


11th April, 2023 Appellant in person present. Mr. Muhammad Jan,
District Attorney alongwith Mr. Rehmanullah, SST for the
respondents present.

Appellant seeks adjournment on the ground that his
counsel is not available today. Appellant is directed to
ensure presence of her counsel to argue the case on the
next date positively. To come up for arguments on
01.06.2023 before D.B. P.P given to the parties.

SCANNED
KCSST
Peshawar


(Muhammad Akbar Khan)
Member (Executive)


(Kalim Arshad Khan)
Chairman

15.09.2022

Appellant alongwith counsel present.

Naseer Uddin Shah, learned Assistant Advocate General alongwith Muhammad Latif, Superintendent for respondents present.

Representative of the respondent Department is directed to produce relevant record in respect of the appellant as well as his brother. Adjourned. To come up for production of record and arguments on 28.11.2022 before D.B.

(Fareeha Paul)
Member (E)

(Rozina Rehman)
Member (J)

28/11/22

Deleted from list to come up for the same on 7/2/23

07.02.2023

Appellant alongwith counsel present. Umair Azam, Learned Additional Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment in order to prepare the brief. Adjourned. To come up for arguments on 11.04.2023 before D.B.

SCANNED
KPST
Kahawa

(Fareeha Paul)
Member (E)

(Rozina Rehman)
Member (J)

SA7351/21

22nd June, 2022

Counsel for the appellant present. Mr. Naseerud Din Shah, Asstt. A.G alongwith Farhan Ahmad, Asstt. for the respondents present.

Respondents have submitted reply/comments, which is placed on file. To come up for arguments on 08.09.2022 before the D.B.



(Kalim Arshad Khan)
Chairman


08.09.2022

Appellant alongwith his counsel present.

Muhammad Jan, learned District Attorney for respondents present.

Partial arguments heard. For the just decision of case, brother of appellant who was appointed against deceased son quota be summoned alongwith relevant record on 15.09.2022 before D.B.

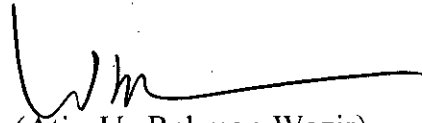

(Fareeha Paul)
Member(E)


(Rozina Rehman)
Member(J)

19.01.2022

Appellant with counsel present. Mr. Muhammad Adeel Butt; Addl. AG for respondents present. Respondents No. 6 & 7 in person present.

Reply/comments on behalf of official respondents as well as private respondents are still awaited. Learned Additional Advocate General as well as private respondents No. 7 sought time for submission of reply/comments. Last opportunity is granted. To come up for reply/comments before the S.B. on 16.03.2022.


(Atiq-Ur-Rehman Wazir)
Member (E)

16.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 09.06:2022 for the same as before.

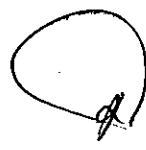

Reader

09.06.2022

Junior to counsel for the appellant present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General alongwith Farhan Assistant for official respondents No.1 to 5 present. Private respondent No.7 in person present.

Reply on behalf of respondents was not submitted. Respondents requested for time to submit reply/comments. Last opportunity is granted. To come up for reply/comments on 22.06.2022 before S.B.


(Rozina Rehman)
Member (J)

Abdul Hadi, 7351/2021

20.10.2021 Learned Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant contended that the appellant is aggrieved of impugned order dated 18.03.2021 whereby major penalty of "removal from service alongwith recovery of salaries drawn by him in the capacity of Junior Clerk" was awarded to him. The appellant preferred departmental appeal against the impugned order, on 26.05.2021. His departmental appeal was filed on 2.08.2021, hence, the instant service appeal was filed in the Service Tribunal on 25.08.2021. Moreover, the impugned orders were passed not only in violation of the prescribed procedure but are also based on malafide intention when the appellant was denied the right of cross-examination. The impugned orders are not tenable and may therefore be set aside and appellant be reinstated in service with all back benefits.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections including limitation. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time or extension of time is not sought, the office shall submit the file with a report of non-compliance. File to come up for arguments on 19.01.2022 before the D.B.

Appellant Deposited
Security & Process Fee

20/10/21

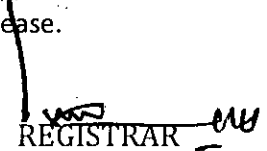

(Mian Muhammad)
Member(E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7351 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	31/08/2021	<p>The appeal of Mr. Abdul Hadi resubmitted today by Mr.Abdullah Qazi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench at Peshawar. Notice be issued to appellant/counsel for preliminary hearing to be put up there on <u>20/10/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-		

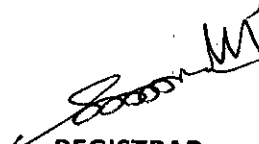
SCANNED
PESHAWAR

The appeal of Mr. Abdul Hadi, District Bajaur presented today i.e. on 25.08.2021 is incomplete on the following score which is returned to the counsel for the appellãnt for completion and resubmission within 15 days:


- 1- Annexures of the appeal may be attested.
- 2- Certificate be given to the effect that the appellãnt has not been filed any service appeal earlier on the subject matter before this Tribunal.
- 3- Check list is not attached with the appeal.

No. 1681 /S.T,

Dt. 26/08 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Abdullah Qazi Adv., Pesh.

Resubmitted after doing it
necessary.

21/8/2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. 7351/2021

Abdul Hadi. **APPELLANT**

VERSUS

Secretary, Higher Education & others. . . . **RESPONDENTS**

I N D E X

S.#	Description of Documents	Annex	Pages
1.	Service Appeal		1-6
2.	Affidavit		7
3.	Addresses of the Parties		8-9
4.	Copy of Appointment Order dated 29.10.2018, Charge Report and Medical Certificate	A	10-13
5.	Copy of Service Book	A/1	14-17
6.	Copies of Charge Sheet, Statement of Allegations, Reply, Inquiry Report and Show Cause Notice	B	18-27
7.	Copy of Removal Order dated 18.03.2021	B/1	28
8.	Copy of Departmental Appeal	C	29-31
9.	Copy of Impugned Order dated 02.08.2021	D	32
10.	Copy of Diary and Dispatch Register And Applications & letters	E	32/A-36
11.	Wakalatnama		37

Abduli
Appellant

Through

Abdullah Qazi
ABDULLAH QAZI
Advocate High Court
Cell: 0333-9038270

Dated: 25.08.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Abdul Hadi S/o Said Gulab R/o Maminzo, P.O & Tehsil
Khar, District Bajaur. **APPELLANT**

VERSUS

1. Secretary, Higher Education, Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
2. Director, Higher Education, Khyber Pakhtunkhwa,
Rano Ghari near Chamkani Mor, Peshawar.
3. Deputy Director (Establishment), Higher Education,
Khyber Pakhtunkhwa, Rano Ghari near Chamkani
Mor, Peshawar.
4. District Education Officer (DEO), Bajaur.
5. District Accounts Officer, Bajaur.
6. Principal, Govt. Degree College, Nawagai, Bajaur.
7. Mr. Abdul Haq, Ex-Principal, Govt. Degree College,
Nawagai, Bajaur.
8. Mr. Khaista Rehman, Ex-DEO, District Bajaur,
presently Principal, GHS Khar No.1, Bajaur R/o
Village Inam Khwaro Chinagai, Tehsil Wara
Mamond, P.O Inayat Kalay, District Bajaur.
9. Mr. Ilyas Ex-Head Clerk, DEO Office, District
Bajaur, presently Assistant, GHSS Gardai, District
Bajaur, R/o Naro Oba, Gulo Shah, Tehsil Salarzai,
P.O Raghagan, District Bajaur. **RESPONDENTS**

**APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT, 1974 READ WITH
RELEVANT RULES, AGAINST THE ORDER
BEARING ENDST NO.6259-61/GDC, NAWAGAI,
DATED 18.03.2021, WHEREBY MAJOR PENALTY**

OF REMOVAL FROM SERVICE ALONGWITH RECOVERY OF SALARIES DRAWN IN THE CAPACITY OF JUNIOR CLERK WAS IMPOSED UPON THE APPELLANT AND THE ORDER DATED 02.08.2021, WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS FILED.

Respectfully Sheweth:

1. That the appellant was appointed as Junior Clerk, vide order dated 29.10.2018 against the employee's son quota. (Copy of Order is annexure "A").
2. That in compliance of the above, the appellant submitted his arrival report and took charge of his duties on 01.11.2018, as such since his appointment, the appellant performed his duties efficiently and with the entire satisfaction of his superiors. It is pertinent to mention here that the salary of appellant was started/released w.e.f 01.11.2018. (Copy of Service Book is attached as annexure "A/1")
3. That during his service, a fact finding inquiry was conducted and consequently a so-called former inquiry was ordered/conducted and imposition of major penalty of removal from service was recommended against the appellant. (Copies of Charge Sheet, Statement of Allegations, Reply, Inquiry Report and Show Cause Notice are annexure "B").

4. That in line with the recommendation of the above order, the major penalty of removal from service alongwith recovery of salaries drawn by the appellant in the capacity of Junior Clerk was imposed upon the appellant, with immediate effect.
5. That the appellant submitted a departmental appeal/representation before respondent No.1, against the order dated 18.03.2021 (annexure "B"//) which was filed, vide order dated 02.08.2021, copy of which was received by the appellant on 24.08.2021. (Copy of Departmental Appeal and Impugned Order are annexure "C" & "D").
6. That being aggrieved from the impugned orders dated 18.03.2021 & 02.08.2021, the appellant approaches this Hon'ble Tribunal on the following amongst other grounds:-

GROUND S:

- A. That the both impugned orders passed by respondent No.1 & 2 are against the law and facts on record, hence liable to be set aside/cancelled/ varied.

- B. That the impugned orders are in violation of the procedure prescribed regarding the matter in hand, hence not tenable.
- C. That the allegations against the appellant are illegal, unjust, against the facts/circumstances and law, hence the impugned orders are required to be cancelled/varied/set aside.
- D. That the bias and malafide of the respondents as against the appellant is apparent from the very record as the diary and dispatch register has been tampered with which is evident from the record attached with the instant appeal.
- E. That the diary and dispatch register has been tampered/reconstructed illegally, malafidely and unjustly to make a room for passing/supporting an illegal order against the appellant.
- F. That a valid appointment order dated 29.10.2018 of the appellant has been tried/shown to have no record, which is against the facts and record, hence the allegations against the appellant are totally wrong, against facts and based on malafide.

- G. That the appellant has unblemished service record and despite a valid and legal appointment dated 29.10.2018, the appellant has been removed from service on an ambiguous and vague inquiry.
- H. That a Photostat copy of the alleged order dated 28.10.2018 has been relied malafidely and a legal and correct order dated 29.10.2018, which has been acted upon in all the relevant/concerned offices, has been done away with and has been falsified wrongly.
- I. That despite the fact that tampering in the dispatch register is very much clear and evident, the same has not been considered by the inquiry committee/officers and thus have come to a wrong conclusion while submitting a so-called inquiry report. It is pertinent to mention here that the dispatch register has been shown to have closed (and that too by a Clerk of the DEO Office) at Serial No.1527, dated 29.10.2018 and have shown to have started from Serial No.1542-46 dated 30.10.2018.
- J. That the appellant has not been treated in accordance with law and has been condemned unheard.

- K. That no chance of cross-examination has been provided to the appellant.
- L. That the appellant seeks leave of this Hon'ble Tribunal to raise further points at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the impugned orders dated 18.03.2021 & 02.08.2021 issued by respondents may kindly be cancelled/varied/set aside and the appellant may kindly be re-instated into service with all back benefits.

Any other remedy which is deemed fit by this Hon'ble Tribunal in the interest of justice, may also be granted in favour of appellant.

Through

Ahmed
Appellant

ABDULLAH QAZI
Advocate High Court

Dated: 25.08.2021

CERTIFICATE:

It is certified as per instruction of my client that no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

ABDULLAH QAZI
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

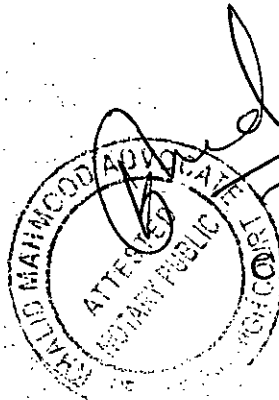
Abdul Hadi. **APPELLANT**

VERSUS

Secretary, Higher Education & others. **RESPONDENTS**

AFFIDAVIT

I, Abdul Hadi S/o Said Gulab R/o Maminzo, P.O & Tehsil Khar, District Bajaur, do hereby solemnly affirm and declare that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

CNIC: 21103-6497174-3

Cell: 0302-8196968

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Abdul Hadi. **APPELLANT**

VERSUS

Secretary, Higher Education & others. **RESPONDENTS**

ADDRESSES OF PARTIES

APPELLANT:

Abdul Hadi S/o Said Gulab R/o Maminzo, P.O & Tehsil
Khar, District Bajaur.

RESPONDENTS

1. Secretary, Higher Education, Khyber Pakhtunkhwa,
Civil Secretariat, Peshawar.
2. Director, Higher Education, Khyber Pakhtunkhwa,
Rano Ghari near Chamkani Mor, Peshawar.
3. Deputy Director (Establishment), Higher Education,
Khyber Pakhtunkhwa, Rano Ghari near Chamkani
Mor, Peshawar.
4. District Education Officer (DEO), Bajaur.
5. District Accounts Officer, Bajaur.
6. Mr. Abdul Haq, Ex-Principal, Govt. Degree College,
Nawagai, Bajaur.

7. Mr. Khaista Rehman, Ex-DEO, District Bajaur, presently Principal, GHS Khar No.1, Bajaur R/o Village Inam Khwaro Chinagai, Tehsil Wara Mamond, P.O Inayat Kalay, District Bajaur.
8. Mr. Ilyas Ex-Head Clerk, DEO Office, District Bajaur, presently Assistant, GHSS Gardai, District Bajaur, R/o Naro Oba, Gulo Shah, Tehsil Salarzai, P.O Raghagan, District Bajaur.

Ameli
Appellant

Through

AM
ABDULLAH QAZI
Advocate High Court

Dated: 25.08.2021



10

Amman - A

OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT BAJAUR AT KHAR.

APPOINTMENT ORDER

Mr, Abdul Hadi s/o Late Said Gulab is hereby appointed against the vacant junior clerk post (Deceased) at Govt Degree college nawagai District Bajaur purely on temporary base in BPS 11 (12570- 880-38970) plus usual allowances as admissible under the rules in the light of establishment division islamabad letter No: 7/40/2005-E2, dated 13/6/2006 and FATA secretariat Directorate of Education Peshawar letter No: 7839-85, Dated 26/07/2016 in the interest of public service.

TERMS/ CONDITIONS:

1. The appointment of the candidate is made purely on temporary basis & liable to termination at any time without assigning any reason.
2. Charge report should be submitted to all concerned in duplicate.
3. All kind of documents should be verified from the concerned institution before the drawl of his salary.
4. Health and age certificate produced to this office to be obtained from the agency surgeon concerned.
5. His age should be according to the Govt policy.
6. If the failed charge report of the arrival within 15 days the appointment order will be automatically considered as cancelled.

(AMRULLAH WAZIR)
District Education Officer
District Bajaur.

Endst: No 1527-31 Dated 29/10/2018
Copy of the above is forwarded to the:

1. Director of education newly merge districts Peshawar.
2. District accounts officer bajaur tribal district.
3. Accountant of the local office.
4. Principal GDC Nawagai District Bajaur.
5. Official concerned.

Amman
District
Education Officer Bajaur.

(11)

CHARGE REPORT

I Mr. Abdul Hadi S/O Said Gulab took over charge of duty against the vacant junior clerk post at GDC nawagai district bajaur on 01/11/2018 vide district education officer bajaur Endst: no 1527-31 dated 29/10/2018 in the interest of public service.

Signature [Signature] 01-11-2018
(F.N.)

Abdul hadi JC

NO 862 Dated 8/11/2018

Copy of the above is forwarded to the:

1. Director of education newly merge districts Peshawar.
2. District accounts officer bajaur tribal district.
3. Principal GDC Nawagai District Bajaur.
4. Official concerned.

