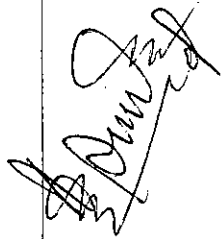


S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	07.07.2021	<p style="text-align: center;">KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, <u>PESHAWAR.</u></p> <p style="text-align: center;">Service Appeal No. 15960/2020</p> <p>Khalid Khan son of Qadeem Khan Ex-Moharrir/Junior Clerk Senior Civil Judge, Mardan R/O Dobcha Koroona Tehsil and District Charsadda. ... Appellant.</p> <p style="text-align: center;"><u>Versus</u></p> <p>1. District & Sessions Judge, Mardan and one other. ... Respondents</p> <p>Mr. Muhammad Saeed Khan, Advocate for appellant present. Preliminary arguments heard and record perused.</p> <p>2. The appellant through his appeal has impugned order dated 18.08.2020, wherein allegations against the appellant/accused have been discussed in detail. It was observed by the Competent Authority that the accused official had a foul-smelling service career; that he did not mend his ways despite warnings, censures and communication of adverse remarks in more than one PERs etc; that he did not reform himself even after a very clear ruling of the Honourable Peshawar High Court in Department Appeal No. 09/2008, wherein he was warned to the extent that if he did not exhibit carefulness in future, severe action of major penalty would be taken against him; and that in the under lying event, he was caught red handed. A learned Judicial Officer,</p>

whose report was quite clear, detailed and speaking. It was concluded that the delinquent official was afforded opportunity of personal hearing but he could not rebut the overwhelming material found placed on the file nor could he prove himself innocent or that he was not involved in the issue under discussion in any manner rather he had been requesting for taking lenient view. The Competent Authority because of his blemished record and the severity of the incident of demanding bribe from a poor old person and making him wait till 5.00 PM just for illegal personal gains, had not considered the request for lenient view and on holding the accused/official guilty of misconduct found imposition of the penalty/befitting as suggested in the final show cause notice issued to him. Therefore, major penalty of removal from service was imposed upon him.



3. There being no need to discuss the merits, suffice it to mention without dilating upon the factual account of proceedings in detail that the disciplinary action against the appellant commenced from issuing of show cause notice dated 29.06.2020. The said notice enumerates two grounds including one that Mr. Ijlal Hussain, learned Civil Judge/Judicial Magistrate, Takht Bhai was appointed as Enquiry Officer who verified the allegations contained in the complaint and to take other steps deemed appropriate by him; and the second was that the enquiry officer, after taking certain steps, submitted his report (copy annexed) holding the appellant to be guilty of demanding and receiving of bribe. The said two grounds were considered for dispensing with

formal enquiry against the accused official and he was issued direct show cause notice for proceedings under Rule 7 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011. The copy of the preliminary enquiry and that of the complaint were enclosed with the show cause notice. Needless to say that dispensing with enquiry and proceedings for disciplinary action by direct issuing of the show cause notice under Rule 7 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011 are permitted under the law but where the factual account of allegations require pro & contra evidence; dispensing with the inquiry is likely to infringe the right of accused official for fair trial.

4. The action against the appellant culminating into imposition of major penalty was outcome of a complaint filed by a third person followed by his purported entrapment under supervision of Mr. Ijlal Hussain, learned Civil Judge/Judicial Magistrate to confirm the acceptance of illegal gratification as complained against him i.e. the accused/appellant. Obviously, the accused had got right to contest the complaint filed against him and also the enquiry report based on entrapment proceedings; but it was only possible, if a formal enquiry had been conducted. The shorter procedure resorted to by the Competent Authority against the accused official obviously resulted into infringement of his fundamental right of the accused official for fair trial within the meaning of Article 10-A of the Constitution of Islamic Republic of Pakistan.

[Handwritten signature]

5. The imposition of major penalty in absence of holding of trial of accused official through formal enquiry, is held not maintainable without touching merits of the case. When the disposal of the appeal on technical ground is not going to affect the right of any party in terms of merits, it will serve no purpose to refer the case to D.B. Linking the reinstatement of appellant and back benefits with the outcome of the formal enquiry, the impugned order to the extent of findings therein under Paragraph 16 is set aside. Consequently, the case is remanded to the respondent No. 1 for the requirement of formal enquiry as prescribed under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011. This order shall not restrict the respondents to rest with the charges reflected in the show cause notice directly issued under Rules 7. It will be open for the competent Authority to formulate the charge sheet and statement of allegations as deemed fit in light of record and information available before him. As the reinstatement of the appellant has been withheld for want of outcome of denovo enquiry, therefore, it is expected that the enquiry shall be conducted and concluded as soon as possible but positively within sixty days of the receipt of this order.

6. The appeal is disposed of in limine in the above terms. File be consigned to the record room.


(AHMAD SULTAN TAREEN)
Chairman

ANNOUNCED
07.07.2021

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No. 15960 /2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 16535

Dated 16/12/2020

Khalid Khan son of Qadeem Khan
Ex-Moharrir/ Junior Clerk
Senior Civil Judge, Mardan
R/O Dobcha Koroona, Tehsil and District Charsadda

Appellant

Versus

- 1) District and Sessions Judge, Mardan.
- 2) Registrar, Peshawar High Court, Peshawar

Respondents

Appeal u/s 4 of the N.W.F.P Service Tribunal Act, 1974 against the impugned order dated 18.08.2020 whereby the learned District and Sessions Judge, Mardan, being the competent authority imposed the major penalty of removal from service under Rule-4(b)(iii) Khyber Pakhtunkhwa Government Servant (E&D) Rules, 2011, on charges of misconduct against which departmental appeal dated 24.08.2020 was filed before the Appellate Authority, which has not been responded despite lapse of statutory period of 90 days, hence presents this appeal within 30 days after expiry of 90 days period which is well within time.

