

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

**Service Appeal No. 1372/2018**

**BEFORE:**      ROZINA REHMAN                          ---      MEMBER(J)  
                                 MUHAMMAD AKBAR KHAN---      MEMBER(E)

Ghucha Din, PSHT (BPS-15), GPS Chagam No. 2, Poran, District Shangla .....(*Appellant*)

**VERSUS**

1. The Director E&SE Department Khyber Pakhtunkhwa Peshawar.
2. The District Education Officer, District Shangla.
3. The District Accounts Officer, District Shangla.....(*Respondents*)

**Present:**

KAMRAN KHAN,  
Advocate

---      For Appellant

ASIF MASOOD ALI SHAH,  
Deputy District Attorney,

---      For respondents

Date of Institution.....06.11.2018  
Date of Hearing.....03.04.2023  
Date of Decision.....03.04.2023

SCANNED  
KE ST  
Peshawar

**JUDGMENT**

**MUHAMMAD AKBAR KHAN, MEMBER(E):-** The instant service appeal has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as under;

*“That on acceptance of this appeal the impugned orders dated 14.05.2008 and 08.10.2018 may very kindly be set aside and the respondents may be directed to treat the intervening period i.e. w.e.f. 14.05.2013 to 15.04.2015 may be treated as period spent on duty. That it is*





*further prayed that the recovery amounting to Rs. 28000/- in terms of PTC fund may be declared as illegal and may be set at naught. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant."*

02. Brief facts of the case are that the appellant while performing his duty as PSHT, GPS Kooch Puran was charge sheeted on the allegations of absence, misconduct and inefficiency during service. When he was posted at GPS Kooch Puran, disciplinary action was taken against him, he was awarded four penalties on 26.05.2015 which included recovery of salary, demotion, transfer and recovery of school Fund. The said penalties were challenged in the first round of litigation before the Service Tribunal through service appeal No. 1090/2015 and the Service Tribunal accepted his appeal on 31.01.2018, set aside the penalties awarded to the appellant and the department was left at liberty to hold de-novo proceedings within a period of ninety days from the date of receipt of the judgment. In pursuance of the directions contained in the judgment, respondent department conducted de-novo inquiry and issued the impugned order dated 14.05.2018 whereby, the appellant was awarded the minor penalty of recovery of salaries w.e.f. 15.04.2013 to 23.04.2015 converting the period into leave without pay and the recovery of 28000/- PTC Fund to be deposited in PTC Account. Feeling aggrieved the appellant filed departmental appeal on 11.06.2018 which was rejected on 08.10.2018 hence the instant service appeal.



03. Notices were issued to the respondents, who submitted their comments, wherein they refuted the assertions raised by the appellant in his appeal. We have heard arguments of learned counsel for the appellant and learned Deputy District Attorney and have gone through the record with their valuable assistance.

04. Learned counsel for the appellant contended that the impugned orders dated 14.05.2018 and 08.10.2018 are against the law, facts, norms of natural justice, hence not tenable and are liable to be set aside. That the appellant has not been treated in accordance with law, rules and respondents have violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan. Learned counsel for the appellant contended that proper charge sheet/statement of allegations was not issued to the appellant. No Show Cause Notice was issued to the appellant and no chance of personal hearing provided to the appellant. He has, therefore, been condemned unheard. He submitted that no regular inquiry has been conducted in the matter which is mandatory as per the judgment of the Supreme Court of Pakistan. In the last, learned counsel for the appellant prayed that the impugned orders dated 14.05.2018 and 08.10.2018 are against the law and are liable to be set aside. To strengthen his arguments, he relied on 2000 SCMR 1743, 2007 SCMR 1860, 2003 PLC (C.S) 365, 2020 PLC (C.S) 1291 & 2011 PLC (C.S) 1111.

05. Learned Deputy District Attorney argued that the respondent department conducted de-novo inquiry as per the judgment of Service Tribunal in Service Appeal No. 1090/2015 dated 13.01.2018. He next argued that the de-novo inquiry was conducted and the appellant was



recommended for imposition of minor penalty of recovery of salaries w.e.f. 15.04.2013 to 23.04.2015 treating the period as leave without pay and the recovery of 28000/- as PTC Fund to be deposited in PTC Account. He submitted that the proper charge sheet/statement of allegations as well as Show Cause Notice was served on the appellant. Proper chance of personal hearing was given to the appellant but he failed to justify his position. He further submitted that all the codal formalities were fulfilled and the proceedings were carried out as per Government of Khyber Pakhtunkhwa (Efficiency & Discipline) Rules, 2011. The impugned orders is therefore legal, passed by the competent authority according to law and rules, therefore, be maintained in favor of the respondent department and the service appeal be dismissed.

06. The charge sheet/statement of allegations against the appellant contained the following four charges/allegations:-

- a) Guilty of misconduct as per visit report of SDEO(M) Alpurai vide letter under Endst: No. 806 dated: 12/05/2015 alongwith statement of School PTC, School staff as well as the statement of an alternate teacher working in the school.*
- b) Inefficiency as no proper record was maintained during utilization of huge amount of DFID/PTC Fund while carrying out the construction work in the concerned school.*
- c) Habitual Absenteeism w.e.f. 15/03/2013 to 23/04/2015 (739 days) i.e 2 years and 09 days.*
- d) Embezzlement of PTC Fund amounting to Rs. 28000/- as per report of ASDEO(M) Circle Puran dated 09/10/2015.*





Most of the contents of the charges/allegations are generalized which is quite difficult to be substantiated with plausible evidence and as such the major part of the inquiry report contains generalized statements. Quite considerable part of the inquiry report deals with procedural matters/instructions how to conduct inquiry. Instead of focusing on the conduct of the accused civil servant viz-a-viz the charges/allegation the inquiry committee conducted the inquiry in fact finding style pointing out some other supervisory officers of the department responsible for inefficiency and lack of interest towards their official responsibilities. Nothing is available on record whether the department has taken any action against them. The charges of absence and embezzlement of Rs. 28000 on part of the appellant were quite specific and measurable to prove or otherwise. The appellant produced documentary evidence of his presence for the period of his alleged absence from 15.04.2013 to 23.04.2015. The evidence included his signature on the attendance register/students Admission Register and School leaving Certificates issued to the school leaving students. The appellant produced these evidence with his written statement to the inquiry committee as well as the competent authority with reply to the show cause notice. These evidentiary documents were submitted to the appellate authority alongwith appeal by the appellant. At all the three stages these evidences were neither taken into consideration nor refuted. Similarly the documentary evidence regarding expenditure incurred on construction of boundary wall of the Primary School out of PTC Fund produced by the appellant was not analyzed properly to substantiate the allegation of



embezzlement of RS 28000. In fact no proper audit of utilization of the PTC Fund was carried out to substantiate the charge.

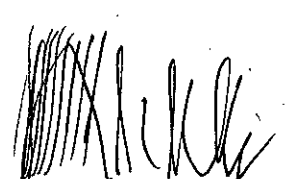
07 In the given circumstances we reach the conclusion that the allegations/charges against the appellant have not been proved through evidence. The evidence produced by the appellant available on record were not scrutinized at the level of inquiry committee, competent authority and the appellate authority which tantamount to the condemning the appellant unheard.

08. In view of what has been discussed, we accept the appeal in hand as prayed for and set aside the orders dated 14.05.2018 and 08.10.2018 with all back benefits to the appellant. Costs shall follow the event. Consign.

09. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 3<sup>rd</sup> day of April, 2023.*

SCANNED  
KPST  
Peshawar

  
(ROZINA REHMAN)  
MEMBER (J)

  
(MUHAMMAD AKBAR KHAN)  
MEMBER (E)

\*Kamranillah\*



**ORDER**

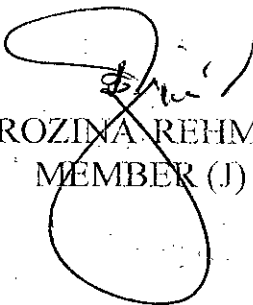
03.04.2023


01. Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. Arguments heard and record perused.

02. Vide our detailed judgment of today separately placed on file consisting of (06) pages, we accept the appeal in hand as prayed for and set aside the orders dated 14.05.2018 and 08.10.2018 with all back benefits to the appellant. Costs shall follow the event. Consign.

03. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal this 3<sup>rd</sup> day of April, 2023.*

SCANNED  
KFST  
Peshawar

  
(ROZINA REHMAN)  
MEMBER (J)

  
(MUHAMMAD ARBAR KHAN)  
MEMBER (E)

\*Kamranullah\*

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22<sup>nd</sup> Dec. 2022 Counsel for the appellant present. Mr. Muhammad Riaz  
Khan Paindakhel, Assistant Advocate General for the respondents  
present.

Learned counsel for the appellant requested for adjournment  
in order to further prepare the brief. The appeal pertains to the year  
2018 and last opportunity is granted to learned counsel for the  
appellant for arguments on the next date, failing which the case will  
be decided on the basis of available record. To come up for  
arguments on 23.02.2023 before the D.B.

SCANNED  
KPST  
Peshawar

  
(FAREEHA PAUL)  
Member(E)

  
(ROZINA REHMAN)  
Member (J)

23.02.2023

Bench is incomplete, therefore, the case is adjourned to  
03.04.2023 for the same as before.

  
Reader

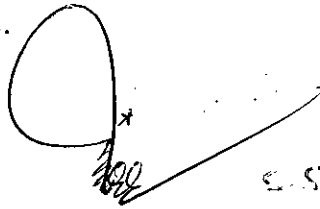




27.10.2022

Learned counsel for the appellant present. Mr. Luqman Shah, Litigation Officer alongwith Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments before the D.B on 16.11.2022.



(Mian Muhammad)  
Member (E)



(Salah-ud-Din)  
Member (J)

16.11.2022

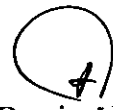
Appellant present in person.

Muhammad Jan learned District Attorney for respondents present.

Former made a request for adjournment that his counsel is not available today. Adjourned. To come up for arguments on 22.12.2022 before D.B.



(Fareeha Paul)  
Member (E)



(Rozina Rehman)  
Member (J)

SCANNED  
KPST  
Peshawar

SCANNED  
KPST  
Peshawar

22.11.2021

Proper D.B is not available, therefore, case is adjourned to // . 2 .2022 for the same.

  
READER


Due to retirement of the honorable Chairman the case is adjourned to come up for the same as before on 8-6-22

  
Reader

08.06.2022

Clerk of learned counsel for the appellant present. Mr. Luqman Shah, Litigation Officer alongwith Mr. Riaz Ahmad Painsakhel, Assistant Advocate General for the respondents present.

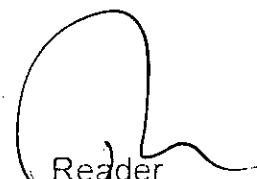
Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up arguments on 29.08.2022 before the D.B.

  
(Fareeha Paul)  
Member (E)

  
(Salah-ud-Din)  
Member (J)

29.08.2022

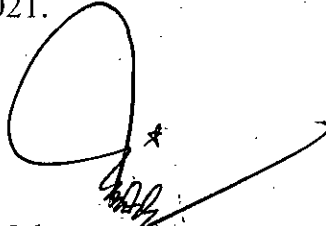
Bench is incomplete, therefore, case is adjourned to 27.10.2022 for the same as before.

  
Reader

26.05.2021

Mr. Afrasyab Khan Wazir, junior <sup>of learned</sup> counsel for the appellant present. Mr. Javed Ullah, Assistant Advocate General for respondents present.

Former sought adjournment on the ground that learned senior counsel was busy before the Dar-ul-Qaza, Swat. Adjourned. To come up for arguments before D.B on 14.09.2021.



(Mian Muhammad)  
Member (E)



(Salah Ud Din)  
Member(J)

14.09.2021

Appellant alongwith Mr. Kamran Khan, junior of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, 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 the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments before the D.B on 22.11.2021.



(ATIQU-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)



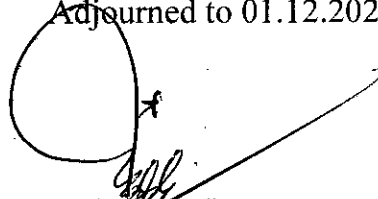
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

24.09.2020

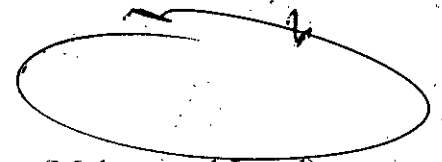
Mr. Mir Zaman Safi, Advocate junior of Mr. Noor Muhammad Khattak, Advocate on behalf of the appellant is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General is present.

Junior to counsel for the appellant is seeking time for arguments as his senior counsel was busy before the Hon'ble Peshawar High Court, Peshawar.

Adjourned to 01.12.2020 for arguments before D.B.



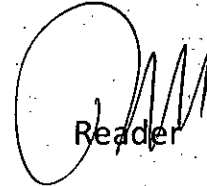
(Mian Muhammad)  
Member (E)



(Muhammad Jamal)  
Member(J)

26.12.2020

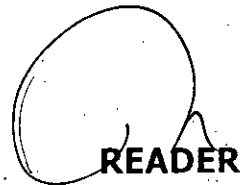
Due to pandemic of Covid-19, the case is adjourned to 12.02.2021 for the same as before.



Reader

12.02.2020

Due to COVID-19, the case is adjourned for the same on 26.05.2021.

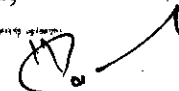


READER

14.01.2020

Appellant absent. Learned counsel for the appellant absent. Mr. Muhammad Jan learned Deputy District Attorney for the respondents present. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings/arguments on 11.03.2020 before D.B. Appellant be put to notice for the date fixed,

  
Member

  
Member

11.03.2020

Junior to counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney present. Junior to counsel for the appellant seeks adjournment as senior learned counsel for the appellant is not available. Adjourn. To come up for arguments on 29.04.2020 before D.B.

  
Member

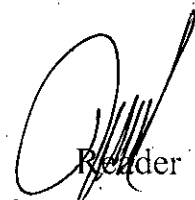
  
Member

29.04.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 05.08.2020 before D.B.

05.08.2020

Due to summer vacation case to come up for the same on 16.10.2020 before D.B.

  
Reader

  
Reader

25.06.2019 Counsel for the appellant and Addl: AG for respondents present. Written reply/comments not submitted. Requested for adjournment. Adjourned. Case to come up for written reply/comments on 20.08.2019 before S.B.



(Ahmad Hassan)  
Member

20.08.2019 Junior to counsel for the appellant and Mr. Muhammad Riaz Khan Paindakhel, Assistant AG alongwith Luqman Shah, PST for the respondents present.

Representative of the respondents has submitted joint parawise comments on behalf of respondents which are placed on record. To come up for arguments before D.B on 12.11.2019. The appellant may submit rejoinder within a fortnight, if so advised.



Chairman

12.11.2019 Appellant in person present. Mr. Zia Ullah learned Deputy District Attorney alongwith M/S Shehan Shah SET and Omer Hayat Admin Officer for the respondents present. Appellant submitted rejoinder which is placed on file and seeks adjournment. Adjourn. To come up for arguments on 14.01.2020 before D.B



Member



Member

25.04.2018

Counsel for the appellant present. Preliminary arguments heard and case file perused. Learned counsel for the appellant argued that on the basis of allegations contained in the charge sheet and statement of allegations, various penalties were awarded to him vide impugned order dated 26.05.2015. Feeling aggrieved, he filed departmental appeal on 26.05.2015 followed by service appeal on 1090/2015, which was accepted by this Tribunal vide judgment dated 13.01.2018. In pursuance of the directions contained in the said judgment de-novo enquiry was conducted minor penalty of recovery of salary w.e.f 14.05.2013 to 15.04.2015 was imposed on him vide impugned order dated 14.05.2018. Feeling aggrieved, he filed departmental appeal on 11.06.2018 and was rejected on 08.10.2018, hence, the present service appeal. Impugned order is against the law and rules. Codal formalities were not observed before awarding the penalty. He was condemned unheard. A separate application for suspending the operation of impugned order has also been submitted.

Points urged need consideration. Admit, subject to deposit of security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 24 .06.2018 before S.B. Notice of this application be also issued to the respondents for the date fixed.

Appellant Deposited  
Security & Process Fee

(AHMAD HASSAN)  
MEMBER

19.04.2019

Learned counsel for the appellant and Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Luqman Shah, PAT for respondents present. Representative of the respondents department stated that relevant record has already been placed on file. Learned counsel for the appellant has not gone through the record furnished by representative of the respondents. Adjourn. To come up for preliminary hearing on 24.04.2019 before S.B. Representative of the respondents stated that he came from District Shangla. Representative is relieved from attendance in the present case till further order.

Member

24.04.2019

Counsel for the appellant and Addl: AG for respondents present. Learned counsel for the appellant seeks adjournment as he has not prepared the case. Adjourned. Case to come up for preliminary hearing on tomorrow i.e. 25.06.2019 before S.B.

(Ahmad Hassan)




Member



Form- A  
FORM OF ORDER SHEET

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

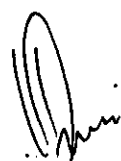
Case No. 1372/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	06/11/2018	<p>The appeal of Mr. Ghuncha Din presented today by Mr. Noor Muhammad Khattak 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 6/11/18</p>
2-	17-11-2018	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>3-12-18</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	03.12.2018	<p>Nemo for appellant present. It seems that learned counsel for the appellant or the appellant had not been served for the hearing fixed today. Adjourned. Notice be issued to the appellant/his counsel for 17.01.2019 for preliminary hearing before S.B.</p> <p style="text-align: right;"> Chairman</p>

17.1.2019

Counsel for the appellant present.


Notice be issued to respondent No. 2 for production of record pertaining to office order No. 9333-40 dated 14.05.2018 (departmental proceedings against the appellant) for 21.02.2019 before S.B.

  
Chairman

21.02.2019

Counsel for the appellant and Addl. AG alongwith Luqman Shah Dental Technician for the respondents present.

Representative of respondents though is in attendance but is not in possession of relevant record. He has been directed to produce the same on next date of hearing. Adjourned to 26.03.2019 before S.B.

  
Chairman

26.03.2019

Learned counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Luqman Shah Assistant present. Representative of the respondent department submitted record placed on file and copy of which is also given to learned counsel for the appellant. Adjournment requested. Adjourned to 19.04.2019 before S.B.

  
Member

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

APPEAL NO. 1372 /2018

**GHUNCHA DIN**

**VS**

**EDUCATION DEPTT:**

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**APPELLANT**

**THROUGH:**

**NOOR MOHAMMAD KHATTAK,  
ADVOCATE**

Flat No. 3, Upper Floor,  
Islamia Club Building,  
Khyber Bazar, Peshawar  
0345-9383141

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

Khyber Pakhtunkhwa  
Service Tribunal

**APPEAL NO. 1372 /2018**

Diary No. 1610

Mr. Ghuncha Din, PSHT (BPS-15),

Dated 06-11-2018

GPS Chagam No.2, Poran, District Shangla.....**APPELLANT**

**VERSUS**

- 1- The Director E&SE Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The District Education Officer, District Shangla.
- 3- The District Accounts Officer, District Shangla.

