

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

Service Appeal No. 163/2016

Date of Institution... 22.02.2016  
Date of decision... 22.12.2017

Miss Sony D/O Basweer Gul R/O Mohallah Pir Gulab Shah, Inside Hashtnagri,  
Peshawar, Ex-Family Welfare Worker (FWW) Population Welfare Department,  
Peshawar. ... (Appellant)

Versus

1. Secretary to Government of Khyber Pakhtunkhwa, Population Welfare  
Department, Peshawar and two others. ... (Respondents)

Mr. Muhammad Usman Torlandi, ... For appellant.  
Advocate.

MR. Mr. Muhammad Jan, ... For respondents.  
Deputy District Attorney

MR. NIAZ MUHAMMAD KHAN, ... CHAIRMAN  
MR. MUHAMMAD HAMID MUGHAL, ... MEMBER

JUDGMENT

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

FACTS

2. The appellant was terminated on 24.11.2015 on the ground of submission of  
fake and bogus certificates of SSC and B.A. Against this order she filed  
departmental appeal on 22.12.2015 which was rejected on 28.1.2016 and thereafter  
she filed the present service appeal on 22.02.2016.

ARGUMENTS

3. The learned counsel for the appellant argued that the basic qualification as  
advertised for the post was matriculation alongwith other professional/technical  
qualifications. That the appellant submitted the genuine certificates of Matriculation

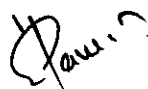
and Intermediate. That no certificate of B.A was submitted by the appellant alongwith application. That the concerned BISE reported about the alleged tampering of marks as changed from 553 to 653. That the appellant submitted a certificate of SSC in which the marks were 553. That it was not known to the appellant that who tampered with the marks. That the appellant was also not in the knowledge that who submitted her B.A certificate alongwith application. That the proceedings took-place without any notice to the appellant. That it was the right of the appellant to have, at least, been given the notice.

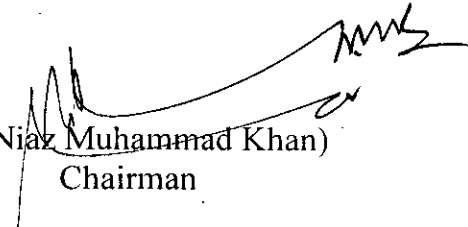
4. On the other hand the learned Deputy District Attorney argued that the appellant was on probation and under Section 11 of the Khyber Pakhtunkhwa Civil Servant Act, 1973, there was no need of any notice. That view of judgment reported as 2005-SCMR-1440 when appointment order of a person was fake then that person would not fall within the definition of civil servants and this Tribunal would not have the jurisdiction.

### CONCLUSION

5. Regarding the objection of the learned DDA about the status of the appellant, the reported judgment relied upon by him is not relevant as in that reported judgment the appointment letter was fake. Non service of notice to probationer under Section 11 of the Khyber Pakhtunkhwa Civil Servant Act, 1973 has also been discussion by this Tribunal in a number of cases based on the judgment reported as 1981-SCMR-523 that when some stigma is attributed to probationer service of notice is must. In the instant case stigma of forgery is attributed to the appellant, therefore, service of notice is must to probationer. Admittedly no notice was given to the appellant nor regular enquiry was conducted which was must as discussed above.

6. Consequently, the present appeal is accepted and the department is directed to hold denovo enquiry within a period of 90 days from the date of receipt of this judgment, failing which the appellant shall be reinstated in service. The issue of back benefits etc. shall be subject to final outcome of denovo proceedings. Parties are left to bear their own costs. File be consigned to the record room.

  
(Muhammad Hamid Mughal)  
Member

  
(Niaz Muhammad Khan)  
Chairman

ANNOUNCED

22.12.2017

21.07.2017

Counsel for the appellant present. Mr. Sahgeer Musharaf, AD alongwith Mr. Ziaullah, Deputy District Attorney for the respondents also present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 20.09.2017 before D.B.

(Gul Zeb Khan)  
Member

(Muhammad Amin Khan Kundi)  
Member

20.09.2017

Husband of the appellant present. Learned Deputy District Attorney for the respondents present. Husband of the appellant seeks adjournment on the ground that learned for appellant is not available today. Adjourned. To come up for arguments on 22.12.2017 before D.B.

Member  
(Executive)

Member  
(Judicial)

22.12.2017

Counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney alongwith Saghir Musharaf, AD for the respondents present. Arguments heard and record perused.

This appeal is accepted as per our detailed judgment of today. Parties are left to bear their own costs. File be consigned to the record room.

Member

Chairman

ANNOUNCED  
22.12.2017

28.07.2016

Clerk of counsel for the appellant and Mr. Arif Abbas, Asstt. alongwith Addl. AG for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 23.11.2016.

  
Chairman

23.11.2016

Clerk to counsel for the appellant and Mr. Sagheer Musharraf alongwith Additional AG for the respondents present. Rejoinder on behalf of the appellant submitted, copy whereof handed over to learned Additional AG. To come up for arguments on 4.4.17 before D.B.

  
(ABDUL LATIF)  
MEMBER

  
(MUHAMMAD AAMIR NAZIR)  
MEMBER

04.04.2017

Appellant with counsel and Mr. Adeel Butt, Addl. AG for the respondents present. Argument could not be heard due to incomplete bench. To come up for final hearing on 21.07.2017 before D.B.

  
Chairman



01.03.2016

Appellant Deposited  
Security & Process Fee

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as Family Welfare Worker (BPS-8) after fulfilling the prescribed codal formalities vide appointment order dated 10.6.2015. That her services were terminated vide impugned order dated 24.11.2015 on the allegations of submission of fake Secondary School Certificate where-against she preferred departmental appeal on 21.12.2015 which was rejected on 28.1.2016 and hence the instant service appeal on 22.2.2016.

That the certificate of the appellant is genuine and that no opportunity of hearing was afforded to the appellant in the prescribed manners and as such the impugned order is a nullity in the eye of law.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 13.4.2016 before S.B.

  
Chairman

13.4.2016

Husband of thje appellant and Asstt. AG for the respondents present. Requested for adjournment. Requested for adjournment. To come up for written reply/comments on 01.06.2016 before S.B.

  
Chairman

01.06.2016



Counsel for the appellant and Mr. Saghir Musharaf, AD alongwith Addl AG for the respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come upfor written reply/comments on 28.07.2016 before S.B.

  
Chairman

Form- A  
FORM OF ORDER SHEET

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

Case No. 163 /2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	23.02.2016	<p>The appeal of Miss. Sony resubmitted today by Mr. Muhammad Usman Khan Turlandi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	28-2-2016	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>01-03-2016</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Miss. Sony d/o Basweer Gul Ex-Family Welfare Worker Population Welfare Department received to-day i.e. on 22.02.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Address of respondent No.1 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.

