

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

Service Appeal No. 5804/2020

BEFORE: MRS. ROZINA REHMAN ... MEMBER(J)  
MISS FAREEHA PAUL ... MEMBER(E)

Syed Anwar, Ex-Assistant (BPS-16), Directorate General  
Information and Public Relations, Khyber Pakhtunkhwa,  
Peshawar. .... (*Appellant*)

Versus

1. Chief Secretary Government of Khyber Pakhtunkhwa, Peshawar.\
2. Secretary Information and Public Relations, Government of Khyber  
Pakhtunkhwa, Peshawar.
3. Director General Information and Public Relations, Khyber  
Pakhtunkhwa, Peshawar.  
.... (*Respondents*)

Miss Naila Jan,  
Advocate ... For appellant

Mr. Muhammad Adeel Butt,  
Additional Advocate General ... For respondents

Date of Institution.....18.05.2020  
Date of Hearing.....07.11.2022  
Date of Decision..... 07.11.2022

**JUDGEMENT**

**FAREEHA PAUL, MEMBER (E):** The service appeal in hand has  
been instituted under Section 4 of the Khyber Pakhtunkhwa Service

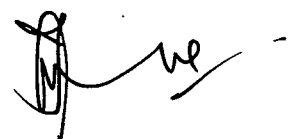


Tribunal Act, 1974 against the order dated 07.01.2020 whereby the appellant was removed from service, against which his departmental appeal was not decided within the statutory period of ninety days.

2. Brief facts of the case, as given in the memorandum of appeal, are that the appellant was serving as Assistant (BPS-16) in the respondent department. He was served with a show cause notice containing some allegations which were replied by the appellant by negating the same. An FIR was also registered against him and when he came to know about the same, he got bail from the court of competent jurisdiction. To his utter surprise, the appellant was removed from service without issuing any charge sheet and conducting regular inquiry or affording an opportunity to defend himself. Feeling aggrieved from the impugned order of removal from service dated 07.01.2020, the appellant filed a departmental appeal before the Secretary Information Department, Khyber Pakhtunkhwa (respondent No. 2) but despite the expiry of statutory period of ninety days, the appeal was not decided; hence the instant service appeal.

3. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned Additional Advocate General for the respondents and perused the case file with connected documents in detail.

4. Learned counsel for the appellant contended that the impugned order was against the law, rules and principle of natural justice. She further contended that a fact finding inquiry had been shown to be conducted



against the appellant but in fact no such inquiry had been conducted. She stated that no charge sheet/statement of allegations was issued to the appellant and no opportunity of defence was provided to him. She further stated that no statement of any witness was recorded nor any opportunity of cross examination was provided to him. She further contended that the competent authority, without waiting for outcome of the trial, issued the impugned order. Learned counsel further provided the judgment dated 20.02.2021 of Judicial Magistrate-VIII Peshawar through which the appellant had been acquitted of the charges framed against him in case FIR No. 412 dated 05.12.2018 u/s 419-420-468-471-109 PPC P.S Gulberg, Peshawar.

5. The learned Additional Advocate General, on the other hand, contended that since his appointment, the appellant never performed his official obligations with honesty and dedication. He stated that entire service of the appellant was full of his unruly conduct which include absence from duty, misbehavior, use of abusive language with media persons and office colleagues. He remained involved in impersonation as well as anti-state activities. The learned AAG presented the entire record of conduct of the appellant before the Bench which had also been annexed with the reply. As far as departmental appeal of the appellant was concerned, the learned AAG invited attention of the Tribunal to an order dated 03.07.2020 of appellate authority through which major penalty of removal from service had been confirmed upon the accused official.



6. After hearing the arguments and going through the record available before us, it is clear that the appellant while appointed as Assistant in the Information Department indulged himself in activities that were not acceptable to his higher authorities. Record presented before us indicates various posts uploaded by him on social media on his account which was a breach of code of conduct for a civil servant. Record further provides reports of his higher authorities on his absence from duty on numerous days, explanations on account of low performance, rude behavior and abusive language and also an advice issued to him on his frequent absence from duty as well as treatment of his willful absence as leave without pay. Three inquiries conducted against him are available on record produced before us. One of the inquiries was on use of abusive language against some reporters, rude behavior with his incharge officer and frequent absence from duty on completion of which he was issued a censure. Another inquiry was conducted on the charges of aggrandizement as he was found claiming to be the PRO to Chief Minister Khyber Pakhtunkhwa, on social media. Record indicates that he was issued a show cause notice on indulging himself in political activities and delivering provoking public statements and posts against the state institutions on social media, for which he submitted an affidavit (Bayan-e-Halfi) that he would be respectful to the state institutions and would not indulge in political activities or anti-state activities in future. Third inquiry was conducted on charges of impersonation during competitive examination for the post of Tehsildar/Naib Tehsildar in Board of Revenue. It was as a result of the last





inquiry that the appellant was removed from service. Perusal of show cause notice dated 06.12.2019 reveals that competent authority of the appellant was satisfied that he had committed the acts/omissions which resulted in issuing of that specific show cause notice. It stated as follows:-

*"I am satisfied that you have committed the following acts/omission specified in Rule 3 of the specified rules:-*

*That as per inquiry conducted by the Khyber Pakhtunkhwa Public Commission, you have rendered yourself guilty of misconduct by committing the illegal act of impersonation during the competitive examination conducted by the KPPSC for the post of Tehsildar/Naib Tehsildar from December 4-8, 2018 wherein you were found present in the Examination Centre at Government Higher Secondary School No. 3 Peshawar Cantt on the first day of the exam during the English paper appearing in place of Hazrat Noor S/O Jannat Noor Roll No. 1700 (the candidate) and an FIR No. 412 dated 04.12.2018 was registered against you and the co-accused by the Police Station Gulberg Peshawar."*

7. Removal order dated 07.01.2020 mentions about the charge sheet, evidence on record, reply of the accused official as well as previous record, which resulted in his removal from service. Although the appellant has submitted in his service appeal that his departmental appeal dated 23.01.2020 has not been responded but an appellate order dated 03.07.2020 is available with the reply which states as follows:-

*"3. AND WHEREAS, the appellate authority heard the ex-official in person and also perused the record on file. During the hearing, he did not put before any new defence rather requested to withhold the*



*proceedings on the plea that the case is subjudice in the court of law. He further requested for yet another chance to mend his ways and would restrain from such illegal acts in future.*

*4. AND WHEREAS, the representative of Directorate General Information and PRs further produced fresh posts of the ex-official on the same lines which testifies that he is not mending his ways rather finding lame excuses.*

*5. AND WHEREAS, the stance of the ex-official that the matter is subjudice, is not tenable as the court is looking after the criminal aspect of the matter, whereas, the instant case is of disciplinary nature under Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules, 2011.*


8. After going through the above mentioned process, the appellate authority confirmed the major penalty of removal from service on the appellant. An important point to be considered here is that there is difference in the show cause notice and the removal order. If the show cause notice is taken into consideration, one must look into the order of the judicial Magistrate-VIII Peshawar dated 20.02.2021 which has acquitted the appellant from charges in case FIR No. 412 dated 05.12.2018 u/s 419-420-468-471-109 PPC of P.S Gulberg Peshawar based on insufficient and trembling evidence. If the show cause notice is silent on the participation of the appellant in political activities and posting provocative statements on his social media account, how can the appellate authority awarded him any punishment on that account? It seems there is disjoint in the show cause notice and the appellate order. The charges on




which show cause notice was issued have been set aside vide judgment dated 20.02.2021 of Judicial Magistrate-VIII Peshawar.

9. In view of the above, the appeal in hand is allowed as prayed for. Parties are left to bear their own costs. Consign.

10. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 07<sup>th</sup> day of November, 2022.*

  
(ROZINA REHMAN)  
Member (J)


  
(FARLEHA PAUL)  
Member (E)

**Service Appeal No. 5805/2020**

Miss Naila Jan, Advocate for appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present. Arguments heard and record perused.

02. Vide our detailed judgement containing 07 pages, we considered that there is difference in the show cause notice and the removal order. If the show cause notice is taken into consideration, one must look into the order of the judicial Magistrate-VIII Peshawar dated 20.02.2021 which has acquitted the appellant from charges in case FIR No. 412 dated 05.12.2018 u/s 419-420-468-471-109 PPC of P.S Gulberg Peshawar based on insufficient and trembling evidence. If the show cause notice is silent on the participation of the appellant in political activities and posting provocative statements on his social media account, how can the appellate authority awarded him any punishment on that account? It seems there is disjoint in the show cause notice and the appellate order. The charges on which show cause notice was issued have been set aside vide judgment dated 20.02.2021 of Judicial Magistrate-VIII Peshawar. In view of the above, the appeal in hand is allowed as prayed for. Parties are left to bear their own costs. Consign.

03. *Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 07<sup>th</sup> day of November, 2022.*

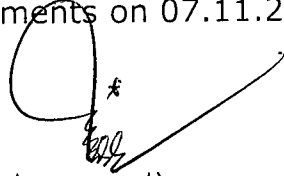
  
(ROZINA REHMAN)  
Member (J)

  
(FAREEHA PAUL)  
Member (E)

11.10.2022

Appellant alongwith his counsel present. Mr. Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant sought short adjournment for preparation of arguments. Adjourned. To come up for arguments on 07.11.2022 before the D.B.




(Mian Muhammad)  
Member (E)



(Salah-Ud-Din)  
Member (J)

25.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 20.05.2022 for the same as before.

  
Reader


20.05.2022

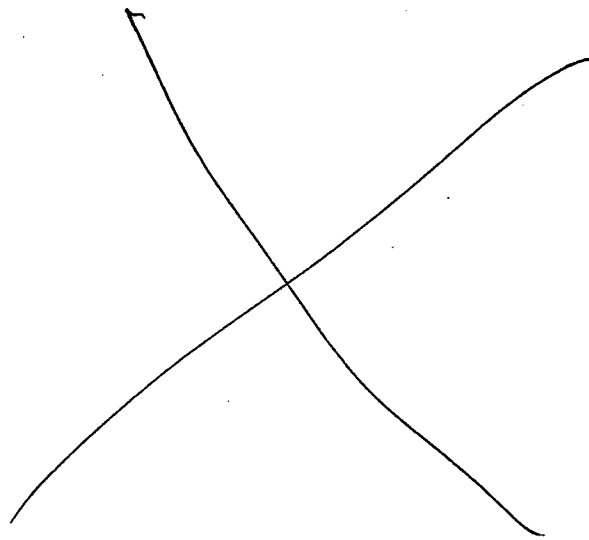
Learned counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that she has not made preparation of the appeal. Adjourned. To come up for arguments on 01.07.2022 before the D.B.

  
(Rozina Rehman)  
Member (J)

  
(Salah-Ud-Din)  
Member (J)



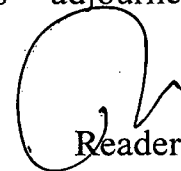
01.07.2022

Bench is not available, therefore, case is adjourned to 11.10.2022 for the same as before.

  
Reader

30.04.2021

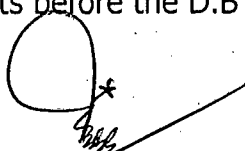
Due to demise of the Worthy Chairman, the Tribunal is non-functional, therefore, case is adjourned to 26.08.2021 for the same as before.


  
Reader

26.08.2021

Appellant present. Mr. Muhammad Rashid, DDA for respondents present.

Appellant requested for adjournment on the ground that his counsel is admitted in hospital due to illness. Adjourned. To come up for arguments before the D.B on 28.10.2021.

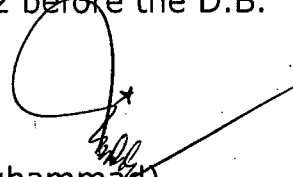
  
(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)

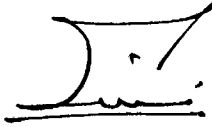
  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

28.10.2021

Appellant in person present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Appellant seeks adjournment on the ground that his counsel is ill today. Adjourned. To come up for arguments on 25.02.2022 before the D.B.

  
(Mian Muhammad)  
Member (E)

  
(Salah-Ud-Din)  
Member (J)

05.11.2020

Nemo for the appellant. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Amjid Ali Shah, Director (Litigation) for the respondents are also present.

Written reply on behalf of respondents not submitted. Representative of the department is seeking further time for submission of written reply/comments, time given. File to come up for written reply/comments on 30.12.2020 before S.B.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

30.12.2020

Counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Amjid Ali Shah, Director (Litigation) for the respondents present.

Representative of the respondents submitted written reply/comments which is placed on file.

Adjourned to 02.04.2021 for rejoinder and arguments before D.B.


  
(Mian Muhammad)  
Member(E)


02.04.2021

Learned counsel for the appellant present.

Mr. Kabirullah Khattak, learned Additional Advocate General alongwith Amjid Ali Shah Deputy Director for respondents present.

Former requests for adjournment; granted. To come up for arguments on 30/4/2021 before D.B.

  
(Atiq Ur Rehman Wazir)  
Member (E)

  
(Rozina Rehman)  
Member (J)




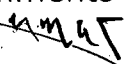
20.07.2020

Counsel for the appellant and appellant himself are present. Preliminary arguments heard. Learned counsel for the appellant submitted that the appellant was serving as Assistant (BPS-16) in the respondent-department, he was served with show-cause notice with statement of allegations on the basis of a false FIR registered against him, he was removed from service without issuing any charge sheet or conducting regular inquiry or affording him to defend himself vide the impugned order being passed on 07.01.2020. He challenged the assailed order to be against the law, rules, and the principles of natural justice as void ab-initio and liable to be set-aside.

As regards the involvement of period of limitation, he submitted that due to late receipt of impugned order he could not move appeal within the stipulated period as he is mailing from a far flung District of North Waziristan of the merged area where the ordinary dock/post consume much time in reaching its destination on the one hand, and the lock down due to spread of COVID-19 on the other.

The points raised need consideration, therefore, admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments. To come up for written reply/comments on 18.09.2020 before S.B.

  
Appellant Deposited  
Security & Process Fee

  
(MUHAMMAD JAMAL KHAN)  
MEMBER

18.09.2020

Junior to counsel for the appellant and Addl. AG alongwith Amjad Ali Shah DD for the respondents present.

Representative of the respondents seeks time to submit reply/comments. Adjourned to 05.11.2020 on which date the requisite reply/comments shall positively be furnished.

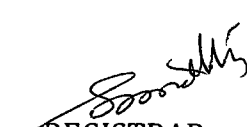

  
Chairman

Form- A

FORM OF ORDER SHEET

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

Case No.- 5804 /2020


1S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/06/2020	<p>The appeal of Syed Anwar resubmitted today by Naila Jan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>20/07/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

The appeal of Syed Anwar Ex-Assistant received today i.e. 18.05.2020 by Naila Jan, Advocate is incomplete on the following score which is returned to his counsel for completion and resubmission within 15 days.


- 1- Copy of annexure A is illegible which may be replaced by legible one.
- 2- In Para-3 of Memo of appeal copy of FIR and court order are mentioned as annexure C & D are not attached with file, which may be place on it.
- 3- Departmental appeal mentioned In para-5 of the facts is not attached with appeal which may attached.
- 4- Annexures are not flagged which may be flagged.
- 5- Annexures of the appeal are not attested which may be attested.
- 6- 3 more copies of appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1154 /S.T,

Dt. 18-05 /2020

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Naila Jan Adv, Peshawar.

Resubmitted by  
Naila Jan advised  
Reviewed all the objections.  
  
18/05/2020

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

Service Appeal No: 5904 /2020

Syed Anwar

**VERSUS**

Chief Secretary Government of KPK & Others


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Dated: 18/05/2020

  
Appellant

Through

  
Naila Jan  
Advocate, High Court  
Peshawar.

D

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

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 3829

Dated 18-5-20

Appeal No. 5804/2020

Syed Anwar Ex - Assistant (BPS-16) Directorate General  
Information & PRs, Khyber Pakhtunkhwa, Peshawar.

-----**(Appellant)**

**VERSUS**

1. Chief Secretary Govt; of KPK Peshawar.
2. Secretary Information and PRS Govt; of KP Peshawar.
3. Director General Information and Public Relations  
Khyber Pakhtunkhwa.

-----**(Respondents).**

**APPEAL U/S 4 OF KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL ACT -1974 AGAINST  
THE IMPUGNED ORDER DATED 07/01/2020  
WHEREBY THE APPELLANT HAS BEEN  
REMOVED FROM SERVICE AND NON  
DISPOSAL OF THE DEPARTMENTAL APPEAL  
OF THE APPELLANT AFTER EXPIRY OF THE  
STATUTORY PERIOD OF 90 DAYS.**

P. 15

P. 16

ntw

Filed to-day

*[Signature]*  
Registrar  
18/5/2020.

**PRAYER IN APPEAL:-**

Re-submitted to-day  
and filed.

*[Signature]*  
Registrar

**ON ACCEPTANCE OF THIS  
SERVICE APPEAL THE IMPUGNED  
ORDER DATED 07/01/2020 MAY  
KINDLY BE SET ASIDE AND**

2

**REINSTATED INTO SERVICE WITH  
ALL BACK BENEFITS.**

**Respectfully Sheweth;**

*Appellant submits as under*

1. That the appellant was serving as Assistant  
(BPS-16) in the respondents department and  
since his appointment the appellant served the  
department with great zest, zeal and  
enthusiasm.
  
2. That while serving in the same capacity, the  
appellant was served with show cause notice,  
containing some baseless allegations, which  
was replied by the appellant negating the  
same. (Copy of show-cause notice and reply  
are attached as annexure "A" & "B").
  
3. That a concocted and false FIR was also  
registered against the appellant and when the  
appellant came to know about the same the  
appellant got bail from the court of competent  
jurisdiction. (Copy of the FIR and court order  
are attached as annexure "C" & "D")



4. That the utter surprise of the appellant, the appellant was removed under the law of jungle, without issuing any charge sheet or conducting regular inquiry or affording an opportunity to defend himself. (Copy of the impugned order is attached as annexure "E").
  
