02.03. 2023

Junior of learned counsel for the appellant present. Mr. Umair Azam Khan, Additional Advocate General for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in preparation of examination, which is commencing from 04.03.2023. Adjourned. To come up for arguments on 27.04.2023 before the D.B. Parcha Peshi given to the parties.

(Fareella Paul) Member (E)

(Salah-ud-Din) Member (J)

27.04.2023 Appellant present through counsel.

Fazal Shah Mohmand, learned Additional Advocate General for respondents present.

Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on 26.06.2023 before D.B. Parcha Peshi given to the parties.

(Rozina Rehman) Member (J)

Mutazem Shah

Appellant in person present.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Due to general strike of the bar, case is adjourned to 01.12.2022 for hearing before D.B.

(Fareeha Paul) Member (E)

(Rozina Rehman) Member (J)

01st Dec. 2022

Appellant present in person. Mr. Naseerud Din Shah, Assistant Advocate General for the respondents present.



Appellant requested for adjournment due to engagement of his learned counsel in Hon'ble Peshawar High Court.

Last opportunity is granted. To come up for arguments on 02.03.2023 before the D.B.

(Fareeha Paul) Member (E)

(Rozina Rehman) Member(J)



23.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 20.05.2022 for the same as before.

20.05.2022

Nemo for appellant.

Mr. Rehman Ali ASO alongwith Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Previous date was adjourned on a Reader Note, therefore, notice for prosecution of the appeal be issued to appellant and his counsel for the next date. To come up for arguments on 20.07.2022 before the D.B.

(Rozina Rehman) Member (J)

(Salah-Ud-Din) Member (J)

Nemo for parties.

Muhammad Adeel Butt, learned Additional Advocate General present.

Despite directions, notices were not served due to lack of fund, therefore, proper notices be issued to both the parties for 27.09.2022 for arguments before D.B.

(Fareeha Paul) Member(E)

(Rozina Rehman) Member (J)

Coursel was telephonically Coursel was telephonically Informed to availabile due to postal ticket

29.10.2021

Junior of learned counsel for the appellant present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Junior of learned counsel for the appellant submitted rejoinder, copy of which handed over to learned Assistant Advocate General. Junior of learned counsel for the appellant also requested for adjournment for arguments on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar and unable to attend the Tribunal today. Adjourned. To come up for arguments on 23.02.2022 before the D.B.

(Mian Muhammad) Member (E) (Salah-Ud-Din) Member (J)

11.01.2022

Nemo for the appellant. Mr. Muhammad Adeel Butt, Addl. AG alongwith Muhammad Yaseen, SDO and Irfan Anjum, Assistant for the respondents present.

Appellant/learned counsel be given notice for prosecution of the appeal. To come up for arguments on 23.02.2022 before the D.B.

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



Junior to counsel for the appellant present. Addl: AG for respondents present.

Arguments could not be heard due to learned Member(Judicial) is on leave.

Adjourned to 01.04.2021 for arguments before D.B.

(Mian Muhammad) Member(E)

01.04.2021 Due to non availability of the concerned D.B, the case is adjourned to 05.07.2021 for the same.

Reader

05.07.2021

Appellant in person present.

Muhammad Adeel Butt learned Additional Advocate General alongwith M/S Lajbar S.D.O and Irfan Assistant for respondents present.

Former submitted an application for adjournment; allowed. To come up for arguments on 29.10.2021 before D.B0.

(Rozina Rehman) Member(J)

8-4-2020

Due to COVID19, the case is adjourned to $\frac{6}{67}$ 2020 for the same as before.

Reader

06.07.2020 Due to COVID19, the case is adjourned to 31.08.2020 for the same as before.

31.08.2020

Due to summer vacation, the case is adjourned to 05.11.2020 for the same as before.

Reader

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12-7-27

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05.11.2020

Junior to counsel for the appellant and Addl: AG for respondents present.

Form-the United to 140 9.2024 For Hearing vetore the D.B.

D.B0.

(Mian Muhammad) (Rolling brekenan)

光帝国中を持ねるの) Member(J) Chairman'

19.02.2020

Appellant in person and Mr. Kabirullah Khattak, Additional AG alongwith M/S Khurshid, Assistant Social Welfare Organizer and Irfan, Assistant for the respondents present. Representatives of the department submitted joint para-wise comments on behalf of respondents No. 1 to 3. The same is placed on record. To come up for rejoinder and arguments on 08.04.2020 before D.B.

