

23.11.2015

Counsel for the appellant present. Learned counsel for the appellant requested for withdrawal of appeal as the appellant has been reinstated in service.

Dismissed as withdrawn. File be consigned to the record room.

  
Chairman

ANNOUNCED  
23.11.2015

23.11.15




11/11/15

21-01-11

FORM-A  
FORM OF ORDER SHEET

Court \_\_\_\_\_

Case No. 1061/2015


	Date of order/ proceedings	Order or other proceedings with signature of Judge/ Magistrate
1	2	3
1.	01.10.2015	<p>The appeal of Mr. Abdul Khaliq resubmitted to-day by Mr. Kashif Jan, Advocate may be entered in the institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case be put up before the S.B for preliminary hearing on <u>14-10-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	14.10.2015	<p>Counsel for the appellant present. Seeks adjournment. Adjourned to 23.11.2015 for preliminary hearing before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mr. Abdul Khaliq son of Abdul Sadiq R/O Quarter No. D/7 College Colony, Saidu Sharif, District, Swat received to-day i.e. on 28.09.2015 is incomplete on the following score which is returned to his counsel for completion and resubmission within 15 days.

1. Annexures of the appeal may be attested by the appellant or his counsel.
2. One more copy of appeal alongwith annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1499 /ST,

Dated 30/9 /2015

  
REGISTRAR  
KPK SERVICE TRIBUNAL,  
PESHAWAR.

  
Mr. Kashif Jan. Advocate, Peshawar.

Resubmitted



1/10/15

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA PESHAWAR

Service Appeal No 1061 2015

Abdul Khaliq.....(Appellant)

V E R S U S


D.E.O (Male) Swat and others.....(Respondents)

I N D E X

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Appellant

Through:

  
(KASHIF JAN)  
Advocate,  
High Court, Peshawar  
Cell # 0300-9367365  
0312-9555848

Dated: -28-09-2015

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA PESHAWAR

Service Appeal No 1061 2015

E.W.F. Province  
Service Tribunal  
Diary No. 1115  
Dated 25-9-15

Abdul Khaliq KPO S/O Abdul Sadiq R/O Quarter No D-7 College Colony, Saidu Sharif District Swat.....(Appellant)

V E R S U S

1. District Education Officer (Male) Swat at Gul Kada
2. Deputy District Education Officer (Male) Swat at Gul Kada
3. Director , Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar
4. Government of Khyber Pakhtunkhwa through Chief Secretary
5. Secretary Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.....(Respondents)

Appeal under Section 4 of the Khyber Pakhtunkhwa Services Tribunal Act, 1974 against the office order No 5313-20 dated 22<sup>nd</sup> June, 2015 of the Respondent No 1, whereby the Appellant was dismissed from service and departmental appeal of the Appellant was not responded within statutory period of 90 days

PRAYER-IN-APPEAL:-

On acceptance of this appeal, the impugned order dated 22<sup>nd</sup> June, 2015 may kindly be set aside and Appellant be re-instated/restored in service with all back benefits or other remedy not specifically asked for may also be granted.

Filed to-day  
Khadim  
22/9/15

Re-submitted  
Khadim  
1/10/15

Respectfully Sheweth:-

Brief facts of the case are as under:-

- 1) That the Appellant was appointed as Junior Clerk (BPS-5) in the Respondent department vide circular No 7051 dated 30<sup>th</sup> January, 1995 in District Swat. (Copy of the order is attached as Annex 'A').
- 2) That the Appellant was later on promoted as computer operator (BPS-12) vide order No 6098 dated 02-02-2013 in District Swat. (Copy of the order is attached Annex 'B').
- 3) That on 02-06-2015, the Appellant was served by the Respondent No 1 through a show cause notice vide Endst No 2121-25 Swat, statement of allegation of charge sheet No 4116 and charge sheet No 4116, Endst No 4117-20 whereby allegation of gross misconduct and corruption has been levelled against the Appellant. (Copy of the show cause, statement of allegation and charge sheet is attached as Annex 'C' 'D' & 'E').
- 4) That on 03-06-2015, the Appellant submitted a detailed reply to the show cause notice. (Copy of the reply is attached as Annex 'F').
- 5) That the Appellant was served through the impugned dismissal order/notification vide Endst No 5313-20 dated 22<sup>nd</sup> June, 2015 by the Respondent No 1. (Copy of the order/notification dated 22-06-2015 is attached as Annex 'G').

- 6) That being aggrieved, the Appellant filed departmental appeal to the Respondent No 3 on 23-06-2015, which was not responded within 90 days. (Copy of the departmental appeal is attached as Annex 'H').
- 7) That being aggrieved, now the Appellant approaches to the Honourable Tribunal on the following grounds inter-alia:-

GROUND:-

- A) That the impugned order dated 22-06-2015 is illegal, without lawful authority, against law facts and material on record, hence liable to be set aside.
- B) That the impugned dismissal order is illegal, void ab-initio, unlawful, unconstitutional, without authority and is violative of law.
- C) That the impugned order/notification is the result of misreading and non-reading of material present on case file.
- D) That the Respondents have got no authority to dismiss the services of Appellant. Legally he can appoint civil servants from scale 1 to 10, while the Appellant is in scale 12, thus he has no authority to dismiss the Appellant from service.
- E) That the Appellant has been given copy of the inquiry report allegedly conducted on 28-5-2015, without annexure. The Appellant approaches the Respondent for the complete annexure of inquiry report, but he was denied the copies of record. It is brought within the notice

of Respondent that production of copies is not only the fundamental right of the Petitioner as is enshrined under Article 19-A of the Constitution of Islamic Republic of Pakistan, but also legal right under the Right to Access to Information Act of 2013 of the Khyber Pakhtunkhwa.

