

10.12.2015

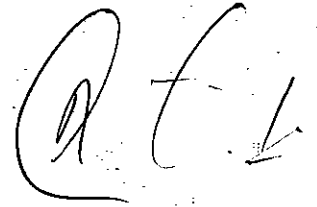
Appellant with counsel (Mr. Naveed Akhtar, Advocates) and Mr. Sultan Shah, Assistant alongwith Additional Advocate General for respondents present.

Vide our detailed Judgment of to-day in the connected service appeal No. 1597/2013 titled "Bashir Khan-vs-Govt: of Khyber Pakhtunkhwa through Chief Secretary Khyber Pakhtunkhwa, Peshawar and others", this appeal is also disposed of as per detailed judgment. Parties are left to bear their own costs. File be consigned to the record.

Announced  
10.12.2015



(PIR BAKHSH SHAH)  
MEMBER



(ABDUL LATIF)  
MEMBER

1543/13

9.06.2015

Appellant with counsel and Ziaullah, GP for the respondents present. Arguments partly heard. During the course of arguments, it transpired that enquiry report is not available on record, which is necessary for just decision of the case. Notice be issued to the respondents to produce the same on the next date. To come up for further arguments on 19.08.2015.

  
MEMBER

  
MEMBER

19.08.2015

Appellant with counsel and Addl: A.G for respondents present. Inquiry report was not produced by the respondent-department. Another notice be issued to respondent-department to produce the inquiry report on the next date of hearing. To come for further arguments on

08-10-2015

  
Member

08.10.2015

None present for appellant. Assistant A.G for respondents present. Due to non-availability of appellant and his counsel as well as incomplete Bench therefore, case is adjourned to 12-11-15 for arguments.

  
MEMBER

12.11.2015

Counsel for the appellant and Mr. Naheed, Senior Clerk alongwith Asst: AG for respondents present. Arguments could not be heard due to paucity of time. To come up for arguments on

10-12-2015

  
Member

  
Member

29.05.2014

Counsel for the appellant and Mr. Muhammad Jan, GP with Sultan Shah, Assistant for the respondents present and reply filed. To come up for rejoinder on 25.8.2014.

  
MEMBER

  
MEMBER

28.08.2014

Appellant with counsel and Mr. Muhammad Jan, GP with Sultan Shah, Assistant for the respondents present. Counsel for the appellant does not want to file rejoinder. To come up for arguments on 03.02.2015

  
MEMBER

3.2.2015

Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. Due to incomplete Bench, case is adjourned to 11.5.2015 for arguments.

  
MEMBER

16.04.2015

Counsel for the appellant and Addl. AG with Sultan Shah, Assistant for the respondents present. Due to rush of work, case is adjourned to 9.6.2015 for arguments.

  
MEMBER

  
MEMBER

Appeal No 1543/2013  
Mr. Jehanzeb

3. 29.1.2014

Counsel for the appellant present. Preliminary arguments heard and record perused. Through the instant appeal, the appellant has impugned order dated 29.8.2013 vide which the appellant was awarded major penalty of removal from service. Against the same impugned order, the appellant filed departmental appeal, which was turned down vide order dated 7.11.2013, hence the present appeal.

Appellant deposited  
Process fee & Security  
Rs. 200/- Bank Receipt  
attached with file

Since the matter required further consideration, hence admitted for regular hearing, subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply on 16.4.2014.

MEMBER

4. 29.1.2014

This case be put up before the Final Bench for further proceedings.

CHAIRMAN

16.4.2014

Appellant in person and Mr. Ziaullah, GP present.

Fresh notices be issued to the respondents. To come up for written reply on 29.5.2014.

MEMBER



MEMBER

Form-A

FORM OF ORDER SHEET

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

Case No. 1543/2013

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	26/11/2013	The appeal of Mr. Jehanzeb resubmitted today by Mr. Zia Ullah Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.   REGISTRAR
2	29-11-2013	This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>29-1-2014</u> .   CHAIRMAN


The appeal of Mr. Jehanzeb son of Sher Nawab received today i.e. on 20.11.2013 is incomplete on the following scores which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Appeal may be got signed by the appellant.
- 2- Copies of charge sheet, statement of allegations, show cause notice, enquiry reply and replies thereto are not attached with the appeal which may be placed on it.
- 3- Appeal may be page marked according to the index of the appeal.
- 4- Annexures of the appeal may be attested.
- 5- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1656 /S.T,

Dt. 20/11 /2013.