(MUHAMMAD AMIN KHAN KUNDI)

MEMBER

25,10.2019

Junior to counsel for the appellant present. Mr. Kabirullah Khattak learned Addl: AG alongwith Khursheed ASO for the respondents present.

Representative of the respondents requests for time to furnish requisite reply/comments. Granted. To come up for reply/comments on 28.11.2019 before S.B.

Chairman -

28.11.2019

Appellant in person and Addl. AG alongwith Khursheed, ASO for the respondents present.

Representative of the respondents seeks further time to furnish the reply/comments. Adjourned to 09.01.2020 on which date reply/comments shall positively be submitted.

Chairman

09.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Khursheed, ASO and Muhammad Irfan, Assistant for the respondents present.

Representatives of the respondents request further time to furnish reply/comments. Request is accepted but as last chance. To come up for requisite reply/comments on 19.02.2020 before S.B.

25.06.2019

Learned counsel for the appellant present. Preliminary arguments heard.

The appellant (Ex-Chowkidar) has filed the present service appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 06.11.2018 whereby the appellant was terminated from service on the ground of prolonged absence and irresponsible attitude.

Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for reply/comments. To come up for written reply/comments on 26.08.2019 before S.B.

Member

26.08.2019

Appellant in person present.

Appellant submitted an application for extension of time to deposit security and process fee which have not been deposited within due time.

The application is allowed and appellant is permitted to deposit the requisite fee within three working days from today. Thereafter, notices be issued to the respondents for submission of written reply/comments on 25.10.2019 before S.B.

Chairman

Appellant Deposited
Security Process Fee

Form- A

FORM OF ORDER SHEET

Court of		
Case No	687/ 2019	

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	Case No	
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	23/05/2019	The appeal of Mr. Mujahid resubmitted today by Mr. Asif Ali Shah Advocate may be entered in the Institution Register and put up to the
:		Worthy Chairman for proper order please.
2-	24/05/19	This case is entrusted to S. Bench for preliminary hearing to be put up there on 25/06/19
		CHAIRMAN
-		
	•	

This is an appeal filed by Mr. Mujahid today on 25/03/2019 against the order dated 06.11.2018 against which he preferred/made departmental appeal/ representation on 24.01.2019 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiency.

1- Annexures of the appeal may be attested.

2- Memorandum of appeal may be got signed by the appellant.

3- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.

No.5

SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

Mr. Asif Ali Shah Adv. Pesh.

R/Gir.

The case is re-submitted after elegated of statutory period, and after necessary the objections raise of by this office, except objection No.3, because copies has not been provided to the appellant, please be fixed before the Horible Bench.

Appellant

Dated: 23 -83 2019

Joursel 1 7

BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTOON KHEWA, PESHAWAR.

..... Appellant

Service Appeal No. ________ /2019

Mujahid S/O Anwar Shah, Ex-Chowkidar, R/O Azeem Khan Pul Habibzai,

Charsadda.....

Government of Khyber Pukhtoon Khawa & others Respondents.

Versus

INDEX

S.No.	Particulars	Annexure	Page Nos.
1	Memo of Appeal		1-4
2	Affidavit		5
3	Medical Documents	A	6-18
4	Copy of Termination Order	В	19
5_	Appeal & Order of Department	С	20
9	Wakalatnama		21

15th may 2018

Through

ASIF ALI SHAH

Petitioner

Advocates, High Court, Chamber: 3-A. Haroon Mansion

Chamber: 3-A, Haroon Mansion, Khyber Bazar, Peshawar.

Cell:0333-9006806

BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTOON KHEWA, PESHAWAR.

Service Appeal No	/2019
Mujahid S/O Anwar Sha Azeem Khan Pul Habibz	

Versus .

- 1. Government through Secretary Public Health, K.P.K, Civil Secretariat, Peshawar.
- 2. Chief Engineer Public Health, K.P.K, Civil Secretariat Peshawar.
- 3. Xen, Public Health, Charsadda.
- 4. Executive Engineer Public Health, Charsadda.Respondents

APPEAL U/S 4 OF THE NWFP SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED: 06.11.2018, WHEREBY THE ORDER OF TERMINATION FROM SERVICE HAS BEEN PASSED AGAINST THE APPELLANT.

