

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

Service Appeal No. 1769/2022

Inam Ullah

Vs

Govt of Khyber Pakhtunkhwa & others

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 4397

Dated 16/3/2023

INDEX

S No	Description	Annexure	Page
1	Comment		1-4
2	Affidavit		05
3	Copy of travel history	A	6 —
4	Copy of charge sheet, statement allegation	B	7 — 11
5	Copy of application	C	12 — 17
6	Copy of response letter	D	18 — 19
7	Copy of attendance sheet	E	20.
8	Copy of enquiry	F	21 — 46

Respondent  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

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

Service Appeal No. 1769/2022

Inam Ullah

Vs

Govt of Khyber Pakhtunkhwa & others

**Written comments on behalf of Respondents**

**Preliminary Objections:**

Respectfully Sheweth:

- A. That the Appellant has no locus standi and cause of action.
- B. That the present Appeal is wrong, baseless and not maintainable, it shows no cause to be taken for adjudication, therefore, the Appeal is liable to be rejected/dismissed.
- C. That the Appeal is unjustifiable, baseless, false, frivolous and vexatious. Hence the same is liable to be dismissed with the order of special compensatory costs in favour of Respondents.
- D. That no legal right of the appellant has been violated, therefore, the appellant has no right to file the instant appeal.
- E. That the Appellant is completely estopped/precluded by his own conduct to file this Appeal.
- G. That the Appellant has not come to this Hon' able Tribunal with clean hands. The Appeal also suffers from misstatements and concealment of facts and as such the Appellant is not entitled to equitable relief.
- H. That the Appellant has no right to file the instant Appeal and the Hon' able Services Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.
- I. That the instant appeal is barred by law and limitation.

PARA WISE REPLY ON FACTS:

1. That the para needs no comments.
2. Incorrect, hence, denied because it has not been clarified that for what kind of leave, the appellant applied. Mr. Mukhtar Ahmad ADO of that time can only forward such an application to SDEO which should further forwarded that to the E.D.E.O of that time, no copy of the above-mentioned application has been received in the office of the then E.D.E.O Charsadda.

It has also been admitted by the appellant that he travelled abroad, according to the leave rules 1981, no one can proceed abroad without having sanction of Ex-Pakistan leave. The appellant had remained absent for 10 years while working in Saudi Arabia.

3. That appellant left his duty station without proper leave and permission.
4. That the application allegedly filed by the appellant on dated 01/10/2013 have no diary No. or any other reference, which can justify the stance of the appellant.

Further the application annexed with the appeal on page (11) reveals that same has no diary No. as well as any other evidence which can justify it as genuine. Moreover, the appellant served in Saudi Arabia since 10/8/2007 till 9/11/2016. The appellant alleging that he filed appeal on dated 11/08/2014 before the competent authority but the travel history of the appellant discloses that the appellant was aboard during that period. **(Copy of travel history annexed as annexure A)**

5. That the enquiry report dated 25/03/2014 reveals that the appellant remained absent since 01/9/2009 till 09 November 2016, therefore, on the report of enquiry officer the appellant was then proceeded.
6. That appellant, upon the directions rendered by the Hon `able Khyber Pakhtunkhwa Service Tribunal in Service Appeal No 606/2018, has been proceeded and an enquiry was conducted, in pursuance of the show cause notice, charge sheet, statement of allegations and on report of the enquiry the appellant had been proceeded. **(Copy of charge sheet statement allegation is attached as annexure B)**
7. That the para as stated is wrong and baseless, because the referred application reveals that it had not been filed by the appellant, rather by his son namely Naveed Anjum, the travel history of the appellant shows that the application

was filed by his son and not by the appellant. Further the application filed under R.T.I also discloses that it was filed by the appellant's son namely Naveed Anjum. *(Copy of application is attached as annexure C)*

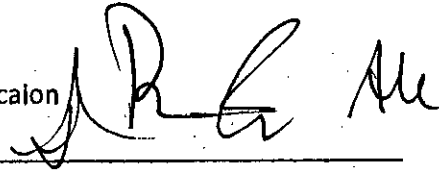
8. That the para needs no comments, however, the appellant during that specific period was abroad without proper procedure and permission.
9. That the judgment of this Hon `able court had been complied with in its true spirit and the appellant been proceeded accordingly.
10. Incorrect, that the notification dated 25/9/2021 and other relevant notifications i-e charge sheet, statement of allegations and attendance sheet shows that the appellant had been proceeded in accordance with law and procedure.
11. That the departmental appeal filed by the appellant is badly time barred.
12. That the appellant is not an aggrieved party, hence, has no right to file the instant appeal before this Hon `able Tribunal and the same is liable to be dismissed with heavy cost in favour of answering respondents interalia on the following grounds amongst others.

### **GROUND**S

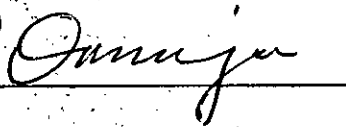
- A. & B. That the para as stated is wrong, frivolous and baseless because the appellant travelled to Saudi Arabia in the year 2007 i-e on dated 10/08/2007. Thus claiming that the appellant had filed application for leave in 2009 is against the law, because the appellant had been absent since 10/08/2007 and did not performed duty, which also proves that the leave application was filed during the stay of the appellant abroad. The appellant departmental appeal was responded with in due time. *(Copy of response latter is attached as annexure D)*
- C. That the appellant never applied for leave and flew without proper permission/leave to Saudi Arabia.
- D. Incorrect, that the appellant absenteeism had been proved in that enquiry, therefore, had been proceeded in accordance with law.
- E. That the para as stated is wrong because the appellant had been absent since 10 August 2007 till 09 November 2016 without proper permission and leave, hence, is not entitled for any kind of relief.
- F. Incorrect, that the appellant was issued a charge sheet and statement of allegations.

- G. Incorrect, hence, strongly denied the appellant had been proceeded strictly in accordance with law on the subject and in pursuance of the directions rendered by this Hon `able Tribunal.
- H. & I. Incorrect, the attendance sheet and signature of the appellant proves the association of the appellant ***(Copy of attendance sheet is attached as annexure E)***
- J. Incorrect, hence, denied the appellant had been called personally and after providing reasonable opportunity been proceeded. ***(Copy of inquiry report is attached as annexure F)***
- K. Incorrect, that the appellant had been proved as guilty of prolong absenteeism, hence, is not entitled for any kind of relief.
- L. Incorrect, the appellant absenteeism had been proved by the enquiry report and the travel history further cemented the same, therefore, is not entitled for any kind of relief.
- M. That the answering Respondents seek permission to advance other documents/grounds at the time of heaving of the appeal.

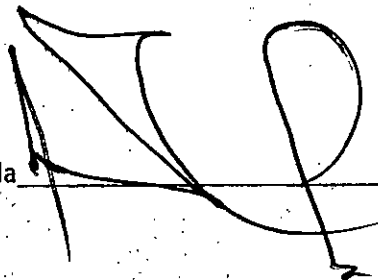
1. The Secretary Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.



