25.01.2017

None present on behalf of appellant, despite issuance of final notice for prosecution on last date. Today appeal was repeatedly called but no one turned up so, the instant appeal in hand is hereby dismissed for want of prosecution. File be consigned to the record room.

ANNOUNCED 25.01.2017

ASHFAQUE TA) MEMBER

Camp Court D.I.Khan

Appellant in person present and requested for

adjournment. Adjournment granted To come up for

preliminary hearing on 29.08.2016.

Member

Camp Court D.I.Khan

29.08.2016

Appellant sent an application through TCS currier for adjournment. Application placed on file. To come up for

preliminary hearing on 26.09.2016.

Member
Camp court D.I.Khan

26.09.2016

None present for appellant. Notice be issued to appellant and his counsel for preliminary hearing for 26.12.2016 before S.B at Camp Court D.I.Khan.

Camp Court D.I.Khan

26.12.2016

None present on behalf of the appellant. On last date notice was issued to the appellant and his counsel for prosecution but none is in attendance today. Final notice for prosecution of the instant appeal be issued to appellant and his counsel, otherwise case will be dealt accordingly. To come up for preliminary hearing on 23.01.2017 before S.B at Camp Court D.I.Khan.

ASHFAQUE TA)

MEMBER
Camp Court D.I.Khan

26.01.2016

Counsel for the appellant present and requested for adjournment. To come up for preliminary hearing on 23.3.16 at camp court, D.I.Khan.

MHMBER Camp court, D.I.Khan

23.2,2016

Clerk of counsel for the appellant present and requested for adjournment to produce his counsel. To come up for preliminary hearing on 29.3.16 at Camp Court D.I.Khan.

MEMBER Camp Court, D.I.Khan

28.3,2016

None for the appellant present. Notices be issued to appellant and his counsel. To come up for preliminary hearing at camp court, D.I.Khan on 24.5-16

MEMBER Camp court, D.I.Khan

Form- A FORM OF ORDER SHEET

Court of		
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Čaco No	1372/2015	

	Case No	13/2/2015
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	09.12.2015	The appeal of Mr. Abdul Kareem presented today by Mr.
		Zia-ur-Rehman Kazi Advocate may be entered in the Institution
		register and put up to the Worthy Chairman for proper order.
	·	REGISTRAR
2	1	This case is entrusted to Touring Bench D.I.Khan for
-	^	preliminary hearing to be put up thereon 29-12-15.
		CHAIRMAN
		i i
	29.12.2015	Since tour to D.I.Khan for the month of December, 20
		has been cancelled, therefore, case is adjourned
	W.	26.1.16 for the same.
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BEFORE THE HONOURABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

No of 2015

Abdel-Karnin

Versus

Govt of K.P.K etc

INDEX

S. No.	Particulars	Annexure	Page
			2
1.	Memo of Service Appeal along with memo of addresses of the parties	, -	10
			·
2.	Copy of Service Book	" A "	11
		"B"	37
3.	Copy of the Show Cause Notice		,
4.	Copies of the ex-parte inquiry proceedings and impugned dismissal Order Dated 12.08.2015	"C" & "D"	38
• .			÷.
5.	Copy of the Departmental Appeal Dated 07.09.2015	"E"	51
6.	Wakalatnama		54
•			

07 , December, 2015

Petitioner Through Counsel,

Zia-ur-Rahman Kazi /6301 8792378

Advocate High Court 3949720039

Advocate High Court Dera Ismail Khan



BEFORE THE HONORABLE SERVICE TRIBUNAL,

KHYBER PAKHTUNKHWA, PESHAWAR

Appeal no. 1372/2015

Service Appeal No of 2015

Bervice Tribunal
Diary No.1432

Abdul Karim Son of Shamsul Haq, Primary School Teacher, Resident of Kirri Shamozai, Tehsil Paroa, District Dera Ismail Khan

Petitioner

Versus

- Government of Khyber Pakhtunkhwa through Secretary Education Department, Peshawar.
- 2. **Director Elementary and Secondary Education**, Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officer (Male) Dera Ismail Khan.