No. 300 /S.T.

Dt. 22-2 /2016

*Amatills*  
for REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Usman Khan/Adv. Pesh.

22-2-2016.

Re-submitted after proper completion  
at directed/desired above.

*Amatills*  
Advocate

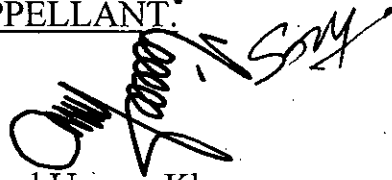


**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL****PESHAWAR.**In Ref; to S. Appeal No. 163 of 2016.**Miss Sony.....Versus.....Secretary Population & others.****I N D E X**

<u>S.No</u>	<u>DESCRIPTION OF DOCUMENTS</u>	<u>ANNEX</u>	<u>P.No</u>
1.	Main Appeal.		1-8
2.	Affidavit.		8
3.	Addresses of Parties.		9
4.	Advertisement.	"A"	10
5.	Copy of Metric /Educational/Experience Certificates.	"B"	11-24
6.	Copy of the Call Letter.	"C"	25
7.	Copy of the Appointment Order.	"D"	26
8.	Copy of the Arrival Report/Posting Order.	"E"	27
9.	Copy of the Letter of Inquiry Proceedings.	"F"	28
10.	Copy of the Open Inquiry by the C.O-ACE Peshawar.	"G"	29
11.	Copy of the Termination Order.	"H"	30
12.	Copy of the Departmental Appeal.	"I"	31-33
13.	Copy of the final Impugned Order dated 28/01/2016.	"J"	34
14.	Vokatnama in original.		35

**APPELLANT.**

Through



Muhammad Usman Khan  
Turlandi  
Advocate Peshawar.

Dated: 22/02/2016

Jehan Afsar Khan Paindakhel  
Advocate Peshawar.

(2)

**BEFORE THE Khyber Pakhtunkhwa SERVICE TRIBUNAL**  
**PESHAWAR.**

In Ref; to S. Appeal No. 163 of 2016.

K.P.K. Service Tribunal  
Diary No. 129  
Dated 22/02/2016

Miss Sony D/O Basweer Gul R/O Mohallah: Pir Gulab Shah, inside Hashtnagri, Tehsil and District Peshawar , Ex-Family Welfare Worker (FWW), Population Welfare Department KPK Peshawar and lastly was posted as FWW (BPS-8) at FW Centre Rano Gari, Peshawar.

.....**APPELLANT.**

**VERSUS**

*Population Welfare Department*

- 1) Secretary to the Government of Khyber Pakhtunkhwa, 102<sup>nd</sup> Floor, Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar.
- 2) Director General, Population Welfare Department, Khyber Pakhtunkhwa, FC Trust Building, Sunehri Masjid Road Peshawar Cantt: Peshawar.
- 3) District Population Welfare Officer, Peshawar, Building No. 5 Qafila Road, Tehkal Payan Peshawar.....**RESPONDENTS.**

**Appeal u/s 4 of the KPK Service Tribunal Act, against the impugned order passed by the respondent No. 1, endorsed by the respondent No. 3, vide office order f. No. 1(27) 2016/Admn: dated 28-01-2016 whereby the departmental appeal for reinstatement of the appellant in service was regretted.**

Filed to the  
Registrar  
23/2/16

**PRAYERS:-**

On acceptance of this appeal the impugned orders dated 31-12-2015 passed by the respondent No. 1 and endorsed by the respondent No. 3 dated 28-01-2016 whereby the departmental appeal of the appellant for reinstatement in service was regretted, may be set-aside and the appellant may be reinstated in service with all back benefits, allied allowances and seniority please.

so-submitted to-  
and filed;  
Registrar  
23/2/16

**RESPECTFULLY SHEWETH:-**

1. That the appellant belongs to a respectable family of Mohallah: Pir Gulab Shah, inside Hashtnagri, Tehsil and District Peshawar and being highly eligible, having the requisite qualification, had joined the services as Family Welfare Worker (FWW), Population Welfare Department KPK Peshawar and lastly was posted as FWW (BPS-8) at FW Centre Rano Gari, Peshawar and since her appointment and first arrival on duty dated 24-06-2015, She was working with great zeal, zest and enthusiasm.
2. Those as per the brief facts of the case leading to the instant appeal are that the advertisements bearing No. and No. INF (P) 53 dated 06-01-2016 given by the Respondent No. 2, published in the daily news paper "Mashriq" requiring responsibilities for some 44 vacant posts of Family Welfare Workers (BPS-8) with certain qualification and experience. (Copy of the advertisement is annexure "A").
3. That in response to the said advertisement, the appellant being highly eligible and as per given/required criteria was duly qualified having requisite experience, applied for the post of FWW and was properly called upon for interview vide office order passed by the respondent No. 2 dated 10<sup>th</sup> April, 2015. (Copies of the Matric Certificate, FA, PTC, Two years Ultrasound Diploma, Nursing Diploma and other allied/relevant Certificates/Diploma in different courses viz-a-viz health care arranged by different NGOs and Call Letter for interviews are annexure "B" & "C" respectively).
4. That thereafter, the appellant was appointed through a well transparent manner in accordance with the prescribed method of recruitment and thus the appellant assumed her duty and submitted her arrival report accordingly whereas she regularly attended her duty station punctually and no adverse remarks whatsoever has ever been assigned to her from any quarter. (Copy of the appointment order and arrival report/posting order of the appellant is annexure "D" & "E" respectively).

(4)

5. That needless to say that prior to the advertisement supra, another advertisement bearing No. INF(P)51 dated 04-01-2015 published in the daily news paper "Mashriq" given by the Project Director Population Welfare Khyber Pakhtunkhwa, FC Trust Plaza Peshawar requiring responsibilities for some 100 vacant posts of Family Welfare Workers (BPS-8) with certain qualification and experience whereas the appellant had also submitted an application for the post of FWW coupled with the one and the same set of documents and the appellant had also participated in that Test/interview.
6. That the appellant while duly appointed and posted as FWW, assumed her charge, served the department for almost more than six months with great zeal, zest and enthusiasm, surprised to get a letter regarding Inquiry Proceedings initiated against the appellant in the office of the Respondent No. 1. (Copy of the Letter of Inquiry proceedings is annexure "F").
7. That another letter was also sent by the Circle Officer, Police Station Anti-Corruption Peshawar handed over to the appellant regarding an open enquiry in a complaint of some forged educational Certificates. (Copy of the letter of open inquiry by the C.O Anti corruption Peshawar as Annexure "G").
8. That thereafter the appellant again surprised to get the first impugned order passed by the respondent No. 2 dated 24/11/2015 whereby the services of the appellant were terminated with retrospective effect i.e from the date of appointment (10/06/2015) on the pretext of forged metric and BA certificate produced by the appellant at the time of her appointment as FWW. (copy of the termination orders passed by the respondent No. 2 dated 24/11/2015 is Annexure "H").
9. That the appellant while aggrieved of the colorful authority and pick and choose policy observed by the respondent No. 1 submitted her departmental representation on 22-12-2015 before the respondent NO. 1 for the exoneration of the appellant from the baseless charges and her

reinstatement in service. (Copy of the departmental representation is Annexure "I").