.....**RESPONDENTS**

**APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 14.05.2018 WHEREBY MINOR PENALTY OF RECOVERY OF SALARIES W.E.F.15.4.2013 TO 23.4.2015 HAS BEEN IMPOSED ON THE APPELLANT AND AGAINST THE APPELLATE ORDER DATED 08.10.2018 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT HAS BEEN REJECTED ON NO GOOD GROUNDS**

**PRAYER:**

That on acceptance of this appeal the impugned orders dated 14.05.2018 and 08.10.2018 may very kindly be set aside and the respondents may be directed to treat the intervening period i.e. w.e.f. 14.5.2013 to 15.4.2015 may be treated as period spent on duty. That it is further prayed that the recovery amounting to Rs.28000/= in terms of PTC fund may be declared as illegal and may be set at naught. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

**R/SHEWETH:**

**ON FACTS:**

1- That appellant is the employee of the respondent Department and is serving the respondent Department as PST quite efficiently and upto the entire satisfaction of his superiors.

2- That during performing duties as PSHT, GPS Kooch Puran, was charge sheeted on the allegations of absentia and of misconduct & inefficiency during service. That due to above mentioned allegations the appellant was recommended for below punishments vide impugned order dated 26.05.2015:-

- i. Recovery of Salaries for a period of two (02) years and (15) fifteen days i.e. (745 days) w.e.f. 15/4/2013 to 30/4/15 amounting to Rs. 10,18,403/-.

Filed to-day  
Received  
06/11/18

- ii. Demotion from BPS-15 to 12.
  - iii. Transfer from GPS Kooch Puran to GPS Alpuri No.2 upon.
  - iv. Recovery of School PTC Fund.
- Copies of the charge sheet and impugned order dated 26.05.2015 are attached as annexure.....**A & B.**

3- That appellant feeling aggrieved from the impugned order dated 26.05.2015 filed Departmental appeal followed by service appeal No.1090/2015 which was accepted and set aside the above mentioned penalties vide judgment dated 31.01.2018. Copies of the Departmental appeal, service appeal and judgment are attached as annexure.....**C, D & E.**

4- That after the judgment dated 31.01.2018 the respondents conducted Denovo inquiry in absence of the appellant and finally the inquiry committee recommended the appellant for minor penalty of recovery of salaries w.e.f. **14.5.2013 to 15.4.2015** inspite of the fact that the appellant had regularly served the respondent Department during the mentioned period. Copies of the inquiry report and record are attached as annexure ..... **F and G.**

5- That in light of the recommendations of the inquiry committee the respondents passed the impugned order dated 14.05.2018 whereby minor penalty of recovery of salaries w.e.f. **14.5.2013 to 15.4.2015** inspite of the fact that the appellant had regularly served the respondent Department during the mentioned period. Copy of the impugned order is attached as annexure..... **H.**

6- That feeling aggrieved from the impugned order dated 14.05.2018 the appellant filed Departmental appeal before the appellate authority but the same was rejected vide order dated 08/10/2018 on no good grounds. Copies of the Departmental appeal along with other record and rejection order are attached as annexure.... **I & J.**

7- That appellant feeling aggrieved and having no other remedy filed the instant service appeal before this august Tribunal on the following grounds amongst the others..

**GROUND:**

A- That the impugned orders dated 14.05.2018 and 08.10.2018 issued by the respondents are against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.

B- That appellant has not been treated by the respondents in accordance with law and rules on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

- C- That the minor penalty regarding recovery of salaries has been issued without perusal of the relevant record produced by the appellant, therefore the impugned order dated 14.5.2018 is not tenable and liable to be set aside.
- D- That the respondents acted in arbitrary and malafide manner while issuing the impugned order dated 14.05.2018, therefore the same is not tenable in the eye of law and is liable to be set aside.
- E- That neither charge sheet and stamen of allegation nor show cause notice has been served on the appellant prior to the impugned order dated 14.5.2018.
- F- That no chance of personal hearing/defense has been given to the appellant prior to the impugned order dated 14.5.2018.
- G- That no regular Denovo inquiry has been conducted in the matter which is as per Supreme Court Judgments is necessary in punitive actions against the civil servant.
- H- That the impugned order dated 14.5.2018 is not in line with the judgment dated 31.1.2018 passed by this august Tribunal.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

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

Dated: 05.11.2018

**APPELLANT**

  
**GHUNCHA DIN**

**THROUGH:**

  
**NOOR MOHAMMAD KHATTAK**

**&**

  
**MUHAMMAD MAAZ MADNI**  
**ADVOCATE**

**BEFORE THE KHYBER PAKHTUNKHEWA SERVICE TRIBUNAL**  
**PESHAWAR**

**APPEAL NO. \_\_\_\_\_/2016**

**GHUNCHA DIN**

**VS**

**EDUCATION DEPTT:**

**APPLICATION FOR SUSPENSION OF THE**  
**IMPUGNED ORDER DATED 14.05.2018 TILL THE**  
**DISPOSAL OF THIS APPEAL**

**R/SHEWETH:**

- 1- That the appellant filed above mentioned appeal along with this application before this august service Tribunal in which no date has been fixed so far.
- 2- That all the three ingredients necessary for the stay is in favor of the appellant.
- 3- That the impugned recovery order dated 14.05.2018 has been issued by the respondent No.2 in utter violation of law and Rules.
- 4- That the grounds of main appeal is also be considered as integral part of this application.

It is therefore, most humbly prayed that on acceptance of this application the order dated 14.05.2018 may very kindly be suspended till disposal of this appeal.

Dated: 06.11.2018.

**APPELLANT**

*Ghuncha*  
**GHUNCHA DIN**

**THROUGH:**

*N.M. Khattak*  
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**



OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M\F) SHANGLA

CONTACT NO. (0996) 850639. 851108- Fax # 851108

No. \_\_\_\_\_ Dated / / 2013.

CHARGE SHEET.

1) I Mohammad Saeed DEO E&S Education  
Deptt: Shangla as competent authority, hereby charge you, Mr. Ghuncha  
Din PST GPS Ko (Puran) as follows:-

That you, committed the following irregularities / omissions / in efficiency / misconduct /  
corruption.

- (i) You remained absent from duty after your posting in  
GPS Ko (Puran).
- (ii) You committed of misconduct & in efficiency during  
your service.

2) By reason of the above, you appear to be guilty of Misconduct,  
in efficiency & corruption under rule 3 of the Khyber Pakhtunkhwa Government Servant  
(Efficiency and Discipline) Rules 2011 and have rendered your self liable to all or any of  
the penalties specified in rules 4 of the rules ibid.

3) You are, therefore, required to submit your written defense  
within seven days of the receipt of this Charge Sheet to the inquiry Officer/ inquiry  
committee, as the case may be.

4) Your written defence, if any, should reach the inquiry  
Officer/inquiry committee, within the specified period, failing which it shall be  
presumed that you have no defence to put in & in that case ex-parte action shall be  
taken against you.

5) Intimate whether you desire to be heard in person.?

6) A statement of allegations is enclosed.

19/11/13  
DISTRICT EDUCATION OFFICER  
DISTRICT SHANGLA

ATTESTED





(6)

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M\F) SHANGLA

CONTACT NO. (0996) 850639. 851108- Fax # 851108

No. \_\_\_\_\_ Dated / /2013.

DISCIPLINARY ACTION.

1) I Mr. Mohammad Saeed Khan DEO (M) Shangla as competent authority, is of the opinion that Mr Ghuncha Din PST GPS Ko (P) is rendered himself liable to be proceeded against, as he committed the following acts /omissions, within the meaning of rules of the Khyber Pukhtunkhwa Government Servant (Efficiency and Discipline Rules, 2011.

STATEMENT OF ALLEGATIONS

I He posted in GPS Ko (Puran) after his up gradation. but he did not attend his duty regularly & when he was asked to change his attitude he used abused language to the area peoples as they stated

II \_\_\_\_\_

2) For purpose of inquiry against the said accused with reference to the above allegations, an inquiry officer/inquiry committee, consisting of the following, is constituted under rules 10(1)(a) of the ibid rules.

I Mr. Akbar Ali SST GMS Soor Kamar (Puran)

II \_\_\_\_\_

3) The inquiry Officer/Inquiry committee, shall, in accordance with the provisions of the ibid rules, provide reasonable opportunity of hearing to the accused, record its finding and make, Within thirty days of the receipt of this order, recommendations as to punishment or other appropriate action against the accused.

4) The accused shall join the proceedings on the date, time & place fixed by the inquiry Officer/inquiry committee as the case may be.

19/11/2013

DISTRICT EDUCATION OFFICER  
DISTRICT SHANGLA

ATTACHED



**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M) SHANGLA**

*B-7*  
*19*

**CONTACT NO. (0996) 850639. 851108- Fax # 851108**

**No**

**Dated**

**OFFICE ORDER:-**

WHEARAS, upon the receipt of a comprehensive/ detailed report grounds facts from the SDEO(M) Pryan; Shangla vide No.806, dated 12/05/15 against you Mr Ghuncha Din PSHT, GPS Kooch puran, it reveals that you do not take interest in your official duties. You were from time to time was directed by this office as well as by the concerned SDEO(M)/ ASDEO(M) Circle to obey the instructions on this score and change your attitude habits but you do not turned positive attention towards these instructions/ directions and carry on your willing practice. Besides, you were served Show Cause Notice, but the reply furnished by you was not satisfactory up to the satisfaction of the concerned SDEO(M) and he was not agreed with the reply furnished by you. Reportedly, an alternate/ private person was found on your place of duty and you were disappeared from your duties which is against the rules. Allegations have also been leveled against you regarding the using/ expenditure of School PTC funds.

Keeping in view of the above circumstance/ grounds facts and in the light of the contents of the report furnished by the SDEO(M) Pryan; as referred to above, And whereas the Competent Authority having considered the charge evidence on the record as per reports of the concerned SDEO(M) Pryan is of the view that the charges have been proved.

Now therefore, in exercise of powers conferred by the Khyber Pakhtunkhwa Government servants (Efficiency & discipline), Revised rules 2011, the following proposed penalties are hereby imposed upon you (MR GHUNCHDIN PSHT) with immediate effect.

- 1. Recovery of Salaries for a period of two (02) years and (15) Fifteen days i.e (745 days) w.e.f. 15/4/13 to 30/4/15 amounting to Rs.10,18,403/-.
- 2. Demotion from BPS-15 to 12.
- 3. Transfer from GPS Kooch Puran to GPS Alpuri No.2 upon disciplinary grounds and may be kept under the strict vigilance eyes of SDEO(M) / ASDEO(M).
- 4. Recovery of School PTC Funds.

(Saeed Khan)

DISTRICT EDUCATION OFFICER (M)  
DISTRICT SHANGLA.

Dated:- 26/5/2015.

Endst: No: - 1136-40

Copy forwarded for information and necessary action to:-

- 1. The District Accounts Officer Shangla.
- 2. The District Monitoring Officer Shangla.
- 3. The SDEO (M) Pryan: Shangla w/r to his memo; referred to above, for information and n/action at his end please.
- 4. The ASDEO (M) Circle Puran .
- 5. The Head Teacher Concerned.
- 6. Mr. Ghunchadin; PSHT, GPS Kooch Puran

DEPUTY DISTRICT EDUCATION OFFICER (M)  
DISTRICT SHANGLA

Asstt. Distt. Edu. Officer (Estab)  
(M) Primary, Shangla.

*change sheet*  
*Memo of Allegation*  
*order by committee*  
*ED/ committee*  
*Report of enquiry officer*  
*final show cause notice*

*[Handwritten signature]*

The Director (E&SE),  
KPK Peshawar.

① - ②  
C - ⑧

DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 26-05-2015  
WHEREBY PENALTIES OF

1. Recovery of Salaries for a period of (02) years and (15) Fifteen Days i.e. (745 days) w.e.f. 15/04/2013 amounting to Rs. 10,18,403/-.
2. Demotion from BPS -15 to 12.
3. Transfer from GPS Kooch Puran to GPS Alpuri No. 2 upon disciplinary grounds and may be kept under the strict vigilance eyes of SDEO(M)/ASDEO(M).
4. Recovery of School PTC Funds.

were imposed upon the appellant.

Respect sir.

1. That the appellant joined education department as PTC in year 1982 and performed his duty in different School with great Zeal and efficiency to the entire satisfaction of the superiors.
2. That charges sheet and statements of allegation was issued to the appellant in which the appellant was charges,
  - i. You are remained absent from duty after you posting GPS KOO (Purn)
  - ii. You committed of miss conduct and in efficiency during you service.
3. That then one sided so call inquiry was conducted against the appellant in which no chance of defense was provided to the appellant, even the enquiry report was not provided to the appellant.
4. That Final Show Cause Notice was issued to the appellant which was duly replied by the appellant in which he denied all the allegation.

Handwritten notes in Urdu script, including a signature and the date 16/6/15.

Handwritten signature and date 15/6/15.

5. That on dated 26-05-15 order was passed where in:-

- a) Recovery of Salaries for a period of two (02) years and (15) Fifteen Days i.e. (745 days) w.e.f. 15/04/2013 amounting to Rs. 10,18,403/-.
- b) Demotion from BPS -15 to 12.
- c) Transfer from GPS Kooch Puran to GPS Alpuri No. 2 upon disciplinary grounds and may be kept under the strict vigilance eyes of SDEO(M)/ASDEO(M).
- d) Recovery of School PTC Funds.

were imposed upon the appellant. (Copy of order is attached is Annexure "A")

6. That now the appellant has got no other adequate and speedy alternative remedy except to file this departmental appeal, on the following grounds.

#### GROUND S

- A) That the order dated 26-05-2015 is against the law, rules, material on record therefore not tenable or maintainable and liable to be set a side.
- B) That appellant has not provide chance of defense and has been condemned unheard.
- C) That the penalties imposed upon the appellant are very harsh and did not commensurate with the guilt of the appellant.
- D) That one of the penalty in which the appellant was demoted from BPS-15 to BPS -12 however the order did not mention the time period of the demotion which is against the FR-29.
- E) That the inquiry was not conducted according to prescribe procedure which is in violation of law and rules.
- F) That numerous penalties were imposed on the appellant which is against the norms of Justices.
- G) That the appellant has not been treated according to law and

من اندر و تکرار  
از نظر عدالت  
در این مورد  
16/5/15

15/5/15  
ATTACHED

(12)

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It is, therefore, most humbly prayed that the departmental appeal may please be accepted by setting aside the impugned order Dated 26-05-2015, any other remedy which deems fit and proper in the interest of justice may also be awarded in favour of the appellant.

Date: 09/06/2015

Appellant  
*Ghuncha Din*  
Ghuncha Din  
Village Sundovi Puran Distrct Shangla  
0334-8369682  
0996-853457

*Handwritten signature*

ATTESTED

حرف

Handwritten notes and signatures at the bottom of the page, including the date 16/6/15 and a signature with initials A.A.

D - 11

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Ghunchadin S/O Abdul Karim PSHT, GPS Kooch Puran, District Shangla  
.....Appellant

VS

1. Executive District Officer Male District Shangla at Alpuri
2. Director education at Civil Secretariat Peshawar
3. Government of KPK Secretary Education at Civil Secretariat Peshawar.


.....Respondents

**APPEAL U/S 4 SERVICE TRIBUNAL ACT 1974**  
**AGAINST THE IMPUGNED ORDER PASSED BY**  
**RESPONDENT NO. 1 DATED 26/05/2015**  
**WHEREBY THE APPELLANT HAS BEEN**  
**IMPOSED THE PANELTIES: -**

- 1. RECOVERY OF SALARIES FOR A PERIOD OF TWO (02) YEARS AND (15) FIFTEEN DAYS I.E. (745 DAYS) W.E.F. 15/04/13 TO 30/04/15 AMOUNTING TO Rs. 10,18,403/-**
- 2. DEMOTION FROM BPS-15 TO 12**
- 3. TRANSFER FROM GPS KOOCH PURAN TO GPS ALPURI NO. 2 UPON DISCIPLINARY GROUNDS AND MAY BE KEPT UNDER THE STRICT VIGILANCE EYES OF SDEO(M) / ASDEO(M).**
- 4. RECOVERY OF SCHOOL PTC FUNDS.**

**PRAYERS:**

**ON ACCEPTANCE OF THIS APPEAL THE IMPUGNED ORDER PASSED BY RESPONDENT NO.1 DATED 26/05/2015 BE SET ASIDE BEING ILLEGAL, UNWARRANTED AND VIOLATIVE OF RULES AND LAW AND PRINCIPLES OF NATURAL JUSTICE**

  
**APPEAL**

(12)

**RESULTANTLY THE INQUIRY ENSUIDE AGAINST THE APPELLANT BE FILED WITHOUT ANY FURTHER PROCEEDINGS.**

**ANY OTHER RELIEF DEEMED FIT IN CIRCUMSTANCES OF THE CASE NOT SPECIFICALLY PRAYED FOR MAY ALSO BE GRANTED IN FAVOUR OF APPELLANT AGAIST RESPONDENTS.**

**Respectfully Sheweith;**

The appellant submits as under:-

1. That the appellant has joined the education department in the year 1982 as a teacher and since then the appellant is serving as civil servant to the best of ability, efficiency and keen interest while discharging the official functions.
2. That during this long period rounding about 33 years, there was no complaint against the appellant from any corner or by high ups of the appellant had also not pointed out any sort of grievances from the appellant being a civil servant.
3. That all of a sudden respondent No.1 in utter disregard of law and facts ensued an inquiry against the appellant whereby the appellant has been charge sheeted and it was on 26/05/2015 that the impugned order was passed against appellant imposing three kinds of penalties as detailed in the impugned order. (Attested copy of the impugned order is attached herewith as annexure "A")
4. That the appellant being dissatisfied from the impugned order passed by respondent No.1 opted to file a departmental appeal as required under the relevant provision of law before respondent No.2. (copy of the memo of appeal before respondent No.2 attached herewith as annexure "B")
5. That the respondent No.2 has not responded the appeal filed by the appellant and hence the appellant being aggrieved from the impugned order passed by respondent No.1 is constrained to file the instant appeal inter alia on the following grounds among others.

**Grounds:**

- i. That the impugned order passed by respondent No.1 dated 26/05/2015 is


ATTACHED

against law, facts and material available on record and hence liable to be set aside.

- ii. That the entire proceeding conducted against the appellant has been made in deviation from law and rules and annulling the principles of natural justice.
- iii. That the procedure conducted by respondent No.1 against appellant is alien to law, rules and principles of natural justice because no opportunity of being heard has been provided / afforded to the appellant for making appropriate defense in response to the allegation leveled by respondent No.1 against appellant. Thus the impugned order is devoid of all legal force.
- iv. That the period in which it has been ordered to recover the amount of salary from the appellant the attendance mark sheet from register is available which is the conclusive proof that the appellant has attended the school and discharged his function and duty according to law and rules.
- v. That there was no tangible evidence confronted with the appellant which could prove the charge leveled against the appellant.
- vi. That the impugned order / judgment is the result of misreading and non reading of materials available on record.
- vii. That the impugned order / judgment is based on assumptions and presumptions, conjectures and surmises having no nexus with the facts and record.
- viii. That the procedure has been adopted in derogation of law and rules and there are serious dents in the impugned order / judgment rendering the same as illegal, unwarranted and hence of no legal consequence.