Mr. Ziaullah Khan adv. Pesh.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

As copies of charge sheet, statement of allegations, show cause notice, enquiry etc not available to petitioner therefore are not attached with appeal.

Resubmitted after compliance

 adv.

26/11/13

**BEFORE THE CHAIRMAN SERVICE**  
**TRIBUNAL KHYBER PUKHTOON**  
**KHAWA PESHAWAR.**

*Appeal no. 1543/13*  
JEHANZEB

**VERSUS**

**GOVERNMENT OF KPK**

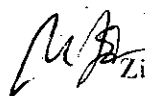
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7	SPARE COPIES FOR RESPONDANTS NO: 1 TO 4		

Dated: 20.11.2013

APPELLANT

Through



Zia Ullah Khan

&

Muhammad Imran Khan  
Advocate, High Court

2. That the appellant performed his job to the entire satisfaction of his Superior and during his 22 years service no adverse remark or black spot has been found on the part of appellant.
3. That to the astonishment of the appellant he received a letter No.SOE.IV(E&AD)10(237)2012 dated 29.08.2013 issued by Chief Secretary, Whereby the appellant was removed from service with immediate effect.

(Copy of the Order is attached as Annexure C)

4. That the appellant was too shocked that his 22 year service has been kicked out on mere allegations of his involvement in transfer of prisoners from Punjab to Khyber Pakhtoon Khwa. the appellant never involved in such type of activities as

2

**BEFORE THE CHAIRMAN, SERVICE**  
**TRIBUNAL KHYBER PUKHTOON**  
**KHAWA PESHAWAR.**

*Appeal no-1543/13*

JEHANZEB S/O SHER NAWAB, R/O: DHAGI JADEED P.O DHAGI  
BANDA TEHSIL & DISTRICT NOWSHERA.

APPELLANT

VERSUS

1. GOVERNMENT OF KPK THROUGH CHIEF SECRETARY SECRETARIAT PESHAWAR.
2. GOVERNMENT OF KHYBER PAKHTUNKHWA, THROUGH SECRETARY ADMINISTRATION, PESHAWAR
3. DEPUTY SECRETARY (ADMN) ADMINISTRATION DEPARTMENT PESHAWAR.
4. SECTION OFFICER (ADMN) ADMINISTRATION DEPARTMENT PESHAWAR.

RESPONDENTS

**APPEAL U/S: 4 OF THE NWFP SERVICE TRIBUNAL ACT,**  
**1974 AGAINST THE ORDER DATED 29.08.2013, WHEREBY**  
**THE ORDER OF REMOVAL FROM SERVICE HAS BEEN**  
**PASSED AGAINST THE APPELLANT.**

misconduct as enumerated in the Service Laws has been bulldozed in such a manner that without any solid proof the appellant has been removed in illegal manner.

- F. That not only the whole process and procedure of E&D Rules, 1973 as well as Removal from Service Ordinance, 2000 has been ignored and defied, but the



service of the appellant has been terminated in such a manner which can not be justified even under the law of jungle.

- G. That the appellant served the Department for 22 years and entitle for retirement and other benefits also but such a harsh and severe major punishment on mere allegation is against law, fact and natural justice.
- H. That the appellant is the only serving member of huge family and such harsh punishment of dismissal from the service not only put him in so many mental worries, financial crises but also spoiled his career in a very bad way.
- I. That there is a basic principle of Islam as well as of law that no one should be condemned unheard but such rule has been ruined out by passing one sided Order.
- J. That other grounds if any will be raised at the time of arguments with prior permission of this Honorable Court.

**IT IS, THEREFORE, PRAYED THAT ON ACCEPTANCE OF THIS APPEAL THE ORDER DATED 29.08.2013, WHEREBY THE SERVICE OF THE APPELLANT HAS BEEN DISMISSED BEING ILLEGAL, UNLAWFUL WITHOUT AUTHORITY/JURISDICTION AS WELL AS BEING UNCONSTITUTIONAL AND BASED ON THE MALAFIDE INTENTIONS OF THE DEPARTMENT MAY PLEASE BE SET-ASIDE AND THE APPELLANT BE RE-INSTATED BACK TO HIS SERVICE WITH ALL HIS BACK BENEFITS FROM THE DATE OF HIS ABOVE SAID REMOVAL.**

*21*  
Appellant

Dated: 20.11.13

Through

*MZ*  
Muhammad Zia Ullah  
Muhammad Imran Khan  
Advocates, High Court,  
Peshawar.