10. That admittedly, no inquiry whatsoever has ever been conducted in the instant case and astonishingly no show case notice either preliminarily or final has been served upon the appellant and even the respondents have never bothered to bestow an opportunity of personal hearing to the appellant and with a single stroke of pen dismissed/rejected the departmental appeal in a hap-hazard manner. (Copy of the final impugned order passed by the respondent No. 1 dated 31/12/2015, endorsed by the respondent No. 3 dated 28/01/2016 and communicated/handed over to the appellant on 01/02/2016 is Annexure "J").

11. That the appellant while aggrieved of the final impugned order and having no other adequate remedy available to her in the circumstances of the case, approaches this august Tribunal on the following amongst other grounds inter-alia.

**GROUND S:-**

- a) That the impugned order is against the facts, circumstances and law on the subject.
- b) That impugned order has been passed according to the wish and whims of the respondents with the active connivance of ill-wishers on the basis of political victimization.
- c) That the appellant was appointed through a well transparent manner in light of advertisement in the newspaper of wide circulation and after going through the required the criteria/process lead down in the form of test and interview conducted by the selection committee in accordance with the prescribed method of recruitment of a civil servant.
- d) That as per advertisement if seen at a glance, the required educational qualification for the post of FWW is/was metric and nothing more where as the appellant has passed her matriculation examination in the session Annual 2005 by obtaining 553 marks out of 1050 and has been placed in Grad C and the appellant has also done her education up to FA in the session supply 2007 by obtaining 676 marks out of 1100. The appellant has

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procaverd her job on the basis of the educational qualification mentioned above coupled with the other allied/relevant technical qualification in terms of LHV diploma, 2 years ultrasound diploma and other different course viz-a-viz health care arranged by different NGOs wherein there is no fake certificate/diploma.

- e) That the allegations of fake documents or exercising fraud or cheating/manipulating over there are false, fabricated, baseless and incorrect hence all such allegations' are denied. As per appended Metric certificate, which transparently transpires that the appellatant has obtained 553 marks which was/is sufficient to get the job of FWW then what was the necessity/logic to enhance/increase the marks from 553 to 653 fraudulently and to convert the original/valid document into forged one.
- f) That the appellatant neither produced any such fake, bogus, manipulated, tempered certificate showing therein her marks increase from 553 to 653 and similarly no fake bogus certificate of BA/Graduation has been tendered by the appellatant at the time of her appointment as the appellatant has done her education up to FA and nothing more. If any marks increased from 553 to 653 in the Matriculation certificate or placing therewith a forged/fake/bogus certificate of BA in the name of appellatant would be a drama staged/managed by the illwishers of the appellatant with the active connivance of some officials of the respondent department, which has caused the physical unrest/mental torched/constraints and inevitable agonies beside grate financial loss.
- g) That the appellatant has neither done BA nor tendered/produce any such fake certificate of BA but even then the stigma of fake document has been attributed to the appellatant and the appellatant has been terminated from her services without observing the legal/codal formalities.
- h) That the appellatant has not been served upon any charge sheet, statement of allegation or even show case notice. Needless to say that no formal or informal inquiry has been conducted in instance case and the appellatant has been condemned unheard on her back and no forged documents were confronted to the appellatant.

- i) That from all corners/prospective, the impugned termination order and subsequent final impugned orders are wronged, illegal, unlawful, without lawful authority, without jurisdiction, unconstitutional, un-Islamic, against the norms of natural justice and against the law on the subject.

That as stated above, the appellant had also filed application coupled with a one and the same set of educational/experience documents seeking therein the job of FWW in the office of Project Director populating welfare, adjacent with the office of respondent and the appellant was duly interviewed dated 20/05/2015. Had the appellant intended to increase her marks fraudulently then she would definitely have submitted the set of forged/fake documents even in the office of Project Director Population Welfare KPK Peshawar. To this effect, the appellant most humbly submits that in order to unearth the actual facts and to verify the ground reality and conduct of the appellant, the set of educational documents submitted by the appellant in the office of Project Director Population welfare KPK Peshawar may please be requisitioned in the best interest of justice.

- j) That the impugned order has been passed in the exercise of colorful authority which is unlawful, without lawful authority, without jurisdiction, Un-Islamic, un-constitutional, against the norms of equity and natural justice hence not maintainable in the eyes of law.
- k) That the appellant was discriminated in service and has not been dealt with in accordance with law and has been deprived of her fundamental rights guaranteed by the constitution of the Islamic Republic of Pakistan 1973.
- l) That Further submission will be advanced at the time of hearing the appellant at the bar.

In view of the foregoing facts, circumstances and submissions, it is therefore, humbly prayed that on acceptance of this appeal the final impugned order may be set-aside and the appellant may be reinstated in service with all back benefits, allied allowances and seniority please.

(8)

Any other remedy is available may be also extended in favour of the appellant to meet the ends of justice.

*Sony*  
**APPELLANT.**

Through

*[Signature]*  
Muhammad Usman Khan  
Turlandi  
Advocate Peshawar.

Dated: 22/02/2016

Jehan Afsar Khan Paindakhel  
Advocate Peshawar.

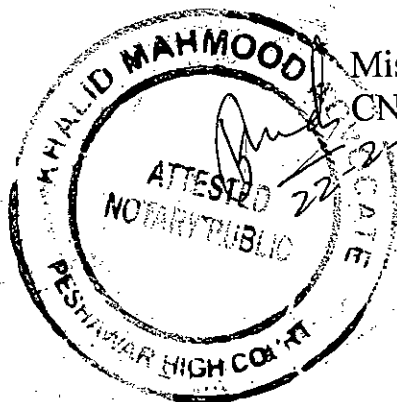
**AFFIDAVIT.**

I, Miss Sony D/O Basweer Gul R/O Mohallah: Pir Gulab Shah, inside Hashtnagri, Tehsil and District Peshawar, Ex-Family Welfare Worker (FWW), Population Welfare Department KPK Peshawar and lastly was posted as FWW (BPS-8) at FW Centre Rano Gari, Peshawar, do hereby solemnly affirm and declare on oath that contents of the accompanying appeal are true and correct to the best of my knowledge and belief and nothing has been kept secret or concealed therein.

