

# FORM OF ORDER SHEET

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

Case No. - \_\_\_\_\_ 773/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of Judge
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1

2

1-

05/04/2023

The appeal of Mr Hidayat Ullah resubmitted today by Mr. Mansoor Salam Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on \_\_\_\_\_

By the order of Chairman


  
REGISTRAR

The appeal of Mr. Hidayat Ullah Chowkidar GGHS Khe! Lakki Marwat received today i.e. on 04.04.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal has not been flagged/marked with annexures marks.
- 2- Memorandum of appeal be got signed by the appellant.
- 3- Annexures of the appeal are unattested.

No. 1086 /S.T,

Dt. 05/04 /2023

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Mansoor Salam Adv.  
High Court Peshawar.

- After putting objection, filed was received by counsel of the Appellant on: 05/04/2023
- All the objection has been removed and resubmitted on the same date as mentioned above. i.e. 05/04/2023.

Mansoor Salam  
Advocate High Court

Salam  
05/04/23

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

SERVICE APPEAL NO. 773 /2023

Hidayat Ullah

V/S

E&S KPK Deptt:

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THROUGH

APPELLANT

*Mansoor Salam*

**MANSOOR SALAM**  
**ADVOCATE HIGH COURT**

(1)

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

SERVICE APPEAL NO. 773/2023

Hidayat Ullah Ex-ChowkidarBPS-07

Government Girls High School Dello Khel, Lakki Marwat

(APPELLANT)

VERSUS

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
2. District Education Officer (F) District Lakki Marwat.

(RESPONDENTS)

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 AGAINST THE ORDER DATED 07.06.2022, WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE AND AGAINST NOT TAKING ACTION ON DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.**

**PRAYER:**

**THAT THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 07.06.2022 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED INTO HIS SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE EXTENDED IN FAVOUR OF APPELLANT.**

**RESPECTFULLY SUBMITTED**

**FACTS:**

1. That the appellant has appointed in the respondent department in the year 2007 and was performing his duty with great devotion and honesty, whatsoever assigned to him and no complaint has been filed against him regarding his performance.
2. That the appellant has falsely been charged and criminal case was registered against the him vide FIR No.664 dated 20.10.2020 U/S 506/186/189/34 P.P.C P.S Lakki. (Copy<sup>1</sup> of FIR is Attached as Annexure-A)
3. That the appellant applied for regular bail which was accepted on 09.11.2020 whereas his co-accused i.e. wife Fozia Begum's BBA was also confirmed on 23.11.2020 in the aforementioned FIR.(Copies of Regular Bail Order dated 09.11.2020 & BBA order dated 23.11.2020 are attached as Annexure-B&C)

4. That no sooner the complainant of the said FIR i.e. the then School Principal GGHS Dello Khel had registered an online complaint No.1-55/2020 before the Provincial Ombudsperson Khyber Pakhtunkhwa dated 03.11.2020 under the Protection against Harassment of Women at Work Place Act, 2010. **(Copy of the Complaint is attached as Annexure-D)**.
5. That on one hand the appellant was charged/busy in criminal case trial proceedings while recording examination-in-chief & cross examination before the competent court of law, whereas on the other hand Provincial Ombudsperson had initiates proceedings/hearing against the appellant in complaint No.1-55/2020 without informing the appellant, which means that a single notice has not been received by the appellant from Provincial Ombudsperson.
6. That inquiry was conducted by the Provincial Ombudsperson's investigation officers where they never associated appellant in the inquiry, despite that the inquiry officers gave their controversial findings & recommended that the appellant deliberately refused to associate in inquiry proceeding, factually inquiry was solely prepared inside the room of Government Primary School Dello Khel, which is mere allegation and nothing else. **(Copy of Ombudsperson Inquiry Report is attached as Annexure-E)**
7. That while to initiate two (2) parallel, baseless criminal proceedings with mala-fide intentions & personal grudges at the same time i.e. FIR No.664 in PS Lakki dated 20.10.2020 & Complaint No. 1-55/2020 dated 03.11.2020, appellant has been declared acquitted by the competent court of law in the FIR No.664 vide judgment dated 25.05.2022. **(Copy of the Judgment dated 25.05.2022 is attached as Annexure-F)**
8. That in light of alleged inquiry report, Ombudsperson has delivered ex- parte Judgment dated 25.03.2022, where in it has been mentioned that the appellant be removed from service vide order dated 07.06.2022 without adopting proper procedure, however the judgment of Ombudsperson has never been communicated to the appellant and appellant has been kept in dark while initiating the proceedings & passing the ex-parte judgment against the appellant. **(Copy of the Ex-parte Judgment of Ombudsperson dated 25.03.2022 is attached as Annexure-G)**
9. That on the basis of Judgment dated 25.03.2022 the appellant has been removed from service while initiating the departmental proceeding, however the appellant was not inform of the same, noted that the appellant was facing the criminal proceeding/trial before the competent court of law.
10. That while the appellant was removed from service vide order dated 07.06.2022, the order has also not communicated to the appellant,

however the appellant has been inform regarding the removal from service in a meeting arranged in the Assistant Commissioner Lakki Marwat Office with elders of localities about the matter of School, on dated 26.11.2022. **(Copy of Impugned Order dated 07.06.2022 is attached as Annexure-H)**

11. That the appellant being aggrieved from the impugned order dated 07.06.2022 has preferred a departmental appeal on 06.12.2022 and submitted the same on 07.12.2022 bearing dairy No.4197, however that too hasn't considered within the statutory period of 90 days. **(Copy of Departmental Appeal dated 07.06.2022 is attached as Annexure-I)**
12. That the appellant has no other remedy except to file the instant service appeal in this Hon'ble Tribunal on the following grounds amongst others.

**GROUND:**

- A. That the impugned orders dated 07.06.2022, is against the law, facts, norms of justice and material on record, therefore, not tenable and liable to be set aside.
- B. That no departmental inquiry has conducted against the appellant according to the prescribed procedure as the appellant was engaged in criminal case before the competent court of law and never associated with the inquiry proceeding, which is violation of law and rules, hence the impugned orders are liable to be set aside on this ground alone.
- C. That no opportunity of defense has been provided to the appellant during inquiry proceeding, which is violation of Article-10A of the Constitution of Pakistan.
- D. That judgment of Provincial Ombudsperson is illegal, void, and without lawful authority and clear violation of Article 13 of the Constitution of Islamic Republic of Law.
- E. That the Provincial Ombudsperson Judgment's and their inquiry is totally depends on the discussion of the Investigation Officer of Ombudsperson, so when the inquiry findings & judgment of Ombudsperson based on the statements of the concerned IO of the case then the interest of justice demand that the departmental proceeding against the appellant should be kept till the decision of the criminal case pending against the appellant.
- F. That the inquiry officers of Ombudsperson in their finding mentioned that appellant did not appear before the inquiry, factually IO of Ombudsperson never tried to associate the appellant in inquiry and prepare one side inquiry inside the premises of Govt Girls Primary School Dello Khel, hence as per superior court no one be punished on the one side inquiries and by punishing the appellant on information through ex-parte judgment is clear violation of the superior courts judgments.

- G. That it is cherished principle of law that where a law required a thing to be done in particular manner, the same has to be done in that manner and not otherwise.
- H. That as per Superior Court judgments, mere filling online complaint, holding one side inquiry and delivering ex-parte judgment does not proves a person to be guilty of the commission of offence, rather he would be presumed innocent unless convicted by the court of competent jurisdiction.
- I. That the appellant has been penalized by remove him from service, whereas all the proceeding against the appellant is against the Article 13 of the Constitution 1973.
- J. That the appellant has been condemned unheard and has not been treated according to law and rules.
- K. That the appellant seeks permission of this Hon'ble Tribunal to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.

THROUGH

APPELLANT

Mansoor Salam

**MANSOOR SALAM  
ADVOCATE HIGH COURT**

**CERTIFICATE:**

It is certified that set-aside application has filed by the appellant before the Ombudsperson against the judgment dated 25.03.2022 earlier.

**DEPONENT**

(5)

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

SERVICE APPEAL NO. \_\_\_\_\_/2023

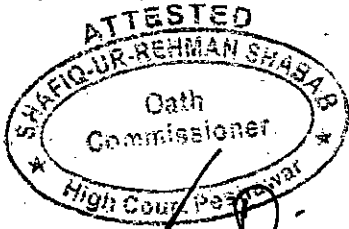
Hidayat Ullah

V/S

E&S Edu Deptt: KP

**AFFIDAVIT**

I, Hidayat Ullah Ex-Chowkidar Govt Girls High School Dello Khel, Lakki, Marwat (Appellant) do hereby affirm and declare that the contents of this service appeal are true and correct and nothing has been withheld from this Hon'ble Tribunal.



**DEPONENT**  
Hidayat Ullah  
(APPELLANT)  
CNIC: 11201-4332065-5  
Cell: 0318-9873185

*H. Ullah*  
04/04/23.