2. The Director Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar.



3. The District Education Officer (Male) Charsadda



BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR

Service Appeal No. 1769/2022

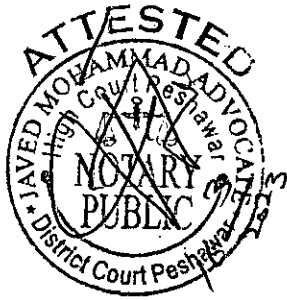
Inam Ullah

Vs

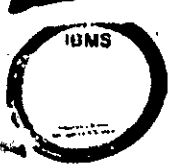
Govt of Khyber Pakhtunkhwa & others

**AFIDAVIT**

I Mr. Dr. Abdul Malik DEO (M) Charsadda do hereby solemnly affirms that the information provided by the DEO (M) and the contents of the Para-wise comments submitted by respondents are true and correct and nothing has been concealed intentionally from this Hon' able tribunal.



Deponent  
(Dr. Abdul Malik)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA



FEDERAL INVESTIGATION AGENCY  
**INTEGRATED BORDER MANAGEMENT SYSTEM**  
 FIAHQ G-9/4 PESHAWAR MOR ISLAMABAD  
 Fax No 051-9262376, Tel No 051-9107219  
**R-11 (TRAVEL HISTORY)**

*(Handwritten marks: 'A' in a circle, '6' in a circle, and a signature)*

TRAVEL HISTORY FOUND ON: 1710234472415 ✓  
 Required By District Education Officer, Charsadda ✓ Department: EDO  
 Letter Number No.11859 ✓ Request Date: 21-May-2019 ✓ Diary No 289 ✓  
 Query Date 21-May 2019 ✓

TRAVELER'S CNIC/NIC  
 1710234472415 ✓  
 PERSONAL INFORMATION:  
 NAME INAMULLAH ✓ BIRTH DATE 01-JAN-1972 ✓  
 FATHER/HUSBAND NAME HAZRAT MUHAMMAD ✓ NATIONALITY Pakistan ✓

**TRAVEL DETAILS:**

S.NO	TRAVEL DATE	FLIGHT_NO	TRAVEL STATUS	PASSPORT NO	SITENAME
✓ 1	10-Aug-07 2:58:09	MH-160-DEP	Departing	AN2742411	JINNAH INTL RNATIONAL AIRPORT
2	10-Aug-07 2:58:09	MH-160-DEP	Departing ✓	AN2742411	JINNAH INTERNATIONAL AIRPORT
3	10-Aug-07 2:58:23	MH160-DEP	departing	AN2742411	Jinnah International Airport Karachi
✓ 4	28-Jan-08 23:07:42	PK-208	Arriving ✓	AN2742411	JINNAH INTERNATIONAL AIRPORT
5	28-Jan-08 23:07:42	PK-208	Arriving	AN2742411	JINNAH INTL RNATIONAL AIRPORT
6	28-Jan-08 23:08:18	PK208	arriving	AN2742411	Jinnah International Airport Karachi
✓ 7	07-Jul-09 12:36:37	G9-554	Departing ✓	AN2742411	PESHAWAR INTL RNATIONAL AIRPORT
8	07-Jul-09 12:37:27	G9554	departing	AN2742411	Peshawar International Airport
✓ 9	23-Sep-13 2:41:14	QR346	arriving ✓	AN2742412	Peshawar International Airport
✓ 10	04-Feb-14 1:31:10	EY262	departing ✓	AN2742412	Peshawar International Airport
✓ 11	03-Aug-14 12:23:18	XY58	arriving ✓	AN2742412	Benazir Bhutto International Airport Islamabad
✓ 12	22-Oct-14 18:04:16	PK731	departing ✓	AN2742412	Jinnah International Airport Karachi
✓ 13	09-Nov-16 10:57:31	NL722	arriving ✓	AN2742412	Peshawar International Airport

*(Handwritten signature)*  
**ATTESTED**

CHECKED

Time: 11:50:22 am

Page 1 of 1

Note: Computer Generated Report Based On Given Particulars

PREPARED BY: \_\_\_\_\_

**(NOT FOR COURT USE)**

13 (7)

124

**CHARGE SHEET**

I, Umar Zaman DEO (Male) Charsadda, as competent authority, hereby charge you, Mr. Inam Ullah Ex-Chowkidar of GPS Chil Tangi Charsadda as follow:

- (a) That you have been found guilty of habitually absenting yourself from duty without prior approval of leave since September, 01, 2009.
  - (b) That your son namely Naveed Anjum performed the duties of chowkidar in your absence, as the school was adjacent to your hujra.
2. By reason of the above, you appear to be guilty of absence and misconduct under rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rule 4 of the rules ibid.
  3. You are, therefore, requested to submit your written defence within seven days of the receipt of the charge sheet to the inquiry officer.
  4. Your written defence, if any, should reach to the inquiry officer within the specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.
  5. Intimate whether you desire to be heard in person.
  6. A statement of allegations is enclosed.

25/9/2021  
(COMPETENT AUTHORITY)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSDDA

ATTESTED



(8)

131

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA

DISCIPLINARY ACTION

I, Umar Zaman DEO (Male) Charsadda as competent authority, am of the opinion that , Inam Ullah S/O hazrat Muhammad Ex-Chowkidar of GPS Chil Tangi has rendered himself liable to be proceeded against as he committed the following acts/omissions, with the meaning of rules 3 of the Khyber Pakhtunkhwa Government Servants (efficiency and Disciplinary) rules. 2011.

STATEMENT OF ALLEGATIONS

1. He has found guilty of habitually absenting himself from duty with prior approval of leave since September, 01, 2009.
2. His son namely Naveed Anjum performed the duties of chowkidar in his father's absence as the school was adjacent to the hujra of the accused.

For the purpose of inquiry against the said accused with reference to the above allegations, an inquiry officer, consisting of the following, is constituted under rule 10 (1) (a) of the Khyber Pakhtunkhwa Government Servants (efficiency and Disciplinary) rules. 2011.

1. Mr. Muhammad Hamid Principal,  
GHS Babra Charsadda.

The inquiry officer shall, in accordance with the provisions of the Khyber Pakhtunkhwa Government Servants efficiency and Disciplinary) rules. 2011 provide reasonable opportunity of hearing to the accused; record its findings and make, within thirty days of the receipt of this order, recommendations as to punishment of other appropriated action against the accused.

The accuse alongwith the well conversant representative of the Department. Wisal Muhammad SDEO (Male) Tangi Charsadda shall join the proceedings on the date, time and place fixed by the inquiry officer.