Prayer:

ON ACCEPTANCE OF THIS APPEAL THE ORDER DATED: 06.11.2018 PASSED BY RESPONDENT NO. 04 MAY PLEASE BE SET-ASIDE AND THE APPELLANT BE RE-INSTATED BACK TO HIS SERVICE WITH ALL BACK BENEFITS.

Respectfully Sheweth:

- 1. That the appellant was serving as Chowkidar in respondents department.
- 2. That the appellant has been serving his department by heart and soul and has got at his credit a length of service extending to so many years.
- 3. That the illegally the appellant was transferred so many times from different stations with in a span of six months and the appellant was a rolling stone between the political figures and respondents.
- 4. That in the month of July, 2018 the appellant was admitted in District Headquarter Hospital Charsadda and this matter was reported to Respondent No.4 and orally requests for leave from duty. (Copies of hospital record is attached as Annexure-A).
- 5. That the appellant along with others were performing duties at Zarin Abad and respondent No.4 assured the appellant that the appellant can join his duties after full recovery and in the meanwhile the appellant made so many visits of the respondents offices along with the medical prescription and Doctors' advise.
- 6. That when the appellant reported for duty after recovery from Typhoid fever, he was shocked that he has been terminated from service on 06.11.2018 without informing the appellant and observing the codal formalities. (Copy of order is attached as Annexure-B).
- 7. That being aggrieved of the above said termination order the appellant then filed a departmental appeal but no heed was paid to the said appeal and when the appellant again visited the office of respondent No.3 so many times, either the appeal is returned in Original and nor any order was passed in response to the appeal. (Copy of the appeal is attached as Annexure-C).

8. That there being no other remedy in the matter pertaining to the terms and conditions of the services of the appellant this appeal is hereby submitted on the following grounds amongst the others.

Grounds:

- a) That the impugned order, of termination from service, against the appellant is illegal, unlawful, without authority / jurisdiction and being based on the malafide intentions of the respondent department is liable to be set-aside.
- b) That by receiving information the above said impugned order the appellant was just taken by surprise as neither any notice, nor any show cause or intimation whatsoever was served by the respondent department upon the appellant.
- c) That the appellant was condemned unheard and no chance of hearing / defence whatsoever was provided as described under the prevailing laws to the appellant.
- d) That no enquiry proceedings has enumerated under the law has ever been initiated against the appellant and just Hire and Fire policy was adopted by the respondent department, thereby issuing the termination orders without any justification or without adopting any legal process.
- e) That it seems that the Government wants to fill the above said vacancies by appointing his own blue eyed persons by adopting such an unjustified and un-service of the Civil Employee, for which neither any example can be quoted throughout the history of the civil servants nor any such procedure is warranted by the prevailing laws as promulgated throughout the country.
- f) That neither the appellant has committed any misconduct as defined under the relevant laws

(4)

nor he has been treated as according to the law, thereby neglecting and bulldozing the very basic right of the appellant as enumerated in the constitution of the Islamic Republic of Pakistan.

IT IS, THEREFORE, PRAYED THAT ON ACCEPTANCE OF THIS APPEAL THE ORDER DATED: 06.11.2018 PASSED BY RESPONDENT NO. 04 MAY PLEASE BE SET-ASIDE AND THE APPELLANT BE RE-INSTATED BACK TO HIS SERVICE WITH ALL BACK BENEFITS.

Appellant

Through

Asif Ali Shah

&

Qaiser Abass Muhammadzai Advocates High Court.



BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTOON KHEWA, PESHAWAR.

Service Appea	l No	/2	2019
Mujahid S/O Azeem Charsadda	Khan	Pul	Habibzai.
	Versus	<u>.</u>	
Government of	Khyber Pukht	oon Khav	wa & others

AFFIDAVIT

...... Respondents.

I, Mujahid S/O Anwar Shah, Ex-Chowkidar, R/O Azeem Khan Pul Habibzai, Charsadda, do hereby solemnly affirm and declare on oath that contents of the accompanying Appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Honorable Tribunal.

m) Lund w Deponent.

