under the Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) rules, 2011 and in case of failure, disciplinary action would be initiated against her under the rules ibid;

**AND WHEREAS**, the official concerned did not report for duty within the stipulated period and in order to proceed further under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Disciplinary) Rules, 2011, a notice was published in Daily "Aaj Newspaper Peshawar on 27.01.2022 and Daily "Chand Newspaper Swat on 27.01.2022 directing her to resume duty within 15 days of publication of the notice and intimate the cause of her absence, failing which ex-parte decision would be taken against her under the relevant law/rules;

**AND WHEREAS**, the stipulated period expired on 10.02.2022 and the official did not resume her duty.

**NOW THEREFORE**, the District Population Welfare Officer, Swat being the competent authority, has been pleased to impose major penalty of "**Removal From Service**" upon Mrs. Nabeela, Family Welfare Assistant (Female) (BPS-07) under Rule-9 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, with immediate effect. The absence period w.e.f 28.10.2021 till date is treated as unauthorized absence from duty.

District Population Welfare Officer,  
Saidu Sharif, Swat.

Copy to the:-

1. District Account Officer Swat for information please.
2. PS to Director General, Population Welfare Department, Government of Khyber Pakhtunkhwa, Peshawar for information.
3. Accountant local office for information & compliance.
4. PS to Deputy Commissioner Swat.
5. Focal person HR local office for information.
6. Focal person RMB, local office for information.
7. Incharge FW-Centre Jambil for information.
8. Official concern (Now removed from Service).

District Population Welfare Officer,  
Saidu Sharif, Swat.

o/c

(53)

Appellant: E-3  
12-05-2022

**BEFORE THE DIRECTOR GENERAL POPULATION WELFARE DEPARTMENT KHYBER  
PAKHTUNKHWA, PESHAWAR**

In the matter of,

Mrs. Nabeela Family Welfare Assistant (F) BPS 07, Family Welfare Center Jambil, District Swat.

*Nabeela*  
Appellant

Versus

1. The Director General, Population Welfare Department, Government of Khyber Pakhtunkhwa, Peshawar
2. The District Population Welfare Officer District Swat.

..... Respondents

**Departmental Appeal against the Order Reference No. F.No. 1(7)/Admn/2020-21/4403/403 Dated. 24-02-2022, whereby the appellant has been removed from service by imposing a harsh and major penalty.**

Respectfully sheweth,

1. That the appellant was appointed as family welfare assistant in the year 2016 and since then the appellant has performed her duties to the best of her abilities and there is no iota of complaint against the appellant at any forum rather the services rendered by the appellant received appreciation from the high ups for her devotion and commitment to the department.
2. That it is worth to mention here that, the allegations levelled against the appellant for which, received a show cause notice from the respondent department for her absence from duty vide letter dated F.No.(1)/Admn/2021-22/18005-09, to which the appellant replied through a written application dated 15-09-2021 by mentioning the reason for the absence from duty, which was accepted by the department.
3. That it is also worth to mention here that, the incident which took place in the house of the appellant was of serious nature for the which the appellant along with her entire family was displaced for a long period of time by receiving life threats from the violent inhabitants of the village.

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(Copy of FIR and application dated. 15/09/2021 is attached here with this appeal).

4. That a show cause notices have allegedly been served upon the appellant by the respondent department for absence from duty, which have never received to the appellant, nor the appellant know about the issuance of any of such notices, as the appellant in the meanwhile has moved another application to the department for granting leave as the appellant was unable to join her duty in such a serious circumstances.
5. That the respondent department has proceeded ex-parte against the appellant and removed from service by imposing a harsh and major penalty upon the appellant and was condemned unheard, which act of the appellant is not intentional and deliberate but due to the reason mentioned in the application and an FIR of serious nature which was registered against one the family member of the appellant which caused the entire family of the appellant for displacement has not been considered.
6. that for the reasons mentioned in the proceeding para, the appellant got the impugned order very late. i.e. 28/04/2022.
7. that the appellant is not a habitual absentee and has always been served the department with zeal and vigor and by imposing such harsh penalty of removing the appellant from service is against the law and justice. The allegations levelled against the appellant have no footing, hence instant departmental appeal before your good self inter alia on the following grounds.

#### **Grounds**

- a) That the impugned order dated. 24/02/2022 is illegal, unlawful and has been passed without appreciating the real facts and the decision has been taken in real haste.
- b) That the appellant was not called for personal hearing and was condemned unheard while violating the Latin Maxim Audi Alterm Partem. The impugned order was passed in haste during the absence of the appellant

55

without hearing the version of the appellant and against the article 10-A of constitution of Islamic Republic of Pakistan, 1973.