(UMAR ZAMAN)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

Endst: No. 13250-55 /dated Charsadda the 25 / 9 /2021  
Copy for information to the:-

1. PS to Secretary (E&SED) Khyber Pakhtunkhwa Peshawar.
2. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
3. Mr. Muhammad Hamid Principal GHS Babra Charsadda.
4. Mr. Wisal Muhammad SDEO (Male) Tangi Charsadda.
5. Head Master GPS Chil Tangi.
6. Mr. Inam Ullah (Ex-Chowkidar of GPS Chil Tangi), Chil Payan P/O Shodag Tehsil Tangi Charsadda.
7. Office copy.

ATTESTED

DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

9

To

The District Education Officer,  
Male Charsadda.

Subject; SHOW CAUSE NOTICE / REPLY.

Memo;

Reference to your good self letter NO. 16016-21/dated 17/11/2021 on  
the subject noted above, the show cause reply in original in r/o Mr Inam Ullah Chowkida  
GPS Chail Tangi is submitted for necessary action please.

*Inam*  
Sub Divisional Education Officer,  
(Male)Tangi.

*Ashad*  
*23/12/2021*

*[Signature]*  
**ATTESTED**

*M/o Charsadda*

Distt. Edu: Officer (Male)  
3503  
Date: 23/12/2021  
Male Charsadda

10

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

153

NO 17238 / DATED 9 / 12 / 2021

To,

Mr. Inam Ullah Chowkidar,  
GPS Chil Tangi Charsadda.

SUBJECT:- REPLY OF SHOW CAUSE NOTICE/PERSONAL HEARING  
Memo,

I am to refer to the subject cited above and to direct you to appear for personal hearing with the undersigned on 15.12.2021, 2:00 pm positively.

*[Signature]*  
DY: DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA  
*[Signature]*

Endst: No 17238-44 / dated Charsadda the 09 / 12 / 2021

Copy for information to the

1. Director E&SE Khyber Pakhtunkhwa.
2. Deputy Commissioner Charsadda.
3. DMO/EMA Charsadda.
4. SDEO (Male) Tangi Charsadda
5. Head Master GPS Chil Tangi Charsadda.
6. Office file.

*[Signature]*  
DY: DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA  
*[Signature]*

*[Signature]*  
ATTESTED

(1)

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADEA  
NO 17126-27 Dated 08/12/2021

154

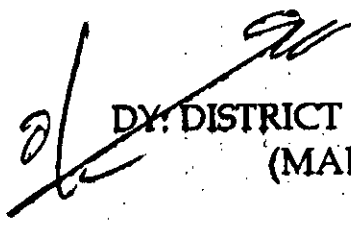
**Reminder-I**

To

1. Mr. Gul Hussain Shah,  
Chairman, Enquiry Committee,  
Principal,  
GSMSIHS No.01 Tangi Charsadda
2. Mr. Hashmat Ali,  
Member, Enquiry Committee,  
V/Principal,  
GHSS Sherpao Charsadda.

**SUBJECT:- ENQUIRY REPORT AGAINST MR. INAM ULLAH EX-CHOWKIDAR GPS CHIL TANGI CHARSADEA.**

I am directed to refer to this office letter No. 15875-76 dated 13.11.2021 on the subject cited above and to request you to submit clear-cut recommendations being court matter please.

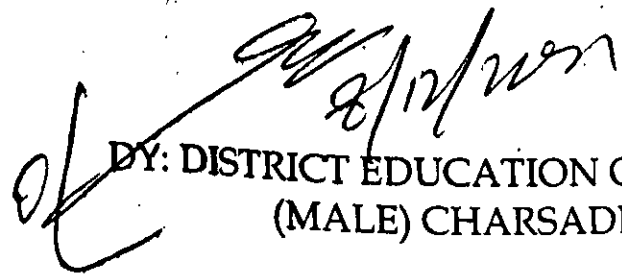
  
DY: DISTRICT EDUCATION OFFICER  
(MALE) CHARSADEA

Endst:No \_\_\_\_\_ /Dated \_\_\_\_\_ /2021

Copy for information to the:-

1. Principal GHS No.01 Tangi Charsadda.
2. Principal GHSS Sherpao Charsadda
3. SDEO (Male) Tangi Charsadda.
4. Head Master GPS Chil Tangi Charsadda
5. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda.
6. Master file.

  
**ATTESTED**

  
DY: DISTRICT EDUCATION OFFICER  
(MALE) CHARSADEA

ATTESTED

درخواست معذوریت (With pay) یعنی یہ ایک ایسا ایجنسی کا ہے جسے  
ایسا ایجنسی وقت و قیامت کے لیے اس کا اختیار ہے اور یہ ایجنسی  
میں سے ہے جسے لڑائی۔

درخواست کی منظوری میں اس ایجنسی کو اختیار ہے

مستند (Recommendation) ساری لڑائی۔

مستند کے لیے درخواست کو منظور کرنے کے لیے

درخواست کو منظور کرنے کے لیے درخواست کو منظور کرنے کے لیے

مستند کے لیے درخواست کو منظور کرنے کے لیے

مستند کے لیے درخواست کو منظور کرنے کے لیے

مستند کے لیے درخواست کو منظور کرنے کے لیے

مستند کے لیے درخواست کو منظور کرنے کے لیے

مستند کے لیے درخواست کو منظور کرنے کے لیے

مستند کے لیے درخواست کو منظور کرنے کے لیے

مستند کے لیے درخواست کو منظور کرنے کے لیے

(Statement) میں (ANNEX-C) 145

12





1949

1949





10/10/2021 ① The Response of Show Cause

(16)

In no way I was absent, took legal leave and sanctioned by the concerned department, entered in my service book.

I was satisfied, but as I got back and started my mental

the department being political

back ground, I mean the dept and a strong man, on my seat, as such

My Mr Mushraf, on my seat, as such he

strong that in this 15 years service he

has not performed a very precious duty. I have given road side, but despite

of land, near the department the worthy dept

my such sacrifice I request the worthy dept

ARRESTED

P.T.O

Agreement

(17)

to take into consideration my case  
in the light of court orders and  
reinstatement me.