SERVICE APPEAL UNDER SECTION 4

PERVERSE, TAINTED WITH MALAFIDE

4. Sub Divisional Education Officer (Male) Dera Ismail Khan.

Respondents

THE KHYBER

PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AIMED AGAINST THE IMPUGNED DISMISSAL ORDER NO 24555-61/DEO.ESTB(P) DATED 12.08.2015 PASSED BY RESPONDENT NO 3/DISTRICT EDUCATION OFFICER (M) DERA ISMAIL KHAN, BEING ILLEGAL, EX-PARTE, VOID AB INITIO, ABRITRARY,

hand sum de

PRAYER IN APPEAL

To set aside the impugned dismissal Order No 24555-61/DEO.ESTB(P) Dated 12.08.2015 passed by Respondent No 3/District Education Officer (M) Dera Ismail Khan being illegal not sustainable in the eyes of law, arbitrary, coram non judice, ex-parte, perverse, tainted with malafide and to reinstate the Petitioner in service with all back benefits.

Any other relief which this Honorable Court deems appropriate in the given circumstances of the case may please be given to the Petitioner.

Note:- Addresses given above shall suffice the object of service

Respectfully Sheweth,

- 1. **That** the Petitioner is bonafide resident of village Kirri Shamozai, Tehsil Paroa, District Dera Ismail Khan and was born on 20.08.1964.
- 2. **That** Petitioner joined the services in Education department as Primary school Teacher on 10.05.1986 in District Dera Ismail Khan. Copy of the Service Book is enclosed as **Annexure "A"**.
- 3. **That** from the date of joining service till passing the impugned dated 12.08.2015, the Petitioner performed his duties quite up to the satisfaction of his high ups. The Petitioner served the department on the post of **Primary School Teacher** for almost 29 years, thus the Petitioner has 29 years unblemished service record at his credit.

hand our den

- That the Petitioner was performing his duties in education Department as Primary School Teacher but to his extreme surprise a Show Cause Notice (SCN) No 21998/DEO (estab:

) Primary was secretly issued by the District Education Officer (M) Dera Ismail Khan on 24.06.2015 which was never served upon the Petitioner. Certain baseless allegations of willful absence from 01.02.1998 to 29.09.2004 and 18.02.2006 to 31.08.2014 (17 years, 02 months, 11 days) were leveled against the Petitioner Dated 24.06.2015. Copy of the Show Cause Notice Dated 24.06.2015 is enclosed as Annexure "B".
- 5. **That** later on, the Respondents hold an ex-parte inquiry in the matter and on the basis of said inquiry, the impugned dismissal Order Dated 12.08.2015 was passed against the Petitioner. Copies of the ex-parte inquiry proceedings and impugned dismissal Order Dated 12.08.2015 are enclosed as **Annexure "C" & "D**" respectively.
- That feeling aggrieved from the impugned Dismissal Order Dated 12.08.2015, the Petitioner preferred a within time departmental appeal before the departmental authority on 07.09.2015, which has not been responded in either way in statutory period, hence deem to be considered as rejected. Copy of the Departmental Appeal Dated 07.09.2015 is enclosed as **Annexure "E"**.
- 7. **That** feeling aggrieved from the impugned Order Dated 12.08.2015 and in action of the Departmental Authority on the Departmental Appeal of the Petitioner and having left with no other option but to re-agitate the matter through filing of present service appeal for seeking redressal of his grievances on the following amongst others grounds.

Viamo Carm Die 17.12.2015

G R O U N D S

- **a. That** the impugned dismissal Order Dated 12.08.2015 and in action of Departmental Authority on the Departmental Appeal of the Petitioner is against law, facts of the case, suffers from jurisdictional defects, tainted with malafide, and based on misconception of law on the subject, hence not legally tenable and liable to be struck down by this Honorable Tribunal in its appellate jurisdiction, rather the Petitioner has not been treated in accordance with law.
- **b. That** the entire proceeding of the Inquiry committee has been conducted in a very clandestine manner, without associating the Petitioner, hence the proceedings of the Inquiry Committee infringes the golden Principle of natural justice i.e. no one should be condemned unheard.
- c. That the enquiry committee headed by Jamal Ahmad Mirza, Chairman of the enquiry committee conducted the enquiry proceedings in a very illegal and ex-parte manner. It is a matter of record that the petitioner has been condemned unheard by the alleged enquiry committee and the golden principal of natural justice, that no one should be condemned unheard has been blatantly violated.
- **d. That** it is pertinent to mention here that the Chairman of the enquiry committee neither personally summoned the petitioner for facing the Departmental enquiry proceedings nor the petitioner has been given any opportunity of cross examining the witnesses.

