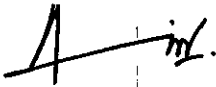


FORM OF ORDER SHEET

Court of _____

Appeal No. 1358/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/06/2023	<p>The appeal of Mr. Muhammad Yasir presented today by Mr. Saifullah Mohmand Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 19-06-2023.</p> <p>By the order of Chairman  REGISTRAR</p>

BEFORE THE HON'BLE SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1358 /2023

Muhammad YasirAppellant

VERSUS

Secretary Education and others.Respondents

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3	Addresses of the parties		9
	Copy of appointment extract of Service Book	"A"	10-12
4	Copy of Show cause notice	"B"	13-14
5	Copy of impugned order	"C"	15-16
6	Copy of departmental Appeal	"D"	17
7	Rejection order on appeal	"E"	18
8	Vakalatnama		19

Appellant 

Dated; 09.06.2023.

Through

Saif Ullah Mohmand
Advocate, Peshawar.

Office;- 1st floor, Al-Mumtaz Hotel, near
Mualvi Jee Hospital, Hashtnagri,
G.T, Road, Peshawar.

Cell No. 0321-9117280

1

BEFORE THE HON'BLE SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 1358 /2023

Muhammad Yasir S/O Lal Badshah ex Behshti (Sweeper)
Government Middle School (GMS) Soganday (Kotha, District Swabi.
.....Appellant

VERSUS

1. Secretary Elementary and Secondary Education, Govt. of Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) Swabi.
4. Headmaster, Government Middle School Soganday (Kotha) District Swabi.
5. Assistant Director (Admn) Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.

.....RESPONDENTS

=====

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL
ACT, 1974 AGAINST THE IMPUNGED ORDER DATED
01.06.2018 OF THE RESPONDENT DEPARTMENT,
WHEREBY THE APPELLANT HAS BEEN AWARDED
MAJOR PENALTY OF REMOVAL FROM SERVICES AS
WELL AS ORDER DATED 31-05-2-23, WHEREBY THE
DEPARTMENTAL APPEAL FILED BY THE APPELLANT
WAS REJECTED BY THE RESPONDENT DEPARTMENT,
WITH NO GOOD REASONS.

=====

2

Prayer in Appeal

ON ACCEPTANCE OF INSTANT APPEAL, THIS HON'BLE TRIBUNAL MAY VERY GRACIOUSLY BE PLEASED TO DECLARE THE IMPUGNED ORDER DATED 01.06.2018 AS WELL AS ORDER DATED 31.05.2023, WHEREBY THE DEPARTMENTAL APPEAL FILED BY APPELLANT WAS REJECTED, AS UNLAWFUL, VOID AB-INITIO AND ULTRA VIRES AND THE APPELLANT MAY BE RE-INSTATED INTO SERVICE WITH ALL BACK BENEFITS.

=====

Respectfully Sheweth:-

1. That the appellant is a natural born and law abiding citizen of Islamic Republic of Pakistan and is entitled to enjoy all the legal and fundamental rights as enshrined and guaranteed under the Constitution of Islamic Republic of Pakistan, 1973.
2. That the appellant was appointed in education department as Sweeper BPS-03 vide office order No. 3520 dated 04-05-2017 under the employee's sons' quota.

(Copy of relevant page of the service book is annexed as Annexure-A).

3. That the impugned final show cause notice was issued to the appellant, and in response to which the appellant appeared and explained his position, however, the respondent No. 3 did not bother to record explanation of the appellant.

(Copy of show cause is annexed as Annexure-"B".)

4. That prior to it, upon an alleged written complaint of respondent No. 4, a so-called departmental enquiry was initiated against the

3

appellant on the basis of false, frivolous and fake allegations of sexually abusing a student of 8th class, which the appellant strongly denies, and the enquiry officer without associating the appellant with enquiry proceedings and observing legal formalities and without conducting proper inquiry and issuing any preliminary show cause notice or charge sheet to the appellant, conducted the alleged enquiry at his back,

5. That on the alleged recommendations of the so-called enquiry officer, the respondent No. 3 issued the impugned order No. 5918-24/ General File No. 25/C-IV dated 01-06-2018 whereby major penalty of removal from service was imposed upon the appellant.