5. That feeling aggrieved from the impugned order, the appellant filed a departmental appeal before Respondent No.2 however, despite the expiry of statutory period of 90 days, the respondent No.2 failed to decide the departmental appeal of the appellant, hence filing the instant appeal on the following grounds inter-alia:- (Copy of the Departmental appeal is annexure "F")

**GROUND:**

- A. That the impugned order is against the law, rules and principle of natural justice, void ab-initio, hence liable to be set aside.

B. That though a fact finding inquiry has been shown to be conducted against the appellant however no such inquiry has been conducted.

It is worth mentioning that fact finding inquiry has no where mentioned in E & D rules 2011 or in any other laws.

C. That no charge sheet alongwith statement of allegation was issued, nor did opportunity of defense has been provided to the appellant.

D. That no regular inquiry has been conducted which is mandatory before awarding major penalty.

E. That no statement of any witness was recorded nor opportunity of cross - examination has been provided to the appellant.

F. That though FIR was registered against the appellant however, the competent authority, without waiting for outcome of the trial,



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issued the impugned order in a cursory  
manner.

G. That the allegations leveled against the appellant are false, frivolous and based on malafide and there is no single piece of evidence against the appellant.

H. That the frivolous allegations were required probe however no such probe was conducted nor did the appellant was confronted with anything.

I. That right of fair trial has not been provided to the appellant as guaranteed by Article 10-A of the constitution of Islamic Republic of Pakistan, 1973.

J. That no opportunity of personal hearing has been provided which is evident from the impugned order.

al K

6

K. That since the impugned order, the appellant is jobless.

L. That the appellant has not been treated in accordance with Article 25 of the constitution of Islamic Republic of Pakistan, 1973.

M. That the respondents failed to perform their duties by not deciding a departmental appeal of the appellant.


N. That the appellant may kindly be allowed to adduce any other ground during the course of arguments.

*It is, therefore, most humbly prayed that on acceptance of this service appeal may kindly be accepted as prayed for in the heading of the appeal.*

Dated: 18/05/2020.

  
Appellant

Through

  
Naila Jan  
Advocate, High Court  
Peshawar.

7

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

Service Appeal No: \_\_\_\_\_/2020

Syed Anwar

**VERSUS**


Chief Secretary Government of KPK & Others.

**AFFIDAVIT**


I, Syed Anwar Ex - Assistant (BPS-16) Directorate General Information & PRs, Khyber Pakhtunkhwa, Peshawar, do hereby solemnly affirm and declare that all the contents of the application for condonation of delay are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

  
**DEPONENT**

**IDENTIFIED BY:**

  
**NAILA JAN**  
Advocate, High Court  
Peshawar.

**ATTESTED**  
IRFAN ULLAH ADVOCATE  
NOTARY PUBLIC

  
18-05-2020

8

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

Service Appeal No: \_\_\_\_\_/2020

Syed Anwar

**VERSUS**

Chief Secretary Government of KPK & Others

**ADDRESSES OF PARTIES**

**APPELLANT.**

Syed Anwar Ex - Assistant (BPS-16) Directorate General  
Information & PRs, Khyber Pakhtunkhwa, Peshawar

**ADDRESSES OF RESPONDENTS**


1. Chief Secretary Govt; of KPK Peshawar.
2. Secretary Information and PRS Govt; of KP Peshawar.
3. Director General Information and Public Relations  
Khyber Pakhtunkhwa

Dated: 18/05/2020



Appellant

Through

  
Naila Jan  
Advocate, High Court  
Peshawar.



9  
Amir 'A' <sup>5/12</sup>

**DIRECTORATE GENERAL INFORMATION & P.R.  
KHYBER PAKHTUNKHWA, PESHAWAR**

**SHOW CAUSE NOTICE**

I, Imdad Ullah, Director General Information & P.Rs, Khyber Pakhtunkhwa as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby serve you, Syed Anwar Assistant, Directorate General Information & P.Rs, Khyber Pakhtunkhwa as follows:

I am satisfied that you have committed the following act/omission specified in Rule-3 of the specified rules -

"That as per inquiry conducted by the Director Peshawar Public Commission you have rendered yourself guilty of misconduct by committing the legal act of impersonation during the competitive examination conducted by the KPSC for the post of Tehsildar/Naib Tehsildar from December 4-8 2018 wherein you were found present in the Examination Centre at Government Higher Secondary School No 3 Peshawar Cantt on the first day of the exam during the English paper appearing in place of Hadrat Noor SO Jannat Noor Rd No. 1700 (the candidate) and an F.R No 412 dated 04-12-2018 was registered against you and the co-accused by the Police Station, Gulberg Peshawar"

2 In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority, dispense with the inquiry and serve you with a Show Cause Notice under Rule-7 of the Ibrd Rules

3 As a result thereof, I, as competent authority, have tentatively decided to impose upon you the major penalty under Rule-4 (1) (B) iii of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 -

a. Removal from Service

4 You are, therefore, required to show cause as to why the aforesaid penalty/penalties should not be imposed upon you and also intimate whether you desire to be heard in person

5 If no reply to this notice is received within seven (07) days or not more than fifteen (15) days of its delivery, it shall be presumed that you are not desirous to be heard and in that case an ex-parte action shall be taken against you.

Syed Anwar  
Assistant (BS-16)  
Directorate General Information & P.Rs

2/12/18  
WEST  
ATTESTED  
GENERAL  
P.Rs  
PESHAWAR

To,

10  
Amir B

The Director General  
Information & PRs  
Khyber Pakhtunkhwa

SUBJECT: REPLY OF THE SHOW CAUSE NOTICE DATED  
08-12-2019.

Respected Sir,

In reference of your show cause notice date 08-12-2019, it is revealed to the undersign vide narration and contents of the show cause notice that on the strength of the allegedly registered FIR bearing No 412 dated 04-12-2018 under section "mum" police station Gulberg Peshawar, shown to be registered against the under sign in the manner precisely elaborated in the paragraph of the show cause; the notice served to show cause with the contention that why the major penalty under specific provision of applicable Law i.e. KP Govt Servant (efficiency & discipline) Rules, 2011, may not initiate for removal from service.

It is added herein that the drama sketched therein the contents of the FIR against the undersign is concocted, fictitious, having no legal footing at all, it was thus when got information about the same, the bail petition was rush to preferred before the competent court of criminal jurisdiction and eventually bail was please to grant by Hon'ble

COURT.(copy of the said order can be produced during the opportunity of personal hearing if so please to approve by your majesty)

Actually & **firstly**, mere registration of the FIR under any offence even on alleged basis, is fatal to proves the guilt of the nomination therein and it has also settled by the worthy apex courts of Pakistan that no one can be punished, mere on the allegations itself. **Secondly** in absence of any court order, regarding held convicted in the criminal case, the status of the accused always leads privileges of any penalty what so ever, hence the show cause so served is *infructuous* in nature therefore liable to be recalled. However to the extent of further plea of personal hearing, yes it must be availed, to clear very shadow of the letter.

**PARYER:**

It is thus concluded that the served show cause notice 08-12-2019 may graciously please be recalled and any action or in-action in the matter of the registration of FIR may placed subject to the final *fate* through court.

Saeed Anwar

Assistant (PBS-16)

Director General Information & PRs Khyber Pakhtunkhwa

*Saeed*  
ATTESTED

ابتدائی اطلاع رپورٹ

5918-5918-30  
5918-5918-30

ابتدائی اطلاع نمبر جرم قابل دست اندازی پولیس رپورٹ نمبر 153 نمبر سائبر قاعدہ

غلط	412
غلط	412
تاریخ و وقت رپورٹ	12 مارچ 2018
مقام و کیفیت جرم (معدومہ) حال اگر کچھ پایا گیا ہو۔	پشاور
جائے وقوعہ حاصل تھانہ سے اور سمت	GHSH NO3 Cantt
نام و کونٹیکٹ نمبر (معدومہ) حال اگر کچھ پایا گیا ہو۔	پشاور
کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا تو وجہ بیان کرنا	پشاور
تھانہ سے روانگی کی تاریخ و وقت	پشاور

ابتدائی اطلاع کے درج کردہ

The SHO Gujjar Khan, Peshawar, reported that on 12/03/2018 at about 1:30 PM at GHSH NO3 Peshawar Cantt. during Examination conducted by Khyber Pakhtunkhwa Public Service Commission for the Post of Tehsil Daraz, a fake candidate was caught red handed by the investigating staff during a General English Paper instead of Roll No. 1700 number of MHA Hajrat near Hayat Abil Peshawar (copy attached). The fake candidate was immediately handed over to the Police Station Gujjar Khan. The accused did not disclose his identity and in his possession. The case is forwarded for legal action under Section 419, 20-468 as per law. Kindly investigate the accused actual name, whereabouts & inform the Chairman, Khyber Pakhtunkhwa Public Service Commission, Peshawar at the case and take action as per law. GHSH NO3 Peshawar

پشاور پولیس سٹیشن میں گرفتار کیا گیا۔ اس کا نام اور پتہ نامعلوم ہے۔ اس کی شناخت کے لیے تفتیش کی جا رہی ہے۔

ASD Peshawar  
ASD-PS-GB  
5-12-018

Phase No. Hayat Abil Peshawar attached. The fake candidate was immediately handed over the police



Handwritten notes in Urdu script at the top of the page.

Signature of a police officer and a stamp that reads "SITINGMAN" and "VILL.".

412

NR  
07-12-18 PO is on leave file  
to come up on 08-12-18

N.P  
8/12/18 PO is on leave file  
to come up on 10-12-18

ORDER-02  
10-12-2018

SPP Sarfaraz Advocate for state while counsel for accused/petitioner present. Complainant also present. Record received.

Through the instant application the accused/petitioner namely Said Anwar s/o Mir Khanan has sought his post arrest bail in case FIR No. 412 dated 05/12/2018 registered u/s 419/420/468/471 PPC of PS Gulberg.

Signature on the left side of the typed text.

PAGE 2 OF 2

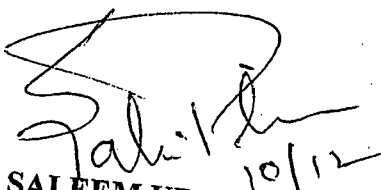
Arguments heard and case file perused.

Perusal of the record reveals that the accused/petitioner is arrested and booked for an offence of cheating and impersonation for taking examination as a fake candidate instead of a candidate with name Hazrat Noor s/o Jannat Noor and was caught red handed during Exam of Tehsildar. The punishment provided for the offence does not fall within the prohibitory clause. The accused is also not required for further investigation. The accused has not confessed nor admitted his guilt. The case against accused/petitioner therefore falls within the ambit of further inquiry. Reliance placed on **PLD 2017 SC 733**.

In view of above, the application of the accused/petitioner is hereby accepted and he is ordered to be released on bail subject to furnish bail bonds in sum of **Rs: 50,000/- (Fifty Thousand) with two sureties** each in the like amount to the satisfaction of this Court. Sureties must be local and reliable.

Copy of this order be placed on case record, while file of this Court be consigned to the Record Room after necessary completion.

**ANNOUNCED**  
10/12/2018

  
10/12  
**SALEEM UR RAHMAN**  
Judicial Magistrate-VIII, Peshawar



DIRECTORATE GENERAL INFORMATION & PRs  
KHYBER PAKHTUNKHWA PESHAWAR  
No. INF/ESTT/1-28/129-36  
Dated Peshawar Dis. 7/1/2019

OFFICE ORDER

WHEREAS, Mr. Syed Anwar s/o Mir Khanan, Assistant (BPS-16), Directorate General Information & PRs, Khyber Pakhtunkhwa was proceeded against under the Khyber Pakhtunkhwa, Government Servant (Efficiency and Discipline) Rules, 2011 on the charges mentioned in the Show Cause Notice.

2. NOW, THEREFORE, I, Imdadullah as the Competent Authority (Director General, Information and PRs, Khyber Pakhtunkhwa), after having considered the charges, evidence on record, reply of the accused official as well as previous record, in exercise of powers conferred under Rule 7 (f) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 have imposed the major penalty of "Removal from Service" upon Syed Anwar, Assistant (BPS-16).

-Sd/-

DIRECTOR GENERAL  
INFORMATION & PUBLIC RELATIONS,  
KHYBER PAKHTUNKHWA  
Dated Peshawar, the 7/1/2019

Endst: No. INF/Estt:/1-28/129-36

Copy forward to the:

1. Accountant General, Khyber Pakhtunkhwa
2. PS to Secretary Information & PRs, Govt. of Khyber Pakhtunkhwa
3. PS to Director General Information & PRs, Khyber Pakhtunkhwa
4. Section Officer (Establishment), Information & PRs Department, Govt. of Khyber Pakhtunkhwa
5. Syed Anwar, Village land Syedabad, Tehsil Datta Khel, Miran Shah, North Waziristan
6. Bill Clerk
- ✓ 7. Personal file of the official
8. Office Order file

*Basim Arshad*  
DIRECTOR INFORMATION  
FOR DIRECTOR GENERAL

*1/1/19*  
*N/A*

16

Amir F

To

The Secretary Information  
Government of Khyber Pakhtunkhwa  
Peshawar

Subject:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 07/01/2020 WHEREBY THE APPELLANT HAS BEEN REMOVED ILLEGALLY FROM SERVICE.

Prayer:

*On acceptance of the instant departmental appeal, the appellant may kindly be reinstated into service with all back benefit by setting aside the impugned order dated 07/01/2020*

Respected Sir,

*The appellant submits as under;*

1. That the appellant was serving as Assistant (BPS-16) in your departmental and since his appointment the appellant served the department with great zest, zeal and enthusiasm.
2. That while serving in the same capacity, the appellant was served with a show cause notice, containing some baseless allegations, which was replied by the appellant negating the same. **(Copy of show cause notice and reply are attached as annexure "A" & "B").**
3. That a concocted and false FIR was also registered against the appellant and when the appellant came to know about the same the appellant got bail him the court of competent

APPROVED

jurisdiction. **(Copy of the FIR and court order are attached as annexure C & D)**

4. That, the utter surprise of the appellant, the appellant was removed under the law of jungle, without issuing any charge sheet or conducting regular inquiry or affording an opportunity to defend himself, **(Copy of the impugned order is attached as annexure E)**

5. That the appellant, having no other adequate remedy, hence filling the instant appeal on the following grounds:

**GROUND S:**

A. That the impugned order is against the law, rules principles of Natural Justice, void ab-initio, hence liable to be set aside.

B. That though fact finding inquiry has been shown to be conducted against the appellant however no such inquiry has been conducted. It is worth mentioning that fact finding inquiry has no where mentioned in E & D rules 2011 or in any other laws.

C. That no charge sheet alongwith statement of allegation was issued, nor did opportunity of defence has been provided to the appellant.

19/12/2011  
APPEALS

12

- D. That no regular inquiry has been conducted which is mandatory before awarding major penalty.
- E. That no statement of any witness was recorded nor opportunity of cross has been provided to the appellant.
- F. That though FIR was registered against the appellant however the competent authority, without waiting for outcome of the trial, issued the impugned order in a cursory manner.
- G. That the allegations leveled against the appellant are false, frivolous and based on malafide and that is no single piece of evidence against the appellant.
- H. That the frivolous allegations were required probe however no such probe was conducted nor did the appellant was confronted with anything.
- I. That right of fair trial has not been provided to the appellant as guaranteed by Article 10-A of the constitution of Islamic Republic of Pakistan, 1973.
- J. That no opportunity of personal hearing has been provided which is evident from the impugned order.
- K. That since the impugned order the appellant is jobless.

ATTESTED

L. That the appellant has not been treated in accordance with Article 25 of the constitution of Islamic republic of Pakistan, 1973.

It is, therefore, most humbly prayed that on acceptance of this departmental appeal may kindly be accepted as prayed for in the heading of the appeal

Applicant

  
**Syed Anwar**

**Assistant (BPS 16)**

  
**ATTESTED**

وکالت نامہ

عدالت لپ سروس ٹریڈ مارل فشنوار

سید انور بنام صلوات

منجانب: سید انور تاریخ 18/05/2020

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی وجوہد ہی بمقام لپ سروس کے لیے ہے۔

نانکہ جان ایڈوکیٹ ہائی کورٹ

کو بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رو بروئے عدالت حاضر ہوتا رہوں گا اور ہونگی اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کرونگا اگر پیشی پر من مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے کسی اور جگہ سماعت ہونے پر من مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا اختیار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداختہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد ثالثی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا طرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادا ہوگی علیحدہ مختیار نامہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں نیز ایسے مشیر قانون کو ہر امر میں وہی اور ایسے ہی اختیارات حاصل ہوں گے جیسے کہ صاحب موصوف کو حاصل ہیں اور پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختیار نامہ لکھ دیا تاکہ سند رہے۔ مورخہ 18/05/2020۔ مضمون مختیار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

ATTESTED & ACCEPTED

[Signature]

نانکہ جان ایڈوکیٹ پشاور ہائی کورٹ پشاور

[Signature]

سید انور (سید انور)





GOVERNMENT OF KHYBER PAKHTUNKHWA  
INFORMATION & PUBLIC RELATIONS  
DEPARTMENT

Dated Peshawar the 3<sup>rd</sup> July, 2020

**OFFICE ORDER**

**No.SO.Estt:(INF)4-115/Inquiry/2018:** Whereas Mr. Syed Anwar, Ex- Assistant of the Directorate General Information & Public Relations, Khyber Pakhtunkhwa was proceeded under the Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules, 2011 by the Directorate General Information & PRs and major penalty of removal from service has been imposed upon the above said official.

2. **AND WHEREAS**, the Ex-official preferred an appeal to the appellate authority against the said penalty.