**BEFORE THE CHAIRMAN SERVICE**  
**TRIBUNAL KHYBER PUKHTOON**  
**KHAWA PESHAWAR.**

JEHANZEB

VERSUS

GOVERNMENT OF KPK THROUGH CHIEF SECRETARY

**AFFIDAVIT**

It is verified upon oath that the contents of this appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

  
Deponent

Annexure A

(8)

GOVERNMENT OF NWFP  
GENERAL ADMINISTRATION DEPARTMENT.  
(GENERAL WING):

DATED PESHAWAR THE 23.10/19 91.

ORDER.

NO. F&A (S&GAD) 4(1) 80. Mr. Jehanzeb S/O Sher Nawab of Dagai

Upn & Distt Nowshera is hereby appointed as Cleaner

in BPS-1 (Rs. 920-26-131) against an existing vacancy/XXXXX

~~from the date of his arrival.~~

His appointment in the Distt Secretariat is purely on temporary basis and subject to the following conditions:-

His services are liable to be terminated without assigning any reason. If he wishes to resign from service, 15 days's advance notice will be necessary or in lieu thereof 15-days's pay shall be deposited.

He will be governed by such rules and orders relating to leave, T.A, Medical Allowance, Pay etc; as applicable to Government servants of the same categories as may be issued by the Government from time to time.

He will produce medical fitness certificate from Civil Surgeon Peshawar.

He should report to PWD within 7-days, otherwise he would be deemed to have accepted the offer.

DEPUTY SECRETARY (ADMINISTRATION)  
GENERAL ADMINISTRATION DEPTT.

Dated Peshawar the 23.10/19 91.

Copy furnished to:-

1. Accountant General, NWFP, Peshawar
2. Bill Clerk (S&GAD)
3. P/File of the official concerned.
4. Official concerned.
5. Technical Officer, S&GAD.

(POSH UL AMIN)  
SECTION OFFICER (GENERAL) S&GAD.

Attested as true copy of  
Original

M A

Usman / ...  
30.10.1991

Annexure (B)

Annexure B

7

Prepared by  
Habib Bank Limited  
Computer Division

PERSONNEL NO.	NAME	CADRE/DESIGNATION	GRADE	MINISTRY*	STATUS	IDCARD-NUMBER	DIVISION	CASH-LOC	DEPART
1870010	JOMAN ZEB S/ 12/5 SHER KANAD	2019/CLEANER	B-01		P	18889000273			S & G A
<b>EARNINGS</b>		<b>DEDUCTIONS</b>		<b>AMOUNT</b>		<b>FUND/PLI ACCOUNT NO.</b>	<b>INSTALMENT</b>	<b>BALANCE</b>	
001-SUBSTANTIVE PAY		12-1503 PROV FUND (S A)		29.00		4 GA	0013889	25.00	300.00
131-CONVEYANCE ALLOWANCE		281-BENEVOLENT FUND		10.00					
134-HOUSE ALLOWANCE									
137-WASHING ALLOWANCE									
141-CONTINGENT ALLOWANCE									
136-MEDICAL ALLOWANCE									
163-SECURITARIAT ALLOWANCE									
149-KIT-UNIFORM ALLOWANCE									
<b>GROSS EARNINGS</b>		<b>TOTAL DEDUCTIONS</b>		<b>35.00</b>		<b>BANK ACCOUNT DETAILS</b>			
						00 0000			

Adjusted  
original

Annexure B2

PAY ROLL MONTH- MARCH, 1993  
 DEPARTMENT A/C CODES 01302001/0311/2

G (N W F P)

PESHAWAR PAY ROLL  
 PAY ROLL REGISTER

DEPARTMENT--S & G A D

Pho.  
 RUI.

Annexure B2

PERSONNEL NO.	NAME	CADER DESIGNATION	GRADE	STATUS	IDCARD-NO	DIVISION	CASH-LOC	DEP
1609912	JEHAN ZEB S/W/O/S MIER NAJAB	0019/CLEANER	5-01	P	13889000273			S & G A
EARNINGS		DEDUCTIONS		AMOUNT	FUND/PLI ACCOUNT NO.	INSTALMENT	BALANCE	
001-SUBSTANTIVE PAY		02 -1503 PROV FUND (S A)		35.00	4 GA	0013889	35.00	477.00
131-CONVEYANCE ALLOWANCE		381-BENEVOLENT FUND		10.00				
134-HOUSE ALLOWANCE								
137-WASHING ALLOWANCE								
141-COMPENSATRY ALLOWANCE								
136-MEDICAL ALLOWANCE								
163-SECRETARIAT ALLOWANCE								
143-KIT-UNIFORM ALLOWANCE								
GROSS EINGS		TOTAL DEDUCTIONS		45.00	BANK ACCOUNT DETAILS			
1918.60					00 0000			