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DISTRICT HEAD QUARTER TEACHING HOSPITAL CHARSADDA

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District Headquarters Hospital Charsadda

OUT -PATIENTS DEPARTMENT

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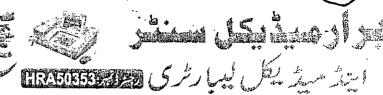
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District Headquarters Hospital Charsadda

OUT -PATIENTS DEPARTMENT

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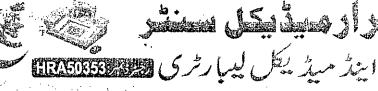
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THE EXECUTIVE ENGINEER PUBLIC HEAT CHARSADDA.

Dated Charsadda the. 26/1/2018.

IFFICE ORDER.

Inspite of the fact that final notice issued to the following operational staff admin dudy news paper "Aaj" in its issue dated 09-10-2018 none of them has reported his arrival for

Name of Official	
Mr. Mujahid S/O Anwar Shah	Designation.
The second secon	Chowkidar
Mr. Babar Kamal S/O Fateh Ullah Khan.	P.
	Pump operator.

Recping in view their prolong absence and irresponsible attitude the competent authority to terminate both the above mentioned officials in the best interest of the Public

Executive Engineer PHE Division Charsadda

Superintending Engineer PHE Circle Peshawar for information please.

District Accounts Officer Charsadda for information please.

Sab Divisional Officer PHE Sub Division Charsadda / Tangi for information Ottlivial Congerned

> **Executive Engineer** PHE Division Charsadda



OFFICE OF THE EXECUTIVE ENGINEER PUBLIC HEALTH ENGINEERING DIVISION, CHARSADDA

No.05/E-3

Dated Charsadda the 06/11/2018

OFFICE ORDER

Inspite of the fact that final notice issued to the following operational staff through daily news paper "Aaj" in its issue dated 09.10.2018 none of them has reported his arrival for party

S#	Name of Official	Designation
	Mr. Mujahid S/o Anwar Shah	Chowkidar
2.	Mr. Babar Kamal S/o Fateh Ullah Khan	Pump Operator

Keeping in view their prolong absence and irresponsible attitude the contempt authority please to terminate both the above mentioned officials in the best interest of the public

Sd/-Executive Engineer PHE Division, Charsadda

Copy to the

- 1. Superintending Engineer PHE Circle Peshawar for information please.
- 2. District Accounts Officer Charsadda for information please.
- 3. Sub Divisional Officer PHE Sub Division Charsadda/Tangi for information
- 4. Official Concerned

Sd/-Executive Engineer PHE Division, Charsadda

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BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR.

Service appeal No. 687/2019

VERSUS.

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02	Affidavit		3
03	Absence Notices, Show cause Notice, Newspaper Notices	A	4-16
04	Verification Memo of Medical Superintendent DHQ Hospital	В	17
	Charsadda	·	

RESPONDENT'S THROUGH

P#1 3

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR.

Service Appeal No. 687/2019

Mr. Mujahid S/O Anwar Shah, Ex-chowkidar,

R/O Azeem Khan Pul Habibzai, Charsadda......APPELLANT

- VERSUS.

 1. Government of Khyber Pakhtunkhwa through Secretary Public Health Engineering Department, Civil Secretariat, Peshawar.
- 2. Chief Engineer Public Health Engineering, Department, Civil Secretariat, Peshawar.
- 3. Executive Engineer, Public Health Engg: Division Charsadda Peshawar.Respondent

JOINT PARA-WISE COMMENTS ON BEHALF OF RESPONDANTS NO. 1, 2,&3

RESPECTFULLY SHEWETH,

PRELIMINARY OBJECTIONS:

- 1. That the appellant has no cause of action / locus standi.
- 2. That the appellant has not come to this Honorable Court with clean hands.
- 3. That the present appeal in hand is not maintainable in its present form and also in the Present circumstances of the issue.
- 4. That the present appeal is liable to be dismissed with cost for miss joinder / non joinder of necessary parties.
- 5. That the appellant has filed the instant appeal on malafida motives.
- 6. That the instant appeal is against the prevailing laws and rules.
- 7. That the instant appeal is badly time-barred.