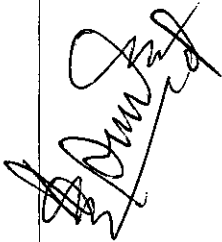
Filed to-day

[Signature]
Registrar

16/12/2020

S.No.	Date of order/ proceedings	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	07.07.2021	<p style="text-align: center;">KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, <u>PESHAWAR.</u></p> <p style="text-align: center;">Service Appeal No. 15960/2020</p> <p>Khalid Khan son of Qadeem Khan Ex-Moharrir/Junior Clerk Senior Civil Judge, Mardan R/O Dobcha Koroona Tehsil and District Charsadda. ... Appellant.</p> <p style="text-align: center;"><u>Versus</u></p> <p>1. District & Sessions Judge, Mardan and one other. ... Respondents</p> <p>Mr. Muhammad Saeed Khan, Advocate for appellant present. Preliminary arguments heard and record perused.</p> <p>2. The appellant through this appeal has impugned order dated 18.08.2020, wherein allegations against the appellant/accused have been discussed in detail. It was observed by the Competent Authority that the accused official had a foul-smelling service career; that he did not mend his ways despite warnings, censures and communication of adverse remarks in more than one PERs etc; that he did not reform himself even after a very clear ruling of the Honourable Peshawar High Court in Department Appeal No. 09/2008, wherein he was warned to the extent that if he did not exhibit carefulness in future, severe action of major penalty would be taken against him; and that in the under lying event, he was caught red handed. A learned Judicial Officer,</p>

whose report was quite clear, detailed and speaking. It was concluded that the delinquent official was afforded opportunity of personal hearing but he could not rebut the overwhelming material found placed on the file nor could he prove himself innocent or that he was not involved in the issue under discussion in any manner rather he had been requesting for taking lenient view. The Competent Authority because of his blemished record and the severity of the incident of demanding bribe from a poor old person and making him wait till 5.00 PM just for illegal personal gains, had not considered the request for lenient view and on holding the accused/official guilty of misconduct found imposition of the penalty/befitting as suggested in the final show cause notice issued to him. Therefore, major penalty of removal from service was imposed upon him.



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Amir Jafar

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6. The appeal is disposed of in limine in the above terms. File be consigned to the record room.


(AHMAD SULTAN TAREEN)
Chairman

ANNOUNCED
07.07.2021

10.05.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 25.08.2021 for the same as before.

Early applicatn is accepted and fixed for 07/07/2021.



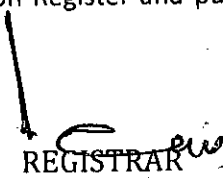
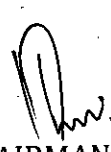
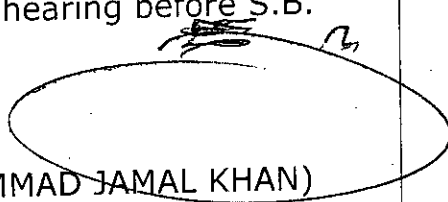
Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 15950 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	16/12/2020	<p>The appeal of Mr. Khalid Khan presented today by Mr. Muhammad Saeed 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>29/01/2021</u></p> <p style="text-align: right;"> CHAIRMAN</p>
2-	29.01.2021	<p>Appellant is present alongwith Mr. Jamal Khan, Advocate.</p> <p>Junior to senior counsel submitted that the senior counsel is busy in the Hon'ble Peshawar High Court, Peshawar, and requested for adjournment. Request is allowed. The appeal is adjourned to 10.05.2021 on which date file to come up for preliminary hearing before S.B.</p> <p style="text-align: right;"> (MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL)</p>

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No. ____/2020

Khalid Khan..... Appellant

Versus

District and Sessions Judge, Mardan & another..... Respondents

I N D E X

S.No.	Description of documents.	Annexure	Pages.
1	Grounds of appeal.		1-7
2	Affidavit.		8
3	Addresses of the parties.		9
4	Copy of appointment order dated 19.07.2003.	A	10-11
4	Copy show cause notice dated 29.06.2020.	B	12
6	Copy of reply dated 07.07.2020	C	13-14
7	Copy of departmental appeal dated 24.08.2020 filed before Appellate Authority	D	15-20
8	Copy of impugned order dated 18.08.2020.	E	21-35
9	Copy of affidavit	F	36
12	Wakalatnama.		37


Appellant

through


Muhammad Saeed Khan
Advocate High Court

Dated: 14.12.2020

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No. 15960 /2020

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 16535

Dated 16/12/2020

Khalid Khan son of Qadeem Khan

Ex-Moharrir/ Junior Clerk

Senior Civil Judge, Mardan

R/O Dobcha Koroona, Tehsil and District Charsadda

..... Appellant

Versus

- 1) District and Sessions Judge, Mardan.
- 2) Registrar, Peshawar High Court, Peshawar

..... Respondents

Appeal u/s 4 of the N.W.F.P Service Tribunal Act, 1974 against the impugned order dated 18.08.2020 whereby the learned District and Sessions Judge, Mardan, being the competent authority imposed the major penalty of removal from service under Rule-4(b)(iii) Khyber Pakhtunkhwa Government Servant (E&D) Rules, 2011, on charges of misconduct against which departmental appeal dated 24.08.2020 was filed before the Appellate Authority, which has not been responded despite lapse of statutory period of 90 days, hence presents this appeal within 30 days after expiry of 90 days period which is well within time.

Filed to-day

Registrar

16/12/2020

Prayer:

On acceptance of this service appeal, the impugned order dated 18.08.2020 may kindly be set aside and the appellant may please be reinstated in service with all arrears/ consequential back benefits. Any other relief to whom the appellant is found entitled during course of hearing may also be granted.

Respectfully Sheweth;

Brief facts giving rise to the instant appeal are as under:-

- 1) That the appellant was appointed as Junior Clerk in BPS-5 on 19.07.2003 by order of Respondent No.1. (Copy of appointment order is Annexure "A").
- 2) That the appellant has more than 17 years service at his credit at the time of imposition of major penalty of removal from service.
- 3) That respondent No.1 District and Sessions Judge, Mardan issued show cause notice dated 29.06.2020 wherein allegation of demanding and taking bribe in which reply was called from the appellant with further observation as to why the major penalty of removal or dismissal from service as provided in section 4(i)(b)(iii)&(iv) should not be imposed upon you. (Copy show cause notice dated 29.06.2020 is attached as Annexure "B")
- 4) That the appellant in response to the show cause notice dated 29.06.2020, submitted a detailed reply dated 07.07.2020 before respondent No.1 by refuting the allegations. (Copy of reply dated 07.07.2020 is attached as Annexure "C").

5) That the appellant preferred his departmental appeal dated 24.08.2020 against the impugned order dated 18.08.2020 before the appellate authority, which has not been responded despite lapse of statutory period of 90 days, hence files this service appeal before this Hon'ble Services Tribunal within the stipulated period of 30 days as per mandate of law. (Copy of departmental appeal dated 24.08.2020 filed before Appellate Authority is attached as Annexure "D" and impugned order dated 18.08.2020 is attached as Annexure "E").

GROUND FOR APPEAL:

That the appellant being aggrieved from the impugned order dated 18.08.2020 referred above, prefers the instant service appeal on the following amongst other grounds for his reinstatement in service with all consequential back benefits/ arrears of pay.