- ix. That the salary of the appellant has also been stopped and this fact has not been incorporated in the impugned order therefore, the impugned order is patently illegal on account of so many grounds.
- x. That in case if for the sake of arguments, the respondent No.1 consider the impugned order as correct one then how the department remained indolent for couple of years which also shows laxity on their part if the alleged allegation are presumed as correct (Which is not otherwise admitted so).
- xi. That the enquiry has been conducted by an officer who was not legally competent to do so, moreover, there are so many serious dents in the enquiry which would not support or sustained the impugned order.
- xii. That the monitoring team on various occasions had visited the school wherein the appellant was deputed and has collected the relevant record which would be in their possession, in case if there was some wrong comitted by the appellant, the monitoring team would have taken appropriate against the appellant but as all the affairs were just according to law and rule therefore, the appellant remained unheart even by monitoring inspection team.
- xiii. That the impugned office order is tainted with mala-fide on the part of respondent No.1 and thus the entire proceeding are liable to be set at naught and furthermore, the appellant is in position of solid documentary evidence which would shake the sustainability of the impugned office order. (Copy of which are attached herewith the appeal along with all record regarding improvement made, certificate issued at etc.)
- xiv. That any other grounds not specifically raised shall be argued at the time of arguments with the leave of the court.

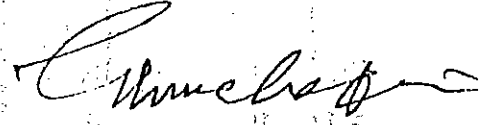
  
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(15)

It is therefore, humbly prayed that on acceptance of this appeal the impugned order / judgment dated 26/05/2015 be set aside and the inquiry conducted against the appellant be declared as illegal, unwarranted and hence of no legal consequences.

Appellant

Ghunchadin



Through Muhammad Saeed Khan  
Shangla

Advocate Supreme Court of  
Pakistan

Office C-6, Azeem Khan Plaza,  
Makan Bagh, Mingora, Swat.

Cell No. 0345-9429063

0316-5536261

0332-9186261

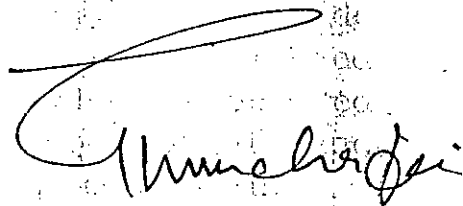
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**Verification:**

It is hereby verified that the contents of this appeal are correct and true to the best of my knowledge and belief and nothing has been kept concealed from this honorable service tribunal.

Appellant

Ghunchadin



  
ATTENDED

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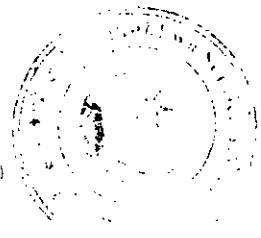
E-16

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
CAMP COURT SWAT.

Service Appeal No 1090/2015

Date of Institution... 28.07.2015

Date of decision... 31.1.2018



Ghurcha Din son of Abdul Karim PSHF, GPS Kooch Puran, District Shangla  
... (Appellant)

Versus

1. Executive District Officer (Male) District Shangla at Alpuri and two others.  
... (Respondents)

MR. NOOR MUHAMMAD KHATTAK.  
Advocate ... For appellant.

MR. MUHAMMAD JAN,  
Deputy District Attorney ... For respondents.

MR. NIAZ MUHAMMAD KHAN, ... CHAIRMAN  
MR. GHUL ZEB KHAN, ... MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: - Arguments of the learned  
counsel for the parties heard and record perused.

FACTS

2. The appellant was awarded four penalties on 26.5.2015 which included  
recovery of salary, demotion, transfer and recovery of school BTC Funds. Against  
this order, the appellant filed a departmental appeal on 09.6.2015 which was not  
responded to and thereafter, the appellant filed the present service appeal on  
28.07.2015.

ATTESTED  
  
Ghurcha Din  
Appellant

ATTESTED  
Ghul Zeb Khan  
Member

ARGUMENTS

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3. The learned counsel for the appellant argued that there are discrepancies in the charge sheet, statement of allegations and show cause notice. That all the three do not match with each other. He also argued that no copy of enquiry report was given to the appellant. That the enquiry was not conducted in accordance with law. That no opportunity of cross examination was afforded and no right of defence was given to the appellant. That the demotion could not be more than one pay scale and the appellant had been demoted by two pay scales.

4. On the other hand, the learned District Attorney argued that proper enquiry was conducted. That charge sheet and statement of allegations were issued to the appellant but after the receipt of the enquiry report, the authority dispensed with the enquiry on the ground that sufficient material was available with the authority.

CONCLUSION

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5. The statement of allegations, charge sheet and the show cause notice when kept in juxtaposition would reveal that there are material discrepancies in all the three regarding the charges levelled against the appellant. The penalties awarded to the appellant are not in accordance with the law as one of the penalties is transfer which is not included in the penalties under the relevant rules. In this regard there are so many judgments of the Superior Courts in which it has been held that the transfer cannot be made on the basis of disciplinary proceedings. Reliance is placed on 2012-PLC(C.S.) 187. Leaving aside this aspect of the case a grave illegality has been committed by the authority by first appointing the enquiry officer after issuance of charge sheet and statement of allegations and then after receipt of formal enquiry report, he had dispensed with the enquiry. It is not understandable that how after issuing of charge sheet and statement of allegations and findings of enquiry officer, the enquiry can be dispensed with. This amounts to a paradox.

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which is irreconcilable. The show cause notice issued after the receipt of the enquiry report does not mention the findings of the enquiry officer nor the copy of the same has been supplied to the appellant. In order to evade the responsibility of supplying copy of the enquiry report to the appellant and affording opportunity of personal hearing, the authority adopted a novel course of dispensing with the enquiry. It is also not understandable that how the authority came to the conclusion that sufficient material was available against the appellant, if the enquiry was not considered. The whole proceedings are illegal.

6. As a sequel to the above discussion, the present appeal is accepted, the penalties so awarded to the appellant are set aside. The department is however, at liberty to hold denovo proceedings within a period of ninety days from the date of receipt of this judgment. Parties are left to bear their own costs. File be consigned to the record room.

SD/- Niaz Muhammad Khan,  
Chairman  
appellate court

ANNOUNCED  
31.1.2018

SD/- Gul Zeb Khan,  
Member

Certified to be true copy  
Khyber Pakhtunkhwa  
Services Tribunal  
Peshawar

Date  
Number  
Case  
Page  
Page  
Page  
Page

07-02-2018  
1200  
8.00  
8.00  
08-02-2018  
08-02-2018

ATTESTED

OFFICE OF THE ENQUIRY COMMITTEE PRINCIPALS GCMHS ALPURAI & GHS SHESHAN  
LILOWNAI DISTRICT SHANGLA

No. 1568  
To

Dated: 03/05 2018



F-19

The District Education Officer (M)  
District Shangla.

Subject: **DE NOVO ENQUIRY AGAINST MR. GHUNCHA DIN PST GPS CHAGAM NO:2 (AS PER COURT DECISION).**

**Introduction of inquiry:** In pursuance of the District Education Officer (M) Order No. 4336-37 dated: 03/03/2018 The undersigned namely Sultan Sikandar Headmaster GHS Sheshan and Mirza Ali Headmaster GCMHS Alpurai appointed as enquiry committee for the captioned above inquiry.

**PROCEDURE OF INQUIRY :-** The committee summoned the accused Government Servant on 12/04/2018 and all the concerned inquiry Officers, parents teachers council office bearer, complainants and necessary parties as witnesses to filter the grain from chaff. Due to denova inquiry the competent authority issued fresh charge sheet and statement of allegation for the end of justice.

Therefore, we the inquiry committee fulfilled all the requirements and acted the inquiry judicially, fairly, impartially because we are duty bound to make a judicious consideration of facts of the case to arrive at correct conclusion and not to infringe upon the rights of any one. We applied two minds to each and every matter independently and according to the spirit of law. Proceedings having been taken according to the Govt servants rules. We completed the inquiry in such manner as we think best fitted to do substantial justice. Elementary right of defense accorded them detail thereof is as under.

**CROSS EXAMINATION AND PROVISION OF ALL AVAILABLE DOCUMENTS:-** The opportunity of cross examination was afforded to the accused Govt: Servant. The written statement also recorded of all the summoned witnesses. All the relevant documents were provided. Reply to the charge sheet & statement of allegation also furnished by the accused along with his supporting documents.

**History sheet of the accused Govt Servant:**

01. Complaint of village Baker against Ghuncha Din PTC Vide No. 174 dated: 12/04/1994. Annexure A. placed on page no 1 of the accused personal file.
02. Complaint filed by the inhabitants of GPS Atesh Kotkay against the accused Govt servant placed on page no 22 and on page 42 as annexure B.
03. Report of Sultan Room Learning coordinator (LC) on 16/09/2000 against absenteeism of Ghuncha Din PST GPS Atesh Kotkay placed on page no 15 of P.F. The inquiry committee Abdu Tawab ADO endorsed on Page. 26. Resultantly Converted in EOL by District Education Officer Swat Vide No.4832 dated 10/10/2000 and also stopped the pay

*DAI  
Put up with it  
8/10/18*

*[Handwritten signature]*

*[Handwritten signature]*

*[Handwritten signature]*

*ADP-180  
Sub of  
4/5/18*

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although stoppage of pay does not exist in the disciplinary rules in vogue. aforementioned documents are Annexure C to E.

04. Mr. Ghuncha Din filed complaint against Zainul Haq PTC GPS Atesh Kotkay regarding embezzlement on 18/07/2000 & irregularities placed on page 38, 39. As Annexure F.
05. DEO (M) Swat initiated inquiry against Ghuncha Din PST GPS Atesh Kotkay as absence from duty vide No. 573-76 dated 31/01/2001. Placed on Page No.37 as annexure G.
06. The inquire conducted by three ASDEOs vide no 2514-16 dated 14-06-2001 on the complaint of accused Govt servant against Zainul Haq PTC GPS Atesh Kotkay wherein reported that Ghunch Din is absent w.e.f 9/3/2000 to 23/02/2001 i.e inquiry report placed on page 53 to 59 annexure H.
07. The District Officer Education Swat converted his absence period 1/9/2000 to 23/12/2000 (114) days, 24/12/2000 to 28/02/2001 (67) days and 1/3/2001 to 6/3/2001 (6) days as earned leave on full pay. placed on page 66 annexure as I.
08. Statement of allegation & charge sheet issue vide 6773 dated 09/11/2013 on the complaint against the accused Govt servant placed on Page No. 118 ,121,122 annexure J.
09. Mr. Akbar Ali SST GHSS Sandovi/inquiry officer categorically reported that Mr. Ghuncha Din hired a substitute teachers w.e.f April 2013 till date of inquiry i.e 30/11/2013 in lieu of Rs. 7000/ placed on Page No. 128 as annexure K.
10. Show Cause on Page 129 regarding inefficiency, Guilt of corruption guilt of habitual absence vide No. 442-44 dated 24/01/2014 issued by District Education Officer(M) Shangla as annexure L
11. Chairman PTC Mr Absu Zahir showed his satisfaction from the duty of the accused Govt servant placed on page 136 and 138 as annexure M.
12. Dost Muhammad PST & Nazir Muhammad Chowkidar also endorsed absence from duty & substitutes hired by the accused Govt servant placed on page. 155 as annexure N.
13. Report of SDEO placed on Page 156,157 and 158 revealed that Mr:Ghuncha Din considered deptt: his subordinate so ill behavior. Further recommended recovery, ii down grading iii. Embezzlement as annexure O.
14. DEO Shangle imposed the impugned penalty vide 1136-40 dated 26/05/2015 after show cause notice Placed on page 161 as annexure P.
15. Mr. Abdul Haleem ADO visited the school and partially satisfied from the accused placed on page 167 to 169 as annexure Q.
16. ASDEO Circle marked the accused absent on 10/12/2015 according to logbook placed on Page No. 172 and SDEO(M) called Explanation on Page 173 as annexure R.
17. ASDEO Circle Alpurai on 15/12/2015 reported that Ghuncha Din found 3 days absent placed on Page 175 and warring issued by SDEO vide No. 1441 dated: 23/01/2016 placed on page 176 as annexure S.

**CURRENT PROCEEDING:**

The inquiry committee followed the procedure laid down by service rules all the concerned officials / complainants were summoned on 19/04/2018 to attend inquiry committee on 24/04/2018. Daily proceedings were decided. Copy attached as annexure V.

13/4/13

ATTESTED

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21

Mr. Ghuncha Din summoned for 12/04/2018 when he attended the inquiry committee the accused reported that he has not received charge sheet & statement of allegation & school record so far. He requested for adjournment so adjourned up to 19/04/2018.

On 19/04/2018 the accused and Mr. Fazal Subhan PST GPS Koo alongwith school record attended, Mr. Fazal Subhan PST recorded his statement and the accused examined him crossly but to the non availability of complete record as raised by the accused we summoned Mr. Abdus Zahir PSHT as laid down under CPC. The accused again requested for adjustment to furnish reply to the charge sheet. We accepted his plea and date adjourned upto 20/04/2018.

On 20/04/2018 contacted on phone that the accused could not attend inquiry committee and date adjourned till 21/04/2018. On 21/04/2018 we the inquiry committee contacted him to ensure his attendance on 24/04/2018 to cross examine all concerned.

On 24/04/2018 the accused and Ex: SDEO (M) Mr. Aurang Zeb, Mr. Zoor Muhammad, Ex: ASDEO Circle Alpurai, Abdul Baqi PSHT Alpurai No.2, Abdu Zahir PSHT GPS Koo, Dost Muhammad Khan PST GPS Koo, Abdul Shakir (name Sake) Chairman parent teachers council attended the inquiry committee and the remaining summoned officials remained absent from the proceedings.

On 24-4-2018 we recorded the statements of the above officials/relevant persons, the accused government servant cross examined. Attached as annexure T.

The accused again requested for furnishing reply by tomorrow so he furnished reply on 25-04-2018.

We examined all the documentary proof, statements of the witnesses' evidences recorded and cross examination of the accused and his reply to charge sheet and statement of allegations. We fully followed the rules which reproduces as below from the establishment code.

"Inquiry Officer/ Committee. To ensure that:-

- (1) The procedure laid down in Rule 6(1) to 6(5) is strictly adhered to during the inquiry proceedings.
- (2) The inquiry proceedings being of judicial nature in terms of rule 7, the Inquiry Officer has recorded the statement of witnesses on oath. [Rule 7(a)].
- (3) The accused officer is allowed to cross-examine the witnesses produced against him during the proceedings [Rule 6(2)].
- (4) The accused officer is afforded reasonable opportunity to produce his defence [Rule 6(1)(b)].
- (5) The case is heard from day to day and no adjournment is given except for reasons to be recorded in writing which should be reported to the authorised officer. No adjournment should exceed a week [Rule 6(3)].
- (6) The findings are recorded after due analysis and appreciation of evidence on record.

(Authority:-S&GAD's letter No.SORII(S&GAD)3(4)/78,dated 13.8.1985)  
D.O letter It has generally been observed that in dealing with disciplinary cases against Government Servants due care is not taken to observe the provisions of Government Servants (E&D) Rules, 1973 and instructions issued thereunder. Certain legal and procedural irregularities and infirmities have come to the notice of the Federal Government particularly with regard to framing and issuance of Charge Sheet alongwith statement of allegations, appointment of Inquiry Officer/Inquiry Committee and conduct of inquiry proceedings and undue delay in the finalization of disciplinary proceedings etc. certain omissions are grave in

Stamp: S&GAD



(4)

22

nature and failure to comply with the requirement of Government Servants (E&D) Rules, 1973 can vitiate the proceedings conducted against the accused officer. It is therefore, necessary that extreme care should be taken by the Authorized Officers, Inquiry Officers and the Authorities to ensure that disciplinary cases are dealt with according to prescribed rules and procedure.

**Outcome of the inquiry:** According to the dictate of our conscience and justification approach we are in the following fair and firm opinion."

The history of the accused shoed his willful absence, negligence, ill behavior with top, bottom & horizontal officials, his inefficiency and hiring substitute teachers. All the inquiry officers reported against the accused Govt servant as mentioned in history sheet.

The lacuna of the department also observed as follow that since long his inefficiency, absence from duty, alternate teacher hiring reported but despite all the department promoted the accused Govt teacher to PSHT in 2013 while seniority cum fitness,ACRs are the pre-requisite for promotion, resultantly exonerated him from all charges till 3013.

Similarly no punishment was accorded in case of absence & the lenient plea adopted by the department as conversion of absence period in leave with full pay as mentioned in history sheet.

Transfer has made as a punishment which is not punishment under the rules.

The department also failed to complete the course of inquiry in stipulated period which goes in favor of the accused as laid down in establishment code KP & E&D rules. The relevant portion of the establishment code is reproduced as below.

"Speedy disposal of Disciplinary Cases". I am directed to say that instructions for expeditious finalization of departmental inquiries against Government servants have not produced the desired results. It has been observed that inquiries against Government servants are dragging on for long periods. In some cases the slow progress of the inquiry proceedings provide an opportunity to the accused officials to win over the witnesses and consequently escape the clutches of law. In other, the protracted inquiries cause financial hardships, unnecessary mental anguish, frustration and demoralization of the accused officials in general and those whose promotions are due in particular. Inordinate delays in the dispensation of justice not only defeats its very purpose but also impairs public interest by causing financial loss to Government by way of payment of salaries and allowances to the officials concerned. One of the reasons for such delays is that no check is being maintained on the progress of such cases by the Departments concerned.

Considering the nature of charges and other facts, the decision not to hold an inquiry has been taken judiciously and not arbitrarily. Before taking such a decision, the authorised officer has taken into consideration the nature of charges and other facts and has satisfied himself that the allegations against the accused could be decided without holding an enquiry [Rule 5(3)]. (Though it is not a requirement of the rule that the reasons for not holding an enquiry be recorded, yet the check-point is necessary to ensure that the decision is in the interest of justice as required by rule and that there is no violation of the law of natural justice)."

The department is duly bound to follow the rules & regulations and all branches and inquiry officers must be equipped with these rules and regulation as well as procedure of the inquiries.

**Conclusion and findings:**

- 01. The accused teacher has found negligent in his duty time and again.



APR 2013

5

2/3

- 02. For the period 15/04/2013 to 23/04/2015 (2 years and 8 days) alternate teachers have performed school duty in place of Ghuncha Din accused and payment made by Ghunch Din out of his salary.
- 03. School PTC physical works record, vouchers and record is also incomplete up till now.
- 04. The accused teacher has also ill behavior, which is against the service rules.
- 05. It is also fact that proper departmental procedure has not been adopted against the accused teacher despite mentioning his gross irregularities which was the responsibility of the PSHT,ASDEO and SDEO and establishment branch of the DEO (M).

✓

06. Recommendation:

- 1. The absent period/alternate period i.e 15/04/2013 to 23/04/2015 two years and eight days may be converted in leave without pay .
- 2. The irregularities in parent's teacher's council physical works found as per report of ASDEO Abdul Haleem but the remaining works have been properly completed so recovery of Rs 28000 may be made from the accused and be deposited in the PTC account.
- 3. The ASDEO circle in 2013 may be issued explanation and also warning to all branches to maintain sheet as prescribed in the esta code for such like cases as usually the inquiry officers accusing only the accused govt servant and conceal the irregularities of the department which is partiality. His demotion is untenable.
- 4. The ASDEO circle may be directed to furnish his monthly performance report in future to ensure his efficiency till his retirement.
- 5. The allegations leveled by accused against P&D needs enquiry.