mand show prices



- e. That the allegations of inefficiency, misconduct and of having ghost employee/absconder from duty are baseless and the enquiry committee has miserably been failed to substantiate the allegations against the petitioner. The petitioner is a regular employee of the Department, serving the department regularly and the imposing the harshest decision of dismissal from service and of recovery of Rs. 2082392/- is an act of arbitrariness on the part of the Departmental authority, hence liable to be undone by this Honorable Tribunal.
- f. That it was the imperative legal bounden duty of the Departmental authority and of the enquiry committee to provide an opportunity of hearing to the petitioner and also to provide an opportunity of cross examination on the statements of witnesses who allegedly recorded their statements during the enquiry proceedings, so the entire superstructure should be crumble down to the ground having no legal footings. Rather some of the witnesses spoke against the Departmental allegations during the enquiry proceeding.
- **g. That** there are plethora judgments of the superior Courts that Departmental enquiry against the civil servants should be conducted on the settled principles of law and in the case of the petitioner illegalities and irregularities are floating on the surface of record.
- h. That the petitioner never remained absent from duty rather performed its duties quite up to the satisfaction of his superior and never gave an opportunity of complaint. It is also a matter of record that during the entire service of the petitioner, no headmaster or any other superior officer complained against the petitioner.

Vien James de vors

- i. That the Department has miserably been failed to prove their allegations of inefficiency, misconduct and of remaining ghost employee/absconder from duty. It is also a matter of record that during the entire Departmental proceedings, no register of attendance was exhibited by the enquiry committee nor any attendance register was checked by the enquiry committee.
- **j. That** the enquiry report dated NIL of the enquiry committee is based on conjectures and surmises hence liable to be struck down.
- **k. That** the petitioner is a poor man and no other source of income. The financial future of the Petitioner and his entire family is at stake; hence humbly beseech to set aside the impugned dismissal order/recovery order.

It is therefore, most humbly prayed that on acceptance of instant Departmental appeal, the impugned dismissal and Order No. 24555-61/DEO.Estb(P) Dated 12/08/2015 may please be set aside and petitioner may please be reinstated in service with all back benefit.

In am Com Quies



Grant any other relief which this Honorable tribunal deems appropriate in the given circumstances of the case may please be given to the Petitioner.

4.19 3.2

Dated: 67.12.2015

Your Humble Petitioner

Abdul Karim

Appellant

Through Counsel

Cell No: 03018792378

03449720039

Zia-ur-Rahman Kazi

Advocate High Court

Dera Ismail Khan

AFFIDAVIT

I, Zia-ur-Rahman Kazi Advocate High Court, District Dera Ismail Khan, the Petitioner, do hereby solemnly affirm and declare on oath:-

- 1. **That** accompanying service appeal has been drafted by me following instructions of his client
- 2. **That** all parawise contents of the service appeal are true and correct to the best of my knowledge, belief and information;
- 3. **That** nothing has been deliberately concealed from this August Tribunal nor anything contained therein is based on exaggeration or distortion of facts.

NOTARY PUBLA

AN HIGH C

Dated:-67 .12.2015

Deponent.

ounsel for Petitioner

07/12

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No of 2015

Abdul KarimPetitioner

Versus

Government of K.P.K etc.....Respondents

SERVICE APPEAL

CERTIFICATE

Certified that this is first service appeal involving the instant subject matter and that the Petitioner has not filed any other petition earlier in this Honorable tribunal regarding the above stated controversy.



Petitioner

Through Counsel

Zia-ur-Rahman Kazi 07/15

Advocate High Court

Dera Ismail Khan

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No of 2015

Abdul Karim.....

.....Respondents Government of K.P.K etc.....

SERVICE APPEAL

List of Books refereed:

- 1. Code of Civil Procedure, 1908
- 2. The Constitution of Islamic Republic of Pakistan, 1973
- 3. The K.P.K Civil Servant Act, 1973
- 4. K.P.K Appointment, Promotion, Transfer Rules 1989
- 5. K.P.K Service Tribunal Act, 1974
- 6. K.P.K Efficiency & Discipline Rule 2011
- 7. Judicial Precedents, favouring the case of the Petitioners

Counsel for Petitioner

Note:-

Service Appeal with annexures along with three sets thereof are being presented in three separate enclosed covers.