ON FACTS:

- 1. Correct.
- 2. Incorrect. That the appellant did not perform his duty honestly and remained, willfully absent, from government duty without any intimation/application. Hence time and again several notices, show cause notices and newspaper notices were issued to appellant to discharge his duty but he turned deaf ear to the notices. Copies attached as annexure "A".
- 3. Incorrect. That the appellant was transferred to ensure his attendance, the appellant did not pay heed to the orders of the authority in the discharge of his government duties.
- 4. Incorrect. Neither oral nor written application for leave had been submitted by the appellant to the authority concerned. Moreover the medical record of hospital submitted by the appellant is bogus factitious, and unreal. All his available documents have no match in hospital record. Copy of verification memo of Medical Superintendent DHQ Hospital Charsadda is attached as annexure "B".
- 5. Incorrect. The appellant remained absent from his official duties.
- 6. Incorrect. The appellant was terminated after fulfilling all codal formalities.

- 7. Incorrect. As discussed above.
- 8. The appellant was treated lawfully; he was terminated from government service after fulfilling all codal formalities keeping in view his prolong absence from government duties without any intimation/application to concerned authority.

GROUNDS:

- A. Incorrect. The appellant is treated as per rules and regulations and as per his appointment orders.
- B. Incorrect. The appellant was served several notices, show cause notice and newspapers notices but he did not responded to the notices and remained willfully absent from government duty without intimation/application to the authority concerned.
- C. Incorrect. The appellant was informed through daily newspaper to attend the office and explain the reasons of absence but in vain.
- D. Incorrect. Already discussed above.
- E. Incorrect.
- F. Incorrect.

PRAYERS:

In view of the above facts, it is prayed before this Honorable Court that the appeal being Vexatious and devoid of merit may please be dismissed with cost.

Secretary

Public Health Engg: Department
Khyber Pakhtunkhwa Peshawar
(Respondent No. 1)

Chief Engineer (South)
Public Health Engg: Department
Pakhtunkhwa Peshawar

(Respondent No.2).

Public Health Engg: Division Charsadda (Respondent No.3)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAHAWAR

Service Appeal No. 687/2019

Mr. Mujahid s/o Anwar Shah, ex- Chowkidar, APPELANT

VERSUS.

AFFIDAVIT.

I, Khurshid Khan Assistant Social Organizer of PHE Department, do hereby solemnly affirm and declare that the joint Para wise comments with supporting documents filed by the Respondents are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Service Tribunal Khyber Pakhtunkhwa, Peshawar.

DEPONENT.

CNIC #: 17301-4045003-9 Cell No. 03449296964.

OFFICE OF THE SUB DIVISIONAL OFFICER PUBLIC HEALTH ENGG: SUB DIVISION CHARSADDA

No E-4/02

Dated Charsadda the 12017

To

Mujahid S/O Anwar Shah Chowkidar WSS Zarin Abad

Subject

Habitual Absence and Lack Of Interest In Govt Duties.

As reported by Sub-Engineer that most often you remain absent from the Scheme and do not take interest in Govt duties. You were directed time and again to rectify your attitude towards Govt duties but you failed to do so. Such type of unauthorized absence is creating problems for us and the community and we have received many complaints from the scheme.

You are therefore directed to report to this office within three days and explain your position otherwise strict disciplinary action will be initiated against you.

SUB DIVISIONAL OFFICER
PHE SUB DIVISION CHARSADDA

C y to the.-

Executive Engineer PHED Charsadda for stoppage of salary of the staff member and further necessary action please.

SUB DIV SIONAL OFFICER

PHE SUB DIVISION CHARSADDA

OFFICE OF THE EXECUTIVE ENGINEER PUBLIC HEALTH ENGINEERING DIVISION

OFFICE OF THE STATE	CHARSADDA.
	Dated Charsadda the. $\frac{9}{16}$ /2017.
No 153 109 .	
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The Mujahid S/O Anwar Shah Chowkidar on WSS: Mohammad Nari.

HABITUAL ABSENCE AND LACK OF INTEREST IN GOVERNMENT Subject: DUTIES.

SDO PHE Sub Division Charsadda office letter No. E-4 / 02 dated: 11-05-2017 Reference:-

As per report of Sub Divisional Officer PHE Sub Division Charsadda vide his office letter under reference above. You are directed to perform your duty otherwise strict disciplinary action will be taken against you:

HE Division Charsadda

- Sub Divisional Officer PHE Sub Division Charsadda with reference to his office letter No. quoted above. You are advised to deduct pay of the official for the absent period through Challan with Coby to the intimation to this office.
- Establishment Clerk for information, and directed to deduct pay for absent period through source.