دستور العمل کے تحت اس کی تصدیق ہوگی۔  
 دستاویز کے ساتھ گواہی کے ساتھ ساتھ اس کی تصدیق ہوگی۔  
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TESTED  
 Director General of Police  
 Government of Punjab  
 Lahore

20/1/2005

دستخط

عہدہ

نوٹ: اطلاع کے نیچے اطلاع دہندہ کا دستخط ہوگا۔ یاس کی مہر یا نشان لگایا جائیگا۔ اور اس پر تحریر کنندہ ابتدائی اطلاع کا دستخط بطور تصدیق ہوگا۔ حروف الف  
 سرخ روٹنائی سے بالفاظ تمام پر ایک طرز یا مشہور علی الترتیب واسطے باشندگان علاقہ غیر یا وسط ایشیا یا افغانستان جہاں سوزوں ہوں۔ لکھنا چا

3

**IN THE COURT OF ADAM KHAN SULEMAN KHKEL  
SCJ/MAGISTRATE SEC:30 Cr.P.C, LAKKI MARWAT**

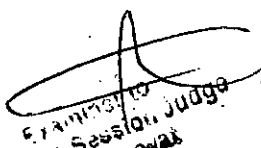
**Hidayat Ullah-Vs-State  
Bail Application# 408/4 Of 2020**

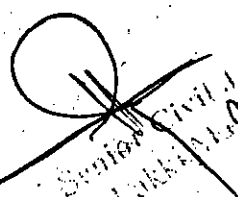
**Or.....07:**

09-11-2020

1. APP for State present.
2. Both learned counsel for accused/petitioner and for complainant submitted written arguments.
3. The accused / petitioner **Hidayat Ullah S/o Dost Muhammad R/o Dalo Khel Tehsil & District Lakki Marwat** charged in case **FIR # 664 dated 20-10.2020 u/s 506/186/189/34 PPC** of **PS Lakki** seeks his release on bail in the subject case.
4. Arguments heard and record gone through.
5. Perusal of the record transpires that accused/ petitioner has been charged u/s 506/186/189/34 PPC. Section 186 PPC is bailable whereas 506 PPC does not fall under prohibitory clause of Section 497 CrPC. It is further evident from the record that accused was empty handed and nothing incriminating like any weapon was recovered from the possession of accused. It will be determined at the time of trial as to which clause of Section 506 PPC is applicable to the case of accused/petitioner. Accused/petitioner remained in police custody but he has neither made confession nor has anything been recovered from him. Keeping in view the contents of the FIR, case of the accused/petitioner is one of further inquiry.

**ATTESTED**

  
Franky  
District & Session Judge  
Lakki Marwat

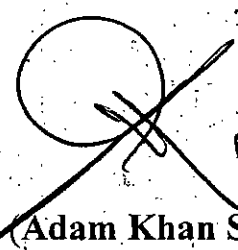
  
Senior Civil Judge  
Lakki Marwat  
09/11/2020

**Hidayat Ullah-Vs-State**  
**Bail Application# 408/4 Of 2020**

**Continued.....Or.....07:**

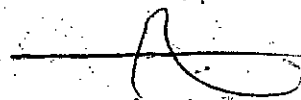
6. Accused/petitioner is behind the bar and no more required to the local police for further investigation.
7. In view of the above discussion, the application is accepted and the accused / petitioner is admitted to bail subject to furnishing of bail bonds in the sum of Rs.200,000/- (two lacs) in the like amount with two local and reliable sureties to the satisfaction of this Court/MOD, if not required in any other case.
8. Record along with copy of this order be returned and file be consigned to record room after its necessary completion and compilation.

**Announced:**  
 09-11-2020

  
 (Adam Khan Suleman Khel)  
 SCJ/Magistrate Sec:30 CrPC  
 Lakki Marwat

D No. 2310  
 Application received on 27-3-23  
 Copying Fee deposited on 27-3-23  
 Judgment received for copying 27-3-23  
 No. of words 23  
 Copying Fee 23  
 Search Fee 23  
 Urgent Fee 23  
 Name of Copyist 23  
 Copy Completed on 27-3-23  
 Copy Delivered on 27-3-23  
 Name of Examiner 23

**ATTESTED**

  
 Examiner to  
 District & Session Judge  
 Lakki Marwat

IN THE COURT OF KASHIF DILAWAR  
ADDITIONAL SESSIONS JUDGE-I,  
LAKKI MARWAT.

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Fozia Begum Vs State  
BBA No.708 of 2020

Or.....09  
23-11-2020

Mr. Javaid Akhtar, learned Deputy Public Prosecutor for the State and clerk counsel for complainant present.  
Accused/petitioner on ad-interim bail present.

Accused/petitioner Mst: Fozia Begum wife of Hidayat Ullah r/o Dalo Khel Tehsil & District Lakki Marwat seeks confirmation of her ad-interim pre arrest bail, being involved in case FIR No.664 dated:20/11/2020, registered u/s 506/186/189/34 PPC of PS Lakki District Lakki Marwat.

Brief facts as per FIR are that on 13/10/2020, complainant Shahida Gul, Principal GGHS, Dalo Khel District Lakki Marwat submitted an application to District Police Officer, Lakki Marwat to the effect that she was posted as Principal, GGHS, Dalo Khel since three years. That Hidayat Ullah, Chowkidar was negligent in performing his duties and frequently refused to perform his duties due to which electricity boards were broken and two computers and one regulator were missing. That complainant had sent several complaints to DEO(F), Lakki Marwat against Hidayat Ullah and in response thereof two inquires were initiated against Hidayat Ullah but due to non-interest no action was taken against him. That due to the said reasons, Hidayat Ullah Chokwidar had several times closed the school and not allowed principal, teachers and students to enter into the school and also forbidden Class-IV

23-11-2020

TESTED  
23-11-2020

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(11) 2

employees from going to the school. That wife of Hidayat Ullah namely Fozia forcibly entered into the office of principal and harassed the principal and other teachers and intended to sign the written statement on paper which the principal refused. That Hidayat Ullah and his wife Fozia had forbidden the complainant not to come to the school and also threatened the complainant for dire consequences and requested that one lady constable and one constable be deputed for the security of school so as to avoid from un toward incident, hence the instant FIR.

Learned defense counsel argued that the accused / petitioner was innocent and was falsely charged on account of some misconception. He further argued that no time and date of occurrence was mentioned in the FIR. That accused/petitioner was falsely implicated in the instant case due to personal grudge of the complainant. That accused / petitioner never remained involved in such like cases. That there was no independent witness and other reliable evidence against the accused / petitioner. That co-accused having similar role was allowed bail, therefore, rule of consistency also applied to the case of accused/petitioner. That the offences did not fall within the ambit of prohibitory clause of Section 497 Cr.P.C. He further contended that grant of bail in such like cases was a rule where its refusal was an exception and requested for confirmation of instant bail of the accused/petitioner.

On the other hand, the learned DyPP assisted by private counsel opposed the arguments advanced by learned counsel for the accused/petitioner and argued that accused/petitioner was directly

charged in the FIR for a criminal intimidating the public servant. That only tentative assessment was to be made at bail stage and deeper appreciation of evidence was not permissible at this stage, hence, not entitled to be released on bail.

I have heard the arguments advanced by counsel for the accused/petitioner, DyPP for the state and learned counsel for the complainant. Record is perused.

**ATTESTED**  
Signature to  
District & Session Judge  
Lakh Nagar

Signature  
23-11-2020

Perusal of record it is revealed that though the accused/petitioner and her husband have directly been charged for the commission of offense but there is nothing on record to suggest that the accused/petitioner had ever remained involved previously in such like cases. Further, the offence attributed to the accused are bailable and punishment of the alleged offence also falls out of the restrictive clause. Furthermore, as per tentative assessment of the available record the instant case is not only seems one of further inquiry rather the possibility of false implication of the accused on the score of allegations against her husband being employee of the school of the complainant with mala fide intention can also not be ruled out. Moreover, co-accused has been allowed regular bail by the court of concerned magistrate, therefore, rule of consistency also applicable to the case of present accused/petitioner. In addition thereto, it is held by the apex courts that if the case of the prosecution is of further probe, the period for which he would remain behind the bar could not be compensated if prosecution failed to prove the guilt of accused/petitioner during trial. Therefore, handing him to police is not necessary as per principles laid down by the

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Apex Court for grant of pre arrest bail which are not at all different from the consideration for grant of post arrest bail, as far as merits of the case are concerned. Only difference is that there must be additional basis of humiliation, harassment, malafide, intention to disgrace and dishonor of a person is otherwise entitled to bail, no useful purpose shall be served by putting him firstly behind the bar and then allowing him bail. Court has to keep a balance of a fit case for grant of bail is made out, bail before arrest should be allowed in appropriate cases. All these facts put the case of accused/petitioner within the domain of further inquiry.


Thus keeping in view the circumstances above mentioned and available record, the case requires further probe and is arguable for the grant of pre arrest bail. The accused / petitioner has already joined the police investigation and in the given position the remanding of the accused / petitioner to police custody would be just formality, resultanty the petition is allowed and the ad interim pre arrest bail already granted to the accused / petitioner named above on 22/10/2020 stands confirmed on the existing bail bonds.

File of this court be consigned to record room after necessary completion and compilation while requisitioned record be returned to the concerned quarters.

Announced.  
23-11-2020

ATTESTED

  
Examiner to  
District & Session Judge  
Lakki Marwat

  
(Kashif Dilawar)  
Additional Sessions Judge-I,  
Lakki Marwat.