Enclosure: Inquiry file containing 70 pages

It is requested that copy of the inquiry report in question may be provided to the accused and all relevant documents if he required so.

It is requested that copy of the inquiry report in question may be provided to the accused and all relevant documents if he required so.

Sultan Sikandar  
Headmaster GHS Sheshan

Mirza Ali Headmaster  
GCMHS Alpurai

ATTESTED

2-1/9/1013

# لاگ بک (صفحہ دوم)

رپورٹ کی روشنی میں سکول  
انتھارٹی نے جو کارروائی کی۔

رائے / رپورٹ معائنہ

I Amang Zaf. ADO (P&D)  
Maali Shyfa. visited the  
School & PS Kor Baur  
Puram Shyfa on 23/5/14.

Amang Zaf  
ADO (P&D)  
Maali Shyfa  
23/5/14

All the staff and chaulandis  
were present on occasions  
and busy in their work.

The purpose of my visit  
was final inspection of  
constructed additional Room  
in ADP. The Room was  
completed in all respect  
only Energy Saver (ES)  
were not installed in  
the holder. The compressor  
was attached to provide  
Energy Saver to the PS  
of the School.

The Secondary aim of  
the visit was to check the  
Baur facility with provided  
by the Edu Dept. Shyfa.

APR 2014

رپورٹ کی رودستی میں سکول  
انتھارٹی نے جو کارروائی کی

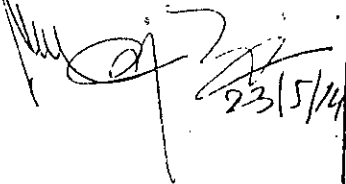
رائے / رپورٹ معائنہ

from DFID funds.  
The PSHT is hereby directed  
to start the work on  
A/wall and Electrification  
immediately and complete  
the same up to June 2014.  
Attendance of the school was  
as under:

5th	4th	3rd	2nd	1st	Nov.
$\frac{16}{16}$	$\frac{18}{27}$	$\frac{25}{30}$	$\frac{21}{22}$	$\frac{23}{27}$	$\frac{25}{30}$

The PSHT is hereby directed  
to make inventory of electrical  
fixtures installed in S/ Register  
and told the caretaker  
for its safety.

The PSHT is also directed to  
submit 03 copies of this inspection  
Remarks to the office of DEO  
Bhage within 03 days.

  
23/5/14

Copy to

- 1) The DEO SB (M), Bhage
- 2) The ADO P.D Bhage

(31)

(26)

office copy

گورنمنٹ پرائمری سکول کوہ  
 اگست 2014ء کو جمع کی تاریخ پر  
 سرکل پورن  
 سنٹر نمبر 57  
 ایف نمبر 88 این اے نمبر 31  
 EMIS 35882 کوڈ نمبر = 21940 نام یونین کونسل برہ لوڑی ہیڈ ٹیچر موبائل نمبر 8369682-0334

نمبر شمار	نام مدرسہ مدرسہ	ولدیت	سکونت	گریڈ	موجودہ گریڈ پہلے کا تاریخ	تاریخ پیدائش	تاریخ آغاز ملازمت	تاریخ تقریری بعد از ٹریننگ	موجودہ سکول میں پانچ لئے کے تاریخ	سکول پڑائش کوئی سکول سے تبادلہ ہوا	CNIC No	پوسٹ نمبر	قلمی اکاؤنٹ نمبر	بیک بیلنگ کام نمبر	GPF No	ریٹائرڈ ہونے کی تاریخ	تعداد پڑھانے والے بچے			
																	نارٹھ	سولہ	سولہ	سولہ
1	پنجاب پرائمری سکول P.S.H.T	منڈی	کوہ	15	13.3.13	13.4.61	18.8.82	18.8.88	18.4.13	77	3507019-3	3507019	3423	17218	8338	2021	1	20	02	18
2	گورنمنٹ پرائمری سکول F.A	کوہ	کوہ	12	13.3.13	18.1.51	18.4.09	18.4.09	18.6.13	سرتے	1505051-5	470884	4544	11	-	2035	2	25	02	23
3																				
4	چھوٹی چھوٹی سکول chow	کوہ	کوہ	02	14.04	14.10.96	14.10.96	14.10.96	15.10.96	تقریری	1515051-1	40348	70809	11	-	2025	3	15	05	10
5																				
6																				
7																				
8																				
9																				
10																				
11																				
12																				

Gluncha Din  
 Head Teacher  
 P.S.H.T  
 Puran Shingla  
 سرکل  
 20/07/2014

نمبر شمار	نام پوسٹ	منظور شدہ آسامیاں	قلمی
1	پی ایس ٹی	02	
2	چیک دیا	01	
3	دیگر		

عمارت مدرسہ  
 1992-93  
 03  
 96  
 296-2

احمد علی ابدایت الرحمن

بنیادی سہولیات  
 گورنمنٹ پرائمری سکول کوہ  
 10710941

~~27~~ 12 ~~27~~ (27)

NO \_\_\_\_\_ Dated 15-4-2013.

Charge Report

It is hereby certified that Mr. Ghurchadin Pst has transferred from

G.P.S. Dard vide order No. 1756-62 Dated 13/4/2013 D.D.(M)

F&S Education Shajapur to G.P.S. Kad. He took over charge today on 15/4/2013

Forenoon in G.P.S.

Charge Report should be submitted to all concerned

*copy for information*  
D.E.D. M/F Distt Shajapur

Head Teacher

*Punchcard*

S.D.E.D (M)  
o/c

*copy to  
2013 Distt*

G.P.S. Kad Shajapur  
Road Teacher  
Govt. Primary School  
Bee puran Distt. Shajapur

15-04-2013

*[Signature]*

Sent To: \_\_\_\_\_

# OUT DOOR PATIENT TICKET

28

District Shangla CRP No: \_\_\_\_\_  
 Facility Name \_\_\_\_\_  
 Name Engr. S. Q. Q. S. Q. P.H.O. Alpuzi  
 Age: 50/00 Sex: M  
 Father's/Husband's Name \_\_\_\_\_

Monthly OPD Serial No. \_\_\_\_\_  
 Provisional Diagnosis: RTA

Date

10/6/15

Clinical Findings / Investigations / Treatment / Referred / Test Findings

Fracture patella -  
(R)

① Yes Neoprox 20  
14/5502

② Yes Intig 0.7  
with anal

③ Advised bed rest & treatment for 30 days.

Medical Officer,  
 O.H.O Hospital Alpuzi,  
 Distt: Shangla.

ATTACHED



# Swat Medical Complex

Faizabad Road, Saidu Sharif, Swat.  
E-mail: smcswat@brain.net.pk

29

Phone 0946-710281  
0946-710282  
0946-710283  
0946-729315  
Fax 0946-712193

Dr. Mohammad Iqbal

M.B.B.S. (Pesh)  
M.S. (Orthopaedics)  
F.A. O (Germany)

Associate Professor Orthopaedics, Visiting Orthopaedic Surgeon & Traumatologist  
Swat Medical Complex, Saidu Sharif Swat.

آرٹھو پیڈک سرجن

ڈاکٹر محمد اقبال

ایم۔ بی۔ بی۔ ایس۔ ایم۔ ایس۔

ماہر امراض ہڈی، جوڑ

Mr. Ghuncha Din

Date 28 JUL 2015

55

6 1/2 old. Rx. Patella.

Rx. (non union)

Ext. mechanism

intact.

Surgery explained

to pt.

of

copy

ATTACHED

دوبارہ معائنہ کیلئے \_\_\_\_\_ دن بعد تشریف لائیں۔





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36

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M.B.B.S. (Pesh)  
M.S. (Orthopaedics)  
F.A. O (Germany)

Associate Professor Orthopaedics, Visiting Orthopaedic Surgeon & Traumatologist  
Swat Medical Complex, Saidu Sharif Swat.

آرٹھوپیدک سرجن

ڈاکٹر محمد اقبال

ایم۔ بی۔ بی۔ ایس۔ ایم۔ ایس۔


یہاں امراض ہڈی، جوڑ

Mr. Ghuncha Din.

Date 11 JUN 2015

X-Ray ~~RT~~ ~~KA~~ both knee  
sky line view

Not union.  
FX. Patella. /  
RT.  
o/c. wounds  
day 1.  
Can extend  
knee joint  
pain of.  
x-Ray - /  
not union /  
Surgery /  
vs. Cont. /  
(as Feb mech.  
in hand)

  
ATTESTED

LOBU

دوبارہ معائنہ کیلئے \_\_\_\_\_ دن بعد تشریف لائیں۔



# Swat Medical Complex

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Associate Professor Orthopaedics, Visiting Orthopaedic Surgeon & Traumatologist  
Swat Medical Complex, Saidu Sharif Swat.

آرٹھوپڈک سرجن

ڈاکٹر محمد اقبال

ایم۔ بی۔ بی۔ ایس۔ ایم۔ ایس۔  
ماہر امراض ہڈی، جوڑ

Apr. Ghumcha Pen.

Date 29 APR 2015

55

o x-ray Rt. Knee L. Lal  
(Roa. union) Fr. Patella

2

o Normal saline wash.

o Ray band dressing pads

o Tab. Ecasil 600mg.

o 10 x 10 cm IT

o 100 open Fr.  
(Comm.) Patella  
(R)  
1/2 still open.  
Wound

loba

ATTENDED

دوبارہ معائنہ کیلئے \_\_\_\_\_ دن بعد تشریف لائیں۔



# Swat Medical Complex

32

Faizabad Road, Saidu Sharif, Swat. Ph: 0946-710281-3, Fax: 0946-712193  
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Dr. Mohammad Iqbal

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F.A. O (Germany)

Associate Professor Orthopaedics, Visiting Orthopaedic Surgeon & Traumatologist  
Swat Medical Complex, Saidu Sharif Swat.

آرٹھوپڈک سرجن

ڈاکٹر محمد اقبال

ایم۔ بی۔ بی۔ ایس۔ ایم۔ ایس۔ ایم۔ ایس۔  
ماہر امراض ہڈی، جوڑ

Mr. Ghumcha Din

Date 12 FEB 2015

o. X-Ray Rt Knee  $\begin{matrix} AP \\ Lat. \end{matrix}$

open comm. fx. Patella.

P

o. 1/2 Caumle No. 20 (1)

o. 2-2-Sum 2gm (14)  
(14) 1/2 after TCB Dose

o. Tab. Acabed. 8mg  
1st 2nd 3rd 4th

o. Normal Saline Wash.

o. Rayband dressing pads

long

o. RSA /

Co. Pan. Rt  
Knee /

stitched at  
Puram Hospital.

o. X-Ray  
comm. fx. Patella  
Rt

X-Ray Rt (1)  
Finger

o. Clinj fx. Radial  
Aspect. Pr. Pt. (1)  
Finger

Adv. Surgery /  
after wound  
Healing

دن بعد تشریف لائیں۔

دوبارہ معائنہ کیلئے

Orthopaedic Surgeon

Dr. Sikandar Hayat

M.B.S., F.C.P.S. (Orthopaedics)  
Fellowship Ilizarov (Turkey)  
Fellowship Ilizarov (Italy)



Assistant Professor Orthopaedics

Khyber Medical College,  
Khyber Teaching Hospital  
Peshawar.

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24/2/15

Chincha Din Srye

Comm. fx @ patella  
→ open — 12 days w/d

wound on Ant-Med aspect

@ the joint

need debridement of the  
wound,

followed by fixation once the  
wound heals.

Agent Orthopaedic unit KTH  
on call through A+E

Pl. put him in cast

چھٹی بروز ہفتہ اتوار

کلینک: کمرہ نمبر A-10 آہاسین ہسپتال ڈگری گارڈن پشاور فون: 0311-9000485, 0336-9250391

آرٹھو پیڈک سرجن  
ڈاکٹر سکندر حیات

34

Dr. Sikandar Hayat

MBBS FRCGS (Orthopedic)  
Ilizarov Fellowship (Italy & Turkey)  
Paediatric Orthopedic Fellowship (Hong Kong)  
Paediatric Orthopedic & Ilizarov Surgeon.



Assistant Professor Orthopaedics  
Khyber Medical College,  
Khyber Teaching Hospital  
Peshawar.

8/6/2013

Gruncha Sin 5274

Open # (N) patella 4/12 PD

now wound healed

ME

Ext mechanism not intact

AT

CBC

ESR - 40 mm

WBC 12,000  
Hb 12  
Hct 38

TC 7200

N = 70%

L = 22%

AT Surpy

AT

ATTACHED

آرٹھوپیدک سرجن

ڈاکٹر سکندر حیات ماہر امراض ہڈی جوڑ پٹھہ، بچوں کے پیدائشی نقص ہڈی جوڑ

پگھٹی بروز ہفتے - انوار

کلینک: کمرہ نمبر A-10 آہاسین ہسپتال ڈگری گارڈن پشاور فون: 0311-9000485, 0336-9250391



35

# ABASEEN LAB

ABASEEN HOSPITAL,  
DABGARI GARDEN, PESHAWAR

Consultant Pathologist  
**Dr. Rashid Khan**  
M.B.B.S., D.C.P.

Page 1 of 1

Patient Number: 5208  
Patient Name: GHUNCHA DIN  
Son/Daughter/Wife:  
Referred By: DR.SIKANDAR HAYAT

Receiving Date: 08-Jun-2015  
Time: 06:32:54PM  
Delivered On: 08-06-2015  
Time: 07:48:28PM

Parameter	Result	UNIT	Normal
-----------	--------	------	--------

## RESULT

### BLOOD CP

HB	11.2	G/dl	(F) 12 --- 16 (M) 14 --- 18
TLC (WBC)	7,200	/cmm	4000 -- 11000
<b>Differential: Lecocvtes Count</b>			
Neutrophils	70	%	40 --- 70
Lymphocyt	22	%	20 --- 40
Eosinophil	05	%	01 --- 06
Monocytes	03	%	02 --- 10
Platelet Count	3,18,000	/cmm	150000 --- 400000

### E.S.R

E.S.R 80 mm/1st hrs M=15,F=20

ATTACHED

Mr. Lalzada

D.M.L.T. (C Path) Med. Faculty (KPK)  
B.Sc. (Hons) M.L.T. (KMU)  
Medical Technologist (K.C.D)

# Shaukat Khanum Memorial Cancer Hospital & Research Centre

Johar Town, Lahore, Pakistan. Phone: +92-42-35905000, 111-155-555, Fax: 042-35945198  
Email: info@skm.org.pk, Website: www.shaukatkhanum.org.pk



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## Department of Pathology

VIEW: 03-Mar-2015 20:07:03

## Microbiology Report

Page 1 of 1

Dept Ref# : MIC-15-024119  
MRNO : C49-C4915002003  
Name : GHUNCHADIN  
Age/Sex : 52 Year(s)/Male  
Phone : 92 0331 9192825

Ordered By :  
In-house Consultant :  
Report Destination : Collection Centre - 49  
Requested : 28-FEB-2015 18:01:00  
Specimen Received : 01-MAR-2015 08:36:46  
Reported : 03-MAR-2015 15:24:44

SPECIMEN: PUS (Syringe)  
TEST: Culture and Sensitivity

SMEAR REPORT: WBC 10-20  
No definite organism seen

CULTURE REPORT: No growth after 48 hours Incubation.

  
**ATTESTED**

Shahzera Mukhtar  
Sr. Medical Technologist

Electronically verified report, no signature(s) required.

Dr. Asif Loya  
MBBS, DABP (AP and  
Cytopathology), FIAC

Dr. Sajid Mushtaq  
MBBS, FCPS, FRCPath

Dr. Humana Qazi  
M.Phil, Ph.D Molecular Biology

Dr. Mujassar Hussain  
MBBS, FCPS (Histopathology)

Dr. Summiya Nizamuddin  
MBBS, FCPS (Microbiology)

Dr. Amin Hayee  
MBBS, DABP (AP/CP)

Dr. Noreen Akhtar  
MBBS, FCPS, FRCPath

Dr. Usman Hassan  
MBBS, FCPS, FRCPath

Dr. Asad Hayat Ahmad  
MBBS, DABP (AP, CP and  
Histopathology)

Dr. Muhammad Azam  
MBBS, FCPS, FRCPath

31 اپن نمبر 88 بی ایف نمبر 0307-82

0333-353

ہیڈ میٹر ہوائی نمبرز 2

سرور

نام یونین کونسل سرور

EMIS کوڈ نمبر 22118

GPF No	بک نام	فاتی اکاؤنٹ نمبر	پرسنل نمبر	CNIC NO	مکان برائیں	کوئی کال سے	موجودہ سکول کے تاریخ	میں باہر لینے کے تاریخ	تاریخ تقریری بعد از ٹیگ	تاریخ آغاز ملازمت	تاریخ پیدائش	موجودہ کریڈٹ لینے کا تاریخ	گریڈ	کنونت	ولدیت	نام مدرسہ/عہدہ بمعہ تعلیمی قابلیت	شمار	تعداد طلبہ درجہ درجہ		
																		اولی	ثانی	
7597	الرجح	4211	037384	15565-0212504-7	مسنور	کال سے	15-5-95	12-3-7	12-1-7	12-1-7	15-2-3	20-2-08	12	سنور	مسنور	مسنور	1	75	29	
7622	"	4871	02054414	15565-0209829-9	درجہ	کال سے	11-7-7	8-2-4	8-3-7	10-8-2	10-8-2	"	"	"	جلفزار	F.A	2	42	42	
12094	"	4966-2	02066231	15565-0207535-9	مکرور شی	کال سے	9-1-7	14-3-7	16-2-7	5-4-7	5-4-7	"	"	"	"	شمس البرز	F.A	3	30	18
8330	"	3425-7	02033558	15565-0207019-3	درجہ	کال سے	21-2-7	10-8-2	1-8-2	13-4-7	13-4-7	"	"	"	"	عبدالکریم	M.A	4	17	27
19429	"	4655-1	02026993	15565-0205508-3	درجہ	کال سے	4-7-7	21-9-2	26-8-2	10-2-6	10-2-6	"	"	"	"	حنیفہ	M.A	5	18	34
19433	"	4070-4	02020440	15565-0205166-9	درجہ	کال سے	3-7-7	9-7-5	4-9-6	1-9-6	1-9-6	"	"	"	"	شمس الرحمہ	FA	6	16	30
19436	"	3222-1	02020449	15565-0218676-1	درجہ	کال سے	16-9-7	27-7-7	27-6-7	11-7-7	11-7-7	"	"	"	"	شاہزادگان	FA	7	18	38
19436	"	3355-3	0204821	15565-02220702-5	درجہ	کال سے	5-1-7	20-9-7	20-7-7	8-7-7	8-7-7	20-7-7	9	"	"	مسنور	MA	8	17	18
																		29	117	181

ادھار

مدرسی

مدرسی اور غیر مدرسی عملہ	
خالی	نمبر شمار
	نام پوسٹ
	منظر شدہ سامان
	پائسٹی
	چکیار
	دیگر