[Signature]

Principal
GDC nawagai district bajaur

PRINCIPAL
G.D.C Nawgai
Bajaur Agency

MEDICAL CERTIFICATE

12

Name of Official Mr. Abdul Hadi

Caste or race Muslim/Pakistan

Father's Name S/O/W/O Said Gulab

Residence Village: Maminzo Tehsil Khar Bajaur

Date of Birth 02/05/1986

Exact height by measurement 5-4"

Personal mark of identification _____

Signature of the official [Signature]

Signature of head of office _____

Seal of office [Seal]

I do hereby certify that I have examined Mr. Abdul Hadi a candidate for employment in the office of the District Education Officer Bajaur, Tribal District Bajaur and cannot discover that he had any disease communicable or other constitutional affection or bodily infirmity except _____

I do not consider this as disqualification for employment in the office of _____

District Education Officer, Tribal District, Bajaur

His age according to his own statement is 02/05/1986 years and by appearance about 02/05/1986 years.

[Signature]
MEDICAL SUPERINTENDENT
DHQ: Hospital Khar Bajaur

[Signature]

LEFT HAND THUMB AND FINGER IMPRESSIONS

Government of Pakistan
District Accounts Office Bajaur at Khar
Monthly Salary Statement (February-2019)

13

Personal Information of Mr ABDUL HADI d/w/s of SAID GULAB

Personnel Number: 50439500 CNIC: 2110364971743
 Date of Birth: 02.05.1986 Entry into Govt. Service:

NTTE:
 Length of Service: 00 Years 00 Months 000 Days

Employment Category: Active Temporary

Designation: JUNIOR CLERK

00000016-Min. Of K.A & N.A & S.F.R

DDO Code: BJ0038-UNIVERSITY AND COLLEGES

Payroll Section: 001

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance:

5,160.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 11

Pay Stage: 1

Wage type		Amount	Wage type		Amount
0001	Basic Pay	13,450.00	1000	House Rent Allowance	1,853.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	1,700.00	2148	15% Adhoc Relief All-2013	395.00
2199	Adhoc Relief Allow @10%	455.00	2211	Adhoc Relief All 2016 10%	1,051.00
2224	Adhoc Relief All 2017 10%	1,345.00	2247	Adhoc Relief All 2018 10%	1,345.00

Deductions - General

Wage type		Amount	Wage type		Amount
3011	GPF Subscription - Rs1290	-1,290.00	3701	Benevolent Fund(Exchange)	-180.00
3705	R. Ben & Death Comp(Exch)	-600.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 0.00 Recovered till FEB-2019: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 25,950.00 Deductions: (Rs.): -2,970.00 Net Pay: (Rs.): 23,880.00

Payee Name: ABDUL HADI

Account Number: 7900866603

Bank Details: HABIB BANK LIMITED, 220386 KHAR BAJAUR AGENCY. KHAR BAJAUR AGENCY., BAJAUR

Leaves: Opening Balance: Awaiting: Exempted: Balance:

Permanent Address:

City: EDUCATION DEPARTMENT

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email: abdulhadij24@gmail.com

System generated document in accordance with APPM 4.6.12.9 (SAPCCSUPPORT/26.02.2019/17:15:58v1.1)

* All amounts are in Pak Rupees

* Errors & omissions excepted

(For use in Police Department only).

Note:

Heirs,

- 1) passed SSC examination from BISE malakand under the
- 1. Roll No 6855 session 2007(S). mark obtained 421/900
- 2.
- 3.

Verification Roll No.

dated

received back

- 1) passed HSSC examination from BISE malakand under the Roll No 37744 session 2009 marks obtained 538/1100

Left Thumb Impression

1) passed B.A Examination from university of malakand under the Roll No 23261. Session 2013 marks obtained 214/550 Result declared on 09-sep-2013.

English

Qualification

Date

First Arts

1) passed M.A Examination from university of malakand under the Roll No 1673. Session 2017(A) Result Declared on 4/12/17 obtained 542/1100.

Plan-drawing

B.L. or B.A

Pleadership examination

Training School Final examination

Finger Print

PRINCIPAL
G.D.C Nawgar
Bajaur Agency

Other qualifications

Drill Instructing

Court Duties

Reserve Duties

(3)

(15)

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

Name: Abdul Hadi

Race: Islam

Residence: vil maningz khar p/o and Tehsil Khar District Bajaur

Father's name and residence: Said Gulab

Date of birth by Christian era as nearly as can be ascertained: 09-05-1986
Two may nineteen hundred eighty six


Exact height by measurement: 5-4"

Date


Personal marks for identification: nil


Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger: 

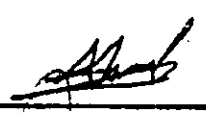
Ring Finger: 

Middle Finger: 


Fore Finger: 



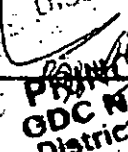
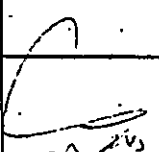
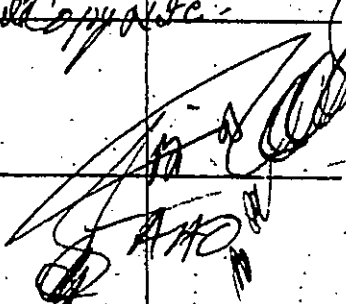
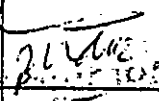
Thumb: 

9. Signature of Government Servant:



10. Signature and designation of the Head of the office, or other Attesting Officer.


PRINCIPAL
G.D.C Nawgal
Bajaur Agency

9 Name and Designation of head of the office or attesting officer (Slut no 1 to 8)	10 Date of termination or appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave.		14 Signature of the office or other attesting officer.	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Period		
 G.D.C. Nawagai District Bajaur	30/11/2018	Service Leave 6 months	 PRINCIPAL G.D.C. Nawagai District Bajaur		Appointed Against the vacant j/c post at GDC Nawagai district Bajaur on BPS-11 (12570-890-387 vide DES EMDST/NC/1527-31 dated-29/10-2018		
 PRINCIPAL G.D.C. Nawagai District Bajaur	30/11/2019	(A) ml					
P						 PRINCIPAL G.D.C. Nawagai Bajaur Agency	
						T-92 14-11-18 S-1 pay paid on- 1-11-20 appl. Fresh mirung the following docuents already ① Appl. order ② medical certificate ③ 100 local copy of order ④ photostatic copy of order ⑤ S-1 	
							Service verified with effect from 1-11-2018 to 30-11-2018 in college record.
							

CHARGE SHEET

(18) Annu-B

I, Mr. Zahoor Ul Haq, Director, Higher Education, Khyber Pakhtunkhwa, as Competent Authority, hereby charge you, Mr. Abdul Hadi, Junior Clerk, Government Degree College Nawagai, (Bajaur) as follows:

That you, while posted as Junior Clerk, Government Degree College Nawagai, (Bajaur) committed the following irregularities: -

- i. That you produced two appointment orders as Junior Clerk from DEO Office dated 28-10-2018 and 29-10-2018 respectively having no record on the diary/dispatch register. Moreover, you took over charge on 01-11-2018 while your salary was initiated from DAO Office on 29-10-2018 with a different personnel number which further raised doubts over the validity of appointment orders.
 - ii. That you were not entitled for appointment under deceased quota as you yourself admitted that your brother had already availed the said quota, hence your order even if allegedly true is not legally right.
 - iii. Perusal of the record revealed that your name was nowhere found in the list of appointment orders issued by DEO under Deceased Quota which further falsified your claim.
 - iv. That your alleged appointment order was issued on 28-10-2018 falling on "Sunday" but you produced another appointment order carrying date 29-10-2018 which unveils your ulterior designs.
1. By reason of the above, you appear to be guilty of misconduct under rule 03 of the Khyber Pakhtunkhwa, Peshawar Govt; Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rule 04 of the Rule ibid.
 2. You are, therefore, required to submit your written defense within seven days of the receipt of this charge sheet to the inquiry officer/committee, as the case may be.
 3. Your written defense, if any, should reach the inquiry officer/committee within the specific period, failing which it shall be presumed that you have no defense to put in and you shall be proceeded exparte.
 4. Intimate whether you desire to be heard in person or otherwise?
 5. A statement of allegations is enclosed.

[Signature]
**DIRECTOR HIGHER EDUCATION
KHYBER PAKHTUNKHWA**

I, Mr. Zahoor Ul Haq, Director, Higher Education, Khyber Pakhtunkhwa, as competent Authority, am of the opinion that Mr. Abdul Hadi, Junior Clerk, Government Degree College, Nawagai (Bajaur) has rendered himself liable to be proceeded against, as he committed the following acts/ omissions, within the meaning of rule 03 of the Khyber Pakhtunkhwa Govt; Servants (Efficiency and Discipline) Rules, 2011.


STATEMENT OF ALLEGATIONS

- i. That he produced two appointment orders as Junior Clerk from DEO Office dated 28-10-2018 and 29-10-2018 respectively having no record on the diary/dispatch register. Moreover, he took over charge on 01-11-2018 while his salary was initiated from DAO Office on 29-10-2018 with a different personnel number which further raised doubts over the validity of appointment orders.
- ii. That he was not entitled for appointment under deceased quota as he himself admitted that his brother had already availed the said quota, hence his order even if allegedly true is not legally right.
- iii. Perusal of the record revealed that his name was nowhere found in the list of appointment orders issued by DEO under Deceased Quota which further falsified his claim.
- v. That his alleged appointment order was issued on 28-10-2018 falling on "Sunday" but he produced another appointment order carrying date 29-10-2018 which unveils his ulterior designs.

1. For the purpose of Formal Inquiry against the said accused with reference to the above allegations, the following Inquiry Officers are hereby nominated under rule 10(1)(a) of the ibid rules.

- i. Dr. Muhammad Nisar,
Professor, Govt: Postgraduate College, Timergara (Dir Lower)
- ii. Saeed Ullah Jan,
Assistant Professor, Govt: Postgraduate College, Timergara (Dir Lower)

- 2. The Inquiry Officer shall, in accordance with the provisions of the Rules, ibid provide reasonable opportunity of hearing to the accused; record his findings and make, within thirty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.
- 3. The accused and a well conversant representative of the department shall join the proceedings on the date, time and place fixed by the inquiry officer/inquiry committee.


(ZAHOOR UL HAQ)
DIRECTOR, HIGHER EDUCATION
KHYBER PAKHTUNKHWA

To

50

Zahoor Ul Haq
Director Higher Education Khyberpakhtunkhwa
Rano Ghari Near Chamkani Mor Peshawar.

In reference to your office letter no.15370-74 I humbly submits as under.

**Para Wise Comment Reply on Behalf on Mr. Abdul Hadi Junior Clerck
GDC Nawagai District Bajaur**

1. With due respect and honor I have produced only one appointment order dated:29/10/2018 in original to the inquiry committee officer the same is on the record of the dispatch register, I have no information and knowledge about the order dated:28/10/2018 nor I have produced the same before the DEO office or any other authority, I also deny the same. Moreover I took charge on dated:01/11/2018 and received the salary from dated:01/11/2018 and only one personal number have been issued to me by DAO office, furthermore I deny the different personal numbers.
2. I being the elder brother and family head been appointed on the deceased sons' quota and was eligible for the same.
3. It is correct that I have been appointed on the deceased son's quota, to this effect the DEO office is testimony to it and my personal file is available in the DEO Office.
4. I deny the allegations leveled against me in the present para. I have no knowledge about the order dated:28/10/2018 which is wrong. I have been appointed vide order dated:29/10/2018 which is correct and the original document is still in my possession, I can produce the same anywhere and whenever required to your good self.

Your's Obedient


Abdul Hadi S/O Said Gulab
Junior Clerck GDC Nawagai

بکھنور جناب انکواری آفیسر بشیر صاحب اینڈ انکواری کمیٹی ہائر ایجوکیشن خیبر پختونخواہ پشاور

چارچ شیٹ مورخہ 10-09-2020 موصول مورخہ 21-09-2020

انگریزی چارجواہات کے علاوہ مزید جوابات

جناب عالی!

سائل حسب ذیل عرض گزار ہے

- 1- سائل عبدالہادی جونیر کلرک GDC ناواگنی ضلع باجوڑ یہ اقرار کر کے لکھ دیتا ہوں کہ میرا تقرری بمورخہ 29-10-2018 کو ہوئے ہیں۔ اور میں نے بمورخہ 01-11-2018 پر چارج سنبھالا ہے اور میں نے 01-11-2018 سے بمطابق ایک پرسنل نمبر پر 50439500 پر تنخواہ وصول کیا ہے۔ مذکورہ آرڈر اور مذکورہ پرسنل نمبر کے علاوہ میرا تقرری آرڈر اور پرسنل نمبر نہیں ہے۔ جو کہ سروس بک رکارڈ پر موجود ہے۔ Pay Roll اور سروس بک کے فوٹو شیٹ لف ہے۔
- 2- جب DEO خاستہ رحمن نے بمورخہ 22-10-2019 مجھ سے میرے تمام اسناد پر پرسنل فائل بھرتی آرڈر سروس بک وغیرہ طلب کیے۔ تو پرسنل GDC ناواگنی نے میرے ساری کاغذات مذکورہ بمطابق لیٹر نمبر 1648 مورخہ 30-10-2019 کو DEO خاستہ رحمن کو بھیجا دیئے ہے۔ فوٹو شیٹ لف ہے۔
- 3- یہ کہ DEO خاستہ رحمن اور پرسنل GDC ناواگنی عبدالحق نے باہمی ملی بھگت سے مجھ سے بالترتیب ایک لاکھ اور 60000 ہزار روپے بطور رشوت وصول کئے ہیں۔ موبائل ریکارڈنگ میرے ساتھ محفوظ ہے۔ جو کہ ریکارڈ پر موجود ہے۔
- 4- یہ کہ میرا بھرتی آرڈر نمبر 31-1527 مورخہ 29-10-2018 جو کہ صحیح اور درست ہے۔ جب کہ DEO خاستہ رحمان نے انڈوسمنٹ نمبر میں ردوبدل Tempering کیا ہے۔ یعنی 11/11/2018 کے بعد اس نے اڈالا ہے جو کہ غلط ہے۔
- 5- یہ کہ جو 28-10-2018 والا آرڈر فوٹو شیٹ کا پی DEO خاستہ رحمن کا جعلی طور پر تیار شدہ ہے۔ اگر یہ صحیح ہے تو اس کے اصل کا پی یعنی اور پینل کا پی مجھے دکھائے۔
- 6- یہ کہ بمورخہ 11-07-2020 میرے رپورٹ پر انکواری ہوئے ہیں جس کو DEO خاستہ رحمن حاضر نہیں ہوا ہے۔ پس DEO خاستہ رحمن حاضر ہو کر بیان حلفی دیں۔ اور قرآن پر قسم اور طلاق ثلاثہ دیں کہ میں نے انڈوسمنٹ نمبر میں ردوبدل نہیں کیئے ہیں۔ جعلی طور پر خود تیار کئے ہیں۔
- 7- یہ کہ خاستہ رحمن نے 1527 سے لیکر 1542 تک 14 نمبروں کو ڈسپنچ رجسٹر میں خالی چھوڑا ہیں۔ یعنی 14 نمبروں کو درمیان میں مس کیا ہے جو کہ ڈسپنچ رجسٹر کو انکواری آفیسر بشیر صاحب نے اور انکواری کمیٹی نے چیک کئے ہیں۔ ڈسپنچ رجسٹر کے فوٹو شیٹ لف ہے۔
- 8- یہ کہ میں اپنے بھائیوں میں سب سے بڑا ہوں اور مرحوم کوٹہ پر میں نے 2010 سے لیکر 2018 تک درخواست جمع کئے ہیں۔ جو کہ دفتری ریکارڈ میں ڈسپنچ کوٹہ کے فائل پر موجود ہے۔ اور یہ بھرتی پہلا میرا حق بنتا ہے۔ لہذا انصاف کا خواستگار ہوں۔

Handwritten signature and date: 23-09-2020

عبدالہادی جونیر کلرک گورنمنٹ ڈگری کالج ناواگنی ضلع باجوڑ

21103-6497174-3

شناختی کارڈ نمبر

0302-8196968

موبائل نمبر

Date: 23-09-2020



(22)

**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI NEAR CHAMKANI MOR, PESHAWAR**

E-mail:- dhekpkes@qmail.com Facebook.com/dhekpkes Peshawar Twitter.com/dhekpkes Peshawar1

No: /CA-VII/Estt: Branch/GDC, Nawagai

Dated Peshawar the 10 / 9 / 2020

To

1. Professor Dr. Muhammad Nisar,
Govt: Postgraduate College, Timergara (Dir Lower).
2. Assistant Professor Mr. Saeed Ullah Jan,
Govt: Postgraduate College, Timergara (Dir Lower).