## OFFICE OF THE PRINCIPAL GGHS DALLO KHEL LAKKI MARWAT

No. 377

999  
11-11-2020

Dated: 3/11/2020

(14)

1025

11-11-2020

خدمت جناب صوبائی مجلس صاحب پشاور

عنوان: درخواست Protection against Harassment of women at the workplace Act, 2010

مردودہ ہدایت اللہ والد دوست محمد چوکیدار GGHS دلوخیل و مسماۃ فوزیہ زوجہ ہدایت اللہ

جناب عالی: حسب ذیل عرض ہے

(۱) یہ کہ ہم سالکان / مستغیث گورنمنٹ گرنزہائی سکول دلوخیل ضلع لکی مروت کی معلمات (Teachers) ہیں اور مذکورہ سکول میں باقاعدگی کے ساتھ اور نہایت فرض شناسی سے اپنی ڈیوٹی سرانجام دی رہی ہیں۔

(۲) یہ کہ ہمارے سکول کا چوکیدار مسمی ہدایت اللہ والد دوست محمد سکندہ دلوخیل گذشتہ ۳ سالوں سے اپنی ڈیوٹی باقاعدگی سے سرانجام نہیں دیتا اور غفلت کا مرتکب ہوتا ہے۔

(۳) یہ کہ ہمارے سکول کا چوکیدار مسمی ہدایت اللہ والد دوست محمد سکندہ دلوخیل اپنی زوجہ مسماۃ فوزیہ کے ساتھ ملکہ ہمیں ہراساں کرتا ہے اور اپنے فرائض کی ادائیگی سے روکتا ہے۔

(۴) یہ کہ چوکیدار مذکورہ کو جب بھی پرنسپل صاحبہ اپنی ڈیوٹی سرانجام دینے کو کہتی ہے تو وہ صاف انکار کرتا ہے اور اسکی ڈیوٹی میں عدم دلچسپی کی بناء پر سکول ہذا سے ایک عدد ریگولر اور کمپیوٹر لیب سے دو عدد کمپیوٹر غائب کر دئے گئے ہیں۔ نیز سکول میں بجلی کے تمام بورڈز بھی چوکیدار نے توڑ دیئے ہیں۔

(۵) یہ کہ ہدایت اللہ چوکیدار اور اسکی زوجہ اس حد تک سینزدور اور سرکش ہیں۔ کہ انھوں نے کئی مرتبہ سکول کو زبردستی بند کروایا اور پرنسپل صاحبہ، استانیوں اور دیگر عملہ کو سکول کے اندر جانے اور ڈیوٹی سرانجام دینے نہیں دیتے اور تمام استانیوں اور پرنسپل صاحبہ و دیگر سٹاف کے ساتھ غیر مہذبانہ اور غیر اخلاقی رویہ رکھتے ہوئے انہیں ڈرا دھمکا کر انہیں اپنی ڈیوٹی سرانجام دینے نہیں دیتے اور ہر وقت غلیظ گالیاں دیکر اور سنگین نتائج کی دھمکیاں دیکر تمام اساتذہ اور دیگر سکول عملہ کی زندگی اجیرن بنا دی ہے۔ (ثبوت کے طور پر تصاویر لطف ہیں۔)

(۶) یہ کہ ہم سالکان / مستغیث نے افسران بالا اور ڈپٹی کمشنر صاحب و ڈسٹرکٹ پولیس آفیسر صاحب سے بھی فریاد کی اور اپنے ساتھ ہونے والے ظلم و ستم، چوکیدار اور اسکی زوجہ کے ناروا سلوک سے پرنسپل صاحبہ، تمام اساتذہ کرام اور دیگر عملہ کو ہراساں کرنے، ڈرانے دھمکانے اور عورت ذات ہونے کی بناء پر ڈیوٹی کی ادائیگی میں رکاوٹیں پیدا کرنے کی بابت اُنکی توجہ دلائی اور تحریری طور پر انہیں آگاہ کیا جو چوکیدار مذکورہ کے خلاف دو مرتبہ انکوائری بھی ہوئی لیکن حکمانہ عدم دلچسپی اور سیاسی اثر و رسوخ اُس کے خلاف کوئی کارروائی نہیں کی گئی۔ (جملہ درخواست ہذا الف ہیں)

PTO

(۷) یہ کہ مورخہ 13/10/2020 کو بھی ہدایت اللہ چوکیدار اور اُسکی زوجہ مسماة فوزیہ نے ہم ساکنان کے ساتھ وہی دھمکی آمیز، مہذبانہ، گالی گلوچ اور گیر اخلاقی ہراساں کرنے والا رویہ اپناتے ہوئے اور ہمیں اور دیگر سٹاف کو سنگین نتائج کی دھمکیاں دیتے ہوئے سولہ کو بھی بند کیا جس بابت DPO صاحب کی مروت کو آگاہ کر کے تحریری درخواست دی جس پر کارروائی ہو کر ان کے خلاف FIR درج ہوئی اور ملزم گرفتار ہوا۔ لیکن اسکے باوجود بھی دوران حراست دھمکیاں دیتا ہے اور اپنی زوجہ کو سکول بھیج کر ہراساں کرتا ہے۔ (نقل FIR درج شدہ لف ہے۔)

(۸) یہ کہ مذکورہ بالا چوکیدار اور اُسکی زوجہ کا سلوک اور غیر مہذبانہ رویہ ہراساں کرنے Harassment کے ذمرے میں آتا ہے اور قابل مواخذہ جرم ہے۔

لہذا استدعا ہے کہ چوکیدار ہدایت اللہ اور اُسکی زوجہ مسماة فوزیہ کے خلاف Harassment of Woman ایکٹ 2010 دیا جو ثابت ہوا کے تحت کارروائی کر کے انہیں قرار واقعی سزا دی جائے۔

العارضة

مورخہ: 3/11/2020

- (۱) شاہدہ گل (پرنسپل GGHS دلخیل) (۲) شمینہ (SST General) (۳) ذکیہ (SST General) (۴) عارفہ (SST General) (۵) پروین (SCT)
- (۶) رضوانہ (SST) (۷) نیلو فر دلاور (SST) (۸) راحیلہ طارق CT (۹) نگہت (SPET) (۱۰) خوشبو (SST IT) (۱۱) صدف (SST) (۱۲) محسنہ (Qaria) (۱۳) رشیدہ بانوں (SCT) (۱۴) طاہرہ (SAT) (۱۵) روزینہ (SDM) (۱۶) روبینہ (SCT) (۱۷) کلثوم (CT) (۱۸) امبرین (STT) (۱۹) سدرہ (Lab Attendent) (۲۰) معراج بی بی (Sweeper) (۲۱) غنی شاہ (Naib Qasid) (تمام جملہ سٹاف کے دستخط بمعہ شناختی کارڈ نمبر لف ہے۔)

CNIC 1/201-7974193-6  
Mob No. 03149880544

Refers to all complainants.

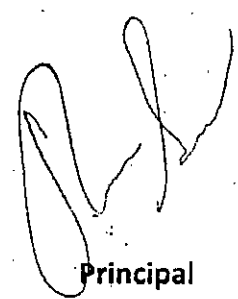
30/11/2020

Signature of all school staff are hereby included:

(4)  
16

That Chowkidar is making hindrances in learning activities of the school for his own mean interests.

Name of Staff / NIC NO	Post	Signature
Samina 11201-0924040-6	SST (G)	Samina Arif
Zakia 11201-0970196-2	SST (S)	Zakia
Aria 11201-0321324-6	SST (G)	Aria
perveen 11201-0346118-8	SCT	Perveen
Rizwana 11201-0365235-4	SST (Chem Bio)	Rizwana
Nilofar Dilawar 11201-5104087-2	SST (Bio, Chem)	Nilofar
Rahila Tariq 11201-0362541-4	CT	Rahila Tariq
Nighat 11201-1559062-6	SPIET (M.S. & H.P.E)	Nighat
Khushboo 11201-3945239-4	SST IT	Khushboo Ahmed
Sadaf 12101-1592388-4	SST (Math, Phy)	Sadaf
Muhsina 11201-8527124-2	Daria (M.Sc) statistics	Muhsina
Rashida Bano 11201-0334133-4	SCT	Rashida Bano
Tahira 11201-0312159-8	SAT	Tahira
Rozina 11201-0310479-8	SDM	Rozina
Robina 11201-0312445-4	SCT	Robina
Balkees 54400-0392416-6	SCT	Balkees
Kalsoom 11201-9286773-0	CT	Kalsoom Akhter
Ambreen 11201-5501978-8	(S TT)	Ambreen
SLDRA 11201-1905319-4	Lab Attendant	Sidra



Principal

GGHS Dallo Khel  
PRINCIPAL  
S.G.H.S Dallo Khel  
Distt. Lakshar

**INQUIRY REPORT IN THE CASE TITLED "SHAHIDA GUL & OTHERS  
(COMPLAINANTS) VS HIDAYATULLAH & OTHERS (ACCUSED)"**  
**CASE NO.1-55**

In above titled case, the KP Ombudsperson's office issued directions for constitution of Facts Finding Committee/Team vide Order Sheet dated 07.09.2021 to visit the Lakki Marwat to conduct facts finding inquiry in the case. Accordingly, a Committee/Investigation Team comprising of Deputy Director (Investigation) & Assistant Director (Investigation) was constituted to make visit on 30.11.2021 and probe the matter.

**PROCEEDINGS OF THE INQUIRY TEAM**

The Ombudsperson's Investigation Team comprising Ms. Nazia Zaki Deputy Director (Investigation) and Mr. Hanif-ur-Rehman Assistant Director (Investigation) reached GGHS School Dallo Khel Lakki Marwat. However, the school was found closed due to shifting of the same to GGPS Dallo Khel Lakki Marwat. Therefore, the Team visited the said School.