- F) That the Appellant have 20 years of unblemished service record at his back and performed untarnished duties in the office of D.E.O (Male) Swat always at a level of satisfaction of all his superior.
- G) That for the last one year the manipulated conspiracies and connivance of a few others, the Appellant have frequently been implicated in false, frivolous cases, and the Inquiry Officer Mr. Riaz Ahmad Headmaster GHS Asala is one amongst them.
- H) That the Inquiry Officer conducted inquiry against the rules in hasty manner at the back of the Appellant without confronting any document or prosecution witness to assess their veracity and to cross examined the witness. There was neither any complaint nor companionate against the Appellant to prove the false and frivolous allegations. The inquiry officer conducted the role of prosecution and did not conducted the impartial inquiry, all the inquiry proceedings have been conducted secretly on the back of the Appellant from the page 2 of the inquiry report, list of documents has been given, which shows that a single




witness has been examined by the inquiry officer. It is very much strange that how the allegation have been declared proved by the inquiry officer. It is pertinent to mention here that the inquiry officer has a personal grudge with Appellant, thus the inquiry officer conducted the whole inquiry unilaterally, illegally, without summoning and informing the Appellant without giving opportunity of cross examination to the Appellant and without giving opportunity of examination of witness against the Appellant in his presence, thus the Appellant has been condemned unheard and the golden principal of law and justice, that no one should be condemned unheard, has grossly been violated as well as the law and rules.

- I) That the inquiry officer has mala-fidely written the inquiry against the Appellant by conducting the bias and partial inquiry in single capacity, whereas all such inquiries under the control of Respondents has been conducted by 18 inquiry officers and never by individual inquiry officer specially who has a bias against the Appellant.
- J) That the Appellant has not been given opportunity of personal hearing, which is sheer violation of law and justice.
- K) That it is evident from the face of record that the whole matter is a planted, conspiracy against the Appellant.

- L) That the Appellant has not been given final show cause notice, hence the dismissal order is in violation of law and rules on the subject and is not maintainable.
- M) That the Appellant has not been given opportunity to cross-examine the complainant.
- N) That no authorized officer has been appointed, which is violation of law and rules on the subject.
- O) That no show cause has been issued by the authorized officer.
- P) That show cause, statement of allegations, charge sheet was given by the unauthorized officer by one and the same day i.e. 02-06-2015.
- Q) That the Appellant has not been given reasonable time for defence and personal hearing and his requested has been turned down by the Respondents.
- R) That the inquiry has been conducted before show cause notice, which the sheer violation of law.
- S) That the impugned dismissal order is arbitrary, unilateral and whimsical.
- T) That not a single witness has been examined regarding the allegations bribery by the inquiry officer, so how the statement of Taukal Jan can be relied upon when he has not been subject to cross-examination.
- U) That the Appellant has been made a scope goat.

- V) That no date, day and time has been mentioned regarding the alleged corruption and entry, and there is nothing incriminating against the Appellant.
- W) That explanation has been called from the Deputy D.E.O by the Respondent regarding the alleged wrong entry in the service book of Taukal Jan, but he has not been charge sheeted, thus the Respondent acted with discrimination.
- X) That some grounds may be argued at the time of arguments with the prior permission of this Honourable Tribunal.


It is, therefore, humbly prayed that on acceptance of the instant appeal, the impugned order dated 22<sup>nd</sup> June, 2015 may kindly be set aside and Appellant be reinstated/restored in service with all back benefits or other remedy not specifically asked for may also be granted.

Through: Appellant  
  
(KASHIF JAN)  
Advocate,  
High Court Peshawar

Dated: -28-09-2015

Note:-

No such like appeal for the same Appellant has earlier been filed by me, prior to the instant one.

  
Advocate

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA PESHAWAR

Abdul Khaliq.....(Appellant)

V E R S U S

D.E.O (Male) Swat and others.....(Respondents)

AFFIDAVIT

I, Abdul Khaliq KPO S/O Abdul Sadiq R/O Quarter No D-7 College Colony, Saidu Sharif District Swat, do hereby solemnly affirm and declare on Oath that all the contents of ~~Service~~ Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Honourable Tribunal.

A. Khaliq

DEPONENT

15602-0467234-7

Identified by:-



(KASHIF JAN)

Advocate,  
High Court, Peshawar

ATTESTED





BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTUNKHWA PESHAWAR

Abdul Khaliq.....(Appellant)

V E R S U S

D.E.O (Male) Swat and others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT

Abdul Khaliq KPO S/O Abdul Sadiq R/O Quarter No D-7 College Colony,  
Saidu Sharif District Swat

RESPONDENT

1. District Education Officer (Male) Swat at Gul Kada
2. Deputy District Education Officer (Male) Swat at Gul Kada
3. Director Elementary and Secondary Education, Khyber  
Pakhtunkhwa, Peshawar
4. Government of Khyber Pakhtunkhwa through Chief Secretary
5. Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa,  
Peshawar

Appellant

Through:



(KASHIF JAN)

Advocate,

High Court Peshawar

Dated: -28-09-2015

10

PHONE NO. 711916L-  
OFFICE OF THE DISTT: EDUCATION  
OFFICER (F) SECY: EDU: SWAT BUNER

APPOINTMENT ORDER:-

Consequent upon the advertisement published in the Daily News papers interview held on 05.07.1994 by the Department Selection Committee, Distt; Swat/Buner and short list drawn according to the Govt: Rules and law the appointment of Abdul Khaliq S/O Abdul Sadiq R/C Colege Colony is hereby ordered at SGHS DEO(F) Secy; Distt; Swat against Vacant J/Clerk post in the EPS NO. (5) 1, e(Rs, 1400-66-2390), plus usual allowances and fringe benefits admissible to him under the Govt: Rules from the date of his taking over charge in the interest of Public Service with the following Terms and Conditions:-

S.No.	Name, Father, Name & Address.	Post	School where posted	Remarks
1)	Abdul Khaliq S /O Abdul Sadiq R/O Colege Colony	J/C	DEO(F) Secy; Swat.	Age: J/C Post
2).				
3).				
4).				