- c) That it was the primary duty of the authority to first prove the allegation by holding a regular inquiry as has been held by the honorable Tribunal and supreme court of Pakistan in many cases, i.e. PLD 2008 SC 451, 1997 SCMR 1543. No inquiry was held in the case of the appellant.
- d) That the appellant was deprived from her bread and butter to herself and her family, which is against the provision of the constitution of Islamic Republic of Pakistan 1973, hence a magnanimous view of the matter may kindly be taken, In the best interest of justice.

#### Prayer

In aforementioned circumstances, it is humbly prayed that the departmental appeal in hand may kindly be accepted and the impugned order dated. 24-02-2022 passed by the district population welfare officer district swat, may kindly be set aside and the services of appellant may graciously be restored to its original place in the best interest of justice.

Any other relief the authorities may deem fit and proper may also be awarded to the appellant.

Appellant

Mrs. Nabeela

Family Welfare Assistant

BPS-07, Family Welfare Center District Swat

*Nabeela*  
12/5/2022



2010-2011  
2011-2012  
2012-2013

Handwritten notes in Urdu script, likely a lecture or study material. The text is dense and covers various topics, possibly related to medicine or biology, as indicated by the word 'Medicine' at the top right. The notes are written in a cursive style and include several lines of text that are difficult to transcribe precisely due to the handwriting and perspective.

Handwritten text at the bottom of the page, including the word 'Amecre' and 'Transfer' written in a stylized font. Below this, there is a circled number '56' and some additional handwritten notes.

25-11-2021 ع.ت

بیت بین الاقوامی برائے  
مطالعہ اسلامیات

میں نے اپنے دور رسالہ کے بارے میں  
میں نے اپنے دور رسالہ کے بارے میں  
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میں نے اپنے دور رسالہ کے بارے میں

(57)

میں نے اپنے دور رسالہ کے بارے میں

میں نے اپنے دور رسالہ کے بارے میں

58



OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER,  
SAIDU SHARIF, SWAT.

Near Zarai Tarqlati Bank (Ltd:), at Collage Colony Saidu Sharif Swat. 03339496108

dpwofficeswat@gmail.com dpwofficeswat @dpwoswat 0946-9240285

F.No.1(7)/Admn/2018-19/577-14

Dated Saidu Sharif, the 25/11/2018.

To

1. Mrs.Haleema Bibi, FWW I/C FWC Totanobandai.
2. Mrs.Nabeela, FWA (F), FWC Jambil.
3. Mrs.Sharafat Bibi, FWA (M), FWC Dureshkhela.
4. Mr.Adalat Khan, FWA (M), FWC Mingora.
5. Mr.Muhammad Akbar, FWA (M), FWC Qamber.
6. Mrs.Rabia, FWA (F), FWC Manglawar.

Subject:- ABSENCE FROM MONTHLY MEETING.

Memo:-

It has been observed with grave concern that you wilfully remained absent from monthly meeting held on 03 & 05.11.2018 without permission/prior information or leave application. Attending of monthly meeting is mandatory, where important issues along with performance is discussed.

This sort of attitude is highly objectionable, leading towards "inefficiency" and "indiscipline" under the Establishment Code of Services. You are therefore, called upon to explain your position within 03-days of the receipt of this communication, as to why no disciplinary action be taken against you under the rules.

DISTRICT POPULATION WELFARE OFFICER  
SAIDU SHARIF, SWAT

Copy to:-

1. PS to Director General, Population Welfare Department, Government of Khyber Pakhtunkhwa, Peshawar.
2. All Incharge Family Welfare Centres & Mobile Services Unit for information with the direction to ensure attendance in monthly meeting of your own and your subordinate staff positively.
3. Personal Files of the officials concerned.

ATTES

*[Signature]*

Asst. District Population Welfare Officer  
Saidu Sharif, Swat.

*[Signature]*  
DISTRICT POPULATION WELFARE OFFICER  
SAIDU SHARIF, SWAT

(58)



OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER,  
SAIDU SHARIF, SWAT.  
Al-Noor Medical Complex Street, Near Divisional Forest Office,  
Allah-o-Akbar Colony, Saidu Sharif, Swat. 03339496108  
M: dpwofficeswat@gmail.com dpwofficeswat @dpwoswat 0996-9240285



F.No.1(7)/Admn/2018-2019/563-77  
To,

Dated Saidu Sharif, the 26/06/2019

1. Mrs. Nabeela  
Family Welfare Assistant (Female). In charge of the Center,
2. Mr. Majid Khan,  
Family Welfare Assistant (Male),
3. Nargas, (Aya)
4. Hazrat Raheem (Chowkidar)  
Family Welfare Center, Jambil at Kokarai, District. Swat.