Sincerely yours,

Jnam-ul-Haq  
Shokidar Chait School

Jnam-ul-Haq

ATTESTED

D . (18)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA**

**NOTIFICATION**

1. WHEREAS, Mr. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda was willful absent from duty since: - 01.09.2009.
2. AND WHEREAS, in exercise of the power conformed under section 14 of the Khyber Pakhtunkhwa Govt: Servant (efficiency and Disciplinary) rules, 2011, competent authority the then DEO (Male) Charsadda was pleased to impose the major penalty of removal from service upon Mr. Inam Ullah Ex-chowkidar GPS Chil Tangi Charsadda w.e.f 01.09.2009 vide Endst: No. 26754-68 dated 15.05.2017.
3. AND WHEREAS, Mr. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda submitted appeal before the Honourable Khyber Pakhtunkhwa Service Tribunal Peshawar vide W/P No. 606/18 dated 24.04.2018.
4. AND WHEREAS, the Honourable Khyber Pakhtunkhwa Service Tribunal Peshawar issued orders with the directions to conduct a de-novo inquiry into the matter by providing appropriate opportunity of defence to the appellant strictly in accordance with law and rules. Respondent were further directed to probe into the slackness of officers/officials who made violations and to fix responsibilities against the defaulting officers/officials.
5. AND WHEREAS, Mr. Inam Ullah Chowkidar GPS Chil Tangi Charsadda was reinstated into service for the purpose of de-novo enquiry vide Endst: No. 13239-44 dated 25.09.2021.
6. AND WHEREAS, the DEO (Male) Charsadda constituted an enquiry committee vide this office notification Endst: No. 15028-34 dated 28.10.2021.
7. AND WHEREAS, show cause notice was served upon Mr. Inam Ullah Chowkidar GPS Chil Tangi Charsadda vide Endst: No. 16016-21 dated 17.11.2021.
8. AND WHEREAS, Mr. Inam Ullah Chowkidar GPS Chil Tangi Charsadda was called for personal hearing on 15.12.2021 vide letter No. 17238 dated 09.12.2021.



  
**ATTESTED**

9. AND WHERE AS, according to the enquiry report, reply of show cause notice and personal hearing the charges against Mr. Inam Ullah Chowkidar GPS Chail Tangi Charsadda have been proved.
10. AND WHERE AS, in exercise of the power conferred under section 14 of Khyber Pakhtunkhwa Govt: servants (Efficiency & Discipline) Rules,2011. I being the competent authority DEO (Male) Charsadda is pleased to impose the major penalty of removal from service upon Mr. Inam Ullah Chowkidar GPS Chail Tangi Charsadda with effect from 01.09.2009.

(UMAR ZAMAN)  
DISTRICT EDUCATION OFFICER,  
(MALE) CHARSADDA.

Endst: No. 136-41 /Dated Charsadda the 06 / 01 /2022  
Copy forwarded for information to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Charsadda.
3. SDEO (Male) Tangi Charsadda
4. Head Master GPS Chil Tangi Charsadda
5. Official Concerned.
6. Office File.

*06/01/2022*  
DISTRICT EDUCATION OFFICER,  
(MALE) CHARSADDA.

*ATTESTED*

(E) (26)

158

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA.

ATTENDANCE SHEET DATED 15.12.2021

INAM ULLAH S/O HAZRAT MUHAMMAD CHOWKIDAR GPS CHIL TANGI

CHARSADDA

S.No	Name of Class	Father Name	Phone No.	Signature
1	Inamullah	حضرت محمد	0344875491	Inamullah

  
ATTESTED

(F) (21)

135

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA

NOTIFICATION.

Mr.Hashmat Khan V/ Principal GHSS Sherpao Charsadda is appointed as Enquiry Officer to conduct de-novo inquiry into the matter in r/o Mr. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda by providing opportunity of defense to the appellant strictly in accordance with law and rules in pursuance of the directions rendered in service appeal No. 606/2018 by the Honourable Khyber Pakhtunkhwa Service Tribunal, Peshawar. (Court Judgement is annexed).

The enquiry officer is requested to complete the enquiry within (07 days) and detail report/recommendations be submitted to this office to proceed further in to the matter.

(UMAR ZAMAN)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

Endstt: No 13968-77 / Dated 05 / 10 / 2021

Copy for information to the:

1. Principal GHSS Sherpao Charsadda.
2. Mr.Hashmat Khan V/ Principal GHSS Sherpao Charsadda
3. SDEO (Male) Tangi Charsadda.
4. Head Master GPS Chil Tangi Charsadda
5. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda.
6. Master file.

*05/10/2021*  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

*[Signature]*  
**ATTESTED**

22

131

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSAJDA**

**NOTIFICATION.**

The Competent authority is pleased to constitute a Committee comprising the following officers to conduct de-novo inquiry into the matter in r/o Mr. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda by providing opportunity of defense to the appellant strictly in accordance with law and rules in pursuance of the directions rendered in service appeal No. 606/2018 by the Honourable Khyber Pakhtunkhwa Service Tribunal, Peshawar. (Court Judgement is annexed).

The enquiry committee is requested to complete the enquiry within (05 days) and detail report/recommendations be submitted to this office to proceed further in to the matter.

01	Mr. Gul Hussain Shah	Principal, GHS No.01 Tangi Charsadda	Chairman
02	Mr. Hashmat Ali	V/Principal GHSS Sherpao Charsadda	Member

(UMAR ZAMAN)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAJDA

Endstt: No 15028-34 / Dated 28 / 10 /2021

Copy for information to the:

1. Principal GHS No.01 Tangi Charsadda.
2. Principal GHSS Sherpao Charsadda
3. SDEO (Male) Tangi Charsadda.
4. Head Master GPS Chil Tangi Charsadda
5. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda.
6. Master file.

**ATTESTED**

*[Signature]*  
 28/10/2021  
 DISTRICT EDUCATION OFFICER  
 (MALE) CHARSAJDA



(23)

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA  
NO 15875-74 Dated 13/11/2021

149

To

1. Mr. Gul Hussain Shah,  
Chairman, Enquiry Committee,  
Principal,  
GSMSIHS No.01 Tangi Charsadda
2. Mr. Hashmat Ali,  
Member, Enquiry Committee,  
V/Principal,  
GHSS Sherpao Charsadda.

SUBJECT:- ENQUIRY REPORT AGAINST MR. INAM ULLAH EX-CHOWKIDAR GPS  
CHIL TANGI CHARSADDA.

I am to refer to your enquiry report No. Nil dated 09.11.2021 on the subject cited above and to direct you to submit recommendations on probing into slackness of officers/officials who made violations as mentioned and fix responsibilities against the defaulting officers/officials immediately.

DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

Endst.No 15877-81 /Dated 1 /2021

Copy for information to the:-

1. Principal GHS No.01 Tangi Charsadda.
2. Principal GHSS Sherpao Charsadda
3. SDEO (Male) Tangi Charsadda.
4. Head Master GPS Chil Tangi Charsadda
5. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda.
6. Master file.

DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

ATTESTED

0390-500802

(24)

157

OFFICE OF THE PRINCIPAL, GOVT SHAHEED  
MIAN SHAHZAD IJAZ HIGH SCHOOL TANGI NO 01

No 3039 dated 13-12 /2021

M. Arshad  
put up on file  
14/12/2021

To

The DEO (M)  
Charsadda

SUBJECT: ENQUIR REPORT AGAINST MR. INAM ULLAH, EX-  
CHOWKIDAR GPS CHAIL, TANGI

Memo:-

In compliance of your benign office letter no 15875-76 dated 13-11-2021, the recommendations on probing into the slackness of officers/officials who made violations in the case of Mr Inam Ullah Ex chowkidar GPS Chail Tangi are forwarded for onward necessary action

In continuation with the enquiry report against Inam Ullah Ex-Chwkidar GPS Chail Tangi the following recommendations are forwarded.