Attested as true  
 Copy of  
 Original

Prepared by  
 Habib Bank Limited  
 Computer Division

GOVERNMENT OF PAKISTAN  
 ACCOUNTANT GENERAL PESHAWAR PAKHTUNKHWA  
 DISTRICT  
 PAY ROLL SYSTEM  
 Buckle: 0

Annexure B3

9

P Sec: 008 PAYMENT ADVISE 2011  
 PR4127 - S.D.G HIGHER EDUCATION ARC  
 Min: Min. Of K.A & N.A & S.F.R

NTN:  
 GPF #: GA 013889  
 Old #:

DEPTT CODE

Allowance 45%	6,000.00
Allowance 2005	1,588.00
Allowance	920.00
Personal allowance	1,000.00
Allowance	350.00
Relief All(2005)	600.00
Relief (2005)	420.00
Allowance (2006)	420.00
Allowances	517.00
	17,215.00

Subrc: 320.00

39,992.00

NET AMOUNT PAYABLE

16,895.00

DATE	08.06.1972	LEP Quota:	NBP, CIVIL SECRETARIAT
MONTHS	008 Days		2041-9

Annexure B3

GOVERNMENT OF PAKISTAN  
 ACCOUNTANT GENERAL PESHAWAR PAKHTUNKHWA  
 DISTRICT  
 PAY ROLL SYSTEM  
 Buckle: 0

P Sec: 008 PAYMENT ADVISE 2011  
 PR4127 - S.D.G HIGHER EDUCATION  
 Min: Min. Of K.A & N.A & S.F.R

Name: JERANZEB  
 Dsg.: JUNIOR CLERK  
 NIC No.: 13392000273  
 GPF Interest Applied  
 07 Active Permanent

NTN:  
 GPF #: GA 013889  
 Old #:

DEPTT CODE

PAID AND ALLOWANCES:	
1975-Special Allowance 20%	1,200.00
1908-Adhoc Relief-2009 (01-16)	1,200.00
1948-Adhoc Allowance 2010@ 50%	3,000.00
Gross Pay and Allowances	17,215.00
DEDUCTIONS	
GPF Balance	39,992.00
Total Deductions	320.00
NET AMOUNT PAYABLE	16,895.00

Subrc:

QUALIFYING SERVICE  
 08.06.1972  
 08 Months 008 Days

LEP Quota:  
 NBP, CIVIL SECRETARIAT  
 2041-9

Attested as true copy of original  
 M J



GOVERNMENT OF PAKISTAN  
ACCOUNTANT GENERAL PAKISTAN REVENUE  
PESHAWAR AGPR (SO) PESH  
PAY ROLL SYSTEM

Annexure B4

PAYMENT ADVICE

10

Pers No: 00083945 Buckle: 0  
Name: JEHANZEB KHAN  
Dsg: SENIOR CLERK  
CNIS No: 1389200027300

F. Sec: 002 Month: July 2013  
PR0247 - FCR TRIBUNAL FATA PESHAWA  
Min. Of K.A & N.A & S.F.R  
Min. 0  
GPF #: GA 113889  
CNIS #: 1389200027300

BPS Interest Applied  
09 Active Permanent

DEPTT CODE 250047

PAYS AND ALLOWANCES

0001-Basic Pay		11,140.00
1001-House Rent Allowance- 45%		1,719.00
1210-Convey Allowance 200%		1,840.00
1300-Medical Allowance		1,000.00
1513-Deputation Allowance		3,228.00
1948-Adhoc Allowance 20100 50%		3,000.00
1966-Special Allowance 50%		1,800.00
1970-Adhoc Relief Allowance		800.00
2118-Adhoc Relief Allowance		800.00
Grand Total and Allowances		26,767.00

DEDUCTIONS

GPF Balance		491.00
6505-JFR Loan Principal Instal	bal: 47,800.00	1,800.00
3701-Benevolent Fund(Exchange)		180.00
3704-Group Insurance(Exchange)		52.00
3711-Addl Group Insurance(Lich)		7.00