Counsel for Petitioner

BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No of 2015

Abdul KarimPetitioner

Versus

Government of K.P.K etcRespondents

SERVICE APPEAL

MEMO OF ADDRESSES OF THE PARTIES

PETITIONER

Abdul Karim Son of Shamsul Haq, Primary School Teacher, Resident of Kirri Shamozai, Tehsil Paroa, District Dera Ismail Khan

RESPONDENTS

- 1. Government of Khyber Pakhtunkhwa through Secretary Education Department, Peshawar.
- 2. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3. District Education Officer (Male) Dera Ismail Khan.
- 4. Sub Divisional Education Officer (Male) Dera Ismail Khan.

Dated: • 7.12.2015

Your Humble Petitioner

Through Counsel

Zia-ur-Rahman Kazi

Advocate High Court

Counsel for Petitioner

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OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DERA ISMAIL KHAN

No. 21992 /DEO (Estab:) Primary.

Dated 24/6 /2015

Annexure

SHOW CAUSE NOTICE

I Muhammad Riaz Swati, District Education Officer (Male) Dera Ismail Khan as competent authority under the Khyber Pakhtunkhwa Government servants (Efficiency & discipline) rules, 2011, do hereby serve you Mr. Abdul Kareem (PST) Govt: Primary School Tehsil & District DIKhan follows:

- You had remained wilful absent/absconder w.e.f 01.02.1998 to 29.09.204 & 18.02.2006 to 31.08.2014 (17 year, 02 month, 11 days) and regularly received salary up to July 2014 and a) inflecting huge loss to the government exchequer as per findings/ report of inquiry Committee in pursuance to this office Endst No. 8327-30 dated 13/02/2015.
- There is no need of holding a formal enquiry in this case. b) -
- In exercise of the power conferred by the Khyber Pakhtunkhaw, Govt: servant (Efficiency & Discipline) rules, 2011, the Competent Authority is hereby pleased to dispense with the conduct of a formal enquiry and serve you with the instant show cause notice regarding your misconduct and guilty of corruption with the direction to submit your defense in writing within 15 (Fifteen) days of the issuance of this notice as to why the major penalty of rule 4 (b) of the said rules should not be imposed upon you and also intimate whether? you desire to be heard in person.
- In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defense to offer and ex-parte decision will be taken against you.

COMPETENT AUTHORITY

Mr. Abdul Karim (PST) Govt: Primary School DIKhan

21999-22001 /DEO(M)/Estb.(P)

Copy of the above is forwarded to:

The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.

The SDEO (M) DIKhan with the direction to serve the show cause to the concerned official and submit report regarding the amount received the accused as salary during the absent period.

3. Teacher Concerned.

District Education Qthear (W) Dera Ismail Khan

The District Edu: Cofficer (2) Dera Ismail Khan. Subject Inquiry Report against Alutal Karaem PSF. Référence Notification No. 8327-30 dt 13/02 issund from the office of DEO (11) D. I Khan Aminguity has been assigned to the undersigned. Adetailed orquiry was held and fonding of orquiry are submitted in your worthy respect. Alidul Karin Sto Mr Shamsul Hag resident of Kin Shamozai was appointed as P.T.C. He worked at CARS Kirsi Shamozai up to Feb. OR, 1998 Then he was transferred to EAMIR Maranji (Kirri Shamozai) (Sac Annoxus AG) The official did not perform his duties at Mary Narangi. He remained absent from duly 02. hat got his monthly salary regularly from the Got: (See Annixuse AR) The official was transfessed to CIPS Thoke Machori There he didnot perform his dutes. He ded not marintain the record of the school. The Enquiry Committee did not fond the promour record of the school (See Annoxuse AS) Contil.

Inquiry Committee

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The charledar, eps Those Meshori, who was appointed August the aforesaid school in 2004, stated that Abdul Karin P.T. c is as not benown to him The official (N ded not perform his duties al CIPS Mosheri (See Annexasc. 777) The officed was transferred from CIPS Meshori (Tesisel Kilachi) to CIPS Bhutaisis Shargi (DIK) by DOO (M) Primary Alkhan vide No 1225-27 dt: 29/09/04. Als The alione mentioned transfor or dor seems illoyal and invalid as the transfer of PTC from one Tobisil to ther Tehsel's beyond the powers of DD.O(m) Pry: The retatement of the Enouteidar, CIPS Mesheri, also supposts the absence of the official as the chowkidas was appointed in August 2004 and the official Thansferral from the same school on 29/9/04 and the chowleidar of the said school did not Le por the official. It morns the officeral esemand Alided Kasim pre did not perfesson his duties regularly and punctually at eight Bhutaiser skarge He often somamed alisent from duties He remained these uplo 17/02/2006 (Sec Annexuse Avand (Alv) The official was transferred from 4. PSBhulawer Shargito CAPS Bhandey Wali By EDO (SIL)