مدرسی اور غیر مدرسی عملہ  
 1- دفتر مسٹر انچارج  
 2- دفتر مسٹر انچارج  
 3- دفتر ADO سرور  
 نوٹ: یہ گوشوارہ ہر مہینے کی 25 تاریخ تک سنٹر انچارج کو بھیجنا ہے

عمارت نمبر  
 1- نوٹس  
 2- سالگرہ 1993  
 3- نقل مکانی  
 4- نقل مکانی  
 5- نقل مکانی  
 6- نقل مکانی  
 7- نقل مکانی  
 8- نقل مکانی  
 9- نقل مکانی  
 10- نقل مکانی  
 11- نقل مکانی  
 12- نقل مکانی

سرور

سرور

سرور

سرور

سرور

سرور

سرور





0333-4585644  
0301-8962225  
0996-853825

38 گرام پبیک سیکرز اینڈ سٹیشنری مارٹ

گورنمنٹ پرائمری اسکول پورن شاہنگ

تاریخ 25/10/2014  
برائے پیشی

- 100/- = 10 x 40 (10)
- 1700/- = 700 x 2 x 350 (2)
- 540/- = 90 x 6 (3)
- 200/- = 100 x 2 (4)
- 250/- = 25 x 10 (5)
- 1600/- = 80 x 20 (6)
- 2100/- = 300 x 7 (7)
- 2400/- = 400 x 6 (8)
- 1500/- = 300 x 5 (9)

10690/- = 10690 (Total amount)

Ghancha Din  
Head Teacher  
25-10-2014

گورنمنٹ پرائمری اسکول پورن شاہنگ  
0996-853825/0345-9088722

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ATTESTED

0333-4585644  
0301-8962225  
0996-853825

گورنمنٹ پبلک سکول برائے پبلسی  
گورنمنٹ پبلک سکول برائے پبلسی

39

گورنمنٹ پبلک سکول برائے پبلسی

تاریخ 23/09/2013 برائے پبلسی

- 1) 500/- = 10 x 50 cliper
  - 2) 28.00/- = 700 x 4 W.B
  - 3) 12.00/- = 300 x 4 W.B
  - 4) 1600/- = 400 x 4 - G.A King
  - 5) 1500/- = 300 x 5
  - 6) 1600/- = 80 x 20 CA
  - 7) 300/- = 25 x 12
  - 8) 100/- = 100 x 1
  - 9) 1080/- = 90 x 12
- 
- 10680 =

Head Teacher  
GPS  
26/09/2013

گورنمنٹ پبلک سکول برائے پبلسی  
0996-853825/0345-9088222

Handwritten signature

ATTACHED

# FAZAL HAQ HARDWARE

0342-1952549  
0331-9201426



## فضل حق ہارڈ ویئر

40

ذیل رقم قبضہ، چیک، منگنی، تالہ  
تاریخ 24/10/2014

میں بازار سندی پوران

394

میں بیورو گورنمنٹ ہائی اسکول کوہہ

روپے	نرخ	تفصیل	تعداد
16.00/-	800	2. فورس لوہا	2
7.20/-	180	4. فلور بیٹری	2
3.200/-	1600	2. فلور بیٹری	2
7.00/-	350	2. فلور بیٹری	2
<p>6.220/-</p> <p>جمعہ زر و نقد</p>			

*Signature*  
Ghancha Dina PST  
Head Teacher  
Puran Shangla  
24/10/2014

Fazal Haq Hardware and Paints Store

Fazal Haq  
Bazar, Sondi Pura  
0342-1952549 0331-9201426

0347-5130230

ATTACHED

0333-3665253  
0300-8127924  
0333-3302697  
0300-8127997

# Muhammad Electric Store



(41)

پروپرائیٹرز: داؤد اینڈ محمد احمد  
آئی آر جی ہیرا ریکٹ تجویزی روڈ بالقاتیل جاز ٹاور اوج پورن

نمبر — گورنمنٹ ہائی اسکول کونڈی

2000 — ریفریجریٹیشن

1000 — اسٹیل ٹیبل

100 — 2 کنڈرٹین کنڈر

40 — 2 پمپ سٹیم

40 — اسٹیل ٹیبل

90 — 6 پمپ سٹیم

3270 — اسٹیل ٹیبل

3270 — اسٹیل ٹیبل

Attested  
Head Teacher  
Govt. Middle School  
Martuba Pura Distt. Shargha

Shanika D. PST  
Head Teacher  
Martuba Pura Shargha

4

4

42

قرار داد والدین اساتذہ کونسل

گورنمنٹ پرائمری اسکول اہل بابا رینڈری سکول کوہ (پورن) ضلع شالہ

ایجنڈا:

- (1) وصولی نرسٹری قسم
- (2) تعمیر و ترمیم والا سکول گھر
- (3) اساتذہ کی فونڈ، فوڈنگ اور دیگر امور

کارروائی اجلاس:

تاریخ: 25 ستمبر 2014ء  
 مقام: گورنمنٹ پرائمری سکول کوہ (پورن) سکول کی والدین اساتذہ کونسل کا اجلاس  
 صدرات جناب عبدالکامر صاحب منعقد ہوا۔ اجلاس کا باقاعدہ آغاز تلاوت کلام پاک سے ہوا۔ جناب عبدالکامر صاحب نے تلاوت فرمائی۔ بعد ازاں ایجنڈہ پر بحث ہوئی۔ اس میں کافی غور و خوض کے بعد سکول میں باقاعدہ ریلی والی کمیٹی کے لیے اجلاس منعقد کیے گئے اور سکول کی کمیٹی کے اجلاس سے متعلقہ نئے ایجنڈے پر فیصلہ کیا گیا۔

- (1) پرائمری میں (1) عظیم الظہاریم (2) عقل زادہ (3) کامران
- (2) پرائمری میں (1) نور علی (2) سید زادہ (3) گرم
- (3) پرائمری میں (1) حمزہ (2) غنیہ دینی (3)

اجلاس میں فیصلہ کیا گیا کہ سکول کے تمام امور کا باقاعدہ آغاز ہوا۔ اسے تمام امور کی کمیٹیاں بنائی جائیں اور ان کے ذریعے سکول کی کامیابی کے لیے کام کیا جائے۔

- (1) اساتذہ کی وصولی نرسٹری قسم کو وصول کرنے کے لیے کام کیا جائے۔
- (2) سکول گھر کی تعمیر و ترمیم کے لیے کام کیا جائے۔
- (3) اساتذہ کی فونڈ، فوڈنگ اور دیگر امور کے لیے کام کیا جائے۔

- (1) سکول میں PTC کمیٹی (1) عظیم الظہاریم (2) عقل زادہ (3) کامران (4) نور علی
- (5) سید زادہ (6) غنیہ دینی (7) حمزہ (8)

دستخط چیمبرمین: عظیم الظہاریم  
 نام: عظیم الظہاریم  
 ممبر: Chancha Din PST

دستخط سیکرٹری: Chumela  
 نام: غنیہ دینی  
 ممبر: Chancha Din PST

Chancha Din PST  
 Head Teacher  
 GPS Koro Pura Shalgia  
 05/09/2014

25 ستمبر 2014ء

[Signature]

18/04/14

مختصہ آئی سی اے میں دوران سب ڈیوٹی

مختصہ آئی سی اے

(43)

عنوان

وزارت کی جانب سے آئی سی اے کوہ کی خدمت میں

کی ضرورت ہے۔ یہ تمام باونڈری والے کلاس سے منظور

ہو چکی ہے۔ تمام ان پوسٹوں میں باونڈری والے کلاسوں

کیلئے متعلقہ بیٹاری نیاز، تحصیلدار کو حکم صادر فرمایا۔  
یہ تمام متعلقہ بیٹاری غائب ہوا کرتے ہیں۔

یاد رہے

تمام فرماں غائب ہیں، یہ تمام بیٹاری کوہ

دوران سے متعلقہ

10/04/14

[Signature]

Chanda D. PST  
Head Teacher  
Govt. School, Puzan Sharada

10-4-14

[Signature]

[Signature]

19/04/14

NOTED

The application in original  
is forwarded for n/a if  
possible please.

10/04/14  
Assistant District Officer  
(PPT) Chanda Puzan (A.C. D/O)

Tehsildar, Puzan  
for n/a P.

[Signature]  
AC/SD/PT. Puzan

17/04/14

18/04/14

سب سے زیادہ اہمیت رکھتا ہے

یونٹ سڈیو SDEO صاحبہ جناب عالی

44

عنوان: درستی کا نام تبدیلی

آداب: گورنمنٹ کے لئے ہے کہ اس سال گورنمنٹ پرائمری اسکول کوہ (پورن) میں امتحان سلازم

میں چالیس (40) طلبہ پاس ہو چکے ہیں۔

بہتر ان کیلئے سب سے زیادہ بنانے وقت معلوم ہوا کہ چند طلبہ کے گریڈز انتہائی زیادہ

یعنی 18، 19، 20 سال تک پہنچ چکے ہیں۔ (منسٹر رٹ کے نام سے راج ہیں)

جناب والا: یہ بچی انتہائی دور دراز پناہ علاقے میں غربت کے آخری پتھر سے چلی آئی ہیں

گزار رہے ہیں۔ دو بہت زیادہ عمر ہیں

انتہائی غربت کے مارے اسکول کے پورے پورے داخل ہونے کا مسئلہ کا حل ہی نہیں ہو سکا ہے

(ii) کلاسوں میں داخل ہونا (iii) بوقت داخلہ خطی سے زیادہ مکلف وغیرہ وغیرہ

فرد قدرت انہیں یہ عرض گزار ہوں۔ کہ ان لایچارے بچوں کی حالت زار ہم اچھے و بیکار

مجھے ضرورت پڑتی جا رہی ہے کہ ان کی مستقبل تباہی سے بچ جائیں۔  
عین گزارش ہوگی

ملف

forwarded for n/a please.

جناب ذیشان عزیز پٹی PSHT CPS کوہ (پورن) صاحبہ

Chuncha Din PST  
Head Teacher  
Puran Shangla.  
10-06-2014

Date: 10-06-2014

SDEO (M)  
The application is forwarded in original is forwarded for n/a agree please possible

10/04/14  
Association of Teachers  
Punjab

Signature  
10/04/14

TESTED

3333-3355253  
3300-5127924  
3333-3302697  
3300-5127997

# RIANTE ELECTRONICS

## حصيف اليكترونيكس

(8)  
48

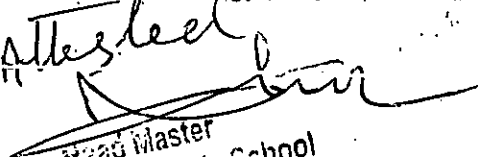
تاریخ 25/10/2014

نمبر 2335

گورنمنٹ پرائمری سکول کوسہ

تعداد	تفصیل	نرخ	روپی
11	لو رڈ 8+2	400	4400
21	4+2	350	7350
21	7129	2000	42000
31	3129	1000	33000
31	ٹسٹ	50	1500
6	<del>ٹسٹ</del>	100	<del>6000</del>
11	ٹسٹ	350	3850
4	ٹسٹ	150	600
300	ٹسٹ	300	90000
20	ٹسٹ	80	1600
11	ٹسٹ	20	220
61	ٹسٹ	40	2400
			10710

ٹائپنگ پرائمری سکول کوسہ: فون: 812240

Attested  
  
 Head Master  
 Govt: Middle School  
 Martuba Pura Distt: Shangla.





49

Date: 24/9/2014

9. P.S.

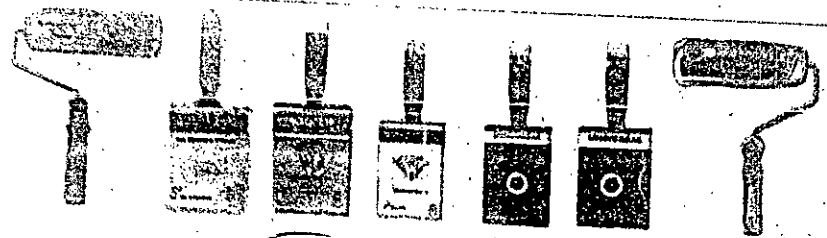
11000 - 427 - Summary

4500 - 622 - Summary

10500 -

per

FOR PUBLICATION ONLY. THIS IS NOT A COMPANY DOCUMENT

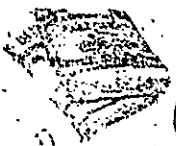


Attested  
*[Signature]*

Head Master  
Govt. Middle School  
Martuba Puran Distt. Shangla.

152,835

*[Signature]*



# سٹیبل سپنٹ ایجنسی

پوران ڈیپارٹمنٹ

گورنمنٹ سکول

فون: 0333-8533171-0341-4001602

50

نمبر: 100  
عنوان: سکول کی تعمیر و مرمت

تاریخ: 10/10/2023

نمبر	تفصیل	مبلغ	ملاحظات
1	پورن کی سہولت	500	
2	سیرنگ	300	
3		25	
4	مزد دوری		
5	ڈیوٹی چارج	3250	
6			
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23			
	کل	3350	

مختار علی

دستخط

مہران پبلک سکول، لاہور: 711370

Attest  
Head Master  
School

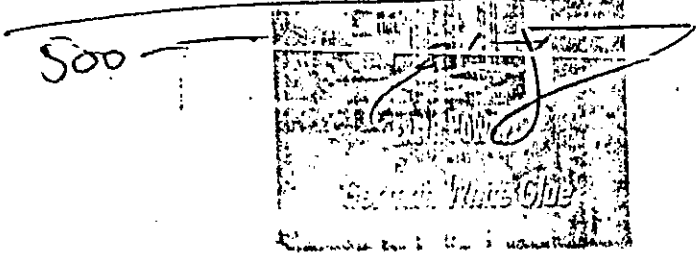
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BERGER

Trusted Worldwide

17/10/01/16 G.P.S. نام کوٹہ

280  
200  
20  
140  
50  
10



*Settled*

Attested  
Head Master  
Govt. Middle School  
Martuba Pura Distt: Shangla

BERGER PAINTS PAKISTAN LIMITED

36 - Industrial Estate Kot Lakhpat Lahore. Tel: 042-35151545-46 Fax: 042-35151549 UAN: 111-237-437

*A*

BERGER PAINTS PAKISTAN LIMITED



51



# گورنمنٹ سکول کھنسی

پوران ڈسٹرکٹ

0333-8533171 0341-4001602

52

نمبر \_\_\_\_\_  
نام \_\_\_\_\_  
تاریخ \_\_\_\_\_

نمبر \_\_\_\_\_  
تاریخ \_\_\_\_\_

شماره	تعداد	نوع	قیمت
1	585	پورٹریٹ	11700
2	60	پورٹریٹ	1600
3		پورٹریٹ	150
4			
5		گورنمنٹ	3400
6			
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16			
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22			
23			13600/-

پوران ڈسٹرکٹ سکول کھنسی 7143701

Attested

Head Master  
Middle School

A

4

53

4

17

(مع نامہ)

آئی ایم ایف کے ساتھ ساتھ دیگر فصلوں کے لئے سالانہ...

قرض کی رقم (10 لاکھ روپے) کو...

درج ذیل کے قرضوں کو...

آئی ایم ایف (8500)...

یہ رقم...

(مبلغ)...

کے لئے...

دستخط...

30/11/14

Headmaster  
Govt. Middle School  
Martuba Puran Distt. Shangla.

Attested  
Head Master  
Govt. Middle School  
Martuba Puran Distt. Shangla.

Handwritten mark

ہمارے ہاں ہر قسم حسی چادر، سریا، بیسٹ، پیٹ، سینٹری اور ہر قسم گیت آرڈر پر تیار کیا جاتا ہے۔

54

0302-8531208-0332-8531208-0345-8531208

بازار پوران الونج طلع شانگلہ تاریخ

نام 3.3

نمبر شمار	تعداد	تفصیل	نرخ	روپے
1	18	سلاخوں کے	500	9000
2				
3	1	ٹوکوں	120	180
4				
5	2	دو سلاخوں کے	120	240
6				
7	2	دو سلاخوں کے	120	240
8				
9	20	سلاخوں کے	10	200
10				
11				
12				
13				
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21				
22				
23				

Attested  
 Head Master  
 Govt. Middle School  
 Martuba Puran Distt. Shangla

812509

Handwritten signature

55

6

تاریخ: 15/11/2017  
 نام: محمد رفیق  
 شمارہ نمبر: 2175

شمارہ نمبر	تفصیل
1	چونا
2	بندو
3	سول
4	
5	
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23	

2175/11/17  
 تفصیل  
 رتبط

711370: مہران پریس ٹیکارہ ہون

Attested  
 Head Master  
 Govt. Middle School  
 Martuba Pura Dist: Shangle.

af

گورنمنٹ ہائی اسکول کراچی

154835 = ...  
 356165 = ...  
 511000 = ...

56

تفصیل	مقدار	نمبر
3160 =	درجہ 1	①
500 =	2	②
2175 =	3	③
6500 =	4	④+
10100 =	5	⑤
1650 =	6	⑥
375 =	7	⑦+
1410 =	8	⑧+
500 =	9	⑨+
250 =	10	⑩+
241 =	11	⑪+
950 =	12	⑫+
13949 =	13	⑬+

41750 =

(اگر کسی چیز کے بارے میں شک ہو تو اسے صاف کرنا)

Attested  
 Head Master  
 School



OFFICE OF THE DISTRICT EDUCATION OFFICER (M)

ELEMENTARY AND SECONDARY EDUCATION SHANGLA

E-Mail: deomshangla@gmail.com

Phone #:0996-850639

G-57

OFFICE ORDER:-

Whereas, in compliance to the Judgment of Honorable Khyber Pakhtunkhwa Service Tribunal Camp Court Swat regarding service appeal No: 1090-2015 vide letter No: 295/ST dated Peshawar the 08-02-2018 and subsequent No. So (lit-ii) E&SE /1-35# 1090-15 Ghuncha Din dated Peshawar the 14-02-2018 (received this office 15-02-2018) regarding to hold denovo proceedings.

Whereas, the enquiry committee constituted to hold denovo proceedings against Mr. Ghuncha Din PSHT vide this office order issued under Endst; No: 4336-37 dated 3-3-2018.

Whereas, charge sheet and statement of allegation issued to accuse teacher in complainece with the Honorable Court direction vide order issued under Endst; No: 5057 dated 9-4-2018 and a letter issued to enquiry committee to conduct the said enquiry on priority basis with clear cut recommendation vide this office memo No:8058-59 dated 09-04-2018 .

Whereas the denovo enquiry report received to this office on 04-05-2018.

Whereas the show cause notice was served upon Mr. Ghunch Din, to submit his written reply to the show cause justifying his position against the charges proved as per the enquiry report wherein he was given a chance for personal hearing.

Whereas, he submitted a written reply to the show cause dated 14-5-2018 vide which he failed to satisfy the competent authority.

Whereas, personal hearing took place on 14-05-2018 and here again he could not justify his position.

Whereas, in exercise of power conferred by the Khyber Pakhtunkhwa , government servant (E&D) rules 2011, the competent authority has decided to impose upon him the minor penalty under 4 Sub Rule a(iii) the said rules for being guilty of "misconduct", "corruption", "inefficiency" and "absenting himself from duty" as per rules 4 Sub Rule a(iii) of the said rules.