OFFICE OF THE SUB DIVISIONAL OFFICER PUBLIC HEALTH ENGG: SUB DIVISION CHARSADDA

E4/01

Dated Charsadda the -9-1-8--/2017

Tric Executive Enginger hill, Chvision Charsadda

> Disciplinary Action Against Mr Mujahid For Continuous Absence From Govt Duty.

ो ।इन्छ brought to your kind notice that Mujahid Chowkidar Water Supply Scheme Zarin of sent from Cloub they since last 2 months. His last salary was deposited in Govt .

for the same reason. Several notices have been issued to him but all in vain.

it is therefore requested that strict disciplinary action may be initiated against him as it seems that he has no interest in Govt duties.

15 - QUIT.

SUB DIVISIONAL FFICER PHE SUB DIVISION CHARSADDA

OFFICE OF THE EXECUTIVE ENGINEER PUBLIC HEALTH ENGINEERING DIVISION CHARSADDA.

No. 1 E - 3 - , 02

Dated Charsadda the. 22/8/2017.

To.

Mr. Mujahid Chowkidar

WSS: Mohammad Nari.

Subject:-

ABSENT FROM GOVERNMENT DUTY.

As reported by Sub Divisional Officer vide letter No. *E-4/01 dated: 9-08-2017*, that you are not performing your duties.

You were directed by the concerned Sub Engineer & Sub Divisional Officer but you turned deaf ear to all the directions.

Therefore you are directed to explain your position in person to Sub Divisional Officer PHE Sub Division Charsadda within three days

Executive Engineer
PHE Division Charsadda

Copy to the:-

- 1- District Accounts Officer Charsadda are requested immediately stop the pay of the official till further order please.
- Sub Divisional Officer PHE Sub Division Charsadda for information with reference to his office letter mentioned above & report the matter after 3-days

THE EXECUTIVE ENGINEER PUBLIC HEALTH ENGINEERING DIVISION

Dated Charsadda the. 28/08/2017.

Mr. Mujahid S/o Anwar Shah Chowkidar.

Subject:-

SHOW CAUSE NOTICE.

Reference:-

This office Final Notice No. E-3 / 02 dated: 22-08-2017.

It has seriously been observed that both of you have proved yourself as unwilling worker. You were habitually remained absent from Government duty since long till date without any intimation / application. Final notice was issued to report the office for duty, but both of you failed to do.

Keeping in view the above, you are served with this show cause notice to explain within seven days that why not disciplinary action under E&D rules could be taken against you for willful absence from duty.

If no reply to this notice is received within the stipulated period of its delivery, it shall be presumed that you both have no defense to put in and an ex-parte action will be taken against you.

> Executive Engineer PHE Division Charsadda

Superintending Engineer PHE Circle Peshawar for information please. Copy to the:-

Sub Divisional Officer PHE Sub Division Charsadda / Tangi for information.

DAO (Local) for information.

PHE Division Charsadda

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JU-60 JU-10 2,5/2 Juour plair régles Gills itse میں وکیرار کی تو سط ہر طازی ہے۔ کوکہ والدہ کی شماداری ی ول 11,000 m 100 m 100-09-2017 m 06-07-17 m 7 pd ~ 3 2 25 by 0 Cr 64 by 2 2 i volo of 2 de (m) 23 ev 109 & 25, in 39.96 جر ہافان ہے 15 میں سے 15 میں انرر انرر فاقر بح ما مام على الورا مام المرا المام المرا . اسلام کی درواسی می کرارش می درواسی عامیان کو سیرنے مواف کا دی کاروانی کا حق کا حق کا میں اس

CUTIVE ENGINEER PUBLIC HEALTH ENGINEERING

Dated Charsadda the. 20/09/2017.

The Sub Divisional Officer PHE Sub Division Charsadda.

Subject:-

RESUME OF GOVERNMENT DUTY.

Mr. Mujahid Gul S/O Anwar Shah Chowkidar has been attended the office of undersigned to resume his duty on 19-09-2017, after absence notice through publication in News Paper, since absence from 06-07-2017.

In Future do not recommend / sanction leave of the official without permission of the undersigned besides pay of the official may be released from the date of resuming of his duty i.e 19-09-2017.

DA/ Application.

Executive Engineer PHE Division Charsadda

Copy to the:-

Divisional Accounts Officer (Local) for information. He maybe directed to follow absence period of the official under rules.