Subject: - ABSENCE FROM DUTY /EXPLANATION THEREOF.  
Memo:

It has been noticed with great concern that as per complain No.KP200619-321010 dated 20-06-2019 in Pakistan Citizen's Portal, that w.e.f. 10.06.2019 to 20.06.2019, Family Welfare Center, Jambil at Kokarai, found locked and the entire staff was disappeared from official duty without any information/applications to this office.

This sort of attitude on your part, as a Government Servant, is highly objectionable and is gross 'misconduct' and 'indiscipline' under the rules.

You are, therefore, called upon to explain your position to the above irregularities within 03-days of the issue of this letter positively. The absent period-as mentioned above will be deducted from your salary besides disciplinary proceedings under E&D rule 2011 in light of Finance Department Govt: of Khyber Pakhtunkhwa letter No. SO (FR)/FD/5-14/2014 dated 16-12-2014 accordingly.

DISTRICT POPULATION WELFARE OFFICER  
SAIDU SHARIF, SWAT.

Copy forwarded to the:-

- 1- District Comptroller of Accounts, Swat.
- 2- PA to Deputy Commissioner, Swat with reference to the complaint as quoted above.
- 3- PS to Director General, Government of Khyber Pakhtunkhwa, Population Welfare Department, Peshawar.
- 4- Accountant local office with direction to deduct salary of the incumbents of the above period as mentioned above.
- 5- Focal Person, PMRU, Local office.
- 6- Personal File of the officials concerned.
- 7- Master File.

ATTESTED

Asst. District Population Welfare Officer  
Saidu Sharif, Swat.

DISTRICT POPULATION WELFARE OFFICER  
SAIDU SHARIF, SWAT.



(60)

**OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER,  
SAIDU SHARIF, SWAT.**

Al-Noor Medical Complex Street, Near Divisional Forest Office, Saidu Sharif, Swat.

M dpwofficeswat@gmail.com | dpwofficeswat | @dpwoswat | 0946-9240285 | 0333-9496100

F.No.1(7)/Admn/2020-21/2545-57

Dated Saidu Sharif, the 07/12/2020

To,

All the Family Welfare Assistant (Female) concerned,  
In District Swat.

Subject: - **LOW PERFORMANCE/WARNING.**

Memo:

From the perusal of Monthly Performance Report for the month of November 2020, it has been seriously observed that you have not achieved Eligible Couples Registration during the month as mentioned against each below, which are very important activities.

S.No.	Name of FWAs (F)	Name of FW-Centres	Total Registration
1.	Miss. Shaheen Akhtar	FWC Charbagh	80
2.	Mrs. Nabeela	FWC Jambil	50
3.	Mrs. Ayesha Khan	FWC Khwazakhela	80
4.	Mrs. Ayesha Noor	FWC Bahrain	50
5.	Mrs. Sharafat Bibi	FWC Matta	68
6.	Mrs. Farzna	FWC Dureshkhela	77
7.	Mrs. Shamim Akhtar	FWC Fatehpur	60
8.	Miss. Raheema	FWC Kalam	45
9.	Mrs. Bakht Haram	FWC Gul Kada	72
10.	Mrs. Azra	FWC Tahir Abad.	55
11.	Miss. Yasmin	FWC Shalpin	44

Though you have been directed time and again verbally and in black & white to carry out the said activities regularly/honestly. In spite of this you are not in a position to change your behavior and comply with the orders. This lethargic and careless attitude on your part is highly objectionable and tantamount to clear violation of code of service and shows your inefficiency, irresponsibility and disinterest towards official duties.

You are, therefore, **warned**, to be careful in future and carry out all the activities as per assigned targets, otherwise strict disciplinary action will be taken against you under the rules.

District Population Welfare Officer,  
Saidu Sharif, Swat.

Copy to the:-

1. PS to Director General,, Population Welfare Department, Government  
Khyber Pakhtunkhwa, Peshiawar.

Personal file of the official concerned.

**ATTESTED**

*[Signature]*

*[Signature]*



OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER,  
SAIDU SHARIF, SWAT.

Al-Noor Medical Complex Street, Near Divisional Forest Office, Saidu Sharif, Swat.

M dpwofficeswat@gmail.com F dpwofficeswat @dpwoswat & 0946-9240285 0333945010

F.No.1(7)/Admn/2020-21/2927-31

Dated 17/01/2021

To,

1. Mr. Majid Khan, FWA (M),
2. Mrs. Nabeela, FWA (F),

Family Welfare Centre,  
Jambil.