3. **AND WHEREAS**, the appellate authority heard the ex-official in person and also perused the record on file. During the hearing, he did not put before any new defense rather requested to withhold the proceedings on the plea that the case is subjudice in the court of law. He further requested for yet another chance to mend his ways and would restrain from such illegal acts in future.

4. **AND WHEREAS**, the representative of Directorate General Information & PRs further produced fresh posts of the ex-official on the same lines which testifies that he is not mending his ways rather finding lame excuses.

5. **AND WHEREAS**, the stance of the ex-official that the matter is subjudice, is not tenable as the court is looking after the criminal aspect of the matter, whereas, the instant case is of disciplinary nature under Khyber Pakhtunkhwa Civil Servants (Efficiency & Discipline) Rules, 2011.

6. **NOW THEREFORE**, I, in capacity of the Appellate Authority, after having perused the record, explanation of the accused official and hearing him in person, and in exercise of powers under Rule (5) (1) (c) of the Khyber Pakhtunkhwa Civil Servants (Appeal) Rules, 1986, am pleased to confirm the major penalty of removal from service upon the accused official by the Directorate General Information & PRs.

-sd-


SECRETARY  
GOVT. OF KHYBER PAKHTUNKHWA,  
INFORMATION & PUBLIC RELATIONS DEPARTMENT

**Endst: No. SO.Estt:(INF)4-115/2018**

Dated Peshawar the 3<sup>rd</sup> July, 2020

Copy of the above is forwarded to the :-

1. Director General, Directorate General Information & Public Relations Khyber Pakhtunkhwa w/r to his letter No. INF/Estt:/PF/1779 dated 15<sup>th</sup> June, 2020.
2. P.S to Secretary to Govt. of Khyber Pakhtunkhwa, Information & P.Rs Department.
3. Mr. Syed Anwar, Ex- Assistant of the Directorate General Information & Public Relations, Khyber Pakhtunkhwa.

  
SECTION OFFICER (ESTABLISHMENT)

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

**Re: APPEAL No. 5804/2020**

Syed Anwar, Ex-Assistant (BPS-16),

Directorate General Information & PRs, Khyber Pakhtunkhwa.....Appellant

**...VERSUS...**

1. Chief Secretary, Govt. of Khyber Pakhtunkhwa, Peshawar
2. Secretary Information & PRs, Govt. of Khyber Pakhtunkhwa, Peshawar
3. Director General Information & Public Relations, Khyber Pakhtunkhwa.....Respondents

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**DEPONENTS**

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

**Re: APPEAL No. 5804/2020**

Syed Anwar, Ex-Assistant (BPS-16),

Directorate General Information & PRs, Khyber Pakhtunkhwa.....**Appellant**

**...VERSUS...**

1. Chief Secretary, Govt. of Khyber Pakhtunkhwa, Peshawar
2. Secretary Information & PRs, Govt. of Khyber Pakhtunkhwa, Peshawar
3. Director General Information & Public Relations, Khyber Pakhtunkhwa

..... **Respondents**

**AFFIDAVIT**

I Mr. Mian Amjad Ali Shah, Deputy Director (Litigation) Peshawar. Do hereby solemnly affirm and declare on oath that the contents Additional Department are true and correct into the best of my knowledge and behalf that nothing has been concealed from the Hon'ble Court.

**DEPONENT:**



**CNIC NO:** 17301-2564582-5

**Identified by Advocate  
General, Khyber  
Pakhtunkhwa, Peshawar.**

1

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

**Re: APPEAL No. 5804/2020**

Syed Anwar, Ex-Assistant (BPS-16),  
Directorate General Information & PRs, Khyber Pakhtunkhwa.....Appellant

**...VERSUS...**

1. Chief Secretary, Govt. of Khyber Pakhtunkhwa, Peshawar
2. Secretary Information & PRs, Govt. of Khyber Pakhtunkhwa, Peshawar
3. Director General Information & Public Relations, Khyber Pakhtunkhwa... Respondents

WRITTEN REPLY ON BEHALF OF RESPONDENTS NO. 1 to 3

**PRELIMINARY OBJECTIONS**

1. That the appellant is estopped by his own conduct to file the present appeal.
2. That the appellant has not come to the tribunal with clean hands.
3. That the appellant's claim is based on misstatement to misguide the Tribunal, therefore, his appeal is liable to be dismissed.
4. That no legal right of the appellant has been infringed, therefore, the appeal is neither competent nor maintainable.

**RESPECTFULLY SHEWETH:**

**REPLY ON FACTS**

1. That Para 1 of the appeal is true to the extent that the appellant joined the Directorate General Information & PRs, Khyber Pakhtunkhwa as Assistant (BS-16) in December 2013 (**Annexure-I**). Rest of the Para is incorrect as since his appointment, he never performed his official obligations with honesty and dedication. Rather during his entire service career spanning over a period of more than six (06) years, he has proved himself as a constant source of nuisance for the Directorate as well as the Administrative Department by his unruly conduct. The appellant mostly remained absent from duty, fought with media person(s) and office colleagues, remained involved in impersonation as well as anti-state activities that earned a bad name for the department. The disciplinary actions initiated against him on numerous occasions speak volumes of his negligence and non-seriousness towards official responsibilities (Copies of the explanations called from him are enclosed as **Annexure-II**, without pay orders as **Annexure-III**, charge sheets and statement(s) of allegations as **Annexure-IV**, Inquiry reports as **Annexure-V**, Censures etc. as **Annexure-VI**, suspension order as **Annexure-VII**, and Show Cause Notices as **Annexure-VIII**).

2. That Para 2 of the appeal as drafted by the appellant is incorrect as the Show Cause Notice(s) (**Annexure-VIII**) served upon him are fully in consonance with the rules and based on undeniable facts. Every time he failed in defending the charges mentioned against him in the Show Cause Notice(s).
3. That the F.I.R No. 412 dated 04-12-2018 registered against the appellant u/s 419-420-468-471-109 at Police Station Gulberg Peshawar (**Annexure-IX**) is not false or concocted one as stated by the appellant in his appeal. The same was registered against him after he was caught red-handed by the invigilating staff in the Examination Centre at Government Higher Secondary School No. 3 Peshawar Cantt: while appearing in place of a candidate Mr. Hazrat Noor s/o Jannat Noor, Roll No. 1700 in the English Paper of the competitive examination conducted by the Khyber Pakhtunkhwa Public Service Commission for the post of Tehsildar/Naiib Tehsildar.
4. That Para-4 of the appeal is incorrect as the appellant was removed from service under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 (**Annexure-X**) after being found guilty of misconduct and following his failure to defend himself against the charges mentioned in the Show Cause Notice(s). Though a number of opportunities were provided to him to mend his ways but he failed to do so and ultimately the competent authority was having no other option but to impose upon him the major penalty of 'Removal from Service'.
5. That Para 5 of the appeal is also incorrect as the appellant in pursuance of his departmental appeal was heard in person by the Respondent No.2 i.e. the Secretary Information & PRs being the appellate authority and the major penalty of 'Removal from Service' imposed upon him by the appointing authority was confirmed vide Office Order Endst: No. SO.Estt: (INF)4-115/2018 dated 03-07-2020 (**Annexure-XI**).

**ON GROUNDS:**

- A. Ground A of the appeal as drafted by the appellant is incorrect as the office order with regard to his removal from service (**Annexure-X**) is in line with law, rules and principles of natural justice. It is the conduct of the appellant that cost him his service.
- B. Ground B of the appeal is also incorrect as an Inquiry against the appellant was conducted by a 2-member Inquiry Committee of the Khyber Pakhtunkhwa Public Service Commission wherein he

was found guilty of impersonation (Inquiry Report as **Annexure-V**).

- C. In reply to Ground C of the appeal, it is submitted that the appellant was served with a Show Cause Notice under Rule-7 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 wherein he was asked to show cause as to why the tentatively decided penalty of 'Removal from Service' should not be imposed upon him and also to intimate whether he desires to be heard in person. The appellant instead of coming for personal hearing preferred to send a written reply through his son on December 23, 2019 wherein he pleaded that the Show Cause Notice served upon him may graciously be recalled and no action be taken against him till the fate of the case through court. His son, who met the DG, was advised to tell his father to meet the competent authority and defend the charges as mentioned in the Show Cause Notice against him but he didn't turn up. He also never bothered to receive the repeated telephonic calls made on his Cell phone thus losing the opportunity to defend his case. Furthermore, despite being a Government servant he participated in political activities, delivered provoking public statements and made posts against the State institutions via social media platforms thereby rendering him guilty of misconduct (**Annexure-XII**).
- D. That the appellant has been proceeded under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 by the competent authority and removed from service after he failed to defend the charges leveled against him in the Show Cause Notice(s), which were served upon him under Rule 7 of *ibid* Rules.
- E. As Ground B and C above.
- F. As Para-4 of the reply on Facts above.
- G. Ground G of the appeal is devoid of facts as the Inquiry Report of the KPPSC in the impersonation case and documentary proofs of his participation in the political activities, delivering provoking public statements and doing posts against the State Institution

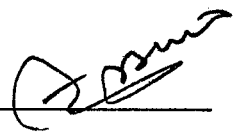
via Social Media platforms as mentioned in the Show Cause Notice(s), is sufficient and irrefutable evidence against the appellant.

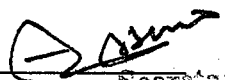
- H. As Ground G above.
- I. As Ground C above.
- J. As Ground C and G above.
- K. Ground K of the appeal pertains to appellant's personal life.
- L. As Ground A above.
- M. As Para-5 of the reply on Facts and Ground C above.

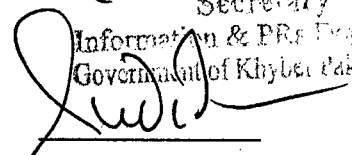
It is, therefore, most humbly prayed before this Hon'ble Tribunal to dismiss the instant appeal of the appellant with costs.

**RESPONDENTS**

1. Chief Secretary, Govt. of Khyber Pakhtunkhwa
2. Secretary to Government of Khyber Pakhtunkhwa  
Information & PRs Department
3. Director General Information & PRs  
Khyber Pakhtunkhwa

  
\_\_\_\_\_

  
\_\_\_\_\_  
Secretary  
Information & PRs Department  
Government of Khyber Pakhtunkhwa

  
\_\_\_\_\_

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①

**DIRECTOR INFORMATION  
GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR**

No.INF/Estt:/1-59/  
Dated Peshawar the \_\_\_/\_\_\_/2013

**OFFICE ORDER.**

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, the competent authority is pleased to appoint the following candidates as Assistants (BPS-14) in the Directorate of Information, Government of Khyber Pakhtunkhwa, on regular basis as per existing policy with immediate effect subject to the following terms & conditions.

S.NO.	NAME & FATHER NAME	PLACE OF DUTY
1.	Syed Sardar Badshah S/O Hassan Gul.	Headquarters Office, Peshawar.
2.	Syed Anwar S/O Mir Khanan.	Headquarters Office, Peshawar.
3.	Mr. Muhammad Zia ul Islam S/O Mian Fazli Hadi.	Regional Information Office, Swat.
4.	Mian Muhammad Ashraf S/O Mian Noorani.	Headquarters Office, Peshawar.

**TERMS AND CONDITIONS ARE AS UNDER:**

1. They will be governed by such rules and orders as may be issued from time to time by the Government of Khyber Pakhtunkhwa for the category of the Government servants which they belong.
2. If they wish to resign at any time, they will have to submit two months notice or two months salary in lieu thereof.
3. They may be posted at any station in Khyber Pakhtunkhwa.
4. Their appointments to the service shall be subject to the production of Medical Fitness Certificate from the Standing Medical Board.
5. They will be entitled to all the benefits of civil servants according to the rules.
6. They should join their posts within 30 days of the issuance of this Office Order.
7. They will be on probation for a period of one year extendable for another one year.

Sd/-

**DIRECTOR INFORMATION,  
GOVT: OF KHYBER PAKHTUNKHWA**

Endst:No.INF/Estt:/1-59/ 6833-44 Dated Peshawar, the 5/12/2013

Copy forwarded for information and necessary action to:-

1. The Accountant General, Khyber Pakhtunkhwa Peshawar.
2. The Director Recruitment, Government of Khyber Pakhtunkhwa Public Service Commission with reference to his letter No.KPK/PSC/SR-V/098260 dated 26.11.2013.
3. The Section Officer Information with reference to his letter No.SO (INF)4-115/Estt//2011-12/Vol:II dated 28.11.2013.
4. District Accounts Officer, Swat.
5. The Regional Information Officer, Regional Information Office, Swat.
6. Mr. Syed Sardar Badshah S/O Hassan Gul, Mushtaq Abad, Nothia Jadeed, GPO, Peshawar Cantt.
7. Syed Anwar S/O Mir Khanan, Village Land Syedabad North Waziristan Agency.
8. Mr. Muhammad Zia ul Islam S/O Mian Fazli Hadi, Village & P.O Madyan, Tehsil Bahrain, District Swat.
9. Mian Muhammad Ashraf S/O Mian Noorani, Village Shahiter P.O and Tehsil Balakot, District Mansehra.
10. Bill Clerks.
11. Personal Files of the Officials.
12. Office Order File.

  
**ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR**





OFFICE OF THE REGIONAL INFORMATION OFFICER,  
KOHAT REGION, KOHAT.

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NO.INF/RIO/KT/ 236

Dated Kohat, the 10/12/2018

To

The Director General Information & PRs,  
Govt. of Khyber Pakhtunkhwa, Peshawar.

Subject: ABSENCE OF SYED ANWAR, ASSISTANT FROM DUTY.

In continuation of this office letter No.INF/RIO/KT/217 Dated Kohat, the 12-11-2018 on the subject cited above.

It is once again submitted that the newly transferred Assistant Mr. Syed Anwar has not yet submitted his arrival report for duty in this office. He however, visited this office on 6<sup>th</sup> November, 2018 but not submitted his Arrival Report with the plea that he has already applied for 08 Months Earned Leave. He further stated that after getting LPC from the Headquarter office, will submit his Arrival Report, but fails to do so, till date.

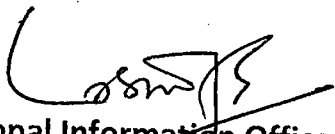
Submitted for information and necessary action, please.

AD

13/12

AE

13/12/18

  
Regional Information Officer,  
Kohat Region, Kohat

NO. 3967

DATE 13-12-18

DIRECTOR GENERAL  
INFORMATION & PUBLIC RELATIONS  
GOVT. OF KHYBER PAKHTUNKHWA



GOVERNMENT OF KHYBER PAKHTUNKHWA (4) 10  
INFORMATION & PUBLIC RELATIONS  
DEPARTMENT  
091-9223527 1648-56

No. SO.Estt: (INF)4-4/2018/KPIs  
Dated Peshawar the 10<sup>th</sup> June, 2019 (3)

To

1. Mr Said Anwar  
PRO to Minister for Mineral Development, Khyber  
Pakhtunkhwa
2. Mr Mukhtar Ahmad  
PRO to Minister for Environment, Khyber  
Pakhtunkhwa
3. Mr Habib Ullah,  
PRO to Minister for Food, Khyber Pakhtunkhwa
4. Mr Irshad Ahmad  
PRO to Minister for Revenue, Khyber Pakhtunkhwa
5. Mr Khan Ghalib  
PRO to Minister for Law, Khyber Pakhtunkhwa
6. Mr Anwar Khan  
PRO to Advisor to Chief Minister on Energy &  
Power, Khyber Pakhtunkhwa
7. Mr Riaz Ghafoor  
PRO to Advisor to Chief Minister on Merged Areas,  
Khyber Pakhtunkhwa

Subject:- EXPLANATION

From perusal of your key performance indicators (KPIs) for the month of May, 2019, the competent authority has noticed that you have earned less than thirty (30) score on the performance chart which indicates inefficiency on your part during the said period.

You are therefore called upon to explain the reasons for your low performance during the last month. Your written reply shall reach this Department within seven (07) days positively, failing which disciplinary action will be taken under the rules.

Section Officer (Establishment)

Endst: No. & Date as above.

Copy of the above is forwarded for information to the:-

1. Director General, Directorate General Information & PRs, Khyber Pakhtunkhwa.
2. Deputy Director (Communication), Directorate General Information & PRs.
3. PS to Secretary Information & PRs Department Khyber Pakhtunkhwa.

DD/CA,  
11/6/19

Section Officer (Establishment)

AE  
11/6/19



**DIRECTORATE OF INFORMATION**  
**GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR**

No. INF/Estt:/PF/ 4594  
Dated Peshawar, the 2/10/2015

To

Mr. Syed Anwar, Assistant

Subject: **EXPLANATION**

It has been reported that you on Thursday October 1, 2015 resorted to the use of abusive language on telephone against the Peshawar-based reporters of a national daily newspaper after they refused to disclose the source of a news carried by the daily with regard to local government. They guided you to adopt proper procedure for obtaining such information but you continued abusing them. Your this rowdy attitude is not only against the office decorum but has also earned a bad name for the Information department as well as the Directorate of Information.

During your entire service career spanning over one year and 10 months, you had been posted in various sections of the Directorate including the Electronic Media, IT, Transport and Advertisement etc but every time you were transferred from one section to the other after your failure to perform up to the satisfaction of the section(s) Incharge. Currently you are working in the PI Section but there too you faught with the Incharge officer some days back thus leaving a bad precedent of rudeness. Your rude behavior and unsatisfactory performance speak volumes of your non-devotion to official duty as well as disregard for office discipline.

You are hereby called upon to explain as to why disciplinary action should not be taken against you under the rules.

Your reply should reach this office within three days of the receipt of this letter.