SUBJECT: INQUIRY AGAINST MR. ABDUL HADI, JUNIOR CLERK (BPS-11), GOVT: DEGREE COLLEGE, NAWAGAI, BAJAUR.

Respected Sir, السلام عليكم

I am directed to refer to the subject cited above and to enclose herewith charge sheet and statement of allegations in r/o Mr. Abdul Hadi, Junior Clerk Government Degree College, Nawagai (Bajaur) to be served on the accused official and to state that Director, Higher Education, Khyber Pakhtunkhwa is pleased to appoint you as Inquiry Officer/Inquiry committee in the captioned case.

It is, therefore, requested to conduct a formal inquiry in the matter and Inquiry report thereof alongwith clear cut recommendations be sent to this office within a week positively

(Muhammad Iftikhar)
DEPUTY DIRECTOR

Endst. No. 15370-74 / CA-VII/Estt: Branch/GDC Nawagai

Copy of the above is forwarded for information to the:

1. Principal, Government Degree College, Nawagai (Bajaur).
2. Mr. Abdul Hadi, Junior Clerk, Government Degree College, Nawagai (Bajaur) alongwith a copy of charge sheet/statement of allegations with the direction to appear before the inquiry committee on the date, time and venue fixed by the inquiry committee.
3. PA to Directorate of Higher Education, Khyber Pakhtunkhwa, Peshawar.
4. Assistant Director (Litigation), Local Directorate.
5. Superintendent Promotion Cell, Local Directorate.

Received on 21-09-2020

[Signature]
21-09-2020

(Muhammad Iftikhar)
DEPUTY DIRECTOR

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To,

The Director Higher Education
Khyber Pakhtunkhwa Peshawar.

Subject: **INQUIRY AGAINST MR. ABDUL HADI JUNIOR CLERK (BPS-11)
GDC NAWAGAI ,BAJAQUR.**

Respected Sir, Assalamu Alakum,

Reference to your office letter No.15368-69 CA-VII/Estt: Branch/GDC, Nawagai Dated Peshawar the 10.09.2020. The undersigned visited GDC Nawagai, office of the District Education Officer Khar Bajour, District Accounts Office Khar Bajour on 22.9.2020 and conducted fact finding inquiry against Mr. Abdul Hadi Junior Clerk of GDC Nawagai District Bajour. Report of the inquiry is hereby submitted for your kind perusal and further necessary action please.

FINDINGS

- 1 Mr. Said Gulab (the Late) Father of Mr. Abdul Hadi Junior Clerk was working as Head Master at Govt: High School Topmandal (Bajour) and died on 28.06.2006 during Government service. His son Mr. Fazal Hadi was appointed as Junior Clerk in BPS-07 against the deceased quota by the Agency Education Officer Bajour Agency Vide Endst: No.10779-84 Dated 15.02.2011, and now serving as Junior Clerk at GGDC Jandool District lower Dir.(Page:1-3)
- 2 Mr. Abdul Hadi submitted an application to the Political Agent Bajour on 23.1.2018 for appointment as Junior Clerk against the deceased quota. He also admitted that his younger brother i.e. Mr. Fazal Hadi has already availed the said quota. The Political Agent forwarded his application to the Agency Education Officer Bajour with a covering letter No.793/2/4/ Acctt Dated 03.01.2018 for necessary action as per rules(Page:4-5)
- 3 Consequently, Mr. Abdul Hadi was appointed as Junior Clerk against the deceased quota by Mr. Amrullah Wazir District Education Officer District Bajour Vide Endst: No.1527-31 Dated 28.11.2018(Sunday). It is worth mentioning that another appointment order of Mr. Abdul Hadi as Junior Clerk against the deceased quota has also been issued on 29.10.2018 bearing the same Endst No. with the same signature which make the case ambiguous, complicated and fake(Page: 6-7)
- 4 It was observed that the above mentioned Endst:No.i.e.1527-31 dated 29.10.2018 was allotted to the GPF case of another employee of the education Department namely Saleh Muhammad in the dispatch register of District Education Office Bajour and no record of Mr. Abdul Hadi's appointment as Junior Clerk was traced in any document of DEO office Bajour(Page:8-11)
- 5 The undersigned also visited and checked the District Accounts Office Bajour and carefully examined the available record in computer section. It was disclosed by

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Handwritten signature and date 26/10/20

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Entry #	Page #

Mr. Hasham Ali Senior Auditor that the salary of Mr. Abdul Hadi Junior clerk was released from 29.10.2018 and punched on 23.11.2018 by Mr. Biland Assistant Accounts Officer under a single personal no.50439500. On the other hand Mr. Abdul Hadi has taken the charge against the vacant post of Junior Clerk at GDC Nawagai on 1.11.2018 Vide District Education Officer Bajour Endst: No.1527-31 dated 29.10.2018(Page:12-19)

- 6 Mr. Abdul hadi has submitted a written defense before the inquiry committee against the charges leveled against him and claimed that his appointment order was issued on 29.10.2018 and took over the charge on 1.11.2018. He blamed Mr. Khaista Rahman DEO Bajour for tempering in his service documents but could not produce solid proof in support of his claim. Moreover, he admitted that his younger brother i.e. Mr. Fazal Hadi has already utilized the deceased quota(Page:20-21)


CONCLUSION

It may be concluded from findings that:

- 1 Mr. Fazal Hadi S/O Said Gulab (the Late)/Brother of Mr. Abdul hadi has already availed the deceased quota in 2011 and presently serving as Junior Clerk at GGDC Jandool District Lower Dir.
- 2 There are two appointment orders of Mr. Abdul Hade's appointment as Junior Clerk bearing the same Endst:No .i.e. 1527-31 and same signature with different dates i.e. 28.10.2018(Sunday) and 29.10.2018 respectively .However ,the said Endst: No. and date i.e.29.10.2018 in the dispatched register has been allotted to the GPF case of Mr. Saleh Muhammad and his name is not existed in the dispatched register of DEO office. Moreover, Mr. Abdul Hadi's name is not included in the list of appointment made under deceased quota during 2018.
- 3 As per record of District Accounts Office Bajour, the pay of Mr. Abdul hadi was released from 29.10.2018 while he had taken his charge of duty with effect from 1.11.2018.Hence; there is a contradiction between the date of taking over charge and release of pay.

RECOMMENDATIONS

In the light of the findings of the present inquiry and documentary evidences, all charges leveled against the accused Abdul Hadi have been proved to be true. He has violated E&D rules 2011 and is guilty of misconduct. He is therefore, recommended for major penalty under the efficiency and discipline rules 2011.

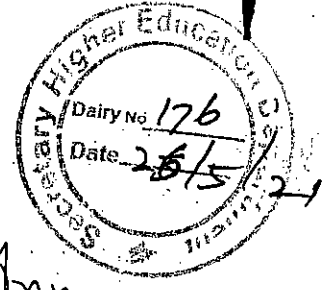


Saeedullah Jan
Assistant Professor
GPGC Timergara Lower Dir



(Prof: Dr. Nisar Ahmad)
GPGC Timergara Lower Dir

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To
The Secretary Higher Education.
Khyber Pakhtunkhwa
Peshawar

Subject: DEPARTMENTAL APPEAL against the order bearing Endst: 6259-61 / GDC Nawagai dated 18/03/2021 whereby the penalty of "removal from service along with recovery of salaries drawn by him in the capacity of Junior Clerk" was imposed.

Respected Sir,

I very humbly submit the following few lines for your kind and sympathetic consideration.

- 1- That I was appointed as Junior Clerk vide order dated 29/10/2018 against the Employees Sons Quota.
- 2- That in compliance of the above order I submitted my arrival report and took charge of my Duties on 01/11/2018. as such since my appointment I perform my duties efficiently. It is pertinent to mention here that my salary was started/released from 01/11/2018.
- 3- That during my service effect finding inquiry was conducted and consequently a so called former inquiry was ordered /conducted and imposition of major penalty of removal from service was recommended against me.
- 4- That consequently vide the subject cited above order dated 18/03/2021 the major penalty of "removal from service along with recovery of salaries drawn by him in the capacity of Junior Clerk" was imposed against me, with immediate effect.
- 5- That I am innocent and has erroneously been found guilty of misconduct.

- 6- That I have clear cut service record and despite a valid and legal appointment dated 29/10/2018 I have been removed from service on an ambiguous and vague inquiry.
- 7- That the dairy and dispatch register have been tempered/ reconstructed illegally, malafiedly and unjustly to make a room for passing / supporting and illegal order against me.
- 8- That a Photostat copy of the alleged order dated 28/10/2018 have been relied malafidely and a legal and correct order dated 29/10/2018 (which has been acted upon in all the relevant / concerned offices) have been done away with and has been falsified wrongly.
- 9- That despite the fact that tempering in the dispatched register is very much clear and evident, the same has not been considered by the inquiry committee / officers and thus have come to a wrong conclusion while submitting a so called inquiry report. It is pertinent to mention here that the dispatch register have been shown to have closed (And that too by a clerk of the DEO Office) at Serial No.1527 dated 29/10/2018 and have shown to have started from serial No.1542 -46 dated 30/10/2018.
- 10- That I have not been treated in accordance with law and no chance of proper cross examination of the witnesses provide to me.

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11- That the imposition of penalty against me is against the law, rules, regulations, facts and circumstances of my case and therefore, requires the interference of your good office, hence the instant appeal / representation.

It is, therefore, most humbly prayed that on acceptance of the instant departmental appeal, the impugned order dated 18/03/2021 may kindly be set aside/ varied and I may please be exonerated of all the charges leveled against me, so that I could continue my duties.

Dated 26/05/2021

Yours Obediently



Abdul Hadi
Son of Said Gulab
Resident of Maminzo P.O Khar
Tehsil Khar District Bajaur
CNIC # 21103-6497174-3
Cell # 0302-8196968



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

Phone No. 9213501-2 Ext.20 Fax #091-9210368

32

Amir D

No.SO(C-IV) HED/19-7/Abdul Hadi/Junior Clerk/2021
Dated Peshawar the 2nd August, 2021.

To

The Director,
Higher Education, Khyber Pakhtunkhwa

Subject:

DEPARTMENTAL APPEAL AGAINST THE ORDER BEARING ENDST: 6259-61/GDC NAWAGAI DATED 18.03.2021 WHEREBY THE PENALTY OF "REMOVAL FROM SERVICE ALONG WITH RECOVERY OF SALARIES DRAWN BY HIM IN THE CAPACITY OF JUNIOR CLERK" WAS IMPOSED.

I am directed to refer to your letter No. 3819/CA-VII/Estt: Branch/A-167/GDC Nawagai dated 07.07.2021 on the subject noted above, and to state that the subject appeal may be filed and criminal procedure may also be initiated under Section-420 of Pakistan Panel code 1860 (copy enclosed), against Mr. Abdul Hadi, Ex-Junior Clerk, Govt. Degree College, Nawagai Bajaur, please.

Encl: as above

SECTION OFFICER (C-IV)

Endst; No.& Date as above.

Copy to the:-

1. PS to Secretary, Higher Education Department.
2. Master file.

SECTION OFFICER (C-IV)

REGISTER OF LETTERS DISPATCHED

32/A Annex - B
(روزنامہ ڈاک اجراء)

FOLIO (37)

ISSUE NO. (نمبر)	DATE (تاریخ)	NAME & DESIGNATION (نام و عہدہ)	PLACE (مکان)	SUBJECT (موضوع)	FILE HEAD & NO. (فائل سربراہ و نمبر)	STAMPS RECEIVED (درجہ شدہ ختمات)	STAMPS USED (معمولاً استعمال شدہ ختمات)	REMARKS (توضیحات)
1527	29/10/18	D.A.O. Bajaur	B	G.P.F. Mr. Saleh Muhammad				
<p><i>Closecd. on 29/10/2018</i> <i>Amrullah Khan Wazir</i> <i>TRANSFERRED.</i></p> <p style="text-align: right;">District Education Officer Bajaur</p>								

1542-46	30/10/18	To All concerned		charge Report Sultan Muhammad Amrullah (38)				
1547-52	"	To All concerned		Specimen Signature of DFO - Sultan Muhammad				
1553	"	DE NMD Peshawar		Add: Grant of TA				
1554	31/10/18	" " "		L.P.R. Gul Jan N/Qasid Badan				
1555-59	31/10/18	To All concerned		Reliving chit in R/O Amrullah Khan				
1560	1/11/18	Lubna A.D.S.O (F)		Doc G.P.F. Mian Killat				
1561-66	1/11/18	To All concerned		Minutes of meeting Principal/H/M/H/Mistress				
1567	2/11/18	" " "		Release of Salaries for the month of 9/2018				
1568-69	"	" " "		Pension papers Jam Jadd. Ex-SST. T. Charn				
1570	"	DE NMD KPK Pesh		" " "				
1571-75	"	To All concerned		Transfer Order				
1576-77	"	" " "		Cancellation of mutual Transfer				
1578	"	Shah Ali Khan		Explanation				
1579-82	"	To All concerned		do				
1583	"	Ikramullah		show cause				
1584-86	"	To All concerned		do				
1587	"	Faqir Muhammad		Show cause				
1588-90	"	To All concerned		do				
1591-93	5/11/18	To All concerned		Cancellation/Withdrawal Order				
1594-97	"	To All concerned		Transfer Order Miss Shamim Saad				
1598	"	DE NMD KPK Pesh		Staff Statements of School				
1599	6/11/18	" " "		Appeal				
1600-01	"	To All concerned		" " F. Rahim				

کثرت خراب ایجنسز اور کوششیں آئینہ صاحب باجوڑ

عوام کو آئی سی پی سی

عقبات

موردہ باندھنا شروع ہے۔

آئینہ صاحب کا والد صاحب کو آئینہ صاحب میں ہندو ماہی کے

پوسٹ پر خدمت سر انجام دے رہا تھا۔ چونکہ

ہندو کا والد صاحب سوہی کے دوران لکھنؤ کے ال

مقامات چلے گئے۔ گوئیہ ڈیپارٹمنٹ ڈائری ہندو اور ال

چونکہ ہندو FA کو آئینہ صاحب سے آئی سی پی سی کے افعال اور لوگوں

اس سے آگاہ ہے۔ اور اس نے لکھنؤ کے دور میں روزنامہ

لکھا ہے صاحبان نے کہا ہے کہ ہندو کو Diseases کی باتیں کرتے ہیں

جو کہ لکھنؤ کے روزنامہ کے اخباری قاریوں

کا ہے۔ ان کے بعد ایسی ہی وہ سید طالب مرحوم

نے لکھا ہے کہ

AGSST
for
complaints

19/2/2013

حساب

عنوان: درخواست برائے تعیناتی جوئیر کلرک

موزبانہ گزارش کی حاجت ہے۔ کہ سیدہ کا والد ایجوکیشن ڈیپارٹمنٹ

میں بطور ہیڈ ماسٹر پوسٹ پر ہی ایچ ایس ایچ لٹریچر ماڈل میں فرائض سرانجام دے رہے تھے۔

اور دوران سروس وفات پا گیا۔ اور سیدہ نے ڈیپنٹی کوٹہ میں رولز کے مطابق

2010 میں نوکری کیلئے درخواست دیا تھا۔ لیکن اس وقت کے AEO نے میرے

پھوٹے کھان جو بھرتی کیا۔ جو سیدہ کے ساتھ سر اسر بالفان ہے۔ ESTA جوڈ

رولز کے مطابق یہ سیدہ کا حق بنتا تھا۔ دو پہلے پہلے سیدہ نے AEO

کو اپیل کیا تھا۔ لیکن تا حال ٹھون کا وہاں عمل میں نہیں لائی گئی۔

لہذا آپ صاحبان میرا بن کر کے سیدہ کو جوئیر کلرک پر تعیناتی کا حکم

صادر فرمائیے۔

Dated: 23/1/2015

المدیر

ایڈفلس عبدالباری ولد سید ظاہر غزنی ترقی ترغاد تحصیل سرتنگ باجوڑ (جنوبی)

Enclosed.

