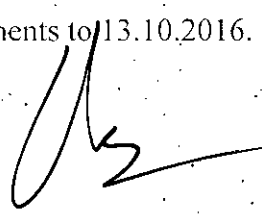


19.5.2016

Agent to counsel for the appellant and Addl. AG for respondents present. Rejoinder not submitted requested for time to file rejoinder. To come up for rejoinder/arguments to 13.10.2016.

Member

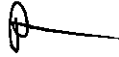


Member



13.10.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Counsel for the appellant requested for adjournment. Adjournment granted. To come up for arguments on 06.02.2017.



(ABDUL LATIF)  
MEMBER

(PIR BAKHSH SHAH)  
MEMBER



*Handwritten note:* 6/2/2017

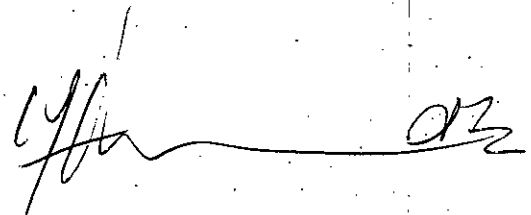
06.02.2017

Counsel for appellant and Mr. Daud Jan, Superintendent alongwith Mr. Muhammad Adeel Butt; Additional Advocate General for respondents present. Learned counsel for the appellant submitted reinstatement order of the appellant and requested for withdrawal of the instant appeal. Request accepted. Signature of learned counsel for the appellant also recorded at the margin of order sheet as a token of proof. The appeal in hand is hereby dismissed as withdrawn. No order as to costs. File be consigned to the record room.

ANNOUNCED  
06.02.2017



(ASHFAQUE TAJ)  
MEMBER



(MUHAMMAD AAMIR NAZIR)  
MEMBER

25.08.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Senior Clerk at GHSS Jamrud, Khyber Agency when subjected to inquiry on the allegations of corruption and vide impugned order dated 31.3.2015 major penalty in the shape of reduction in scale from the post of Senior Clerk to that of Junior Clerk was awarded where-after he preferred departmental appeal on 15.4.2015 which was not responded and hence the instant service appeal on 28.7.2015.

That no regular inquiry was conducted and appellant was condemned unheard.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 12.11.2015 before S.B.

Appellant Deposited  
Security & Process Fee

  
Chairman

12.11.2015

Agent of counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Addl: A.G for respondents present. Requested for adjournment. To come up for written reply/comments on 9.2.2016 before S.B.

  
Chairman

09.02.2016




Counsel for the appellant and Mr. Daud Jan, Supdt. alongwith Addl: A.G for respondents present. Para-wise comments submitted. The appeal is assigned to D.B for rejoinder and final hearing for 19.5.2016.

  
Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No. 871/2015


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	03.08.2015	<p>The appeal of Mr. Arab Khan resubmitted today by Mr. Noor Muhammad Khattak Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	10-8-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>11-08-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3	11.08.2015	<p>Agent of counsel for the appellant present. Counsel for the appellant is stated indisposed. Adjourned to 25.8.2015 for preliminary hearing before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mr. Arab Khan Ex-Senior Clerk GHSS Jamrud Khyber Agency received to-day i.e. on 28.07.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal may be page marked according to the index.
- 2- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.
- 3- Copies of appointment and selection grade orders are illegible which may be replaced by legible/better one.

No. 1114 /S.T,

Dt. 28/7 /2015

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Noor Muhammad Khattak Adv. Pesh.

*Note:*

*Sir,*  
*All objections have been removed,*  
*hence re-submitted today dated 3.8.2015.*

*17*

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

APPEAL NO. 871 /2015

Arab Khan

VS

Education Deptt:

**INDEX**

<b>S.NO.</b>	<b>DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
1.	Memo of appeal	.....	1- 4.
2.	Appointment order	<b>A</b>	5.
4.	Selection grade	<b>B</b>	6.
5.	Move over	<b>C</b>	7.
6.	Promotion order	<b>D</b>	8.
7.	Charge Sheet	<b>E</b>	9.
8.	Reply	<b>F</b>	10.
9.	Affidavit	<b>G</b>	11.
10.	Impugned order	<b>H</b>	12.
11.	Departmental appeal	<b>I</b>	13- 15.
12.	Vakalat nama	.....	16.

**APPELLANT**

THROUGH:

  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**

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

APPEAL NO. 871 /2015

**S.W.P Province**  
**Service Tribunal**

Diary No 887

Date 28/7/2015

Mr. Arab Khan, Ex-Senior Clerk (BPS-09),  
GHSS Jamrud, Khyber Agency.....**APPELLANT**

**VERSUS**

- 1- The Director FATA (E&SE) Department, Warsak Road,  
Khyber Pakhtunkhwa, Peshawar.
- 2- The Agency Education Officer, Khyber Agency at Jamrud.

.....**RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER**  
**PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974**  
**AGAINST THE IMPUGNED ORDER DATED 31.3.2015**  
**COMMUNICATED TO THE APPELLANT ON 13.4.2015**  
**WHEREBY MAJOR PENALTY OF REDUCTION TO**  
**LOWER POST OF JUNIOR CLERK FROM THE POST OF**  
**SENIOR CLERK WAS IMPOSED ON THE APPELLANT**  
**IN VIOLATION OF LAW AND WITHOUT CONDUCTING**  
**REGULAR INQUIRY IN THE MATTER AND AGAINST**  
**NOT TAKING ACTION ON THE DEPARTMENTAL**  
**APPEAL OF THE APPELLANT WITHIN THE STATUTORY**  
**PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned order dated 31.3.2015 may very kindly be set aside and the respondents may be directed to re-instate the appellant on his original post of senior clerk with all consequential benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant was appointed as junior clerk in respondent Department on regular basis and on the proper recommendations of Departmental Selection Committee vide order dated 10.5.1987. That in response to the said order the appellant submitted his arrival report on the very next day and started performing his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure ..... **A.**

re-submitted to-day  
and filed.