*Attested*  
*W.M.F. to*  
*Advocate*

*Amir A*

TERMS AND CONDITIONS:-

- 1). His appointment is purely Temporary and he shall be liable to Termination at any time without assigning any reason and without any Notice from either side.
- 2). In case of resignation, He will have to give one month's prior Notice in the Department OR Forfeit one month's Salary to the Government in lieu thereof to the Govt: of N. / F. P.
- 3). All Original Documents / Certificate etc. should be checked before handing over the charge & if necessary it should be verified from the Institution / school from where issued.
- 4). His appointment is subject to the provision of Health and Age Certificate to from the civil surgeon / Medical supdt: Concerned.
- 5). This order will automatically be cancelled if they fail to submit the report for duty within 14 days of the issue of this order.
- 6). His age should not below 18 and exceed \_\_\_\_\_ years on the date of apptt;
- 7). NO TA / DA is allowed.

*[Signature]*  
Superintendent  
D.E.O Male Swat

*[Signature]*  
(MISS) S. D. BEGUM  
DISTT: EDUCATION OFFICER (F) SECY:  
EDU: SWAT BUNER & SHAHOLA.

11

Copy forwarded to the:-

- 1). The Distt;Accounts Officer/ /Sharif
- 2). The Headmistress/Headmaster Concerned.
- 3). The Cashier local office
- 4). The Candidate Concerned.
- 5). Officials Concerned.
- 6) -

*SK*

DISTRICT EDUCATION OFFICER(F) SECY:  
EDU:SWAT BUNDR & SHANGLA.

30/11/15

*h/Khalid/Q*

*Murad*

Superintendent  
D.E.O Malo Swat

*Attended  
Usaid for  
Advocate*

OFFICE OF THE DISTRICT EDUCATION OFFICER (M) SWAT AT GULKADA

(12)

OFFICE ORDER.

Consequent upon being a competent authority and delegation of Powers the following computer operator are hereby adjusted/regularize in BPS-12 in the Office of the District Education officer (M).swat with immediate effect in the best interest Of public service.

Annex B

- 01: Abdul Khaliq computer operator B-12
- 02: Said Ghani computer operator B-12.

Necessary entries to this effect should be made in their Original service Book, accordingly.

(GUL ZAMAN KHAN)  
DISTRICT EDUCATION OFFICER  
(M)SWAT AT GULKADA.

Endst:No. 6098-6102 dated the 2/2 /2013

Copy forwarded to:

- 01. The District Accounts officer swat for n/action please.
- 02. The Dy: District Education officer(M)Local office.
- 03. The official concerned.
- 04. EMIS Branch local office.
- 05. P.A to the DEO(M)local office.

*Kashif Jan Advocate*

*Gul Zaman*  
DISTRICT EDUCATION OFFICER  
(M)SWAT AT GULKADA

*Mahid*  
*Superintendent*  
S. O. Mal, Swat





OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
SWAT

13

Amir C

SHOW CAUSE NOTICE

I, Mr. Muhammad Uzair Ali District Education Officer (M) Swat, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 do hereby serve upon you, Mr. Abdul Khaliq KPO Local Office Swat this show cause notice as follow: -

1. That consequent upon the enquiry submitted by Mr. Riaz Ahmad Headmaster GHS Asala Swat to investigate the change/variation in the date of birth in the service book of Mr. Tawakal Jan Sweeper GMS Torwal Swat you have been found as follows:-
  - a. That you have demanded and received a bribe of Rs.51000/- in return for changing the Date of Birth of Mr. Tawakal Jan Sweeper GMS Torwal Swat when he submitted his retirement case.
  - b. That you have misused your official position and have indulged in corruption by demanding and receiving bribery.
  - c. That this corrupt conduct on your part is illegal, unlawful and against the government service rules and discipline which amount to gross misconduct and which is punishable by major penalty under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.
2. That as per the mentioned enquiry you have been proved to have committed the following acts/omissions specified in rule 3 (b) &(c) of the said rules: -
  - i. "Guilty of gross misconduct".
  - ii. "Guilty of corruption".
3. As a result thereof, I as the competent authority am satisfied that there is no need of further Enquiry and have thus tentatively decided to proceed against you under the above mentioned rules.
4. You are, therefore, required to show cause as to why major or minor penalty provided in the aforesaid Rules should not be imposed upon you and also intimate whether you desire to be heard in person.
5. If no reply to this effect is received within 15 days of its delivery, it shall be presumed that you have no defense to put in and in that case Ex-Parte action shall be taken against you.

(Professor Muhammad Uzair Ali)

Competent Authority  
District Education Officer (M)  
Swat

Endst. No. 2421-25 / Abdul Khaliq KPO/Disp/Swat.

Dated Swat the, 02.06.2015

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

- 1: Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 2: Deputy District Education Officer (M) Swat.
- 3: Official concerned.
- 4: PA to DEO Swat.
- 5: Office Copy.

Competent Authority / District Education Officer (M)  
Swat

02/06/15

Attested  
Wahid  
CASHI Jan  
Advocate

Mr. Abdul Khaliq KPO Local Office Swat.



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
Swat(Cell # 0946 9240209-228)

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Of Charge Sheet No. 4116 /Annexure "A"  
/Abdul Khaliq KPO/Disp/Swat. Dated: 6-2015

Statement of Allegation Against  
Mr. Abdul Khaliq KPO Local Office Swat

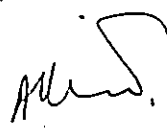
Annex D

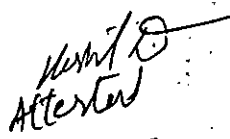
You, Mr. Abdul Khaliq KPO Local Office have been found and nominated in the enquiry investigating the change/variation in the date of birth in the Service Book of Mr. Tawakal Jan sweeper GMS Torwal Swat. You are therefore charged as follows:-

- That you have demanded and received a bribe of Rs.51000/- in return for changing the Date of Birth of Mr. Tawakal Jan Sweeper GMS Torwal Swat when he submitted his retirement case.
- That you have misused your official position and have indulged in corruption by demanding and receiving bribery.
- That this corrupt conduct on your part is illegal, unlawful and against the government service rules and discipline which amount to gross misconduct and which is punishable by major penalty under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.