1. Death Certificate.
2. Service Certificate.
3. Application of 2010 TO AEO Bajaur.
4. Documents (Educational).

Act
 PAB
 25/1/15

Known as Mr. Subir

973
 30/1/18

OFFICE OF THE POLITICAL AGENT
 BAJAUR AGENCY



District Education Officer
35 Bajaur at Khar

No. 9374 Dated 22/10/2010
Email: aeobajaur@gmail.com Voice & Fax: 929822203

To

Principal
GDC Nawagai Bajaur.

Subject: PROVISION SERVICE DOCUMENTS.

Memo;

Reference to the subject cited above, it is ~~stated that~~ the service documents i.e appointment order, service ~~book and~~ other related documents of Mr. Abdul Hadi Junior ~~Clerk~~ working under your jurisdiction may be provided.


District Education Officer
Bajaur

(35)

**District Education Officer
Bajaur at Khar**

No.9374 Dated 22/10/2019

Email aeobajaur@gmail.com

Voice & Tax +92942220395

To

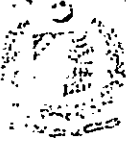
Principal
GDC Nawagai Bajaur.

Subject: **PROVISION OF SERVICE DOCUMENTS**

Memo;

Reference to the subject cited above, it is stated that the service documents i.e. appointment order, service book and other related documents of Mr. Abdul Hadi Junior Clerk working under your jurisdiction may be provided.

Sd/-
District Education Officer
Bajaur



~~Annexure B~~

(36)

OFFICE OF THE PRINCIPAL
GOVT. DEGREE COLLEGE
Nawagai District Bajaur,
Pakistan

no 1648

Date: 30/10/2019

To

The District Education Officer
Bajaur.

Subject: Provision of Service Documents

Memo:

Reference to your letter No 9374 dated 22/10/2019 on the subject cited above. The requisite documents prepared by Mr. Abdul Raziq junior clerk of CDC Nawagai have been submitted to your office.

[Signature]
Principal
Govt. Degree College
Nawagai District Bajaur

**OFFICE OF THE PRINCIPAL
GOVT. DEGREE COLLEGE**
*Nawagai District Bajaur,
Pakistan*

No.1648

Dated: 30/10/2019

To

The District Education Officer
Bajaur.

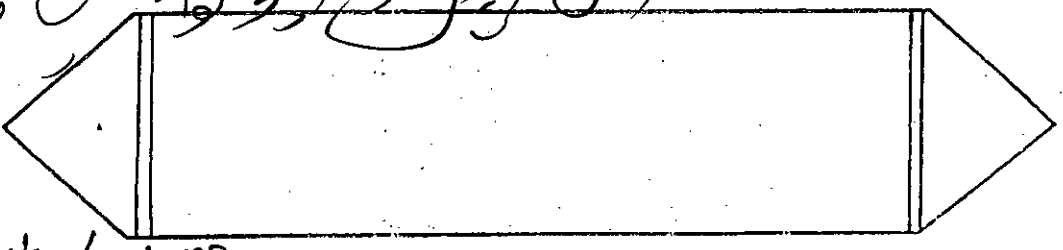
Subject: Provision of Service Documents

Memo:

Reference to your letter No: 9374 dated 22/10/2019 on the subject cited above, the requisite documents in respect of Mr. Abdul Hadi junior clerk of GDC Nawagai is here by submitted to your office.

Sd/-
Principal
GDC Nawagai
District Bajaur

بعدالت سروس سپریمیل صدر کی درخواست



2022ء منجانب ایس ڈی

بنام سکریٹری عدالت

عدالت عالیہ

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی ہوگی کل کارروائی متعلقہ آن مقام کیلئے عبد اللہ علی احمد مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ برحلف دیئے جواب دی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک دروپیا عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی 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 مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔ 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۔

المرقوم 22 ماہ 2022

واہ العی

کے لئے منظور ہے۔

مقام
attested &
accepted

Handwritten notes and signatures on the right margin, including the name 'Sikandar' and other illegible text.

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No: 7351/2021

Mr. Abdul Hadi..... Appellant


Versus

Govt. of Khyber Pakhtunkhwa
Through Secretary, Higher Education
& others.....

Respondents

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Respondent

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**BEFORE THE HONOURABLE KHYBER PAKHTUN KHWA SERVICE TRIBUNAL
PESHAWAR**

S.A # 7351/2021

Mr. Abdul HadiAppellant

Versus

Govt. of Khyber Pakhtunkhwa
Through Secretary Higher Education Peshawar
& others Respondents

SUBJECT: PARAWISE COMMENTS ON BEHALF OF RESPONDENTS NO. 1 to 6

Respectfully Sheweth:-

Preliminary Objections:-

1. That the appellant has got neither cause of action nor locus standi to file the instant Service appeal.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That the appellant is trying to conceal material facts.
4. That the appellant is estopped by his own conduct to file the instant service appeal.
5. That the instant Service Appeal is badly time-barred.
6. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
7. That the appellant has produced fake appointment orders dated: 28-10-2018 & 29-10-2018.

Reply on Facts:-

1. Incorrect. That the appellant was not appointed as Junior Clerk, rather he produced fake appointment orders dated: 28.10.2018 and 29.10.2018(**Annex-A**)
2. Incorrect. That the appellant took charge as Junior Clerk on 01.11.2018 at Govt; Degree College, Nawagai Bajaur on the basis of his fake appointment order.
3. In reply it is stated that Respondent No. 04 (District Education Office, Bajour) vide letter dated: 22-10-2019 requested respondent No.0 6 (Principal, Govt; Degree College, Nawagai Bajaur) to provide service documents including appointment order of the appellant (**Annex-B**) Principal provided all other documents except the appointment order as the same was not available in college. Respondent No. 6 vide letter dated: 16.12.2019 directed the appellant to provide the appointment order (**Annex-C**) but instead of providing the order, the appellant recorded on the body of letter charges accusing the respondent No. 04 for taking bribe. (**Annex-D**) The respondent no. 6 vide letter dated: 04.01.2020 informed the office of respondent No. 2 and on the direction of respondent No. 2, fact finding inquiry was conducted (**Annex-E**) wherein the inquiry officer recommended to

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initiate disciplinary proceedings against the appellant under E&D Rule, 2011. (Annex-F).

Inquiry committee was constituted (Annex-G), statement of allegation, charge sheet was served upon the appellant wherein all the allegations were proved against the appellant and the inquiry committee recommended to impose major penalty upon the appellant. (Annex-H) After fulfilment of all codal formalities, the competent authority imposed major penalty of Removal from Service upon the appellant along with recovery of salaries vide Notification dated: 18.03.2021 (Annex-I)

4. Correct to the extent that major penalty of removal from service was imposed upon the appellant along with recovery of salaries. Detail reply is given in Para 3 ibid.
5. Correct to the extent that the appellant filed time barred departmental appeal dated: 26.05.2021 which was filed vide letter dated: 02.08.2021 (Annex-J) and directions were given to initiate criminal proceedings against the appellant. Respondent No. 2 & 6 accordingly wrote letter No. 19415 dated: 08-09-2021, No. 2338, No. 27917 dated: 25-11-2021 & letter No. 2449 dated: 15-02-2021 to District Police Officer, Bajaur to lodge FIR against the appellant u/s 240 PPC (Annex-K).
6. That the appellant has no locus standi and cause of action to file the subject appeal.

Reply on Grounds:

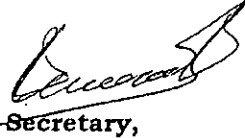
- A. Incorrect. The orders are in accordance with Law and rules. (Annex-K).
- B. Incorrect. The orders are passed as per procedure, Law/rules.
- C. Incorrect. All allegations/charges against the appellant have been proved.
- D. Incorrect. The appellant is trying to mislead the Hon'ble Tribunal. The appellant produced two fake appointment orders dated: 28-10-2018 and 29-10-2018. He initially claimed appointment order dated: 28-10-2018 but during the visit of inquiry officer to District Education Office, it transpired from Diary/Dispatch Register that it was Sunday on 28-10-2018 (Annex-L) and not a single letter has been issued on that date. On query, the appellant produced another appointment order dated: 29-10-2018 but again, no such order was issued from District Education, Officer, rather the Diary/Dispatch register showed that letter No. 1527 was issued on 29-10-2018 in respect of Mr. Saleh Muhammad GP, fund case. (Annex-M). It is pertinent to mention here that father of the appellant was Headmaster and died during the service. After his death, his son namely Fazal Hadi (brother of the appellant) was appointed as Junior Clerk against deceased Son quota at Govt; High School, Kamadara, Barang Bajour vide order dated: 15.02.2011 (Annex-N). As per section 10(4) of APT, Rules one of the children of the deceased is entitled for

appointment (Annex-O). In the instant case, brother of the appellant has already availed Son Quota which is also evident from the application of the appellant.

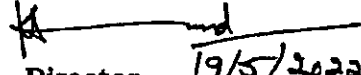
- E. Incorrect. As already explained in preceding para No. D. Moreover, this Para is subject to proof by the appellant.
- F. Incorrect. A list of appointments made under deceased Quota was maintained by the District Education officer and his name is also not present in that list. (Annex-P)
- G. Incorrect. As already explained in preceding Paras.
- H. Incorrect. As already explained in preceding para. There is no record of the referred letter in District Education Office.
- I. Incorrect. As already explain in preceding para D.
- J. Incorrect. The appellant has been treated within four corners of Law. Proper statement of allegations, charge sheet, show cause notice was served upon the appellant and personal hearing was accorded/fixed on 01.01.2021 and 25.11.2021. (Annex-Q)
- K. Incorrect. Appellant was provided full chance of cross examination.
- L. That the respondents may be allowed to raise additional grounds at the time of arguments.

Prayer:-

It is, therefore, humbly prayed that the instant Service Appeal is based on misconception/misstatements, hence may graciously be dismissed.

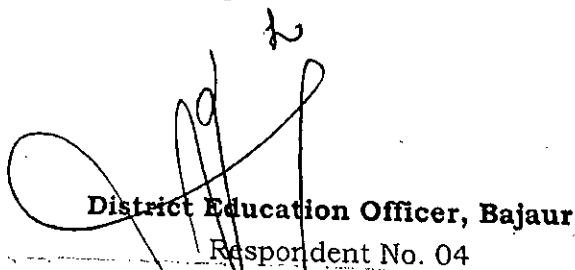


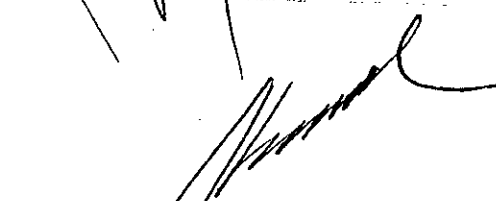
Secretary,
Higher Education, Archives
& Library Department
Respondent No. 01


Director 19/5/2022
Higher Education, Department
Respondent No. 02



Deputy Director (Estb.)
Higher Education,
Khyber Pakhtunkhwa
Respondent No. 03


District Education Officer, Bajaur
Respondent No. 04


Principal,
Govt; Degree College, Nawagai
Respondent No. 06

Principal
GDC Nawagai
Distt: Bajaur



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**OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT BAJAUR AT KHAR.**

APPOINTMENT ORDER

Mr, Abdul Hadi s/o Late Said Gulab is hereby appointed against the vacant junior clerk post (Deceased) at Govt Degree college nawagai District Bajaur purely on temporary base in BPS 11 (12570- 880-38970) plus usual allowances as admissible under the rules in the light of establishment division islamabad letter No: 7/40/2005-E2, dated 13/6/2006 and FATA secretariat Directorate of Education Peshawar letter No: 7839-85, Dated 26/07/2016 in the interest of public service.

TERMS/ CONDITIONS:

1. The appointment of the candidate is made purely on temporary basis & liable to termination at any time without assigning any reason.
2. Charge report should be submitted to all concerned in duplicate.
3. All kind of documents should be verified from the concerned institution before the drawl of his salary.
4. Health and age certificate produced to this office to be obtained from the agency surgeon concerned.
5. His age should be according to the Govt policy.
6. If the failed charge report of the arrival within 15 days the appointment order will be automatically considered as cancelled.

(AMRULLAH WAZIR)
District Education Officer
District Bajaur

Endst: No 1527-31 Dated 28/10/2018

Copy of the above is forwarded to the:

1. Director of education newly merge districts Peshawar.
2. District accounts officer bajaur tribal district.
3. Accountant of the local office.
4. Principal GDC Nawagai District Bajaur.
5. Official concerned.

Amrullah
District
Education Officer Bajaur.

A1

(6)

OFFICE OF THE DISTRICT EDUCATION OFFICER
DISTRICT BAJAUR AT KHAR.

POINTMENT ORDER

Mr, Abdul Hadi s/o Late Said Gulab is hereby appointed against the vacant junior clerk post (Deceased) at Govt Degree college nawagai District Bajaur purely on temporary base in BPS 11 (12570- 880-38970) plus usual allowances as admissible under the rules in the light of establishment division islamabad letter No: 7/40/2005-E2, dated 13/6/2006 and FATA secretariat Directorate of Education Peshawar letter No: 7839-85, Dated 26/07/2016 in the interest of public service.

TERMS/ CONDITIONS:

1. The appointment of the candidate is made purely on temporary basis & liable to termination at any time without assigning any reason.
2. Charge report should be submitted to all concerned in duplicate.
3. All kind of documents should be verified from the concerned institution before the drawl of his salary.
4. Health and age certificate produced to this office to be obtained from the agency surgeon concerned.
5. His age should be according to the Govt policy.
6. If the failed charge report of the arrival within 15 days the appointment order will be automatically considered as cancelled.

(AMRULLAH WAZIR)
District Education Officer
District Bajaur

Endst: No 1527-31 Dated 29/10/2018

Copy of the above is forwarded to the:

1. Director of education newly merge districts Peshawar.
2. District accounts officer bajaur tribal district.
3. Accountant of the local office.
4. Principal GDC Nawagai District Bajaur.
5. Official concerned.

Amrullah
District
Education Officer Bajaur.



B 7
District Education Officer
Bajaur at Khar

No. 9371 Dated 22/1/20
Email ajob@gov.pk Voice & Fax 929-22000

To

Principal
GDC Nawagai Bajaur.

Subject: PROVISION SERVICE DOCUMENTS.

Memo;

Reference to the subject cited above, it is stated that the service documents i.e appointment order, service book and other related documents of Mr. Abdul Hadi Junior Clerk working under your jurisdiction may be provided.

[Signature]
District Education Officer
Bajaur.

[Signature]
Lubana

OFFICE OF THE PRINCIPAL
GOV'T DEGREE COLLEGE
Nawagai District Bajaur,
Pakistan

8
No. 672

Dated: 16/11/2019

To:

Abdul Hadi J.C.
GDC Nawagai Bajaur.

Subject: Provision Of appointment Order

Memo:

Reference to the subject cited above, you are hereby ordered to prepare your initial appointment order within 24 hours immediately.

Naqvi
Principal
GDC Nawagai District Bajaur

No: 672/B dated: 16/11/2019.

Copy forwarded to DEO Bajaur for information.

Principal
GDC Nawagai District Bajaur

Tubana



OFFICE OF THE PRINCIPAL
GOV'T DEGREE COLLEGE
Nawagai District Bajaur,
Pakistan

No 1672/23
Dated: 16/12/2019

To:
Abdul hadi J.C
GDC Nawagai Bajaur.