**Subject: - ABSENCE FROM DUTY/EXPLANATION THEREOF.**

Memo:

The undersigned paid visit to Family welfare Centre Jambil on 01:15 P dated 27.01.2021 and you were found absent from your official duties without prior information or leave application.

It shows that you have no interest in your job and do not devote yourself to official duties. This sort of attitude is highly objectionable which is tantamount to gross 'misconduct' and 'indiscipline' under the rules.

You are, therefore, called upon to explain your position with cogent reasons within 3-days of the receipt of this communication positively failing which strict disciplinary action shall be taken against you under the rules.

District Population Welfare Officer,  
Saidu Sharif Swat.

Copy forwarded to the:-

1. P.S to Director General Population Welfare Department, Government of Khyber Pakhtunkhwa Peshawar.
2. Personal file of the official concerned.

**ATTESTED**

*S. Khan*  
Asst. District Population Welfare Officer  
Saidu Sharif Swat.

District Population Welfare Officer,  
Saidu Sharif Swat.

(62)

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**BEFORE THE PUBLIC INFORMATION OFFICER**  
**DISTRICT/ASSISTANT COMMISSIONER (REVENUE),**  
**TEHSIL BABUZAI, SWAT.**

Subject: Right to Information (RTI) Application U/S 7 of Khyber Pakhtunkhwa  
Right to Information Act, 2013, Khyber Pakhtunkhwa for provision of  
attested copies of the required documents

Respected Sir,

As cited above, I Nabeela wife of Adalat Khan, Resident of Jambil, Tehsil Babozai, District Swat, and being a citizen of Islamic Republic of Pakistan and the rights conferred in the Khyber Pakhtunkhwa RTI Act 2013 to the citizens, I would please request to direct the District Population Welfare Officer, Saidu sharif, Swat, to provide me with the attested copies of the following documents under section 7 of the ibid Act, needed for court proceedings.

- 1) Regularization order of the applicant.
- 2) Copies of enquiry proceedings initiated and finalized against the applicant.

Applicant

*(Signature)*

Nabeela wife of Adalat Khan  
Ex Family Welfare assistant  
(FWC) Jambil  
Cell No. 03419750043  
CNIC No.15602-9903665-4  
Dated: 26/07/2022

63

OFFICE OF THE  
ADDITIONAL ASSISTANT COMMISSIONER (REVENUE)  
SWAT

No. \_\_\_\_\_ /AAC/(Revenue)

Dated 21/11/2012

To,

The District Population Welfare Officer,  
Saidu Sharif Swat.


Subject.

RIGHT TO INFORMATION (RTI) APPLICATION U/S 7 OF KHYBER  
PAKHTUNKHWA RIGHT TO INFORMATION ACT, 2013, KHYBER  
PAKHTUNKHWA FOR PROVISION OF ATTESTED COPIES OF THE  
REQUIRED DOCUMENTS.

Memo -

Reference to the letter received from an applicant (copies enclosed), it is stated that the necessary information may be provided to this office as well as to the applicant concerned under Sec: 7 of the Right to information Act-2013 of Khyber Pakhtunkhwa within 03 days, positively.

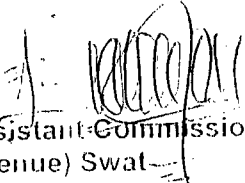
Forgoing in view, it is also stated that the matter may be treated as most urgent, please.

  
Additional Assistant Commissioner,  
(Revenue) Swat

No. \_\_\_\_\_ /AAC(Revenue)

Copy forwarded to the.

- 1) Chief Information Commissioner, Peshawar, please.
- 2) Commissioner, Malakand Division, Saidu Sharif Swat, please.
- 3) Deputy Commissioner Swat, please.
- 4) Mr. Riaz Khan Daulzai Commissioner-II, RTI Peshawar, please.
- 5) Mrs. Sania Sardar, Assistant Registrar RTI Malakand Division; please.
- 6) Mr. Tariq Kamal s/o Haroon Rashid r/o Charbagh, Swat.

  
Additional Assistant Commissioner,  
(Revenue) Swat



(64)

REMINDER-1



OFFICE OF THE  
ADDITIONAL ASSISTANT COMMISSIONER (REVENUE)  
SWAT

No. 296 /AAC/(Revenue)

Dated 1-8 /2022

To,


The District Population Welfare Officer,  
Saidu Sharif Swat.