Whereas, recovery of salaries for the absent period of two years and eight days with effect from 15-4-2013 to 23-04-2015 converted in to leave without pay. Furthermore the recovery of Rs.28000/- as PTC Fund may be deposited in PTC Account for having been proved as irregular expenses in the interest of public service with immediate effect.

DISTRICT EDUCATION OFFICER (M)  
SHANGLA

Endst: No:-

9333-40  
1 PF G. Din

Dated:- 16/5/2018

Copy of the above is forwarded to:-

1. The Registrar Khyber Pukhtunkhwa Service Tribunal Peshawar with reference to his memo as mentioned above.
2. The Director E&SE Peshawar
3. The District Accounts Officer Shangla
4. SDEO(M) Puran for information and n/a at his end please
5. ADEO Litigation local Office
6. ASDEO circle
7. Head Teacher GPS Chagam No-2
8. Mr. Ghunch Din PSHT through SDEO concerned.

DISTRICT EDUCATION OFFICER (M)  
SHANGLA

نہا اسل ٹا ڈاؤن 8 KPK (2)

33 حضور صند ڈاؤن ریپ ڈاؤن ایپ ڈاؤن اسٹینڈنگ ایڈیشن ضمیمہ طور پر پیش کردہ

H (58)

نہا اسل ٹا ڈاؤن ضمیمہ DEU میں شامل کیا گیا ہے۔

9333/40

آڈیٹ... جوڈیٹوری ایس جوائنٹ آڈیٹ... 18/05/19

یہ صادر شدہ ضمیمے میں چند ناقابل تردید خالصتوں کو (موجودہ ایس جوائنٹ) پر مبنی ہے۔

یہ تمام ایک طرف سے منطقی طور پر معیاری کام میں تعمیر نافذ کاری کے ذریعہ

De-moralization

کثیر تعداد میں... اس کے نتیجے میں اس کے نتیجے میں... اس کے نتیجے میں

جو رقم وہ طلبہ... رقم... 683000

توجہ دہشت اور میں برصغیر... Huge amount... utilization

توجہ دہشت اور میں برصغیر... Duration... جو رقم دو سالوں میں خرچ

شخصی... نہا اسل ٹا ڈاؤن... جو رقم دو سالوں میں خرچ

نہا اسل ٹا ڈاؤن... Pursue... جو رقم دو سالوں میں خرچ

نہا اسل ٹا ڈاؤن... جو رقم دو سالوں میں خرچ

نہا اسل ٹا ڈاؤن... جو رقم دو سالوں میں خرچ

نہا اسل ٹا ڈاؤن... جو رقم دو سالوں میں خرچ

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I-59

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M) DISTRICT SHANGLA  
AT LILOWNAI ROAD DISTRICT COMPLEX.

Contact # 0996-850939. Fax # 0996851108.  
Email deomshangla@gmail.com

No. 3482

Dated 8/10/2018.

To

The SDEO (M)  
Primary Puran District Shangla.

Subject:-

Appeal

Memorandum:-

Reference is made to Director Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar vide his memo No: 5267/F.No 162/Vol:XII/KC/Appeal  
of PST (M) General dated Peshawar the 30-08-2018.

Keeping in view of the above contents it is intimated that the  
appeal of Mr. Ghunch Din PSHT GPS Kooh Puran Shangla has been rejected by the  
competent authority, hence inform him accordingly.

  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA.

Dated \_\_\_/\_\_\_/2018.

Endorsement No. \_\_\_\_\_/

Copy of the above is forwarded to:-

1. P.A to Director E & SE Khyber Pakhtunkhwa Peshawar with reference to his  
memo mentioned above please.





DISTRICT EDUCATION OFFICER (M)  
SHANGLA.

VAKALATNAMA

*Before the KP Service Tribunal, Peshawar*

APPEAL No. \_\_\_\_\_/2018

*Gumcha Din*

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

*Education Department*

(RESPONDENT)  
(DEFENDANT)

I/We *Gumcha Din*


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

Dated. \_\_\_\_\_/\_\_\_\_\_/2018

  
\_\_\_\_\_  
CLIENT

  
\_\_\_\_\_  
ACCEPTED

**NOOR MOHAMMAD KHATTAK**

  
\_\_\_\_\_  
**MUHAMMAD MAAZ MADNI**  
ADVOCATES

OFFICE:

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



201  
50

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA.

OFFICE ORDER:-

Consequent upon Khyber Pakhtunkhwa Service Tribunal camp Court Swat decision dated: 31/01/2018 regarding service Appeal No: 1090/2015 i/r of Mr. Ghuncha Din S/O Abdul Karim PSHT GPS Kooch Puran vide letter No: 295/ST Dated: 08/02/2018 from the Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar.

The following de novo enquiry committee is hereby constituted to peruse and re-enquire the case with the directions to submit clear cut recommendations to proceed further accordingly

1. Mr. Sultan Sikandar H/M GHS Sheshan (Chairman).
2. Mr. Mirza Ali Principle GCMHS Alpurai. (Member)

  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA

Endost:-No. 4336-37 /P.F. Ghuncha Din Court File

Dated 3/3/2018.

Copy of the above is forwarded for necessary action to:-

- 1- Chairman & Member of the Committee for compliance please.

  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA



201 (56)

OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA.

No. 8258-59 /P.File Ghuncha Din.

Dated 9/4/18.

To;

1. Mr. Sultan Sikandar H/M GHS Sheshan.
2. Mr. Mirza Ali Principle GCMHS Alpurai.

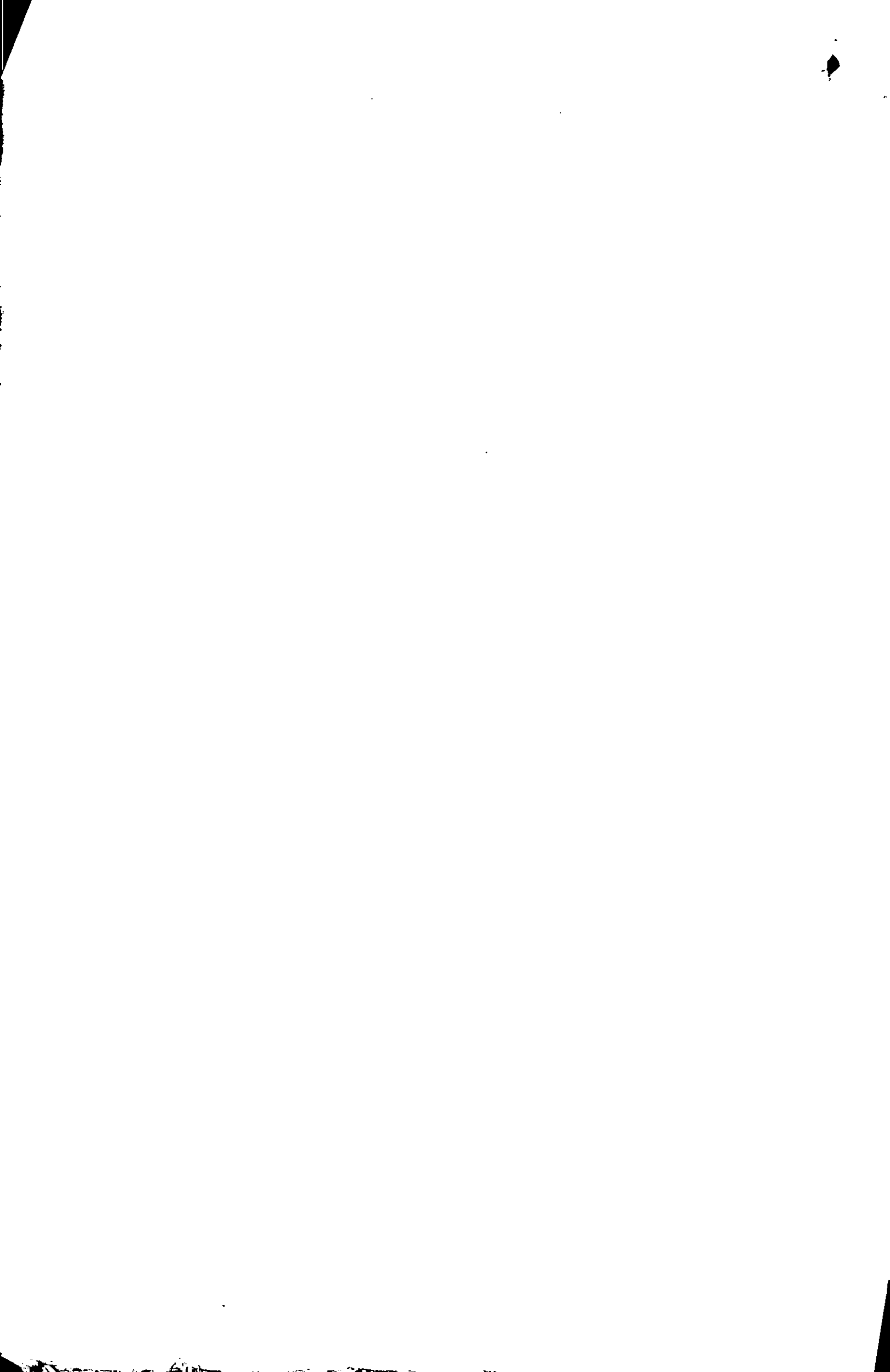
Subject;

**DE NOVO ENQUIRY AGAINST MR. GHUNCHA DIN PST GPS CHAGAM NO: 2  
(AS PER COURT DECISION)**

Memo:-

Reference to this office order under Endst: No:4336-37 Dated: :-03/03/2018 you are hereby directed to please conduct the said inquiry within 3 days on priority basis with clear cut recommendation in order to proceed further as per court decision please.

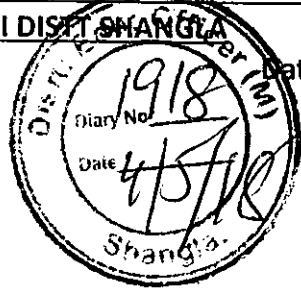
  
DISTRICT EDUCATION OFFICER, (M)  
SHANGLA



**OFFICE OF THE ENQUIRY COMMITTEE PRINCIPALS GCMHS ALPURAI & GHS SHESHAN**

**LILOWNAI DIST. SHANGLA**

No. 1568 /  
To



Dated: 03/05 2018

The District Education Officer (M)  
District Shangla.

Subject: **DE NOVO ENQUIRY AGAINST MR. GHUNCHA DIN PST GPS CHAGAM NO:2 (AS PER COURT DECISION).**

**Introduction of inquiry:** In pursuance of the District Education Officer (M) Order No. 4336-37 dated: 03/03/2018 The undersigned namely Sultan Sikandar Headmaster GHS Sheshan and Mirza Ali Headmaster GCMHS Alpurai appointed as enquiry committee for the captioned above inquiry.

**PROCEDURE OF INQUIRY :-** The committee summoned the accused Government Servant on 12/04/2018 and all the concerned inquiry Officers, parents teachers council office bearer, complainants and necessary parties as witnesses to filter the grain from chaff. Due to denova inquiry the competent authority issued fresh charge sheet and statement of allegation for the end of justice.

Therefore, we the inquiry committee fulfilled all the requirements and acted the inquiry judicially, fairly, Impartially because we are duty bound to make a judicious consideration of facts of the case to arrive at correct conclusion and not to infringe upon the rights of any one. We applied two minds to each and every matter independently and according to the spirit of law. Proceedings having been taken according to the Govt servants rules. We completed the inquiry in such manner as we think best fitted to do substantial justice. Elementary right of defense accorded them detail thereof is as under.

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Subof  
4/5/18

**CROSS EXAMINATION AND PROVISION OF ALL AVAILABLE DOCUMENTS:-** The opportunity of cross examination was afforded to the accused Govt: Servant. The written statement also recorded of all the summoned witnesses. All the relevant documents were provided. Reply to the charge sheet & statement of allegation also furnished by the accused along with his supporting documents.

**History sheet of the accused Govt Servant:**

- 01. Complaint of village Baker against Ghuncha Din PTC Vide No. 174 dated: 12/04/1994. Annexure A. placed on page no 1 of the accused personal file.
- 02. Complaint filed by the inhabitants of GPS Atesh Kotkay against the accused Govt servant placed on page no 22 and on page 42 as annexure B.
- 03. Report of Sultan Room Learning coordinator (LC) on 16/09/2000 against absenteeism of Ghuncha Din PST GPS Atesh Kotkay placed on page no 15 of P.F. The inquiry committee Abdu Tawab ADO endorsed on Page. 26. Resultantly Converted in EOL by District Education Officer Swat Vide No.4832 dated 10/10/2000 and also stopped the pay

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DA-I  
Put up weekly  
9/5/18

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*Handwritten signature:*





- although stoppage of pay does not exist in the disciplinary rules in vogue. aforementioned documents are Annexure C to E.
04. Mr. Ghuncha Din filed complaint against Zainul Haq PTC GPS Atesh Kotkay regarding embezzlement on 18/07/2000 & irregularities placed on page 38, 39. As Annexure F.
  05. DEO (M) Swat initiated inquiry against Ghuncha Din PST GPS Atesh Kotkay as absence from duty vide No. 573-76 dated 31/01/2001. Placed on Page No.37 as annexure G.
  06. The inquire conducted by three ASDEOs vide no 2514-16 dated 14-06-2001 on the complaint of accused Govt servant against Zainul Haq PTC GPS Atesh Kotkay wherein reported that Ghunch Din is absent w.e.f 9/3/2000 to 23/02/2001 i.e inquiry report placed on page 53 to 59 annexure H.
  07. The District Officer Education Swat converted his absence period 1/9/2000 to 23/12/2000 (114) days, 24/12/2000 to 28/02/2001 (67) days and 1/3/2001 to 6/3/2001 (6) days as earned leave on full pay. placed on page 66 annexure as I.
  08. Statement of allegation & charge sheet issue vide 6773 dated 09/11/2013 on the complaint against the accused Govt servant placed on Page No. 118 ,121,122 annexure J.
  09. Mr. Akbar Ali SST GHSS Sandovi/inquiry officer categorically reported that Mr. Ghuncha Din hired a substitute teachers w.e.f April 2013 till date of inquiry i.e 30/11/2013 in lieu of Rs. 7000/ placed on Page No. 128 as annexure K.
  10. Show Cause on Page 129 regarding inefficiency, Guilt of corruption guilt of habitual absence vide No. 442-44 dated 24/01/2014 issued by District Education Officer(M) Shangla as annexure L
  11. Chairman PTC Mr Absu Zahir showed his satisfaction from the duty of the accused Govt servant placed on page 136 and 138 as annexure M.
  12. Dost Muhammad PST & Nazir Muhammad Chowkidar also endorsed absence from duty & substitutes hired by the accused Govt servant placed on page. 155 as annexure N.
  13. Report of SDEO placed on Page 156,157 and 158 revealed that Mr:Ghuncha Din considered deptt: his subordinate so ill behavior. Further recommended recovery, ii down grading iii. Embezzlement as annexure O.
  14. DEO Shangle imposed the impugned penalty vide 1136-40 dated 26/05/2015 after show cause notice Placed on page 161 as annexure P.
  15. Mr. Abdul Haleem ADO visited the school and partially satisfied from the accused placed on page 167 to 169 as annexure Q.
  16. ASDEO Circle marked the accused absent on 10/12/2015 according to logbook placed on Page No. 172 and SDEO(M) called Explanation on Page 173 as annexure R.
  17. ASDEO Circle Alpurai on 15/12/2015 reported that Ghuncha Din found 3 days absent placed on Page 175 and warring issued by SDEO vide No. 1441 dated: 23/01/2016 placed on page 176 as annexure S.

**CURRENT PROCEEDING:**

The inquiry committee followed the procedure laid down by service rules all the concerned officials / complainants were summoned on 19/04/2018 to attend inquiry committee on 24/04/2018. Daily proceedings were decided. Copy attached as annexure V.

*[Handwritten signature]*

*[Handwritten signature]*

13/4/13

Mr. Ghuncha Din summoned for 12/04/2018 when he attended the inquiry committee the accused reported that he has not received charge sheet & statement of allegation & school record so far. He requested for adjournment so adjourned up to 19/04/2018.

On 19/04/2018 the accused and Mr. Fazal Subhan PST GPS Koo alongwith school record attended, Mr. Fazal Subhan PST recorded his statement and the accused examined him crossly but to the non availability of complete record as raised by the accused we summoned Mr. Abdus Zahir PSHT as laid down under CPC. The accused again requested for adjustment to furnish reply to the charge sheet. We accepted his plea and date adjourned upto 20/04/2018.

On 20/04/2018 contacted on phone that the accused could not attend inquiry committee and date adjourned till 21/04/2018. On 21/04/2018 we the inquiry committee contacted him to ensure his attendance on 24/04/2018 to cross examine all concerned.

On 24/04/2018 the accused and Ex: SDEO (M) Mr. Aurang Zeb, Mr. Zoor Muhammad, Ex: ASDEO Circle Alpurai, Abdul Baqi PSHT Alpurai No.2, Abdu Zahir PSHT GPS Koo, Dost Muhammad Khan PST GPS Koo, Abdul Shakir (name Sake ) Chairman parent teachers council attended the inquiry committee and the remaining summoned officials remained absent from the proceedings.

On 24-4-2018 we recorded the statements of the above officials/relevant persons, the accused government servant cross examined. Attached as annexure T.

The accused again requested for furnishing reply by tomorrow so he furnished reply on 25-04-2018.

We examined all the documentary proof, statements of the witnesses' evidences recorded and cross examination of the accused and his reply to charge sheet and statement of allegations. We fully followed the rules which reproduces as below from the establishment code.

"Inquiry Officer/ Committee. To ensure that:-

- (1) The procedure laid down in Rule 6(1) to 6(5) is strictly adhered to during the inquiry proceedings.
- (2) The inquiry proceedings being of judicial nature in terms of rule 7, the Inquiry Officer has recorded the statement of witnesses on oath.[Rule 7(a)].
- (3) The accused officer is allowed to cross-examine the witnesses produced against him during the proceedings [Rule 6(2)].
- (4) The accused officer is afforded reasonable opportunity to produce his defence [Rule 6(1)(b)].
- (5) The case is heard from day to day and no adjournment is given except for reasons to be recorded in writing which should be reported to the authorised officer. No adjournment should exceed a week [Rule 6(3)].
- (6) The findings are recorded after due analysis and appreciation of evidence on record.

(Authority:-S&GAD's letter No.SORII(S&GAD)3(4)/78,dated 13.8.1985)

D.O letter It has generally been observed that in dealing with disciplinary cases against Government Servants due care is not taken to observe the provisions of Government Servants (E&D) Rules, 1973 and instructions issued thereunder. Certain legal and procedural irregularities and infirmities have come to the notice of the Federal Government particularly with regard to framing and issuance of Charge Sheet alongwith statement of allegations, appointment of Inquiry Officer/Inquiry Committee and conduct of inquiry proceedings and undue delay in the finalization of disciplinary proceedings etc. certain omissions are grave in




nature and failure to comply with the requirement of Government Servants (E&D) Rules, 1973 can vitiate the proceedings conducted against the accused officer. It is therefore, necessary that extreme care should be taken by the Authorized Officers, Inquiry Officers and the Authorities to ensure that disciplinary cases are dealt with according to prescribed rules and procedure.

**Outcome of the inquiry:**According to the dictate of our conscience and justification approach we are in the following fair and firm opinion."