  
Prof. Muhammad Uzair Ali  
(Competent Authority)  
District Education Officer Male Swat

Mr. Abdul Khaliq KPO Local Office Swat.

  
Superintendent  
D.E.O Male Swat

  
KASHI Jom  
Advocate



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)

Swat (Cell # 0946 9240209-228)

No. 4116 /Abdul Khaliq KPO/Disp/Swat. Dated: 2-6-2015

Charge Sheet

1. Whereas, you, Mr. Abdul Khaliq KPO Local Office Swat, are charged with the following charges:-
  - a. That you have demanded and received a bribe of Rs.51000/- in return for changing the Date of Birth of Mr. Tawakal Jan Sweeper GMS Torwal Swat when he submitted his retirement case.
  - b. That you have misused your official position and have indulged in corruption by demanding and receiving bribery.
  - c. That this corrupt conduct on your part is illegal, unlawful and against the government service rules and discipline, which amount to gross misconduct and which is punishable by major penalty under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011.
2. AND WHEREAS, it has been decided to show cause you under the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules, 2011.
3. Now, therefore, you, Mr. Abdul Khaliq KPO Local Office Swat, are hereby required to submit in your written defense to the Competent Authority within 15 (fifteen) days of the receipt of this charge sheet and show cause and also state whether you desire to be heard in person.
4. A statement of allegation explaining the case is also enclosed as Annex "A".

Prof. Muhammad Uzair Ali  
(Competent Authority)

District Education Officer Male Swat

Endrst.No. 4117-20 /Abdul Khaliq KPO/Disp/Swat. Dated:

Copy for Information to the:-

1. Director E&SE Peshawar.
2. DDEO Local Office.
3. PA to DEO.
4. Office copy.

District Education Officer Male Swat

*Signature*  
Superintendent  
D.E.O Male Swat

*Signature*  
Attested  
Advocate

Mr. Muhammad Uzair Ali  
District Education Officer (M) Swat

(16)

Annex F

Sub: REPLY TO SHOWCAUSE NOTICE SERVED UPON UNDERSIGNED VIDE DEO (M) SWAT ORDER ENDORSEMENT No. 2121-25/Abdul Khaliq KPO/Disp/Swat dated 02-06-2015.

Dear Sir,

The undersigned desire to submit the following vital points for your perusal and kind indulgence, prior to continuing disciplinary proceedings and to keep your good self aware of all the factual and legal position as it is the part of series of frivolous allegation/disciplinary proceedings against the undersigned on basis of personal grudges of a few.

1. That I have years of unblemished service record at my back and have performed untarnished duties in the office of the DEO (M) Swat always at a level of satisfaction of all my super ordinates.
2. That for the last one year with the manipulated conspiracies and connivance of a few others I have frequently been implicated in false and frivolous cases and Mr. Riaz Ahmad Headmaster GHS Asala is one amongst them.
3. That the inquiry officer (Mr. Riaz Ahmad Headmaster GHS Asala) conducted inquiry in a hasty manner, at my back without confronting any documents or prosecution witnesses to assess their veracity and to cross examine the witnesses. There was neither any complaint nor complainant against me, to prove the false and frivolous allegations. The inquiry officer played a role of prosecutor and did not conduct the impartial inquiry, the statements of witnesses are recorded in my absence, and the same were not confronted with. The inquiry officer didn't even bother to intimate me about the inquiry against me which clearly shows the partiality & biasness on part of the inquiry officer against me, the same is clearly indicated by his remarks about me "the king of corruption".
4. That As stated above, the inquiry officer has ascribed mala fide inquiry against the undersigned by conducting the biased & partial inquiry in single capacity whereas all such inquiries (under your kind control) have been conducted by a team of inquiry officers and never by an individual inquiry officer (as in case of the undersigned) i.e. inquiries against Mr. Haider Ali J/C (o/o the SDEO M Swat), Mr. Nadar Khan J/C (GHS Deolae, Swat), Mr. Riaz Ahmad S/C (o/o the DEO M Swat) and so on.
5. That as I have not been provided with any of the inquiry record, any complaint against me and not even heard in the case I request your good self that an inquiry committee (and not by an individual) may constituted by your good self preferably comprising upon the impartial and honest officers/Principals of righteous repute that may not be influenced by

*Wahid D*  
Attested  
Kashif Jinn  
Advocate

either of the party. The inquiry committee, so constituted, may proceed to examine the witnesses, giving a just and fair right of cross-examination to the appellant. On the report of that inquiry committee the competent authority may pass any order in accordance with law. I once again implore for a fair trial focusing two prongs, 1st impartial inquiry i.e. recording of statements of the complainant / witnesses in my presence coupled with right of cross examination and 2<sup>nd</sup> to avoid influence of Mr. Riaz Ahmad Headmaster GHS Asala who has personal grudges to the undersigned.

- 6. That the whole matter seems to be a planted conspiracy against the undersigned influenced by the inquiry officer and adduced the false statements from Mr. Tawakal Jan Sweeper GMS Torwal, Swat. The statements recorded with free will of the so called complainant and other witnesses are annexed with this reply, which shall prove my innocence and the intrigued conspiracy against me.
- 7. That the inquiry officer in his report clearly stated that Mr. Tawakal Jan Sweeper GMS Torwal, Swat willfully committed the unlawful acts but no legal action recommended against him for the only reason of persuading him to act as blamer against me. He has been declared as innocent, uneducated, helpless person having poor financial position but amazingly committing too much unlawful deeds and paying (so called) bribes amounting Rs. 51000/=.

Under the circumstances, it is therefore, most respectfully requested that the allegations leveled against me are totally incorrect and, therefore, the show cause notice / charge sheet / statement of allegations may kindly be withdrawn, so as to meet the ends of justice.

In case your honor is not persuaded with the submission made above, I wished to be heard in-person and also to produce evidence oral and documentary after receipt of material / documents, on the basis of which the charge sheet / statement of allegations have been framed and for this purpose all the enquiry record be provided and this may kindly be considered as an interim reply.