DW 3/III

Subject: Provision Of appointment Order

Memo:

Reference to the subject cited above, you are hereby ordered to provide your initial appointment order within 24 hours. Otherwise a strict disciplinary disobedience action will be taken against you.

[Signature]
Principal
GDC Nawagai District Bajaur

Principal
G.D.C. Nawagai
District Bajaur

No: dated: 16/12/2019.

Copy forwarded to DEO Bajaur for information.

[Signature]
Principal
GDC Nawagai District Bajaur

~~M. I. Khan, Rushman, B. No. 1, High Court~~
~~District Education Officer - P. No. 1.~~
~~Retired - before - Two LDC amount of~~
~~Rs. 200000/- after discuss this~~
~~oflect taking kindly - 17/12/19~~

[Signature]



**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI NEAR CHAMKANI MOR, PESHAWAR**

E-mail:- dhekpsh@gmail.com Facebook.com/dhekpshawar Twitter.com/dhekpshawar1

No. 5539 / CA-VIII/Estt: Branch/GDC Nawagai Dated Peshawar the 26/2 /2020

15a

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Scanned with CamScanner

To
The Deputy Director Establishment,
Directorate of Higher Education,
Khyber Pakhtunkhwa.

SUBJECT: APPOINTMENT ORDER OF MR. ABDUL HADI JUNIOR CLERK

Respected Sir, ^{مقام محترم}

I am directed to enclose herewith letter No.1690 dated 04-01-2020 and to state that Director, Higher Education Khyber Pakhtunkhwa is pleased to appoint you as Inquiry Officer in the captioned case & direct you to conduct a fact-finding inquiry into the matter of alleged non-compliance of Mr. Abdul Hadi, Junior Clerk with the directives issued to him by the Principal concerned.

It is therefore requested that Inquiry report along with clear cut recommendations be sent to this office within a week positively, please.

Encl: As Above:

(Muhammad Istikhar)
26/2/2020
DEPUTY DIRECTOR

OIC

Endst.No 5533-37 / CA-VIII/Estt: Branch/GDC Nawagai

Copy of the above is forwarded for information to the:

1. Section Officer (C-IV), Higher Education Department, Khyber Pakhtunkhwa.
2. Principal, Government Degree College, Nawagai (Bajaur).
3. Deputy Director (IT), Local Directorate, with the remarks to circulate the same electronically.
4. Assistant Director (Litigation), Local Directorate.
5. Superintendent Promotion Cell, Local Directorate.

(Signature)

(Muhammad Istikhar)
26/2/2020
DEPUTY DIRECTOR

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11

OFFICE OF THE PRINCIPAL
Govt Degree College
Nawagai District Bajaur,
Pakistan

No. 1690

Dated: 04/01/2020

To..

The Director of Higher Education
Khyber Pakhtoon Khawa Peshawar.

Handwritten signature and date:
09/01/2020

Subject: Appointment Order of Mr. Abdul-
Hadi Junior Clerk.

Memo:

It is stated for your kind honor that one Mr. Abdul hadi was appointed as Junior Clerk by the Agency Education Officer Khar Bajaur and posted him at GDC Nawagai vide his order Endst No: 1527-31 Dated 29/10/2018 and give him charge by the Ex- Principal Professor S M Fayaz of this college w.e.f 01/11/2018 (copy attached). In this connection it may be pointed out that after lapse of one year the DEO of Bajaur asked this office regarding production of service documents i.e. original appointment order, service book, charge report etc, vide his letter No: 9374 Dated 22/10/2019 (copy attached), for which the official concerned was asked through letter No: 1672-73 Dated 16/12/2019 (copy attached) to provide documents order charge report etc within 24 hours time, He provided only Charge report and Service Book except appointment order and the same has been sent to the concerned Office, but the appointment order was not provided by him and the concern Clerk give his remarks on the body of the letter noted by him (copy attached).

The undersigned also asks the DEO Bajaur to trace out the record and check the Endst No and date in the appointment order of the above name official, wither the order is correct or otherwise.

Hence the information for non production of appointment order record by the above name official is brought to your kind notice for favorable consideration and also directed the said clerk to do the needful without waste of time and also guided him the undersigned for proceeding further in the matter.

DDA
RECEIVED ON
7 JAN 2020
Copy No 231 PMS: 26
DC/16/1

Handwritten signature
Principal
G.D.C. Nawagai
District Bajaur

Copy to DEO Khar for information and with reference to his letter No: 9374 Dated 22/10/2019.

Handwritten signature
Principal
GDC Nawagai District Bajaur

Handwritten signature

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INQUIRY REPORT

Subject: APPOINTMENT ORDER OF MR. ABDUL HADI, JUNIOR CLERK, GDC, NAWAGAI, BAJAUR.

Authority: Directorate of Higher Education, Khyber Pakhtunkhwa letter No. 5532 dated 26.02.2020.

BACKGROUND:

Brief but succinct facts leading to the instant inquiry is that Mr. Abdul Hadi S/O Late Syed Gulab was appointed as Junior clerk at GDC, Nawagai, Bajaur on deceased son's quota by District Education Officer (DEO), office Khar vide Endst; No. 1527-31 dated 28.10.2018 (F/A) and took over charge vide NO. 862 dated 08.11.2018 under his signature dated 01.11.2018 (F/B). Strange enough that the DEO, Khar, Bajaur requested Principal GDC, Nawagai vide letter No. 9374 dated 22.10.2019 to furnish all credentials like appointment order, service book etc. after a lapse of almost one year of his appointment (F/C) followed by another letter from DEO, Bajaur No. 1076 dated 10.12.2019 requesting for appointment order and charge report as the Principal furnished all other document to the DEO office vide letter No.1648 dated 30.10.2019 (F/D) in respect of Mr. Abdul Hadi, Junior Clerk with the exception of his appointment order as the same was not available with him and also directed the concerned clerk vide letter No. 1672 dated 16.12.2019 for provision of his initial appointment order within 24 hours but to no avail (F/E). In response, instead of compliance to the orders of his Principal, the concerned clerk recorded on body of the same letter charges accusing DEO, Khar, Bajaur for taking bribe (F/F).

B

Sensing the gravity of the case the Principal wrote to Director Higher Education, Khyber Pakhtunkhwa vide letter No. 1690 dated 04.01.2020 (F/G) for seeking guidance as the initial appointment order of the Junior Clerk of his college was still not traced and the Directorate of Higher Education constituted an inquiry on 26.02.2020 (F/H).

PROCEEDINGS:

The inquiry proceedings were started in light of E&D Rules, 2011 by directing District Education Officer, Khar, Bajaur; Principal, GDC, Nawagai, Bajaur and District Accounts Office, Khar, Bajaur to furnish complete record pertaining to the issue vide letter No.10254 dated 30.06.2020 (F/I). Besides, all other concerned like the Ex-DEO, serving DEO and his relevant staff, the accused and district account office were

(Signature)

(13)

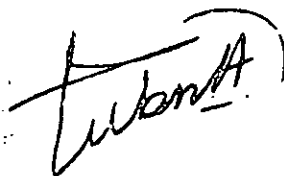
contacted on phone to facilitate the inquiry proceedings by providing necessary record if available.

In response the accused, Mr. Abdul Hadi, Junior Clerk submitted his written reply (F/J) with all necessary documents. He was given opportunity of defence by hearing him in detail. He not only blamed the DEO Mr. Khaista Rehman and concerned Principal for taking bribe but a strong contradiction was witnessed as he initially claimed an appointment order dated 28.10.2018 but during the visit of the undersigned to the DEO office on 11.07.2020, it transpired from the Diary/Dispatch register (F/K) that it was Sunday on 28-10-2018 and not a single letter had been issued from the DEO office on this date. On a query, he soon produced another appointment order dated 29-10-2018 (F/L) taking the plea that his earlier reply may be withdrawn being submitted mistakenly, but again no such order was issued from DEO office, rather the Diary/Dispatch register showed that letter No. 1527 was issued on 29/10/2018 in respect of Mr. Saleh Muhammad GF fund case (F/K). When the accused was confronted with the dispatch register, he had nothing in defence except to blame the DEO office for tempering with the whole Dispatch register which he could not prove with cogent evidence.

Principal GDC, Nawagai, beside his written reply (F/N) was also heard and his statement was recorded as PW-4 who clearly stated that he had no concern with his appointment order as charge was given to him much earlier by another Principal, He was also cross examined. The accused could not prove the charge against him.

Statement of Wali Ur Rehman, Assistant, DEO office, Khar as PW-1, Mr. Ilyas Khan, Senior Clerk (PW-2) previously working at DEO office w.e.f 2017 to August 2019 who were both custodian of the diary/Dispatch Register were recorded, who stated that the letter exhibited DW-I/I has not been issued from their office. The accused/defendant, Mr. Abdul Hadi was given opportunity of cross examination but he failed to establish any charge against them.

Statement of Mr. Amrullah Khan, Ex-DEO, Khar, Bajaur was recorded as PW-3 who clearly stated on oath that no such order Exhibited DW-I/I has been signed by him on 28/10/2018 or 29/10/2018. Besides he was confronted with the signatures borne on the letter Exhibited DW I/I which he categorically denied to be his signatures and his specimen signatures (F/M) were also taken for FSL examination to the extent that no appointment order of any ministerial staff on college side has been issued by him during his tenure w.e.f 01/06/2017 to 31-10-2018.



(12)

The accused submitted two appointment orders as Junior Clerk from DEO office dated 28-10-2018 and 29-10-2018 having no record on the diary. Dispute register with further confirmation that he took over charge of 11-2018 and his salary was initiated from DAO office on 29-10-2018 with a different personnel number to the one sent by his principal. (Details given in proceedings).

Appointment against deceased son quota is not the right of the accused as he himself admitted that his father has been appointed as Junior Clerk against the said quota, hence both the orders even if allegedly true are not legally right. The list of appointment orders issued from DEO office under deceased son's quota doesn't carry his name, which further falsify his claim.

For a long span of one year during correspondence between the DEO office and Principal, debate/question of validity was focused on the appointment order dated 28-10-2018 but when it transpired that it was Sunday on this date, the accused eventually changed his stance and produced another order 29-10-2018 which unveils his ulterior designs.

RECOMMENDATIONS:

Disciplinary proceedings may be initiated against Mr. Abdul Hadi, Junior Clerk GDC, Nowshar, Bajaur under Efficiency & Discipline Rules, 2017.

Note: Delayed submission of the report owes to Covid-19 Crisis.

Muhammad Bashir
23/11/2020
MUHAMMAD BASHIR
DY Director (Appointment)
Industry Officer
Directorate of Higher Education,
Khyber Pakhtunkhwa, Peshawar

Abdul



(22) 16

**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI NEAR CHAMKANI MOR, PESHAWAR**

E-mail:- dhekpkes@pesh@gmail.com - Facebook.com/dhekpkeshawar Twitter.com/dhekpkeshawar1

No. / CA-VIII/Estt: Branch/GDC, Nawagai

Dated Peshawa: the 10/9 /2020

To

1. Professor Dr. Muhammad Nisar,
Govt: Postgraduate College, Timergara (Dir Lower).
2. Assistant Professor Mr. Saeed Ullah Jan,
Govt: Postgraduate College, Timergara (Dir Lower).

SUBJECT: INQUIRY AGAINST MR. ABDUL HADI, JUNIOR CLERK (BPS-11), GOVT: DEGREE COLLEGE, NAWAGAI, BAJAUR.

Respected Sir, السلام عليكم

I am directed to refer to the subject cited above and to enclose herewith charge sheet and statement of allegations in r/o Mr. Abdul Hadi, Junior Clerk Government Degree College, Nawagai (Bajaur) to be served on the accused official and to state that Director, Higher Education, Khyber Pakhtunkhwa is pleased to appoint you as Inquiry Officer/Inquiry committee in the captioned case.

It is, therefore, requested to conduct a formal inquiry in the matter and Inquiry report thereof alongwith clear cut recommendations be sent to this office within a week positively.

(Muhammad Iftikhar)
DEPUTY DIRECTOR

Endst. No 15370-74 / CA-VIII/Estt: Branch/GDC Nawagai

Copy of the above is forwarded for information to the:

1. Principal, Government Degree College, Nawagai (Bajaur).
2. Mr. Abdul Hadi, Junior Clerk, Government Degree College, Nawagai (Bajaur) alongwith a copy of charge sheet/statement of allegations with the direction to appear before the inquiry committee on the date, time and venue fixed by the inquiry committee.
3. PA to Directorate of Higher Education, Khyber Pakhtunkhwa, Peshawar.
4. Assistant Director (Litigation), Local Directorate.
5. Superintendent Promotion Cell, Local Directorate.

Received on 21-09-2020

[Signature]
21-09-2020

(Muhammad Iftikhar)
DEPUTY DIRECTOR

[Signature]

To,

The Director Higher Education
Khyber Pakhtunkhwa Peshawar.

H (17)

Subject:

INQUIRY AGAINST MR. ABDUL HADI JUNIOR CLERK (BPS-11)
GDC NAWAGAI, BAJAOUR.

Respected Sir, Assalamu Alakum,

Reference to your office letter No.15368-69 CA-VII/Estt: Branch/GDC, Nawagai Dated Peshawar the 10.09.2020. The undersigned visited GDC Nawagal, office of the District Education Officer Khar Bajour, District Accounts Office Khar Bajour on 22.9.2020 and conducted fact finding inquiry against Mr. Abdul Hadi Junior Clerk of GDC Nawagai District Bajour. Report of the inquiry is hereby submitted for your kind perusal and further necessary action please.

FINDINGS

- 1 Mr. Said Gulab (the Late) Father of Mr. Abdul Hadi Junior Clerk was working as Head Master at Govt: High School Topmandal (Bajour) and died on 28.06.2006 during Government service. His son Mr. Fazal Hadi was appointed as Junior Clerk in BPS-07 against the deceased quota by the Agency Education Officer Bajour Agency Vide Endst: No.10779-84 Dated 15.02.2011, and now serving as Junior Clerk at GGDC Jandool District lower Dir.(Page:1-3)
- 2 Mr. Abdul Hadi submitted an application to the Political Agent Bajour on 23.1.2018 for appointment as Junior Clerk against the deceased quota. He also admitted that his younger brother i.e. Mr. Fazal Hadi has already availed the said quota. The Political Agent forwarded his application to the Agency Education Officer Bajour with a covering letter No.793/2/4/ Acctt Dated 03.01.2018 for necessary action as per rules(Page:4-5)
- 3 Consequently, Mr. Abdul Hadi was appointed as Junior Clerk against the deceased quota by Mr. Amrullah Wazir District Education Officer District Bajour Vide Endst: No.1527-31 Dated 28.11.2018(Sunday). It is worth mentioning that another appointment order of Mr. Abdul Hadi as Junior Clerk against the deceased quota has also been issued on 29.10.2018 bearing the same Endst No. with the same signature which make the case ambiguous, complicated and fake(Page: 6-7)
- 4 It was observed that the above mentioned Endst:No.i.e.1527-31 dated 29.10.2018 was allotted to the GPF case of another employee of the education Department namely Saleh Muhammad in the dispatch register of District Education Office Bajour and no record of Mr. Abdul Hadi's appointment as Junior Clerk was traced in any document of DEO office Bajour(Page:8-11)
- 5 The undersigned also visited and checked the District Accounts Office Bajour and carefully examined the available record in computer section. It was disclosed by

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SD (A)

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Directorate of Higher Education Peshawar	
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Mr. Hasham Ali Senior Auditor that the salary of Mr. Abdul Hadi Junior clerk was released from 29.10.2018 and punched on 23.11.2018 by Mr. Biland Assistant Accounts Officer under a single personal no.50439500. On the other hand Mr. Abdul Hadi has taken the charge against the vacant post of Junior Clerk at GDC Nawagai on 1.11.2018. Vide District Education Officer Bajour Endst: No.1527-31 dated 29.10.2018 (Page:12-19)

6. Mr. Abdul hadi has submitted a written defense before the Inquiry committee against the charges leveled against him and claimed that his appointment order was issued on 29.10.2018 and took over the charge on 1.11.2018. He blamed Mr. Khaista Rahman DEO Bajour for tempering in his service documents but could not produce solid proof in support of his claim. Moreover, he admitted that his younger brother i.e. Mr. Fazal Hadi has already utilized the deceased quota (Page:20-21)

CONCLUSION

It may be concluded from findings that:

1. Mr. Fazal Hadi S/O Said Gulab (the Late)/Brother of Mr. Abdul hadi has already availed the deceased quota in 2011 and presently serving as Junior Clerk at GGDC Jandool District Lower Dir.
2. There are two appointment orders of Mr. Abdul Hade's appointment as Junior Clerk bearing the same Endst:No .i.e. 1527-31 and same signature with different dates i.e. 28.10.2018(Sunday) and 29.10.2018 respectively .However ,the said Endst: No. and date i.e.29.10.2018 in the dispatched register has been allotted to the GPF case of Mr. Saleh Muhammad and his name is not existed in the dispatched register of DEO office. Moreover, Mr. Abdul Hadi's name is not included in the list of appointment made under deceased quota during 2018.
3. As per record of District Accounts Office Bajour, the pay of Mr. Abdul hadi was released from 29.10.2018 while he had taken his charge of duty with effect from 1.11.2018.Hence; there is a contradiction between the date of taking over charge and release of pay.