The Principal, Staff & Students were interviewed by the Team, details of which are as under:-

**1. SHAHIDA GUL PRINCIPAL (COMPLAINANT):-**

She posted since 2017 in the said School as Principal. The accused was working in GGHS No.4 as punishment by the DEO (Female). Later on, he was transferred to GGHS Dallo Khel. On his transfer to GGHS Dallo Khel, his attitude towards the Principal, staff members & students remained derogatory and threatening, being the owner of the School property. He never performed his duties, rather he stopped the Principal from performing her duties and started damaging assets of the School. An FIR against him was lodged for stealing 02 No. of Computers and a UPS from the School in which he was found guilty upon investigation. Besides, he alongwith her wife namely Ms. Fozia Bibi was habitual for using immoral and abusive language i.e

"رنڈیاں کنجریاں خود چوری کر کے مجھ پر الزام لگاتی ہیں"

In 2019, besides verbal harassment, the wife and aunt namely Fozia Begum & Gul Bano of the Chowkidar, attacked on her wherein she got badly injured. The complainant reported the situation to Director Elementary & Secondary KP, Deputy Commissioner, DPO, DEO (Female) but all in vain.

Statement of the Principal is at Annex-I.

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Ombudsperson Secretariat  
Khyber Pakhtunkhwa

Page 1 of 7

2. Ms. Kalsoom Akhtar Headmistress GPS No.1 Dallo Khel:-

The teaching/non-teaching staff of GGHS Dallo Khel and GGPS Dallo Khel was ordered to exchange School Building with each other on temporary basis. However, when the staff of GGPS Dallo Khel tried to enter in the School Building of GGHS Dallo Khel, the said Chowkidar namely Hidayatullah refrained them to enter in the School Building.

Statement of Headmistress is at Annex-II.

3. Rahila Tariq CT Teacher:-

She stated in her statement that the wife of the accused always used abusive language even she attacked on Ms. Shahida Gul Principal due to which she received injuries. She always used to threaten Principal for signing illegal documents. She further stated that the accused sent messages to the families of the complainants that if teachers came again to school, he will pick off their scarfs (برقعہ). The accused and his wife made hostages the teachers and students till 3:30 for the purpose to get sign on illegal documents from Incharge.

Besides above, she provided additional information, gist of which are reproduced as under:-

"چوکیدار کا دوست صبح سکول آنے والے وقت میں تمام اساتذہ کی ویڈیو بناتا تھا۔ صبح کے وقت تمام ٹیچر اور طالبات برقعوں میں بیٹھی میڈم کے آنے کا انتظار کرتی اور ان کے آنے تک چوکیدار طالبات کو ماؤں بہنوں والی گالیاں دیتا تھا۔ ان سے کہتا کہ تمہاری ماؤں کے کپڑے اتار کر ان کے ساتھ غلط کام کرونگا اور باقی غلط الفاظ استعمال کرتا تھا۔"

میڈم شاہدہ گل کو گھر پہ بیٹھا کر ان کی بہابھی میں پروین سے پوچھتی کہ وہ "رنڈی" کیسی ہے۔

اسکے بعد وہ میڈم کے بارے میں کہتا کہ یہ اب شوہر مانگ رہی ہے۔

Furthermore, on intervention of the Assistant Commissioner concerned, the accused threaten all the staff with following remarks:-

"کہ یہ تو اسسٹنٹ کمشنر ہے اگر خدا بھی نیچے آیا تو پھر بھی آپ کی حالت ہوگی۔ چوکیدار کو پولیس لے گی۔ عدالت میں کیس چل رہا ہے۔"

Statement of the Teacher is at Annex-III.

ATTESTED  
REGISTRAR  
Ombudsman Secretariat  
Khyber Pakhtunkhwa

*[Handwritten Signature]*

*[Handwritten Signature]*

4. Ms. Muhsina Qaria Teacher:-

She has been working since 2012 in the school and her statement are reproduced as under:-

"جوکیدار کبھی افس کے تالے میں گند گھسا دیتا تھا تاکہ تالا نہ کھلے اور ٹیچر کو ٹینشن ہو اور کبھی رجسٹر کی ٹوکی میں گند رکھ دیتا کہ ٹیچر شرمندہ ہوں۔"

She further stated that the accused sent messages to the families of the complainants that if teachers came again to school, he will pick off their scarfs (برقعہ).

Statement of the Teacher is at Annex-IV.

5. Samina Anjum SST (General):-

She stated that the Chowkidar used to ask her to come on Gate from time to time in order to haunt her and also asking for her signature on unnecessary/irrelevant documents. The accused and his wife kept her hostage for not signing the unnecessary/relevant documents.

Statement of the Teacher is at Annex-V.

6. Miraj Bibi Class-IV:-

The gist of statement of the Class-IV is reproduced as under:-

"کہ ہدایت اللہ کی بیوی مسماة فوزیہ بی بی عرضہ دراز سے ہمیں تنگ کرتی آرہی ہے سکول کے اندر ہمیں بہت ہی قبیح اور ننگی گالیاں دیتی تھی اور ہمیں بے جا تنگ کرتی تھی۔"

ہم نے علاقہ کے مشران کو شکایت کی تھی لیکن مسئلہ حل نہ ہوا۔ علاقہ کے مشران نے ہمیں منع کیا کہ فوزیہ کے ساتھ بحث نہ کرو کیونکہ اس سے بڑا مسئلہ پیدا ہوگا۔"

ہدایت اللہ کی بیوی فوزیہ سکول میں آکر ہمیں کہتی کہ آپ لوگوں کو شوہروں کی ضرورت ہے تاکہ آپ کو ٹھنڈا کرے وغیرہ وغیرہ۔"

Statement of the Class-IV is at Annex-VI.

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Ombudsperson Secretariat  
Khyber Pakhtunkhwa

*(Handwritten signatures)*

7. Syed Ghani Shah Class-IV:-

He stated that the Hidayatullah Chowkidar (accused) haunted the Principal and staff for reason to appoint her wife in the said School.

Statement of the Class-IV is at Annex-VII.

8. Urwat-ul-uska Student of Class-7<sup>th</sup>:-

The gist of statement of the student is re-produced as under:-

"جب میں اور باقی بچیاں سکول آتے تھے تو سکول کی کلاسز میں تالا کھولنے کے بعد Bra اور underwear پڑے ہوتے تھے۔ سکول میں ہدایت اللہ موجود ہوتا تھا۔ ایک دفعہ سکول میں سب بچوں کے سامنے ہدایت اللہ کی بیوی فوزیہ بی بی نے میڈم کے ساتھ ہاتھ پائی بھی کی اور گالم گلوچ بھی ہوئی جس کے بعد میڈم کو چوٹ بھی آئی۔ کلاس میں ہر آئے روز کچھ نہ کچھ گندے انڈرویر، برا اور کنڈم پڑے ملتے تھے۔"

Statement of the Student is at Annex-VIII.

9. Laiba, Minhas & Khana Students of Class-10<sup>th</sup>:-

The gist of statement of the students are reproduced as under:-

سکول بچیاں جب بھی صبح سویرے سکول آتی گاڑی کی وجہ سے تو ہدایت اللہ بچیوں کو گالیاں دیتا اور ان کے والدین کے پیچھے گالیاں نکالتا کہ کیوں صبح سویرے آتی ہو اور کیوں یہاں پڑھنے آتی ہوں۔ کہ ماں کو گالی یعنی (تمہاری ماں کے کپڑے نکال کر تمہاری ماں کو راستے میں ننگا کر کے گھسیٹوں گا۔"

In addition to above, the wife of the accused always shown knife to students on closing to left my School quickly.

Statement of the Students is at Annex-IX.

10. Laiba Ameen Student of Class-9<sup>th</sup>:-

The wife of the accused always snatched my food items which I used to bring for the class fellows. She snatched and kept my bag for days and threatened me to leave.

She further stated that:-

"ہدایت اللہ چوکیدار جو بچیاں صبح جلدی آتی تھی ابا خیل سے ان کو یہ کہا جاتا تھا کہ آپ سکول اس لیے جلدی آتی ہیں تاکہ یہ لوگ یہاں سے کسی کے ساتھ بھاگ جائیں۔"

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سکول کی مختلف کلاسز کی بچیوں کے ساتھ یہ سب سلوک ہو چکا ہے جس کے متعلق پورا سکول جانتا ہے۔"

Statement of the Teacher is at Annex-X.

11. Zarshada Bibi, Zarin Taj & Farhat Members Parent Teacher Council:-

زرشادہ بی بی۔ سکول کو اسی جگہ ہونا چاہیے۔

زرین تاج بی بی۔ سکول سے واپسی پر بچیاں چوکیدار اور فوزیہ بی بی کے ناروا سکول کو بیان کرتی تھیں۔ برائے مہربانی آپ اس مسئلے کو حل کریں کیونکہ اس مسئلے کو حل کریں کیونکہ اساتذہ اپنا ٹرانسفر کروائیں گی لیکن ہمارے بچوں کا مستقبل تاریک ہو جائے گا کیونکہ ہم غریب لوگ اپنے بچوں کے مستقبل کے لیے فکر مند ہیں۔

Statements of the PTC Members are at Annex-XI.

12. Mr. Nadar Khan Uncle of the Accused:-

The statement clearly stipulates that the accused always used abusive language having bad character, uncivilized and a thief.