Your Most Obedient Servant

*A. Khaliq*  
 Abdul Khaliq KPO  
 O/O DEO (M) Swat.  
 3/6/2018

*Kashif*  
 Attest  
 Kashif Khan  
 Advocate



(18)

6

Amit

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (MALE)  
SWAT  
(0946 9240209-228)**

**NOTIFICATION**

1. Whereas enquiry was conducted vide this office order No. 2731-33 dated: 08.05.2015 to investigate the change of date of birth in the service book of Mr. Tawkal Jan sweeper GMS Toorwal Swat.
2. And whereas the enquiry proved the case of corruption and taking bribery amounting to Rs.51000/- against Mr. Abdul Khaliq clerk local office.
3. And whereas show cause was issued to him as per the recommendation of the enquiry vide this office order No. 1121-25/Abul Khaliq KPO/Disp/Swat dated Swat the, 02/06/2015.
4. And whereas his reply to the show cause dated 06.06.2015 was found unsatisfactory but his request for personal hearing was granted by the Competent Authority vide No. 4907 dated 12.06.2015.
5. And whereas Mr. Abdul Khaliq could not defend his case before the Personal Committee.
6. And whereas Mr. Tawkal Jan, who was summoned as per the request of Abdul Khaliq to identify the one who took bribery from him, plainly declared him (Abdul Khaliq clerk) as the one who demanded and took Rs.51000/- as bribery from him in order to effect change of date of birth in his service book and that during the course of enquiry he (Abdul Khaliq) influenced him, to take back his money in return for not identifying him as such during his personal hearing.
7. And whereas the Authority, having considered the charges, evidence on the record and recommendations of the inquiry and personal hearing of Abdul Khaliq, his contradictory statements, fabricated documents that Abdul Khaliq produced in his defense and his clear identification by Tawkal Jan during the course of personal hearing, is of the view that Mr. Abdul Khaliq clerk Local Office Swat is proven guilty of gross misconduct, corruption and misuse of official position for making money through bribery.
8. Now, therefore, in exercise of the powers conferred by the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011 under Rule 4 (b) (iv), the Competent Authority (the District Education Officer Male Swat) is pleased to award major penalty of dismissal from Government Service in respect of Mr. Abdul Khaliq KPO (clerk) Local Office Swat with immediate effect in the interest of the public service.


*Note: Necessary entries may be made in his service book and other record.*

(PROF. MUHAMMAD UZAIR ALI)  
(Competent Authority)  
DISTRICT EDUCATION OFFICER (MALE)  
SWAT GUL KADA

Encl No: 5313-20 /Abdul Khaliq KPO/Disp/Swat Dated: 22/06/2015

Copy forwarded for information to the: -

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Comptroller of Accounts Swat for stoppage of his salary.
3. Deputy DEO Male local office.
4. B&AO Local office with the direct to stop his salary through source under intimation to the undersigned.
5. Suptt Secondary local office.
6. Mr. Abdul Khaliq Ex-KPO (clerk) Local Office.
7. PA to DEO local office.
8. M/File.

  
22/6/15  
DISTRICT EDUCATION OFFICER (MALE)  
SWAT GUL KADA

*Attested*  
*Tawkal Jan*  
*Advocate*

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BEFORE THE DIRECTOR ELEMENTARY &  
SECONDARY EDUCATION AT PESHAWAR  
(APPELLATE AUTHORITY)

Abdul Khaliq K.P.O. S/o Abdul Sadiq R/o Quarter No. D-7, College  
Colony, Saidu Sharif, District Swat ... Appellant

Versus

District Education Officer (Male) Swat at Gul Kada ... Respondent

Departmental appeal against the notification  
dated 22/06/2015 Endst: No. 5313-20/Abdul  
Khaliq KPO/DISP/Swat dated 22/06/2015;  
whereby the appellant has been dismissed from  
service.

Prayer:

On acceptance of this appeal, the impugned  
notification / dismissal order may kindly be  
declared as illegal, void ab initio, by setting  
aside the same and the appellant may  
graciously be reinstated with all back benefits.

Respectfully Sheweth:

1. That the appellant was appointed as Junior Clerk in  
Education Department Swat on 01/04/1994 and later on,  
on 02/02/2013 the appellant was promoted to the post of  
Key Punch Operator (K.P.O).
2. That on 02/06/2015 the appellant was served by the  
respondent through a show cause notice vide Endst: No.  
2121-25/Swat, statement of allegation of charge sheet No.  
4116 and charge sheet No. 4116, Endst: No. 4117-20,

*Attested*  
*Kashif Jan*  
*Advocate*

whereby allegation of gross misconduct and corruption has been leveled against the appellant. (Copies are attached).

3. That on 03/06/2015, the appellant submitted a detailed reply to the show cause notice. (Reply is attached).
4. That on 23/06/2015, the appellant was served through the impugned dismissal order / notification, hence the present appeal on the following amongst other grounds inter alia. (Copy of impugned order / notification is attached).

GROUNDS:

- a. That the impugned dismissal order is illegal, void ab initio, unlawful, unconstitutional, without authority and is violative of law.
- b. That the impugned order / notification is the result of misreading and non-reading of material present on case file.
- c. That the respondent has got no authority to dismiss the services of appellant. Legally he can appoint civil servants from scale 1 to 10, while the appellant is in scale 12, thus he has no authority to dismiss the appellant from service.
- d. That the appellant has been given copy of the inquiry report allegedly conducted on 28/05/2015, without annexure. Copy of which is attached. The appellant approaches the respondent for the complete annexure of inquiry report, but he was denied the copies of record. It was brought within the notice of respondent that production of copies is not only the fundamental right of the petitioner as is enshrined under Article 19-A of the Constitution of Islamic Republic of Pakistan, but also legal right under the Right to access to Information Act of 2013 of the Khyber Pakhtunkhwa.