- a) That the impugned order of respondent No.1 is against the law, facts and material available on record, hence not tenable in the eyes of law and also violative of Article 4 of the Constitution of Islamic Republic of Pakistan.
- b) That the impugned order is also violative of section 24-A of General Clauses Act as the competent authority failed to pass a speaking order with reasons.
- c) That competent authority has initiated the summary proceedings on the basis of vague and unspecific allegations and inquiry was dispensed with without assigning any reason or cause while making observations that the undersigned is corrupt and ill-reputed. Such remarks should have been avoided in the absence of any supporting material, which could be only collected during holding a regular inquiry.

- d) That even no **final show cause notice** was served upon the appellant nor a **meaningful opportunity of personal hearing** was afforded to the appellant which is a flagrant violation of Khyber Pakhtunkhwa Government Servant (E&D) Rules, 2011 and also offending the well recognized principles of natural justice which by itself sufficient to vitiate the entire proceedings carried out against the appellant at his back.
- e) That no statement of allegation was supplied nor any charge sheet was served upon the appellant, which is a glaring illegality and bypassing the mandatory procedure given in the Khyber Pakhtunkhwa Government Servant (E&D) Rules, 2011. It is pertinent to mention that the whole disciplinary process was conducted by respondent No.2 in haste as he served the memo of allegation, show cause notice and passed the impugned dismissal order on the basis of allegations of corruption and corrupt practice which could not be warranted/ sustainable at all within the four corners of law. The competent authority cannot act as complainant/ inquiry officer/ imposing the penalty of dismissal at one and the same time as he was legally required to either constitute an inquiry committee or to conduct inquiry through an inquiry officer and thereafter on the basis of the finding of inquiry committee or inquiry officer the proposed penalty could either be confirmed or otherwise.
- f) That the issuance of show cause notice, in the circumstances of the matter, especially in the light of denial of the so-called complainant that neither the appellant had demanded the alleged amount from him nor he paid the same to the appellant and further the he had never lodged the complaint.

- g) That in the light of stated circumstance, the matter needed detailed inquiry and the authority was supposed to have issued the charge sheet and to hold detailed inquiry.
- h) That dispensation of inquiry premised upon show cause notice dated 29.06.2020 tantamount to restricting the scope of Article 10-A of the Constitution of Islamic Republic of Pakistan, 1973 and as such is uncalled for, against the law/ rules and jurisprudence governing the state of Islamic Republic of Pakistan.
- i) That the show cause notice referred to **personal knowledge** and **discrete inquiry report**. It is pertinent to mention that there is no room/ scope for personal knowledge or discrete inquiry report in Khyber Pakhtunkhwa Government Servant (E&D) Rules, 2011, therefore, any finding on the basis of such inquiry report or personal knowledge cannot be equated with the **standard of proof** required to be brought on record viz-a-viz the allegations. It is further stated that whenever there are disputed questions of facts, holding of regular inquiry cannot be dispensed with, as principle of natural justice requires to provide sufficient opportunity of defence and opportunity of cross examination. Nobody can be penalized without adhering to the concept of due process of law, which also offends the mandatory provisions of **Article 10-A of the Constitution of Islamic Republic of Pakistan**, therefore, the show cause notice and the impugned dismissal order alone is not tenable on this ground.
- j) That no specific order to the effect to dispense with the regular inquiry passed by the competent authority, therefore, an element of bias could not be ruled out altogether in the given facts and circumstances of the case. Even no reason of dispensing with the regular inquiry mentioned in the show cause notice.

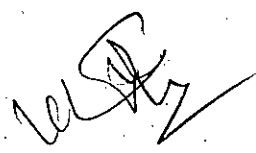
- k) That the competent authority was required under the rules to conduct a regular inquiry through an inquiry officer or inquiry committee which procedure has altogether been scrapped and acted as complainant, inquiry officer and judge by imposing the penalty of dismissal from service in a fashion alien to law which functions could not be validly undertaken by the competent authority alone. Hence the entire proceedings from start to the end stand vitiated/ void ab-initio.
- l) That even no mandatory final show cause notice was served upon the appellant before imposition of major penalty hence the impugned order cannot be sustainable alone on this ground as well. It is further stated that under the rules the competent authority could only dispense with an inquiry proceeding if the accused civil servant is involved to endanger the security of Pakistan or entered into plea-bargain under any law for the time being in force or involved in subversive activities, otherwise, the procedure of regular inquiry cannot be dispensed with hence the referred provision of law in the impugned show cause notice/ order has been misconstrued by the competent authority.
- m) That no inquiry report as referred to, in the show cause notice or incriminating material which were used against the appellant were provided, which need to be disclosed to him during holding a regular inquiry to explain his position and rebut the same. It is settled law that when a document was relied upon for the purpose of arriving at a certain finding without disclosing the same to the appellant, then any finding on such basis without disclosing to the appellant would be against the norms of justice, fair play/ equity. Thus, the documents relied upon, if any, in one sided/ ex parte manner would offend not only

the established principles of natural justice but also violating the due process of law, which concept deeply embedded in our judicial system to administer justice. It is pertinent to mention that on whose alleged complaint, the appellant removed from service, he sworn affidavit that I have not made any complaint against appellant. (Copy of affidavit is attached as Annexure "E").

- n) That any other ground will be raised at the bar with kind permission of this Hon'ble Tribunal.

Keeping in view, what has been stated above, it is, therefore, humbly requested the impugned order dated 18.08.2020 may kindly be set aside and the appellant may please be reinstated in service with all arrears of pay/ consequential back benefits.

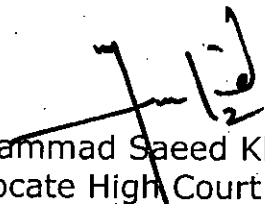
Any other relief, which has not been specifically asked for and to whom the appellant is found entitled may also be granted.



Appellant

Dated: 14.12.2020

Through


Muhammad Saeed Khan
Advocate High Court

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No.____/2020

Khalid Khan..... Appellant

Versus

District and Sessions Judge, Mardan & another..... Respondents

AFFIDAVIT

I, **Khalid Khan** son of Qadeem Khan Ex-Moharrir/ Junior Clerk Senior Civil Judge, Mardan R/O Dobcha Koroona, Tehsil and District Charsadda do hereby affirm and declare on oath that the contents of the application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent
CNIC No.17101-2578176-9

16 DEC 2020
ATTESTED

Advocate High Court Peshawar

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No. ____/2020

Khalid Khan..... Appellant

Versus

District and Sessions Judge, Mardan & another..... Respondents

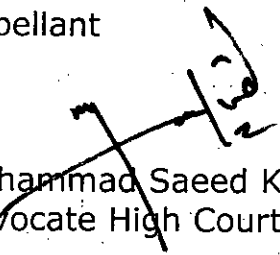
ADDRESSES OF THE PARTIES

APPELLANT:

Khalid Khan son of Qadeem Khan
Ex-Moharrir/ Junior Clerk
Senior Civil Judge, Mardan
R/O Dobcha Koroona, Tehsil and District Charsadda

RESPONDENTS:

- 1) District and Sessions Judge, Mardan.
- 2) Registrar, Peshawar High Court, Peshawar

Appellant
through

 Muhammad Saeed Khan
 Advocate High Court

Dated: 14.12.2020

APPOINTMENT ORDERS.