Total Deductions

NET AMOUNT PAYABLE 24,320.00

QUALIFYING SERVICE  
YRS MON  
21 Years 09 Months 09 Days

D.O.B  
08.06.1972

LFP Quota:  
NATIONAL BANK LTD CIVIL SECTT. PESHAWAR  
2041-9

Attested as true copy  
of original  
MOR



(11)

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(ESTABLISHMENT WING)**

Dated Peshawar, the 29.08.2013

**ORDER.**

**No. SOE.IV(E&AD) 10(237)/2012**

WHEREAS, Mr. Jehanzeb, the then Junior Clerk (BS-07), Home & T.As Department, now Senior Clerk (BS-09), posted in FCR Tribunal, FATA Secretariat was proceeded against under Khyber Pakhtunkhwa Govt. Servants (Efficiency & Discipline) Rules, 2011 for the charges contained in charge sheet dated 14.02.2013.

AND WHEREAS, Mr. Adil Saeed Safi, Deputy Secretary, Home & T.As Department was appointed as inquiry official to conduct inquiry against the said official for the charges leveled against him, in accordance with the rules.

AND WHEREAS, the inquiry officer, after having examined the charges, evidence on record and explanation of the accused official, submitted report.

AND WHEREAS, a show cause notice was served upon the accused official to which he replied:

AND WHEREAS, opportunity of personal hearing was also afforded to the accused official.

NOW, THEREFORE, I, Muhammad Shahzad Arbab, Chief Secretary, Khyber Pakhtunkhwa as Competent Authority, after having considered the charges, evidence on record, explanation of the accused official during the enquiry, findings of the inquiry officer, reply of the accuse official to the show cause notice, defense offered by the accused official during personal hearing and in exercise of the powers conferred upon me under Rule 14 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 do hereby impose the major penalty of "Removal from Service" on Mr. Jehanzeb, the then Junior Clerk (BS-07), Home & T.As Department, now Senior Clerk (BS-09), posted in FCR Tribunal, FATA Secretariat with immediate effect.

**CHIEF SECRETARY,  
KHYBER PAKHTUNKHWA**

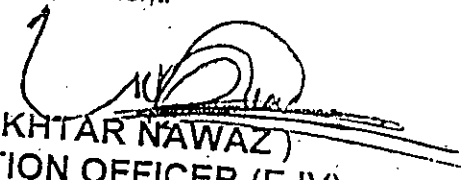
**Endst. No. & Date Even.**

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. The Chairman, FCR Tribunal, FATA Secretariat.
3. Section Officer (General), Home & T.As Department.
4. Section Officer (Secret), Establishment Department.
5. PS to Chief Secretary, Khyber Pakhtunkhwa.
6. PS to Secretary Establishment.
7. PS to Spl: Secretary (E), Establishment Department.
8. P.A to Addl: Secretary (E), Establishment Department.
9. Official concerned.
10. Personal file of the official concerned.

*Attested as true  
of original*

*MOR*

  
**( AKHTAR NAWAZ )  
SECTION OFFICER (E.IV)**



TO,

THE CHIEF MINISTER, KHYBER PAKHTUNKHWA,  
PESHAWAR.

**SUBJECT: DEPARTMENTAL APPEAL AGAINST THE REMOVAL ORDER DATED: 29.08.2013 WHEREBY THE APPELLANT HAS BEEN REMOVED FROM SERVICE.**

**Respected Sir:**

With due honor and respect I submit the Departmental Appeal on following reasons and grounds:

1. That the appellant was appointed as Cleaner in the Transport section of Establishment(S&GAD) Department on dated 24/10/1991 .
2. That the appellant performed his job to the entire satisfaction of his Superior and during his 22 years service no adverse remark or black spot has been found on the part of appellant.
3. That to the astonishment of the appellant he received a letter No.SOE.IV(E&AD)10(237)2012 dated 29.08.2013 issued by Chief Secretary, Whereby the appellant was removed from service.

(Copy of the Order is attached)

4. That the appellant was too shocked that his 22 year service has been kicked out on mere allegations of his involvement in transfer of prisoners from Punjab to Khyber PakhtoonKhwa, the appellant never involved in such type of activities as the appellant is simple clerk and has nothing to do with any other activity whatsoever, it may be as alleged against him.
5. That the applicant seeks no way, most humbly submits his departmental appeal for consideration on the following grounds:

Attested as true copy  
of original

**8  
GROUNDS:-**

- A. That the appellant is a poor CLERK interested in his duties he has never been indulged even in any other activities.
- B. That the appellant only spent one year in the Prison Section (2010-2011) and during that period he performed his duties as junior clerk, and then on dated 11/02/2011 the appellant was transferred to IPC (Inter Provincial Coordination) Department during the entire period appellant was not in the knowledge of transfer of prisoners from Punjab to Khyber Pakhtunkhwa nor appellant had any concern with such transfer. And in the presence of responsible officials how the appellant can dare to do so.
- C. That no codal formalities as enumerated in the concerned laws have been adopted nor has any procedure as prescribed in the legal manner been obeyed by the competent authority.
- D. That no impartial enquiry has been conducted, nor any final show cause notice is available on the record before passing the above of removal against the appellant nor any proper opportunity of personal hearing has been providing to the appellant.
- E. That such an attitude of hire and fire is not even warranted by any law in the institution where a simple master and servant rule is applicable, whereas the misconduct as enumerated in the Service Laws has been bulldozed in such a manner that without any solid proof the appellant has been removed in illegal manner.
- F. That not only the whole process of Khyber Pakhtunkhwa, civil servant (E&D) Rules, 2011 has been ignored and defied, but the service of the appellant has been terminated in such a manner which cannot be justified even under the law of jungle.
- G. That the appellant served the Department for 22 years and is entitle for retirement and other benefits also but such a harsh and severe major punishment on mere allegation is against law, fact and natural justice.
- H. That the appellant is the only serving member of huge family and such harsh punishment of removal from the service not only put him in so many mental worries, financial crises but also spoiled his career in a very bad way.
- I. That there is a basic principle law that no one should be condemned unheard but such rule has been ruined out by passing one sided Order.

*Attested as  
true copy of original*

*M D*

IT IS, THEREFORE, PRAYED THAT ON ACCEPTANCE OF THIS APPEAL THE ORDER DATED 29.08.2013, WHEREBY THE SERVICE OF THE APPELLANT HAS BEEN REMOVED BEING ILLEGAL, UNLAWFUL, WITHOUT AUTHORITY/JURISDICTION AS WELL AS BEING UN-CONSTITUTIONAL AND BASED ON THE MALAFIDE INTENTIONS OF THE DEPARTMENT MAY PLEASE BE SET-ASIDE AND THE APPELLANT BE RE-INSTATED BACK TO HIS SERVICE WITH ALL HIS BACK BENEFITS FROM THE DATE OF HIS ABOVE SAID REMOVAL.

*Jehanzeb*  
29/8/2013  
Appellant

JEHANZEB S/O SHER NAWAB  
R/O DHAGI JADEED P.O DHAGI BANDA  
TEHSIL & DISTRICT NOWSHERA  
Mob No:- 0311-9166930

*Attached is true  
copy of original  
MJE*



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ESTABLISHMENT DEPARTMENT  
(ESTABLISHMENT WING)

No. SOE.IV (E&AD)10 (237)/2012/Vol.II.  
Dated Peshawar the 07.11.2013.

To

Mr. Jehanzeb S/o Sher Nawab,  
R/o Dhagi Jadeed P.O Dhagi Banda,  
Tehsil & District, Nowshera.

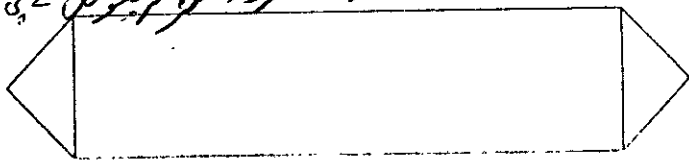
Subject: - DEPARTMENTAL APPEAL AGAINST THE REMOVAL ORDER  
DATED 29.08.2018 WHEREBY THE APPELLANT HAS BEEN  
REMOVED FROM SERVICE.

I am directed to refer to your appeal dated 29.08.2013 on the subject noted above and to inform you that your appeal has been processed and rejected by the appellate authority, i.e Chief Minister, Khyber Pakhtunkhwa.

  
( AKHTAR NAWAZ )  
SECTION OFFICER (E.IV)

Attended as  
true copy of  
original

MQ



مورخہ  
مقدمہ  
دعویٰ  
جرم

2 جناب  
بجائزیت بنام گورنمنٹ آف پنجاب

(Service Appeal)

### باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام سیتارہ کیلئے محمد ضیاء اللہ و عمران خان ایڈووکیٹس ریشاد  
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زر میں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا۔ از بصورت ضرورت  
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے  
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے  
سبب سے وہوگا کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں  
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المرقوم 20  
ماہ نومبر 20

العبد گواہ العبد

مقام سیتارہ کے لئے منظور ہے۔