*Amir*  
*Attest*  
*Advocate*

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- e. That the appellant have years of unblemished service record at his back and performed untarnished duties in the office of D.E.O. (Male) Swat always at a level of satisfaction of all his superior.
- f. That for the last one year with the manipulated conspiracies and connivance of a few others, the appellant have frequently been implicated in false, frivolous cases and the inquiry officer Mr. Riaz Ahmad Head Master GHS Asala is one amongst them.
- g. That the inquiry officer conducted inquiry against the rules in hasty manner at the back of the appellant without confronting any document or prosecution witness to assess their veracity and to cross examined the witness. There was neither any complaint nor companionate against the appellant to prove the false and frivolous allegations. The inquiry officer conducted the role of prosecution and did not conducted the impartial inquiry, all the inquiry proceedings have been conducted secretly on the back of the appellant from the page 2 of the inquiry report, list of documents has been given, which shows that a single witness has been examined by the inquiry officer. It is very much strange that how the allegation have been declared proved by the inquiry officer. It is pertinent to mention here that the inquiry officer has a personal grudge with the appellant, thus the inquiry officer conducted the whole inquiry unilaterally, illegally, without summoning and informing the appellant without given opportunity of cross examination to the appellant and without giving opportunity of examination of witnesses against the appellant in his presence, thus the appellant has been condemned unheard and the golden principle of law and justice, that no one should be condemned unheard, has grossly been violated as well as the law and rules.

*Attested*  
*Advocate*

- (H)
- (22)
- h. That the inquiry officer has malafidely written the inquiry against the appellant by conducting the bias and partial inquiry in single capacity, whereas all such inquiries under the control of the respondent has been conducted by eighteen inquiry officers and never by an individual inquiry officer specially who has a bias against the appellant.
  - i. That the appellant has not been given opportunity of personal hearing, which is sheer violation of law and justice.
  - j. That it is evident from the face of record that the whole matter is a planted conspiracy against the appellant. Despite the fact that the so-called complainant Mr. Taukal Jan Sweeper GMS Torwal Swat and other witnesses have given written statement-in the shape of affidavits, but the said affidavits were not considered by the respondent, while passing the impugned dismissal order / notification. It is pertinent to mention here that the original copy of affidavit of Mr. Taukal Jan has been snatched away by the respondent himself from the appellant, but the appellant is in possession of the photocopy of the same. (Copies are attached).
  - k. That the alleged complainant Mr. Taukal Jan has again given a fresh affidavit in favour of the appellant, wherein he has stated before the Oath Commissioner that the statement which he has given regarding the appellant is totally baseless and incorrect and the entry in his service book has been effected by one Mr. Zulfiqar Ul Mulk Deputy District Education Officer and the NIC has been made by Jehangir S/o Rasool Khan R/o Torwal. (Copy of affidavit is attached).
  - l. That the appellant has not been given final show cause notice, hence the dismissal order is in violative of law and rules on the subject and is not maintainable.

*Unfiled  
Altered  
Kashmiri  
Advocate*

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- m. That the appellant has not been given opportunity to cross examine the complainant.
  - n. That no authorize officer has been appointed, which is violative of law and rules on the subject.
  - o. That no show cause notice has been issued by the authorized officer.
  - p. That the appellant has not been given reasonable time for defense and personal hearing and his request has been turned down by the respondent.
  - q. That the inquiry has been conducted before show cause notice, which is in sheer violation of law.
  - r. That the impugned dismissal order is arbitrary, unilateral and whimsical.
  - s. That not a single witness has been examined regarding the alleged bribery by the inquiry officer, so how the statement of Taukal Jan can be relied upon, when he has not been subjected to cross examination.
  - t. That the appellant has been made a scape goat.
  - u. That no date, day and time has been mentioned regarding the alleged corruption and entry, and there is nothing incriminating against the appellant.
  - v. That explanation has been called from the Deputy D.E.O. by the respondent regarding the alleged wrong entry in the service book of Taukal Jan, but he has not been charge sheeted, thus the respondent acted with discrimination.
  - w. That some grounds may be argued at the time of arguments with the prior permission of this Hon'ble Appellate Authority.

It is, therefore, humbly prayed that on acceptance of this appeal, the impugned notification / dismissal order may kindly be declared as illegal, void ab inito, by

*Chhaya J*  
*Advocate*  
*Ward No 10*  
*Advocate*

setting aside the same and the appellant may graciously  
be reinstated with all back benefits.

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Appellant

*dated: 23-6-2015*

*A. Khaliq*  
Abdul Khaliq K.P.O. S/o Abdul Sadiq

Certificate:

It is certified that no such like appeal  
is either pending or decided by this  
Hon'ble Tribunal and that all the contents  
of this memorandum of appeal are true and  
correct to the best of my knowledge and belief.

Deponent

*A. Khaliq*  
Abdul Khaliq (Appellant)

*Handwritten notes:*  
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Attest  
Handwritten signature  
Adeeb

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OFFICE OF THE HEADMASTER GOVT: HIGH SCHOOL ASALA DISTRICT SWAT.

No: 822

Date: 28-05-15

To,

The District Education officer (Male)  
Elementary and Secondary  
at Gul kada Saidu Sharif Swat.

*Supt. Sec*  
*Put up for further*  
*process*  
*28/5/15*

Subject: Enquiry about the variation in date of birth in R/O Mr: Tawakal Jan (Sweeper) GMS Toorwal Swat.

Date of Enquiry: 25/05/2015 and 27/05/2015.

Date of Submission report: 28/05/2015.

Sir,

I would like to bring in your kind notice that I had been appointed as an enquiry officer by your good sell office order Endst No: 2731-33, date: 08/05/2015, to carry out a detail enquiry regarding the above noted subject. In this regard, my findings are as under.

Findings.

In order to prove or disprove the variation in date of birth in R/O Mr: Tawakal Jan (Sweeper), I informed telephonically the Headmaster of GMS Toorwal Mr: Sher Bahadar Khan (SST) that he along with Mr: Tawakal Jan (Sweeper) attend the office of the under signed. They did so and attend the office on 25/05/2015.