RECOMMENDATIONS:-

1. The then school Head Teacher, the late Bakhtyar Shah, did not properly perform his duty to inform the office well in time and remained silent on the absence of the accused ex-chowkidar, Inam Ullah. On checking the diary/dispatch register, the school Head Teacher did not intimate the higher authorities regarding the long absence of the accused. As the diary/dispatch register does not show any entry of any letter issued on the matter under investigation except the entry which is not only doubtful (as the entry is overwritten) but also impertinent to the case under consideration. (Annex-A)

Slackness on the part of Head Teacher, the late Bakhtyar Shah, is evident from the school record.

Stamp: Edu: OMIGER (M) 3653 15/12/2021

ATTESTED

~~156~~

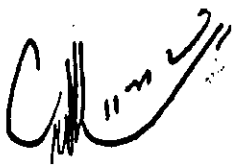
2. The then ASDEO (M) of Mandani Circle Tangi, the late Mukhtar Ahmad, verbally assured Ex-chowkidar GPS Chail, Mr Inam Ullah, for the sanctioning of his leave application, but did not bring that leave on official record, thus violating the rules. The said ASDEO (M) of Mandani Circle, neither maintained the service book of the accused nor did he make any entry in the diary/dispatch register. Hence the then ASDEO, the late Mukhtar Ahmad, in this case has been found guilty of gross professional misconduct. All this seemingly could only have happened with the connivance of the then ASDEO, the late Mukhtar Ahmad. (Annex-B).

3. There is no record of the said leave of the accused Ex-chowkidar Mr Inam Ullah GPS Chail Tangi in the SDEO (M) Tangi office.

Therefore, disciplinary action should be taken against the aforementioned Head Teacher & ASDEO under (E & D) Rules.

Based on the above recommendations appropriate disciplinary action against the aforementioned officials/officers be taken under (E & D Rules).

The above is submitted for appropriate necessary action.



(MR GUL HUSSAIN SHAH)  
 Chairman,  
 Enquiry Committee,  
 Principal  
 Govt; Shaheed Mian Shahzad Ijaz  
 High School No-1 Tangi , Charsadda



(MR HASHMAT ALI)  
 Member of Enquiry Committee  
 Vice Principal  
 GHSS; Sherpao,  
 Charsadda

~~156~~  
 ATTESTED

26

5871

**ENQUIRY REPORT AGAINST MR INAM ULLAH, EX-CHOWKIDAR GPS CHAIL, TANGI**

In compliance with District Education officer (Male) Charsadda vide Notification No 15028-30 dated 28-10-2021 a committee was constituted. The committee has been assigned a de-novo enquiry against Mr Inam Ullah, Ex-Chowkidar GPS Chail with following allegations imposed upon him.

1. That the accused Inamullah, has been found guilty of habitually absenting himself from duty without prior approval of leave from the competent authority since 01-10-2009.
2. That his son namely Naveed Anjum, performed the duties of chowkidar in his absence as the school was adjacent to his hujra.

**FINDINGS OF ENQUIRY ARE AS UNDER:**

The committee probed afresh the whole matter and tried to search for the supportive documents so that the allegations may properly be investigated. For this purpose the committee visited the concerned school, the SDEO (M) Tangi office and Mandani circle office, but no clue of any document i.e. the service book of the accused, leave application properly sanctioned by the competent authority or any other source that helps investigate the issue regarding the case under consideration has been found. Neither any of these offices did possess these papers nor did the accused manage to keep any of records with him.

However, the attendance register of the concerned school shows that the accused performed his duty as chowkidar till 30<sup>th</sup> September 2009. (Annexure-A).

From 30<sup>th</sup> September, 2009 onward the attendance of the accused is lacking and the attendance register reflects nothing about any leave to be forwarded / sanctioned by the competent authority.

The committee also handed over a questionnaire to the accused and asked him to answer the questions with his own free will. The replies in the questionnaire also show that the accused proceeded abroad in 2009 without any prior approval of leave from the competent authority (Annexure-B).

**ATTESTED**

  
9/22

(27)

*[Handwritten signature]*

The written statement provided by the accused to the inquiry committee also shows that the accused does not possess any documentary proof for the prior approval of leave since 01-10-2009 and the accused was only verbally assured for the approval of leave by the then SDEO/ADFO Mr Mukhtiar Ahmad (Now dead). No record has been found of the performance of the duty of Mr Naveed Anjum S/O Inam Ullah, the accused (Annexure-C).

Report by the Head Teacher, GPS Chail also reflects that the accused has been absenting himself from duty without adopting Through Proper Channel. The accused did not manage to get forwarded his leave application from his Head Teacher GPS Chail, Tangi (Annexure-D).

**RECOMMENDATION:**

Based on the above findings severe irregularity/deviation from rules has been found.

Therefore the case of Inam Ullah Ex-Chowkidar GPS Chail, Tangi, if deemed appropriate may kindly be processed and penalty whether minor/major be imposed upon the accused as per Rules.

The above is submitted for appropriate necessary action under the Rules.

*[Handwritten signature]*  
09-11-2011  
(MR GUL HUSSAIN SIYATI)  
Chairman,  
Inquiry Committee,  
Principal  
Govt; Shaheed Mian Shahzad Ijaz  
High School No-1 Tangi, Charsadda

*[Handwritten signature]* 9/11/11  
(MR HASHIMAT ALI)  
Member of Enquiry Committee  
Vice Principal  
GISS; Sherpao,  
Charsadda

**ATTESTED**

28

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA.  
SHOW CAUSE NOTICE.**

I, UMAR ZAMAN District Education Officer (Male) Charsadda as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) E&D rules, 2011, do hereby serve you Mr. Inam Ullah Chowkidar GPS Chil Tangi Charsadda as follows.

1. That consequent upon as per enquiry report you have been found willfully absent from duty since 01.09.2009.
- i. On going through the case it obviously proves that you are inefficient/absent from duty and liable to dealt with under E&D rules 2011. I am satisfied that you have committed the following acts/ omission Specified in E&D rules:-  
(a) Inefficiency (d) Guilty of absenting yourself from duty without prior Permission.
2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the major penalty of removal from service under rule 4 (b) of the said rules.
3. You are, thereof, 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 fifteen days of its issue, it shall be presumed that you have no defense to put in and in that case failing which an ex-parte action shall be taken against you.

COMPETENT AUTHORITY  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

Endst: No. 16016-21 / dated Charsadda the 17 / 11 / 2021

Copy forwarded to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary (E&SE) Khyber Pakhtunkhwa Peshawar.
3. SDEO (Male) Charsadda.
4. DMO/EMA Charsadda.
5. Head Master GPS Chil Tangi Charsadda.
6. Official Concerned.
7. Master File.