*Abu*  
Registrar  
3/8/15

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

APPEAL NO. 871 /2015

K.P. Province  
Service Tribunal

Diary No. 887

Dated 28/7/2015

Mr. Arab Khan, Ex-Senior Clerk (BPS-09),  
GHSS Jamrud, Khyber Agency.....**APPELLANT**

**VERSUS**

- 1- The Director FATA (E&SE) Department, Warsak Road, Khyber Pakhtunkhwa, Peshawar.
  - 2- The Agency Education Officer, Khyber Agency at Jamrud.
- .....**RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 31.3.2015 COMMUNICATED TO THE APPELLANT ON 13.4.2015 WHEREBY MAJOR PENALTY OF REDUCTION TO LOWER POST OF JUNIOR CLERK FROM THE POST OF SENIOR CLERK WAS IMPOSED ON THE APPELLANT IN VIOLATION OF LAW AND WITHOUT CONDUCTING REGULAR INQUIRY IN THE MATTER AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

That on acceptance of this appeal the impugned order dated 31.3.2015 may very kindly be set aside and the respondents may be directed to re-instate the appellant on his original post of senior clerk with all consequential benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

- 1- That appellant was appointed as junior clerk in respondent Department on regular basis and on the proper recommendations of Departmental Selection Committee vide order dated 10.5.1987. That in response to the said order the appellant submitted his arrival report on the very next day and started performing his duty quite efficiently and up to the entire satisfaction of his superiors. Copy of the appointment order is attached as annexure ..... **A.**

re-submitted to-day  
and filed.

Oben  
Registrar

3/8/15



- 2- That during the course of his service the appellant was allowed selection grade (BPS-7) vide notification dated 5.8.1998. That later on vide notification dated 8.7.2003 the appellant was allowed move over to BPS-9 on account of reaching his salary to maximum of BPS-8. Copies of the orders are attached as annexure ..... **B and C.**
- 3- That appellant being senior most amongst his colleagues was promoted to the post of Senior Clerk (BPS-9) on regular basis and on the proper recommendation of Departmental Promotion Committee vide Notification dated 29.4.2010. Copy of the promotion order is attached as annexure ..... **D.**
- 4- That appellant while serving the respondent Department at Government Higher Secondary School Jamrud Khyber Agency was served with charge sheet on the wrong and baseless allegation of involvement in corruption (Bribery) while he was posted at Agency Education Office Khyber in February 2014 received Rs.65000/- from the widow and son late Muhammad Irshad PTC on account of preparing Financial Assistance, group Insurance etc. Copy of the Charge sheet is attached as annexure ..... **E.**
- 5- That in response to the Charge Sheet appellant replied in detailed along with proof and denied the allegation which has been leveled against the appellant. That the appellant also provided the affidavit of the complainant party to the enquiry officer in which the complainant party clearly admitted and stated that the complaint/allegation was made by them under the pressure of Agency Education Officer Khyber Agency. Copy of the reply and affidavit is attached as annexure ..... **F & G.**
- 6- That the respondent No.2 without conducting fact finding inquiry and without conducting regular Departmental inquiry straight away issued the impugned order dated 31.3.2015 whereby the penalty of reduction in lower scale was imposed on the appellant. Copy of the impugned order is attached as annexure ..... **H.**
- 7- That feeling aggrieved from the impugned order dated 31.3.2015 appellant filed Departmental appeal but no reply has been received so far. Hence the present appeal on the following grounds amongst others. Copy of the Departmental appeal is attached as annexure ..... **I.**

**GROUND:**

- A- That the impugned order dated 31.3.2015 issued by the respondent No.2 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the respondent No.2 acted in arbitrary and malafide manner by issuing the impugned order dated 31.3.2015.
- D- That no statement of allegation has been served on the appellant by the respondent No.2 before issuing the impugned order dated 31.3.2015.
- E- That no show cause notice has been served on the appellant before issuing the impugned order dated 31.3.2015.
- F- That no chance of personal hearing/ defense has been given to the appellant before issuing the impugned order dated 31.3.2015.
- G- That no regular Departmental nor fact finding inquiries were conducted by the concerned authority before issuing the impugned order dated 31.3.2015 against the appellant which is as per Supreme Court Judgments is necessary in punitive actions against the civil servant.
- H- That the appellant inspite of providing the affidavit of the complainant party in which the complainant party admitted and stated that the complaint/allegation was made by them under the pressure of respondent No.2, the respondent No.2 by himself conducted the so called one sided inquiry and issued the impugned order dated 31.3.2015 against the appellant.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 24.7.2015

**APPELLANT**

*Arab Khan*  
**ARAB KHAN**

**THROUGH:**

*Noor Mohammad Khattak*  
**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

**DIRECTORATE OF EDUCATION (FATA) N.W.F.P. PESHAWAR****APPOINTMENT:**

The following approved candidates are hereby appointed temporary as junior clerk on Rs.520/- pm each in BPS-5 plus usual allowances are admissible under the rules w.e.f. the dates of their taking over charge in the school noted against their named.

S. No.	Name of candidate	Posted at	Remarks
1.	M. Dawood s/o Abdur Rauf, Matric	GPS Angori	Against vacant p
7.	Arab Khan s/o Akhtar Khan	GHS Kambar Khel Atari (Khyber)	---do--
9.	Saleem Khan s/o Abdul Hanan	GHS Sardi Khel (FR Bannu)	---do--

**Note:-**

1. Charge reports should be submitted in duplicate to all concerned.
2. The appointment of the candidates are being made purely on temporary basis are liable to termination at any time without notice and with out assigning any reason. In case they wants to resign their post at any time, they shall to give one month prior notice or forefeet one month pay in lieu thereof. That services will be terminated if they are not to select.
3. Their original Educational Qualification date of birth and domicile certificates should be checked before handed over charge of the post and attested copies thereof he kept on record of the school/office.
4. TA/DA etc. is not allowed on first appointment.

Dy: Director of Education  
(FATA) N.W.F.P. Peshawar

**ATTESTED**



A-5

DIRECTORATE OF EDUCATION (PATA) N.W.F.P. PESHAWAR.

APPOINTMENT.

The following approved candidates are hereby appointed temporarily as Junior Clerk on Rs. 520/- pm each in EPS-5 plus usual allowances are admissible under the rules w.e.f. the dates of their taking overcharge in the school noted against their names.

SNo.	Name of candidates.	Posted at.	Remarks.
1.	Muhammad Dawood s/o Abdur Rauf, Matric.	G.S. Angul (Kurram Agency)	against then newly created post.
2.	Mohammed Hamayun s/o Muhammad Yunas (Matric)	GHS, Burki (Kurram)	.....do.....
3.	Aitaf Hussain s/o Fayaz Hussain.	GHS, Ghilja (Orakzai)	.....do.....
4.	Sardar Khan s/o Abdul Ghaffar Khan	GHS, Shinkai (SWA)	.....do.....
5.	Alaf Shah s/o Noor Shah	GHS, Saif-ul-Darra (Orakzai Agency)	.....do.....
6.	Fidaullah s/o Fazle Ilahi (Matric/C. Com)	Chagmalai (SWA)	.....do.....
7.	Arsh Khan s/o Akhtar Khan.	GHS, Komar Khel Atari (Khyber)	.....do.....
8.	Aman Gul s/o Gul Rehman (Matric)	GHS, Sandu Khel (Mohmand Agency)	.....do.....
9.	Saleem Khan s/o Abdul Hanan (Matric)	GHS, Sardi Khel (FR Pannu).	.....do.....