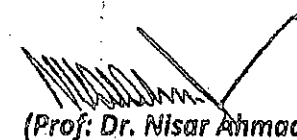
RECOMMENDATIONS

In the light of the findings of the present inquiry and documentary evidences, all charges leveled against the accused Abdul Hadi have been proved to be true. He has violated E&D rules 2011 and is guilty of misconduct.

He is therefore, recommended for major penalty under the efficiency and discipline rules 2011.



Saeedullah Jan
Assistant Professor
GPGC Timergara Lower Dir



(Prof: Dr. Nisar Ahmad)
GPGC Timergara Lower Dir





**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
KHYBER ROAD, PESHAWAR**

E-mail: dhekpkesha@gmail.com

Tel # 091-9210242 / 9211025

Fax # 091-9211803

Facebook.com/dhekpkesha Twitter.com/dhekpkesha1

Dated Peshawar the 18/3/2021

OFFICE ORDER

No.CA-VII/Estt: Branch/A-167/Mr. Abdul Hadi/GDC, Nawagai. WHEREAS Mr. Abdul Hadi, Junior Clerk, Govt. Degree College, Nawagai (Bajaur) was proceeded under the Khyber Pakhtunkhwa Government Servants (*Efficiency & Discipline*) Rules 2011, for the charges mentioned in the Charge Sheet and Statement of Allegations, served on the accused official vide Directorate of Higher Education Khyber Pakhtunkhwa Letter bearing Endst No. 15370/74 dated: 10-09-2020.

2. AND WHEREAS a fact finding inquiry was conducted by Mr. Muhammad Bahsir, Deputy Director (Establishment), Directorate of Higher Education, Khyber Pakhtunkhwa followed by formal inquiry conducted by an inquiry committee comprising Dr. Muhammad Nisar, Professor, Govt. Postgraduate College Timergara and Mr. Saeed Ullah Jan, Assistant Professor, Govt. Postgraduate College Timergara against the accused official for the charges levelled in charge sheet and statement of allegations and charges stands established against him.

3. AND WHEREAS, he was afforded the opportunity of personal hearing in the office of the Director Higher Education, Khyber Pakhtunkhwa where he could not defend the charges against him.

4. NOW THEREFORE, the Competent Authority, the Director, Higher Education, Khyber Pakhtunkhwa after having considered the charges evidence on record, personal hearing of the accused and in exercise of the powers conferred upon him under Rule-4 in sub rule (b)(iii) of the Khyber Pakhtunkhwa Efficiency & Disciplinary Rules, 2011 is pleased to impose the major penalty of "Removal from Service alongwith recovery of salaries drawn by him in the capacity of Junior Clerk" upon him with immediate effect.

**DIRECTOR, HIGHER EDUCATION
KHYBER PAKHTUNKHWA**

Endst;No. 6259-61 /GDC Nawagai

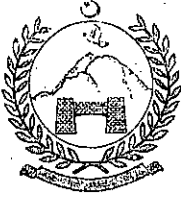
Copy of the above is forwarded to the: -

1. Principal Govt. Degree College, Nawagai (Bajaur) with the remarks to register an FIR against Mr. Abdul Hadi, Ex-Junior Clerk on account of forgery and fraud and also make recovery of salaries illegally drawn by him at the earliest.
2. District Account Officer, Bajaur
3. Mr. Abdul Hadi, Ex-Junior Clerk, Govt. Degree College, Nawagai (Bajaur).

s/ Bahsi 18/3/2021
DY: DIRECTOR (ESTABLISHMENT)

Imposition of Penalties P - 37

Tubana



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

Phone No. 9213501-2 Ext.20 Fax #091-9210368

No.SO(C-IV) HED/19-7/Abdul Hadi/Junior Clerk/2021
Dated Peshawar the 2nd August, 2021.

To

The Director,
Higher Education, Khyber Pakhtunkhwa

Subject:

DEPARTMENTAL APPEAL AGAINST THE ORDER BEARING ENDST: 6259-61/GDC
NAWAGAI DATED 18.03.2021 WHEREBY THE PENALTY OF "REMOVAL FROM
SERVICE ALONG WITH RECOVERY OF SALARIES DRAWN BY HIM IN THE
CAPACITY OF JUNIOR CLERK" WAS IMPOSED.

I am directed to refer to your letter No. 3819/CA-VII/Estt: Branch/A-167/GDC Nawagai dated 07.07.2021 on the subject noted above, and to state that the subject appeal may be filed and criminal procedure may also be initiated under Section-420 of Pakistan Penal code 1860 (copy enclosed), against Mr. Abdul Hadi, Ex-Junior Clerk, Govt. Degree College, Nawagai Bajaur, please.

Encl: as above



SECTION OFFICER (C-IV)

Endst: No. & Date as above.

Copy to the:-

1. PS to Secretary, Higher Education Department.
2. Master file.


SECTION OFFICER (C-IV)



K
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**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI NEAR CHAMKANI MOR, PESHAWAR**

E-mail: dkpkpesh@gmail.com Facebook.com/dhokppeshawar Twitter.com/dhekppeshawar1

No. 19115 /CA-VII/Estt; Branch/A-167/GDC Nawagai

Dated Peshawar the 8 /19 /2021

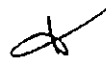
To

The Principal,
Govt: Degree College,
Nawagai (Bajaur).

Subject: - DEPARTMENTAL APPEAL AGAINST THE ORDER BEARING ENDST: NO 6259-61/GDC NAWAGAI DATED 18-03-2021 WHEREBY THE PENALTY OF "REMOVAL FROM SERVICE ALONGWITH RECOVERY OF SALARIES DRAWN BY HIM IN THE CAPACITY OF JUNIOR CLERK" WAS IMPOSED

Respected Sir, السلام عليكم

I am directed to enclose herewith Letter No. SO(C-IV)HED/19-7/Abdul Hadi/Junior Clerk/2021/1061 dated 04-02-2021 received from Section Officer (C-IV), Higher Education Department, Khyber Pakhtunkhwa on the subject noted above and to request you to lodge an FIR against Mr. Abdul Hadi, under Section-420 of the Pakistan Penal Code: 1860, under intimation to this office, please.

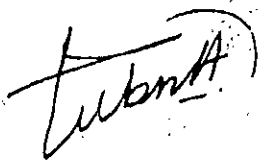

(Khawaja M. Saqib)

ASSISTANT DIRECTOR (GENERAL)

Endst. No. 19416
Copy of the above is forwarded to Section Officer (C-IV), Higher Education Department, Khyber Pakhtunkhwa, Peshawar w/r to his Letter quoted above.

etc

ASSISTANT DIRECTOR (GENERAL)


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GOVT. DEGREE COLLEGE
NAWAGAI DISTRICT BAJAUR
PAKISTAN

No. _____
Dated: / / 2021

To
District Police Officer
Khar District Bajaur.

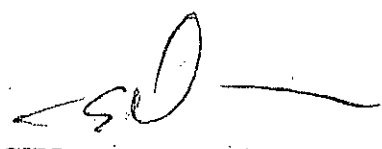
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**SUBJECT: DEPARMENTAL APPEAL AGAINST THE ORDER BEARING ENDST: NO 6259-61/
GDC NAWAGAI DATED 18-03-2021 WHEREBY THE PENALTY OF "REMOVAL FROM
SERVICES ALONG WITH RECOVERY OF SALARIES DRAWN BY HIM IN THE CAPACITY OF
JUNIOR CLERK" WAS IMPOSED.**

Respected Sir,

Enclosed please find herewith a letter No. 19415/CA-VII/Estt: Branch/A-167/GDC Nawagai, dated 8/9/2021 received to the office in September 23, 2021 from Assistant Director General Higher Education on the subject cited above. An inquiry was proceeded against Mr. Abdul Hadi Son of Said Gulab resident of village Mamenzo Tehsil Khar, ex-junior clerk of this college under the (E&D) rules 2011 in which major penalty of removal from service along with recovery of salaries was imposed (Annexure A). So far, we approached your good office for an FIR against the official concerned. (Annexure B,C). Therefore, your good self is requested, that as per directions of Director, Higher Education Peshawar, an FIR may kindly be lodged against the official concerned and arrangements may kindly be made for the recovery of salaries with effect from 29/10/2018 to 31/03/2021.

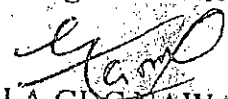
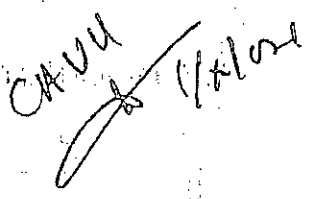
Thanks!



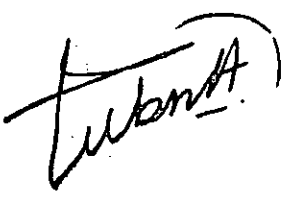
PRINCIPLA GDC NAWAGAI
DISTRICT BAJAUR

No. 2338..... Dated / /

Copy of the above is forwarded to the Assistant Director General High Education Peshawar w/r to his letter quoted above.


PRINCIPLA GDC NAWAGAI
DISTRICT BAJAUR
Principal
GDC Nawagai
Distt: Bajaur

Email Address:// gdenawagai@gmail.com // Phone: 03028829733





DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI NEAR CHAMKANI MOR, PESHAWAR

122 (23)

E-mail:- dhekpesh@gmail.com Facebook.com/dhekpeshawar Twitter.com/dhekpeshawar1

No. 99817 / CA-VII/Estt: Branch/A-167/GDC Nawagai

Dated Peshawar the 25 / 11 / 2021

To

District Police Officer,
Khar (Bajaur).

Subject: - DEPARTMENTAL APPEAL AGAINST THE ORDER BEARING ENDST. NO 6529-61/GDC NAWAGAI DATED 18-03-2021 WHEREBY THE PENALTY OF "REMOVAL FROM SERVICE ALONG WITH RECOVERY OF SALARIES DRAWN BY MR. ABDUL HADI, EX-JUNIOR CLERK OF GDC NAWAGAI

Respected Sir, السلام عليكم

I am directed to enclose herewith Letter No. 2363 dated 04-10-2021 received from Principal, Government Degree College, Nawagai (Bajaur) alongwith enclosures and to state that Mr. Abdul Hadi, Ex-Junior Clerk, Government Degree College, Nawagai (Bajaur) has been removed from service after completion of due process under the law on account of fraud and forgery (Copy Enclosed); It is requested that FIR under Section 420 of the Pakistan Penal Code 1860 may be lodged against Mr. Abdul Hadi at the earliest in the light of Provincial Government Letter No. SO(C-IV) HED/19-7/Abdul Hadi/Junior Clerk/2021/1061 dated 04-02-2021 (Copy Enclosed) and recoveries for the period 29.10.2018 to 18.03.2021 on account of pay drawn by him may also be made under intimation to this office please.

(Khawaja M. Saqib)

ASSISTANT DIRECTOR (GENERAL)

Endst No. 99818-22

Copy of the above is forwarded to:

1. The Secretary, Higher Education Department, Khyber Pakhtunkhwa, Peshawar.
2. The Inspectors General of Police, Khyber Pakhtunkhwa.
3. Principal, Government Degree College, Nawagai (Bajaur) for similar necessary action please and to share the actual amount he drawn on account of pay and allownces.

ASSISTANT DIRECTOR (GENERAL)

(Handwritten signature)

The District Police Officer,
Bajaur.

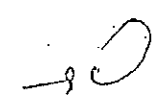
Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER BEARING ENDST: NO. 6259-61/GDC NAWAGAI DATED 18-03-2021 WHEREBY THE PENALTY OF "REMOVAL FROM SERVICE ALONG WITH RECOVERY OF SALARIES DRAWN BY MR. ABDUL HADI, EX-JUNIOR CLERK OF GDC NAWAGAI.

Respected Sir,

Kindly refer to Letter No. 27918-20 dated 25-11-2021 from Director Higher Education received to this office on 07-12-2021 on the subject cited above, the requisite information and actual amount drawn by the official concerned (Abdul Hadi, EX-Junior Clerk) of this college is forwarded to your good office for further necessary action please. (Copy attached)

The actual amount drawn by Abdul Hadi, EX-Junior Clerk is 745,786.00/- (copy attached) with effect from 29-10-2018 to 18-03-2021.

So, it is requested that the above mentioned amount may be recovered from the official concern please.



Principal
GDC Nawagai District Bajaur
Distt: Bajaur

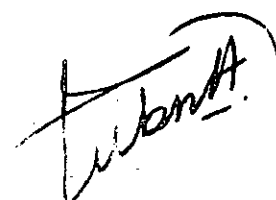
No. 2449 Dated 15/12/2021

Copy of the above is forwarded to:

1. Director Higher Education Khyber Pakhtunkhwa Peshawar.

CH 2449
15/12


Principal
GDC Nawagai District Bajaur
Distt: Bajaur



REGISTER OF LETTERS DISPATCHED

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S. NO.	DATE	NAME & DESIGNATION	PLACE	SUBJECT	FILE HEAD & NO.	STAMPS RECEIVED		STAMP USEI
						RS.	P.	
1461-62	22/10/18	D/Permissions		in Gmail is Natia Charming				
1462-63	"	D.A. Rafana		Retirement M. Walei				
1465	"	D.A. NMA	Post	Retirement Benefit and death comp A				
1466	"	Managing Director RB&DC	"	Medical Leave Hospital Kuala				
1467	"	D.E. ALDID Pesh	"	Retirement Benefit A.F. Ishaq Haddoi				
1468	"	Managing Director EEF	Post	" " EEF-1-20				
1469	"	D.E. ALDID KPK	"	Complaint Mrs Saad				
1470	"	D.A. Bajaur	"	G.P.F. sanction				
1471	22/10/18	To All concerned	"	Mutual Transfer Asia Bibi Khalida				
1472-73	23/10/18	To All concerned	"	Appointment order M. Saad				
1477-83	"	To All concerned	"	Appointment order M. Saad Sp. G.				
1480	"	D.E. Peshawar	"	Proposal for Adjustment G.P.F. Grandai				
1485	"	D.A. Bajaur	"	G.P.F. Fund Sanction M. B. La. Adnan I.				
1486	24/10/18	D.E. ALDID KPK	Post	Implementation of transfer				
1487	24/10/18	Manager Transport		NOC Abdul Rauf Qazi				
1488-89	"	Principal GMS Laghawai		Cancellation of Canteen M. Ishtiaq Sultan				
1490-93	"	To All concerned	(P)	Explanation / Show cause Notice				
1494-96	"	" " " " "	"	" " " " "				
1497	24/10/18	Managing Director	Post	Stamps for children of Govt Employees				
1498	"	" " " " "	EEF	App for Retirement Relief M. Saad				
1499	"	Managing Director RB&DC	"	" " " " Benefit				
1500	"	D.C. Bajaur	"	" " " " B.F.I.				
1501-02	"	D.A. D.H.	"	Sanction of G.P.F. Adm. Fatal Victim				
1503	"	D.E. ALDID	"	" " " " M. J. Ibrahim H.I.				
1504	"	D.A. Bajaur	"	" " " " Hussain Aza H.				
1505	"	" " " " "	"	" " " " Mehar Begum				
1506	"	Manager RB&DC	"	Retirement Benefit Khurshid				
1507	"	Director EEF	Post	Stamps for children G-employees				
1508	"	To All concerned	"	Explanation				
1509-10	"	To All concerned	"	"				
1511	"	D.A. Bajaur	"	Final Payment M. Saad Adnan P.S.				
1512	"	" " " " "	"	Pension case of Inayatullah				
1513	"	D.C. Bajaur	"	App. in R/o Zafarullah s/o G. Saad				
1514	"	D.A. D.H.	"	G.P.F. Fund Payment Bacha Sultana				
1515	"	" " " " "	"	" " " " Bacha Nigora				
1516	24/10/18	D.E. ALDID KPK	"	Sympathetic Appeal Latif Khan				
1517	"	" " " " "	"	No Certificate of Badshah Muhammad				
1518-21	"	To All concerned	"	Explanation / Show cause Notice				
1522	29/10/18	Director EEF	Post	App for Retirement Relief M. Saad				
1523	"	D.C. Khaw	Post	" " " " "				
1524	"	Managing Director EEF	Post	" " " " "				
1525	"	D.E. ALDID KPK	"	Pension case Saad Muhammad				