**IDENTIFIED BY:**

*Sony*  
**DEPONENT**

*[Signature]*  
Muhammad Usman Khan  
Turlandi  
Advocate Peshawar.



Miss Sony (Appellant)  
CNIC No. 17301-5144310-2



(9)

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

In Ref; to S. Appeal No. \_\_\_\_\_ of 2016.

**Miss Sony.....Versus.....Secretary Population & others.**

**Address of Parties.**

**APPELLANT.**

Miss Sony D/O Basweer Gul R/O Mohallah: Pir Gulab Shah, inside Hashtnagri, Tehsil and District Peshawar , Ex-Family Welfare Worker (FWW), Population Welfare Department KPK Peshawar and lastly was posted as FWW (BPS-8) at FW Centre Rano Gari, Peshawar.

**Versus.**


**RESPONDENTS.**

- 1) Secretary to the Government of Khyber Pakhtunkhwa, 02<sup>nd</sup> Floor, Abdul Wali Khan multiplex, Civil Secretariat, Peshawar.
- 2) Director General, Population Welfare Department, Khyber Pakhtunkhwa, FC Trust Building, Sunehri Masjid Road Peshawar Cantt: Peshawar.
- 3) District Population Welfare Officer, Peshawar, Building No. 5 Qafila Road, Tehkal Payan Peshawar.



**APPELLANT.**

Through



Muhammad Usman Khan  
Turlandi  
Advocate Peshawar.

Dated: 22/02/2016

Jehan Afsar Khan Paindakhel  
Advocate Peshawar



42874

ANNEXURE B

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Roll No 56740  
Group HUMANITIES

## PESHAWAR PROVISIONAL AND DETAIL MARKS CERTIFICATE SECONDARY SCHOOL CERTIFICATE EXAMINATION SESSION ANNUAL-2005

Sony

Son/Daughter of Basveer Gulof GOVT GIRLS HIGH SCHOOL NISHTAR ABAD PESHAWAR CITY

has secured the marks shown against each subject, in the Secondary School Examination held in the month of March, 2005 as Regular Student

Subject	Marks	MARKS OBTAINED					
		9Th		10Th		Total	In Words
		Theory	Pract	Theory	Pract		
1. English	150	30	--	28	--	58	Fifty-Eight
2. Urdu	150	32	--	44	--	76	Seventy-Six
3. Islamiyat (Comp)	75	33	--	--	--	33	Thirty-Three
4. Pakistan Studies	75	--	--	36	--	36	Thirty-Six
5. Maths	150	31	--	32	--	63	Sixty-Three
6. General Science	150	35	--	45	--	80	Eighty Only
7. Elements Of Home Econo	150	38	--	54	--	92	Ninety-Two
8. Islamic Studies	150	56	--	59	--	115	One Hundred Fifteen

Total 1050

ATTESTED TO BE  
TRUE COPY

Remarks

553-C

Five Hundred Fifty-Three Only

IS:EHE:

Date of Birth: 24th March, 1988

M. Usman Khan Turlandi  
M, A. LL. B Advocate  
Peshawar.

Date 18-06-2005

Note: Error / Omission accepted. Any mistake in above particulars must be intimated within 30 days after receiving the above certificate.

Controller of Examinations

(Computer Cell BISE, Peshawar)

Diploma No. 979 /NEB/C M W

B/2



Roll No. 71

Nursing Examination Board Khyber Pakhtunkhwa



DIPLOMA IN COMMUNITY MIDWIFERY

This is to Certify that Sony  
Daughter/wife/of Basveer Gui  
having been trained in the CMW/PHS Nishtrabad Peshawar  
has passed the COMMUNITY MIDWIFERY EXAMINATION in First Division,  
of the Nursing Examination Board Khyber Pakhtunkhwa held in Sept. 2010  
She is qualified to conduct NORMAL DELIVERY.

Signature of Vice-Chairman  
M. A. Khan Turlandi  
Peshawar  
Dated: 19-10-11

Signature of Vice-Chairman  
Shamsbad Ouli  
Vice-Chairman

Signature of Controller  
Controller

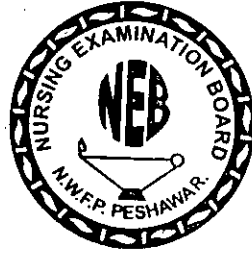
Nursing Examination Board Peshawar  
Khyber Pakhtunkhwa

S.No.....

14

B/3

# NURSING EXAMINATION BOARD



## Community Midwife September 2010 Detailed Marks Certificate

Name: Miss Sony D/O Baseer Gul

Roll No. : 71

The candidate secured the following marks and is placed in First division.

Subject	Marks		
	Allotted	Obtained	In words
Obstetrics			
Theory	100	78	SEVENTY EIGHT
Practical	100	55	FIFTY FIVE
Obstetrical Nursing			
Theory	100	72	SEVENTY TWO
Practical	100	55	FIFTY FIVE
Total	400	260	TWO HUNDREDS AND SIXTY

Date 28-Dec-2010

Prepared by

*Sahail Ahmad*

ATTESTED TO BE  
TRUE COPY

*Zuber Ali*  
Controller

Nursing Examination Board

NWFP, Peshawar.

M. Usman Khan Turlandi

M. A. LL. B Advocate  
Peshawar.

NOTE: Errors & Omission Are Subject To Subsequent Rectification

15

Reg. No. SDCL/AIMS/PESH-05082

Serial No.

1706

Roll No. 5211

B/4

Session: 2013-2014



# Skill Development Council

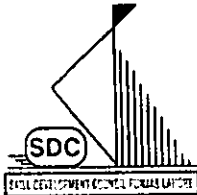
Punjab, Lahore

National Training Bureau, Ministry of Federal Education & Professional Training

Government of Pakistan

www.sdclahore.gov.pk

Competency Based



# DIPLOMA



THIS IS TO ACKNOWLEDGE THAT

**SONI D/O BASVEER GUL**

has successfully completed the prescribed course of study in

Hospital Technician

**LADY HEALTH VISITOR (PART-II)**

Grade 'B' / Percentage: 316/500 = 63%

CONDUCTED AT:

**AL-MADINA INSTITUTE OF MEDICAL SCIENCES  
PEHSAWAR**

Duration: The Candidate has completed the prescribed course of study in Two Modules,  
Consisting of Six Months Each