"ہاں بالکل بدتہذیب اور چور بندہ ہے۔ میں سب کاموں سے واقف ہوں کھبی سکول کے پرنسپل، کھبی سٹاف اور دیگر طلباء سے بدزبانی کرتا تھا۔ پرنسپل نے ہر ایک مطلع کیا تھا۔ ہر فورم پر فریاد کیا ہے لیکن انکی شنوائی نہیں ہوتی۔ انتظامیہ کے علم میں بھی لایا گیا تھا لیکن کسی نے بھی غور نہیں کیا۔"

Statement of the Relative is at Annex-XII.

*(Handwritten signatures)*

ATTESTED  
*(Signature)*  
REGISTRAR  
Ombudsman Secretariat  
Khyber Pakhtunkhwa



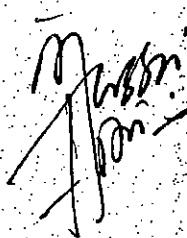
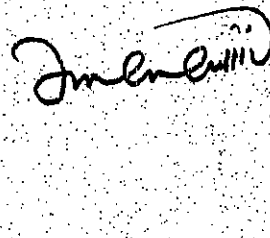
**FINDINGS OF THE INVESTIGATION REPORT:-**

Mr. Hidayatullah Chowkidar had provided Land to Government for construction of GGHS School Dallo Khel Lakki Marwat. On completion of construction of the School, he was appointed as Chowkidar in the said School in lieu of Land. However being owner of the Land, he alongwith family members including his wife started harassing the Staff & Student by one way or another as evident from the above statements. Besides, the complainants time and again filed complaints with the authorities such as Deputy Commissioner, Director Elementary & Secondary Education Khyber Pakhtunkhwa, District Education Officer Lakki Marwat & District Police Officer for arrangements of security but in vain. *In addition, an FIR was also lodged in the Police Station Lakki Marwat. However as per statement of SHO of the said Police Station, the accused was not arrested due to shifting to an unknown place (Annex-XIII) whereas during investigation, the accused was present in his residence and despite calling him by the Investigation Team, he refused with the remarks that he can't attend the investigation for being ill.*

It is pertinent to mention that in the light of judgement of Supreme Court of Pakistan Islamabad, the Government had imposed ban on appointment against in lieu of Land from time to time as per attached letters (English & Urdu Version) Annex-XIV.

2- It is proved from the statements of complainants that the accused not only Harass them *but also placed undergarments and condoms in the Class Rooms on the Desks of the students and in the staff room. The accused alongwith family member also used abusive language for the staff, students and family of the students of the said School and also attacked the Principal where she got injured.*

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3- During investigation, it was revealed by the complainants that the accused was previously terminated because of the similar behavior with Ex-Principal. However, on inquiring about the termination and reinstatement order of the accused, it was informed by the complainants that all the record is custody of the Ex-Principal GGHS Dallo Khel Lakki Marwat.

**RECOMMENDATIONS:-**

1. Mr. Hidayatullah Chowkidar, GGHS Dallo Khel Lakki Marwat may be removed from service under the Protection against Harassment of Women at Workplace as allegations against him have been proved
2. The accused may also be banned from entrance into the premises of the School otherwise the staff & students shall face untoward incident and dire consequences.
3. Despite repeated complaints lodged against accused, the Elementary & Secondary Education Department Khyber Pakhtunkhwa, Directorate of E&SE Khyber Pakhtunkhwa & District Education Office concerned took no appropriate action against the accused in time, which encouraged the accused to continue his illegal and unlawful activities.
4. It is a set procedure that the District Administration of the concerned District is responsible for maintenance of peace and security of the community. However, it is found that besides complaints lodged with Deputy Commissioner Lakki Marwat, neither action has been taken against accused nor security has been provided by the District Administration to the complainants.
5. It is evident from the record that an FIR was lodged against Mr. Hidayatullah Chowkidar (accused) and the worthy Ombudsperson Khyber Pakhtunkhwa time and again ordered for physically producing the accused but the DPO Lakki Marwat reported that the SHO concerned searched the accused everywhere in Dallo Khel but they were not found there. However during investigation, it has been found that the accused was at his home but he did not turn up before the Investigation Team for investigation. Hence, the statements of SHO concerned are baseless.

In case, the Government intends to shift the Principal, Staff & Students to their original building of GGHS Dallo Khel Lakki Marwat, security measures may be ensured to be provided to the Principal, Staff & Students, please.

*(Signature)*  
 (Ms. Nazia Zaki)  
 Deputy Director (Investigation) 13/12/2021

*(Signature)*  
 (Mr. Hanif-ur-Rehman)  
 Assistant Director (Investigation) 13/12/2021

**ATTESTED**  
*(Signature)*  
**REGISTRAR**  
 Ombudsperson Secretariat  
 Khyber Pakhtunkhwa

**IN THE COURT OF HAMID KAMAL  
SCJ (J)/JUDL: MAGISTRATE SEC: 30 Cr.P.C LAKKI MARWAT**

Criminal Case No.....196/2 of 2021

Date of Institution.....05-08-2021

Date of Decision.....24-05-2022

The State through Shahida Gul Principal Government Girls High School Dalo Khel Lakki Marwat.....(Complainant)

**VERSUS**

1- Hidayat Ullah s/o Dost Muhammad; and

2- Mst. Fozia Bibi wife of Hidayat Ullah r/o Dalo Khel District Lakki Marwat. ....(Accused)

FIR No. 664 Dt; 20-10-2020 U/S 506/186/189/34 PPC, P.S Lakki, Lakki Marwat.

Counsel for accused: Mr. Ghazi Mar Jan Advocate.

SPP for State: Mr. Zafar Ullah Khan.

Counsel for Complainant: Mr. Younas Ali Khan Advocate

**JUDGMENT.**

24-05-2022

Brief but relevant facts of the case as narrated in the FIR are that complainant is posted at GGHS Dalo Khel as Principle since three years.


That Chowkidar/accused Hidayat Ullah was found absent from his duty since three years, as a result of his negligence and non performance of duties two electricity boards were broken, while two computers along with one electricity regulator (stabilizer) were found missing from computer lab and in this respect complainant sent several written

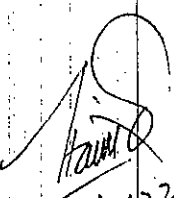
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24/05/22  
LAKKI MARWAT

**ATTESTED**  
*[Signature]*  
Magistrate  
District & Sessions Judge

complaints to District Education Officer (Female) Lakki Marwat, DEO Lakki Marwat and Deputy Commissioner Lakki Marwat for information and for arrangement of school security, upon which two inquiries were initiated but due to non interest no legal action was taken place against him/accused. That due to the aforementioned reasons, *chowkidar*/accused Hidayat Ullah forcibly closed the school and restrained the school teachers and the students from entering into the school. He also restrained one Naib Qasid namely Ghani Shah and sweeper Mairaj Bibi from entering into the school premises and also criminally intimidated them. That the wife of accused Mst. Fozia Bibi (co-accused) forcibly entered into the office of complainant and harassed her along with other teachers of the school by giving threats for dire consequences and forced me to sign a statement (already written) in order to shift burden/responsibility from the shoulders of her husband but she refused to sign the same, which is available on file. The accused and his wife (co-accused) due to her report forwarded to the concerned office, forbidden the complainant from coming to the school and threatened her for dire consequences. In this regard complainant approached to the District Police Officer Lakki Marwat via her written application for necessary action and for registration of the case against accused and for provision of one lady constable along with one male constable for the security of the school. Hence, the instant FIR.

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District Session Judge  
Lakki Marwat

  
24/5/22

The trial commenced after final report/challan submitted in the Court. Accused were summoned who appeared and after providing copies as required under the law, formal charge for the alleged offence was framed on 18-10-2021 against both the accused, wherein they pleaded not guilty to the charge and claimed trial and thereafter prosecution was allowed to lead its evidence against the accused, who examined seven witnesses with the following resume.:

Shahida Gul (complainant) appeared and recorded her statement as PW-1, she reported the matter to the local police and charged the accused for the commission of offence. She also pointed out the spot to the police who prepared site plan on her pointation. Her statement was recorded by the IO u/s 161 Cr PC. She charged the accused for the commission of offence.

Mst. Samina Bibi Qaria appeared and recorded her statement as PW-2, she supported the version of the complainant. Her statement was recorded by the IO under Section 161 Cr.P.C.

Mst. Bibi Tahira SET appeared and recorded her statement as PW-3, she also supported the version of the complainant. She was examined by the IO under Section 161 Cr.P.C.

Besides, Mr. Ghazni Shah Naib Qasid and Mst. Mairaj Bibi appeared and recorded their statements as PW-4 and PW-5, who stated that accused facing trial forbid them from coming to school and

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Examiner to  
District & Session Judge  
Lahore

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State Vs Hidayat Ullah and one other....Case#196/2 Of 2021. Page 4 of 8  
(Judgment)

performing of their duties and also threatened them for dire consequences. They were examined by the IO under Section 161 Cr.P.C.

Mr. Malik Ismail Khan IHC (IO) appeared as (PW-6), who conducted investigation in the instant case. He conducted house search, search memo is Ex.PW 6/1, submitted applications for physical remand of accused Hidayat Ullah (Ex.PW 6/2), prepared site plan (Ex.PW 6/3), again submitted application for judicial remand (Ex.PW 6/4), issued card of arrest of accused Mst. Fozia Bibi (Ex.PW 6/5), drafted application for issuance of letters for departmental inquiry against the accused (Ex.PW 6/6).