D.1. Khan vide No 6060-70 dt 01/06/2003. See Propercise AX lint his attendance at CIPS Bhutaises Sharqi is 17/02/2006. It is obvious that (2) he did not alland the school after 17/2/2006-to: The official didnot resume diodulionat EIP's Bhandey Wali According to the statements of Two chorskidas and the Head Tracher of the said school, Aldul Karim P.T.C. did not perform his duties there and remainedab-Bent from school. (See Annexuse A Youl AK) The inquiry Committee found an adjustment order of the official issued from the office of the 08. INEC.(M) DIKKAN EDO (EXSE) D.I.Khan No. 15.394-96 dated 01.10 2010. Accessing to the said order, the official was adjusted at RIMPS Faizullah Khan Kesana, Duchan Soe Annexuse 1319. The alive mentioned adjustiment excles of the official proval Bogus and FARE. Amount The official did not perform trisduties at CAMOS FAIZULLah lehan Korowa, Romained absent from school (See Annexuse Beard BD) The official district appear before the inquiry Committee for bersone C. hearing. The call better fee personal hearing was sent to the official

Through Mr: Hedayatallak SPET, esses Kirri Shamogai Findings Abidul Kasim PST did not porform he dution at CIPS Naranje and CIPS Theke Mesheri and remained a lesent from schools from Formary 1995 to 29/09/2004 16 Seven yours and eight months (07 years and 08 months) but get his monthly salary regularly from the Cort. (ii) The official remained alisant from his duta from 18/02/2006 to 31/08/2014 and got monthly salary regularly from the Gort. The total period of alisonee of the officed is Seventeen years, Two months and Eleven years Months Days

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از ارس سے معمد اللہ معم P.S. 7 می گور فسنے ملب 30 4 = 1542 = rept on 6/16 / July من منت سكول نا راجي من دو يويي سراي م دی ہے۔ جو کہ اس کا را گار دی ہی ہو جو درج د مسرا الر عمر الس ایٹ مراکعی ایس سے ہورے انٹے آگ سے کی میں کی میاں میں 7.7 2 6 10 set 10 10 cis 10 67.7

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-10 le-co ن س مى عدد در ولرعد و ريسانة وكيرار كورنسك برايم ن مول وكسورك يان ديا تول كر ميدالكرم ٢٠٥٠ يخرز هوك مشور ل كول من اي ديول سرائی م در ہے اور فحرک مشورل مول میں ایک ایجے اس در کا وزول کیے مع فحرک منتی را ک عا) ہوگ ای کے لیے کرے جس ۔ عن سى المراهم ولا بنواز من جو الميدار بيرا دا ماك جوك متر راي بيان ديما شوك. كرس مزات بيدا مربم داستدك في كرديك ل-ان ومت میں عبور ملی کا ورساری کی ورساری کی سائل ہے نے مرا ال مول فورسٹورل میں ای دیورال سرائی جل 12104-8850528-1= 73566/50 12102-1224404-7= 2121/2012 مثان الكولام سنراكم GPS Jhoke Mashord Tehsil Kulachi P Amas D 0346-6673090



Annexue Dy (50) OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) DERA ISMAIL KHAN

ORDER

WHEREAS you Mr. Abdul Kareem, (PST) Government Primary School of Tehsil & District DIKhan were proceeded for having committed the following gross irregularities which constitute inefficiency, misconduct and remained ghost employee / absconder from duty/wilful absent under rule 3 sub rules (a), (b) & (d) of the Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) rules, 2011.

AND WHEREAS you remained absent from duty w.e.f 01.02.1998 to 29.09.2004 & 18.02.2006 to 31.08.2014 (17 year 02 Month, 11 days) without any application/prior permission of the Competent Authority as per report of Sub Divisional Education Officer (Male) Dera Ismail Khan Vide his Letter No.598 dated 22.05 2014 and findings of inquiry committee in pursuance of this office Endstt: No. 8327-30 dated 13.02.2015.