Annexure
"A"

10

In pursuance of the Peshawar High Court, Peshawar Notification bearing No.D.1/(ADMN)/HE/43-A-14/2002, dated Peshawar the 14th November, 2002, r/w Peshawar High Court Peshawar, letter No.4313-4360, dated Peshawar the 19-4-2003, on the recommendations of the Departmental Selection Committee, you are appointed as Junior Clerk in BPS.NO.5, on the term and conditions to the effect that your appointment shall be purely on temporary basis, subject to the production of Medical fitness certificate, shall Governed by the Efficiency and Discipline Laws and Rules and on the completion of period of probation, which shall however, be liable to termination without assigning any reason, thereto.

- 1- Hadeem Son of Abdul Qayum R/O
Civil Hospital Quarter Shamsi Road, Mardan.
- 2- Saifur Rehman Son of Abdul Hanan R/O
Village Umar Abad Post Office Sardheri,
Tehsil and District Charsadda.
- 3- Khalid Khan Son of Qadeem Khan R/O
Village Debcha Koroona Post Office Kumban
Killi Tehsil and District Charsadda.
- 4- Hafiq Fakhru Alam R/O Behram Khan, O/O
Behram Khan Purnation House, Green Market
Judge Bazar Near, Taj Cinema, Mardan.
- 5- Mohammad Ikram Son of Fazal Rauf R/O
Village Takht Bhai Mohallah Afzal Imam
Gomony Takht Bhai District Mardan.
- 6- Said Qayum Son of Muhammad Karim R/O
Village & P.O, Rustam District Mardan.
- 7- Hafiz Attallah Son of Nisar Muhammad
attached to the Court of Senior Civil Judge,
Mardan.
- 8- Haseeb Ahmad Son of Abdul Jabbar R/O
Village & P.O, Mayar District Mardan.
- 9- Tariq Ahmad Son of Faziq R/O, House No.10
Mohallah Mir Afzal Khan Bazar Mardan.
- 10- Muhammad Taif Son of Rizwan Ullah
R/O Post Office, Jamal Garhi Mohallah
Bahar Tehsil and District Mardan.

ATTESTED

Contd...17

- (11)
- 11- Aslam Khan Son of Ramdad Khan R/O
Village Sada Bahar Colony Takkar Tehsil
Takht Bhai District Mardan.
 - 12- Nimatullah Son Fazal Mabood, R/O
Village Pir Garhi Police Station City
Mardan Tehsil and District Mardan.
 - 13- Sajjad Ali Son of Nehar Muhammad R/O
Canal Road Street No.3, Muslam Abad
Mardan.
 - 14- Wasal Khan Son of Daray Khan, R/O
Mohallah Shauif Abad Nowshera Road,
Royara Kadeem Mardan.
 - 15- Adnan Khan Son of Khan Farosh R/O
Haji Abad Karwan Road Mardan.
 - 16- Muhammad Ghawas Son of Said Ghawas
Naib Qasid, attached to the Court of
Civil Judge, Mardan.
 - 17- Alamgir Hayat Son of Sikandar Hayat R/O
Mohallah Rādi Gul Maricham Mardan.
 - 18- Muhammad Shafiq Son of Hayat Khan, R/O
Rigi Yousafzai Tehsil and District
Peshawar C/O Star Clinical Laboratory
Shamsi Road, Mardan.
 - 19- Muhammad Fayaz Son of Khan Wali R/O
Pir Saddo Tehsil Takht Bhai District
Mardan.

In case the above term and conditions are acceptable to you, you should report to the undersigned for assuming your duty within fortnight from today, failing which the offer shall stand withdrawn.

(Sd/-)
(DEPTD AFSAR BHAN)
District & Sessions Judge,
MARDAN.

No. 1202 / Dated Mardan the 19/07/2003.

- 1- Copy forwarded for information to the :-
- 2- Registrar Peshawar High Court, Peshawar.
- 3- District Accounts Officer, Mardan.
- Official concerned by name.

ATTESTED

Sd/-
District & Sessions Judge,
MARDAN.



Office of the
District & Sessions Judge, Mardan

Office Phone No. 0937-9230202, Fax No. 0937-9230362,
e-mail: dsimardan@yahoo.com.

Show Cause Notice

Whereas on receipt of written complaint submitted by one Mr. Muhammad Sher son of Zareen resident of Kot Shawa Adda Swabi regarding your demanding Rs.800/- for delivering copies of the file and you made him to sit till 5:00 pm on 24.06.2020;

And whereas Mr. Ijlal Hussain learned Civil Judge/Judicial Magistrate. Takht Bhai was appointed as Enquiry Officer to verify the allegations contained in the complaint and to take other steps. as deemed appropriate by him;

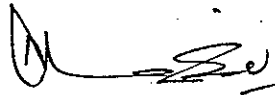
And whereas the Enquiry Officer, after taking certain steps, submitted his report (copy annexed) holding you to be guilty of demanding and receiving bribe;

Now, therefore, in exercise of powers conferred upon me under rule 7 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 and in view of your duly established guilt (in a fact finding enquiry) of demanding and taking bribe from the above named complainant, I, Mr. Kalim Arshad Khan, District & Sessions Judge, Mardan/Authority, dispense with the enquiry under Rule 5 of the above Rules and issue this final show cause notice to you Mr. Khalid, Junior Clerk (under suspension) ex-Moharrir to the court of learned Civil Judge-XII/Judicial Magistrate/Rent Controller, Mardan, as to why you should not be removed from service.

You are directed to submit your reply within 7 days of receipt of this notice failing which it will be presumed that you have nothing to reply and in that case exparte action shall be taken against you.

You may also intimate whether you wish to avail the opportunity of personal hearing.

Encl: copy of the referred complaint


Kalim Arshad Khan
District & Sessions Judge,
Mardan/Competent Authority

29.06.2020

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15 DEC 2020

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Session Court Mardan

To

THE DISTRICT & SESSIONS JUDGE MARDAN

Subject: Show Cause Notice Dated 29.06.2020

Sir,

Reference the captioned Show cause Notice received on 29.06.2020 .

It is submitted that no doubt this defense reply was due on 05.07.2020 But, I had applied for extention of time on grounds of pendency of a constitutional Petition hence, this defense a reply is being submitted today, after the disposal of the writ petition.