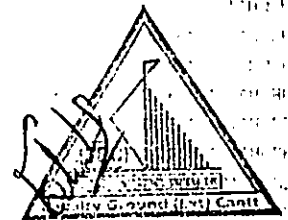
(Date of Issue: 12-01-2015)

ATTESTED TO BE  
TRUE COPY

M. A. Khan Furlandi  
M. A. B. Advocate  
Peshawar.

*[Signature]*

CONTROLLER (EXAMS)



SDC, PUNJAB, LAHORE



# Skill Development Council

Ministry of Federal Education & Professional Training  
Government of Pakistan

**TRANSCRIPT**  
HOSPITAL TECHNICIAN  
**LADY HEALTH VISITOR (LHV PART-II)**  
**(FINAL RESULT)**

Name : SONI D/O BASVEER GUL  
 Roll No : 5211  
 Reg No : SDCL/AIMS/PESH-05082  
 Session : 2013-2014  
 Duration : The candidate has completed the prescribed course of study in Two Modules  
 Each Module consisting of Six Months.  
 Conducted at : AL-MADINA INSTITUTE OF MEDICAL SCIENCES, PESHAWAR

**Module-I**

Sr. No.	Subjects	Total Marks	Marks Obtained
1.	Paper -A (Public Health Practice)	100	55
2.	Paper - B (Maternal Child Health)	100	60
3.	Practical/Viva	50	48
<b>Total</b>		250	163

**Module-II**

Sr. No.	Subjects	Total Marks	Marks Obtained
1.	Paper-C (Hygiene & Communicable Disease)	100	56
2.	Paper-D (Education & Management)	100	58
3.	Practical/Viva	50	39
<b>Total</b>		250	153

<b>Marks Obtained</b>	316
<b>Total marks</b>	500
<b>Percentage</b>	63%
<b>Grade</b>	B
<b>Date of issue</b>	12-01-2015

ATTESTED TO BE  
TRUE COPY

M. Usman Khan Turlandi  
M, A. LL. B Advocate  
Peshawar.

*[Signature]*  
CONTROLLER OF EXAMINATIONS

# BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Roll No: 6047

**PESHAWAR**

## PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE (SUPPLY) EXAMINATION, 2007 HUMANITIES ( Part-II )

Sony Son / Daughter of Basveer Gul

of Peshawar

has secured the marks shown against each subject in the H S S C Examination held in the month of November 2007 as a Private Student

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	35	--	36	--	71	Seventy-One
Urdu	200	66	--	73	--	139	One Hundred Thirty-Nine
Islamic Education	50	36	--	--	--	36	Thirty-Six
Pakistan Studies	50	--	--	35	--	35	Thirty-Five
Civics	200	67	--	58	--	125	One Hundred Twenty-Five
Health & Physical Education	200	48	24	48	20	140	One Hundred Forty Only
Urdu Advance	200	56	--	74	--	130	One Hundred Thirty Only

Total : 1100

676-B Six Hundred Seventy-Six Only

Remarks :

Checked By :

Date of issue: 21 January, 2008

Controller of Examinations

Note: Errors/Omissions accepted. Any mistake in above particulars must be intimated within 30 days of the issuance of this certificate

(Computer Cell BISE Peshawar)

ATTESTED TO BE  
TRUE COPY

M. Usman Khan Turlandi  
M. L. B Advocate  
Peshawar



S.No. 414954

(12)

Roll No. 56740

# Board of Intermediate

N.M.H.

Secondary School

SESSION

This is to Certify that Sony  
and a student of Govt Girls High School Nish

Examination of the Board of Intermediate and Secondary  
candidate. She obtained 553 Marks out of 1000

The Candidate passed in the following subjects:


- |                    |          |
|--------------------|----------|
| 1. English         | 2. Urdu  |
| 5. General Science | 6. Maths |

Date of birth according to admission form Mar

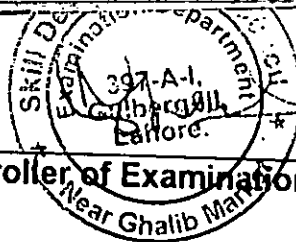
  
Asstt Secretary

This cert

ATTESTED TO BE  
TRUE COPY

  
M. Usman Khan Turlandi  
M. A. LL. B Advocate  
Pesbawar.

Controller of Examination



**SKILL DEVELOPMENT COUNCIL, LAHORE**

397-A-1, GULBERG III, NEAR GHALIB MARKET, LAHORE TEL: 042-35757776, 35764286, FAX: 35763477  
E-mail: info@sdcc.gov.pk, www.sdcc.gov.pk

10/10

10/10

10/10

010574  
**AL-MADINA INSTITUTE**

Affiliated

- SKILL DEVELOPMENT  
Ministry of Labour & Overseas P
- B I S E PESHAWAR
- A PROJECT OF AHBAB  
Reg # 3490 Directorate of Soci



**CERTIFICATE**

IN BASIC

THIS IS TO AC

ATTESTED TO BE  
TRUE COPY

M. Usman Khan Turlandi  
M. A. LL. B Advocate  
Peshawar

SONY D/O

Has successful

**BASIC**

Conduct at: **AL MADINA INSTITUTE**

Duration: Three Month (

  
REGISTRAR (AIMS)



Signature of Dealing Official \_\_\_\_\_

  
Controller of Examinations

The result card is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not itself confer any right or privilege independently to the grant of a proper Certificate/Degree which will be issued under the Regulations in due course.

Note : Pl. Read the instructions overleaf.

Result Declaration Date:

11/07/2014

6/19  
12/19

6/19



012574

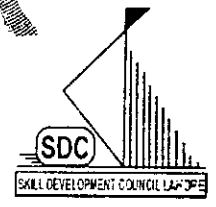
B/10

# AL-MADINA INSTITUTE OF MEDICAL SCIENCES

(21)

Affiliated With

- SKILL DEVELOPMENT COUNCIL LAHORE  
Ministry of Labour & Overseas Pakistanis, Govt Of Pakistan
- B I S E PESHAWAR (Govt Of K.P.K) (Reg# 201)
- A PROJECT OF AHBAB WELFARE ORGANIZATION  
Reg # 3490 Directorate of Social Welfare Deptt Govt Of KPK



## CERTIFICATE

### IN BASIC ULTRASOUND

THIS IS TO ACKNOWLEDGE THAT

ATTESTED TO BE TRUE COPY

M. Usman Khan Turlandi  
M. A. LL. B Advocate  
Peshawar

### SONY D/O BASVEER GUL

Has successfully completed the prescribed course of study in

### BASIC ULTRASOUND

Conduct at: **AL MADINA INSTITUTE OF MEDICAL SCIENCES, PESHAWAR**

Duration: Three Month (Two Month Theory One Month Practical)  
Session: 2011

  
REGISTRAR (AIMS)

  
AL-MADINA INSTITUTE OF MEDICAL SCIENCES PESHAWAR  
DIRECTOR (AIMS)

  
CONTROLLER (EXAMS)

Serial No. 28428

Reg No. GPI (W) / PSH / COMP / 05 / 51

# NWFP TRADE TESTING BOARD

Directorate of Technical Education & Manpower Training

92

B/11



Special & Short Duration Vocational Training Course.