17/11/2021  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

No 1570 idd 23/11/2021  
copy forwarded for information  
to Inam Ullah Chowkidar GPS Chil  
for reply of show cause notice with in  
3 days

**ATTESTED**

Sub. Inam Ullah Chowkidar  
17/11/2021

29

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSAKDA.**  
**SHOW CAUSE NOTICE.**

I, UMAR ZAMAN District Education Officer (Male) Charsadda as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) E&D rules, 2011, do hereby serve you Mr. Inam Ullah Chowkidar GPS Chil Tangi Charsadda as follows.

1. That consequent upon as per enquiry report you have been found willfully absent from duty since 01.09.2009.
  - i. On going through the case it obviously proves that you are inefficient/absent from duty and liable to dealt with under E&D rules 2011. I am satisfied that you have committed the following acts/omission Specified in E&D rules:-  
(a) Inefficiency (d) Guilty of absenting yourself from duty without prior Permission.
2. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the major penalty of removal from service under rule 4 (b) of the said rules.
3. You are, thereof, 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 fifteen days of its issue, it shall be presumed that you have no defense to put in and in that case failing which an ex-parte action shall be taken against you.

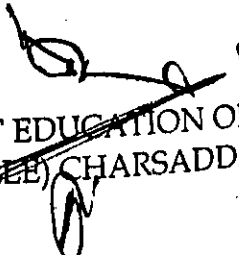
COMPETENT AUTHORITY  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAKDA

Endst: No. 16016-21 / dated Charsadda the 17 / 11 / 2021

Copy forwarded to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary (E&SE) Khyber Pakhtunkhwa Peshawar.
3. SDEO (Male) Charsadda.
4. DMO/EMA Charsadda.
5. Head Master GPS Chil Tangi Charsadda.
6. Official Concerned.
7. Master File.

ATTESTED

  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAKDA  
17/11/2021

20

**OFFICE OF THE PRINCIPAL  
GOVERNMENT HIGH SCHOOL, BABRA CHARSADEA**

No. 1585 Dated 28 / 09 / 2021

~~Handwritten mark~~

To

DISTRICT EDUCATION OFFICER (MALE)  
ELEMENTARY & SECONDARY EDUCATION  
CHARSADEA

**SUBJECT: REGRETFULNESS / REQUEST**

Memo:

Kindly refer to your esteemed office letter No: 13245-49/ Dated: 25-09-2021 it is requested to assign the task of enquiry to some other officer/principal for being already engaged in the proceeding of the sensitive enquiry of 87 Nos merged primary schools.

*DA/class w*

*Handwritten signature*  
PRINCIPAL  
Government High School  
Babra District Charsadda  
GHS BABRA CHARSADEA  
28/9/21  
HR

Dist: Edu: Officer (M)  
Duty No: 2374  
Date: 29/9/21  
Charsadda

*Handwritten signature*  
ATTESTED



(31)

UJ

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA**  
**NOTIFICATION.**

Mr. Muhammad Hamid Principal GHS Babra Charsadda is appointed as Enquiry Officer to conduct de-novo inquiry into the matter in r/o Mr. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda by providing opportunity of defense to the appellant strictly in accordance with law and rules in pursuance of the directions rendered in service appeal No. 606/2018 by the Honourable Khyber Pakhtunkhwa Service Tribunal, Peshawar. (Court Judgement is annexed).

The enquiry officer is requested to complete the enquiry within (07 days) and detail report/recommendations be submitted to this office to proceed further in to the matter.

(UMAR ZAMAN)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

Endstt: No 13245-49 / Dated 25 / 9 / 2021

Copy for information to the:

1. Principal GHS Babra Charsadda.
2. SDEO (Male) Tangi Charsadda.
3. Head Master GPS Chil Tangi Charsadda
4. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda.
5. Master file.

~~UJ~~ 25/9/2021  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

UJ

  
**ATTESTED**

Received on  
22/9/21

32

132

**OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA**  
**OFFICE ORDER**

In pursuance of the directions rendered in service appeal No. 606/2018 by the Honourable Khyber Pakhtunkhwa Service Tribunal, Peshawar Mr. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda is hereby re-instated in service for the purpose of de-novo inquiry with immediate effect.

(UMAR ZAMAN)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

Endstt: No 13239-44 / Dated 25 / 9 / 2021

Copy for information to the:

1. PA to Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. District Account Officer, Charsadda
3. SDEO (Male) Tangi Charsadda.
4. Head Master GPS Chil Tangi Charsadda
5. DMO/EMA Charsadda.
6. Official Concerned.
7. Master File.

~~25/9/2021~~  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

ATTESTED

33

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA

NOTIFICATION.

Mr. Muhammad Hamid Principal GHS Babra Charsadda is appointed as Enquiry Officer to conduct de-novo inquiry into the matter in r/o Mr. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda by providing opportunity of defense to the appellant strictly in accordance with law and rules in pursuance of the directions rendered in service appeal No. 606/2018 by the Honourable Khyber Pakhtunkhwa Service Tribunal, Peshawar. (Court Judgement is annexed).

The enquiry officer is requested to complete the enquiry within (07 days) and detail report/recommendations be submitted to this office to proceed further in to the matter.

(UMAR ZAMAN)  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

Endstt: No 13245-49 / Dated 25 / 9 / 2021

Copy for information to the:

1. Principal GHS Babra Charsadda.
2. SDEO (Male) Tangi Charsadda.
3. Head Master GPS Chil Tangi Charsadda
4. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda.
5. Master file.

25/9/2021  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

**ATTESTED**

34

AS



**GOVERNMENT OF KHYBER PAKHTUNKHWA**

OFFICE OF THE PRINCIPAL,  
GHSS DOSEHRA, CHARSADDA.

No. 65 Dated. 7-09-2021.

To

The District Education Officer(M),  
Charsadda.

Subject : **REGRET : INQUIRY ON TECHNICAL GROUNDS.**

Reference : DEO Office Notification bearing Endst.No. 9127-31 dated 04-08-2021.

Memo :

It is to state for the information of your worthy office that the undersigned has conducted a preliminary inquiry against Inamullah ,Ex Chowkidar GPS Chil Tangi , Charsadda, vide Notification bearing Endorsement No.12469-73 dated 17-12-2016. Under Rule10(3) of the KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS (EFFICIENCY & DISCIPLINE) RULES,2011, the undersigned is unable to conduct the said inquiry as this Rule candidly states that in case of conducting a formal inquiry, the inquiry officer /inquiry committee for the purpose of conducting formal inquiry shall be different from the inquiry officer/inquiry committee which conducted the preliminary inquiry.

So it is to request your worthy office to accept my regret in respect of this inquiry.  
( Copies are hereby attached with letter. )

*[Signature]*  
PRINCIPAL  
GHSS DOSEHRA  
CHARSADDA.