AND WHEREAS you being ghost employee without any posting station illegally drawn nearly Rs.2082392/- in connection with salary without performing any type of duties for the period of (01.02.2006 to 31.07.2014) as per report of Sub Divisional Education Officer (M) Dera Ismail Khan Vide his letter No.980 dated 08/07/2015.

AND WHEREAS a show cause notice was served upon you vide District Education officer (M) No. 21998 dated 24.06.2015 through Sub Divisional Education Officer (M) Dera Ismail Khan.

AND WHEREAS your reply submitted to this office was found unsatisfactory.

AND WHEREAS, you were summoned vide this office letter No.22624 dated 15.07.2015 for personal hearing on 28.07.2015 and during personal hearing you have failed to defend yourself for this wilful absence.

NOW THEREFORE, the Competent Authority in exercise of the Power conferred upon him under Sub Rules-4-b (iv) of Khyber Pakhtunkhwa, Government Servant (Efficiency & Discipline) Rules-2011 is pleased to impose Major Penalty of "DISMISSAL FROM SERVICE" upon Mr. Abdul Kareem, PST of Tehsil & District DIKhan being Ghost employee of E & SE Department with immediate effect.

DISTRICT EDUCATION OFFICER
(M) DERA ISMAIL KHAN

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Endst: No. 24555-61 / DEO. Estab (P) Dated DIKhan the 12 8 /2015

Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar with the request to initiate inquiry against those DDOs who unlawfully released salaries to a ghost official and inflected huge loss to the government Exchequer.

2. Director Anticorruption Khyber Pakhtunkhwa Peshawar with the request to initiate proceeding to lodge FIR against Mr. Abdul Kareem /DDOs who released salaries to the ghost employees without performing of any type of duties.

3. District Comptroller of Accounts Dera Ismail Khan

4. Sub Divisional Educational-Officer (M) DIKhan with the remarks that entry regarding Dismissal from Service should be recorded in his service book.

5. All Sub Divisional Education Officers of District DIKhan.

6. District Monitoring Officer DIKhan

7. Mr. Abdul Kareem PST

DISTRICT EDUCATION OFFICER
(M) DERA ISMAIL KHAN

To

The Director,

Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

SUBJECT:- DEPARTMENTAL APPEAL AGAINST DISMISSAL ORDER
NO. 24555-61/DEO.ESTB(P) DATED 12/08/2015 PASSED
BY DISTRICT EDUCATION OFFICER (M) DERA ISMAIL
KHAN.

REGISTERED A.D/THROUGH PROPER CHANNEL.

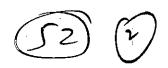
Important Note:

INSTANT DEPARTMENTAL APPEAL IS WELL WITHIN TIME.

Respected Sir,

The Petitioner humbly submits as under:-

- 1. That the petitioner was serving in Education Department under the auspicious control of District Education Officer (M) Dera Ismail Khan as Primary School Teacher. The petitioner belongs to far flange area of District Dera Ismail Khan village Kirri Shamozai and served the Department at various stations of the District.
- 2. **That** the petitioner has been proceeded against alleged allegations of inefficiency misconduct and of ghost employee / absconder from duty / willful absence from duty by the District Education Officer (M) Dera Ismail Khan.
- 3. **That** the District Education Officer (M) conducted the Departmental proceedings against the petitioner in a very clandestine manner and ordered an enquiry committee to probe into the allegations.
- 4. **That** the enquiry committee headed by Jamal Ahmad Mirza, Chairman of the committee conducted the enquiry proceedings in a very illegal and ex-parte manner. It is a matter of record that the petitioner has been condemned unheard by the alleged enquiry committee and the golden principal of natural justice,



that no one should be condemned unheard has been blatantly violated.