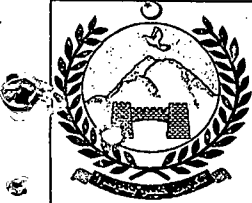
  
**ASSISTANT DIRECTOR (ADMN)**  
**FOR DIRECTOR**

Endst: No. INF/Estt:/PF 4595-36 Dated Peshawar, the 2/10/2015

Copy forwarded to:-

1. PS to Secretary Information & PRs Department, KP.
2. P.A to Director Information, KP

  
**ASSISTANT DIRECTOR (ADMN)**  
**FOR DIRECTOR**



**DIRECTORATE OF INFORMATION  
GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR**

No. INF/Estt:/PF/ 2432  
Dated Peshawar, the 22/6/2015

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To


Mr. Syed Anwar,  
Assistant

Subject: **ADVICE.**

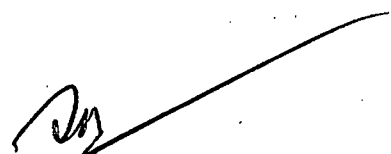
It has been observed that you take least interest in the performance of your official obligations and avail frequent leave without prior approval of the competent authority, which is against the office decorum.

You are hereby advised to be careful in future, otherwise action will be taken against you under the rules.

*ofc*  
  
**ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR**

Endst: No. INF/Estt:/PF/ 2433-3  Dated Peshawar, the 22/6/2015

- Copy of the above is forwarded for information to the :-
1. P.A to Director Information.
  2. Assistant Director (IT).
  3. Assistant Director/Superintendent (T).

*ofc*  
  
**ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR**

  
  
**FOR DIRECTOR**



**DIRECTORATE OF INFORMATION  
GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR**

No.INF/Estt./1-28/\_\_\_\_\_  
Dated Peshawar the \_\_\_\_/\_\_\_\_/2015

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**OFFICE ORDER**

Syed Anwar, Assistant of this Directorate is hereby treated as on leave without pay for one day on 02.10.2015 for his willful absence from duty.

**ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR**

Endst: No.INF/Estt:/ 4599-4602 Dated, Peshawar, the 5/10/2015.

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. P.A to Director Information, Govt: of Khyber Pakhtunkhwa.
3. Syed Anwar, Assistant.
4. Bill Clerk.
5. Office Order File.

*Amam*

**ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR**

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*WP*  
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5-6-27

Syed Anwar, Assistant is remained absent from the office (Evening Shift) from 1st October to 8<sup>th</sup> October, 2015.

Submitted for information, please.



Duty Officer 8/10/15  
Evening Shift

A. D. (PI)

A. D. (ADMN)

9-X-15

SE

9/10



DIRECTORATE OF INFORMATION  
GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR

No.INF/Estt./1-28/ 4714  
Dated Peshawar the 09/10/2015

**OFFICE ORDER**

Mr. Syed Anwar, Assistant of this Directorate is hereby treated as on leave without pay for three days w.e.f 21.9.2015 to 23.09.2015 for his willful absence from duty.

  
**ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR**

Endst: No.INF/Estt./\_\_\_\_\_

Dated, Peshawar, the \_\_\_/\_\_\_/2015.

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. P.A to Director Information, Govt: of Khyber Pakhtunkhwa.
3. Duty Officer (Evening Shift) w/r to his note.
4. Mr. Syed Anwar, Assistant.
5. Bill Clerk.
6. Office Order File.

  
**ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR**



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**DIRECTORATE OF INFORMATION**  
**GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR**

INF/Estt:/1-28/\_\_\_\_\_  
Dated Peshawar the \_\_\_\_/\_\_\_\_/2015

**OFFICE ORDER.**

Syed Anwar, Assistant is hereby treated as on leave without pay for 03 days with effect from October 5-7, 2015 for his willful absence from duty.

**Sd/----**  
**Director Information**  
**Govt. of Khyber Pakhtunkhwa**

Endst: No.INF/Estt:/ 4721-26 Dated Peshawar the 9/10/2015

Copy forwarded to the:-

- 1) Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2) Assistant Director (PI)/Duty Officer w/r to his note.
- 3) Syed Anwar, Assistant.
- 4) Bill Clerk.
- ✓ 5) Office Order File.

  
**ASSISTANT DIRECTOR (ADMN)**  
**FOR DIRECTOR**





GOVERNMENT

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DORATE OF INFORMATION  
KHYBER PAKHTUNKHWA PESHAWAR

No. INF/Estt:/PF/ 5309  
Dated Peshawar, the 20/11/2015

### CHARGE SHEET.

I, Shuaib-ud-Din, Director Information as Competent Authority, hereby charge you, Mr. Syed Anwar, Assistant, Directorate of Information, Khyber Pakhtunkhwa, Peshawar as follow:

That you while posted as Assistant has made yourself guilty of misconduct:

- I. That Mr. Farid Ullah Khan, Bureau Chief Daily Ausaf, Peshawar has reported that you on Thursday October 1, 2015 resorted to the use of abusive language on telephone against the Peshawar based reporters of a national daily newspaper after they refused to disclose the source of a news carried by the daily with regard to local government. They advised you to adopt proper procedure for obtaining such information but you continued abusing them. Your this rowdy attitude is not only against the office decorum but has also earned a bad name for the Information & PRs Department as well as the Directorate of Information.
- II. That during your entire service career spanning over one year and 11 months, you had been posted in various sections of the Directorate including the Electronic Media, IT, Transport, Advertisement and PI Section etc but every time you were transferred from one section to the other after your failure to perform up to the satisfaction of the section(s) Incharge. While working in the PI Section, you faught with the Incharge officer thus leaving a bad precedent of rudeness. Your this rude behavior and unsatisfactory performance speak volumes of your non-devotion to official duty as well as disregard for office discipline.
- III. That you were treated without pay for 11.05.2015, 02.10.2015, 21.09.2015 to 23.09.2015 and October 5 to 7, 2015 for your willful absence from duty, which reflected that you had least interest in the performance of official duty.
- IV. That an explanation vide letter No. INF/Estt:/PF/4594 dated 02.10.2015 and advice vide No. INF/Estt:/PF/2432 date 22.04.2015 had already been served to you to mend your ways and be focused on your official duties but the same had no bearing upon you.

You are, therefore, required to submit your written defense within seven days of the receipt of this charge sheet to the Enquiry Officer.

Your written defense, if any, should reach the Enquiry Officer within the specified period failing which it shall be presumed that you have no defense to put in and ex-parte action shall be taken against you.

It may be intimated as to whether you desire to be heard in person or otherwise.

A statement of allegations is enclosed.

  
DIRECTOR INFORMATION  
KHYBER PAKHTUNKHWA



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**DIRECTORATE OF INFORMATION**  
**GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR**

No. INF/Estt:/PF/\_\_\_\_\_  
Dated Peshawar, the \_\_\_\_/\_\_\_\_/2015

**DISCIPLINARY ACTION**

I, Shuaib-ud-Din, Director Information as competent authority, am of the opinion that Mr. Syed Anwar, Assistant of this Directorate has rendered himself liable to be proceeded against as he committed the following acts/omissions within the meaning of section-3 (a), (b) and (d) of the Government of Khyber Pakhtunkhwa, Efficiency & Discipline Rules, 2011.

**STATEMENT OF ALLEGATIONS**

- I. That Mr. Farid Ullah Khan, Bureau Chief Daily Ausaf, Peshawar has reported that you on Thursday October 1, 2015 resorted to the use of abusive language on telephone against the Peshawar based reporters of a national daily newspaper after they refused to disclose the source of a news carried by the daily with regard to local government. They advised you to adopt proper procedure for obtaining such information but you continued abusing them. Your this rowdy attitude is not only against the office decorum but has also earned a bad name for the Information & PRs Department as well as the Directorate of Information.
  - II. That during your entire service career spanning over one year and 11 months, you had been posted in various sections of the Directorate including the Electronic Media, IT, Transport, Advertisement and PI Section etc but every time you were transferred from one section to the other after your failure to perform up to the satisfaction of the section(s) Incharge. While working in the PI Section, you faught with the Incharge officer thus leaving a bad precedent of rudeness. Your this rude behavior and unsatisfactory performance speak volumes of your non-devotion to official duty as well as disregard for office discipline.
  - III. That you were treated without pay for 11.05.2015, 02.10.2015, 21.09.2015 to 23.09.2015 and October 5 to 7, 2015 for your willful absence from duty, which reflected that you had least interest in the performance of official duty.
  - IV. That an explanation vide letter No. INF/Estt:/PF/4594 dated 02.10.2015 and advice vide No. INF/Estt:/PF/2432 date 22.04.2015 had already been served to you to mend your ways and be focused on your official duties but the same had no bearing upon you.
2. For the purpose of scrutinizing the conduct of the said accused with reference to the above allegations, Mr. Zabita Khan, Information Officer is hereby appointed as Enquiry Officer under section-10 of the E&D Rules.
  3. The Enquiry Officer shall, in accordance with the provisions of the Rules, provide reasonable opportunity of hearing to the accused; record its findings and make, within fifteen days of the receipt of this 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 Enquiry Officer.

/

**DIRECTOR INFORMATION**  
**KHYBER PAKHTUNKHWA,**  
**PESHAWAR**

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Endst:No.INF/Estt:/PF/ 5310-12 Dated Peshawar, the 20/11/2015

A copy on the above is forwarded to:-

1. Mr. Zabita Khan, Information Officer for initiating proceedings against the accused under the provision of the Section 3(b) and (d) of the Government of Khyber Pakhtunkhwa, Efficiency & Discipline Rules, 2011.
2. Mr. Syed Anwar, Assistant with the direction to appear before the Inquiry Officer on the date, time and place fixed by the Inquiry Officer for the purpose of the inquiry proceedings.
3. Mr. Salim Khan, Assistant Director (Admn) with the request to detail a departmental representative well conversant with the facts of the case alongwith relevant record to assist the Inquiry Officer during the inquiry proceedings.

*ok*  
DIRECTOR INFORMATION  
KHYBER PAKHTUNKHWA,  
PESHAWAR

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**DIRECTORATE OF INFORMATION  
GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR**

No. INF/Estt./1-28/\_\_\_\_\_  
Dated Peshawar the \_\_\_\_/\_\_\_\_/2015

**OFFICE ORDER**

Mr. Zabita Khan, Information Officer is hereby appointed as Inquiry Officer to conduct probe into the misconduct/misbehavior of Mr. Syed Anwar, Assistant, Directorate of Information with Peshawar-based journalists as well as willfull absence from official duty.

The Inquiry officer shall submit his report within thirty days period after the receipt of this order.

Sd/-  
**DIRECTOR INFORMATION  
KHYBER PAKHTUNKHWA**

Endst: No. INF/Estt./1-28/ 5314-16 Dated Peshawar, the 20/11/2015

Copy of the above is forwarded for information to the:-

1. Mr. Zabita Khan, Information Officer/ Inquiry Officer.
2. Mr. Syed Anwar, Assistant.
3. Office Order File.

*ah*  
**ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR**

enter the office I had to stand up or get out from the office. This situation hampered my performance.

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**DIRECTORATE OF INFORMATION  
GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR**

No. INF/Estt./PF/

Dated Peshawar, the \_\_\_/\_\_\_/2015

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To

Syed Anwar, Assistant  
Account Section.

Subject:- **ENQUIRY PROCEEDING**

The undersigned has been appointed as enquiry officer vide this Directorate's Endst: No. INF/ESTT:/1/28/5314-16, dated 2011-2015 to conduct enquiry against you as you have already been charge sheeted for misconduct/misbehavior as well as willfully absence from from duty.

You are, therefore, directed to attend this office on 30-11-2015 at 11:00 AM for personal hearing and written defence, if any, in this connection.

(ZABITA KHAN)  
Enquiry Officer

Endst: No. INF/ESTT:/ 5479

dated Peshawar the 27 /11/2015.

✓ Copy forwarded to the Assistant Director (Admn), with the request to depute a well conversant official in the case with relevant record to assist the undersigned in the enquiry proceedings please.

  
Enquiry Officer

enter the office. I had to stand up or get out from the office. This situation hampered my performance.

To The Director  
Information & PR, KPK Peshawar

Subject, " Appeal / Request for restoration of  
pay "

Sir, Reference to your office order

NO. Inf/Estt: /4715-20 dated 9/10/15, I  
request to you with due apology that  
on 21-9-2015 my nephew went through  
a pependix operation and on 23 I shifted  
my family to Banna for Eid celebration.  
There was also transport problem / shortage  
due to Eid. Due to this serious problem  
I could not take written leave. Moreover  
on 5-7 October I frequently visited  
the Ausaf office on the directive / advice  
of honorable Director Shoib-U-Din Sahib for  
compromise with Editor of the newspaper.  
I was also very ill and mentally  
disturb over that complication. The director  
Sahib verbally told me to work in Establish-  
ment. Hence I was also confused about  
my duty place / section. However In the  
future I assure you that I will not  
get absent from the office without your  
permission. Kindly restore my pay.

Thanks Yours Obediently  
Syed Anwar/Asst

Recd  
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Syed

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Subject: ENQUIRY REPORT.

Reference this office letter No.INF/5310-12 dated 20<sup>th</sup> November 2015, regarding the enquiry of Charge Sheet served to Syed Anwar Assistant, Directorate of Information, Khyber Pakhtunkhwa, Peshawar.

In order to probe the issues mentioned in the Charge Sheet para No.1, the undersigned visited the office of Daily Ausaf Peshawar, Bureau Office Khyber Supper Market, Bara Road, Peshawar Cantt. The matter of misbehavior and rudeness of Syed Anwar, Assistant with the Bureau Chief of Daily Ausaf and its staff members was discussed with Bureau Chief Daily Ausaf Mr. Faridullah Khan. The complainant. Mr. Faridullah Khan told the undersigned that the said Assistant rang up one of his staff members and got wanted to know the source of one of the news published in Daily Ausaf. He pressed and insisted repeatedly to get know about the source using dictating language. As the telephonic argument between them went longer, the bureau chief asked his staff members, let him talk to the Information staff who was on telephone from the other side. According to Mr. Faridullah Khan, he tried his best to calm down the Assistant online but the argument went warm instead to calm down. He admitted that when the Assistant did not try to listen the argument and kept try giving dictation, then exchange of harsh words started from both sides.

During discussion, the undersigned tried to get Mr. Faridullah Khan know that the official in question was an Assistant and deputed in the PI Section a few days back. He did not know most of the journalists and even journalistic ethics. Mr. Faridullah after detail discussion on the subject was convinced that the official was inexperienced and also tendered his apology. Mr. Ansarullah, Station Director Pakhtunkhwa Radio FM 92.2 MHz, Peshawar also played an important role to reconcile the issue.

Moreover, Syed Anwar, Assistant also admitted his mistake verbally and in writing. He also admitted that he had not only by-passed his immediate Incharge of the Section but also misused his power while dealing with a senior journalist about the issue which was not his mandate.

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His rudeness and aggressive attitude with his seniors and staff members was also investigated and as alleged in the charge sheet vide para-II.

However, he also has given the explanation of said para in his written reply. The rudeness, aggressiveness and loose of temperament was found in his behavior. He also has admitted such bad aspect of his personality. He has counted a number of reasons behind such unwanted aspect of his life, such as domestic and family problems as well as minor mental disorder for purpose he has received treatment from renowned psychiatric physician of Peshawar.

Moreover, the other allegations such as leave without prior permission from competent authority and late coming could not be denied. However, on the other hand he has the potential as well as commitment to improve his performance and behavior.

However, Mr. Syed Anwar, Assistant has breached disciplinary rule and deserved to take minor disciplinary action under the Govt. of Khyber Pakhtunkhwa, Efficiency & Discipline Rule 2011.

  
18/12/15  
(ZABITA KHAN)  
Enquiry Officer

**DIRECTOR INFORMATION,**  
**KHYBER PAKHTUNKHWA**



Telephone: 9214131



KHYBER PAKHTUNKHWA PUBLIC SERVICE  
COMMISSION  
2-Fort Road Peshawar Cantt

18

No.KP/PSC/Admn/GF-590/ 002547

Date 6-3-2019

To

The Director General,  
Directorate of Information & Public Relations,  
Khyber Pakhtunhwa Peshawar.

Subject: ENQUIRY PROCEEDINGS REGARDING IMPERSONATION  
CASE IN THE COMPETITIVE EXAMINATION FOR THE POST  
OF TEHSILDAR / NAIB TEHSILDAR ADVERTISED VIDE  
COMMISSION ADV. NO.01/2018 & 02/2018

Dear Sir,

I am directed to refer to the subject noted above and to state that Mr. Syed Anwar S/O Mir Khanan presently serving as Assistant in Directorate of Information & Public Relations Khyber Pakhtunhwa is allegedly involved in an impersonation case detected during Competitive Examination for the post of Tehsildar / Naib Tehsildar held from 04-12-2018 to 08-12-2018. Thus an enquiry committee has been constituted to probe into the matter. I am therefore to request that the said person may be asked to attend the inquiry proceeding / personal hearing in the office of Member-VI Khyber Pakhtunkhwa Public Service Commission scheduled on 11-03-2019 at 1400 Hours.

Yours faithfully

Assistant Director  
(Admn) 05/03

DD (AO)  
Fomir P.

AO

Copy to:

PS to Member-VI & VII, Khyber Pakhtunkhwa PSC.

Assistant Director  
(Admn)



19 82

**DIRECTORATE GENERAL INFORMATION & PRs**  
**KHYBER PAKHTUNKHWA**  
**Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar**  
**No. INF/PS/ 95      Dt: 22/10/2018**

**OFFICE ORDER**

Mr. Sayed Anwar, Assistant of this Directorate presently working in the office of Press Secretary to Chief Minister, Khyber Pakhtunkhwa, has been found claiming to be the PRO to the Chief Minister Khyber Pakhtunkhwa on social media. This act on the part of Sayed Anwar apparently is an effort to enhance his reputation which can not be justified by facts.

Mr. Ansarullah Khilji, Director (Public Relations) Directorate General Information & Public Relations, Khyber Pakhtunkhwa is hereby appointed as Enquiry Officer to probe into the matter of impersonation.

The Enquiry Officer is hereby directed to find out the facts and report to the undersigned within three days for onward submission to the competent authority for further necessary action, please.