Notes:-

1. Charge reports should be submitted in duplicate to all concerned.

2. The appointment of the candidates are being made purely on temporary basis are liable to termination at any time without notice and with out assigning any reason. In case they wish to resign their post at time, they shall have to give one month's prior notice or forfeit one month's pay in lieu thereof. Their services will be terminated if they are not selected by the selection committee.

Their original Educational Qualification, date of and domicile certificates should be checked before handed over charge of the post and attested copies thereof be kept on record of the school/office.

TA etc is not allowed on first appointment.

**ATTESTED**  
 [Signature]  
 [Signature]  
 [Signature]

5. The should be sent to the Agency/Civil Surgeon concerned for medical examination the day on which they reports their arrival for duty and no pay should be drawn for them unless and until they produce their health and age certificates from the said surgeon.

6. Their verification roll of character and antecedents duly verified by the police Deptt, should be submitted with should be submitted with charge reports.

The pay scale and service rules would be subject to revision in accordance with the order to be passed by the Government of N.W.F.P.

They should not be handed over charge of the post if they are below (18) or above 25 years of age.

If they fails to report their arrival within 15 days a report to this effect should be sent to this Directorate AT ONCE.


11. The candidates knowledge in Islamic Education and Pak studies must be judged before handed over charge of the post.

(MUHAMMAD HUSSAIN KHAN)  
DY: DIRECTOR OF EDUCATION  
(FATA) N.W.F.P. PESHAWAR.

Direct: No. 15828-46 / A-1/Close. Dated Pesh; the 10/5/82 / 1987.

Copy forwarded for information and necessary action to the:-

- 1-2:- Headmaster, G.M.S. Angori, Barzi (Emergen Agency), Cheljo (Orakzai Agency), Shinkai (SWA) Saiful Darra (Orakzai) Chahmalai (SWA), Kamar Khel Attari (Khyber), Sandu Khel, (Gommand Agency), Sardi Khel (FR) Bannu.
- 10-18:- Candidates concerned. P/Files.

  
Dy: Director of Education,  
(FATA) N.W.F.P. Peshawar;

Muntaz Hassan,

10/5/82

**OFFICE OF THE DIRECTOR SECONDARY EDUCATION N.W.F.P.**  
**PESHAWAR**

**AWARD OF SELECTION GRADE:**

Under the provision of rules 4(1) of the Govt: of NWFP, Finance Deptt: Notification No. FD (PRC) 1-1/87/VIII dated 22.1.1987, The following Junior Clerks (BPS-5) of Education Deptt: NWFP are hereby placed in Selection Grade BPS-07 33% of the total posts with effect from the date as noted against each:-

S. No.	Name & Designation & address	Date of award
1.	Amjad Ali S/O Mohib Gul J/Clerk at DEO (F) pry Charsadda.	26.1.1996
5.	Arab Khan s/o Akhtar Khan J/Clerk at A.E.O. Khyber Agency.	25.3.1997
20..	Mosahib Hussain S/o Qadam Hussain J/C at GHS No.1 parachinar Kurram Agency	7.2.1997

Note:-

Necessary entry to this effect should be made in their Service Book.

(Qaisro Khan)  
Dy: Director Secy: Education  
N.W.F.P. Peshawar

Endst: No. 396-515/A-23/S. Grade of J/C

Dated: 5/8/1998

Copy forwarded to all concerned.

**ATTESTED**



pay in ass.?  
list in 8/88

*m*

OFFICE OF THE DIRECTOR SECONDARY EDUCATION N.W.F.P. PESHAWAR.

B-6

AWARD OF SELECTION GRADE.

Under the provision of rules 4(i) of the Govt; of NWFP, Finance Deptt; Notification No. FD (PRC) 1-1/87/VIII dated 22-1-1987, The following Junior Clerks (BPS-5) of Education Deptt; NWFP, are hereby placed in Selection Grade BPS-12 33% of the total posts with effect from the date as noted against each:-

S.No.	Name & Designation & Address	Date of Award.
1.	Mr; Anjad Ali S/O Motib Gul J/Clerk at DEO(F) Piry Charsadda.	26-11-1996.
2.	Mr; Mohammad Daud Shah S/O Shah Zaman J/C at GHS, Shingora (Dir)	26-11-1996.
3.	Mr; Tajdur Mohd Khan S/O Mohammad Saleem J/C at GHS, No.1 Bannu City.	37-1-1997.
4.	Mr; Fidaullah Khan S/O Fazali Elahi J/Clerk at GHS, Miran Shah (NWA)	25-3-1997.
5. ✓	Mr; Arab Khan S/O Akhtar Khan J/C at A.E.O, Khyber Agency.	25-3-1997. ✓
6.	Mr; Aliq Shah S/O Noor Shah J/C at GHS, Shangai Khyber Agency.	25-3-1997.
7.	Mr; Ishaq Ahmad S/O Gul Sarwar Din J/Clerk at Shamozan Kot (NW&)	25-3-1997.
8.	Mr; Sanaulah S/O Mohd Younas Khan J/Clerk at Govt; Post Grd; College Haripur.	27-12-1997.
9.	Mr; Sardari Mulk S/O Shehi Mulk J/C at G.D. College Timbengara Dir.	27-12-1997.
10.	Mr; Tariq Aziz S/O Ghulam Jan J/C at GHS, Mehra D. I. Khan.	27-12-1997.
11.	Anwar Khan S/O Ghulam Sabir J/C GGSS, Begun Shahbud Din Peshawar.	27-12-1997.
12.	Mr; Mohd Pervez S/O Khan Bahader J/C at SDEO(F) T/Bhai Mardan.	27-12-1997.
13.	Mr; Faiz Dil Gul Nawab Khan J/C at GHS, Tattar Khel Karak.	27-12-1997.
14.	Mr; Mohd Hanayun S/O Azizur Rehman J/C at Govt; College (W) Mardan.	27-12-1997.
15.	Mr; Hamidullah S/O Mohd Sher J/C at GHS, Baka Khel FR. Bannu	27-12-1997.
16.	Mr; Serdar Ali S/O Lal Khan J/C at Govt; College No.2 Mardan.	27-12-1997.
17.	Mr; Wasib Gul S/O Hamid Gul J/C at GHS, Katozai Charsadda.	27-12-1997.
18.	Mohd Khalid S/O Nawab Khan J/C at G.D. College Khanpur Haripur.	27-12-1997.
19.	Mr; Nisarud Din S/O Sherafud Din J/C at GHS, Sakhra Swat.	27-12-1997.
20.	Mr; Mosehib Hussain S/O Qadam Hussain J/C at GHS, No.1 Parachinar Kurran Agency	27-12-1997.