Session 2005

*This is to certify that*

Mr/Miss/Mrs/ SONYA BASEER Son/Daughter/Wife/Widow of BASEER

Roll No. 25281 Resident of PESHAWAR has completed SIX MONTHS Vocational

Training in the Trade of COMPUTER in accordance with the National Occupational Skill Standards

From GPI (W) PESHAWAR with effect from 1-5-2005 to 1-11-2005

The Trade test was conducted by the N.W.F.P. Trade Testing Board on Feb; 2006

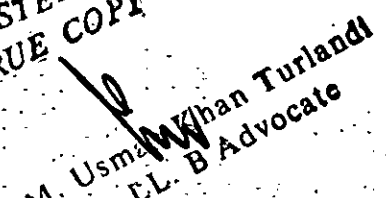
He/She secured the following standards of proficiency:-

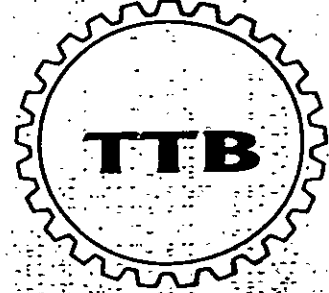
- 1. R. Theory:- 40 /100
- 2. Practical:- 138 /200

And in recognition thereof this Trade Certificate is issued on the 2nd day of the month of March; 2006 /200

ATTESTED TO BE TRUE COPY

  
SECRETARY

  
M. Usman Khan Turlandi  
M. A. LL. B Advocate  
Peshawar.



  
CHAIRMAN



# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

## RESULT INTIMATION CARD

**POSTAGE PREPAID**

No postage Required to be Affixed  
Examinations Department AIOU

23

PROGRAMME: P. T. C SEMESTER: AUTUMN-13

ROLL NO.: AN657986 REGISTRATION NO.: 13NPRO4635

NAME: SONY

FATHER NAME: BASVEER GUL

ADDRESS: H. NO. 169B MOHI PIR GULAB  
SHAH CHOWK SIKANDER PURA  
PESHAWAR PESHAWAR

B/12

SR. NO.	COURSE CODE	ASSIGNMENTS		FINAL MARKS				CONFL MARKS	GRADE	RESULT
		Theory	Practical	Work-Shop	Teach Practice	Exam	Viva			
1	PTC-513 F	82.50				61		67	B	PASS
2	PTC-514 F	86.00				65		71	A	PASS
3	PTC-515 F	80.00				71		74	A	PASS
4	PTC-515 F	77.50				59		65	B	PASS

ATTESTED TO BE  
TRUE COPY

M. Usman Khan Turandi  
M. A. LL. B Advocate  
Peshawar.

Signature of Dealing Official \_\_\_\_\_

**Controller of Examinations**

The result card is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not itself confer any right or privilege independently to the grant of a proper Certificate/Degree which will be issued under the Regulations in due course.

11/07/2014

Result Declaration Date:

Note: Pl. Read the instructions overleaf.

## RESULT INTIMATION CARD

POSTAGE PREPAID

No postage Required to be Affixed  
Examinations Department AIUO.

24

PROGRAMME: P. T. C SEMESTER: SPRING-14  
 ROLL NO.: AW657986 REGISTRATION NO.: 13NPRO4635  
 NAME: SONY  
 FATHER NAME: SASVEER GUL  
 ADDRESS: H. NO. 1678 MOHI FIR GULAB  
 SHAH CHOWK SIKANDER PURA

B/13

PESHAWAR

PESHAWAR

SR. NO.	COURSE CODE	ASSIGNMENTS		FINAL MARKS				CONFL. MARKS	GRADE	RESULT
		Theory	Practical	Work-Shop	Teach Practice	Exam	Viva			
1	PTC-611 F			59				59	C	PASS
2	PTC-617 F	85.00				51		61	B	PASS
3	PTC-618 F	80.00				70		73	A	PASS
4	PTC-619 F	77.50				59		65	B	PASS
5	PTC-620 F	77.00				64		68	B	PASS

ATTESTED TO BE  
TRUE COPY

M. Usman Khan Turlandi  
M. A. E.L. B Advocate  
Peshawar.

Signature of Dealing Official \_\_\_\_\_

Controller of Examinations

The result card is issued, errors and omissions excepted, as a notice only. An entry appearing in it does not itself confer any right or privilege independently to the grant of a proper Certificate/Degree which will be issued under the Regulations in due course.

12/01/2015

Result Declaration Date:

Note : Pl. Read the instructions overleaf.



Government of Khyber Pakhtunkhwa,  
Directorate General Population Welfare  
Post Box No. 235

FC Trust Building Sunehri Masjid Road, Peshawar Cantt; Ph: 091-9211536-38

25

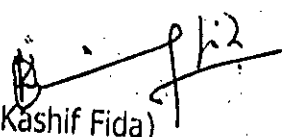
F.No.4(35)/2014-15/Admn-FWW&OT  
Dated Peshawar, the 10<sup>th</sup> April, 2015.

MEMORANDUM

Subject:- RECRUITMENT AS FAMILY WELFARE WORKER (BPS-8), POPULATION WELFARE DEPARTMENT, KHYBER PAKHTUNKHWA

With reference to your application for appointment as Family Welfare Worker (BPS-8) in Population Welfare Department, Khyber Pakhtunkhwa, the candidate named below is directed to appear for interview at 10.00 A.M on 23<sup>rd</sup> April, 2015 in the office of Director General, Population Welfare Department, FC Trust Building Sunehri Masjid Road, Peshawar. You must bring this call letter, all documents, Experience Certificate and Computerized National Identity Card (in original).


- 2. No TA/DA will be paid for appearance in the Interview.

  
(Kashif Fida)

Assistant Director (Admn)

Soni No Baseer Gul,  
Sikandar-pura House No 225  
Mahallah Pir Gulab Shah Peshawar.

ATTESTED TO BE  
TRUE COPY

  
M. Usman Khan Turlandi  
M. A. LL. B Advocate  
Peshawar.

GOVERNMENT OF KHYBER PAKHTUNKHWA  
DIRECTORATE GENERAL POPULATION WELFARE

POST BOX NO. 235

1<sup>st</sup> & 2<sup>nd</sup> Floor FC Trust Building Sunder Masjid Road, Peshawar Cantt.  
Phone No. 921153636

**ANNEXURE** **D**

Dated Peshawar the 10<sup>th</sup> 06, 2015.