/

**DIRECTOR GENERAL**

**Endst: no. & date even:**

Copy to the:

- 1- PS to Principal Secretary to Chief Minister, Govt. of Khyber Pakhtunkhwa.
- 2- PS to Secretary Information & PRs, Govt. of Khyber Pakhtunkhwa.
- 3- Director (Public Relations) DGIPRs, Khyber Pakhtunkhwa.
- 4- Press Secretary to Chief Minister, Govt. of Khyber Pakhtunkhwa.
- ✓ 5- Deputy Director (Administration) DGIPRs, Khyber Pakhtunkhwa.

*Recd to duty*

*Deputy*

*23/10/18*

/

**DIRECTOR GENERAL**



(20) 82

**DIRECTORATE GENERAL INFORMATION & PRs**  
**KHYBER PAKHTUNKHWA**  
**Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar**  
No. INF/PS/ 96 Dt: 22/10/2018

---

To

**Mr. Sayed Anwar,**  
Assistant,  
Directorate General Information & PRs,  
Khyber Pakhtunkhwa, Peshawar.

Subject: **ENQUIRY**

The undersigned has been appointed as Enquiry Officer vide this office letter No.INF/PS/ 95, dated 22/10/2018 to probe into the matter of aggrandizement.

You, are, hereby directed to attend the office of the undersigned on Wednesday October 24, 2018 at 11.00 AM for personal hearing/written defense, if any, in this regard. please.

/

DIRECTOR (PRs)

**Endst: no. & date even:**

Copy to the:

- 1- PS to Secretary Information & PRs, Govt. of Khyber Pakhtunkhwa.
- 2- PS to Director General Information & PRs, Khyber Pakhtunkhwa.
- 3- Press Secretary to Chief Minister, CM Secretariat, Peshawar.
- ✓ 4- Deputy Director (Administration) DGIPRs, Khyber Pakhtunkhwa



22 84

DIRECTORATE GENERAL INFORMATION & PRs  
KHYBER PAKHTUNKHWA  
Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar  
No. INF/PS/ 98 Dt 29/10/2018

Subject: ENQUIRY

P-82

Subsequent upon my appointment as Enquiry Officer vide this office letter No. INF/PS/95 dated 22/10/2018, I conducted the enquiry and the report is submitted for your perusal, please.

- 1- Sayed Anwar, Assistant was called by the undersigned for personal hearing on 24/10/2018.
- 2- Sayed Anwar explained his position before the undersigned and also submitted his reply in writing.
- 3- I am of the view that the official is highly qualified person and has been working as PRO to Chief Minister right from the day first.
- 4- Sayed Anwar earlier had been working as PRO to different provincial ministers.
- 5- There are examples of other officials who are not officers but are working as PROs to various ministers.
- 6- Though the undersigned did not find any reason to hold Sayed Anwar as guilty, however, he has apologized and pledged in his written reply that he will not repeat if it's a mistake.

Recommendations:

- 1- It is recommended that any charge leveled against him may be withdrawn.
- 2- The individual is performing his duties well so he may not be disturbed by transferring him.

/

DIRECTOR (Public Relations)

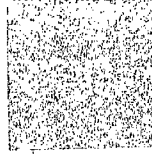
Endst: no. & date even:

Copy to the:

- 1- PS to Secretary Information & PRs, Govt. of Khyber Pakhtunkhwa.
- 2- PS to Director General Information & PRs Khyber Pakhtunkhwa.
- 3- PS to Minister, Khyber Pakhtunkhwa.
- 4- PS to all concerned.
- 5- Office Order File.

*ANWAR*  
29/10/18  
DIRECTOR (Public Relations)

Telephone: 9214131



PAKHTUNKHWA PUBLIC SERVICE  
COMMISSION

2-Fort Road Peshawar Cantt

99

98

No.KP/PSC/Admn/GF-590/

00037

Date 6-3-2019

To

The Director General,  
Directorate of Information & Public Relations,  
Khyber Pakhtunhwa Peshawar.

Subject: ENQUIRY PROCEEDINGS REGARDING IMPERSONATION  
CASE IN THE COMPETITIVE EXAMINATION FOR THE POST  
OF TEHSILDAR / NAIB TEHSILDAR ADVERTISED VIDE  
COMMISSION ADV. NO.01/2018 & 02/2018

Dear Sir,

I am directed to refer to the subject noted above and to state that Mr. Syed Anwar S/O Mir Khanan presently serving as Assistant in Directorate of Information & Public Relations Khyber Pakhtunkhwa is allegedly involved in an impersonation case detected during Competitive Examination for the post of Tehsildar / Naib Tehsildar held from 04-12-2018 to 08-12-2018. Thus an enquiry committee has been constituted to probe into the matter. I am therefore to request that the said person may be asked to attend the inquiry proceeding / personal hearing in the office of Member-VI Khyber Pakhtunkhwa Public Service Commission scheduled on 11-03-2019 at 1400 Hours.

Yours faithfully

Assistant Director  
(Admn)

05/03

~~DD (A)~~  
Fomula Pl.

AO

Copy to:

PS to Member-VI & VII, Khyber Pakhtunkhwa PSC.

7/3  
7/3/19

Assistant Director  
(Admn)

## INQUIRY REPORT



(2)

(67)

Subject: IMPERSONATION IN THE COMPETITIVE EXAMINATION HELD FOR THE POST OF TEHSILDAR/NAIB TEHSILDAR FROM 04 TO 08 DECEMBER 2018

The Competent Authority was pleased to constitute an Inquiry Committee comprising the following Members of Khyber Pakhtunkhwa Public Service Commission vide No.KP/PSC/Admn/FF-602/000184 dated 02-01-2019:-

- |     |                      |            |          |
|-----|----------------------|------------|----------|
| i)  | Mr. Qudratullah Khan | Member-VI  | Chairman |
| ii) | Mr. Manzoor ul Haq   | Member-VII | Member   |

2. TORs of the Inquiry Committee shall be as under:-

- i) To probe into impersonation committed by Mr. Hazrat Noor S/O Jannat Noor Roll No.1700 (candidate) and Mr Arif Wazir S/O Ahmad Khan Wazir (impersonator) during Competitive Examination held from 04-12-2018 to 08-12-2018 for the post of Tehsildar/Naib Tehsildar in Board of Revenue advertised vide Khyber Pakhtunkhwa Public Service Commission Advertisement No.01/2018 & 02/2018.

### 3. BRIEF HISTORY

The PSC conducted competitive examination for the post of Tehsildar/Naib Tehsildar from 4 to 8 December 2018. During the English paper in the examination centre at Government Higher Secondary School No.3 Peshawar Cantt, on the first day, the Supervisory Staff noticed that the photograph furnished to the PSC by a candidate, Hazrat Noor S/O Jannat Noor, Roll No.1700, and affixed on the attendance sheet was not that of the candidate concerned (**Annexure-I**). This person taking the paper as Hazrat Noor, when questioned, identified himself as Arif Wazir. He gave a written statement admitting his appearing in the exam in place of Hazrat Noor. He was handed over to the Police where he identified himself as Syed Anwar. An FIR No. 412 dated 04-12-2018 u/s 419-420-468-471-109 was registered against him and his accomplice Mr Hazrat Noor at Police Station Gulberg Peshawar (**Annexure-II**). The case has been challaned to the Court.

### 4. PROCEEDINGS

The Inquiry Committee held its proceedings on 23 January, 04 and 12 February, 11 and 19 March and 18 April, 2019. The officials on duty in the examination centre and the accused persons were called to appear before

*[Handwritten signature]*

(24) 2  
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the Inquiry Committee. All except the candidate, Hazrat Noor, complied the instructions. Hazrat Noor was sent letters on his known address (**Annexure-III**) and was also called on telephone by Mr Kashif Adnan, Assistant of PSC (**Annexure-IV**). He managed to return the registered post undelivered and disowned the Cell No.0333-9333292 he had given in his application forms. He had applied to the PSC a number of times (**Annexure-V**). Later he managed to send a letter to the PSC/Committee through a lawyer conveying that the case was sub-judice and the Inquiry Committee should not proceed in it (**Annexure-VI**). The Committee consulted the Legal Advisor PSC who opined as under:

“ In light of Establishment Department letter No.SOR(S&GAD) 5-(29)/86(kc) dated 08.01.1990, Departmental Inquiry and Judicial Proceeding can run parallel to each other against the accused/official”.

Hence the Inquiry Committee proceeded with the inquiry accordingly.

5. Mr Rizwanullah, Deputy Director PSC

Appearing before the committee on 23-01-2019, Mr Rizwanullah, Deputy Director, said that he was deputed as inspection supervisor to three examination centres including GHSS No.3 Peshawar Cantt. While he was in the examination hall in GHS Salwan, Mr Rafiullah, Naib Qasid, informed him on phone about the incident. He rushed to the examination hall where Syed Anwar had been appearing in place of Hazrat Noor. When asked the accused did not produce his original CNIC. He instead produced the photocopy of an Identity Card bearing his photo and the particulars of Hazrat Noor. The accused recorded his statement and was handed over to the police. Statement of Inspection Supervisor is at **Annexure-VII**.

6. Mr Abdul Saeed, Principal GHSS No.3 Peshawar Cantt.

Mr Abdul Saeed, Supervisor, appeared before the Inquiry Committee on 04-02-2019. He stated that while inspecting the exam hall he checked the Identity Card of the person sitting for Roll No.1700. It looked different from the usual Identity Card (copy at **Annexure-VIII**). On checking he found the photograph of the Identity Card different from the photograph provided to the PSC with the application form. He took a photo of the accused so as to preserve the proof and handed him over to the Police. His statement is at **Annexure-IX**.

In his written statement Syed Anwar, the accused has recorded his name as Arif Wazir S/O Ahmad Khan Wazir. His statement reads as “ **I hereby confessed that I was deceived by my friend Hazrat Noor who requested me**


to kindly appear for one of the paper of English of Tehsildar exam. He further told me that he has taken Mr Mumtaz of KPPSC into confidence. Hence I came into the examination hall. I am apologized for mistake and I will never repeat this mistake". The statement is at Annexure-X.

7. Mr Kausar Ali, Superintendent PSC

Mr Kausar Ali appeared before the Inquiry Committee on 12-02-2019. He stated that he was on duty as Deputy Supervisor at the examination centre at GHS No.3 Peshawar on 04 April 2019. When taking attendance he asked the person appearing as candidate in place of Hazrat Noor to show his Identity Card, who produced a duplicate NIC wherein the photo did not tally with that of the attendance sheet. This led him to suspect the person. He handed him over to the Principal of the School who was the Supervisor of the examination hall for further action. Statement of Deputy Supervisor at Annexure-XI.

8. Syed Anwar (Accused Impersonator)

Syed Anwar who is an employee of the Information Department Khyber Pakhtunkhwa, at first did not appear before the Committee. When a letter No. KP/PSC/Admn/GF-590/004967 dated 06-03-2019 was issued to the Director General Information Department (Annexure-XII) requesting him to direct Syed Anwar to attend the inquiry proceedings, then he appeared before the Inquiry Committee on 11-03-2019. He stated that he accompanied Hazrat Noor on his request to the examination hall to boost his morale. On the way to the hall Arif Wazir also got into their car. Hazrat Noor had however informed him two days earlier that he had spoken to Mumtaz Khan, an official of the PSC, who would help him in impersonation against a payment of Rs.1,50,000/- per paper. Thus he asked Syed Anwar to appear in the examination in his place who declined. Then Hazrat Noor asked Arif Wazir who agreed to do so. The three reached the examination hall. Arif Wazir went inside the hall and the other two stayed outside. Arif Wazir came out after a short while and then Syed Anwar requested the staff on duty to give Hazrat Noor a chance. Arif Wazir disappeared from the scene in the mean time. The staff impounded Syed Anwar and asked him to produce Arif Wazir and Hazrat Noor otherwise they would not let him go. He called Hazrat Noor on phone but he chose not to come back. The staff handed him (Syed Anwar) over to the Police. The picture taken by the Superintendent in the examination hall confirmed Syed Anwar was taking paper in the hall (Annexure-XIII). Moreover, the Deputy Supervisor identified him before the Inquiry Committee. Syed Anwar further stated that Mumtaz Khan came to him with the request not to mention his name to the Inquiry Committee. After two three days they met at Pishtakhara chowk and Mumtaz repeated the request. Mumtaz Khan came to him again and spoke to him on telephone the day he was appearing before the





(96) (S) 17c

Inquiry Committee. He asked him not to appear before the committee. Syed Anwar did not oblige Mumtaz Khan. He provided telephone No. 0331-4488388 on which Mumtaz had called him that day that is on 11<sup>th</sup> March, 2019. His statement is at **Annexure-XIV**.

9. Mumtaz Khan (Assistant PSC)

Mumtaz Khan appeared before the Inquiry committee on 23-01-2019. He said that he was on duty at GHS NO.2 Peshawar City. He learned that some individual appearing in the exam in another hall had accused him of having struck a deal with him to help him in impersonation. He denied the allegation of striking a deal with Hazrat Noor. He also denied having any contact with both the accused persons. His statement is at **Annexure-XV**. Mumtaz Khan appeared again when Syed Anwar appeared before the Committee on 11<sup>th</sup> March 2019. This time he said that he had gone to the Police station after learning from a colleague in the office that an arrested person had blamed him for allowing him to appear in place of a candidate namely Hazrat Noor for a payment of Rs.1,50,000/-. According to Mumtaz Khan the accused mentioned his name so as to save their skin. He met both Mr Hazrat Noor and Syed Anwar and asked them as to why they had misused his name. He asked them to appear before the Inquiry Committee and tell the truth. He did not mention these facts in his first statement. He said he wanted to disclose this information on an appropriate time. He apologized for holding back the information. His statement is at **Annexure-XVI**.

10. Atlas Khan(Superintendent PSC)

Atlas Khan appeared before the Inquiry Committee on 24-04-2019. Syed Anwar had accused Mumtaz Khan of calling him on phone in an effort to refrain him from appearing before the Inquiry Committee. He furnished the phone No.0331-4488388 from where he received a call the same day. The number was located. It belongs to Mr Atlas Khan, Superintendent PSC. When inquired Mr Atlas Khan stated that the SIM was in use of his son, Muhammad Arif. His statement is at **Annexure-XVII**.

11. Muhammad Arif

Muhammad Arif, the son of Atlas Khan, appeared before the Committee on 26-04-2019. He denied having ever lent his phone to Mumtaz Khan. He claimed that he was away for Tableegh in Lahore on the said date. His statement is at **Annexure-XVIII**.

4

12. FINDINGS

Examining the statements of all those appeared before the Inquiry Committee, hearing and cross examinations, the Inquiry Committee reached the conclusion that the act of impersonation has taken place. The statements recorded by the staff supervising the examination hall are without any ambiguity. The Inquiry Committee's findings are given as under:

- a) Hazrat Noor did not appear before the Committee. Had the impersonation not aborted, he would have been the beneficiary in the case. He managed to return the letters sent to him undelivered, attended once a phone call made by Kashif Adnan, Assistant of PSC and despite promising to attend the inquiry proceedings, chose not to appear before the Committee. He did not attend the phone calls made by the Assistant afterwards. He also arranged a letter from a lawyer asking the Committee not to proceed in the matter as the case was sub-judice.
- b) Hazrat Noor applied for the post of Tehsildar/Naib Tehsildar and did not appear in the examination. If there was a genuine reason for his absence, he would not have refrained from appearing before the Inquiry Committee and telling the truth.
- c) Syed Anwar, an employee of Information Department, Government of Khyber Pakhtunkhwa, was present in the examination hall, as supported by the statements of Supervisory staff, including Hall Incharge Principal of GHSS No.3 Peshawar Cantt. He had posed himself as Arif Wazir. An FIR No.412 u/s 419-420-468-471-109 dated 04-12-2018 was registered in Police Station at Gulberg Peshawar against the accused persons.
- d) As far as the role of Mumtaz Khan is concerned, he has made two statements. He initially denied having any contacts with Hazrat Noor and Syed Anwar. But in his second statement he admitted having met them and once visited the Police Station to meet Syed Anwar who was then in Police custody. Syed Anwar has accused him of collusion with Hazrat Noor and has levelled allegations against Mumtaz Khan for accepting of Rs.1,50,000/- per paper as gratification from Hazrat Noor and trying to stop the two accused from appearing before the Committee. The accused, Hazrat Noor, who is said to have struck a deal with Mumtaz Khan did not appear before the Committee. Syed Anwar said he had received a call from Mumtaz Khan mobile No. 0331-4488388 at 10.36am on 4<sup>th</sup> April. The snapshot is at **Annexure-IXX**.

(28) (2)

Mumtaz Khan denied having called him at that time. The Committee traced the owner of the mobile sim, namely Atlas Khan Superintendent, PSC. He appeared before the Committee on 24-04-2019 and admitted the ownership of the mobile sim. But he said that the sim was under the use of his son Muhammad Arif. His son Muhammad Arif appeared on 26-04-2019 before the Inquiry Committee and stated that he was away for Tableegh from 05-02-2019 to 17-03-2019 and no one else has used his mobile phone during this period.

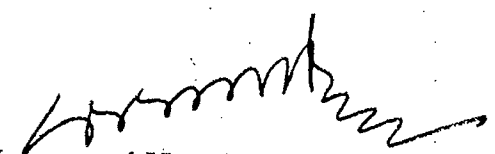
e) Keeping in view the above proceedings, no evidence was produced against Mumtaz Khan except the statement of Syed Anwar which has created doubt about his role.


### 13. RECOMMENDATIONS

i) Keeping in view the facts and statements of all concerned, the Inquiry Committee is of the view that both the persons, namely Hazrat Noor and Syed Anwar are held guilty of illegal act of impersonation. In this regard an FIR has been registered against them at Police Station, Gulberg Peshawar and criminal proceedings are under way. The Competent Authority may impose suitable penalty/punishments as provided in PSC Regulation 18 against Hazrat Noor and Syed Anwar.

ii) Since Syed Anwar is an employee of the Information Department Government of Khyber Pakhtunkhwa, the Commission may inform his parent department for action as deemed appropriate.

iii) The Competent Authority may order departmental inquiry against Mumtaz Khan, Assistant PSC to ascertain his involvement in the case.