(Continued Page-2)

*[Handwritten signature and stamp]*



S.No. Name & Designation & Address Date of Award.

21. Sher Zali S/O Sher Alam J/Clerk at SDEO (F) Peshawar. 27-12-1997.
22. Shahidu-Din S/O Mahlan Dastagir J/C at GHSS, Saner Bugh, Dir. 27-12-1997.

## 23. Note:

1. Necessary entry to this effect should be made in their S/Book.
2. An Under taking to the effect that if any over payment is made to them as a result of incorrect award of Selection Grade detected later on it will be made good by recovery from their pay/Pension/gratuity ETC; may be obtained from their and posted in their S/Book.
3. Certificate to the effect that the Official concerned are not involved in any disciplinary cases should be recorded in their S/ Book by the Drawing & Disbursing Officers before making fixation of pay.

(MAISRO KHAN)  
DEPUTY DIRECTOR SECY: EDUCATION  
NWFP, PESHAWAR.

Endst: No. 396-518 /A-23/S. Grade of J/C

Dated S.S /197

Copy forwarded for information & n/action to the:-

1. Accountant General NWFP, Peshawar.
2. Director of Education (Colleges/FATS/Pry; /Berau NWFP,
3. Divl; Director of Education (S) Concerned.
4. District Education Officer (MFP) Secy; & Pry; Concerned.
5. Principal Govt; College (MFP) Concerned.
6. Principal GHSS/GOSS/GHS/GOSSS Concerned.
7. R.D.E, NWFP, Peshawar.
8. Distt; ~~Branch~~ Agency Accounts Officer Concerned.
9. Agency Education Officer Concerned.
10. SDEO (MFP) Concerned.
11. Official Concerned.
12. P.A. to Director Secy; Esu; NWFP; Peshawar.
13. Master File.

DEPUTY DIRECTOR  
FOR/DIRECTOR SECY: EDUCATION  
NWFP, PESHAWAR.

Z. Ali /

OFFICE OF THE AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD.

C-7

MOVE-OVER/

Mr. Arab Khan Junior Clerk Govt; Higher Secondary School Jamrud Khyber Agency who reached the maximum of BPS NO.8 (Rs.1540-88-2860) on 1-12-2000 is hereby allowed Move-over to BPS NO.9 (Rs.1605-97-3060) w.e.f. 1-12-2001 in the light of the revision of BPS scheme 1991 issued by the finance department vide his No.FD(PRC) 1-1/89 dated 26-11-1990.

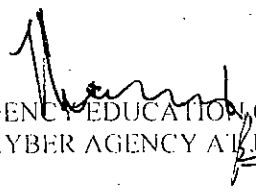
Necessary entry to this effect should be made in his service book.

(JANGI KHAN)  
AGENCY EDUCATION OFFICER,  
KHYBER AGENCY AT JAMRUD.

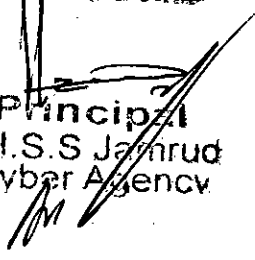
Endst:No: 3720-22 Dated, Jamrud the 8/7 /2003.

Copy forwarded to the:-

01. Principal GHSS Jamrud Khyber Agency with reference to his letter No.5067 dated 5-7-2003.
02. Agency Accounts Officer Khyber Agency at Peshawar.
03. AAEQ (Jamrud) local office.

  
AGENCY EDUCATION OFFICER,  
KHYBER AGENCY AT JAMRUD.

**ATTESTED**

  
Principal  
G.H.S.S Jamrud  
Khyber Agency

D-8

**DIRECTORATE OF EDUCATION FATA KHYBER PUKHTOON KHWA PESHAWAR.**

**PROMOTION/ADJUSTMENT**

Consequent upon the promotion of Junior Clerks to the post of Senior Clerk (B-9) and placement of their services at the disposal of Directorate of Education FATA vide Director Elementary & Secondary Education Khyber Pukhtoon Khwa Peshawar Office Order issued under Endst:No.3750-57/A-23/MS/Promotion J/C to S/C dated 26.4.2010, the following Senior Clerks are hereby adjusted against the vacant posts of Senior Clerks mentioned against their names with immediate effect in the best interest of Public Services:-

S#	Name Present Designation	Promoted/Adjusted	Remarks
1	Ghulam Nabi, J/C GHSS Spindand (Khyber Agency)	GHSS Spindand (Khyber Agency)	Against vacant S/Clerk Post.
2	Mohammad Ali Shah, J/C GHS Borki (Kurram Agency)	GGHSS Landi Kotal (Khyber Agency)	Against vacant S/Clerk Post.
3	Zamin Hussain, J/C GHS Shalozan (Kurram Agency)	GHS Dogar (Kurram Agency)	Against vacant S/Clerk Post.
4	Gul Zada, J/C GHS Prang Ghar(Mohmand Agency).	GHS Ghazi Baba (Bajaur Agency)	Against vacant S/Clerk Post.
5	Zardool Khan, J/C GHS Kog Pand (Mohmand Agency)	G.C.E.T(F)Jamrud (Khyber Agency)	Against vacant S/Clerk Post.
6	Niqab Shah, J/C GHS Yousaf Khel (Mohmand Agency)	GHSS Ghallanai (Mohmand Agency)	Against vacant S/Clerk Post.
7	Gula Jan, J/C GHS Topmondal (Bajaur Agency)	GHSS Gardai (Bajaur Agency)	Against vacant S/Clerk Post.
8	Arab Khan, J/C AEO Khyber Agency.	Agency Education Officer Khyber Agency.	Against S/Clerk Post already occupied

Note:- Charge Report should be submitted to all concerned.

(Fazal-e-Manan)  
Director of Education  
(FATA) K.P.K, Peshawar

Endst:No. 5769-95

Dated 29 /4/2010

Copy forwarded for information & necessary action to the:-

1. Additional Accountant General (PR) Sub Office, Peshawar.
2. Director Elementary & Secondary Education K.P.K, Peshawar.
3. Agency Education Officers concerned.
4. Agency Accounts Officers concerned.
5. Superintendent Establishment Local Directorate.
6. Officials concerned.
7. P.A to Director Education FATA Local Directorate.