(Copy of impugned order dated 01-06-2018 is annexed as Annexure-C).

6. That feeling aggrieved from the above referred order, the appellant preferred a departmental appeal requesting therein to graciously set aside the harsh and most severe punishment of removal from service, however the same was rejected by the respondent No. 2 vide his impugned order No. 8593 dated 31-05-2023 which was communicated through Assistant Director Elementary and Secondary Education, KP Peshawar.

(Copy of the departmental appeal and order dated 31-05-2023 are annexed as annexure-"D" and "E" respectively.).

7. That the appellant feeling himself aggrieved of the impugned orders dated 01-06-2018 and order dated 31-05-2023, being illegal, hence the appellant is knocking at the door of this Hon'ble tribunal on the following grounds inter-alia:-

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GROUND OF APPEAL

- A. **Because** the impugned orders dated 01-06-2018 and 31-05-2023 of removal from service of the respondent department are against the fundamental rights guaranteed under the Constitution of the Islamic Republic of Pakistan, 1973, hence liable to be struck down.
- B. **Because** the impugned orders dated 01-06-2018 and 31-05-2023 of removal from service of the respondent department are in violation of and against the very spirit of Articles 4, 10-A, & 25 and other relevant Articles of the Constitution of Islamic Republic of Pakistan.
- C. **Because** the impugned orders dated 01-06-2018 and 31-05-2023 of removal from service of the respondent department are against the spirits of natural justice, norms of justice and law of the land, hence liable to be set aside.
- D. **Because** the impugned orders are violative of the fundamental rules and against rules governing the subject.
- E. **Because** the impugned orders dated 01-06-2018 and 31-05-2023 of removal from service of the respondent department are against the dicta laid down by the superior courts of the land, hence untenable in the eyes of law.
- F. **Because** impugned orders dated 01-06-2018 and 31-05-2023 of removal from service of the respondent department are violative

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of the very spirits of service laws, hence unlawful and could be subjected to judicial review of this Hon'ble court.

G. **Because** impugned orders dated 01-06-2018 and 31-05-2023 of removal from service of the respondent department are cursory, non-speaking, issued in a haste and without any lawful authority, hence liable to be struck down by this Hon'ble tribunal.

H. **Because** the contents of the impugned show cause notice and order of removal from service are self contradictory having no nexus with the appellant.

I. **Because** no proper enquiry letter has been issued and communicated to the appellant for the purpose of constitution enquiry officer or conducting any enquiry, which acts and omissions of the respondent department are arbitrary, fanciful and based on malafide.

J. **Because** no proper inquiry has been conducted into the matter to ascertain the real facts and instead a major and harsh penalty of removal from service has been imposed upon the appellant which acts and omissions of the respondents are a nullity in the eyes of law which needs interference of this Hon'ble tribunal.

K. **Because** the respondent department badly failed to bring on record any incriminating material on file or ever bothered to record any statement of the alleged victim or his father or any other independent witness or they could be able to place any

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incriminating material like FIR or daily diary or any kind of evidence or anything in black and white which could connect the appellant with the alleged incident, hence in the absence of all these, whole proceedings and orders are nullity in the eyes of law.

L. **Because** the respondent department cannot snatch butter and bread from the mouth of children and family of the appellant by removing him from service, for the sins never committed by the appellant or his family and that too without any fault at their end.

M. **Because** the basic and fundamental principles of service laws have been ignored rather violated blatantly by the respondent department by not conducting a regular inquiry while awarding the capital punishment of removal from service, hence on this score alone the impugned orders dated 01-06-2018 and 31-05-2023 of removal from service of the respondent department along with all other penal actions initiated, finalized etc against the appellant are illegal, unlawful, hence liable to be set aside by this Hon'ble tribunal.

N. That the grounds raised in the departmental appeal may also be considered as part and parcel of this appeal.

O. That appellant also craves for permission to raise any additional ground during the course of arguments with the permission of this Hon'ble tribunal, which has not specifically been mentioned, in this appeal.