**OFFER OF APPOINTMENT**

**E.No.4(35)/2015/Admn-FWW&OTT:-** Consequent upon the recommendations of the Departmental Selection Committee and with approval of the Competent Authority you are hereby offered appointment as Family Welfare Worker (BPS-8) on the following terms and conditions:-

1. You shall get pay at the minimum of pay scale **BPS-08 (6000-350-16500)** including usual allowances as admissible under the rules. You will also be entitled to annual increment as per existing policy.
2. You shall, for all intents and purposes, be civil servant and shall be governed by the NWFP (Khyber Pakhtunkhwa) Civil Servants Act, 1973 and all the laws applicable to the Civil Servants and rules made there under.
3. Your employment is purely temporary as per Govt: rules / policy.
4. You shall produce a medical certificate of fitness from **Medical Superintendent, Police Services Hospital, Peshawar** before reporting yourself for duty as required under the rules.
5. You shall, initially, be on probation for a period of one year extendable up to two years.
6. You have to join duty at your own expenses.
7. You may be posted anywhere in Khyber Pakhtunkhwa.
8. If you accept the above terms and conditions, you should report for duty to the **District Population Welfare Officer, Peshawar** within 15 days of the receipt of this offer failing which your appointment shall be considered as cancelled.
9. Your appointment is subject to verification of all testimonials / documents as well as character antecedents.

**Soni D/O Baseer Gul,**  
**Sikandar Pura House No. 225,**  
**Mohallah Pir Gulab Shah, Peshawar**

Sd/-  
(Director General)  
Population Welfare Department

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Technical, PWD, KPK, Peshawar.
3. District Population Welfare Officer, Peshawar with the request to verify all the documents / testimonials as well as character antecedents of the official and submit report to this office.
4. District Accounts Officer, Peshawar.
5. PS to Advisor to CM for PWD, KPK, Peshawar.
6. PS to Secretary, Population Welfare Department, Peshawar.
7. PS to Director General, Population Welfare Department, Peshawar.
8. Master File.

**ATTESTED TO BE  
TRUE COPY**

**M. Usman Khan Turland**  
**M, A. LL. B Advocate**  
**Peshawar.**

(Kashif Fida)  
Assistant Director (Admn)

(27)

Govt. of Khyber Pakhtunkhwa  
Building No. 2, G-10/1, Islamabad

F.No:1(16)/2013-14/Admn

Dated:-24/06/2015.

OFFICE ORDER:-

In pursuance of Director General Population Welfare Department, Office Order No.4 (35)/2015/Admn/FWW&OTT: dated 10/06/2015, and consequent upon the submission of her arrival report on 12/06/2015, Miss:Soni D/O Basveer Gul (BPS-08) is hereby taken on the staff strength and posted against the vacant post of FWW, FWC Rano-Garri with immediate effect till further order.

District Population Welfare Officer,  
Peshawar

Copy to:-

1. Accountant General, KPK, Peshawar for information.
2. Accountant (Local) for n/action.
- ✓ 3. Official concerned for compliance.
4. FWA (F) FWC Rano-Garri with the direction to hand over the charge.
5. P/F of the official concerned.

ATTESTED TO BE  
TRUE COPY

M. Usman Khan Turlandi  
M. A. LL. B Advocate  
Peshawar.

D. District Population Welfare Officer,  
Peshawar

ANNEXURE **F**

(28)

Government of Khyber Pakhtunkhwa,  
Directorate General Population Welfare  
Post Box No. 235

FC Trust Building Sunehri Masjid Road, Peshawar Cantt. Ph: 091-9211536-38

F.No.4 (35)/2015/Admn/FWW&OTT  
Dated Peshawar the 07/09/2015.

To

The District,  
Population Welfare Officer,  
Peshawar.

Subject: - INQUIRY PROCEEDINGS

I am directed to refer to the above subject and to state that Miss. Soni, newly appointed Family Welfare Worker (BPS-8) may be informed to attend the office of Additional Secretary, Population Welfare Government of Khyber Pakhtunkhwa on 02.09.2015 at 12:30 pm positively with reference to inquiry proceedings regarding complaint lodged against the recent recruitment made by this Directorate please.

*(Signature)*  
(Naseem Ullah)  
Deputy Director (Admn)

Copy forwarded to the:-

- 1. PS to Advisor to CM for PWD, KPK.
- 2. PS to Secretary PWD, KPK.
- 3. PS to Director General, PWD, KPK.

ATTESTED TO BE  
TRUE COPY

M. Usman Khan Turlandi  
M. A. LL. B Advocate  
Peshawar.

*Injunc to attend the office on the said date & time*  
*07/09*  
*07/09/15*  
*07/09/15*

Deputy Director (Admn)

M. A. L. L. Usman Khan Turandi  
Advocate  
Peshawar.

ATTESTED TO BE  
TRUE COPY

9549

*[Handwritten signature]*

*[Large handwritten text in Urdu, possibly a title or case name]*

*[Small handwritten text]*

10 PSACE Pesh  
4.11.2015

*[Handwritten signature]*

*[Small handwritten text]*

*[Large handwritten text in Urdu, possibly a description or reference]*

*[Horizontal lines for text entry]*

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29

ANNEXURE 5

30

ANNEXURE H

GOVERNMENT OF KHYBER PAKHTUNKHWA  
DIRECTORATE GENERAL POPULATION WELFARE  
POST BOX NO.235

Dated Peshawar the 24/11/2015

Office Order

1823246

F.No.4 (35)/2015/Admn/FWW&OTT-Vol-II: Upon verification of Matric Certificate and B.A degree of Ms. Sony, Family Welfare Worker (BPS-8/9), District Population Welfare Office Peshawar (Under probation), the Board of Intermediate & Secondary Education and University of Peshawar respectively declared the same as fake.

Consequent upon this, the services of Ms. Sony Family Welfare Worker(BPS-8/9) are hereby terminated with retrospective effect i.e. from the date of appointment (10/06/2015) as per clause-9 of the offer of appointment bearing F.No4(35)/2015/Admn-FWW&OTT/4148-55 dated 10/06/2015.

Sd/-  
(Director General)  
Population Welfare Department

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Technical, PHQr, Peshawar.
3. District Population Welfare Officer, Peshawar to recover all the pay and allowances so far paid to Miss. Sony, Family Welfare Worker BPS-8/9 under intimation to this office.
4. PS to Advisor to Chief Minister, for Population Welfare Khyber Pakhtunkhwa.
5. PS to Secretary Population Welfare Department, Khyber Pakhtunkhwa.
6. PS to Director General, Population Welfare Department Khyber Pakhtunkhwa.
7. Official concerned.
8. P/F of the official concerned.
9. F.No.4(21)/2015/Admn.