Mr. Syed Ayaz Khan the then SHO appeared as (PW-7), who chalked out the FIR in the instant case on the basis of application marked by the District Police Officer, Lakki Marwat. He arrested the accused Hidayat Ullah and issued his card of arrest (Ex.PW 7/1), submitted interim Challan (Ex.PW 7/2) and after completion of investigation he also submitted complete challan (Ex.PW 7/3).

The learned SPP for the State, counsel for the complainant abandoned the remaining PWs being the witnesses of the same set of facts, which already deposed by other PWs and closed the prosecution evidence.

The statements of both the accused were recorded U/Sec: 342 Cr.P.C, wherein neither they wished to produce evidence in their defense nor they wished to be examined on oath U/Sec: 340 (2) Cr.P.C.

ATTORNEY

Examiner

Arguments of the learned SPP for the State and learned counsel for complainant and the accused have been heard while the record has been perused in the light of arguments.

According to the complainant, that accused forcibly closed the school and restrained the teachers and students from entering into the school. That accused also criminally intimidated the Naib Qasid and sweeper namely Mr. Ghani Shah and Mst. Mairaj Bibi for dire consequences. That upon her application dated 13-10-2020, instant FIR was lodged, however the contents of FIR are silent regarding specific time, date and place of occurrence and the word "time to time" has been mentioned in the column of date of occurrence of the FIR, which fact also admitted by the complainant (PW-1) during her cross examination, which creates serious doubts regarding the version of the complainant. The narrated story in the FIR also suggests that upon theft of articles from computer lab why only departmental action taken and criminal case i.e FIR has not been lodged against the accused before the instant FIR. PW-1 (complainant) during her cross examination stated that IO came to the spot for its inspection on the following day, which means that on the day of occurrence i.e. on 13-10-2020. This statement of PW-1 was contradicted by Investigation Officer (PW-6) by stating that on 20-10-2020 after registration and handing over the copy of FIR, he visited the place of occurrence.

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Examiner to  
District & Session Judge  
Lakki Mawana

Mr. Ghani Shah Naib Qasid appeared and recorded his statement as PW-4, who simply supported the version of the complainant in his examination in chief and stated that his statement was recorded by the IO, however during his cross examination he deposed that exact date of occurrence is not known to him. He contradicted his statement that IO has not recorded his statement and the same contradictory statement also given by the PW-5 by negating her version of recording of statement by IO in her cross examination.

PW-4 and PW-5 both during their cross examination stated that they were not present at the time of preparation of site plan. This statement of PWs was contradicted by Investigation Officer (PW-7) during his cross examination by stating that on the spot all the PWs including school staff were present on the spot.

Investigation Officer has not recorded statement of any independent witness about the occurrence, which fact he also admitted in his cross examination. There are material contradiction in the statements of the PWs with regard to the presence of the PWs on the spot, time date and place of the occurrence and the role assigned to the accused for commission of the offence. There is no confession on the part of accused. No previous conviction of accused in such activities exists on record to link them with the commission of offence. Moreover, the departmental inquiry and its findings not attached to the case file to corroborates the contents of FIR. EDO, who according to the

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Date: 24/05/22



complainant was present on the spot has not been examined though he was the most responsible officer and relevant witness. Similarly, students from the school have not been examined in support of prosecution story.

It is the settled principle of law that for giving benefits of doubt, it is not necessary that there should be many circumstances creating doubt-----If there is a circumstance which creates reasonable doubt in the prudent mind about the guilt of the accused, then they would be entitled to its benefit not as a matter of grace or concession but as of right. **Reliance is placed on case laws "Muhammad Akram Vs The State (2009 SCMR 230) & "Tariq Pervez versus The State" (1995 SCMR 1345).**

In view of above discussions, it is crystal clear that the case of the prosecution is full of doubts and the statements of the complainant and eyewitnesses are contradictory, which create serious doubts about the mode and manner of the occurrence and veracity of the testimony furnished by the complainant as well as other eyewitnesses.

For what has been discussed above, it is held that the prosecution has failed to establish its case against the accused facing trial beyond any reasonable shadow of doubts, and admittedly benefits of doubt in such cases must be extended to accused. Hence, by extending the benefits of doubt to the accused facing trial, they are hereby acquitted from the

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charges levelled against them. Accused are on bail, their bail bonds stand cancelled and sureties are discharged of their liabilities.

Copy of this judgment be placed on the police file.


File be consigned to the district record room after necessary completion and compilation.

**ANNOUNCED:**  
24-05-2022


  
**HAMID KAMAL**  
SCJ(J)/Judl: Magistrate Sec:30 Cr.P.C  
Lakki Marwat

**CERTIFICATE:**

It is certified that this judgment of mine consist of (08) pages and has been read over, signed by me after necessary correction.

  
**HAMID KAMAL**  
SCJ(J)/Judl: Magistrate Sec:30 Cr.P.C  
Lakki Marwat

C.O No. 3476  
Application received on 15.6.22  
Copying Fee deposited on 15.6.22  
Judgment received for copying 15.6.22  
No. of words 6 sheets  
Copying Fee 1  
See U.C. No  
Date 15.6.22  
Copy 15.6.22

**ATTESTED**  
  
Signature to  
Magistrate & Session Judge  
Lakki Marwat

**Judgment Sheet**  
**Secretariat of KP Ombudsperson**  
**For Protection against Harassment of Women at the Workplace**  
 Complaint No.1-55/2020

Ms. Shahida Gul.....Vs.....Mr. Hidayat Ullah and others

**J U D G M E N T**

Date of Hearing:	25.03.2022
Complainant by:	In person
Respondents by:	Never ever appeared

**Rukhshanda Naz, Ombudsperson:** The captioned complaint was lodged under the Protection against Harassment of Women at the Workplace, 2010 by the complainant namely Ms. Shahida Gul, along with 13 other complainants all Teachers of Girls High School Dalukhel District Lakki Marwat against the respondents Hidayat Ullah, School Watchman and Mst. Fouzia, wife of the watchman for Harassment of these school teachers.

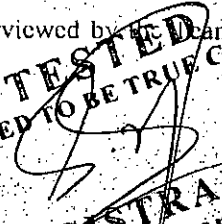
**INQUIRY REPORT IN THE ABOVE TITLED CASE :**

On the failure of the local Police Station, Dallo Khel Lakki Marwat to produce the accused Mr. Hidayat Ullah and others. The accused deliberately avoiding to appear before the Ombudsperson and submission of the written defense. In the above titled case, the KP Ombudsperson's office issued directions for the constitution of Facts Finding Committee/Team vide Order Sheet dated 07.09.2021 to visit Lakki Marwat to conduct facts finding inquiry in the case. Accordingly, a Committee/Investigation Team comprising of Deputy Director (Investigation) & Assistant Director (Investigation) was constituted to make a visit on 30.11.2021 and probe the matter.

**PROCEEDINGS OF THE INQUIRY TEAM:**

The Ombudsperson's Investigation Team reached GGHS School Dallo Khel Lakki Marwat. However, the school was found closed due to the shifting of the same to GGPS Dallo Khel Lakki Marwat. Therefore, the Team visited the said School. The statements made part of the judgment with the same language to illustrate a mindset against working women and a hostile working environment at the workplace.

The Principal, Staff & Students were interviewed by the Team details of which are as under:-

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 Khyber Pakhtunkhwa

1. STATEMENT OF SHAHIDA GUL (COMPLAINANT):

She posted since 2017 in the said School as Principal. The accused was working in GGIS No.4 as punishment by the DEO (Female). Later on, he was transferred to GGHS Dallo Khel. On his transfer to GGHS Dallo Khel, his attitude towards the Principal, staff members & students remained derogatory and threatening, being the owner of the School property. He never performed his duties, rather he stopped the Principal from performing her duties and started damaging assets of the School. An FIR against him was lodged for stealing 02 No. of Computers and a UPS from the School in which he was found guilty upon investigation. Besides, he along with her wife namely Ms. Fozia Bibi was habitual for using immoral and abusive language i.e

"رنڈیاں کنجریاں خود چوری کر کے مجھ پر الزام لگاتی ہیں"

In 2019, besides verbal harassment, the wife and aunt namely Fozia Begum & Gul Bano of the Chowkidar, attacked her wherein she got badly injured. The complainant reported the situation to Director Elementary & Secondary KP, Deputy Commissioner, DPO, DEO (Female) but all in vain. STATEMENT OF MS. KALSOOM AKHTAR Headmistress GPS.No.1 Dallo Khel:-

Ms. Kalsoom Akhtar states, at the teaching/non-teaching staff of GGHS Dallo Khel and GGPS Dallo Khel were ordered to exchange School Building with each other temporarily. However, when the staff of GGPS Dallo Khel tried to enter the School Building of GGHS Dallo Khel, the said Chowkidar namely Hidayatullah refrained them to enter the School Building.

2. STATEMENT OF Ms. RAHILA TARIQ CT TEACHER:-

Ms. Rahila Tariq stated in her statement that the wife of the accused always used abusive language even she attacked Ms. Shahida Gul Principal due to which she received injuries. She always used to threaten the Principal for signing illegal documents. She further stated that the accused sent messages to the families of the complainants that if teachers came again to school, he will pick off their scarfs (برقعہ). The accused and his wife made hostages the teachers and students till 3:30 for the purpose to get a sign on illegal documents from Incharge.