Head Clerk (Local) for information.

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To.		. Initials of Receive	*Write he ing Offic (\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	re "letter", "postcard", "packet" or "par	cel sary
	Mr. Müjahid Chowkidar	$\left\{\begin{array}{l} M_{surance,h} \\ M_{surance,h} \end{array}\right\}$	e and c	Weight Kilo (in words) Grams	_
Subject: -	ABSENCE FROM	addi M GOVERN of se			•

As reported by Head Clerk & concerned Sub Divisional Officer that you are absent from Government duty for last two months and your where about is unknown.

You were directed several times but you are disregarded all the directions and your where about is not known.

Therefore you are finally directed to assume your duty otherwise strict action will be initiated against you under E&D rules.

> S/C Executive Engineer PHE Division Charsadda

Copy to the:-

- Superimending Engineer PHE Circle Peshawar for information please.
- District Accounts Officer Charsadda for information please.
 - Establishment Clerk to stop the pay of the official till further order.

THE EXECUTIVE ENGINEER PUBLIC HEALTH ENGINEERING DIVISION

Dated Charsadda the. 25/09/2018.

- Mr. Mujahid S/o Anwar Shah Chowkidar...
- Mr. Babar Kamal S/o Fateh Ulla Khan Pump Operator.

Subjects

<u>SHOW CAUSE NOTIČE.</u>

Reference:-

This office Final Notice No. E-3 / 06 dated: 11-09-2018.

It has seriously been observed that both of you have proved yourself as unwilling worker. You were habitually remained absent from Government duty since long till date without any intimation / application. Final notice was issued to report the office for duty, but both of you failed to do.

Keeping in view the above, you are served with this show cause notice to explain within seven days that why not disciplinary action under E&D rules could be taken against you for willful absence from duty.

If no reply to this notice is received within the stipulated period of its delivery, it shall be presumed that you both have no defense to put in and an ex-parte action will be taken against you.

Executive Engineer PHE Division Charsadda

Superintending Engineer PHE Circle Peshawar for information please.

Sub Divisional Officer.PHE Sub Division Charsadda / Tangi for information.

DAO (Local) for information.

با قاعده ورزش ڈیمنشیا اورالزا ئیمر کا خطرہ دورکر تی

اہم جھے ''رپی فرطل کارٹیس'' پر اچھا اگر شئے ذہائے کا پرھید فیدل کرنے سوچنے اورفکر وَجِيدُهُ الروسِ مَدُودِيناتُ مِي مِن كُلُّ بِيزِيلَ مُ مین جی در فراہم کرتا ہے اس کے عااد دورزش وال اتا وُدِر كر كم موذ بهتر بنال سے جموی طور پر وَرَرْشُ أَن رَمَا فِي مِن الصِّنول كوبرُ هَا أَن إِسِ النَّ عِمَا رب میں براہ میں ایک ایک مرتبدور ان کرے اور بھے اوجی شال بین ایک ایک مرتبدور ان کرنے یک وزری اثر ات دو سے تمان محفظ تک برقر ادر بے بن دورا فائده يه ي كه با قاعده دوزش دما في دوركرل ب-



عارضون وزيشااورالزا نيرجيس بارى كالحطره بمى

ك الله على بكو الراس العد جرب ير فروداد في 98.6 فارن بالياب عدد إدوا بالما مونے وال جمر إن عائب و وبائي بين جُبا جلد لين كي لائے مُليا كي بين و محت بند سرقي ماكن اور جُريات كتي بين بين الركا علية بين جن سي اس

ڰ ويد عاري و ١٩٠١م الله الماري و ١٩٠١م الله الماري الموافق زياده ويناس سنفى الدت المراهاي كي الملال الأمان

کے اللہ ایشاور (ایلتہ ایک) بخار نے دوروان اسمال درج خرارے معمول کے زیادہ بارہ جاتا ہے، میکن