Besides the other legal objections it is submitted that the allegations of demanding and acceptance of illegal amount from the alleged complaint, Sher Muhammad, are incorrect and false. I am quite innocent in this matter.

I had neither demanded nor accepted any such amount. Even the said Sher Muhammad had never meet me. The affidavit by Sher Muhammad denying the demand and payment of the alleged amount is attached. The whole of the story is a staged one.

On the crucial day, the Munshi/Clerk of Muslim shah Advocate came to my office and placed certain currency notes on my table, asking me to keep this amount till his return. I wanted to ask him the reason. But he hurriedly went away.

In order to know the actual situation and to return the amount to him back, I left my chair to go out. But, by that time the raiding party intercepted me, and Muslim Shah Advocate started making video with his mobile.

I am quite innocent in the matter, it is a preplanned staged drama against me, based on some malice.

I reserve the right of proper hearing /defense according to law.

It is requested that the case may be closed favorably and I may be exonerate.

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07/07/2020

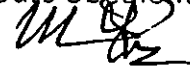
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Dated: 07.07.2020

DA - One

Yours obediently



Khalid Khan (Moharrir/J.C)
Under suspension in the
Court of CJ-XII Mardan.

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15 July 2020

Examiner Copying Branch
Session Court Mardan

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CPD 99
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Regd A/D

To

The Registrar,
High Court, Peshawar.

Through proper channel.

Subject:- Representation against the order Of The District & Sessions Judge Mardan against the order 18-08-2020, imposing the penalty of removal from service.

Sir,

Reference the captioned order, whereby I am awarded with the penalty of removal from service, on disciplinary grounds. Copy attached.

It is submitted that the impugned order is illegal, void, against the facts, the relevant law and against the principles of natural justice. The same is liable to be set-aside and I am entitled to re-instatement into service, on the following amongst many other grounds:-

1. That I am innocent & falsely implicated in the matter.

ATTESTED

2. That I had never demanded nor accepted the alleged illegal amount.

3. That the issuance of show cause Notice, in the circumstances of the matter, especially, in the light of denial of the so-called complainant that neither I had demanded the alleged amount from him nor he paid the same to me and further, that he had never lodged the complaint.

4. That in the light of the stated circumstance, the matter needed detailed enquiry and the Authority was supposed to have issued the charge sheet and to hold detailed enquiry.

5. That as per my defence reply, the munshi/clerk of Mr Muslim Shah entered the office he placed certain currency notes on the table & immediately left the office, saying that I am just coming back. I left my chair immediately and tried to follow him in order to know, his purpose. But, the mean-while,

ATTESTED

Syed Iqbal Hussain Rizvi
the civil Judge ~~XII~~ Mardan
~~Taluk Bhai Mardan,~~
accompanied by Mr Muslim Shah
advocate entered the office and
started my search. While, Mr
Muslim Shah Advocate resumed
recording video with his mobile.

6. That I appraised the raiding officer/The Civil Judge that the amount/the currency notes were placed on my table by Mr Mushtaq, the clerk of Muslim Shah Advocate, with-out any justification and that I was going after him in-order to know the reason & to return the amount to him.

7. That it is kept out of consideration that none had contacted me before the arrival of Mr Mushtaq/the Clerk of Mr Muslim Shah Advocate, nor I had demanded the illegal amount from any body.

8. That the most material points are not taken into consideration that the alleged ~~and~~ complianant namely Muhammad Sher, had categorically denied the demand of illegal money from him and

ATTESTED

also the lodging of the alleged complaint. He, Mr Muhammad Sher appeared before the District & Sessions Judge Mardan personally and appraised him about the facts that neither, I, the Appellant demanded the amount from him nor he had lodged the alleged complaint. He also tendered the written affidavit to the District & Session Judge, Mardan on 30-06-2020 to the said ~~effecte~~. But, the affidavit/Stamp paper was not accepted & even returned to him in original.

The copies of the said affidavit along-with photo copy of his C.Nic are attached.

9. That the conduct of Mr Muslim Shah Advocate, i.e, recording of video & deputing his Clerk/Munshi for placing the amount on the table of the office, shows the malice on his part that he had staged the whole drama on account of some ill-well or malice ~~ill well~~ on his part. Because, prior there-to he had demanded the photo copy of complete challan, which, I had

ATTESTED

refused, being not allowed under the rules/ practice.

10. That the Honourable District & Sessions Judge Mardan has introduced certain facts, pertaining to my service record, which were not mentioned in the show cause Notice. Thus, I was not afforded opportunity to defend the said charges.

11. That with reference to the previous punishment of "reduction to lower stage, the same belonged to the year-2008 and the same had been set-aside by The High Court Peshawar in Deptl; Appeal No.9/2008 decided on 22-03-2010. Copy attached.

12. That the other ACRs, referred to in the impugned order, were never communicated to me. Hence, the same have no adverse effect on my service records.

13. That I am condemned unheard by not conducting the detailed enquiry i.e, the issuance of show cause Notice and

ATTESTED

introducing the facts, which were not mentioned in the show cause Notice, are against the rules and also against the principles of natural justies.

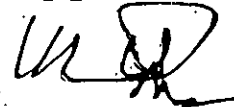
14. That I have seventeen years standing service records on my credit.

15. That the liveli-hood & education of my five School going Children are on stake, being jobless.

It is prayed that on acceptance of this Appeal, the impugned order may be set-aside and I may be re-instated into service with continued service benefits.

Dated: -24-08-2020.

Appellant



(Khalid Khan)
Ex-Moharrir
Civil Courts,
Mardan.

Address:- Village Dobcha Koroona
Tehsil & District
Charsadda.

ATTESTED

Annuce
cc E

21

IN THE COURT OF KALIM ARSHAD KHAN,
DISTRICT & SESSIONS JUDGE, MARDAN.

Disciplinary proceedings against Khalid Khan, Junior Clerk.

Order-----10
18th August, 2020.

1. Accused official Mr. Khalid Khan present.
2. One Muhammad Sher son of Zareen resident of Aman Kot, Shawa Adda, Swabi (CNIC No.16202-0966715-3 cell No.0345-2328980) had submitted a complaint in writing against the accused official named above, with the prayer of taking action against the accused official Khalid Khan, Junior Clerk, then Moharrir attached to the court of Mr. Zia Jehangir, learned Civil Judge/Judicial Magistrate/Rent Controller, Mardan. The complaint is on the allegations that the son of the complainant was behind the bars in case FIR No.1024 dated 10.05.2020 under section 381-A of the PPC; that the accused official was making unjustified demand of Rs.800/-, who had made the complainant sit till 5 pm and then asked the complainant to pay Rs.800/- for handing over the copies of the file; that the complainant was a poor person and resident of Swabi and prayed for action against the accused official.
3. On receipt of the complaint, Mr. Ijalal Hussain, learned Civil Judge/Judicial Magistrate, Takht Bhai, District Mardan was directed to accompany the complainant and make recovery, if any,


District & Sessions Judge,
Mardan.