Prayer in appeal

It is, therefore, humbly prayed that on acceptance of this appeal, this Hon'ble

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tribunal may very graciously be pleased to hold and declare that:-

1. The impugned orders dated 01-06-2018 and 31-05-2023 of removal from service of the respondent department are unlawful, void ab initio, ineffective upon the rights of the appellant, and may very graciously be set aside and annulled.
2. That the appellant may very graciously be reinstated into service with all back benefits.
3. Any other relief, this Hon'ble tribunal deem appropriate, in the interest of justice, may be granted to the appellant, to meet the ends of justice.

پاسر
Appellant

Dated:-09.06.2023

Through

Saif Ullah Mohmand
Advocate, Peshawar.

CERTIFICATE

It is certified, as per instructions of my client that the appellant has not earlier filed any appeal in this Hon'ble Tribunal.

Advocate

3

BEFORE THE HON'BLE SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____ /2023


Muhammad YasirAppellant

VERSUS


Secretary Education and others.Respondents

Affidavit

I, Muhammad Yasir S/O Lal Badshah ex-Behshti (Sweeper)
Government Middle School (GMS) Soanday (Kotha, District
Swabi do hereby solemnly affirm and declared on oath that the
contents of this appeal are true and correct to the best of my
knowledge and belief and nothing has been concealed from this
Hon'ble Tribunal,


Deponent

Identified by


Saif Ullah-Mohmand
Advocate, Peshawar.

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**BEFORE THE HON'BLE SERVICE TRIBUNAL,
PESHAWAR**

Service Appeal No. _____ /2023

Muhammad YasirAppellant

VERSUS

Secretary Education and others.Respondents

Addresses of parties

Address of the Appellant

Muhammad Yasir ex-Behshti (Sweeper) Government Middle School (GMS) Soanday (Kotha, District Swabi.

Addresses of the Respondents

1. Secretary Elementary and Secondary Education, Govt. of Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Male) Swabi.
4. Headmaster, Government Middle School Soganday (Kotha) District Swabi.
5. Assistant Director (Admn) Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.

Appellant

Dated: 09.06.2023 Through

Saif Ullah Mohmand
Advocate. Peshawar.

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Annex A

Note: The entries on this page should be renewed or re-attested as least every five years in the signature to lines 11 and 12 should be dated

1. Name Muhammad Yasir

2. NIC No. 16203-0377213-3

3. Race Afghan 4. District of Domicile Swabi

5. Residence village opp. o Memai Teh Tapi Distt Swabi

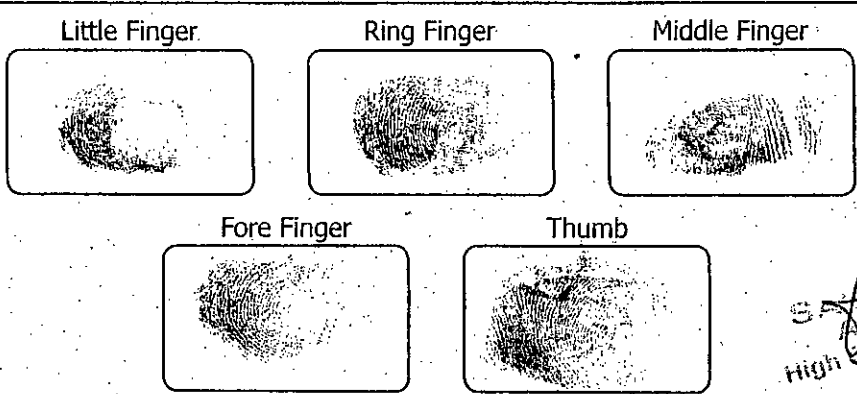
6. Father name and residence LAL BADSHA (Memai)