Subject: **RIGHT TO INFORMATION (RTI) APPLICATION U/S-7 OF KHYBER PAKHTUNKHWA RIGHT TO INFORMATION ACT, 2013, KHYBER PAKHTUNKHWA FOR PROVISION OF ATTESTED COPIES OF THE REQUIRED DOCUMENTS.**

Memo:-

Reference this office letter No. 290/AAC(Revenue) dated 27/07/2022 on the above noted subject (copy enclosed for ready reference).


Forgoing in view, the requisite documents are still awaited. Therefore, you are once again intimated to provide the necessary / requisite documents within 02 days positively without any failure since the higher ups are pressing hard for the same.

  
Additional Assistant Commissioner,  
(Revenue) Swat

No. 297-202 /AAC(Revenue)

Copy forwarded to the:-

- 1) Chief Information Commissioner, Peshawar, please.
- 2) Commissioner, Malakand Division, Saidu Sharif Swat, please.
- 3) Deputy Commissioner Swat, please.
- 4) Mr. Riaz Khan Daudzai Commissioner-II, RTI Peshawar, please.
- 5) Mrs. Sania Sardar, Assistant Registrar RTI Malakand Division, please.
- 6) Miss: Nabila W/O Adalat Khan R/O Jambil Kokarai Tehsil Babuzai District Swat.

  
Additional Assistant Commissioner,  
(Revenue) Swat

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OFFICE OF THE  
DISTRICT POPULATION WELFARE OFFICER,  
SAIDU SHARIF, SWAT.

Gulkada No.1, Kamran Khan Street Saidu Sharif, Swat

M dpwofficeswat@gmail.com 0946-9240285 03339496108

F.No.1(7)/Admn/2022-23/567-09

Dated Swat the 1/8/2022

To,

✓ The Additional Assistant Commissioner,  
(Revenue) Swat.


Subject: - **RIGHT TO INFORMATION (RTI) APPLICATION U/S-7 KHYBER  
PAKHTUNKHWA RIGHT TO INFORMATION ACT, 2013, KHYBER  
PAKHTUNKHWA FOR PROVISION OF ATTESTED COPIES OF  
THE REQUIRED DOCUMENTS.**

Memo:

Please refer to your Office letter No.290/AAC/(Revenue) dated 27.02.2022 on the above cited subject and to enclose herewith the necessary information in respect of Nabeela W/o Adalat Khan, Ex-Family Welfare Assistant (Female) of this department as desired.


**Encls:**

- Regularization Order of the applicant.
- Copies of inquiry proceedings & finalized.

  
District Population Welfare Officer,  
Saidu Sharif, Swat.

Copy forwarded to the:-

- PS to Director General, Population Welfare Department, Government of Khyber Pakhtunkhwa, Peshawar for information.

  
District Population Welfare Officer,  
Saidu Sharif, Swat.

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**BEFORE KHYBER PAKHUNKHWA SERVICES TRIBUNAL AT  
PESHAWAR**

**WAKALAT NAMA**

Service Appeal No. \_\_\_\_\_ of 2022

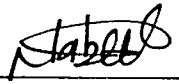
Titled Mst. Nabeela versus Government of KP and others.

I, Mst. Nabeela w/o Adalat Khan (Ex- Family Welfare Assistant) R/O Village Jambil, Kokarai, Tehsil Babozai, Distt: Swat do hereby appoint **Sabir Shah (ASC), Falak Naz Khan & Jamal Shah (AHCs)** in the above mentioned case, to do all or any of the following acts, deeds and things:-


- 1) To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
- 2) To sign and verify and file, petitions, appeals, affidavits and applications as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
- 3) To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of the proceedings.
- 4) To do any act necessary or ancillary to the above acts, deed and things.
- 5) To appoint any other counsel to do any/all of the acts, deeds and things.
- 6) I/we, shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our non appearance, any adverse judgment/order/decree is passed, they will not be held responsible.

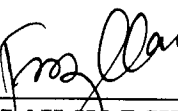
IN WITNESS whereof I/we have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this **10/09/2022**.

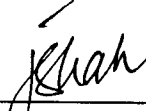
**Signature of Executants:**

  
\_\_\_\_\_  
Nabeela  
CNIC No. 15602-9903665-4  
Cell. 03493945544-----03419750043

**ACCEPTED BY:**

  
\_\_\_\_\_  
**SABIR SHAH,**  
Advocate Supreme Court

  
\_\_\_\_\_  
**FALAK NAZ KHAN**  
Advocate High Court

  
\_\_\_\_\_  
**JAMAL SHAH**  
Advocate High Court