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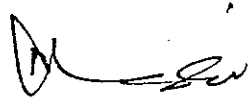
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Session Court Mardan

and to take other steps as deemed appropriate by him in order to verify the veracity of the complaint and to submit report.

4. On 27.06.2020 Mr. Ijlal Hussain, learned Civil Judge/Judicial Magistrate, Takht Bhai submitted his report. According to the report, he paid a surprise visit to the office of the accused official; that for the purpose he planned a raid to recover the bribe money allegedly demanded by the accused official named Khalid Moharrir to the court of Mr. Zia Jhangir, learned Civil Judge-XII, Mardan; that he contacted the complainant immediately and prepared list of the currency notes one of Rs.500/- No.GR5131767, 4 of Rs.100/- bearing Nos.QC1449166, MK1794118, NZ0195088, RI.062130 and two of Rs.50/- bearing No.JU5127201 & FN2791353, total worth Rs.1000/-; that after preparing the list, he signed that with a note sheet and placed that on the file as Annexure-A and proceeded to the spot; that at 11:30 O'clock, he along with complainant, Muhammad Sher son of Zareen, went towards the spot/Moharrir's room and on the way he met with Mr. Muslim Shah Aryani, Advocate, a practicing lawyer and member of the District Bar Association Mardan and requested him to go along him and if possible he might capture visuals of the event as well as the recovery so made; that on his consent, they reached the premises where the complainant was asked to enter the room and make payment of the demanded amount; that after exit of the complainant and payment of the planted currency, duly initialed by


12.06.2020

District & Sessions Judge,
Mardan.

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21

15 DEC 2020

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period of ninety days from 27.06.2020 or until conclusion of the departmental proceedings, whichever, event occurred earlier.

- 6. The office was directed to issue suspension order of the above official and direct him to immediately report to the office of the Superintendent of this court. To come up for further proceedings on 29.06.2020.
- 7. On 29.06.2020, while dispensing with the enquiry under Rule 5 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, a show cause notice was issued to the accused official with the direction to him to submit reply within seven days and the matter was fixed for 06.07.2020 for further proceedings. On which date the accused official submitted an application for adjournment on the pretext that he had filed a writ Petition No.3013-P/2020 on 01.07.2020 before the honourable Peshawar High Court, which was also fixed for 06.07.2020. The matter was thus adjourned to 07.07.2020.
- 8. On 07.07.2020, the accused official submitted his reply wherein he denied the allegations made in the complaint and the show cause notice by contending that he was innocent; that he had neither demanded nor accepted any such amount. He also produced an affidavit showing to have been sworn in by the complainant in his favour. He further stated that on the eventful day the munshi of Muslim Shah Advocate went to his office and placed certain currency notes on his table asking him to keep those till his return;

18/08/2020

District & Sessions Judge,
Mardan.

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that he wanted to ask him the reason but he hurriedly went away; that in order to know the actual situation and to return the amount back to him, he left his chair to go out but by that time the raiding party intercepted him and Muslim Shah advocate, started making his video.

9. The matter was adjourned to 20.07.2020 for personal hearing of the accused official. On 20.07.2020, the matter was posted to 30.07.2020 to wait for the decision of the honourable Peshawar High Court in the writ petition filed by the accused official against the departmental proceedings, which petition, according to the accused official, had been disposed of.

10. On 30.07.2020 the decision of the honourable Peshawar High Court passed in Writ Petition no.3013/2020 titled " Khalid Khan versus the District & Sessions Judge, Mardan" was officially communicated vide letter No.23767/157/2020WP-MN dated 20.07.2020, therefore, the matter was adjourned to 08.08.2020 for personal hearing of the accused official.

11. The honourable Peshawar High Court dismissed the writ Petition in *limine* by making following observation in paragraphs 3 and 4 of the order:

"3. In essence, the main grievances of the petitioner are that proper inquiry has not been conducted and that he has not been given opportunity of cross examination.

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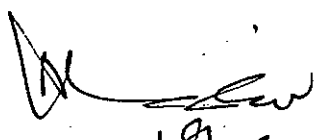
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19/08/2020
District & Sessions Judge,
Mardan.

According to the proviso of Rule 5(1)(b)(ii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority may dispense with the inquiry when satisfied that there is sufficient documentary evidence available or that there is no need to hold inquiry. The said provision of the rules *ibid* is reproduced below:

Rule---(5)(1)(b)(ii)

“Provided that the competent authority may dispense with the inquiry where it is in possession of sufficient documentary evidence against the accused or, for reason to be recorded in writing, it is satisfied that there is no need to hold an inquiry.”

4. The above said rule is very much clear with regard to dispensation of the inquiry by the competent authority and that too when the recovery of the signed notes by the Judicial Officer/inquiry officer in the company of Mr. Muslim Shah Aryani,



18/08/2020

District & Sessions Judge
Mardan.

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Session Court Mardan

advocate has been effected from the pocket put in person of the petitioner. Therefore, there is no need to conduct proper inquiry as rightly been stated in the show cause notice served upon the petitioner. Hence, we do not see any merit in this petition, which is hereby, dismissed in limine.

12. On 08.08.2020, the accused official was personally heard. He was confronted with the entire material against him, found placed on the file. He professed innocence by simultaneously prayed for taking lenient view. The matter was, however, inadvertently adjourned to 14.08.2020 for consideration with the direction to the office to provide complete service history of the accused official within two days. On 13.08.2020, a day before the date fixed, the file was put up and the Superintendent informed that 14.08.2020 was a public holiday. The office also produced the service history along with Performance Evaluation Reports of the accused official. The matter was finally adjourned for today.

13. History of service of the accused/Official

- i. The service record shows that the accused official was appointed as Junior Clerk vide Appointment Order bearing endorsement No.1202 dated 19.07.2003. He was for the first time suspended vide office order No.887-89 dated 08.04.2004.