  
(Manzoor ul Haq, Member PSC)  
Member  
Inquiry Committee  
15/5/19

  
(Qudratullah Khan, Member PSC)  
Chairman  
Inquiry Committee  
15/5/2019



DIRECTORATE OF INFORMATION  
GOVERNMENT OF KHYBER PAKHTUNKHWA PESHAWAR

No. INF/Estt:/PF/ 5298  
Dated Peshawar, the 23/12/2015

29

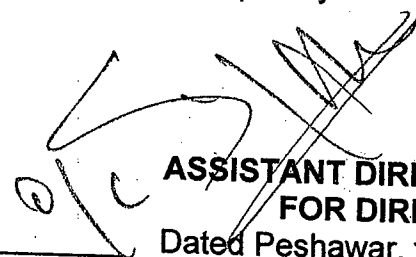
To

Mr. Syed Anwar, Assistant  
Accounts Section,  
Information Department, Peshawar.

Subject:- **CENSURE**

In light of the enquiry report and your appeal/reply against your Charge Sheet vide No. INF/Estt:/PF/5309 dated 20.11.2015, you are hereby censured not to repeat such practice in future otherwise major disciplinary action will be taken against you under E&D rules.

Endst: No. INF/Estt:/PF/ 5299

  
ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR  
Dated Peshawar, the 23/12/2015

Copy forwarded to P.A to Director Information.

  
ASSISTANT DIRECTOR (ADMN)  
FOR DIRECTOR

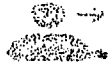
Recd  
Yasir  
28-12

10/11/16  
Syed Anwar  
28/12/2016

30/10/14

# Syed Anwar Khan Dawar

Pakhtun ta jwandoon gwaro



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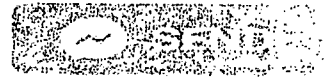
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Area Study Centre at Universit...

Studied English at Numl

Lives in Hayatabad

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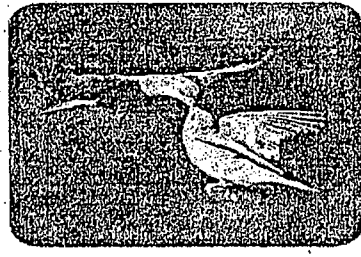
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### Posts





## Shafiq Zaman Waziri

59 mins · 🌐

26 مئی 2019ء کو وزیر کی گرفتاری کے بعد سے اب تک بین الاقوامی سطح پر مختلف تنظیموں کی جانب سے ان کی فوری رہائی کا مطالبہ زور پکڑ رہا ہے اس سلسلے میں سب سے بڑا مظاہرہ چودہ جون کو ارجنٹائن میں سوشلسٹ ورکرز موومنٹ (MST) اور انٹرنیشنل سوشلسٹ لیگ (ISL-LIS) کی جانب سے پاکستانی سفارت خانے کے سامنے منعقد ہوا، مظاہرین نے سفارت خانے میں ایک یادداشت جمع کرائی جس پر سیاستدانوں، ٹریڈ یونین، طلباء، انسانی اور ثقافتی حقوق کی اہم شخصیات کے دستخط تھے اس پیشینہ میں علی وزیر کی فوری رہائی کا مطالبہ کیا ہے اور سفارتخانہ کو اپنے تحفظات سے آگاہ کیا گیا ہے۔ یہ کسی بھی پاکستانی کی گرفتاری سے متعلق اپنی نوعیت کا شاید پہلا کیس ہے جس سے متعلق عالمی سطح پر مختلف تنظیموں کی جانب سے تحفظات کا اظہار کیا جا رہا ہے۔



Write a comment...



35

**Syed Anwar Khan Dawar**

Jun 16 at 10:37 PM · 🌐

آج پی ٹی ایم پشاور کا مشاورتی اجلاس ہوا جس میں سانحہ خڑقمر کے بعد درپیش صورتحال پر تفصیلی بحث ہوئی۔ دوستوں نے اتفاق رائے سے فیصلہ کیا کہ ظالموں کے سامنے اپنی مذاحمت جاری رکھیں گے اور مشر منظور پاشتین کی سربراہی میں ہر قسم کی قربانی کے لئے تیار رہیں گے۔ کچھ دنوں بعد پشاور کا مجلس عام بلایا جائے گا جس میں بڑے پیمانے پر احتجاج کے بارے میں حتمی فیصلہ ہو گا۔



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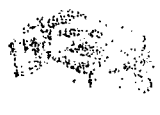


108

34

Irfanullah Burki and 55 others 4 Shares

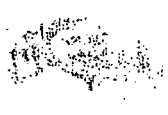
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 Syed Anwar Khan Dawar  
Jun 17 at 10:40 AM

یہ کسی قسم کا جج ہے؟ کہ  
آج علی وزیر کے پیشی کے  
اہم موقع پر چھٹی پر گیا۔  
کیا اسی عدالتی نظام سے  
اب لوگ خوش ہیں؟

59 14 Comments • 24 Shares

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 Syed Anwar Khan Dawar  
Jun 17 at 9:53 AM

نر وزیر زخمی علی وزیر کو ابھی بنوں کے کچہری



About

38% 12:06

Work

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National Forum

Peshawar, Pakistan

We aim to replace the old black system  
into a modern system ownedn run  
by the local people n make it a model  
province for the world

Assistant Officer at  
Directorate of Information Gov  
of KPK

Peshawar, Pakistan

PRO

Asst Officer at Directorate  
Sports Govt of KPK

Peshawar, Pakistan

ADP section Provincial office saddar  
Cantt peshawar

Director at Leaders Academy  
Arabab Road Peshawar

Peshawar, Pakistan

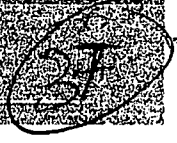
CSS/PMS/English Laguage

Former Assistant  
Development at Directorate  
General Sports Govt KPK



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2 Comments

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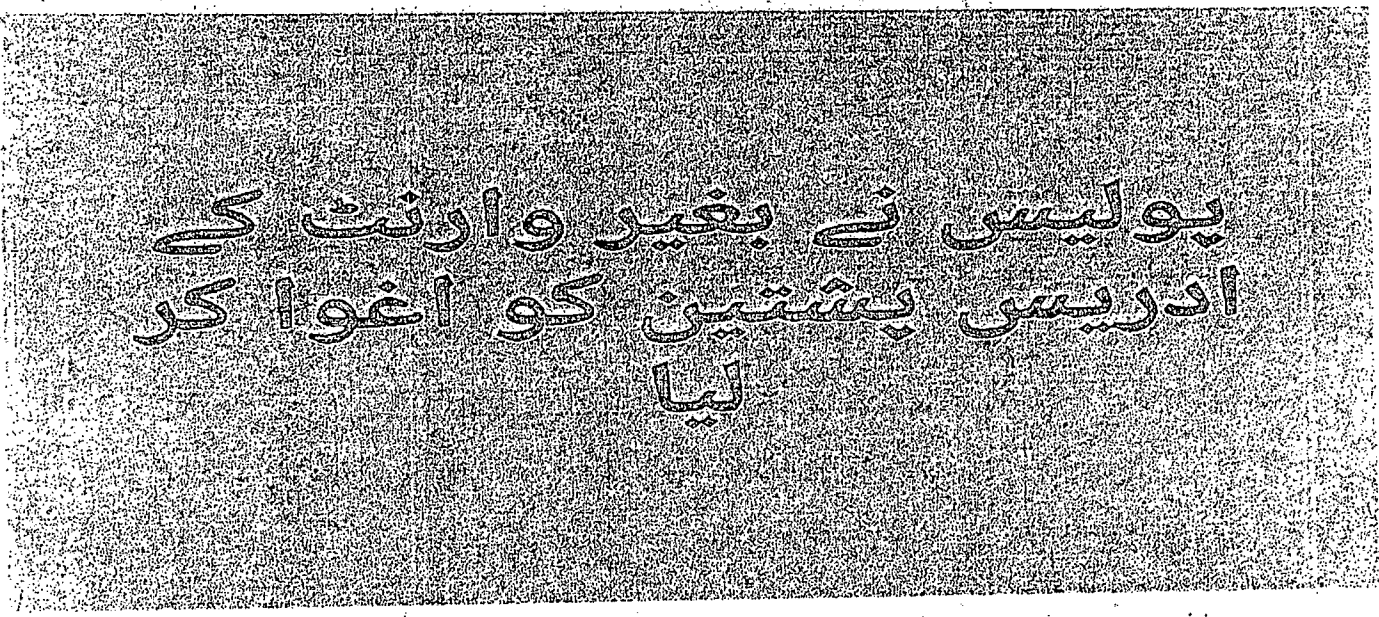
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Share



Syed Anwar Khan Dawar

Jun 5 at 11:58 PM



یولیس نے بغیر وارنٹ کے  
ادریس پشتمین کو اغوا کر  
لیا

48

2 Comments • 4 Shares

Like

Comment

Share



Syed Anwar Khan Dawar

Jun 5 at 8:50 PM



ر. ڈ. اہ. شمال. ہذا ستار. ن. آج ص. ع. ص. ایک







اے FA پاس فوجیوں !  
 تم کم پڑھے لکھے ہو۔ تم  
 ملک نہیں چلا سکتے۔  
 تمہاری وجہ سے ملک بہت  
 ہی ٹوٹ چکا ہے اور باقی  
 ماندہ ملک بھی بھیک  
 مانگے والا بن چکا ہے۔  
 ملک ہم باشعور اور اعلیٰ  
 تعلیم یافتہ لوگوں کے  
 حوالے کرو۔

Missor Dwr Pashteen and 33 others

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 Comment     
 Share

Search

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Like

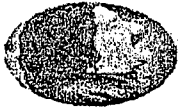
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Share



Syed Anwar Khan Dawar

Jun 8 at 10:47 PM



Ahmad Abbas  
Al-Maasi

Follow

Jun 8 at 2:51 PM

حملے کی ذمہ داری TTP نے قبول  
کر لی ہے۔

لیکن اعلان تو یہ ہوا تھا کہ  
وزیرستان کلیئر ہے ؟

پھر طالبان کہاں سے آتے ہیں ؟

14

3 Shares

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Syed Anwar Khan Dawar

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**Syed Anwar Khan Dawar**

May 22 at 11:59 AM •

فرشتہ مہمند کے احتجاج کے چند مطالبات تھے، جو وزیراعظم کے مشیر اور منسٹر CAAD نے سارے مان لئے ہیں۔

1: پولیس کی جانب سے غفلت بھرتے پر ایس ایچ او سمیت تین متعلقہ افسرز کو معطل کیا گیا اور انکے خلاف ایف ائی آر بھی درج کی جائے گی۔  
2: کیس کی انکوائری کیلئے ڈی ائی جی کی سربراہی میں جے ائی ٹی تشکیل دے دی گئی لیکن اس میں ہمارے طرف سے ہمارے 3 وکلاء بھی شامل ہونگے۔

3: ڈاکٹرز کی طرف سے پوسٹ مارٹم تاخیر کرنے پر انکے خلاف انکوائری کیلئے کمیٹی بنائی جائیگی۔

4: فرشتہ مہمند کے والدین کو زینب کیس کی طرح 50 لاکھ کے معاوضے کا اعلان کیا گیا۔

5: انصاف کیلئے جوڈیشل کمیشن بنانے کی سفارشات کی جائیگی اور اصلی مجرمان کو 1 ماہ تک سزائے واقعی دی جائیگی۔

#JusticeForFarishta

51

4 Comments • 8 Shares

Like

Comment

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Search



Syed Anwar Khan Dawar is  
with Ismail Mehsud.

Jun 2 at 2:57 PM · 🌐

محسن داوڑ جیسے اعلیٰ تعلیم یافتہ اور خوبصورت  
انسان؛ ایڈوکیٹ ہائی کورٹ اینڈ سپریم کورٹ  
؛ ماسٹر آف بزنس ایڈمنسٹریشن؛ لیڈر آف  
سٹوڈنٹس ایٹ کالج اینڈ یونیورسٹی  
؛ ممبر آف نیشنل اسمبلی پر ایک کالے میٹرک پاس  
جاہل فوجیوں نے گولیاں چلائی -  
افسوس صدا افسوس







**DIRECTORATE GENERAL INFORMATION  
KHYBER PAKHTUNKHWA, PESHAWAR**

No. IN 8/25  
Dated Peshawar, the 18<sup>th</sup> June, 2019

116  
42

**OFFICE ORDER**

Syed Anwar, Assistant, Directorate General Information & Public Relations Khyber Pakhtunkhwa is hereby suspended with immediate effect under Rule 6 of the Government of Khyber Pakhtunkhwa Efficiency and Discipline Rules, 2011 for being guilty of misconduct.

--sd--

**DIRECTOR GENERAL  
INFORMATION & PUBLIC RELATIONS KHYBER  
PAKHTUNKHWA**

**Endst No. & Date Even**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa
2. PS to Secretary Information & PRs, Government of Khyber Pakhtunkhwa
3. Syed Anwar, Assistant, DGIPR, Khyber Pakhtunkhwa
- ✓ 4. Personal File of the official
5. Office Order File

  
**DEPUTY DIRECTOR (ADMN)  
For DIRECTOR GENERAL**



**DIRECTORATE GENERAL INFORMATION & PRs  
KHYBER PAKHTUNKHWA, PESHAWAR**

No. INF/Estt./PF/...  
Dated: Pesh: 21/06/2019

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**SHOW CAUSE NOTICE**

I, Imdad Ullah, Director General Information & PRs, Khyber Pakhtunkhwa as competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and exercise of power conferred under Rule 7 of the ibid Rule do hereby dispense with the inquiry proceedings and serve you Syed Anwar, Assistant, Directorate General Information & PRs, Khyber Pakhtunkhwa, Peshawar as follow:

*That you despite being a Government servant have been found guilty of participating in political activities and delivered provoking public statements and posts against the State institutions via Social Media platforms, which is against Rule 25 (1) of the Government of Khyber Pakhtunkhwa Conduct Rules, 1987, thereby rendering yourself guilty of misconduct.*

*I am satisfied that you have committed the following acts/omission-specified in rule 3 the said rules:*

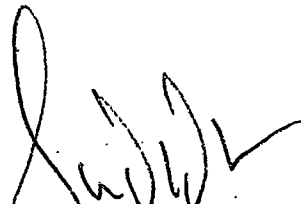
(a) *Guilty of misconduct*

2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of 'dismissal from service' under Rule 4 (1) (b) (iv) of the said rules.

3. You are, therefore, required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

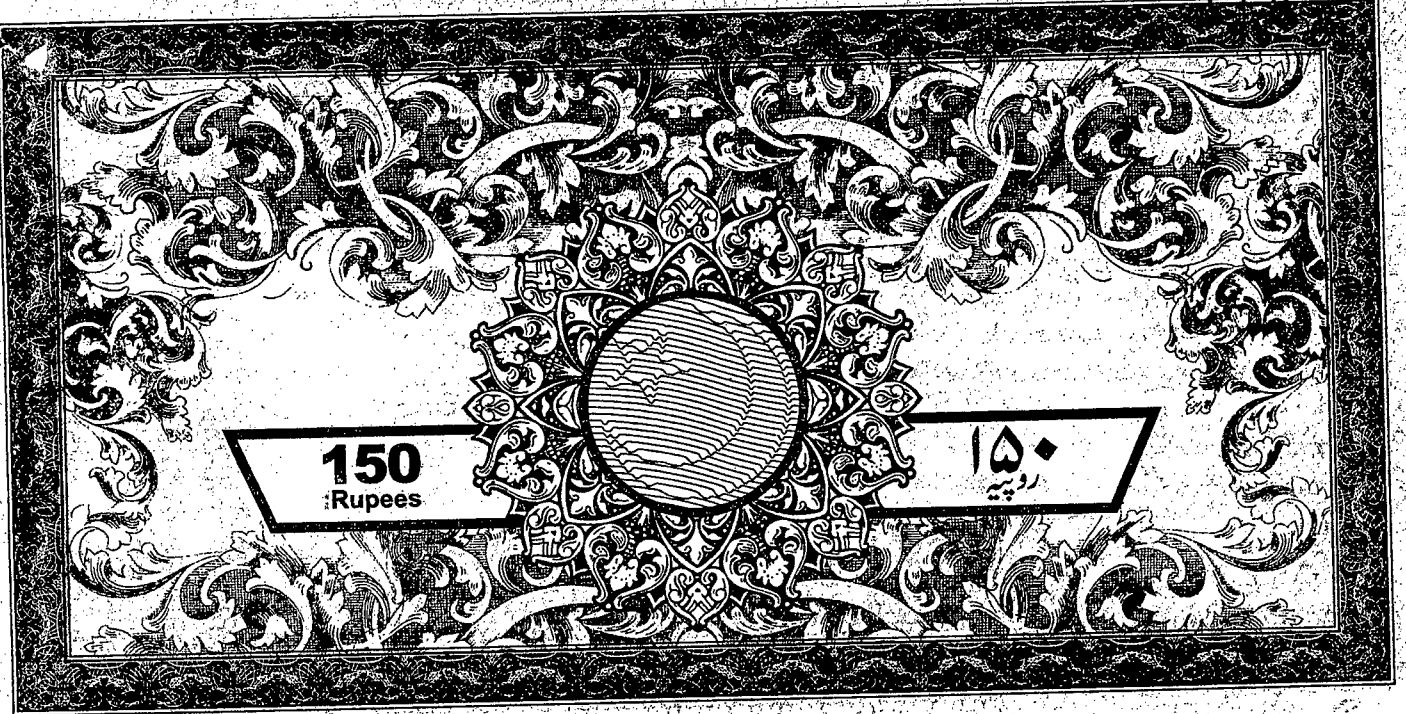
4. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex parte action shall be taken against you.