**ATTESTED**



*M. Arshad*  
*Propose inquiry*  
*Officers.*  
*23/9/2021*

(35)

185

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSAJDA

NO 8786 Dated 08 / 9 /2022

To,

The Director,  
(E&SE) Khyber Pakhtunkhwa,  
Peshawar.

**SUBJECT:- DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 06.01.2022 RECEIVED BY THE APPELLANT ON 15.07.2022 WHEREBY THE APPELLANT WAS REMOVED FROM SERVICE WITH EFFECT FROM 01.09.2009.**

Memo,

I am to refer to your good office letter No. 1623/F.No/A-20/C-IV/Appeal Charsadda dated 29.07.2022 on the subject cited above and to state that the detail report/comments on the following ground as under:-

1. WHEREAS, Mr. Inam Ullah Chowkidar GPS ChailTangi Charsadda was proceeded under the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on the charges of his willful absence from duty since:- 01.09.2009.
2. AND WHEREAS, Mr. Inam Ullah was sent a statement of allegations alongwith a charge sheet under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 Vide DEO (Male) Charsadda No. 12794 dated 24.12.2016.
3. AND WHEREAS, Mr. Inam Ullah Chowkidar GPS ChailTangi Charsadda failed to appeared before the enquiry officer Vide Principal Govt: Shaheed Umar Hayat Higher Secondary School Charsadda No. 239-42 dated 26.12.2016.
4. AND WHEREAS, Mr. Inam Ullah Chowkidar GPS ChailTangi Charsadda the enquiry officer found that you have been willfully absent since 01.09.2009.
5. AND WHEREAS, Mr. Inam Ullah Chowkidar GPS ChailTangi Charsadda had been called for personal hearing by the DEO (Male) Charsadda in his office on dated 04.02.2017 through letter vide No. 15719 dated 31.01.2017.
6. AND WHEREAS, Mr. Inam Ullah Chowkidar GPS ChailTangi Charsadda was finally informed through news paper on 20.03.2017 to resume duty but he could not report for duty.
7. AND WHEREAS, Mr. Inam Ullah Chowkidar GPS ChailTangi Charsadda signed the attendance sheet for personal hearing on dated 01.04.2017 but did not appear before the DEO (Male) Charsadda.

  
**ATTESTED**

36

8. AND WHERE AS, I the competent authority DEO (Male) Charsadda after having considered the charges and evidence on record of the view that the charges against Mr. Inam Ullah Chowkidar GPS ChailTangi Charsadda have been proved.
9. WHEREAS, Mr. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda was willful absent from duty since: - 01.09.2009.
10. AND WHEREAS, in exercise of the power conformed under section 14 of the Khyber Pakhtunkhwa Govt: Servant (efficiency and Disciplinary) rules, 2011, competent authority the then DEO (Male) Charsadda was pleased to impose the major penalty of removal from service upon Mr. Inam Ullah Ex-chowkidar GPS Chil Tangi Charsadda w.e.f 01.09.2009 vide Endst: No. 26754-68 dated 15.05.2017.
11. AND WHEREAS, Mr. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda submitted appeal before the Honourable Khyber Pakhtunkhwa Service Tribunal Peshawar vide W/P No. 606/18 dated 24.04.2018.
12. AND WHEREAS, the Honourable Khyber Pakhtunkhwa Service Tribunal Peshawar issued orders with the directions to conduct a de-novo inquiry into the matter by providing appropriate opportunity of defence to the appellant strictly in accordance with law and rules. Respondents were further directed to probe into the slackness of officers/officials who made violations and to fix responsibilities against the defaulting officers/officials.
13. AND WHEREAS, Mr. Inam Ullah Chowkidar GPS Chil Tangi Charsadda was reinstated into service for the purpose of de-novo enquiry vide Endst: No. 13239-44 dated 25.09.2021.
14. AND WHEREAS, the DEO (Male) Charsadda constituted an enquiry committee vide this office notification Endst: No. 15028-34 dated 28.10.2021.
15. AND WHEREAS, show cause notice was served upon Mr. Inam Ullah Chowkidar GPS Chil Tangi Charsadda vide Endst: No. 16016-21 dated 17.11.2021.
16. AND WHEREAS, Mr. Inam Ullah Chowkidar GPS Chil Tangi Charsadda was called for personal hearing on 15.12.2021 vide letter No. 17238 dated 09.12.2021.
17. AND WHERE AS, according to the enquiry report, reply of show cause notice and personal hearing the charges against Mr. Inam Ullah Chowkidar GPS Chail Tangi Charsadda have been proved.

18

*[Handwritten signature]*

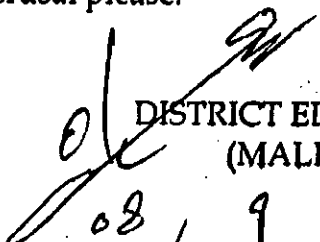
**ATTESTED**

37

18. AND WHERE AS, in exercise of the power conferred under section 14 of Khyber Pakhtunkhwa Govt: servants (Efficiency & Discipline) Rules,2011. I being the competent authority DEO (Male) Charsadda is pleased to impose the major penalty of removal from service upon **Mr. Inam Ullah Chowkidar GPS Chail Tangi Charsadda** with effect from 01.09.2009. (All relevant documents are attached).

183

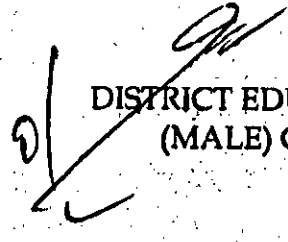
Report is submitted for your kind perusal please.

  
DISTRICT EDUCATION OFFICER  
(MALE) CHARASADDA

Endst:No 87 87-92 /Dated 08 / 9 /2022

Copy for information to the:-

1. PS to Secretary (E&SE) Khyber Pakhtunkhwa Peshawar.
2. SDEO (Male) Tangi Charsadda
3. Head Master GPS Chil Tangi Charsadda.
4. Mr. Inam Ullah Ex-Chowkidar GPS Chil Tangi Charsadda.
5. Official Concerned.
6. Master file.

  
DISTRICT EDUCATION OFFICER  
(MALE) CHARASADDA

ATTESTED

ATTESTED

Handwritten signature and text at the top left.

Handwritten text below the signature, possibly a date or reference number.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.

Handwritten text on a horizontal line.