18/08/2020


**District & Sessions Judge,
Mardan.**

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71 15 DEC 2020

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- ii. He was directed vide office order/notice No.447 dated 08.10.2004 by the then learned Civil Judge-XII, Mardan, to improve his typing skills within a span of 40 days, failure of which was to result in necessary proceeding against him. The then worthy District & Sessions Judge, Mardan directed placement of the above order on the personal file of the accused official.
- iii. Similarly vide order dated 12.07.2005, he was warned to be careful and concentrate on his job.
- iv. Again vide Office Order bearing endorsement No.1153-57 dated 18.03.2008, despite recommendation of the authorized officer for imposing major penalty of dismissal from service, the accused official was awarded penalty of reduction to lowest stage in time scale. This order of the then worthy District & Sessions Judge, Mardan was challenged by the accused official before the honourable Peshawar High Court in Departmental Appeal No.9 of 2008. The then honourable Senior Puisne Judge of the Peshawar High Court was pleased to allow the Departmental Appeal of the accused official and warned him to be careful in future and perform his duty diligently, honestly and efficiently, otherwise, severe action of "major penalty" would be taken against him.


 18/12/2020
 District & Sessions Judge,
 Mardan.

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 Session Court Mardan

- v. In another disciplinary proceeding regarding missing of supplementary challan, the accused official was found innocent vide decision dated 19.10.2014.
- vi. Similarly another enquiry initiated against him, for not putting in court of case file before the worthy Sessions Judge for trial, on 11.07.2014 was also filed on 18.07.2014.
- vii. But in a similar enquiry of not putting in court of case file before the worthy Sessions Judge for trial, initiated on 22.12.2014, he was found guilty on 19.02.2015 and his promotion was stopped for two years.
- viii. Once again on 02.04.2015 an enquiry was initiated, owing to causing 9 months delay in submission of challan in a criminal case wherein the accused was behind the bars, however, the delinquent official was given the penalty of "censure" on 01.10.2015.
- ix. Again on 04.06.2016 an enquiry was initiated against the accused official for causing delay in submission of challan and he was warned on 18.02.2017.
- x. Just three days after the above warning, on 21.02.2017 another enquiry was initiated against the accused official for missing of order sheet in a family court case file and he was again "warned" on 29.05.2017.

14. His PIRs have also been perused. The breakup of which is given

below:

18/08/2020

District & Sessions Judge,
Mardan.

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<u>Serial No.</u>	<u>Year of PER</u>	<u>Remarks by the reporting Officer</u>	<u>Remarks by the countersigning authority</u>
1.	2003	He possesses good qualities of head and heart.	average
2.	01.01.2004 to 30.09.2004	He is irresponsible Official	-
3.	01.10.2004 to 31.12.2004	He needs full improvement in sense of responsibility because he almost remains under the effect of lethargy in respect of his job. He is otherwise obedient and polite.	Conduct is poor and irresponsible.
3.	01.01.2005 to 13.07.2005	No comments	-
4.	14.07.2005 to 31.12.2005	He is cooperative official.	I agree with reporting officer.
5.	September, 2006 to 18.12.2006	During the period he almost disturbed all the court work and record. Due to his poor performance he was transferred from this court. He is a shulker, idle, block-headed and collusive person. Remaining in service is a risk for the District	Agreed.

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18/08/2020
District & Sessions Judge,
Mardan.

6.	2007	Judiciary, Mardan. The gentleman is taking interest in his job but he is still to learn more.	
7.	2008	He is submissive but a little bit carefree. He is cooperative.	I agree
8.	25.09.2009 to 31.12.2009	An efficient official	Agreed.
9.	01.01.2010 to 31.07.2010	Remained suspended due to disciplinary proceeding	
10.	01.08.2010 to 31.12.2010	The official is well disciplined. Highly cooperative, always disposes of his work timely and tries to come up to the expectations of his officers.	He should guard his reputation and integrity.
11.	2011	He should guard his reputation. He remained suspended on account of disciplinary proceeding.	
12.	01.05.2012 to 31.12.2012	Khalid Khan is a careless man and is not in the habit of keeping files in proper condition. Needs a lot of	Work hard and hard to be good official.

[Signature]
18/08/2020

District & Sessions Judge,
Mardan.

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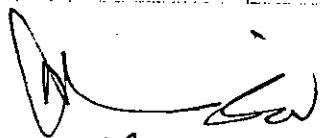
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		improvement in terms of maintenance of record. His overall performance is satisfactory.	
13.	01.01.2013 to 30.09.2013	Punctual and dutiful.	No comments.
14.	01.10.2013 to 31.12.2013	He is a good staff.	No comments.
15.	2014	Trying to cope with the situation and service. Submissive staff.	Agreed as reported.
16.	2015	Mr. Khalid Khan was quite reasonable during his service period. His performance was satisfactory.	Agreed as reported.
17.	2016	Good official. Performed satisfactorily during the period under report.	
18.	2017	Nothing special	
19.	2018	He has improved a lot in performance. He is honest, upright, devoted employee. Most importantly his positivity reflects from his improvements which he made	Agreed.

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18/08/2020

District & Sessions Judge,
Mardan.

		during period under report. An optimistic employce.	
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The report of 2019 is still awaited. It is observed that the accused official has a foul-smelling service career. He has not challenged majority of the adverse remarks and there is no result, on the file, of the few challenged by him.

15. It is true that in view of the settled legal position, the object of a Government servant and communication of the adverse remarks is to afford an opportunity to the concerned official to make amends to his remiss; to reform himself; to mend his conduct and to be disciplined, to do hardwork, to bring home his lapse in his integrity and character so that he corrects himself and improves the efficiency in public service. The defects and deficiencies brought home to the official, are means to the end of correcting himself and to show improvement towards excellence.

16. Evaluating the entire service record in the above perspective, the accused official does not seem to have mend his ways despite warnings, censures and communication of adverse remarks in more than one PIRs etc. He did not reform himself even after a very clear ruling of the honourable Peshawar High Court in Departmental Appeal No.9 of 2008, wherein he was warned to the extent that if he was not careful in future, severe action of major penalty would be taken against him and in the under lying event,



18/08/2020

**District & Sessions Judge,
Mardan.**

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he was caught red handed by a learned Judicial Officer, whose report is quite clear, detailed and speaking. The delinquent official afforded opportunity of personal hearing but he could not rebut the overwhelming material found placed on the file nor could he prove himself innocent or that he was not involved in the issue under discussion in any manner rather he had been requesting for taking lenient view. His request could not be considered because of his blemished record and the severity of the present incident of demanding bribe from a poor old person and making him wait till 5 pm just for illegal personal gains. He does not, therefore, deserve any leniency in any manner.


17. In view of the overall assessment of the entire service record of the accused official and particularly sensitivity of the instant polluted incident adversely affecting the working environment and earning bad name to the department coupled with my subjective satisfaction, it appears that accused/official is guilty of misconduct and deserves penalty so suggested to him as mentioned in the final show cause notice issued to him. Therefore, while exercising the powers under rule 4 (b) (iii) of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, I being competent authority award major penalty of "removal from service" to accused/official Khalid Khan Junior Clerk with immediate effect.

18/08/2020
District & Sessions Judge,
Mardan.