So, I the under signed started the enquiry and put some questions on Mr: Tawakal Jan (Sweeper) in the presence of H.M, GHS Toorwal that why and how did you change your date of birth in CNIC and service book. In this regard he explained that he was appointed as a sweeper in Education Department on 30/11/1994. Sir, I am a poor man and the job is the only way of earning for me. As my retirement date was going to be matured. I went to DEO (Male) Swat office and unfortunately there I met with Mr: Abdul Khaliq (Clerk) and asked him that is there any way for the appointment of my son after my retirement. He asked me about the age of my son. I told him that the age of my son is sixteen year's old. So, Mr: Abdul Khaliq (Clerk) suggested to me that I will change your date of birth in your service record. For this purpose, you will have to pay some amount to me and as well as you will have to change the date of birth in your CNIC. (See Annex- 3).

So, I changed my date of birth in CNIC (See Annex- 4) and then paid forty six thousand rupees (Rs: 46000/=) to Mr: Abdul Khaliq (Clerk) for the change of my date of birth in my service record. He did so and changed my date of birth in my service book and C/Signed it by DDO (See Annex- 5). He also submitted a source for change in my date of birth at District Account office Swat which was returned with the remarks that as date of birth changed on 19/06/2014 and it can be changed within the two years from the date of appointment. (See Annex- 6). Meanwhile, the death of my wife has been occurred on this occasion, Mr: Abdul Khaliq (Clerk) told me that there is a way by which you can get sixty thousand rupees (Rs: 60000/=) from the department for the purpose of (Kafan, Dafan) of your wife. In this regard, I will prepare the file, if you pay five thousand rupees (Rs: 5000/=) to me. I did so and paid the required amount to him. In this way I paid total fifty one thousand rupees (Rs 51000/=) to him. (See Annex- 7).

According to Mr: Tawakal Jan (Sweeper) statement that when Mr: Abdul Khaliq (Clerk) has come to know through some reliable sources that Mr: Tawakal Jan (Sweeper) submitted a written statement to the enquiry officer about the amount which was given to him. He came to Bahrain on 26/05/2015 and paid fifty one thousand rupees (Rs: 51000/=) to me and also signed a statement from me with the remarks that it is the receipt of RS: 51000/-. He also requested to me that when face to face identification

*Attested*  
*Advocate*

295  
28/5/15

process carried out at DLO (M) office, you deny to identify me with the remarks that the person/official who received the amount (Rs: 51000/-) is not this one.

According to Mr: Tawakal Jan (Sweeper) that when I was coming to the Headmaster GHS Asala on 27/05/2015 to inform him that Mr: Abdul Khaliq (Clerk) returned his amount on 26/05/2015. Mr: Abdul Khaliq (Clerk) requested telephonically again and again that do not go to the office of enquiry officer and also change your statement (See Annex- 8).

Conclusion:

According to the above mentioned findings, I reached to the conclusion that Mr: Twakal Jan (Sweeper) is an innocent/uneducated person and having poor financial position. While Mr: Abdul Khaliq (Clerk) cashed the poor financial position/helplessness of Mr: Tawakal Jan (Sweeper). So, he was found guilty and the king of corruption in the light of allegations levelled by Mr: Tawakal Jan (Sweeper)

Recommendation/Suggestion.

To sum up the matter, I would like to suggest that keeping in view the innocence, illiteracy and helplessness of Mr: Tawakal Jan (Sweeper), his retirement may please be considered according to the date of birth in his old CNIC and service book record (un-changed).

While the act/conduct of Mr: Abdul Khaliq is illegal, unlawful and the gross violation of law, therefore, he may please be treated under the Khyber Pakhtunkhwa Government servants (Efficiency and Disciplinary) Rules 2011 and major penalty should be imposed on him.

*List Annexed Documents*

S.No	Subject	Page
01	Statement of Tawakal Jan (Sweeper) dated: 25/05/2015.	3
02	The photo copy of new CNIC.	4
03	The photo copy of the S/book page in which D.O.B has been changed.	5
04	The photo copy of the source for the change in D.O.B.	6
05	Detail of amount.	7
06	Statement of Tawakal Jan (Sweeper) dated 27/05/2015.	8
07	Appointment order of Tawakal Jan.	9
08	Medical (Health and Age).	10
09	The photo copy of pay roll.	11
10	The photo copy of old CNIC.	12
11	The recorded video of the statement of Tawakal Jan (Sweeper).	13

*Handwritten signature*  
Attestor  
*Handwritten signature*  
Advocate

*Handwritten signature*  
**Superintendent**  
D.E.O Malik Swat

*Handwritten signature*  
**(Raiz Ahmad)**  
Headmaster  
Govt: High School Asala  
District Swat

## انکوائری

جناب عالی! حسب ذیل عرض ہے۔

- 1- یہ کہ سائل عبدالحق ولد عبدالصادق ساکن کالج کالونی، سیدو شریف ضلع سوات کا ہوں اور بطور KPO محکمہ تعلیم میں DEO میل میں ڈیوٹی سرانجام دینے رہا تھا۔
- 2- یہ کہ سائل اپنی ڈیوٹی انتہائی دیانتداری اور ایمانداری سے سرانجام دیتا تھا اور دینے کو تیار ہوں۔
- 3- یہ کہ توکل جان سو پیر جو کہ توروال بحرین کے سکول میں تعینات تھا۔ جس کے سروں بک میں ذوالفقار (DDEO) نے غلط انٹری کی تھی۔ جس کی سارا ثبوت سائل کے پاس موجود ہے لیکن چونکہ سائل کے ساتھ DEO میل اور DDEO ذوالفقار تعلقات ناخوشگوار تھے اور انہوں نے موقع سے فائدہ اٹھاتے ہوئے سائل کو اپنی نوکری سے بے گناہ Dismissed کر دیا ہے۔ جو کہ سائل کے ساتھ سراسر زیادتی ہے۔
- 4- یہ کہ اپ صاحبان نے جوری انکوائری آفیسرز (1) سیف الرحمان (پرنسپل GHS نوشہرہ) (2) اور ایس (کلرک بمقام DEO میل نوشہرہ) مقرر کیئے ہیں ان کے بھی مذکورہ DEO اور DDEO کے ساتھ گہرے تعلقات ہیں اور سائل کو یقین ہے کہ وہ ان کے ساتھ ساز باز کر کے سائل کے خلاف رپورٹ دیں گے۔
- 5- یہ کہ چونکہ سائل کو بے گناہ برطرف کیا گیا ہے اس لئے اپ صاحبان از خود نوٹس لیکر سائل کے منی برانصاف فیصلہ کیا جا کر سائل کو اپنی نوکری پر دوبارہ بحال کرنے کا حکم صادر فرمایا جائے۔

A. Chohan عریض

عبدالحق

کاپی برائے

1: سیکرٹری ایلیمنٹری اینڈ سیکنڈری ایجوکیشن پشاور۔

المزوم: 28 آگست 2015

Unit to  
Attest  
Mansoor  
Advant

15002-0390251-1

1954

SHER BAHADAR Head Master  
G.M.S Toorwal Swat. on Officer,  
la.