7. Date of Birth by Christian era as nearly as can be ascertained: 01-01-1997 (1st January NH Ninety seven)

8. Exact height by measurement: 5-7

9. Personal Marks for Identification: NIL

10. Left Hand Thumb and Finger Impression of (Non Gazetted Officer)



Sd/-
Deputy
High Court Registrar

11. Signature of Government Servant: [Signature]

12. Signature & Designation of the Head of the Office, or other attesting officer. [Signature]
Dy: D.E.O (M)
Swabi

9	10	11	12	13		14	15
				Leave			
				Nature & Duration of Leave taken	Allocation of period of leave on average pay up to four months for which leave salary is debit able to another government		
Period	Government to which debit able						
Dy: D.E.O (M) Swabi	30/6/17 017 Revised		Dy: D.E.O (M) Swabi	Appointed against sweeper in BPS-03 (K-8040-325-17790)			
Dy: D.E.O (M) Swabi	30/11/17	Annual Increment	Dy: D.E.O (M) Swabi	at GMS Kisha vide DEOCM Swabi			
Dy: D.E.O (M) Swabi	01/06/2018	Removal from Service	Dy: D.E.O (M) Swabi	Endst. no. 3520 Cdt. 4/5/17 in 257. Retired son Quota at S.No (65)			
				F-883 101 1952/17 630			
							Removal from Service
							Imposed the major penalty of Removal from Service Under Section 4(b)iii of FRT Rules 2011 vide DEO (Male) Swa Endst. No. 5918-24/General File No: C-IV Dated Swabi the 01-6-2018
			SANJILLAN Associate High School Peshawar			Dy: Distt: Education Officer (Male) Swabi	

1	2	3	4	5	6	7	8
Name of Post	Substantive Whether Substantive or officiating and whether permanent or temporary	If officiating state (i) substantive appointment, or (ii) whether service counts for pension under art 371 C.S.R.	Pay in substantive post	Additional pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
Sweeper							
GMS Kisha				Rs= 8040/2 PM		5-5/017	
do							
Sweeper GMS Sofanday Kotla Swabi				Rs= 10000/ P.M		9-7/017 01/12/2017	

S. JILLAH
Advocate
High Court, Peshawar

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Annex B

DISTRICT EDUCATION OFFICER (MALE) RAWALPINDI
Office Phone: Fax: 0092303910083

SCHOOL CAUSE NOTICE

Mr. Muhammad Hanif (C) 1511 Swabi being a competent employee of the Government of Punjab, is hereby notified in response to the Headmaster, (C) 1511 Swabi (C) 1511 Swabi written complaint dated 08/07/2011.

Whereas you, Yaqub Muhammad Sweeper have confessed before the enquiry officer who found the fact that you sexually abused an eighth class student. The incident took place on 03/05/2011 at 03/05/2011.

In response to the above allegation, which has been proved, a heavy major penalty of removal from service under 4 & D rules, 2011 should not be imposed upon you, which has also been recommended by the Enquiry Officer. If you have something in your support submit it in written form to this office within 07 days. If you opt to be heard in person, then attend this office on any working day between 10:00 AM to 04:00 PM.

GEHANGHRI KHAN
DISTRICT EDUCATION OFFICER
(MALE) RAWALPINDI

- 1. To the Headmaster, (C) 1511 Swabi
- 2. To the Enquiry Officer, (C) 1511 Swabi
- 3. To the District Education Officer, (C) 1511 Swabi
- 4. To the District Education Officer, (C) 1511 Swabi

[Signature]
DISTRICT EDUCATION OFFICER
(MALE) RAWALPINDI

SAIF ULLAH
Advocate
19, Court Peshawar

[Handwritten notes in Urdu]

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BETTER COPY PAGE# 30
DISTRICT EDUCATION OFFICER (MALE) SWABI
Office Ph & Fax No. 0938280239

SHOW CAUSE NOTICE:

I, Mr. Jehanzeb Khan DEO (M) Swabi being a competent authority to serve upon you that instant show cause notice in response to the Headmaster, GST, Soganday (swabi) written complaint dated 08-05-2018.

Whereas you Yasir Muhammad Sweeper have confessed before the enquiry officer who found the fact that you sexually abused an eighth Class student. The incident took place on 03-05-2018 at 02:00 PM.

In response to the above allegation which has been proved and why the major penalty of removal from service under E & D rules, 2011 should not be imposed upon you, which has also been recommended by the Enquiry Officer. If you have something in your support submit it in written form to this office within 07 days or would you opt to be heard in person, then attend this office on any working days *within the office hours upto 24/5/2018*

(JEHANGIR KHAN)
DISTRICT EDUCATION OFFICER
(MALE) SWABI

Endst No.