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REGISTER OF LETTERS DISPATCHED

NO.	DATE	NAME & DESIGNATION	PLACE	SUBJECT	STAMPS RECEIVED		STAMPS USED		REMARKS
					RS.	P.	RS.	P.	
		D. A. D. B. gaur	B)	G.P.F. Mr. Saleh Muhammad					

Closed on 29/10/2018
 Amrullah Khan Wazir
 Transferred.
 District Education Officer
 Bajaur

1549-46	30/10/18	To All concerned		Charge Report- Sultan Muhammad Amrullah (38)
1549-52	"	To All concerned		Specimen Signature & D.Fo- Sultan Muhammad
1553	"	DE NMD Peshawar		Add: Grant of TA
1554	"	"		L.P.R. Gul Jan N/O Daud Budan
1555-59	1/10/18	To All concerned		Reliving chit in R/O Amrullah Khan
1560	1/10/18	Lubna A.D.O (F)		Doc G.P.S mian khalil So/
1561-66	1/11/18	To All concerned		Minutes of meeting Principal/H/M/H/M/teachers
1567	2/11/18	" " "		Release of Salaries for the month of 9/2018
1569-69	"	" " "		Pension Papers Jam Jadh Ex-SIT T-Cl. Umar
1570	"	DE NMD KP16 Pesh		" " "
1571-75	"	To All concerned		Transfer Order
1576-77	"	" " "		Cancellation of mutual Transfer
1578	"	Sheer Ali Khan		Explanation
1579-82	"	To All concerned		-do-
1583	"	Gkramullah		Show Cause
1584-86	"	To All concerned		-do-
1587	"	Amrullah Muhammad		Show Cause
1588-90	"	To All concerned		-do-
1591-93	5/11/18	To All concerned		Cancellation/Withdrawal Order
1594-97	"	To All concerned		Transfer Order Miss Shamun Saad
1598	"	DE NMD KP16 Pesh		Staff Statements of School
1599	"	" " "		Appeal
1600	"	To All concerned		" " F. Rahim

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OFFICE OF THE AGENCY EDUCATION OFFICER
BAJOUR AGENCY AT KHAR

APPOINTMENT ORDER

Mr. Farid Haidi (S/O Late Sd/ Gulab Haidi) (SRS) Top
Mandir of Bajor Agency is hereby appointed against vacant J.C. Post (deceased) of O/S
Kamistara Durang Bajor Agency purely on temporary basis in O/S No: 07 plus usual
allowances as admissible under the rules to the light of establishment divisional letter
No. 342/2005-02, dated 12/06/2005 and section officer (Reg-6) Etab. & Adm. Department Govt
of NWFP letter No. 200/11-3 (Reg AD) dated 22/10/2005 from the date of his taking over charge
in the interest of public service.

TERMS OF CONDITIONS

1. The appointment of the candidate is purely on temporary basis his
to terminate non-extendable without assigning any reason.
2. He will not be eligible for any gratuity benefits, however, his provident and CP
fund will be deposited.
3. His reports should be submitted to all concerned
offices of documents should be verified from the concerned offices before
drawal of his salary.
4. Health and age certificate should be produced to this office as obtained from
the Agency or other concerned.
5. He will be governed according to the Govt policy.
6. If he failed to report of his actual work in 15 days his appointment order will be
mechanically considered as cancelled.

(HAJI GUL RABHAF)
Agency Education Officer
Bajour Agency

Order No: 16779 Etab. Dated Khar (Kh) 15/12/2011

- Copy of the is forwarded to the:-
1. Director of Education (FATA) Peshawar.
 2. Agency Accounts Officer Bajour Agency.
 3. AAEO (M) Concerned.
 4. Accountant/Pay Clerk of the local office.
 5. Head Master Concerned.
 6. Official Concerned.

Agency Education Officer
Bajour Agency

Tubana

- (b) if the post does not fall within the purview of the Commission, in the manner as may be determined by Government.

⁴⁰(2) Initial recruitment to posts which do not fall within the purview of the Commission shall be made on the recommendation of the Departmental Selection Committee, after vacancies have been advertised in newspapers.

⁴¹Provided that nothing contained in this sub-rule shall apply to the household staff of the Chief Minister House Peshawar, Frontier House Islamabad, Frontier Rest Houses Bannu, Swat and Abbottabad, Frontier House Nathia Galli and Shahi Mehman Khana, Peshawar and any other House to be established by the Government:

⁴²Provided further that the appointment in Basic Pay Scale-1 to 4 shall be made on the recommendations of the Departmental Selection Committee through the District Employment Exchange concerned, ⁴³[or, where in a District, the office of the Employment Exchange does not exist, after advertising the posts in the leading newspapers] ⁴⁴[]

(3) A candidate for initial appointment to a post must possess the educational qualification or technical qualifications and experience and except as provided in the rules framed for the purpose of relaxation of age limit, must be within the age limit as laid down for the post, provided that-

- (i) ⁴⁵where recruitment is to be made on the basis of written examination, then, notwithstanding anything to the contrary contained in any other rules for the time being in force, age shall be reckoned on 1st January of the year in which the examination is proposed to be held;
- (ii) in other cases as on the last date fixed for submission of applications for appointment.

⁴⁶(4) Where a civil servant dies during service, then notwithstanding the procedure provided for in sub-rule (2), the appointing authority may appoint one of the children of such civil servant, or if the child has not attained the age prescribed for appointment in Government service, the widow of such civil servant, to a post in any of the Basic Pay Scales 1 to 15:

Provided that the child or the widow, as the case may be, possesses the minimum qualification prescribed for appointment to the post:

Provided further that if there are two widows of the deceased civil servant, preference shall be given to the elder widow:

Provided also that the appointment under this sub-rule is subject to availability of a vacancy and if more than one vacancies in different pay scales is available at a time, and the child or the widow, as the case may be, possesses the qualifications making him or her

⁴⁰ Sub rule (2) of Rule-10 substituted by Notification No. SOR-I(S&GAD) 1-117/91 (C), dated 12-10-1993.
⁴¹ Proviso added vide Notification No. SOR-VI(E&AD)1-3/2003 (VI) dated 03-07-2003.
⁴² Proviso added vide Notification No. SOR-VI(E&AD)1-3/2003 (VI) dated 16-03-2004
⁴³ Sentence added in the Proviso vide Notification No. SOR-VI(E&AD)1-3/2003 (VI) dated 23-01-2006.
⁴⁴ 2nd Proviso in sub- rule (2) of Rule 10 was deleted vide Notification No. SOR-VI(E&AD)1-3/2008 dated 09-05-2008 and added again vide Notification No. SOR-VI(E&AD)1-3/2008 dated 03-11-2008.
⁴⁵ Clause (i) substituted vide Notification No. SOR-I(S&GAD)4-1/80, dated 17-5-1989.
⁴⁶ Sub rule (4) substituted vide Notification No. SOR-VI (E&AD)1-3/03/II, dated 05-09-2006.

Submitt

eligible for appointment in more than one post, he/she shall ordinarily be appointed to the post carrying higher pay scale.

⁴⁷(5) Notwithstanding anything contained in any rule for the time being in force, two percent of all posts in each basic pay scale to be filled in by initial recruitment shall be reserved for disabled candidates and ten percent of all posts meant for initial recruitment shall be reserved for female candidates:

Explanation-I---For the purpose of reservation under this sub-rule "disability" does not include such disability which hampers in the smooth performance of the duties required of a disabled candidate.

Explanation-II---Ten per cent quota reserved above shall be in addition to the posts exclusively reserved for female candidates.

⁴⁸(6) Notwithstanding anything contained in any rule for the time being in force, five per cent of all posts in each basic pay scale to be filled in by initial recruitment shall be reserved for candidates hailing from earthquake affected areas of District Mansehra, Battagram, Shangla, Kohistan and Abbottabad (Calamity hit area) for a period of three years commencing from 1st February, 2006.

⁴⁹(7) Notwithstanding anything contained in any rule for the time being in force, 0.5 percent of all the posts in each basic pay scale to be filled in by initial recruitment shall be reserved for candidates belonging to minorities in addition to their participation in the open merit:

Provided that, the reservation shall not apply to—

- (i) the percentage of vacancies reserved for recruitment on merit;
- (ii) short term vacancies likely to last for less than one year; and
- (iii) isolated posts in which vacancies occur only occasionally.

11. **Eligibility.** (1) A candidate for appointment shall be a citizen of Pakistan and bona fide resident of the North-West Frontier Province.

Provided that for reasons to be recorded in writing, Government may, in a particular case, relax this restriction.

⁵⁰[(2)]

(3) No person, not already in Government service, shall be appointed to a post unless he produces a certificate of character from the principal, academic officer of the academic institution last attended and also certificates of character from two responsible persons, not being his relatives, who are well acquainted with his character and antecedents.

(4) Notwithstanding anything contained in sub-rule (3), an appointment by initial recruitment shall be subject to the verification of character and antecedents of the candidate or the person appointed, to the satisfaction of appointing authority.

⁴⁷ Sub rule (5) substituted vide Notification No. SOR-VI (E&AD)1-10/03 (VI), dated 04-12-2007.

⁴⁸ Sub rule (6) inserted vide Notification No. SOR-VI(E&AD)1-3/03 (VI), dated 01-02-2006

⁴⁹ Sub rule (7) added vide Notification No. SOR-VI(E&AD)1-3/08, dated 06-01-2009

⁵⁰ Sub rule (2) of rule-11 deleted vide Notification No. SOR-VI(E&AD)1-3/08, dated 17-06-2008

APPOINTED IN DECEASED SON QUOI

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(31)

Name	Father Name	Designation	Date of appointment
Miraj Khan	Sher Khan	PST	September 2016
Abdul Rauf	M. Jan	PST	September 2016
Sadiq Ullah	Fazal Manan	PST	September 2016
Muhammad Mustafa	Muhammad Shoqib	PST	September 2016
Jamal ud Din	Khaista Gul	PST	September 2016
M. Younas	Abdul Ghani	PST	September 2016
Zia Ullah	Aziz ul Hakim	P/Imam/Qari	September 2016
Rizwan Ullah	M. Younas	P/Imam	September 2016
Sher Muhammad	Nazir Jan	P/Imam	September 2016
Shahid Hussain	Ghulam Shakil	J/C	September 2016
Siraj ud Din	Zahir Shah	J/C	01/12/2016
M. Ikram	Sher Muhammad	C-IV	01/12/2016
Sher Muhammad	Ajab Khan	J/C	06/02/2017
Wahid ur Rahman	M. Jamal	J/C	06/02/2017
Zakir Ullah	Umar Zada	PST	06/02/2017
Abdul Khaliq	Abdul Rauf	Lab: Asstt:	26/07/2017
Abdullah	Muhammad Gulab	Lab: Asstt:	26/07/2017
Abdul Qaddos	Abdul Rahim	Lab: Asstt:	26/07/2017
Sana Ullah	Saidam Khan	PST	26/07/2017
Sharif Ullah	Muhammad Zaman	Lab: Asstt:	19/12/2017
Rafiauddin	Miftahuddin	PST	03/08/2018
Muhammad Saleem	Muhammad Younas	Lab:Asstt	26/09/2018
Hayat Ullah	Fazal Karim	Lab:Asstt	26/09/2018
Zia ul Wahid	Gul Zaman	J/C	05/10/2018
Shear Muhammad	Nazir Jan	Qari	05/10/2018
Siraj ud Din	Sikandar Khan	PST	31/01/2019
Zia Ul Islam	Muhammad Zubair	PST	31/01/2019
Zeeshan Ali	Zafar Ali	Lab Assist:	31/01/2019
Irshad Khan	Muhammad Zahir Shah	J/C	31/01/2019
Hidayat Ullah	Lali Gul	Pesh Imam	31/01/2019
Jamal ud Din	Bakhti Jan	Lab Asslst:	31/01/2019
Muhammad Shahid	Hamish Gulab	J/C	25/02/2020
Abdul Wali Khan	Dawai Khan	J/C	25/02/2020
Shafique Ahmed	Amir Mohammad	PST	26/02/2020
Raz Muhammad	Khani Gul	Chowkidar	20/05/2020
Zaid Ahmed	Gul Ghan Khan	J/C	20/05/2020

(Signature)
25.7.20

(Signature)
AUL

(Signature)
District Education Officer
Bajaur

(Signature)
Lubana

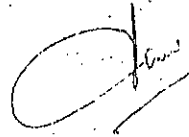
APPOINTED IN DECEASED SC

No. 1 and GH

32

No.	Name	Father Name	Desi.	Date of appointment
1	Miraj Khan	Sher Khan	PST	September 2016
2	Abdul Rauf	M. Jan	PST	September 2016
3	Sadiq Ullah	Fazal Manan	PST	September 2016
4	Muhammad Mustafa	Muhammad Shoaib	PST	September 2016
5	Jamal ud Din	Khaista Gul	PSY	September 2016
6	M. Younas	Abdul Ghani	PST	September 2016
7	Zia Ullah	Aziz ul Hakim	P/Imam/Qari	September 2016
8	Rizwan Ullah	M. Younas	P/Imam	September 2016
9	Sher Muhammad	Nazir Jan	P/Imam	September 2016
10	Shahid Hussain	Ghulam Shaki	I/C	September 2016
11	Siraj ud Din	Zahir Shah	I/C	01/12/2016
12	M. Ikram	Sher Muhammad	C-IV	01/12/2016
13	Sher Muhammad	Ajab Khan	I/C	06/02/2017
14	Wahid ur Rahman	M. Jamal	I/C	06/02/2017
15	Zakir Ullah	Umar Zada	PST	06/02/2017
16	Abdul Khaliq	Abdul Rauf	Lab: Asstt:	26/07/2017
17	Abdullah	Muhammad Gulab	Lab: Asstt:	26/07/2017
18	Abdul Qaddos	Abdul Rahim	Lab: Asstt:	26/07/2017
19	Sana Ullah	Saidam Khan	PST	26/07/2017
20	Sharif Ullah	Muhammad Zaman	Lab: Asstt:	19/12/2017
21	Rafiauddin	Miftahuddin	PST	03/08/2018
22	Muhammad Saleem	Muhammad Younas	Lab:Asstt	26/09/2018
23	Hayat Ullah	Fazal Karim	Lab:Asstt	26/09/2018
24	Zia ul Wahid	Gul Zaman	I/C	05/10/2018
25	Shear Muhammad	Nazir Jan	Qari	05/10/2018
26	Siraj ud Din	Sikandar Khan	PST	31/01/2019
27	Zia Ul Isiam	Muhammad Zubair	PST	31/01/2019
28	Zeeshan Ali	Zafar Ali	Lab Assist:	31/01/2019
29	Irshad Khan	Muhammad Zahir Shah	I/C	31/01/2019
30	Hidayat Ullah	Lali Gul	Pesh Imam	31/01/2019
31	Jamal ud Din	Bakhti Jan	Lab Assist:	31/01/2019
32	Muhammad Shahid	Hamish Gulab	I/C	25/02/2020
33	Abdul Wali Khan	Dawai Khan	I/C	25/02/2020
34	Shafique Ahmed	Amir Mohammad	PST	26/02/2020
35	Raz Muhammad	Khani Gul	Chowkidar	20/05/2020
36	Zaid Ahmed	Gul Ghani Khan	I/C	20/05/2020

Lubana



District Education Officer
Bajaur



DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI NEAR CHAMKANI MOR, PESHAWAR

140 (33)
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Email:- dhekpesh@gmail.com Facebook:- [dhekpeshawar](https://www.facebook.com/dhekpeshawar) Twitter:- [dhekpeshawar1](https://twitter.com/dhekpeshawar1)
 CA-VIII/Estt: Branch/GDC Nawagai Dated Peshawar the 22/12/2020

Mr. Abdul Hadi, Junior Clerk,
 Govt; Degree College,
 Nawagai (Bajaur).