**ATTESTED**

*[Handwritten signature and stamp]*  
G.C.E.T(F) Jamrud  
KHYBER AGENCY

*[Handwritten signature]*  
Dy: Director of Education  
(FATA) K.P.K, Peshawar



**Agency Education Office**  
**Khyber Agency at Jamrud**  
PHONE. 091-5820265 FAX 091-5820023

Ref:-11454

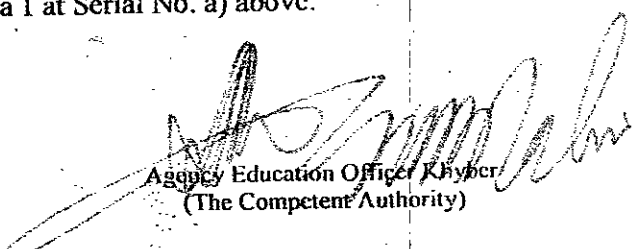
dt:-17/02/2015

E-9

**CHARGE SHEET.**

1. I, Atiq-ur-Rahman, the Agency Education Officer Khyber, as competent authority under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby charge you, Mr. Arab Khan S/C GHSS Jamrud Khyber Agency as follow:-

- a) That you while posted as S/C at the office of AEO Khyber Agency, received Rs65000/= from the widow and son (Mr. Jibran ) of deceased Mr Mohammad Irshad PTC GPS Raees Killi BZK LKL( Preparing Financial Assistance, Group insurance and EEF from GHS Badshah Mir Killi Primary section ), as illegal gratification for preparing the aforesaid papers feigning that account office is demanding the same.
2. By reason of the above, you are guilty of acts of omissions and commission under section (b) and (c) of rules 3 of the said rules and have rendered yourself liable to all or any of the penalties specified in rule 4 of the rules ibid.
3. You are therefore required to submit your written defence within seven days not more than 15 days of the receipt of this charge sheet
4. Your written defence, if any, should reach the under signed within 7 days not more than 15 days failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to heard in person
6. Statement of allegations described in Para 1 at Serial No. a) above.

  
Agency Education Officer Khyber  
(The Competent Authority)

Endst: Dated 11455-61 dt17/02/2015

Copy forwarded to:

1. Additional Chief Secretary FATA Secretariat Peshawar.
2. Secretary Social Sector Department FATA.
3. Director Education FATA.
4. Political Agent Khyber.
5. DS Services(AI&C) FATA Secretariat Peshawar
6. Assistant Political Agent Jamrud.
7. DD(M&E) Dte of Edu FATA Peshawar.

Agency Education Officer,  
Khyber Agency at Jamrud.

Attested  
Arab Khan.

To,

The Agency Education Officer,  
Jamrud Khyber Agency.

F-10

**Subject:** **Reply to the Charge Sheet**

Reference to your charge sheet vide No.11454, dated 17/02/2015, the Defendant (Mr. Arab Khan S/C GHSS Jamrud Khyber Agency), begs to submit as follow.

1. That the charge of receiving amount Rs. 65000/- mentioned in Para 1 of the charge sheet from the son (Mr. Jibran) & widow of the deceased Mr. Mohammad Irshad PTC GPS Raees Killi BZK LKL (for preparing Financial Assistance, Group insurance & EEF from GPS Raees Killi BZK LKL) is totally baseless, false and hence denied.
2. That the fact of the matter is that defendant has never been involved in any type of financials discrepancies during his service.
3. That the defendant has been transferred from Agency Education Office to GHSS Jamrud Khyber Agency as S/C one year ago i.e February 2014. After the period of one year associating the defendant with an illegal activity related to the previous organization creates a series of doubts.
4. Further that for the allegation leveled against the defendant in the charge sheet, there is an undertaking from Mr. Jibran (Son) & Mist Shata Bibi (Widow) of the deceased PTC, Mr. Mohammad Irshad on judicial stamp bearing witness signatures (annex with the Reply), where they solemnly affirm and state as under,
  - The defendant has not received any money from them as legal or illegal gratification.

In the light of the above mentioned circumstances, it is humbly requested that the reply of the defendant in response to the charge sheet letter may be accepted without any further action.

Thanks,

Your Obediently,

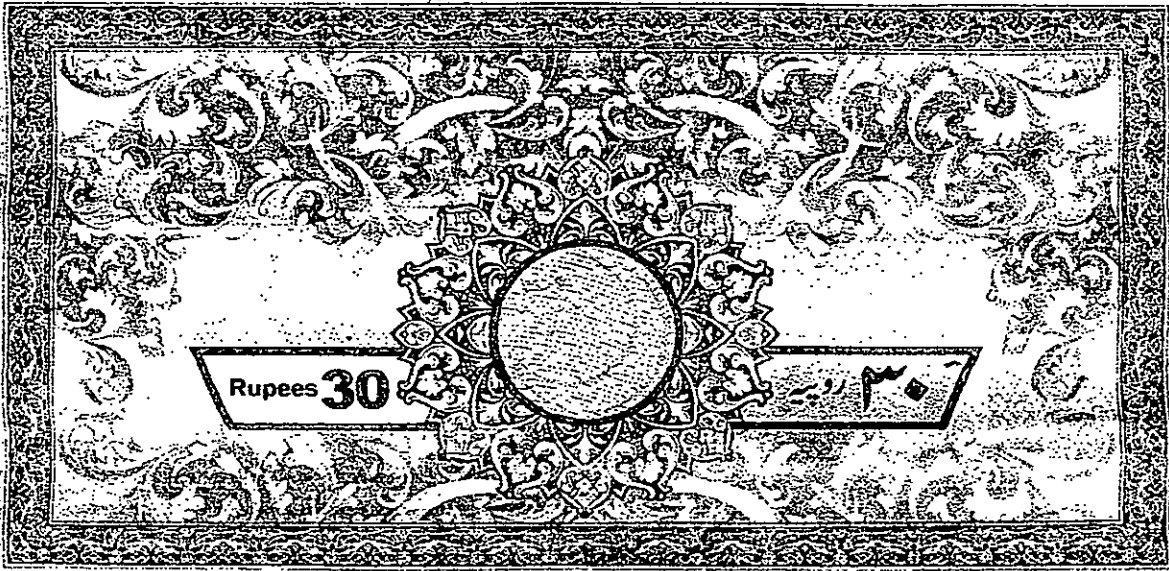
*Arab Khan*

**Arab Khan S/O Akhtar Khan**  
Senior Clerk GHSS Jamrud  
Khyber Agency.

Copy forwarded to:

1. Additional Chief Secretary FATA Secretariat Peshawar.
2. Secretary Social Sector Department FATA.
3. Director Education FATA.
4. Political Agent Khyber Agency.
5. DS Services (AI&C) FATA Secretariat Peshawar.
6. Assistant Political Agent Jamrud.
7. DD(M&E) Dte of Edu FATA Peshawar.