19  
28

Through: - PROPER CHANNEL

Subject: - APPLICATION FOR THE GRANT OF SANCTION FOR 365 DAYS ENCASHMENT IN LIEU OF LPR AND RETIREMENT FROM SERVICE ON SUPERANNUATION FROM 28/11/2014. (A.N)

Respected Sir,

With great regards it is stated that I am performing my duty as Sweeper B-02 at Government Middle School Toorwal District Swat. I was appointed as Sweeper on 30/11/1994. I have completed 19 years, 11 months and 28 days service against the pension able post. My date of birth as per original Service Book is 29/11/1954. I am due to be retired from service on attaining the age of superannuation 28/11/2014 (A.N).

I, therefore, request you to kindly grant me the encashment in lieu of LPR sanction from 29/11/2013 to 28/11/2014= 365 days and retirement from service.

Yours Obediently.

*Tawkal Jan*

TAWKAL JAN  
SWEEPER B-02  
GMS TOORWALL SWAT.

*[Signature]*  
OATH COMMISSIONER  
25-6-15

*Attested  
Attested  
Attested*



The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

29

Name: Mr. TAWAKAL JAN

Race: Afghan

Residence: village Torawal p.o. Bahria Distt. Swat

Father's name and residence: Mr. Adil

Attested

Date of birth by Christian era as nearly as can be ascertained: 01-06-1956 (June first)

D.O.B. registration made in presence of CNIC issued by District Education Officer Swat 2/11/956

District Education Officer Swat

Exact height by measurement: 5-7

Personal marks for Identification: wounded on face on right side

Left hand thumb and Finger Impression of (Non-Gazetted) Officer.

Little Finger

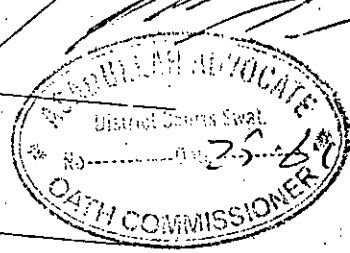
Ring Finger

Middle Finger

Fore Finger

ATTESTED TO BE TRUE COPY

Thumb



Signature of Government Servant

Signature and Designation of the Head of the Office, or other Attesting Officer: D.J. Distt. Education Officer (M) Secondary, SWAT

Attested by Adalat

MEDICAL CERTIFICATE.

30

Name & Official: *Mr. Tansakal Jam*  
 Caste or race: *Afghan*  
 Father's name: *Mr. Adil*  
 Residence: *village, toorwal P.O. Behrain*  
*Distt. Swat*  
 Date of birth: *1955*  
 Exact height by measurement: *5' 3"*  
 Personal mark of identification: *wounded mole on face on right side*  
 Signature of the Official: *(Signature)*  
 Signature of head of office:

Seal of Office

*(Signature)*  
 District Education Officer (M)  
 Secondary, Swat.

I do hereby certify that I have examined Mr. *Tansakal Jam* a candidate for employment in the office of the *Ed. Dept. Swat* and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except *none*.

I do not consider this as disqualification for employment in the office of the *Swat* *Ed. Dept. Swat* his age according to his own statement *40* years and by appearance about *Forty* years.

*(Signature)*  
 Dr. Mohammad Huda  
 M.B.D.C.P.

ATTESTED TO BE TRUE COPY

29.11.94  
 Medical Superintendent,  
 Civil Hospital

LEFT HAND THUMB AND FINGER IMPRESSIONS  
*29.11.94*  
*ML*  
*29.11.94*  
*ML*

*(Handwritten notes)*  
 Attested to  
 Head Master  
 Advokat

*(Signature)*  
 SHER RAHADAR  
 Head Master  
 G.M.S Toorwal Swat

ASADULLAH ADVOCATE  
 District Courts Swat  
 No. *276*  
 DISTRICT COMMISSIONER



ایڈووکیٹ/دستخط

بار کونسل ابار ایسوسی ایشن نمبر

رابطہ نمبر: 03009367365



11416

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سپروائسنگ ایڈووکیٹ جنرل پشاور

منجانب: دستخط (عبدالملک)	دعویٰ: سپروائسنگ ایڈووکیٹ
عبدالملک	محلہ نمبر:
بنام ۲۴۰ ونگ	موردہ:
	جرم:
	تھانہ:

### باعت تحریروانکہ

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

آن مقام سپروائسنگ ایڈووکیٹ جنرل پشاور کے ہاتھ آئے ہیں۔ اس کے بعد اس نے اپنے وکیل کو 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 تقریر و فیصلہ برصط دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زوریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا تاخیر یا غیر فریاد یا اہل کی برائگی اور منسوخی نیز دائر کرنے اہل نگرانی و نظارتی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساتھ ہی منظور و قبول ہوگا اور ان مقدمہ میں جو خرچہ ہر جہانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف و سول کرنے کا مختار ہوگا کوئی خارج 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 مندر ہے۔

المرقوم: 28/9/15

واہ شد

مقام پشاور کے لئے منظور ہے۔

Accepted at Peshawar

نوٹ: اس ہجرت نامہ کی ذمہ داری قابل قبول ہے۔

عبدالملک  
A. Khan  
602-0467234-7