نظام المنفس كسال كاعلاج الك

ے چنز لے کی شدست کم کرتے ہیں يناور (ميلته زيك)رائي نه خاب كي يا خاصيت بناور (ا ی را یز لی شد و اور تراسی اور سالس از المانس کی مال بین آلی سے تجاہد والس ار فی مرد المانکار ویے بین اگر ان کر مالس لیے اللہ و اول فائل اللہ اللہ آل عاقرة توكروالك كالتجالا: ول كروال أ الموات ك في يض كا تعاذريد على بال الله الرجول باختے کا قمل بھر ہائے ہیں دریاضے کے مسأک کوئم کرتے میں نیازوی مور بندیل انسانی جسم ثن با المنايوم كالرابقي الباساء يراما أتال

إلى مين وال كروك لين انباف سن يهيا كرم باني میں اس کے چند آط نے ڈال دیں تطلع اور عظیم مامل کر اہمی ہے بیاتی اسب جائے ہیں کہ جم کو ممل طرح میاف کر ناب لیکن مید ہمت کم اوکوں کو كوريكون كرف كالخاس مناجر ويزشايد ى كول اور دواس ك داره وتحان سد جورجم معام مے کو خسل سے نئے جوانواع دانسام کے سلاف مح لت يم ترم إنى ين تك إال كرنهانا مهابن، اوشن ادر تیل وغیره بازار می دستیاب مجى مفيد ب كاب إله أن كا بكداب نهاف بن ان میں ت ہر ایک کا مخصوص مقصد اور استعال ہے ہم میں ہے بہت اوگ فض اس کی سے لئے یانی میں عشم سے یالیوں کے پند قطرے آپ كوته كان دور كرفي اورجهم كو چسنت منافي

خاور (ایلته زمیک) جسمانی اور روحانی محب کے

آپ دونوں مسی مجامد چوکیدار اور مسی بابر کمال میپ آپریٹر پایک بیلتھ انجینئرنگ دویژن جارسده سے بغیر کمی چینی اطلات کے غیر حاضر ہے آپ دونوں کو وفتر سرکاری چھٹی نبر E-3/06 بوروند 2018-9-11 اور چھٹی نمبر E-3T/08 مورند 3/7/18 كيزر يعاطلاخ دي گي تش يكن اب تك ۔ آپ دونوں حاضر نبیں ہوئے ہیں۔اب آخری بارا خبار کے ذریعے مشتہر کیاجاتا ہے کہ آپ دونوں 15 دنون کے اندر اندر زیر دختی دفتر حاضر موجائے اصورت ویکر E&D رواز کے مطابق کا روائی کی جا ایک جو کے لوکری ہے برخار "كما ما مكتا ہے۔

ېرخاص د عام کو بدرايه اشتبار بدامطل کيا جا تا ہے که ابرکو. ت^{ان}ق فاديست ذويين دا و لیژن بین کی منسوخ شده لاک مائے کی کلیوی شم دیودار بیاز اور فرت وزر کی نیاانی والطالورشرا افلا كتحت برياه كي درج ذيل تاريخون بركو برأ بادكتر منذي اورد زني نعزون الله ينوا بشند هنرات اس نيلاني مين شريك دوكر يولي و مستقة مين-

مرماه کی 10 اور ^و (1) توبرآ إرلكزمنذى حويليان س مادي ۴ است (2)ورگنی لکترمنانی ک

تاریخ مقررہ زیر سرکاری تعلیل کی وجہ سے نیلا کی کنڑ دوسرے دان ں ما نیگی۔مزیر تنصیباً سال جس اند ي بي إيَّا أن شروع : وخصة للأمنذ كالمناعاد في الساعة مُراكره وأنهَ كَا الله والو

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TEICE OF THE EXECUTIVE ENGINEER PUBLIC HEALTH ENGINEERING DIVISION CHARSADDA.

Dated Charsadda the. 5/11/1/2018.

OFFICE ORDER.

Inspite of the fact that final notice issued to the following operational staff through daily news paper "Aaj" in its issue dated 09-10-2018 none of them has reported his arrival for duty.

Name of Official	Designation.
37c. Mujahid S/O Ansear Shah	Chowkidar
Niv. Bahar Kamal S/O Fatelv Ullah Khan.	Pump operator.

Seeping in view their prolong absence and irresponsible attitude the competent authority is please to terminate both the above mentioned officials in the best interest of the Public.

Executive Engineer PHE Division Charsadda

Copy to their.

1. Superintending Engineer PHF, Circle Peshawar for information please.

District Accounts Officer Charsadda for information please.

3. Sub Divisional Officer PHE Sub Division Charsadda / Tangi for information.

Official Concerned.