*Attested  
Arab Khan*



بیان جبران علی ولد ارشاد علی (مرحوم) بی بی سی  
رٹس ملے بازار ذخہ خیل  
صماتہ شادہ بی بی بیویہ ارشاد علی (مرحوم)

ہم یعنی مسی جبران علی ولد ارشاد علی (مرحوم) اور صماتہ  
شادہ بی بی بیویہ ارشاد علی (مرحوم) بی بی سی گوورنمنٹ پرائمری سکول  
رٹس ملے بازار ذخہ خیل بذات خود بیوش اور بیواس میں درجہ ذیل  
گواہان کی موجودگی میں یہ بیان (اعتراف) کرتے ہیں۔ کہ ہم نے جو بیان  
عرب خان ولد اختر خان منسٹر کلرک (senior clerk) کے مطابق متعلقہ (65000/-) روپے  
کا جو بیان A.E.O. خیر کو دیا تھا۔ وہ A.E.O. خیر کے بار بار اصرار اور دباؤ  
کے تحت دیا تھا کیونکہ اس نے دوران سروس ملازم فونڈنگ کے مراعات کا  
رایج دے کر دلوایا تھا۔ وہ بیان ہم واپس لیتے ہیں۔ اور ہمارا عرب خان  
پر کوئی لگے دعویٰ نہیں ہے۔ کیونکہ عرب خان نے مذکورہ 65000/- روپے  
میں کبھی نہیں لئے ہیں۔

Attest of  
Arshad Khan

جبران علی

① جبران علی ولد ارشاد علی (مرحوم)

212203-8392910-5

② صماتہ شادہ بی بی بیویہ ارشاد علی (مرحوم)

212203-8862189-0

20/2/2015

گواہان منسٹر خان ولد مبارک شاد ذخہ خیل  
① ارشد علی ولد جبران علی کوئی قریبی  
③ گل اسلام ذخہ خیل

Principal  
Govt. College of Educators  
& Elementary Teachers  
& Higher Agency

NOTIFICATION:-

H-12

1. **WHEREAS** Mr Arab Khan senior clerk GHSS Jamrud while posted at the Agency Education office Khyber had made illegal collection to the tune of Rs65000/= in two installment from the widow and son( Mr Jibran) of deceased Mohammad Irshad PTC GPS Raees Killi BZK LKL ( preparing financial assistance, group insurance and the EEF from Badshah Mir Killi Primary section ), as illegal gratification for preparing the aforesaid papers feigning that accounts office Khyber is demanding the same
2. **AND WHEREAS** the affected family member Mst Shada Bibi and Mr Jibran the son of the deceased complained that the Mr Arab Khan had collected illegal gratification
3. **AND WHEREAS** Mr Arab Khan was asked through Mr Sher Khan J/C, the cousin of Mr Arab Khan to pay the illegal amount to the poor family who assured that the same will be paid and they will never complain again.
4. **AND WHEREAS** the aggrieved family of deceased Irshad Ali again came to the office on 17<sup>th</sup> of February 2015 at 12:04:57PM with the same complaint.
5. **AND WHEREAS** both the family members of deceased Irshad Ali photo graphs were taken and their grievances were recorded in audio and video forms
6. **AND WHEREAS** consequently Mr Arab Khan was charge sheeted vide this office No.11454-61 dt 17/02/2015
7. **AND WHEREAS** Mr Arab Khan responded to the charge sheet supplementing the reply with a photo copy of stamp paper from the aggrieved family that they will draw the charges and that photo copy of the stamp paper was attested from the Principal GCET(M) Jamrud on 26/02/2015
8. **AND WHEREAS** Mr Arab Khan was asked on the body of the reply to the show cause whether he likes to be heard in person.
9. **AND WHEREAS** Mr Dr Hanif ullah Khan Principal GHSS Landi Kotal was nominated for departmental prosecution in the instant case vide No.12580-87 dt 09/01/2015
10. **AND WHEREAS** Mr Arab Khan appeared for personal hearing on 09/01/2015 but could not prove his innocence save swearing that he has not collected Rs60000/= whereas the actual amount was Rs65000/=
11. **AND WHEREAS** the competent authority, the Agency Education officer Khyber, after having considered the charges, evidence on record, comments of the departmental prosecutor, the facts of the case, is of the view that the charges of corruption has been proved against Mr Arab Khan S/C
12. **AND WHEREAS** in exercise of the powers conferred under rules 4(b) (1) of Khyber Pukhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011, the competent authority, the Agency Education officer Khyber is pleased to imposed major penalty of "Reduction to the lower post of junior clerk" upon Mr Arab Khan S/C with immediate effect on account of his involvement in corruption (bribery).

Attested  
Arab Khan

Agency Education Officer,  
Khyber Agency at Jamrud.

Endst: No. 12588- Dated Peshawar the 31/03/2015

Copy forwarded to the:-

1. Additional chief secretary FATA secretariat Peshawar.
2. Secretary Social Sector Department FATA Secretariat.
3. Director Education FATA
4. Political Agent Khyber.
5. Deputy Director (M&E) Directorate of Education FATA
6. Principal GHSS Jamrud for entry in his service book.
7. Agency Accounts officer Khyber Agency at Jamrud.
8. AAEOs local office.
9. Superintendent local office
10. Official Concerned.

Received on behalf of  
13/4/2015 10 AM

Munir  
Principal  
GHSS  
Khy

Agency Education Officer,  
Khyber Agency at Jamrud.

TO

The Director FATA (E&SE) Department,  
Warsak Road, Khyber Pakhtunkhwa, Peshawar.