Subject: - DISCIPLINARY PROCEEDINGS AGAINST MR. ABDUL HADI, JUNIOR CLERK
GOVT: DEGREE COLLEGE, NAWAGAI (BAJAUR).

Memo:

I am directed to refer to the subject noted above and to state that consequent upon the charges of malpractice and misleading authorities in the light of inquiry conducted by Prof. Dr. Muhammad Nisar and Assistant Prof. Saeed Ullah Jan against you, your personal hearing has been fixed by the Competent Authority on 01-01-2021 at 02:30 pm.

In view of the same you are directed to appear before the Director, Higher Education Khyber Pakhtunkhwa, Peshawar in his office on 01-01-2021 at 02:30 pm for your defence.

(Signature)
 (Muhammd Iftikhar)
 DEPUTY DIRECTOR

Endst; No. 24/60-61, Govt: Degree College, Nawagai

Copy of the above is forwarded for information/necessary action to the:

1. Principal, Government Degree College, Nawagai (Bajaur), with the request to inform Mr. Abdul Hadi, Junior Clerk to ensure his presence on the date and venue as mentioned above.
2. Deputy Director (Establishment), Local Directorate.
3. Deputy Director (IT), with the request to circulate the same electronically, please.
4. Assistant Director (Litigation), Local Directorate.
5. Superintendent Promotion Cell, Local Directorate.
6. P.A to Director, Higher Education Department, Khyber Pakhtunkhwa, Peshawar.

OTC

(Signature)
 (Muhammd Iftikhar)
 DEPUTY DIRECTOR

(Signature)

91 (39)
148

**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI NEAR CHAMKANI MOR, PESHAWAR**

dhkpkpesh@gmail.com Facebook.com/dhekppeshawar Twitter.com/dhekppeshawari

519 / CA-VII/Estt. Branch/GDC Nawagai

Dated Peshawar the 20/1/2021

Mr. Abdul Hadi, Junior Clerk,
Govt; Degree College,
Nawagai (Bajaur).

**Subject: - DISCIPLINARY PROCEEDINGS AGAINST MR. ABDUL HADI, JUNIOR CLERK
GOVT: DEGREE COLLEGE, NAWAGAI (BAJAUR).**

Memo:

I am directed to refer to the subject noted above and to state that consequent upon the charges of malpractice and misleading authorities in the light of inquiry conducted by Prof. Dr. Muhammad Nisar and Assistant Prof. Saeed Ullah Jan against you, your personal hearing has been fixed by the Competent Authority on 25-01-2021 at 11:00 am.

In view of the same you are directed to appear before the Director, Higher Education Khyber Pakhtunkhwa, Peshawar in his office on 25-01-2021 at 11:00 am for your defence.

21/1/2021
(Muhammad Iftikhar)
DEPUTY DIRECTOR

Endst; No. 1729-25 / Govt: Degree College, Nawagai

Copy of the above is forwarded for information/necessary action to the:

1. Principal, Government Degree College, Nawagai (Bajaur), with the request to inform Mr. Abdul Hadi, Junior Clerk to ensure his presence on the date and venue as mentioned above.
2. Deputy Director (Establishment), Local Directorate.
3. Deputy Director (IT), with the request to circulate the same electronically, please.
4. Assistant Director (Litigation), Local Directorate.
5. Superintendent Promotion Cell, Local Directorate.
6. P.A to Director, Higher Education Department, Khyber Pakhtunkhwa, Peshawar.

(Muhammad Iftikhar)
DEPUTY DIRECTOR

576

Tubana

WAKALATNAMA

IN THE _____

BEFORE THE SERVICES TRIBUNAL PESHAWAR KPK.

Suit/Rent Case
Misc. Application
✓ Appeal/Revision No. 735 of 2021
Execution
Petition

ABDUL HADI

Plaintiff
Applicant
Appellant ✓
Petitioner
Decree Holder

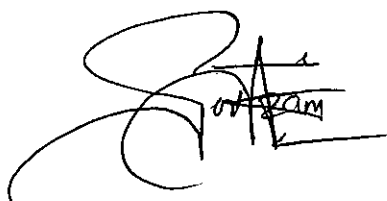
VERSUS

SECRETARY HIGHER EDUCATION and OTHERS

Defendant
Respondent
Judgment
Debtor

I/We Abdul Hadi, the Appellant in the above titled Service appeal, do hereby appoint, constitute and authorize **Mr. UMAIR AZAM KHAN**, Advocate High Court, as my/our counsel with complete authority to appear, plead and act for me/us in the above mentioned proceedings and to conduct, refer the matter to arbitration, prosecute and/or defend and/or compromise the same and any other proceedings that may arise out of or be connected with the same, with full power and authority to engage/appoint any other advocate/counsel at my/our expenses, to sign all necessary pleadings, petitions, applications, papers and documents, to pay all proper fees and costs, to file and withdraw all documents and to apply for and receive payment of all moneys that may be or become due and payable to me/us during the course or after the completion or conclusion of the said proceedings, and to settle, compromise or to withdraw the said proceedings without any liability for his default.

Received and accepted at Peshawar on dated 06-09-2022



UMAIR AZAM KHAN

ADVOCATE HIGH COURT

Office: Flat No. 1, Atif plaza,
Opposite City Railway Station,
Dala Zak Road, Peshawar.

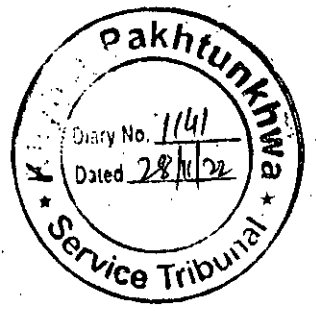
NIC No. 17301-4684245-9

Bar Council No. bc-11-1319

Cell No: 03009027239,

Email: umairazamkhanadvocate@yahoo.com

Abdul Hadi
Signed By



بعدالت جناب سروس ٹریبونل صاحب پشاور

عبدالہادی نام ہائر ایجوکیشن خیبر پختونخوا پشاور وغیرہ

مقدمہ نمبر 7351/21

put up to the court with relevant appeal

”درخواست برائے جلد از جلد فیصلہ کئے جانے

آئندہ تاریخ پیشی جلد مقرر کئے جانے مقدمہ بعنوان بالا“

28/11/22

Deadu

جناب عالی! درخواست گزار حسب ذیل عرض رساں ہیں۔

- 1 یہ کہ من سائل کا مقدمہ بعنوان بالا عدالت حضور میں سال 2021 سے چلا آ رہا ہے۔
- 2 یہ کہ من سائل محکمہ ہائر ایجوکیشن میں بحیثیت جو نیر کلرک اپنے فرائض منصبی نہایت ایمان داری کے ساتھ سرانجام دے رہا تھا لیکن بغیر کسی وجہ کے من سائل کو نوکری سے برخاست کر دیا گیا۔
- 3 یہ کہ من سائل کا تعلق انتہائی غریب اور مفلس گھرانے سے ہے جس کی بناء پر من سائل اتنی استطاعت نہیں رکھتا کہ روزمرہ کے عدالتی اخراجات برداشت کر سکے اوپر سے محکمہ متذکرہ بالا کی جانب سے ظلم کی انتہاء کہ من سائل کو بلا کسی عذر وجہ کے نوکری سے برخاست کیا گیا ہے۔ مزید ازاں یہ کہ من سائل اتنا عرصہ نوکری سے برخاست رہنے پر اور بوجہ بیروزگاری مختلف اشخاص کا تقریباً 6 لاکھ روپے سے زائد کا قرض دار ہو چکا ہے اور آئے روز من سائل کو قرض دار تنگ و پریشان کر رہے ہیں۔
- 4 یہ کہ من سائل کے مقدمہ بعنوان بالا میں آئندہ تاریخ پیشی مورخہ 07/02/2023 مقرر کی گئی ہے جس میں کافی زیادہ وقت دیا گیا ہے من سائل کو جلد از جلد کی آئندہ تاریخ پیشی مقرر کی جائے تاکہ

من سائل کا فیصلہ متوقع ہو سکے۔

لہذا استدعا ہے کہ درخواست ہذا حسب استدعا من سائل کے مقدمہ میں جو تاریخ پیشی آئندہ کیلئے دی گئی اس کو جلد از جلد مقرر کئے جانے کے احکامات صادر فرماتے ہوئے من سائل کو قانون و انصاف کے مطابق انصاف فراہم کیا جائے اور من سائل کو نوکری پر بحال کیا جائے۔

المرقوم 28/11/2022

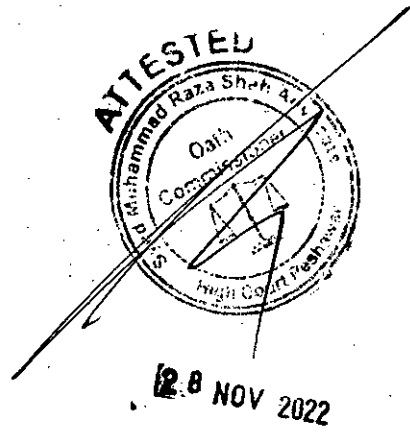
رض

سائل

عبداللہ
عبداللہ ہادی ولد سید گلاب

گورنمنٹ ڈگری کالج ناوگنی

رابطہ نمبر 0302-8196968



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR


PROFORMA FOR EARLY HEARING

FORM 'A'

To be filled by the Counsel/Applicant

Case Number	7351/21		
Case Title	عبدالباری بنام نامہ ایجوکیشن و سٹوڈنٹ		
Date of Institution	2021-		
Bench	SB		DB ✓ ✓
Case Status	Fresh		Pending ✓ Pending
Stage	Notice		Reply Argument ✓
Urgency to clearly stated.	فرعیدہ سے پیش فرسٹ لیت ہے۔ اور عدلیہ کا زرم معاشی اسی اور گاہ سے جلتی ہے اور کوئی زرم معاشی نہیں ہے۔ لہذا اگر کسی کو حالیہ فیصلہ سے بائیں تاکہ مندرجہ کے افسانہ مل سکے		
Nature of the relief sought.			
Next date of hearing	7/02/2023		
Alleged Target Date	5/12/22		
Counsel for	Petitioner ✓	Respondent	In person

AIFA.
20/1/22


Signature of counsel/party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing _____ -p/20 _____

In case No. 7357/21 _____ -p/20 _____

محمد علی Vs گام انجمن و سہ

Presented by محمد علی on behalf of محمد علی. Entered in the relevant register.

Put up alongwith main case _____

REGISTRAR

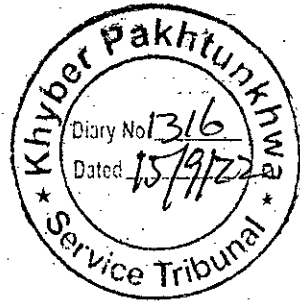
Last date fixed	<u>28-11-2022</u>
Reason(S) for last adjournment, if any by the Branch Incharge.	<u>Due to Rush</u>
Date(s) fixed in the similar matter by the Branch Incharge	
Available dates Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING



FORM 'A'

To be filled by the Counsel/Applicant

Case Number	7351/a021		
Case Title	Abdul Hadi vs. Govt of Khyber Pakhtunkhwa & others		
Date of Institution			
Bench	SB		DB ✓
Case Status	Fresh		Pending ✓
Stage	Notice		Reply ✓ Argument ✓
Urgency to clearly stated.	As the appellant has been removed from service of the appellant is jobless the only source of income was the service, therefore an early fixation of the case was being heard on the previous date of hearing & was fine for reasons only.		
Nature of the relief sought.	An early date of hearing is requested.		
Next date of hearing	28/11/2022		
Alleged Target			
Date			
Counsel for	Petitioner	Respondent	In person

M.F.A
27/9/2022

Abdul
Signature of counsel/party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing application -p/2022

In case No SA 7351 -p/2021

Abdul Hadi Vs Govt of KP Punjab

Presented by Abdul Hadi on behalf of h person. Entered in the relevant register.

Put up alongwith main case _____

Last date fixed	
Reason(S) for last adjournment, if any by the Branch Incharge.	
Date(s) fixed in the similar matter by the Branch Incharge	
Available dates Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

خدمت مقام چترس ما

FPIK سردسز شریعتی لاج

عبد القادی بیک مندرسی اہل سنت

تاریخہ تاریخ پیدائش 28/11/2021

کس نمبر 7351/2021

درخواست گزار
جلو شریعتی

مقام

سبیل حسب ذیل عرض رہا ہے

۱۔ یہ کہ میری سب سے زیادہ آمدنی کا نام ہے 28/11/2021

جبکہ اس کا نام ہے تاریخ پیدائش

۲۔ یہ کہ سزا (مذکورہ) اراداً *deleg*

کے تحت اس کے احوال پر ہے جس میں مذکورہ

ان کے نام پر ہے *daemin* جس کے نام پر

مگر ان کے پاس ہے اس کے نام پر ہے

28/11/2021 کا نام ہے

بہال منیر
15/11/21

۳۔ یہ کہ سزا میں ہے شریعتی لاج میں

نزدیکی نام ہے تاریخ پیدائش

15/11/21

21103-6497174-3

03028196968

عبد القادی



کدیت جناب پولیسنگل ایجنٹ باجوڑ

عنوان: درخواست برائے تعیناتی جوئیر کلرک

جناب

مودبانہ گزارش کی جاتی ہے۔ کہ مندرہ کا والد ایجوکیشن ڈیپارٹمنٹ

میں بطور ہیڈ ماسٹر پوسٹ پر جی ایچ ایس ٹیوٹریل مینڈل میں فرائض سرانجام دے رہا تھا۔

اور دوران سروس وفات پا گیا۔ اور مندرہ نے ڈیپنٹی کوٹہ میں رولز کے مطابق

2010 میں نوکری کیلئے درخواست دیا تھا۔ لیکن اس وقت کے AEO نے میرے

پھوٹے کاپی کو بھرائی گیا۔ جو مندرہ نے سابقہ سربراہ الفانی سے - ESTA کوڈ

رولز کے مطابق یہ مندرہ کا حق بنتا تھا۔ دو ہفتے پہلے مندرہ نے PAEO صاحب

کو ارسال کیا تھا۔ لیکن تا حال کون کاروانی عمل میں نہیں لائی گئی۔

لہذا آپ صاحبان مہربانی کر کے مندرہ کو جوئیر کلرک پر تعیناتی کا حکم

صادر فرمائیے۔

Dated: 23/11/2018

الغرض

ایک مخلص عبدالباری ولد سید ظاہر غرسموزی ترغاب تحصیل سوات باجوڑ ایجنسی

Enclosed.

1. Death Certificate.
2. Service Certificate.
3. Application of 2010 TO AEO Bajaur.
4. Documents (Educational).

Acft

Known
as Mr. Suber

PAB

25/11/18