Besides above, she provided additional information, the gist of which are reproduced as under:-

"چوکیدار کا دوست صبح سکول آنے والے وقت میں تمام اساتذہ کی ویڈیو بنانا تھا. صبح کے وقت تمام ٹیچر اور طالبات برقعوں میں بیٹھی میڈم کے آنے کا انتظار کرتی اور ان کے آنے تک چوکیدار طالبات کو ماؤں بہنوں والی گالیاں دیتا تھا. ان سے کہتا کہ تمہاری ماؤں کے کپڑے اتار کر ان کے ساتھ غلط کام کرونگا اور باقی غلط الفاظ استعمال کرتا تھا.

میڈم شایدہ گل کو گھر پہ بیٹھا کر ان کی بھابھی مس پرویز سے پوچھتی کہ وہ "رنڈی" کیسی ہے"

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اسکے بعد وہ میٹم کے بارے میں کہتا کہ یہ اب شوہر مانگ رہی ہے۔  
Furthermore, on the intervention of the Assistant Commissioner concerned,  
the accused threatened all the staff with the following remarks:-

34

"کہ یہ تو اسسٹنٹ کمشنر ہے اگر خدا بھی نیچے آیا تو پھر بھی آپ کی  
حالت ہوگی۔ چوکیدار کو پولیس لے گئی۔ عدالت میں کیس چل رہا  
ہے"

### 3. STATEMENT OF MS. MUSHINA QARIA TEACHER:-

She has been working since 2012 in the school and her statement is reproduced as under:-

"چوکیدار کہنی آفس کے تالے میں گنڈا گھسا دیتا تھا تاکہ تالا نہ کھو  
ٹینشن ہو اور کہنی رجسٹر کی ٹوکری میں کنڈم رکھ دیتا کہ ٹیچر  
شرمندہ ہوں۔"

She further stated that the accused sent messages to the families of the complainants that if teachers came again to school, he will pick off their scarfs (برقعہ). (Statement of the Teacher is at Annex-IV)

### 4. STATEMENT OF Ms. SAMINA ANJUM SST (General):-

Ms. Samina Anjum stated that the Chowkidar used to ask her to come to Gate from time to time in order to haunt her and was also asking for her signature on unnecessary/irrelevant documents. The accused and his wife kept her hostage for not signing the unnecessary/relevant documents.

### 5. STATEMENT OF Ms. MIRAJ BIBI Class-IV:-

The gist of statement of the Class-IV is reproduced as under:-

"کہ ہدایت اللہ کی بیوی مسماء فوزیہ بی بی عرصہ دراز سے ہمیں تنگ کرتی  
آ رہی ہے سکول کے اندر ہمیں بہت ہی قبیح اور ننگی گالیاں دیتی تھی اور ہمیں  
بے جا تنگ کرتی تھی۔"

ہم نے علاقہ کے مشران کو شکایت کی تھی لیکن مسئلہ حل نہ ہوا۔ علاقہ کے  
مشران نے ہمیں منع کیا کہ فوزیہ کے ساتھ بحث نہ کرو کیونکہ اس سے بڑا  
مسئلہ پیدا ہوگا۔

ہدایت اللہ کی بیوی فوزیہ سکول میں آکر ہمیں کہتی کہ آپ لوگوں کو شوہروں  
کی ضرورت ہے تاکہ آپ کو تھنڈا کرے وغیرہ وغیرہ

### 6. STATEMENT OF Ms. SYED GHANI SHAH Class-IV:-

Ms. Syed Ghani Shah stated that the Hidayatullah Chowkidar (accused) intimidated the Principal and staff to appoint his wife in the said School.

### 7. STATEMENT OF URWAT-UL-USKA Student of Class-7<sup>th</sup>:-

The gist of statement of the student is re-produced as under:-

"جب میں اور باقی بچیاں سکول آتے تھے تو سکول کی کلاسز میں تالا کھولنے کے بعد  
Bra اور underwear پڑے ہوتے تھے۔ سکول میں ہدایت اللہ موجود ہوتا تھا۔"

اس وقت سکول میں سب بچوں کے سامنے ہدایت اللہ کی بیوی فوزیہ بی بی نے میٹم کے  
ساتھ ساتھ ہی کی اور گالم گلوچ بھی ہوئی جس کے بعد میٹم کو چوٹ بھی آئی۔ کلاس  
میں ہر روز کچھ نہ کچھ گندے انشوریر، برا اور کنڈم پڑے ملتے تھے۔

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8. STATEMENT OF LAIBA, MINHAS & KHANA Students of Class-10<sup>th</sup>:-

The gist of statement of the students are reproduced as under:-

سکول بچیاں جب بھی صبح سویرے سکول آتی گاڑی کی وجہ سے تو ہدایت اللہ بچیوں کو گلاباں دیتا اور ان کے والدین کے پیچھے گلابیاں نکالتا کہ کیوں صبح سویرے آتی ہو اور کیوں یہاں پڑھنے آتی ہوں۔

کہ ماں کو گالی یعنی تمہاری ماں کے کپڑے نکال کر تمہاری ماں کو راستے میں ننگا کر کے گھسیٹوں گا۔

In addition to above, the wife of the accused always shown knife to students on closing to left my School quickly.

9. STATEMENT OF LAIBA AMEEN Student of Class-9<sup>th</sup>:-

The wife of the accused always snatched my food items which I used to bring for the class fellows. She snatched and kept my bag for days and threatened me to leave.

She further stated that:

"ہدایت اللہ چوکیدار جو بچیاں صبح جلدی آتی تھی ابا خیل سے ان کو یہ کہا جاتا تھا کہ آپ سکول اس لیے جلدی آتی ہیں تاکہ یہ لوگ یہاں سے کسی کے ساتھ بھاگ جائیں۔

سکول کی مختلف کلاسز کی بچیوں کے ساتھ یہ سب سلوک ہو چکا ہے جس کے متعلق پورا سکول جانتا ہے۔"

10. STATEMENT OF ZARSHADA BIBI, ZARIN TAJ & FARHAT MEMBERS PARENT TEACHER COUNCIL:-

زرشادہ بی بی۔ سکول کو اسی جگہ ہونا چاہیے۔

زرین تاج بی بی۔ سکول سے واپسی پر بچیاں چوکیدار اور فوزیہ بی بی کے تاروا سکول کو بیان کرتی تھیں۔ برائے مہربانی آپ اس مسئلے کو حل کریں کیونکہ اس مسئلے کو حل کریں کیونکہ اساتذہ اپنا ٹرانسفر کروالیں گی لیکن ہمارے بچوں کا مستقبل تاریک ہو جائے گا کیونکہ ہم غریب لوگ اپنے بچوں کے مستقبل کے لیے فکرمند ہیں۔

11. STATEMENT OF MR. NADAR KHAN UNCLE OF THE ACCUSED:-

The statement clearly stipulates that the accused always used abusive language having bad character, uncivilized, and a thief.

"ہاں بالکل بدتہذیب اور چور بندہ ہے۔ میں سب کاموں سے واقف ہوں کبھی سکول کے پرنسپل، کبھی سٹاف اور دیگر طلباء سے بدزبانی کرتا تھا۔ پرنسپل نے ہر ایک مطلع کیا تھا۔ ہر فورم پر فریاد کیا ہے لیکن انکی شنوائی نہیں ہوتی۔ انتظامیہ کے علم میں بھی لایا گیا تھا لیکن کسی نے بھی غور نہیں کیا۔"

KEY FINDINGS OF THE OMBUDSPERSON/ FINDINGS OF THE INVESTIGATION REPORT:

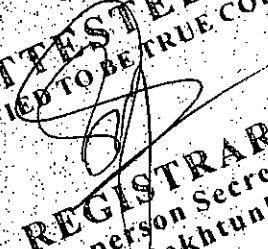
1. Mr. Hidayatullah Chowkidar had provided Land to the Government for the construction of GGHS School Dallo Khel Lakki Marwat.

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Khyber Pakhtunkhwa

completion of construction of the School, he was appointed as Chowkidar in the said School in lieu of Land. However being an owner of the Land, he along with family members including his wife started harassing the Staff & Student in one way or another as evident from the above statements. Besides, the complainants time and again filed complaints with the authorities such as Deputy Commissioner, Director Elementary & Secondary Education Khyber Pakhtunkhwa, District Education Officer Lakki Marwat & District Police Officer for arrangements of security but in vain. *In addition, an FIR No 664 Dated 20/10/20 was also lodged in the Police Station Lakki Marwat. However, as per the statement of the SHO of the said Police Station, the accused was not arrested due to shifting to an unknown place whereas during the investigation, the accused was present in his residence and despite calling him by the Investigation Team, he refused with the remarks that he can't attend the investigation for being ill.*

It is pertinent to mention that in the light of the judgment of the Supreme Court of Pakistan Islamabad, the Government had imposed a ban on appointment against in lieu of Land from time to time. Reference has taken from SCMR 1997 Page 855.

2. It is proved from the statements of complainants that the accused not only Harassed them *but also placed undergarments and condoms in the Class Rooms on the Desks of the students and in the staff room. The accused along with family members also used abusive language for the staff, students, and family of the students of the said School and also attacked the Principal where she got injured.*
3. During the investigation, it was revealed by the complainants that the accused was previously terminated because of similar behavior with Ex-Principal. However, on inquiring about the termination and reinstatement order of the accused, it was informed by the complainants that all the record is in the custody of the Ex-Principal GGHS Dallo Khel Lakki Marwat.