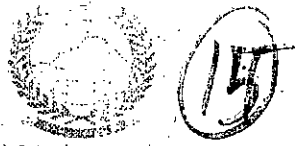
Copy of the above is forwarded for information and necessary action to the:

1. Headmaster GMS Soganday with reference to his complaint.
2. Yasir Muhammad Sweeper, GMS Soganday (Swabi).

-sd-

DISTRICT EDUCATION OFFICER
(MALE) SWABI

SAIF ULLAH
Advocate
High Court Peshawar



DISTRICT EDUCATION OFFICE (MALE) SWABI
Office phone & fax No 093240239. emis_swabi@peshawar.com

REMOVAL FROM SERVICE.

Annex C

WHEREAS, Mr. Muhammad Yasir Sweeper Govt Middle School Soganday (Kotha) Swabi was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 on account of immoral conduct.

AND WHEREAS Enquiry was conducted against the accused official Mr. Muhammad Yasir Sweeper Govt Middle School Soganday (Kotha) Swabi on the written complaint of Headmaster concerned about his involvement in immoral activity.

AND WHEREAS the accused official Mr. Muhammad Yasir Sweeper confessed openly/clear cut before the enquiry officer which is available on record and failed to defend himself in the response of show cause notice.

NOW THEREFORE, in exercise of the powers conferred under section 4(d)(ii) of the Khyber Pakhtunkhwa Removal from service under (Efficiency & Discipline) Rules 2011, the competent authority is pleased to impose the major penalty of removal from service on Mr. Muhammad Yasir Sweeper, Govt Middle School Soganday (Swabi) with immediate effect.

(JELANGIR ABAN)
DISTRICT EDUCATION OFFICER
(MALE) SWABI

Encl: No. 5918-24 General File, In. 25/ L-IV dated Swabi then: 01/06/2018.

Copy of the above is forwarded for information and n/action to the -

1. Director Elementary & Secondary Education Khyber Pukhtunkhwa, Peshawar
2. District Accounts Officer, Swabi
3. Headmaster, GMS Soganday (Kotha) Swabi.
4. District Monitoring Officer, Swabi
5. ADEO (B&A/Estab) Local Office.
6. Superintendent (Secondary) Local Office.
7. Mr. Muhammad Yasir Sweeper, Govt Middle School Soganday (Kotha) Swabi (Under Registered cover)

(JELANGIR ABAN)
District Education Officer
Peshawar

(JELANGIR ABAN)
DISTRICT EDUCATION OFFICER
(MALE) SWABI

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BETTER COPY PAGE# 15
DISTRICT EDUCATION OFFICER (MALE) SWABI
(Office Ph & Fax No. 0938280239. emis_swabi@yahoo.com)

REMOVAL FROM SERVICE:

WHEREAS, Mr. Muhamma'l Yasir Sweeper, Govt: Middle Government School Soganday (Kotha) was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011 on account of Moral Turpitude.

AND WHEREAS Enquiry was conducted against the accused official Mr. Muhammad Yasir Sweeper Govt: Middle School Soganday (Kotha) Swabi on the written complaint of Headmaster concerned about his involvement in immoral activity.

AND WHEREAS, the accused official Mr. Muhammad Yasir Sweeper confessed openly/clear cut before the enquiry officer which is available on record and failed to defend himself in the response of show cause notice.

NOW THEREFORE, in exercise of the powers conferred under Section 4(b)(iii) of the Khyber Pakhtunkhwa Removal from service under (Efficiency & Discipline) Rules 2011, the competent authority is pleased to impose the major penalty Removal from service upon Mr. Muhammad Yasir Sweeper, Govt: Middle School Soganday (Swabi) with immediate effect.

(JEHANGIR KHAN)
DISTRICT EDUCATION OFFICER
(MALE) SWABI

Endst No. 5918-24/General File No. 25/C-IV dated Swabi the: 01/05/2018

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

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer, Swabi.
3. Headmaster GMS Soganday (Kotha) Swabi.
4. District Monitoring Officer, Swabi.
5. ADEO (B&A/Estab) Local Office.
6. Superintendent (Secondary) Local Office.
7. Yasir Muhammad Sweeper, GMS Soganday (Kotha) Swabi.
(Under Registered cover)

-sd-

DISTRICT EDUCATION OFFICER
(MALE) SWABI

~~SAFULLAN~~
Advocate
High Court Peshawar

محرمیت ضیاء ڈائریکٹر ایجوکیشن سروسز

(17)