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE  
IMPUGNED ORDER DATED 31-03-2015  
COMMUNICATED TO THE APPELLANT ON 13-  
04-2015 WHEREBY THE MAJOR PENALTY OF  
REDUCTION TO LOWER POST OF JUNIOR  
CLERK FROM THE POST OF SENIOR CLERK  
WAS IMPOSED ON THE APPELLANT  
INVIOATION OF LAW AND WITHOUT  
CONDUCTING REGULAR INQUIRY IN THE  
MATTER**

Respected sir,

Most humbly appellant begs to submit as under:

- 1- That appellant was appointed as junior clerk in Education Department on regular basis and on the proper recommendations of Departmental Selection Committee. That in response to the said order the appellant submitted his arrival report on the very next day and started performing his duty quite efficiently and up to the entire satisfaction of his superiors.
- 2- That appellant being senior most amongst his colleagues was promoted to the post of Senior Clerk (BPS-9) on the recommendation of Departmental promotion committee. That appellant while serving the Department at Government Higher Secondary School Jamrud Khyber Agency was served with Charge Sheet on the wrong and baseless allegation of involvement in corruption (Bribery) while he was posted at Agency Education Office Khyber in February 2014 received Rs.65000/- from the widow and son of late Muhammad Irshad PTC on account of preparing Financial Assistance, group Insurance etc.
- 3- That in response to the Charge Sheet appellant replied in detailed along with proof and denied the allegation which has been leveled against him. That the appellant also provided the affidavit of the complainant party to the enquiry officer in which the complainant party clearly admitted and stated that the complaint/allegation was made by them under the pressure of Agency Education Officer, Khyber Agency.

*Attested  
Arbab Ullah*



4- That the Agency Education Officer Khyber Agency without conducting fact finding inquiry and without conducting regular Departmental inquiry straight away issued the impugned order dated 31.3.2015 whereby the penalty of reduction in lower scale was imposed on the appellant.

5- That feeling aggrieved from the impugned order dated 31-03-2015 the appellant filed this Departmental appeal before your good self on the following grounds amongst the others.

**GROUND:**

- A- That the impugned order dated 31-03-2015 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the concerned authority in accordance with law and rules on the subject noted above and as such the concerned authority violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the concerned authority acted in arbitrary and malafidy manner by issuing the impugned order dated 31-03--2015.
- D- That no statement of allegation has been served on the appellant by the concerned authority before issuing the impugned order dated 31-03-2015 against the appellant.
- E- That no show cause notice has been served on the appellant before issuing the impugned order dated 31-03-2015.
- F- That No chance of personal hearing has been given to the appellant before issuing the impugned order dated 31-03-2015.
- G- That no regular Departmental nor fact finding inquiry were conducted by the concerned authority before issuing the impugned order dated 31.3.2015 against the appellant which is as per Supreme Court judgments is necessary in punitive actions against the civil servant.
- H- That the appellant inspite of providing the affidavit of the complainant party in which the complainant party clearly admitted and stated that the complaint/allegation was made by them under the pressure of Agency Education Officer Khyber Agency has issued the impugned order dated 31.3.2015.

*Attested  
Arbab*

It is therefore most humbly prayed that on acceptance of this Departmental appeal the appellant may very kindly be re-instate on the original post of Senior Clerk with all back benefits. Any other remedy which Your good self deems fit that may also be awarded in favor of the appellant.

Dated: 15-04-2015

Your's sincerely,

*Arab Khan*

**Arab Khan,  
Ex-Senior Clerk, GHSS Jamrud,  
C/O Room No.1, upper floor,  
Islamia club building Khyber Bazar,  
Peshawar City.**

*Attested  
Arab Khan*

**VAKALATNAMA**

IN THE COURT OF KPK Service Tribunal Peshawar

OF 2015

Arab Khan

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt:

(RESPONDENT)  
(DEFENDANT)

I/we Arab Khan

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. \_\_\_\_/\_\_\_\_/2015

Arab Khan

CLIENT

ACCEPTED

**NOOR MOHAMMAD KHATTAK  
(ADVOCATE)**

OFFICE:

Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazar,  
Peshawar City.

Phone: 091-2211391

Mobile No.0345-9383141

**BEFORE THE KHYBER PUKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL NO. 871/2015**

Arab Khan Ex-Senior Clerk (BPS-9) GHSS Jamrud Khyber

Agency.....Appellant.

VERSUS

1. The Director Education FATA (E&SE) Department Warsak Road Peshawar.
2. The Agency Education Officer Khyber Agency at Jamrud  
.....Respondents.

**Para-wise comments on behalf of respondent No:1&2.**

**Respectfully Sheweth:**

**Preliminary Objection**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant has concealed material facts from this Honourable Tribunal.
4. That the appellant is estopped by his own conduct to bring the present appeal.
5. That the appeal is bad due to mis-joinder and non-joinder of necessary parties.
6. That the appeal is barred by law and no departmental appeal is filed to the competent authority against the impugned order. Hence not maintainable under Section-4 of Service Tribunal Act.
7. The appeal is badly time barred.

**On Facts:**

1. Pertains to record.
2. Pertains to record.
3. Pertains to record.
4. Incorrect. The Competent Authority i.e Agency Education Officer Khyber Agency issued charge sheet to the appellant an account of receiving Rs. 65000/- from the widow and son (M.Jebran) of deceased Mr, Muhammad Irshad PTC GPS Raees Killi for the purpose of Financial Assistance, Group Insurance etc as illegal qualification. The appellant has been

informed that for the above reason you are guilty of acts of commission under Section (b) and (c) of rules 3 of the said rules and have rendered yourself liable to all or any of the penalties specified in rule-4 of the rules ibid (copy of charge sheet is attached as Annexure-A).


5. Incorrect. No such record/stamp paper is available in the record of the respondents which shows that the complaint has been made under the pressure of Agency Education Officer Khyber Agency.
6. Incorrect. As explained in Para-4 above.
7. The appellant has got no cause of action to file instant appeal.

**Grounds:**

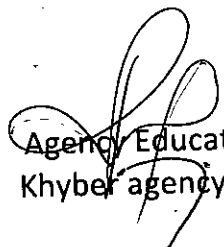
- A. Incorrect. All codal formalities have been fulfilled as evident from the Notification issued by the Competent Authority i.e Agency Education Officer Khyber Agency. No action has been taken by the respondents which is against law, facts and material on record (copy of Notification is attached as Annexure-B).
- B. Incorrect. The appellant case has been dealt by the Competent Authority in accordance with law and rules as no one is allowed to violate the law and rules/regulations.
- C. Incorrect. As explained in Para-B above.
- D. Incorrect. As explained in Para-A above.
- E. Incorrect. Charge Sheet has been issued by the Competent Authority i.e Agency Education Officer Khyber Agency as explained and annex with Para-1 of the facts.
- F. Incorrect. The Competent Authority has been given charge sheet to the appellant in which it has been stated in Para-5 that intimate whether you desire to heard in person.
- G. Incorrect. All codal formalities have been fulfilled before issuing the order. According to Supreme Court Decision each & every case has its own merit and circumstances.
- H. Incorrect. As explained in Para-5 of facts above.
- I. Respondents are also seek permission to advance other grounds & proofs at the time of arguments.