5. Copies of the statements/ posts are enclosed.

  
**DIRECTOR GENERAL  
INFORMATION & PRs,  
KHYBER PAKHTUNKHWA**

Syed Anwar,  
Assistant

*Received  
by  
Zuhair  
Anwar  
Son of  
Date 24/6/2019  
of Mr Syed Anwar Dawood*



بیانِ اظہار  
ہیں

جن کا سپر ایڈووکیٹ فیڈرل کونسل آف ایڈوکیٹس اور  
پبک ریلیشن میں ملک بیان رائے کی دینا جو کہ میں محکمہ قواد  
اس میں جمہور پر پابندی کا دورہ اور انہوں نے انہیں تمام قوانین کا نفاذ  
اور ان کے لئے گا۔ جس سے انہیں ہرگز نہیں یا انہیں محکمہ قواد میں  
نہیں ہوں گا۔ حکومتوں کے بیان میں علم و فن کے لوگوں کو درست دینا ہے۔  
کوئی امر کو پیش کرنے کے لئے

7-19  
ATTESTED  
NOTARY PUBLIC  
KHALID MAHMOOD  
PESHAWAR HIGH COURT

سید انور  
فیڈرل کونسل آف ایڈوکیٹس  
پبک ریلیشن

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
INFORMATION & PUBLIC RELATIONS  
DEPARTMENT  
091-9223527

No. SO.INF(Estt.)4-115/Enquiry/ Absent/2018  
Dated Peshawar the 22<sup>nd</sup> July, 2019

To

The Director General,  
Directorate General Information & Public Relations,  
Khyber Pakhtunkhwa, Peshawar.

Subject: INITIATION OF DEPARTMENTAL PROCEEDINGS AGAINST SYED ANWAR ASSISTANT

I am directed to refer to the subject noted above and to enclose herewith a copy of letter No. KP/PSC/Admn./GIF-590/014842 dated 17<sup>th</sup> July, 2019 received from Assistant Director (Admn.), Khyber Pakhtunkhwa Public Service Commission with the request to get all record from Police Station and put up charge sheet & statement of allegation against Syed Anwar, Assistant, Directorate General Information & PRs, Khyber Pakhtunkhwa.

*[Signature]*  
Section Officer (Establishment)

Encls: as above  
Encls: No & date:

Copy of the above is forwarded for information to the PS to Secretary Information & PRs Department, Khyber Pakhtunkhwa.

Section Officer (Establishment)

DD/CA  
For m/s Pl.  
*[Signature]*  
23/7/19

AO

*[Signature]*

2595  
23/7/19  
DIRECTOR GENERAL  
INFORMATION & PUBLIC RELATIONS  
PESHAWAR

*[Signature]*  
170719

Assistant Director (Admn)  
*[Signature]*  
5/1



KHYBER PAKHTUNKWA  
PUBLIC SERVICE COMMISSION

2-Fort Road Peshawar Cantt.  
Tele: No: 091-9214131

No.KP/PSC/Admn/GF-590/

Date: 17-7-19

(46) 162

To

The Secretary to Government of Khyber Pakhtunkhwa,  
Information and Public Relations Department, Peshawar.

Subject: INITIATION OF DEPARTMENTAL PROCEEDINGS AGAINST  
SYED ANWAR ASSISTANT

Sr/Sir,

I am directed to refer to the subject noted above and to state that the Khyber Pakhtunkhwa Public Service Commission advertised forty four posts of Tehsildar / Naib Tehsildar in Revenue & Estate Department and Zakat, Usher, Social Welfare, Special Education & Women Empowerment Department vide Adv. No.01/2018 and 02/2018 respectively. A candidate namely Hazrat Noor S/O Jannat Noor committed impersonation in the aforesaid examination. An employee of Information and Public Relations Department namely, Syed Anwar S/O Mir Khanan, was caught red handed trying to attempt the paper of "General English" on 04.12.2018 in place of Hazrat Noor (Original Candidate). The FIR was registered against them in Police Station, Gulberg Peshawar. The Khyber Pakhtunkhwa Public Service Commission also conducted inquiry to probe the matter of impersonation according to which impersonation of Hazrat Noor was proved. The aforesaid individual namely Syed Anwar S/O Mir Khanan is an employee of Information and Public Relations Department and serving as Assistant.

2. It is therefore, requested to initiate disciplinary proceedings against Syed Anwar Assistant Information and Public Relations Department under Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules, 2011 under intimation to this office.

Yours faithfully,

Assistant Director (Admn)

Copy for information is forwarded to:

1. PSO to Chief Secretary, Khyber Pakhtunkhwa.
2. PS to Chairman, Khyber Pakhtunkhwa PSC.
3. PS to Member-VI & VII, Khyber Pakhtunkhwa PSC.
4. Enquiry file.

Assistant Director (Admn)



48  
163

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
INFORMATION & PUBLIC RELATIONS  
DEPARTMENT  
091-9223527

No. SO.INF(Estt.)4-115/Enquiry/ Absent/2018  
Dated Peshawar the 22<sup>nd</sup> July, 2019

To

The Director General,  
Directorate General Information & Public Relations,  
Khyber Pakhtunkhwa, Peshawar.

Subject: REPLY TO THE SHOW CAUSE NOTICE BEARING NO. INF/ESTT:/PF/4675 DATED 21-06-2019 P-119

I am directed to refer to paras 91-104/N of the personal file of Syed Anwar, Assistant, Directorate General, Information & PRs and to state that he may be proceeded against under Rule 4 (b) (iv) of the Khyber Pakhtunkhwa Govt. Servants Efficiency and Disciplinary Rules, 2011, as he is involved in anti-state activities.

2. Personal file of Syed Anwar, Assistant is returned herewith in original.

Section Officer (Establishment)

Ends: No & date:

Copy of the above is forwarded for information to the PS to Secretary Information & PRs Department, Khyber Pakhtunkhwa.

Section Officer (Establishment)

DD/A,  
  
24/7/19

AO/AE H  
24/7/19

2610  
24/7/19  
DIRECTORATE GENERAL  
INFORMATION & PUBLIC RELATIONS  
PESHAWAR

میرے محترم ڈائریٹر سسر امداد اللہ صاحب

السلام علیکم ا اللہ سے دعاگوں ہوں کہ آپ کی سہی کو سفا  
دیتے آکل میں آیا تھا لیکن اس وقت آپ ہاسٹل میں تھے

آج میں ہسپتال میں ہوں۔ میری سہی کھانسی بلکہ کسیرا کو م سے  
ارٹھ ہسپتال میں زیر علاج ہے۔ لہذا اس خط کو میں اپنے سے  
گنڈے لیے تصحیح رہا ہوں۔

اپنی خدمت میں گزارش ہے کہ ملک سروس کمیشن کے ایک

اعتقان کے دوران میں صرف اپنے دوست کے ہمراہ سکول کے اعلیٰ میں  
موجود تھا۔ ایک ملوٹی سمجھی سازش کے تحت میرے اوپر الزام لگایا گیا کہ  
paper کو ایک دو کپے لڑنے عارف وزیر attempt کرنے کی کوشش کی تھی۔ میرا حال  
میرا کیس subjudice ہے۔ میں عدالت الصاف میں اپنے آپ کو  
کناہ پہنچانے ثابت کر رہا ہوں۔ قانون کے تحت ایک ملزم کو دو  
جگہ سے سزا نہیں دی جاسکتی جب تک عدالت سے فرم ثابت نہ ہو جائے  
۱۔ سے درخواست ہے کہ میرے سٹوکار نوٹس ہو۔ اور حلف نامہ  
کی روشنی میں مجھے بحال کرنے خدمت کرنے کا موقع دیدہ جسے

شکر  
ایک قابلہ انجمن  
سید النور و گھر جمال  
5/5/19

فون نمبر 0336591823  
AO  
05/08



(59) 173

**DIRECTORATE GENERAL INFORMATION & PRs  
KHYBER PAKHTUNKHWA, PESHAWAR**

**SHOW CAUSE NOTICE**

I, **Imdad Ullah**, Director General Information & PRs, Khyber Pakhtunkhwa as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby serve you, **Syed Anwar**, Assistant, Directorate General Information & PRs, Khyber Pakhtunkhwa as follows:

I am satisfied that you have committed the following acts/omission specified in Rule-3 of the specified rules:-

*"That as per inquiry conducted by the Khyber Pakhtunkhwa Public Commission, you have rendered yourself guilty of misconduct by committing the illegal act of impersonation during the competitive examination conducted by the KPPSC for the post of Tehsildar/Naib Tehsildar from December 4-8, 2018 wherein you were found present in the Examination Centre at Government Higher Secondary School No.3 Peshawar Cantt on the first day of the exam during the English paper appearing in place of Hazrat Noor S/O Jannat Noor Roll No. 1700 (the candidate) and an FIR No.412 dated 04-12-2018 was registered against you and the co-accused by the Police Station Gulberg Peshawar".*


2. In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I, as Competent Authority, dispense with the inquiry and serve you with a Show Cause Notice under Rule-7 of the ibid Rules.

3. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the major penalty under Rule-4 (1) (B) iii. of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011:-

a. **Removal from Service**

4. You are, therefore, required to show cause as to why the aforesaid penalty/penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven (07) days or not more than fifteen (15) days of its delivery, it shall be presumed that you have no defence to put in, and in that case an ex-parte action shall be taken against you.

  
(Imdad Ullah)  
DIRECTOR GENERAL  
INFORMATION & PRs,  
KHYBER PAKHTUNKHWA

**Syed Anwar**  
Assistant (BS-16)  
Directorate General Information & PRs, Khyber Pakhtunkhwa



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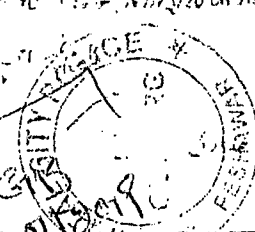
سید انور

71501-7932251

ابتدائی اطلاعی رپورٹ 10344-54211

0336-59182

M. Y. Memon



54011563

تاریخ وقت رپورٹ	4/12/18
مقام کی اطلاع دینے والی شخصیت	پرنسپل سید انور ولد میر عزیزان
مقام کی حالت جرم (موجودہ حال اگر کچھ لیا گیا ہو)	109
جائے وقوعہ یا ملحقہ سے ادرست	168-471
مقام کی حالت	سید انور ولد میر عزیزان (2) حضرت انور ولد حضرت نور خان انور ولد سید انور ولد سید انور ولد
کارروائی پر تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہوا ہو تو وجہ بیان کر دو	پرنسپل سید انور ولد میر عزیزان
انسپیکشن کی تاریخ و وقت	4/12/18

ابتدائی اطلاع نیچے درج کرو جس میں صورت بتانے کے لیے انگریزی میں لکھا گیا ہے۔

انگریزی میں لکھا گیا ہے - 591 تفاتیہ رپورٹ کی جو ذیل ہے -

REPORT OF INVESTIGATION CASE: Memo: - Today on 04-12-2018 at 03:30 PM at CITS No 3 Peshawar Cantt. during examination conducted by the P.K.K. Public Service Commission for the Post of Tele-silder a candidate was caught red handed by the Investigating staff during examination of English Paper instead of Roll No. 1700 namely Mr. Hijari who is a resident of H. No. 26, Street No. 14, Sector E-1, Phase No. I, Peshawar (copy attached). The fake candidate was immediately taken to the Police station Cantt. The accused did not disclose his identity in his possession. The case is forwarded for legal action under Section 418 of the Penal Code as per law. Kindly investigate the accused actual name, whereabouts and inform the Chairman Khyber Pakhtunkhwa Public Service Commission Peshawar. The case and take action as per law. CITS No 3

4-12-18

پرنسپل سید انور ولد میر عزیزان

پرنسپل سید انور ولد میر عزیزان

پرنسپل سید انور ولد میر عزیزان

پرنسپل سید انور ولد میر عزیزان

پرنسپل سید انور ولد میر عزیزان

Annex 11

(37)

کتاب 755 موروثی زمین جو نام ہے اس سے

419-420

468-471-109

صوبہ ہریانہ اور 419 مورثی زمین 118

کتاب 755 مورثی زمین جو نام ہے اس سے

2 سرائے اور مورثی زمین کے نام پر مورثی زمین

گورنر عدالت کے نام سے - مورثی زمین

MASRI PS 68B

11/07/2019

(52) 125

**LIST OF MINOR & MAJOR PENALTIES REFLECTED IN RULES-4 OF KHYBER  
PAKHTUNKHWA GOVERNMENT SERVANTS (EFFICIENCY AND  
DISCIPLINE) RULES, 2011**

**PENALTIES:** - (1) The following are the minor and major penalties, namely:-

**(A) MINOR PENALTIES:-**

- i. Censure;
- ii. Withholding, for a specific period, promotion or increment, subject to a maximum of three years, otherwise than for unfitness for promotion or financial advancement, in accordance with the rules or orders pertaining to the service or post;

Provided that the penalty of withholding increments shall not be imposed on a Government servant who has reached the maximum of his pay scale.

- iii. Recovery from pay of the whole or any part of any pecuniary loss caused to Government by negligence or breach of order.

**(B) MAJOR PENALTIES:-**

\*\*

- i. Reduction to a lower post or pay scale or to a lower stage in a time scale for a maximum period of five (05) years;

Provided that on restoration to original pay scale or post, the penalized Government servant will be placed below his erstwhile juniors promoted to higher posts during subsistence of the period of penalty;"

- ii. Compulsory retirement;
- iii. Removal from service; and
- iv. Dismissal from service.

2. Dismissal from service under the rules shall disqualify a Government servant from future employment under Government.

3. Any penalty under these rules shall not absolve a Government Servant from liability to any other punishment to which he may be liable for an offence, under any other law, committed by him while in service.

**\*\* (Major penalty (b) (i) substituted vide notification NO. SOR-VI (E&AD) 2-6/2010 Dated 18<sup>th</sup> July 2012**

Abdul Ahad

AC 2011/15

To,

The Director General  
Information & PRs  
Khyber Pakhtunkhwa

SUBJECT: REPLY OF THE SHOW CAUSE NOTICE DATED 08-12-2019.

Respected Sir,

In reference of your show cause notice date 08-12-2019, it is revealed to the undersign vide narration and contents of the show cause notice that on the strength of the allegedly registered FIR bearing No 412 dated 04-12-2018 under section "mum" police station Gulberg Peshawar, shown to be registered against the under sign in the manner precisely elaborated in the paragraph of the show cause, the notice served to show cause with the contention that why the major penalty under specific provision of applicable Law i.e. KP Govt

7014  
23-12-19

(DIA) VB  
23-12-2019  
AO

D.T. Put up against  
Relaxed file

23/12/19

Servant (efficiency & discipline) Rules, 2011, may not initiate for removal from service.

It is added herein that the drama sketched therein the contents of the FIR against the undersign is concocted, fictitious, having no legal footing at all, it was thus when got information about the same, the bail petition was rush to preferred before the competent court of criminal jurisdiction and eventually bail was please to grant by Hon'ble court. **(copy of the said order can be produced during the opportunity of personal hearing if so please to approve by your majesty)**

Actually & **firstly**, mere registration of the FIR under any offence even on alleged basis, is fatal to proves the guilt of the nomination therein and it has also settled by the worthy apex courts of Pakistan that no one can be punished, mere on the allegations itself. **Secondly** in absence of any court order, regarding held convicted in the criminal case, the status of the accused always leads privileges of any penalty what so ever, hence the show cause so served is infructuous in nature therefore liable to be recalled. However to the extent of further plea of

88179

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personal hearing, yes it must be availed, to clear very shadow of the letter.

PARYER:

- It is thus concluded that the served show cause notice 08-12-2019 may graciously please be recalled and any action or in-action in the matter of the registration of FIR may placed subject to the final fate through court.

*S. Anwar*  
20/12/2019

Saeed Anwar

Assistant (PBS-16)

Director General Information & PRs Khyber Pakhtunkhwa

56

To

The Hon'ble Director General Information & Public Relations Khyber Pakhtunkhwa. Peshawar.

Subject: REPLY TO THE SHOW CAUSE NOTICE  
BEARING NO. INF/Estt./PF/4675 DATED:  
21.06.2019.

P-119

**Respected Sir,**

With all due respect the reply to the show cause notice is submitted as follows:

1. That I am a duly confirmed and regular civil servant, appointed through Public Service Commission and no such peculiar or special circumstances exist in my case which may warrant dispensation with the regular inquiry proceedings and issuance of show cause notice in the first place.
2. That to adopt the normal process of inquiry is the basic and fundamental right of the replying official.
3. That it is quite surprising for me that I did not receive any explanation, warning, counseling to this date regarding any such allegation nor any fact finding inquiry has been conducted in the matter.
4. That so far as taking part in political activities is concerned, I have not taken part in any political activity and I have not delivered any provoking statement.
5. That I may have participated in some of local Jirgas of my relatives and tribesmen which was essential due to local custom and traditions.

2274  
1-7-19

156 / 90 / 125  
(57)

6. That though a cell phone is exclusive ownership of a person as is mine also but at times when it is not in my possession, it may be used by my family members or even friends. I have never spoken against any institution as I am myself an employee of one of the institution.
7. That I am not a member of any political party or any other organization or group.
8. That I have not committed any act which comes within the meaning of misconduct and I have also not violated any law or rules.
9. That dismissal from service is a very harsh and major punishment and I have committed no such act which could warrant even minor penalty what to talk of the major penalty of dismissal from service.
10. That I have not indulged in any activity nor I have spoken against any institution of the country. I also assure your good self that I will not indulge in future also any activity against any institution of my country.
11. I also want to be heard in person please.

**Lastly, that the undersigned is an efficient government servant and was recruited through Public Service Commission on the top of the merit list. I have always tried my level best to fulfill my duties in accordance with law. All my ACR's and my previous service record testify to my unblemished and dedicated work. The same**



157 / 126  
②⑧

can be verified from my worthy reporting officers and superiors. I reiterate of my resolve to be an efficient civil servant.