The history of the accused shoed his willful absence, negligence, ill behavior with top, bottom & horizontal officials, his inefficiency and hiring substitute teachers. All the inquiry officers reported against the accused Govt servant as mentioned in history sheet.

The lacuna of the department also observed as follow that since long his inefficiency, absence from duty, alternate teacher hiring reported but despite all the department promoted the accused Govt teacher to PSHT in 2013 while seniority cum fitness,ACRs are the pre-requisite for promotion, resultantly exonerated him from all charges till 3013.

Similarly no punishment was accorded in case of absence & the lenient plea adopted by the department as conversion of absence period in leave with full pay as mentioned in history sheet.

Transfer has made as a punishment which is not punishment under the rules.

The department also failed to complete the course of inquiry in stipulated period which goes in favor of the accused as laid down in establishment code KP & E&D rules. The relevant portion of the establishment code is reproduced as below.

"Speedy disposal of Disciplinary Cases". I am directed to say that instructions for expeditious finalization of departmental inquiries against Government servants have not produced the desired results. It has been observed that inquiries against Government servants are dragging on for long periods. In some cases the slow progress of the inquiry proceedings provide an opportunity to the accused officials to win over the witnesses and consequently escape the clutches of law. In other, the protracted inquiries cause financial hardships, unnecessary mental anguish, frustration and demoralization of the accused officials in general and those whose promotions are due in particular. Inordinate delays in the dispensation of justice not only defeats its very purpose but also impairs public interest by causing financial loss to Government by way of payment of salaries and allowances to the officials concerned. One of the reasons for such delays is that no check is being maintained on the progress of such cases by the Departments concerned.

Considering the nature of charges and other facts, the decision not to hold an inquiry has been taken judiciously and not arbitrarily. Before taking such a decision, the authorised officer has taken into consideration the nature of charges and other facts and has satisfied himself that the allegations against the accused could be decided without holding an enquiry [Rule 5(3)]. (Though it is not a requirement of the rule that the reasons for not holding an enquiry be recorded, yet the check-point is necessary to ensure that the decision is in the interest of justice as required by rule and that there is no violation of the law of natural justice)."

The department is duly bound to follow the rules & regulations and all branches and inquiry officers must be equipped with these rules and regulation as well as procedure of the inquiries.

**Conclusion and findings:**

01. The accused teacher has found negligent in his duty time and again.

02. For the period 15/04/2013 to 23/04/2015 (2 years and 8 days) alternate teachers have performed school duty in place of Ghuncha Din accused and payment made by Ghunch Din out of his salary.
03. School PTC physical works record, vouchers and record is also incomplete up till now.
04. The accused teacher has also ill behavior, which is against the service rules.
05. It is also fact that proper departmental procedure has not been adopted against the accused teacher despite mentioning his gross irregularities which was the responsibility of the PSHT, ASDEO and SDEO and establishment branch of the DEO (M).
06. **Recommendation:**
1. The absent period/alternate period i.e 15/04/2013 to 23/04/2015 two years and eight days may be converted in leave without pay .
  2. The irregularities in parent's teacher's council physical works found as per report of ASDEO Abdul Haleem but the remaining works have been properly completed so recovery of Rs 28000 may be made from the accused and be deposited in the PTC account.
  3. The ASDEO circle in 2013 may be issued explanation and also warning to all branches to maintain sheet as prescribed in the esta code for such like cases as usually the inquiry officers accusing only the accused govt servant and conceal the irregularities of the department which is partiality. His demotion is untenable.
  4. The ASDEO circle may be directed to furnish his monthly performance report in future to ensure his efficiency till his retirement.
  5. The allegations leveled by accused against PTD needs enquiry.

Enclosure: Inquiry file containing 70 pages

It is requested that copy of the inquiry report in question may be provided to the accused and all relevant documents if he required so.

  
Sultan Sikandar  
Headmaster GHS Sheshan

  
Mirza Ali Headmaster  
GCMHS Alpurai

انٹرنیٹ پر D.E. سے ملنے والی معلومات کے لئے  
انٹرنیٹ پر D.E. سے ملنے والی معلومات کے لئے

12/5/18 کا سہولت Hearing اور شہکار

نوٹس کا جواب دینا تھا۔

میری تیارہ کلمہ نہیں ہے گنڈا ہے

14/5/18 کو سہولت Hearing اور

شہکار کو سہولت جواب کا موقع فراہم کرنا

عین وزارت ہوگی۔

سلطنت

بے گمان غنیمتیں آلاہ کلمہ ہے  
موضوع 12/5/18

تعمیر

تقریباً 200 دستاویز / ڈاکومنٹس میں سے  
انکوائری کیلئے کویشننگ کے تمام اڈوں کیلئے دستاویز  
ایک ہی جگہ دستخط کرنا ہر دفعہ سزا  
تیار ہوں، یہاں سے یہ ہتھیار ہتھیار  
کہ ہم صرف دو سال سے دورانہ سے official  
کہ تمام دستاویز ہر دفعہ دستخط ہوتے  
دستخط موجود ہیں۔ سب امور خود انہی  
اور ہم، خیر الرحمن نے دیکھی (کلیتاً)

Chunchoo  
11/05/2018

12

سوال نمبر 4 :- PTC و پٹر میں آپ کوہ کے بیان کے رُو سے یہ ثابت شدہ ہے کہ آپ و پٹر میں کامیابی سے باہر نہیں آتے۔ کیا یہ درست ہے؟ اگر درست ہے تو آپ کیوں اپنے باہر نہیں آتے؟

اگر بنیاد ہے تو آپ کس طرح اپنا نقطہ نظر ثابت کر سکتے ہیں؟  
جواب نمبر 4 :- صدر صنف کے چہرہ کا تعلق صدر سابقہ سے ہے، انہیں تو صنفیوں نے ساتھ لکھا ہے، اگر صدر صنف PTC جو پٹر / 511000 رقم سے ایک درجہ میں صنفیوں کو اس کا Show cause درست ہوگا البتہ اعلیٰ درجہ اور حقائق صدر سابقہ لکھا ہوگا۔ یہ فیروز سے جو اس کے درجہ کو چہرہ کا کتاب معنی ہوتا ہے۔

سوال نمبر 5 :- کیا یہ صحیح ہے کہ آپ کا سابقہ Show cause کا جواب اور PTC و پٹر میں کا بیان المرقوم 31/12/013 ایک ہی بیانی کی قلمی قلمبند کیا گیا ہے؟ اگر ہاں تو اس سے کیا تاثر ملتا ہے؟

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جواب نمبر 5 :- اگر نہیں تو آپ کس طرح اس کا جواب پیش کرتے ہیں؟  
جواب :- دلائل :- Show cause کا جواب یہ نہیں ہے، اس کے ساتھ دستاویز ہے جس کو اقرار نامہ کہا جاتا ہے۔ یہ صدر صنف PTC کا مجموعی بیانیہ دیکر لکھا گیا ہے۔ Show cause سے اس کے بالکل تعلق نہیں ہے۔ دونوں ایک ایک چیز ہیں۔



222  
Chuncho

سوال نمبر 6 - PTC پٹرین میں SDEO کو دوران انٹو انٹری کے دوران مجوزہ 23 4/015

جو بیان صحیح کیا ہے اس پر پٹرین میں کیا نہیں ہے اس کا مطلب کیا لیا جاسکتا ہے؟ کیا پٹرین کے پاس بقا؟  
SDEO اورنگ زیب کو چھ مہینے PTC کے لئے Statement  
نہیں کس درجہ کے لئے Add کر دیا ہے۔ چھ مہینے اس کے الگ الگ ہے اور اس کا ورڈ بھی موجود ہے۔

سوال نمبر 7 - اگر متبادل اشخاص اپنے جگہ کام کرنے کے تو آپ رکارد کس طرح  
جواب نمبر 7 - متبادل اشخاص؟

متبادل اشخاص سے جگہ کام کرنے کے لئے تو رکارد کے ساتھ ساتھ  
رکارد فراہم کرنا ضروری ہے اور کاؤنٹر فائیل بھی ہے۔  
original دستخط ضروری ہے۔

سوال نمبر 8 - کیا سرورس رولز میں متبادل شخص رکھنے کا کوئی جواز ہے؟ اگر ہاں  
تو کس طرح، اگر نہیں تو پھر آپ کیوں متبادل پٹرین رکھنے کے لئے؟

جواب نمبر 8 - سرورس رولز میں جواز نہیں ہے۔ اور نہ ہی اس کے لئے کوئی  
متبادل شخص کو۔ اور کس فرد کے ساتھ بطور الٹرنیٹ سب  
قریبی صاحبان کے رکارد کے لئے کوئی جواز نہیں ہے۔ سازشیں کو

Shumcha

سوال نمبر 9۔ جن سکولوں میں آپ ڈیوٹی پر تعینات تھے تو وہاں پر آپ نے خود ڈیوٹی نہیں کی ہے۔ ڈیوٹی سے اکثر غیر حاضر رہتے ہیں۔ جعلی دستخط کرتے ہیں۔

9  
ق

ان سکولوں میں خود ڈیوٹی انجام دی ہے۔ جعلی دستخط کیے بغیر پیش کریں۔ اگر جعلی دستخط کرتے تو ڈیپارٹمنٹ سے تنخواہ کیوں دینی ہے؟ اور سرورسنگ کو کیوں پکارتے ہیں؟

10  
ق

سوال نمبر 10۔ سرورسنگ کے مطابق Govt. کا کیا رویہ کیا ہونا چاہیے؟  
سرورسنگ سے servant کا رویہ نرم سائیکہ ہونا چاہیے۔ بقول میرٹ انٹیکوٹ لائن۔ مگر حکام الاصلاح، حضورؐ اور ائمہ دین سے مجھے اخلاق حدیث سے مکمل حاصل کرنے کی ضرورت ہے۔

سوال نمبر 11۔ کیا آپ اپنے کردار کے بارے میں کوئی قابل تقلید خاصیت لکھتے ہیں؟  
انسانیت، دہانت، Honesty۔ تقویٰ کے بارے میں کوشش کرتا ہوں۔ اللہ کے خوف سے۔ طالب علموں سے۔ جموں، راجستھان سے سب سے نفرت اور دشمنی رکھتا ہوں۔ میرا بفضلہ تعالیٰ راجستھان سے ہے اسلام آباد سے ہے۔ فارغ التحصیل اور MAB عد میں۔ مجھے دفتر تو دفتر علاج دوان میں چھوٹا قرار دیا گیا ہے۔

پالیسی چیمبر میں عبد الظہار سے بار بار

① یہ کہ عبد الظہار 2013-04-15 میں چیمبر میں تھا، لیکن تیسرے خلاف رپورٹ سے پہلے وہ 13-04-15 کو چیمبر میں تھا۔ چنانچہ فرسٹ (مروم) نامی شخص تھا۔

یہ کہ عبد الظہار کی طبیعت چیمبر میں تعیناتی بہت عرصہ بعد عمل سے لائی گئی تھی۔ یہ کہ 13-04-15 پر شیخ من H/T کے سکول میں جا رہے تھے، جو ان کے بارے میں سب سے پہلے سنی۔

یہ کہ اس بارے میں چیمبر میں PTC کے ہونا کہ فیڈ بک سے کہو یا نہیں سنا ہے۔ پھر وہ کسی ڈالوں کے خلاف SDE کے رپورٹ نہیں دیا۔ اگر ان کے بارے میں پتہ نہ ہو تو وہ SDE کا خود سافٹ ویئر

② DEMONO انوائٹری مینس سے بار بار میں۔ Add کیا گیا ہو گا۔ میرا اس سے کوئی تعلق نہیں ہے۔

یہ کہ میرا اور چیمبر میں ملنے سے سلطان سکندر اور مرزا علی کے ڈپارٹمنٹ کے لئے سب سے پہلے اور میرا صادق کا کردار ادا کیا ہے۔ تصویر کا ایک رخ دیکھو اور دوسرا Touch

ہی نہیں کیا۔ یہ کہ Accused میں جا تو یوں کا رخ سیدھا کرتے خوب لٹا ڈالے۔ جبکہ ڈپارٹمنٹ کی غفلت، غلطیوں، اختیارات کا ناجائز استعمال، کرپشن، لوٹ مار

اقرباء اور وہی جا صرف یہ بات نہ کہہ کر گھوڑا لگا کر ہے کہ اس پر ملنے بنا جا جائے۔ مزید یہ کہ جن لوگوں کی میں نے دوران انوائٹری نشا ندرت کی تھی، اور نا قابل تردید ہے۔

میں کا کردار کے رپورٹ Demono انوائٹری مینس کو دینی تھی (رپورٹ میں موجود ہے) کا ڈپارٹمنٹ میں سب سے پہلے خلاف لپکے باکار اور انتہیت کو تک کا حوالہ دیا۔ لیکن ان کو یہ جرات نہیں تھی

کہ ان جہوں کو تیار کر کے کرپشن حافیا (شوخور افسرز) سے صبر کر کے تھی یا سہاری کی ہے اور یہ میں واضح نہیں کیا گیا کہ ڈپارٹمنٹ کے کرپشن کارندے رشوت لیکر اختیارات کا ناجائز

استعمال کر کے صبر، سفارح کو پامال کرتے ہیں۔ اور نتیجتاً سزا عزیز باجواب اساتذہ تعلیمت ہیں۔ نیز یہ کہ جسے اور وہی سب سے پہلے SDE اور بعد (مروم) ASDE کے گھول کر چرچ کا موقع نہیں دیا گیا۔

یہ کہ صبر سے officially کا کہ سالوں سے ساری تعمیرات کام جس پر 110000 لاکھ آئی تھی کو دیکھے اور طعنیوں کے بغیر 28000/- مین عبد الظہار کے وقت کو تقویت پہنچائی ہے۔

یہ کہ ill behavior کے معیار کے Defination چیمبر میں نہیں کیا گیا۔ یہ کہ دوران انوائٹری متعلقہ افراد کو صبر خلاف (Statement) دینے میں آکسایا۔

لہذا Demono انوائٹری مینس پر شدید تحفظات ہیں۔ DE = صبر کو صاب سے کہنا کہ Honest

Demat سے رہتا ہے، ریٹائرمنٹ یا موت سے پہلے ڈیپارٹ کا عادی نہ ہو اور Speedy سے اس کی تفریق  
اگر افسران بالا اپنے حالت Subordinate کو اپنے کو SDEO کو مشورے ہمارے

مجموعہ میں، اور وہ ڈیپارٹمنٹ میں موجود افسران سے گفتگو، شہر اور کلاس وائز

الغرض حلف کے باوجود ایک بہت سے Absent declare کر رہے،

جو اس کے ساتھ اور سکولوں کا خلاف <sup>حافظ نام</sup> ہو گا

ہم جتنا Evidence اور ناقابل تردید دستاویزات آگے لائیں تو پیش چلا ہوں۔  
اتنا اثر سکندر اور مرزا علی پیش کریں جسے چاہئے تاکہ تیار ہوں۔ سب سے پہلے حلف  
کو سب سے پہلے اور دیگر فرائض کا ردائی کی گئی ہے۔ جو قدریں انصاف نہیں ہے۔ فقط

الحاضری  
Rashed

آپ کا نام و زمان غنیمت بن جائے MABE کے نام پر پورے حلف کے لئے  
12/05/2018 چار صفحات پر مشتمل آج کے تاریخ  
SDEO کے لئے حلف کو حوالہ دیا گیا

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**OFFICE OF THE DISTRICT EDUCATION OFFICER (M)  
ELEMENTARY AND SECONDARY EDUCATION SHANGLA**

E-Mail: deomshangla@gmail.com

Phone #:0996-850639

No. \_\_\_\_\_

Dated: \_\_\_\_/\_\_\_\_/2018

**SHOW CAUSE NOTICE.**

I Mr. Muhammad Amin District Education Officer (M) Shangla as competent authority, under the Khyber Pakhtunkhawa Government Servants (Efficiency and Discipline) Rule, 2011 do hereby serve upon you. Mr. Ghuncha Din PSHT as follows:

- a). you were reported absent w.e.from 15/04/2013 to 23/04/2015 (2 Years) and eight days as per report of PTC Chairman Dated: 23/04/2015 forwarded by SDEO(M) Alpurai vide letter No: 806 Dated: 12/05/2015.
- b). A de novo inquiry was ordered vide this office order No: 4336-37 Dated: 03/03/2018 and subsequent No: 8058-59 Dated: 09/04/2018 vide which Mr. Sultan Sikandar , H/M, GHS Sheshan and Mr. Mirza Ali Principle GCMHS Alpurai were appointed inquiry committee to probe into the matter as per Court decision and report accordingly.
- c). As per report of the inquiry Committee, the charges against you have been proved as you remained absent from your duties and also involved in embezzlement of PTC fund Amounting to Rs.28000, thereby recommended you to be proceeded as per E&D Rules 2011.
- d). In exercise of the power conferred by the Khyber Pakhtunkhawa, Govt: Servant (Efficiency & Discipline) Rules, 2011, the Competent Authority has tentatively decided to impose upon you, the major /minor penalty under the said rules for being guilty of "Misconduct " "Corruption " "inefficiency " and "absenting himself from duty" with the direction to submit your reply defense in writing within (Seven) days of the issuance of this notice as to why penalty of Rule 4(a &b) of the said rules should not be imposed upon you and also intimate whether you desire to be heard in person.
- e). In case you failed to submit your reply within the stipulated period , it will be presumed that you have no defense to offer and ex- parte decision will be taken against you .

(Muhammad Amin)  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA

Dated:- 5/5/2018.

Mr. Ghuncha Din PSHT  
Endst: No:- 2986-87

Copy of the above is forwarded to:-

- 1. The Director (E&SE) Edu: Khyber Pakhtunkhawa, Peshawar.
- 2. The Deputy Commissioner Shangla.
- 3. The SDEO (M) Puran with the directions to serve the notice to the official concerned received the reply and forward the same with your comments/ suggestions please.

DISTRICT EDUCATION OFFICER (M)  
SHANGLA

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OFFICE OF THE  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA.

No. 93151 Dated 12/5/18.

To

The Sub: Divisional Education officer,  
Puran.

Subject: - PERSONAL HEARING.  
Memo:-

Reference to the disciplinary proceedings against Mr. Ghuncha Din, PSHT, you are hereby directed to attend this office along with Mr. Ghuncha Din, PSHT and ASDEO(M) Circle Puran in connection with personal hearing of Mr. Ghuncha Din on 12/05/2018 in this office in order to proceed further accordingly please.

Endost: No:- 9316-17

Copy forwarded and information and compliance.

1. The Circle Officer Concerned.
2. Mr. Ghuncha Din PSHT through SDEO (M) Concerned.

  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA

.Dated:- \_\_\_/\_\_\_/2018.