In the light of the above facts it is humbly prayed that the appeal may very kindly be dismissed having no legal force.

Respondent No.1

  
Director of Education FATA  
Warsak Road, Peshawar


Respondent No.2

  
Agency Education Officer  
Khyber agency at Jamrud.

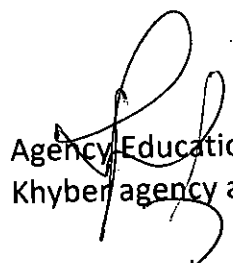
**Affidavit:**

We the respondents solemnly affirm and declare that the contents of the para wise reply are correct to the best of our knowledge and belief and nothing has concealed from this Hon`ble Service Tribunal.

Respondent No.1

  
Director of Education FATA  
Warsak Road, Peshawar

Respondent No.2

  
Agency Education Officer  
Khyber agency at Jamrud.

"A"



Agency Education Office

Ref:-11454

Khyber Agency at Jamrud

dt:-17/02/2015

PHONE: 091-5820265 FAX 091-5820023

CHARGE SHEET.

1. I, Atiq-ur-Rahman, the Agency Education Officer Khyber, as competent authority under Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, do hereby charge you, Mr. Arab Khan S/C GHSS Jamrud Khyber Agency as follow:-

- a) That you while posted as S/C at the office of AEO Khyber Agency, received Rs65000/= from the widow and son (Mr. Jibran ) of deceased Mr Mohammad Irshad PTC GPS Raees Killi BZK LKL( Preparing Financial Assistance, Group insurance and EEF from GHS Badshah Mir Killi Primary section ), as illegal gratification for preparing the aforesaid papers feigning that account office is demanding the same.
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3. You are therefore required to submit your written defence within seven days not more than 15 days of the receipt of this charge sheet
4. Your written defence, if any, should reach the under signed within 7 days not more than 15 days failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.
5. Intimate whether you desire to heard in person
6. Statement of allegations described in Para 1 at Serial No. a) above.

*[Signature]*  
Agency Education Officer Khyber  
(The Competent Authority)

Endst: Dated 11455-61 dt 17/02/2015  
Copy forwarded to:

1. Additional Chief Secretary FATA Secretariat Peshawar.
2. Secretary Social Sector Department FATA.
3. Director Education FATA.
4. Political Agent Khyber.
5. DS Services(AI&C) FATA Secretariat Peshawar
6. Assistant Political Agent Jamrud.
7. DD(M&E) Dte of Edu FATA Peshawar.

Agency Education Officer,  
Khyber Agency at Jamrud.

*Attested*  
*Arab Khan.*

NOTIFICATION:-

1. WHEREAS Mr Arab Khan senior clerk GHSS Jamrud while posted at the Agency Education office Khyber had made illegal collection to the tune of Rs65000/= in two installment from the widow and son( Mr Jibran) of deceased Mohammad Irshad PTC GPS Raees Killi BZK LKL ( preparing financial assistance, group insurance and the EEF from Badshah Mir Killi Primary section ), as illegal gratification for preparing the aforesaid papers feigning that accounts office Khyber is demanding the same
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8. AND WHEREAS Mr Arab Khan was asked on the body of the reply to show cause whether he likes to be heard in person.
9. AND WHEREAS Mr Dr Hanifullah Khan Principal GHSS Landi Kotal was nominated for departmental prosecution in the instant case vide No.12580-87h 09/04/2015
10. AND WHEREAS Mr Arab Khan appeared for personal hearing on 09/04/2015 but could not prove his innocence save swearing that he has not collected Rs60000/= whereas the actual amount was Rs65000/=
11. AND WHEREAS the competent authority, the Agency Education officer Khyber, after having considered the charges, evidence on record, comments of the departmental prosecutor, the facts of the case, is of the view that the charges of corruption has been proved against Mr Arab Khan S/C
12. AND WHEREAS in exercise of the powers conferred under rules 4(b) (1) of Khyber Pukhtunkhwa Government Servant (Efficiency and Discipline) Rules 2011, the competent authority, the Agency Education officer Khyber is pleased to imposed major penalty of "Reduction to the lower post of junior clerk" upon Mr Arab Khan S/C with immediate effect on account of his involvement in corruption (bribery).

Attested  
Anwar

Agency Education Officer,  
Khyber Agency at Jamrud.

Endst: No. 12588- Dated Peshawar the 31/03/2015

Copy forwarded to the:-

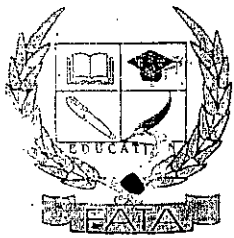
1. Additional chief secretary FATA secretariat Peshawar.
2. Secretary Social Sector Department FATA Secretariat.
3. Director Education FATA
4. Political Agent Khyber.
5. Deputy Director (M&E) Directorate of Education FATA
6. Principal GHSS Jamrud for entry in his service book.
7. Agency Accounts officer Khyber Agency at Jamrud.
8. AAEOs local office.
9. Superintendent local office
10. Official Concerned

Received on serial IV  
13/4/2015 10 AM  
An  
13/4/15

M. M. M.  
Principal  
GHSS  
Khy 10

Agency Education Officer,  
Khyber Agency at Jamrud.





No. / /

Dated / / 2016

RE-INSTAEMENT ORDER.

Consequent upon, the recommendation of Enquiry Committee, the Competent Authority is pleased to re-instate Mr. Arab Khan Ex: Senior Clerk, (BPS-14) Govt Higher Secondary School Jamrud Khyber Agency, (Now as Junior Clerk at GHSS Jamrud Khyber Agency.

Director Education FATA

Endst: No. 17008-16 / E-4 / G-File/116 Dated 28 / 12 / 2016

Copy to the:-

1. P.S to Additional Chief Secretary FATA Secretariat Peshawar.
2. P.S to Secretary Social Sector Department FATA.
3. Political Agent Khyber Agency.
4. Agency Education Officer Khyber Agency.
5. P.S to Deputy Secretary (AI&C) FATA Secretariat Peshawar.
6. Assistant Political Agent Jamrud Khyber Agency.
7. Deputy Director (M&E) Directorate Of Education FATA
8. P.A to Director Education FATA.
9. Official Concerned.

*AB* 27/12/2016  
Deputy Director (F&A)

27/12/16