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**REGISTRAR**  
 Ombudsperson Secretariat  
 Khyber Pakhtunkhwa

RECOMMENDATIONS:

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1. Mr. Hidayatullah Chowkidar, GGHS Dallo Khel, Lakki Marwat may be removed from service under the Protection against Harassment of Women at Workplace as allegations against him have been proved.
2. The accused may also be banned from the entrance into the premises of the School otherwise the staff & students shall face untoward incidents and dire consequences.
3. Despite repeated complaints lodged against the accused, the Elementary & Secondary Education Department Khyber Pakhtunkhwa, Directorate of F.&SE Khyber Pakhtunkhwa & District Education Office concerned took no appropriate action against the accused in time, which encouraged the accused to continue his illegal and unlawful activities.
4. It is a set procedure that the District Administration of the concerned District is responsible for the maintenance of peace and security of the community. However, it is found that besides complaints lodged with Deputy Commissioner Lakki Marwat, neither action has been taken against the accused nor security has been provided by the District Administration to the complainants.
5. It is evident from the record that an FIR was lodged against Mr. Hidayatullah Chowkidar (accused) and the worthy Ombudsperson Khyber Pakhtunkhwa time and again ordered for physically producing the accused but the DPO Lakki Marwat reported that the SHO concerned searched the accused everywhere in Dallo Khel but they were not found there. However, during the investigation, it has been found that the accused was at his home but he did not turn up before the Investigation Team for investigation. Hence, the statements of SHO concerned are baseless.

In case, the Government intends to shift the Principal, Staff & Students to their original building of GGHS Dallo Khel Lakki Marwat, security measures may be ensured to be provided to the Principal, Staff & Students, please.

Based on the hearings, in-depth inquiry, and official record placed on file revealed that the accused Hidayatullah and his wife Ms. Fozia are taking advantage of the land donated to the government land they are harassing the teachers and girls students. The entire situation illustrates that the accused knowingly used physical conduct of a sexual nature or sexually demeaning attitude to force women & girls to vacate the building. According to Pakistan Economic Survey 2020-21, the Lakki Marwat literacy rate is 29.07%. In districts education profiling Lakki Marwat is on the 89, which shows a low literacy rate. Grave allegations of harassment as alleged by the complainants were found to be true in the case, the complaint in hand falls under the ambit of the definition under Section-2(h) of Protection against Harassment of Women Act, 2010, a series of offensive incidents reported in the inquiry report are related to "sexually demeaning attitudes, causing

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interference with work performance or creating an intimidating, hostile or offensive work environment".

Under section 4 (d) the accused Mr. Hidayatullah and Ms. Fozia be dismissed from service. The Secretary Education, the Elementary & Secondary Education Department Khyber Pakhtunkhwa, Directorate of E&SE Khyber Pakhtunkhwa & District Education Office are directed to execute the instant judgment in letter and spirit in order to ensure a safer working environment for teachers and girls students to feel secure in the school. The accused Mr. Hidayatullah and Ms. Fozia also be removed from the premises otherwise they will continue interference in the affairs of school.

For the reasons stated supra, the titled complaint is disposed-of.

**ANNOUNCED:**

25.03.2022



Ombudsperson KP

Protection against Harassment of Women at the Workplace, 2010  
(Khyber Pakhtunkhwa)

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Khyber Pakhtunkhwa



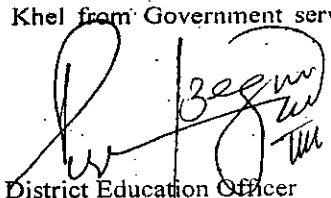
OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) LAKKI MARWAT

Ph & Fax: (0969) 538080, Email: deoflakki@gmail.com

3.9

OFFICE ORDER:-

In compliance to the judgment announced by the Secretariat of Khyber Pakhtunkhwa Ombudsperson for protection against harassment of women at the work place in compliant No.1-55/2020 Ms. Shahida Gul VS Mr. Hidayat Ullah and others dated: 25-03-2022 communicated by Director Elementary & Secondary Education Khyber Pakhtunkhwa vide letter No. 3303/File:192/Ombud:/P.F Shahida Gul/Lakki Marwat/2022 dated Peshawar the 13-05-2022. The District Education Officer (Female) Lakki Marwat is pleased to remove Mr. Hidayat Ullah Khan Chowkidar GGHS Dallo Khel from Government service with immediate effect.

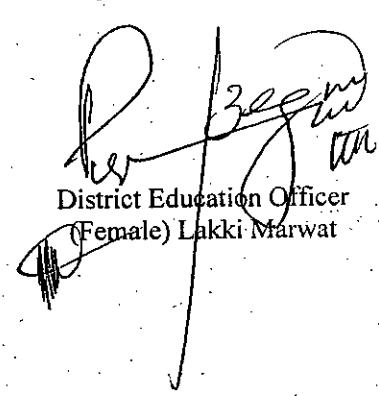
  
District Education Officer  
(Female) Lakki Marwat

Endst: No. 2906-12

Dated. 7/6/2022

Copy to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Registrar Ombudsperson Secretariat Khyber Pakhtunkhwa.
3. Deputy Commissioner Lakki Marwat.
4. Section Officer (complaint) Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
5. Principal GGHS Dallo Khel with the direction to made necessary entry in his service book.
6. District Accounts Officer Lakki Marwat.
7. Master File.

  
District Education Officer  
(Female) Lakki Marwat

گذشتہ دنوں ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ، زنانہ، لکی مروت

(40)

Annex "I"

عنوان :- درخواست دربارہ بحال کرنے کے بطور جوگندہ  
گورنمنٹ گریڈنگ اسکول دلوصل لکی مروت جو  
من سائل کو غیر قانونی طور پر بحال کر ڈیڑھ 12-2906  
مورخہ 22-06-07 کو نوٹ کر کے سے یہ خاص کیا اور  
اس سے قبل مسائل کی تنخواہ 01-01-2018 مورخہ  
سے غیر قانونی طور پر بند کیا ہے تنخواہ  
Release کرنے کی بھی اس کا مطالبہ کیا گیا ہے  
لوحات ذیل

تجاویز :- گذارنے کے ذیل ہے

1) یہ کہ من سائل گورنمنٹ گریڈنگ اسکول دلوصل لکی مروت  
سے بطور جوگندہ لکھنیا ہے

2) یہ کہ یہ سائل صاحبہ شاہدہ گل کے مسائل کی تنخواہ  
مورخہ 01-01-2018 سے غیر قانونی طور پر بند  
کیا گیا ہے اور اسے بند ہے

3) یہ کہ یہ سائل صاحبہ شاہدہ گل کے  
مسائل اور سائل کی بیوی فوزیہ بیگم کے خلاف  
ایک من گھڑت FIR نمبر 664 مورخہ 20-10-2020  
کیس نمبر 34, 189, 186, 506 سے تعلق لکی مروت درج  
کی جس کے من سائل پر یہ بیوی فوزیہ بیگم کو عدالت

RECEIVED  
Diary No. [Signature]  
06 DEC 2022  
District Education Officer  
(Female) Lalki Marwat

ڈسٹرکٹ ایجوکیشن آفیسر  
7-12-2022

فائب سینیٹر جنرل: مہاراجا گروٹ کے قتل 2021-22-02-18

کو بھارت میں ایک ایف. بی. ایف. کیلئے لیا گیا ہے

(4) ایک بار یہ مہاراجا گروٹ کے قتل کے ایک مہینے کے بعد

1-55/2020 اور بائیکاٹ کمیٹی کو ارسال کی جاسکی وہ

میں سٹیٹ لکچر 06-06-2022 کو غیر قانونی

طور پر نوٹوں سے برخواست کیا اور سٹیٹ کو

دست سے لے لیا گیا۔ اور پھر وہ لیا گیا ہے

35 ایک بار قتل کے وقت اسٹیشن پر مہاراجا

کا رفا مہاراجا کی آفس میں دوران میں

26-11-2020 کو مہاراجا کو نوٹوں کی

برفائی گائیڈ کیا گیا تھا جس سے مہاراجا

گائیڈ کے ناموں اور مہاراجا کے AC

کے آفس میں موجود تھے۔

وہ ایک مہاراجا کے گائیڈ کے ناموں اور

میں مہاراجا کے آفس میں

گائیڈ کے ناموں اور مہاراجا کے آفس میں

گائیڈ کے ناموں اور مہاراجا کے آفس میں

گائیڈ کے ناموں اور مہاراجا کے آفس میں

گائیڈ کے ناموں اور مہاراجا کے آفس میں

گائیڈ کے ناموں اور مہاراجا کے آفس میں

0318-9873185

# بعدالت

جناب سروس ٹریبونل خیبر پختونخواہ

2023ء منجانب

مورخہ اپریل 04

بنام ایڈمنسٹریٹیو ایجوکیشن کے چیک

مقدمہ سروس اپیل

دعویٰ

جرم

## باعث تحریر آنکھ

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

آن مقام پشاور کیلئے منظور اسلام ایڈووکیٹ ہائی کورٹ

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 ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سبب سے وہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔

کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

verified  
Accepted  
04/04/2023  
2023ء

المرقوم 04-04-2023 ماہ اپریل 2023ء

العبد د گ واہ العبد

کے لئے منظور ہے۔

پشاور

مقام