Annex D

قلمانہ اپیل بر خلاف منسلق نمبر 06/01
2018

ضیاء ضیاء

سائل حسب ذیل عمر میں ارسال ہے۔

1۔ یہ کہ سائل گورنمنٹ مڈل سکول سوگندے (کوٹھا)، ہوابی میں ریگورڈ فار واپس ملازم تھا۔

2۔ یہ کہ سائل کو مورخہ 06/01/2018 کو کھوارا بکٹر فہ کاروانی سروس سے ہٹایا گیا تھا اور ایک سن گھنٹہ اور فود سافٹ سٹیم کا التزام سائل پر لگایا گیا تھا۔ جسکی بابت ٹاؤٹی پولیس میں رپورٹ موجود ہے اور ٹاؤٹی عینی شواہد موجود ہے۔

3۔ یہ کہ سائل ایک نریب اور ناوار گھرانے سے تعلق رکھتا ہے اور اپنے گھرانہ داخلہ کھینچے ہے۔ اور سروس سے درخواست دینے کی وجہ سے سائل اور اس کے خاندان والوں کو اس ہنگامی کے دور میں سافٹ نکالیف اور طبیوں کی مسافرا کرنا پڑ رہا ہے۔

4۔ یہ کہ انوائٹری اور منسلق درخواستگی سروس سائل پر زبردستی کھینچنے دیا گیا ہے جس سے سائل نے سراسر سے انکار کیا ہے۔

لہذا استدعا کی جاتی ہے کہ منظر اولیٰ میں اپیل پر منسلق نمبر 06/01/2018 کے مکالمہ کے حوالے سے سائل کو اپنے سروس پر جمعہ سابقہ مراعات دربارہ بحال کرنے کے احکامات صادر فرمایا جائے۔

مورخہ 03-03-2018

محمد یاسر

ایڈوانس

محمد یاسر ولد لعل بادشاہ



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. _____ /F.No.432 /A-20/C-IV/Swabi

Dated Peshawar the 31/5/ /2023

Phone: 091-9225344

Email: ddadm.ee@gmail.com

To

The District Education Officer
(Male) Swabi.

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Annex E

Subject: **DEPARTMENTAL APPEAL**

Memo:

I am directed to refer to your letter No 4437 dated 17/04/2023 on the subject cited above and to ask you that the appeal in r/o **Mr. Muhammad Yasir Ex-Behshti GMS Sogandey, District Swabi** has been examined/analyzed by this office. Hence inform the appellant concerned that his appeal has been **rejected** by the appellate authority.

sd/-
Assistant Director (Admn)

Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

8593
Endst; No. _____/

Copy forwarded to the:-

1. Mr. Muhammad Yasir Ex-Behshti GMS Sogandey, District Swabi.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

Assistant Director (Admn)

Directorate E& Secondary Education
Khyber Pakhtunkhwa, Peshawar

SAIF ULLAH
Advocate
High Court Peshawar

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WAKALATNAMA

BEFORE THE Service Tribunal Peshawar

No. _____/2023

Muhammad Yasir (Petitioner/Appellant)

VERSUS

Secretary Education etc (Respondent/ defendant)

I/We Muhammad Yasir s/o Lal Badshah
R/O District Swabi

In the above noted Service Appeal do hereby appoint and constitute **Mr. Saif Ullah Mohmand** advocates as my/our Counsel in subject proceedings and authorize him to appear, plead etc compromise, withdraw or refer the matter for arbitration for me/us without any liability for his default and with the authority to engage/appoint any other Advocate/ Counsel at my/our expense and receive all sums and amounts payable to me/us and to all such acts, which he may deem necessary for protecting my/our interests in the matter. He is also authorize to file Appeal, Revision, Review, Application for Restoration or Application for setting-aside-ex-parte decree proceedings on my/our behalf.

Dated: 9/6/2023

ياسر

(Client)

Saif Ullah Mohmand
Mr. Saif Ullah Mohmand)
Advocate, Peshawar

محمد ياسر

Office Address:- 201, 1st Floor, Al-Mumtaz Hotel, near Mualvi Jee Hospital,
G.T. Road, Peshawar.

Phone No.0321-9117280 0305-9385467