*I also assure your honor that I will ensure not to occasion any chance of displeasure to my Honorable superiors in future.*

*Despite the above facts, in the eyes of my competent authority, if I have unintentionally, made any mistake, I submit my apology for that.*

I also assure you that I will be more careful about my private facebook account and will not allow anyone to misuse it in future.

In view of the above submissions to the show cause notice, your honor is requested to kindly withdraw the show cause notice and exonerate the replying official from the charge leveled against him, and the suspension order may also kindly be withdrawn.

I hope your honor will give me a chance to continue my services and will help me in building a bright service career.

Thanks

Yours Obediently



**SYED ANWAR**

Assistant, Office of Directorate  
General Information & Public Relations



**DIRECTORATE GENERAL INFORMATION & PRs  
KHYBER PAKHTUNKHWA PESHAWAR**

No. INF/Estt./1-28/\_\_\_\_\_  
Dated Peshawar the \_\_\_\_/\_\_\_\_/2020

59

**OFFICE ORDER**

WHEREAS, Mr. Syed Anwar s/o Mir Khanan, Assistant (BPS-16), Directorate General Information & PRs, Khyber Pakhtunkhwa was proceeded against under the Khyber Pakhtunkhwa, Government Servant (Efficiency and Discipline) Rules, 2011 on the charges mentioned in the Show Cause Notice.

2. NOW, THEREFORE, I, Imdadullah as the Competent Authority (Director General, Information and PRs, Khyber Pakhtunkhwa), after having considered the charges, evidence on record, reply of the accused official as well as previous record, in exercise of powers conferred under Rule 7 (f) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 have imposed the major penalty of "Removal from Service" upon Syed Anwar, Assistant (BPS-16).

-Sd/-

**DIRECTOR GENERAL  
INFORMATION & PUBLIC RELATIONS,  
KHYBER PAKHTUNKHWA**

Dated Peshawar, the 7/1/2019

Endst: No. INF/Estt./1-28/129-36

Copy forward to the:

1. Accountant General, Khyber Pakhtunkhwa
2. PS to Secretary Information & PRs, Govt. of Khyber Pakhtunkhwa
3. PS to Director General Information & PRs, Khyber Pakhtunkhwa
4. Section Officer (Establishment), Information & PRs Department, Govt. of Khyber Pakhtunkhwa
5. Syed Anwar, Village land Syedabad, Tehsil Datta Khel, Miran Shah, North Waziristan
6. Bill Clerk
- ✓ 7. Personal file of the official
8. Office Order file

*Hasnain Agha*  
**DIRECTOR INFORMATION  
FOR DIRECTOR GENERAL**

80/182

Secretary Information

Diary No 3928 Date 3-2-2020

To

The Secretary Information  
Government of Khyber Pakhtunkhwa  
Peshawar

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 07/01/2020 WHEREBY THE APPELLANT HAS BEEN REMOVED ILLEGALLY FROM SERVICE.

Prayer:

On acceptance of the instant departmental appeal, the appellant may kindly be reinstated into service with all back benefit by setting aside the impugned order dated 07/01/2020

Respected Sir.

The appellant submits as under;

1. That the appellant was serving as Assistant (BPS-16) in your departmental and since his appointment the appellant served the department with great zest, zeal and enthusiasm.

2. That while serving in the same capacity, the appellant was served with a show cause notice, containing some baseless allegations, which was replied by the appellant negating the same. (Copy of show cause notice and reply are attached as annexure "A" & "B").

3. That a concocted and false FIR was also registered against the appellant and when the appellant came to know about the same the appellant got bail from the court of competent

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Handwritten notes and signatures in the middle of the page, including a signature and some illegible text.

81/183

jurisdiction. (Copy of the FIR and court order are attached as annexure C & D)

4. That, the utter surprise of the appellant, the appellant was removed under the law of jungle, without issuing any charge sheet or conducting regular inquiry or affording an opportunity to defend himself. (Copy of the impugned order is attached as annexure E)

5. That the appellant, having no other adequate remedy, hence filling the instant appeal on the following grounds:

GROUNDS:

A. That the impugned order is against the law, rules principles of Natural Justice, void ab-initio, hence liable to be set aside.

B. That though the finding inquiry has been shown to be conducted by the appellant, however no such inquiry has been conducted by the appellant, hence the fact that fact is not proved by the appellant.

C. That the order is issued without any authority.

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- D. That no regular inquiry has been conducted which is mandatory before awarding major penalty.
- E. That no statement of any witness was recorded and opportunity of cross has been provided to the appellant.
- F. That though FIR was registered against the appellant however the competent authority, without waiting for outcome of the trial, issued the impugned order in a cursory manner.
- G. That the allegations leveled against the appellant are false, frivolous and based on malafide and that is no single piece of evidence against the appellant.
- H. That the frivolous allegations were required probe however no such probe was conducted nor did the appellant was confronted with anything.
- I. That right of fair trial has not been provided to the appellant as guaranteed by Article 10-A of the constitution of Islamic Republic of Pakistan, 1973.
- J. That no opportunity of personal hearing has been provided which is evident from the impugned order.
- K. That since the impugned order the appellant is jobless.

3 185

L. That the appellant has not been treated in accordance with Article 25 of the constitution of Islamic republic of Pakistan, 1973.

It is, therefore, most humbly prayed that on acceptance of this departmental appeal may kindly be accepted as prayed for in the heading of the appeal

Applicant



Syed Anwar

23/1/20

Assistant (BPS 16)

AO

23/1/20

MUST IMMEDIATE /  
COURT MATTER



TIME LIMIT CASE      OUT TODAY  
**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ESTABLISHMENT DEPARTMENT**  
**(JUDICIAL WING)**

64

No: SO(Lit-III)E&AD/3-23/2020  
Dated: Peshawar, the 17<sup>th</sup> August, 2020

To.

The Secretary to Govt. of Khyber Pakhtunkhwa,  
Information Department,  
Peshawar.

Subject: APPEAL NO. 5304/2020 - SYED ANWAR VS GOVERNMENT OF  
KHYBER PAKHTUNKHWA & OTHERS.

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith copy of Notice dated 27.07.2020, received from Registrar, Khyber Pakhtunkhwa, Service Tribunal Peshawar, with the request to depute an Officer (not below the rank of BPS-17) well conversant with the facts of the case to brief the Additional Advocate General, Khyber Pakhtunkhwa, Service Tribunal alongwith relevant record and to assist him before the Court on 18<sup>th</sup> September, 2020. The proceedings of the court may kindly be intimated to this Department accordingly for perusal of the Competent Authority, please.

(Encl: As Above:)

Yours faithfully,

Section Officer (Litigation-III)

Endst: of Even No' & Date:

Copy forwarded to the:-

1. P.S to Secretary, Establishment Department.
2. P.S to Special Secretary, Establishment Department.
3. P.A to Additional Secretary (Judicial), Establishment Department.
4. P.A to Deputy Secretary (Judicial), Establishment Department.
5. Master file.

Section Officer (Litigation-III)

AS.  
22/8/20  
D.S.(A)

24/8/20

So. Ad  
24/08

266-3114 25/08/2020

65

3-23

"B"

WYAPRI PAKHTUNKHTWA SERVICE TRIBUNAL, PESHAWAR.  
OFFICIAL OFFICE (L.D.), KHYBER ROAD,

4571 w/E  
13-08-2020

5804

4th Section, E-50  
Dist No 340  
Date 12-8-2020

Appellant/Petitioner  
Sayed Anwar

Respondent  
Chief Secy Govt of KPK

Respondent No. I  
Chief Secretary Govt of KPK  
Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in pursuance of which the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal on 18/09/2020 at 10:00 AM. If you wish to urge anything against the award of the court, it is your duty to do so on the date fixed, or any other day to which the matter is postponed. This is done by or by authorised representative of your party. You are therefore required to file in this Court, before the date of hearing 4 copies of written statement/objection in support of your case. Please use self-addressed mail in return of the said statement. The matter is mentioned in the margin of the present notice.

Notice of the hearing of this appeal/petition will be given to you by registered post. In the event of any change in your address, you should inform the Registrar of any change in your address. It is your duty to provide your correct address and other details which are necessary for the purpose of the purchase of stamps.

A copy of appeal has already been sent to you in this office notice dated.....

Given under my hand and the seal of this Court, at Peshawar this 27th

Day of July 2020.

AS (S)  
13/8  
13/8

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.



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Secretary Information

Diary No 3928 Date 3-2-2020

To

The Secretary Information  
Government of Khyber Pakhtunkhwa  
Peshawar

Subject:- DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 07/01/2020 WHEREBY THE APPELLANT HAS BEEN REMOVED ILLEGALLY FROM SERVICE.

Prayer:

On acceptance of the instant departmental appeal, the appellant may kindly be reinstated into service with all back benefit by setting aside the impugned order dated 07/01/2020

Respected Sir,

The appellant submits as under;

1. That the appellant was serving as Assistant (BPS-16) in your departmental and since his appointment the appellant served the department with great zest, zeal and enthusiasm.

2. That while serving in the same capacity, the appellant was served with a show cause notice, containing some baseless allegations, which was replied by the appellant negating the same. (Copy of show cause notice and reply are attached as annexure "A" & "B").

3. That a concocted and false FIR was also registered against the appellant and when the appellant came to know about the same the appellant got bail from the court of competent jurisdiction.

*[Handwritten signatures and scribbles]*

*[Handwritten notes and scribbles]*

(67)

183

jurisdiction. (Copy of the FIR and court order are attached as annexure C & D)

4. That, the utter surprise of the appellant, the appellant was removed under the law of jungle, without issuing any charge sheet or conducting regular inquiry or affording an opportunity to defend himself. (Copy of the impugned order is attached as annexure E)
5. That the appellant, having no other adequate remedy, hence filling the instant appeal on the following grounds:

G R O U N D S:

- A. That the impugned order is against the law, rules principles of Natural Justice, void ab-initio, hence liable to be set aside.
- B. That though fact finding inquiry has been shown to be conducted against the appellant however no such inquiry has been conducted. It is worth mentioning that fact finding inquiry has no where mentioned in E & D rules 2011 or in any other laws.
- C. That no charge sheet alongwith statement of allegation was issued, nor did opportunity of defence has been provided to the appellant.

68

184

- D. That no regular inquiry has been conducted which is mandatory before awarding major penalty.
- E. That no statement of any witness was recorded nor opportunity of cross has been provided to the appellant.
- F. That though FIR was registered against the appellant however the competent authority, without waiting for outcome of the trial, issued the impugned order in a cursory manner.
- G. That the allegations leveled against the appellant are false, frivolous and based on malafide and that is no single piece of evidence against the appellant.
- H. That the frivolous allegations were required probe however no such probe was conducted nor did the appellant was confronted with anything.
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- K. That since the impugned order the appellant is jobless.

69

183

L. That the appellant has not been treated in accordance with Article 25 of the constitution of Islamic republic of Pakistan, 1973:

It is, therefore, most humbly prayed that on acceptance of this departmental appeal may kindly be accepted as prayed for in the heading of the appeal

Applicant



Syed Anwar

23/1/20

Assistant (BPS 16)

طہور احمد داؤد القان ▶ Syed Anwar Khan Dawar

6 hrs · 🌐

40

40

Dear Sir Sayed Anwar first of all Red salute to U don't worry about the money we R standing and stand by with U everyone inshallah

Syed Anwar Khan Dawar

10 hrs · 🌐

اور ی پوری پہ منصب پہ نوکری شہ  
جی تر فہم و عقل زہ د مغل تک ہم  
چہ منصب می د مغل خورو ملک ووم  
جی منصب د مغل نشہ اوس ملک ہم

55 124

(71)

Syed Anwar Khan Dawar  
June 19 at 10:15 AM

DG ISI Faiz Hameed met Prime Minister Imran Khan today. Both thanked each other for appointing each other.

آج ایس آئی کے ایف ایچ ایف ایچ نے وزیر اعظم عمران خان سے ملاقات کی۔  
دونوں نے ایک دوسرے کو تعینات کرنے پر ایک دوسرے کا شکریہ ادا کیا



Syed Anwar Khan Dawar  
June 17 at 10:40 AM

یہ کس قسم کا جج ہے؟ کہ اج علی وزیر کے  
پیشی کے اہم موقع پر چھٹی پر گیا۔ کیا اس  
عدالتی نظام سے آپ لوگ خوش ہیں؟

64

14 Comments 23 Shares

72

125

58

Shafiq Zaman Waziri is with Ariana Marwat Pashtoon.  
June 15 at 2:03 PM

کیا آپ لوگوں سے کہیں اس بات پر غور کیا ہے کہ اسٹیٹمنٹ اب تک ہی ٹی ایچ کے ہیں اور نہ ہی ان کے پاس  
ایچیک ہارڈ کے کوئی گینڈا پڑا ہے  
?The time is up for PTM

بات یہ ہے کہ اسٹیٹمنٹ کو نہ اس دورے سے کوئی خاص تکلیف تھی کہ "یہ جو نشست گری ہے اس کے پیچھے  
ورڈس ہیں" اور نہ یہ دورہ ان پر چھٹا کرنا گوارا تھا کہ "یہ گریل جو ٹی ایچ نشست گری" اور "اے او ایس یو ایشن" بلکہ  
اسٹیٹمنٹ الٹا اس دورے سے توڑ کر تیار کیا گیا ہے کہ ٹیکسوں اور ٹیکس کے عینہ والے لوگ ہیں ہی تو ایچ کے ٹی ایچ کے ٹی ایچ کے  
ٹو ملکہ دشمن ایجنٹ اور اداروں کی توڑیں کیے بل جواز بد اس سے برکات کی رہیں ہیں کیونکہ یہ توڑ کے ہوتے ہیں  
اپریل 2017 سے ہیں ان کی مشکلات کا اندازہ ہے توڑ کی خاطر انہوں نے بڑی قربانیاں دی ہیں مگر  
اسٹیٹمنٹ کی یہ بات نہیں جمع کر کے سے زیادہ کہہ رہے ہیں اگر تو اسٹیٹمنٹ والی سٹیٹمنٹ تھی کہ ان لوگوں سے  
وفاقی بین الاقوامی اور خصوصی (مہلتی) ہوں تو ہر ان کے ایک تو مطالبات مان کر ان کے راجوں پر سرحد رکھ کر ان  
کے غرور و عجب کو ٹھنڈا کیا جاتا مگر اسٹیٹمنٹ سے اب تک ہی ٹی ایچ کا کوئی بھی ایسا مطالبہ حل نہیں کیا جس سے  
لگے کہ اسٹیٹمنٹ واقعی ان مطالبات کے بارے میں سنجیدہ تھی۔

اب سوال یہ ہے کہ پھر یہ چونکہ اسٹیٹمنٹ کو توڑ ہی ٹی ایچ سے آئی ہوتی ہے یا نہیں لگتی ہے؟ سیدنا کوئی  
مترنا، لوگوں کو پتہ چلا، کوئی لوگیا مطالبہ پر پھرتا تھا کہ اسے منسحب ایم این اے کو یہ صرف ارد و کوپ کر کے ہٹا  
پارلیمنٹ کو اعتماد میں لیتے ہیں سچوں کے پیچھے ڈانڈا لہی اسٹیٹمنٹ کی اس ٹر ایسٹی ٹیبل کی پیچھے رہ گیا؟

تو بات یہ ہے کہ ہی ٹی ایچ میں یہ بات لڑ رہی تھی کہ وزیر سکن اور وفاقی حلقوں کی جو مطالبات ہیں ان کے  
کٹریٹ کی اس سے کس کو شرفیاد پر لیتے؟ مقصدی لوگوں کا ہی میں رائی کیا ہے؟ ان مطالبات کیلئے پیش ہیں  
وزیر سکن کی بجائے جو سب سے سچے ہیں کیوں لگاتے جا رہے ہیں اور وزیر سکن کی جو سب سے سچے ہیں  
اس کی ایک اور شکل دکھانے ہیں توڑ ہی ٹی ایچ سب کو اس بات پر تیار کیا کہ ان کٹریٹ اور شعبوں پر پارلیمنٹ  
میں بات ہیں لہذا ان کی موجودگی کو ہٹا کر جانے، علی وزیر اور محسن داوڑ سے جتنے میں جا کر سر پر لگنا کر  
بات ہی توڑ توڑوں ہی ان مطالبات سے متعلق شعور و آگہی مہم کا آغاز کیا تو جب بات ہونے لگی اور اسٹیٹمنٹ کے  
مطالبات سے ٹکرائی ہی ہیں اسٹیٹمنٹ نہ تو چھوڑی حکومتوں کو چلتا کر کے سے ہٹا دیتی ہے نہ آویں گے بد  
اسی آویں کو ہٹا کر ہے اور توڑوں کو سے لے کر اس سے تو اسٹیٹمنٹ کا موجودہ سخت رویہ ہی دکھ رہی  
نہایت ہوگا، اب کس چھوڑے، آپ کے کرو مہلت، کہیں، گویا، کیا اور لگنے کے لشکر بڑے کدے کی جڑ ہے آپ ان  
دھار کی اور سب کے دھار سے نسبت بردن جو ہلی شروع ہو رہی ہیں ٹی ایچ کے ہٹا دینے کے لئے ہی  
پڑا ہی پڑا تو عرصے میں یہ تیار کیا۔

Syed Anwar Khan Dawar and 11 others

1 Share

Syed Anwar Khan Dawar  
June 14 at 2:01 PM

14 جون سیاہ دن  
شمالی وزیرستان کے بے گناہ لوگوں پر گولہ بارود اور  
لڑاکا طیاروں سے بمباری، لوگوں کو بے سرو سامان  
گھروں سے نکال کر بنوں تک پھیل جائے پر مجبور کیا  
گیا۔ مریض راستے میں فوت ہو گئے۔ گھروں اور  
دکانوں کا سارا سامان چوری

1 Comment 3 Shares

25