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18. Office is directed to send the copy this order to Nazir concerned for compliance and placing it on personal file of accused/official. Office shall also issue office order in the light of this order. Copy of this order be delivered to the accused/official, while one copy of it be sent to the Worthy Registrar, Peshawar High Court, Peshawar, learned Member Inspection Team, Peshawar High Court, Peshawar, for information. A copy of this order be also sent to the District Accounts Officer Mardan for compliance. It is also directed that photocopies of the currency notes recovered from the accused official be placed on the file and the original be handed over to the complainant against proper receipt. Consign.

Dated 18.08.2020.



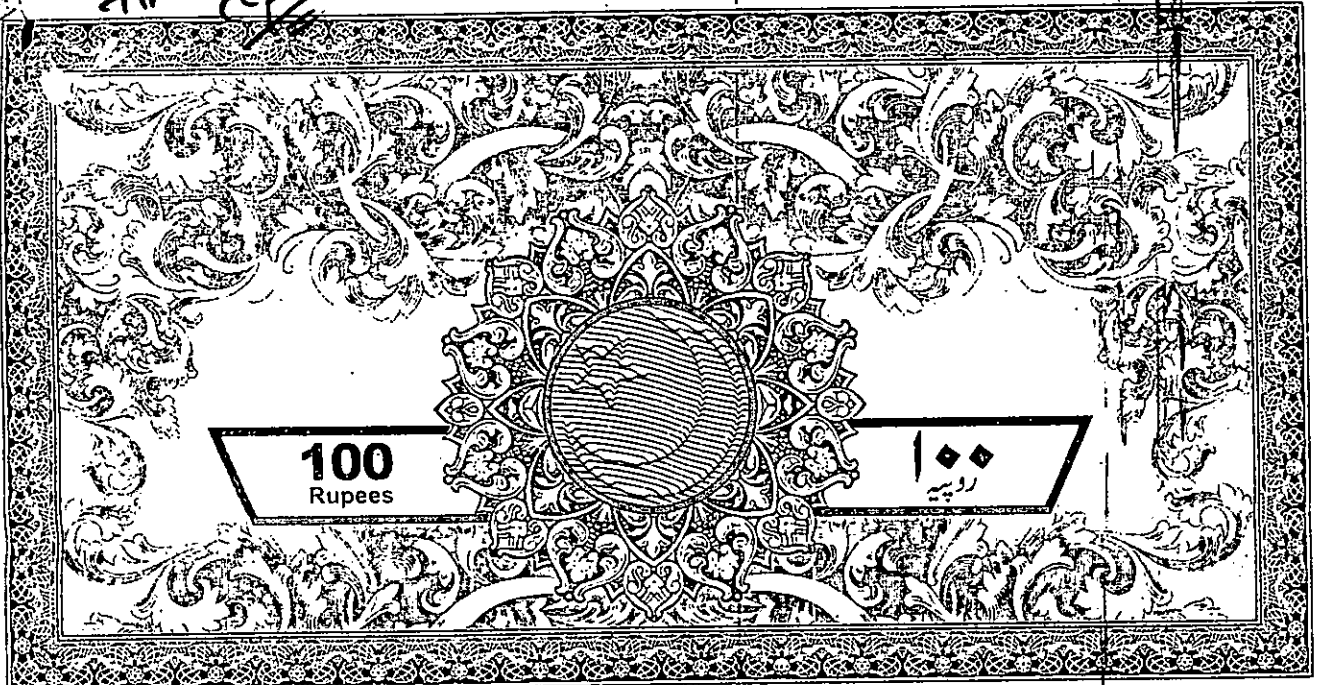
Kalim Arshad Khan,
District & Sessions Judge,
Mardan.
(Authority)

*District & Sessions Judge,
Mardan.*

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Session Court Mardan

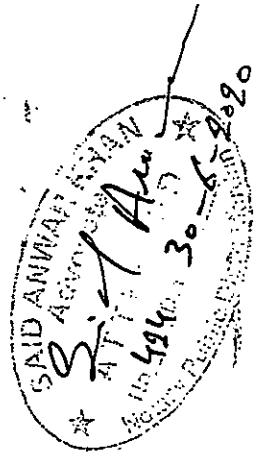


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نہایت عالی شان کے ساتھ ایک سو روپے کی رقم
حال قدر کہ ایک سو روپے کی رقم

بیان علی بابہ ہے کہ ایک سو روپے کی رقم
میزبانہ ہے کہ ایک سو روپے کی رقم

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District Council Mardan

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Mardan Treasury Mardan
10 JUL 2020
DATE OF ISSUE

قیمت 50 روپے	66235	  
ایڈوکیٹ:	لیٹا سہ	
بار کونسل ایسوسی ایشن نمبر:	BC-10-8020	<p>پشاور بار ایسوسی ایشن، خیبر پختونخواہ</p> <p>بجالات جناب: موبائی سروس سٹراٹیکسٹول KPIK کی طرف</p>
رابطہ نمبر:	0300-9020797	

منجانب: سائلین	دعویٰ:
 <p>خالد خان بنام محکمہ آب و ہوا، سندھ، سندھ</p>	علت نمبر:
	موردہ:
	جرم:
	تھانہ:
باعت تحریر آگہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام کی وکیل کے لیے محمد سعید خان ایڈوکیٹ (A) کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی لکے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: 15/12/2023

DESHAWAR BAR ASSOCIATION
KHYBER PAKHTUNKHWA

مقام: کوہ پور

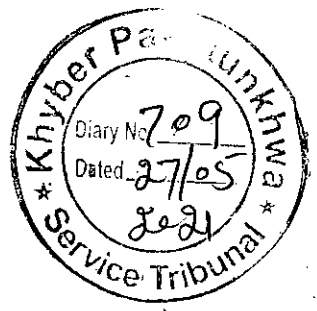
کے لیے منظور ہے۔

Accepted by

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔

خالد خان ولد قدیم خان سان دو بچہ کورون کھل و نعل چار سہ

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Put up to the worthy chair-man along with appeal

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27/5/2021

Dear Sir Early morning

Handwritten text in Urdu, possibly a salutation or opening of a letter.

Be fixed in first week of July, 2021.

Handwritten signature and date: 02/6/2021

Handwritten date: 07/07

Main body of handwritten text in Urdu, consisting of several lines of a letter or report.

27/5/21

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KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 1748 /ST Dated 03/09 / 2021


To

The District & Sessions Judge,
Government of Khyber Pakhtunkhwa,
Mardan.

SUBJECT: - JUDGMENT IN APPEAL NO. 15960/2020, MR. KHALID KHAN.

I am directed to forward herewith a certified copy of Judgement dated 07.07.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.