03625962065  
3/11/2021

میرا نام محمد علی ہے  
میرا پتہ لاہور ہے  
میرا رجسٹرڈ آفس ہے  
میرا رجسٹرڈ آفس ہے  
میرا رجسٹرڈ آفس ہے

ATTESTED

03-11-2021

محمد علی صاحب  
محمد علی صاحب

محمد علی صاحب  
محمد علی صاحب

محمد علی صاحب

محمد علی صاحب

محمد علی صاحب

محمد علی صاحب

محمد علی صاحب

محمد علی صاحب

محمد علی صاحب

محمد علی صاحب

محمد علی صاحب

محمد علی صاحب

محمد علی صاحب

69

**پشاور**  
**پاکستان**

جلد 28 نمبر 20 تاریخ 20 2017ء قیمت 1438 روپے 13 نمبر 20 تاریخ 20 2017ء شمارہ 71

سہلان اوپن اپنا پیدل ہر چہرہ

الضمائم کے بعد فائیل اپنی

فائیل تعلق رکھنے والا ایجنٹ کی جانب سے

اصلاحاتی کمیٹی کو توجیہ دینے کی

پشاور ایجنٹ کی جانب سے عدالت میں

بند و میرج بل 2017ء کی منظوری

اسلام آباد این این ایس کی

سید کا کھانا  
چینی کریم  
حکومت کا  
میرٹھ کا

پشاور پاکستان

# پاکستان کے لیے



پاکستان کے لیے  
 انتخابات کے لیے  
 رجسٹرڈ ہونے کے لیے  
 درخواستیں  
 جمع کروانے کے لیے  
 تاریخ  
 09/09/2014  
 01/09/2014  
 8157

پاکستان کے لیے  
 انتخابات کے لیے  
 رجسٹرڈ ہونے کے لیے  
 درخواستیں  
 جمع کروانے کے لیے  
 تاریخ  
 09/09/2014  
 01/09/2014  
 8157

(۱۶)

TESTED

92

اللہ ہی کیلئے ہیں مشرق و مغرب القرآن

DAILY MASHRIQ PESHAWAR

# مشرق

50 سال

ABC CERTIFIED پشاور و اسلام آباد بیک وقت شائع ہونے والا کثیر الاشاعت قومی اخبار

جلد 50 پر 20 جمادی الثانی 1438ھ 2017ء 06 چیت قیمت 13 روپے

ATTESTED

## قصر کیخلاف خط کا زبردست مڑو گیند

نیب نے اسد قیصر کیخلاف کوئی ایکشن نہیں لیا تو پھر خط کسی نے لکھا، فریضی ملازمین سے

ایک ماہ کی سزا کا حکم دیا گیا ہے 2017ء تک کیخلاف ایک سزا کا حکم دیا گیا ہے

پاکستان (آئی این) ایک انصاف کے سربراہ عمران شیخ نے خط میں فریضی ملازمین سے ایک خط لکھا ہے جس میں ان کے خلاف خط کا زبردست مڑو گیند کیے گئے ہیں۔ فریضی ملازمین نے 25 سے 30 روپے کے (بقیہ 9 صفحہ 110)

### دی آوازوں کے فنڈ پر پرجتو پنچو اور نا افسران کے بیرونی دورے

پاکستان (آئی این) ایک انصاف کے سربراہ عمران شیخ نے خط میں فریضی ملازمین سے ایک خط لکھا ہے جس میں ان کے خلاف خط کا زبردست مڑو گیند کیے گئے ہیں۔ فریضی ملازمین نے 25 سے 30 روپے کے (بقیہ 9 صفحہ 110)

# ہمسایہ ایک سہارا ہے

پاکستان یراسن مسابگی کی پالیسی پر کار بند ہے، پاکستان اور روس کے درمیان تعاون کے نئے امکانات کا جائزہ لیا جائے، روس اور مسلم ریاستوں کیساتھ باہمی مفاد کی بنیاد پر آگے بڑھنا چاہتے ہیں

وزیرنگر و پیکر کو بیچنگ، پشہ کسلہ ستارا، حتمہ شہکا، دستہ کا اہلیا

پیشہ 17

۷۹

# نوٹس خیر حاضری

آپ انعام اللہ ولد حضرت محمد سکندہ جمیل ٹیگی چوکیدار گورنمنٹ پرائمری سکول جمیل ٹیگی ضلع چارسدہ آپ بغیر کسی اطلاع کے مورخہ 1-9-2014 سے ڈیوٹی سے مسلسل غیر حاضر رہے آپ کو ڈیوٹی پر حاضری کے لئے اظہار وجوہ کے نوٹس نمبر 8157 مورخہ 9-9-2014 کو آپ کے گھر کے پتہ پر بھیجے گئے جس میں آپ کو جلد از جلد ڈیوٹی کیلئے حاضر ہونے اور غیر حاضری کی وجہ بیان کرنے کو کہا گیا ہے۔ لیکن تا حال آپ کی طرف سے کوئی جواب موصول نہیں ہوا اور ابھی تک ڈیوٹی سے غیر حاضر ہے اس لئے آپ کو بذریعہ نوٹس ہذا آخری بار اطلاع دی جاتی ہیں کہ اس نوٹس کی اشاعت کے 15 دن کے اندر اندر زبردستی کے دفتر دوران اوقات کار حاضر ہو کر اپنی غیر حاضری کے معقول وجہ بیان کریں بصورت دیگر آپ کے خلاف حکومت خیبر پختونخوا E&DI رولز 2011 کے تحت حاصل کردہ اختیارات بروئے کار لاتے ہوئے یکطرفہ کارروائی کی جائیگی جو آپ کی ملازمت سے برخاستگی پر منتج ہو سکتی ہے۔



## سسران محروسہ سٹریٹ ایجوکیشن آفیسر (مزدور) چارسدہ

SAY NO TO 1294

www.khyberpakhtunkhwa.gov.pk



Q157

M/17

ATTESTED

Handwritten signature and text in Urdu, including the word "مستند" (Document).

Attested  
M. Imran Advocate  
M Imran

Handwritten text in Urdu, likely a legal statement or affidavit, mentioning a date "01/01/2013" and a reference to a court or official.

8/11/2014  
17329

Handwritten text, possibly a signature or name.

Handwritten text in Urdu, possibly a title or description of the document.

Handwritten text and signatures in Urdu, including a circled number "17" and other markings.

94

45

OFFICE OF THE  
DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA  
No. 11258 / Dated 21/1/2019

ES

To,

The Assistant Director,  
Immigration Bacha Khan Air Port,  
Peshawar.

SUBJECT: - INVESTIGATION OF IN-OUT HISTORY.  
Memo.

I have the honour to inform your good self that one Mr. Inam Ullah S/O  
Hazrat Muhammad bearing CNIC No. 17102-3447241-5 was a Class-IV in Education  
Department. He had remained absent from 2007-2017.

So, it is requested to your self to provide his abroad journey history if any to  
proceed further in the subject case as per law and rules.

DISTRICT EDUCATION OFFICER  
(MALE) CHARSADDA

ATTESTED



46

83

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) CHARSADDA.

ATTENDANCE SHEET DATED 01-04-2017

Inam Ullah S/O Hazrat Muhammad Chowkidar GPS Chail Tangi Charsadda

S.No	Name of School	Father Name	Phone No.	Signature
1	Inam ullah	Hazrat Muhammael	0344- 9457309	Inam ullah

  
**ATTESTED**