- 5. **That** it is pertinent to mention here that the Chairman of the enquiry committee neither personally summoned the petitioner for facing the Departmental enquiry proceedings nor the petitioner has been given any opportunity of cross examining the witnesses.
- 6. That the allegations of in efficiency misconduct and of having ghost employee / absconder from duty are baseless and the enquiry committee has miserably been failed to substantiate the allegations against the petitioner. The petitioner is a regular employee of the Department and the imposing of the harshest decision of dismissal from service and of recovery of Rs. 2082392/- is an act of arbitrariness on the part of the Departmental authority.
- 7. That it was the imperative legal bounden duty of the Departmental authority and of the enquiry committee to provide an opportunity of hearing to the petitioner and also to provide an opportunity of cross examination on the statements of witnesses who allegedly recorded their statements during the enquiry proceedings, so the entire superstructure should be crumble down to the ground having no legal footings. Rather some of the witnesses spoke against the Departmental allegations during the enquiry proceeding.
- 8. **That** there are plethora judgments of the superior Courts that Departmental enquiry against the civil servants should be conducted on the settled principles of law and in the case of the petitioner illegalities and irregularities are floating on the surface of record.
- 9. **That** the petitioner never remained absent from duty rather performed its duties quite up to the satisfaction of his superior and never gave an opportunity of complaint. It is also a matter of record that during the entire service of the petitioner, no headmaster or any other superior officer complained against the petitioner.





- 10. **That** the Department has miserably been failed to prove their allegations of inefficiency, misconduct and of remaining ghost employee / absconder from duty. It is also a matter of record that during the entire Departmental proceedings, no register of attendance was exhibited by the enquiry committee.
- 11. That the enquiry report dated NIL of the enquiry committee is based on conjectures and surmises hence liable to be struck down on these grounds and even there is no notification regarding appointment of enquiry committee.
- 12. **That** the petitioner is a poor man and no other source of income. The financial future of the Petitioner and his entire family is at stake, hence humbly beseech to set aside the impugned dismissal order / recovery order.

It is therefore, most humbly prayed that on acceptance of instant Departmental appeal, the impugned dismissal and recovery Order No. 24555-61/DEO.Estb(P) Dated 12/08/2015 may please be set aside and petitioner may please be reinstated in service with all back benefit.

Dated:04/09/2015

ABDUL KARIM

Son of Shams-Ul-Haq PST, Education Department, Dera Ismail Khan.

(Requisite documents along with impugned dismissal order & adjustment / posting order dated 23.08.2014 are annexed with Departmental representation)

BEFORE THE LEARNED SERVICE TRIBUNAL KPK PESHAWAR

WAKALAT-NAMA

Abdul Karim	***************************************	Appellant
	Versus	
Govt of K.P.K etc		Respondents
	. •	

SERVICE TRIBUNAL

I, Abdul Karim son of Shamsul Haq Ex-PST Teacher, Resident of village Kirri Shamozai Tehsil Paroa District Dera Ismail Khan do hereby appoint and constitute Mr. Zia-ur-Rahman Kazi Advocate High Court as my counsel in the subject proceedings/Service Appeal and authorize him to file, appear, act, plead etc compromise, withdraw or refer the matter for arbitration for me/us without any liability for their default and with the authority to engage/appoint any other Advocate/Counsel at our/my expense and receive all sums and amount payable to me and do all such acts which they may deem necessary for protecting my/our interest in the matter. He is also authorized to appear, file/instant Service appeal/writ petition /appeal/revision/review/application for restoration/application for contempt proceedings or application for setting aside ex-parte decree and proceedings/Miscellaneous Applications on my/our behalf.

• 7 December, 2015

Accepted

Zia-ur-Rahman Kazi Advocate

Counsel for Appellant

03018792378

0344 972 0039

Abdul Karim

Appellant Ex PST

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بخضور جناب سپیشل جج سروسز ٹربیول (K.P.K) بیثاور عنوان: <u>تاریخ سے غیر حاضری بوجہ بماری</u>-

مئودبانہ التماس ہے کہ بندہ کا جناب کے زیرسایہ یس چل رہا ہے۔ پہلے بھی بندہ
کے ساتھ محکمہ نے بہت زیادتی کی ہے۔ اس زیادتی کی وجہ سے میں عرصہ دوسال سے دل
کا مریض ہول۔ علاج کرنے کی غرض سے لا ہور آیا ہوں۔ ادھرایک اور بیاری ڈینگی
بخار میں پھنس گیا ہول۔ اور اس کی وجہ سے بندہ بہت کمزور اور شدید بیار ہے۔
بندہ کے اندرڈیرہ اساعیل خان بہنچنے کی سکت اور قوت نہ ہے۔

اللّٰدآپ کاوقار بلند کرے۔

العارض

عبدالكريم P.S.T ولدشس الحق ضلع دريره اساعيل خان

فون نمبر:4130402-0300

27-08-2016:を)に