  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA

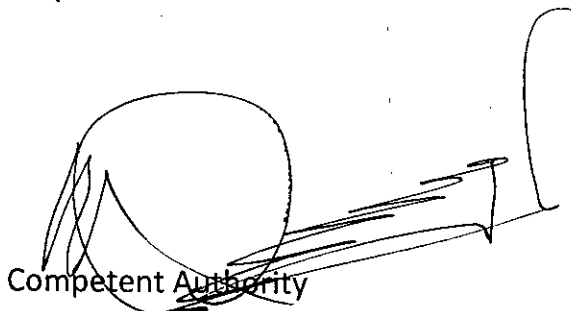
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**CHARGE SHEET**

I, Muhammad Amin, District Education Officer(Male) Shangla as competent authority, hereby charged you, Mr. Ghuncha Din, PSHT GPS Kooch Puran as follows:

1. That you, while posted as PSHT committed the following irregularities:
  - a) Guilty of misconduct as per visit report of SDEO(M) Alpurai vide letter under Endst: No.806 dated:12/05/2015 along with statement of School PTC, school staff as well as the statement of an alternate teacher working in the school.
  - b) Inefficiency as no proper record was maintained during utilization of huge amount of DFID/PTC Fund while carrying out the construction work in the concerned school.
  - c) Habitual Absenteesm w.e.f 15/03/2013 to 23/04/2015(739 days) i.e 2 years and 09 days.
  - d) Embezzlement of PTC Fund amounting to Rs.28000/- as per report of ASDEO(M) Circle Puran dated:09/10/2015.

1. By reason of the above, you appeared to be guilty of misconduct under rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in rule 4 of the said rules.
2. You are, therefore required to submit your written defense within seven (7) days of the receipt of this Charge Sheet to the inquiry committee.
3. Your written defense, if any, should reach to the inquiry committee within the specified period, failing which it shall be presumed that you have nothing to put in and in that case an ex-parte action will be taken against you.
4. Intimate whether you desire to be heard in person.
5. A Statement of allegation is enclosed.

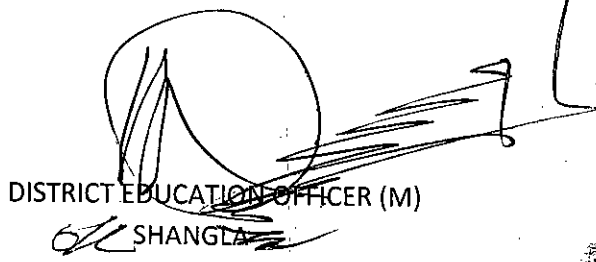
  
Competent Authority

DISTRICT EDUCATION OFFICER (M)  
SHANGLA

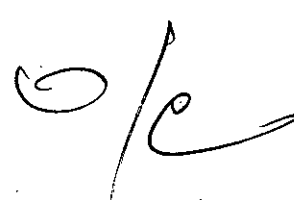
Ends: No 5057 / PF - Ghuncha Din/PST

Dated: 9/4 /2018.

Copy:  
1. Mr. Ghuncha Din, PST GPS Chagum-2 Puran.

  
DISTRICT EDUCATION OFFICER (M)  
SHANGLA

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### DISCIPLINARY ACTION

I, Muhammad Amin, District Education Officer (Male) Shangla as competent authority am of the opinion that Mr. Ghuncha Din, PSHT now reinstated for the purpose of denova enquiry has rendered himself liable to be proceeded against committed the following acts/omissions within the meaning of rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline ) Rules, 2011.

#### STATEMENT OF ALLEGATIONS

That he has been reported to have committed the following irregularities:

- a) Guilty of misconduct as per visit report of SDEO(M) Alpurai vide letter under Endst: No.806 dated:12/05/2015 along with statement of School PTC, school staff as well as the statement of an alternate teacher working in the school.
- b) Inefficiency as no proper record was maintained during utilization of huge amount of DFID/PTC Fund while carrying out the construction work in the concerned school.
- c) Habitual Absenteesm w.e.f 15/03/2013 to 23/04/2015(739 days) i.e 2 years and 09 days.
- d) Embezzlement of PTC Fund amounting to Rs.28000/- as per report of ASDEO(M) Circle Puran dated:09/10/2015.

For the purpose of enquiry against the said accused with reference to the above allegations, an enquiry committee consisting of the following is constituted under rule 10(l) (a) of the ibid rules to conduct proper inquiry under the E&D rules 2011 as per court judgment.

1. Mr. Sultan Sikandar, Head Master GHS Sheshan. (Chairman)
  2. Mr. Mirza Ali, Head Master GCMHS Alpurai (Member)
- Enquiry committee.

Competent authority.

DISTRICT EDUCATION OFFICER (M)

SHANGLA



# محترم جناب ڈسٹرکٹ ایجوکیشن افسر صاحب ضلع شانگلہ

Absenteesm کا جو دورانیہ (Period) بحوالہ چیئر مین PTC مورخہ 15.04.2013 تا

23.04.2015 دکھایا گیا ہے سراسر جھوٹا، من گھڑت اور لغو و بیہودہ بات ہے۔ از روئے ریکارڈ دفتر، DEO،

SDEO اور سکول ریکارڈ میں چیئر مین PTC کمیٹی عبدالظاہر نامی شخص ہے۔ جس کے تعیناتی پر، DEO،

SDEO صاحب کے دستخط مثبت ہیں اور دفتر DEO صاحب کے ریکارڈ پر موجود ہے۔ تم سے De movo انکوائری

مورخہ 18-05-12 ملے مہر عبدالظاہر کے ریکارڈ میں حل گئی ہے (دفتری ریکارڈ ملاحظہ فرمائیں)

جو کہ ریکارڈ میں Add میں کیا گیا ہے۔ لومٹ case میں نہیں تھا۔ جس پر

مہر عبدالظاہر کا دستخط اور مہر جمعہ مورخہ موجود ہو پیش کریں۔ وہ یعنی عبدالظاہر چیئر مین PTC خود بتاتا ہے کہ میں نے

SDEO اور نگزیب یادو سے کسی بھی افسر کو غنچہ دین H/T کے خلاف رپورٹ نہیں دیا ہے۔ چیئر مین عبدالظاہر کا

اس بارے ویڈیو بھی میرے پاس موجود ہے جس میں وہ صاف انکاری ہے۔ اگر چیئر مین عبدالظاہر PTC کا

رپورٹ میرے خلاف ریکارڈ پر موجود ہوتا تو Court case میں میرے خلاف پیش کیوں نہیں کیا گیا؟۔

یہاں یہ بات قابل ذکر و فکر ہے کہ میرے خلاف Court case میں ایک ایسے جعلی فرد جس کا نام

رحمت علی لکھا گیا ہے Statement پیش کیا گیا جس کا سکول ریکارڈ اور DEO صاحب کے دفتری ریکارڈ میں

نام و نشان تک نہیں ہے۔ اگر ہے تو پیش کریں؟

اس جعلی نام کو میں پہلے بھی کورٹ میں چیلنج کر چکا ہوں۔ لہذا Show cause notice میں دیا گیا

رحمت علی چیئر مین PTC کا رپورٹ بوگس اور جھوٹ کا پلندہ ثابت ہوا۔ جبکہ عبدالظاہر چیئر مین کا بیان لومٹ میں Add انکوائری

A denovo inquiry میں چیئر مین کمیٹی سلطان سکندر کے حکم کے باوجود مجھے اپنے Defince

کے لئے مکمل ریکارڈ سکول میرے Periiod کا نہیں دیا گیا جس کی روشنی میں مزید حقائق اور انکشافات افسران

بالا کے نوٹس میں لاتے۔ البتہ سکول ریکارڈ میں سب کچھ یعنی اصل دو چہرہ ہر مزدور کو تعمیری کام میں دیا گیا رقم ریکارڈ

پر موجود ہے۔ DEO صاحب اگر چاہے ریکارڈ طلب کر کے دیکھ سکتے ہیں۔ اس سے واضح ہوا کہ ASDEO

صاحب سرکل پورن نے اپنے انکوائری رپورٹ میں 9.10.2015 کو غیر ذمہ دارانہ بیان دیا ہے کہ Proper

record DFID/PTC موجود نہیں تھا۔ اگر اب موجود ہے تو اس وقت بھی موجود ہوتا۔ یہاں یہ بات قابل

توجہ اور غور ہے کہ چیئر مین PTC عبدالظاہر -/28000 روپے غبن کے Statement سے صاف انکاری

ہے اور کہتا ہے کہ مجھ سے تو ASDEO صاحب سرکل پورن نے نہیں پوچھا ہے۔ جبکہ ASDEO نے چیئر مین

کا حوالہ دیا تھا۔ مزید یہ کہ انکوائری افسر چیئر مین PTC عبدالظاہر سے -/28000 روپے غبن کے بارے میں

*Shahzad*  
12/5/18

تحریر ثبوت کیوں نہیں لیتے اور میر خلاف اس Huge amount کے غبن کو عدالت میں پیش کیوں نہیں (جاری)

(2)

کیا گیا؟

یہ کہ انکو آڑی 9.10.2015 سے مجھے Inform کیوں نہیں کیا گیا؟

یہ کہ تین سال تک -/28000 روپے کے غبن کا الزام لگانے کے باوجود کیوں چھپایا گیا؟

انکو آڑی 2015 کا مجھے موجودہ انکو آڑی کے دوران 12.4.2018 کو ملی ہے۔

یہ کہ اس انکو آڑی 9.10.2015 سے قبل چارج شیٹ Statement of alligations اور

Show cause notice کیوں نہیں دیا گیا؟

اس سے صاف ظاہر ہوا کہ انکو آڑی 9.10.2015 بوگس، من گھڑت، جعلی، فرضی، سازشی اور ٹوپی

ڈرامہ تھا۔ لہذا بغیر اصل ریکارڈ اور دوچرزدیکھے -/28000 روپے غبن کا الزام قرین انصاف نہیں ہے۔ مجھے تو

بیک جنبش قلم مکھن سے بال کی طرح نکال کر پھینک دیا گیا تھا۔ DFID/PTC وغیرہ مرمت کا طویل المدتی کام

اور میں نے ابھی کمپلیٹ بھی نہیں کیا تھا۔ سپروڈک باقی تھا کہ مجھے پورن سے اپوری سکول نمبر 2 کو ٹرانسفر کیا گیا اور

میرے ٹرانسفر کے 05 ماہ بعد چوری چھپکے انکو آڑی کی گئی جس کی کوئی قانونی حیثیت نہیں ہے۔

جناب عالی! یہ کہ میں نے باقاعدگی سے اپنی ڈیوٹی دی ہے جس کی ثبوت باقاعدہ School

attendance رجسٹر کی مصدقہ اور افسران بالا سے دستخط شدہ ریکارڈ کی کاپیاں ہیں۔

یہ کہ سکول میں Construction کا طویل المیعاد کام باؤنڈری وال، بجلی کا کام اور مرمت سکول کا کام

جاری تھا۔ اگر میں سکول میں باقاعدگی سے ڈیوٹی انجام نہ دیتا اور بقول چیئر مین PTC کمیٹی دو سال دس دن غیر

حاضر رہتا تو یہ مذکورہ طویل المدتی تعمیر کام کبھی بھی انجام نہ پاتا۔

یہ بھی واضح ہو کہ سابقہ SDO اور نگزیب صاحب کی مجھ سے معمولی بات یعنی (خوجہ سرا صاحب

کہنا) DFIE/PTC فنڈز میں -/60000 کمیشن نہ دینا جس کا بار بار P/D والے ڈیمانڈ کیا کرتے تھے نہ

دینا میرے خلاف سازشی کی بنیاد بن گئی اور SDEO صاحب طیش میں آ کر میرے باقاعدہ حاضر یوں کو

Cross کر دیا۔ حالانکہ سائیل کسی بے ضابطگی Miss conduct کا مرتکب نہیں ہوا۔

یہ کہ مذکورہ بالا 745 دن کی طویل المدت پیریڈ میں محکمے کے افسران صاحبان اور IMU کے کارندوں

نے باقاعدگی سے سکول کا وزٹ کیا ہے اور میں موجود تھا۔ سکول ”کوہ“ میں میرے پیریڈ میں ڈیوٹی کرتے ہوئے

جتنا DFID/PTC فنڈز کا کام ہوا ہے۔ اس کی باقاعدہ اور مکمل ریکارڈ موجود ہے اور لف ہے۔ لہذا سائیل

in efficiency کا مرتکب نہیں ہوا۔

Mueen Qureshi  
12/10/18

لاہور

جناب والا! چونکہ سکول میں باقاعدہ ڈیوٹی کر چکا ہوں۔ افسران بالا کی وزٹ، رجسٹر حاضری مدرسین (جاری)

(3)

اور لاگ بک میں افسران بالا کی مثبت شدہ دستخط اور سکول میں طویل المیعادی کام کی تکمیل اس بات کی واضح ثبوت نہیں ہیں کہ سائیل نے ڈیوٹی انجام دی ہے۔ اگر سائیل کو Absent considered کیا گیا تو تمام جاری شدہ اسناد اور باقی دستاویزات کی قانونی حیثیت ختم ہو سکتی ہے۔ جبکہ اب یہ طلبہ متعدد ہائی اداروں میں پڑھتے ہیں۔ جناب والا! PTC فنڈز میں کوئی غبن نہیں کی گئی ہے۔ تمام رقم خرچ کر کے باقاعدہ ریکارڈ رکھا اور سب کچھ اب بھی موقع پر موجود ہے جس کی زیر نظر انکوائری Physical verification بھی کر سکتے ہیں اور میں Well come کروں گا۔

حضور والا! بحیثیت ہیڈ ٹیچر GPS Koo میں نے اپنی دو سالہ پیریڈ میں اپنے Followers کو جو احکامات جاری کئے ہیں ریکارڈ پر موجود ہے۔ یعنی جتنے سینکڑوں نئے داخلے کئے، جتنے بیسیوں پنچم پاس طلبہ کو سرٹیفکیٹس Issue کئے ہیں۔ ADO P&D صاحب کا وزٹ اور تعمیری کام دیکھنا، ڈیمارکیشن On the spot پہنچا کر کرانا، دونوں سالوں 2014-15 میں سرکاری کتب سکول پہنچانا، فرنیچر، NGO سے طلبہ کے لئے کرسیاں اور میزیں سکول پہنچانا۔ 511000/- روپے فنڈز کا بہترین طریقہ سے Utilized کرانا کسی مائی کے لعل میں جرات نہیں ہے کہ میرے تعمیری کام پر انگلی اٹھائے اور خرید برد کا ایک پیسہ بھی ثابت کریں، PTC کمیٹی، افسران بالا سے Countersign کرانا، چیئر مین PTC کمیٹی اور معاون استاد کے تعاون سے قوم نکالنا اور Utilize کرانا اس بات کی واضح ثبوت ہے کہ میں ہمہ وقت سکول میں حاضر رہتا اور اپنے فرائض میں Interest تھا۔

میرے دو سالہ پیریڈ میں معاون استاد کا کسی بھی افیشلی کام، دستاویز پر دستخط تک نہیں ہے اگر ہے تو ثابت کریں۔ سب امور خود انجام دیے ہیں۔ یہ میرے ڈیوٹی کا منہ بولتا ثبوت ہے۔ جو کچھ میں نے لکھا ہے وہ درست ہے۔

جناب عالی! اگر پھر بھی شک ہو تو براہ کرم خود سکول آ کر حقائق دیکھ لے اور میرے ساتھ رحم کا سلوک کریں۔ میں نے جتنے بھی ثبوت دیے ہیں ایک ایک کر کے ان کی ذاتی معلومات کریں اگر کوئی کمی ہے تو وہ بھی بتادیں تاکہ میں اسے دور کروں۔ فقط۔

Amrha Qureshi  
12/5/18

العارض

آپ کا تابع فرمان غنچہ دین PST، گورنمنٹ پرائمری سکول چاگم نمبر 2 پورن ضلع شانگلہ

مورخہ 12.5.2018

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**SERVICE APPEAL No.1372/2018**

Ghuncha Din S/O Abdul Karim PSHT Government Primary School Chagam No.2 Puran District Shangla.  
(Appellant)

**VERSUS**

1. Director E& SE Department Khyber PakhtunKhwa Peshawar.
2. District Education Officer (M) District Shangla.
3. The District Accounts Officer District Shangla

(Respondents)

**JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS.**

**PRELIMINARY OBJECTIONS:-**

1. That the Appellant has no cause of action/locus standi.
2. That the Appellant has concealed the material facts from this Honorable Tribunal.
3. That the Appellant has not come to this Honorable Tribunal with clean hands.
4. That the Appellant has filed the instant appeal on mala fide motives.
5. That the appellant has been treated as per law, rules & policy.
6. That the instant service appeal is not maintainable in the present form.
7. That the instant service appeal is against the prevailing Law and Rules.
8. That the appellant has filed the instant appeal just to pressurize the respondents.

**RESPECTED SHEWETH:**

**FACTS.**

1. Correct to the extent of employment in department as PST but the appellant did not perform his duties efficiently and many times charges framed against him.
2. Correct, as mentioned above. Many times during the surprise visits he was found guilty by the officers, who reported against him. Hence the Respondent issued the order.
3. Correct, moreover the said judgment directed the department to hold donove proceedings within a stipulated period (90 days). The order of the August Service Tribunal was obeyed and a denovo proceeding was completed accordingly. The same para is reproduced as following.

*"The department is however, at liberty to hold denovo proceedings within a period of ninety days from the date of receipt of this judgment."*

(Office Order 4336-37 dated 3/3/2018 is attached as Annexure "A" and Denovo Enquiry is "A-1")

4. Incorrect and baseless, because the appellant was called / interviewed while following all the codal formalities as per rules, which is revealed from the Enquiry Report. (Copies of Office Order 9315 Dated 10/05/2018 and application of appellant is attached as is Annexure "B")
5. Incorrect proper Departmental Denovo enquiry was conducted and the appellant was recommended for imposition of penalty.
6. Correct to the extent of rejection order.
7. No need to comment.


**GROUNDS.**

- A. Incorrect because the proceedings were carried out as per E&D Rules. (Copies of Show Cause, Charge sheet along with Statement of allegations are attached as Annexures "C" & "D")
- B. Incorrect as mentioned above.
- C. Incorrect and baseless.
- D. Incorrect as already explained above.
- E. Incorrect because all codal formalities were followed during the process such as Charge Sheet, Show cause, personal hearing etc. (Copies of Office Letter No 272 and Reply of Show Cause is Annex "E" and "F" )
- F. Incorrect the appellant was given chance for personal hearing but he failed to justify his position.(Copy is attached as Annexure "G")
- G. Denovo Enquiry is conducted in compliance of this Honorable Service Tribunal as it is clear from the order.
- H. Incorrect.
- I. No need to comment.

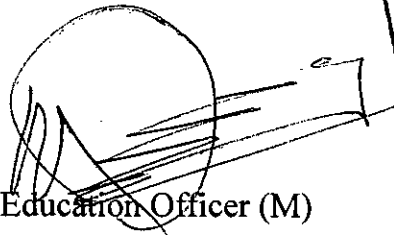
**PRAYER:**

In the view of the above comments it is very humbly prayed that the instant appeal may be rejected with heavy cost.

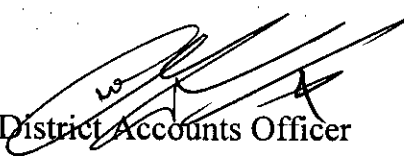
**Respondent No: 1**

  
Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

**Respondent No:2**

  
District Education Officer (M)  
District Shangla

**Respondent No:3**

  
District Accounts Officer  
District Shangla

*Noted subject to come to  
Amicus Affidavit*

*5/18/19*  
Deputy District Attorney  
Khyber Pakhtunkhwa  
Service Tribunal Peshawar