(Hidayat Khan)  
Deputy Director (Admn)

Govt. of Khyber Pakhtunkhwa  
Population Welfare Department  
Office of the District Population Welfare Officer, Peshawar.  
Building No.5 Qasfi Road Tehkal Pawan Peshawar.

F.No:1(27)/Admn-2013

Dated: 26/11/2015.

Copy to:-

1. Accountant (Local) for information & n/action.
2. Official concerned.
3. I/C FWC concerned for information.
4. P/F of the official concerned.

Dy District Population Welfare Officer,  
Peshawar

Miss Sony

FERN

1/2 five Rano Jashi

To

The Secretary,  
Population Welfare Department  
Khyber Pakhtunkhwa Peshawar.

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED OFFICE ORDER DATED 24/11/2015 OF THE OFFICE OF THE DIRECTOR GENERAL POPULATION WELFARE K.P.K.

RESPECTFULLY SHEWETH,

In Reference to office order dated 24/11/2015 i.e termination order of the appellant, the appellant most humbly submits the instant Departmental Appeal to the following effect:-

1. That the appellant was appointed through a transparent manner in light of advertisement in the newspaper of wide circulations & after going through the required criteria laid down in the form of tests & interview.
2. That getting on to the rolls of this prestigious department & after serving therein for almost six months i.e 12/06/2015 (date of appellant is attached), the appellant was terminated from service vide the impugned office dated 24/11/2015 (copy of impugned order dated 24/11/2015 is attached).

ATTENDED TO BE  
PAGE COPY  
*M. Usman Khan Turlandi*  
M. A. LL. B Advocate  
Peshawar.



3. That the appellant was terminated, allegedly on the basis of submission of fake documents, from services & that allegedly the appellant has cheated the department by posing herself as being eligible for the post of Family Welfare Worker (BPS-8/9) & BY getting recruited thereon.
4. That the allegations of fake documents or exercising fraud or cheating over there are false, baseless & incorrect, hence all such allegations are sternly denied.
5. That the appellant has done education upto F.A under R/No 6047. Besides the above the appellant has acquired Ultra-Sound Diploma of two years from Al-Madina Institute, duly affiliated with Skill Development Council Lahore, P.T.C from Allama Iqbal open University Mardan, L.H.V Diploma from S.D.C Lahore & has also attended different courses viz-a-viz health care arranged by different NGOs. (Copies are attached).
6. That neither any certificate or diploma of the appellant is fake, bogus nor concocted or fabricated one, but all are genuine & real, but deposing the same & labeling the same as fake one, the very character & personality of the appellant has been shattered & has subject the appellant to inevitable agonies & mental constraints.
7. That neither the appellant has done B.A, nor any of the appellant documents are bogus & fake, but even

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M. Usman Khan Turlandi  
M. A. LL. B Advocate  
Peshawar.

then the stigma of fake documents has been attributed towards the appellant & the appellant was terminated, which under the law is not allowed.

8. That there issued neither any charge sheet, statements of allegation or even show Cause Notice, neither there ever conducted any inquiry, nor the appellant was ever called by any Inquiry Officers or Committee & thus the appellant was condemned unheard without any fault on her part.
9. That from all prospective the termination order is wrong, illegal, unwarranted & liable to be discarded & set aside & the appellant is entitled to be re-instated into service with all back benefits.

It is, therefore, most humbly that on acceptance of the instant departmental appeal the impugned office order dated 24/11/2015 of the office of the Direction General Population Welfare Department Khyber Pakhtunkhwa Peshawar, may very graciously be set aside & by doing so the appellant be re-instated into service with all back benefits.

ATTESTED TO BE  
TRUE COPY

M. Usman Khan Turlandi  
M. A. LL. B Advocate  
Peshawar.

Dated: 21/12/2015

Appellant

Miss Sony

Ex- Family Welfare Worker

Population Welfare Deptt

K.P.K Peshawar

836/  
22/12/15

Sony



(34)

ANNEXURE - J

GOVERNMENT OF KHYBER PAKHTUNKHWA,  
POPULATION WELFARE DEPARTMENT  
02<sup>nd</sup> Floor, Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar

No. SOE (PWD) 1-3/2015/Inquiry/ 8816-12  
Dated Peshawar the 31<sup>st</sup> December, 2015

To

Miss Sony,  
Ex-FWW, DPW Office,  
Peshawar.

Subject: - DEPARTMENTAL APPEAL AGAINST THE IMPUGNED OFFICE ORDER DATED 24-11-2015 OF THE OFFICE OF THE DIRECTOR GENERAL POPULATION WELFARE K.P.K.

I am directed to refer to your Departmental Appeal dated 21-12-2015 on the subject noted above and to state that the competent authority has regretted your appeal as your Matric Certificate and B.A. Degree were found fake.

*[Signature]*  
31/12/2015  
SECTION OFFICER (ESTT)

Copy to the: -

1. PS to Advisor the CM for PWD, Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary, PWD, Khyber Pakhtunkhwa, Peshawar.

*to concerned.*

SECTION OFFICER (ESTT)

Govt. of Khyber Pakhtunkhwa  
Population Welfare Department  
Office of the District Population Welfare Officer, Peshawar.  
Building No.5 Qafila Road Tehkal Payan Peshawar.

F.No:1(27) 2016/Admn

Dated: 28/01/2016.

Copy to:-

1. PS to Advisor to CM for PWD, KPK, Peshawar.
2. PS to Secretary, PWD, KPK, Peshawar.
3. Accountant General, KPK Peshawar.
4. Accountant (local) for information & n/action.
- ✓ 5. Mrs.Sony, Ex-FWW for information.
6. Personal file of the official concerned.

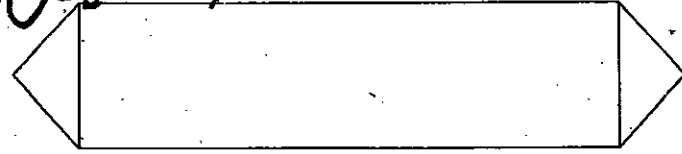
ATTESTED TO BE  
TRUE COPY  
*[Signature]*

*[Signature]*  
Dy District Population Welfare Officer,  
Peshawar

*[Signature]*  
M. A. LL. S Advocate  
Peshawar.

بعدالت کے پی کے سنٹر و س ٹریبونل ایسٹار

(35)



مورخہ

مقدمہ

دعویٰ

جرم

2016ء جناب

مسن سوئی بنام  
دفتر لہیر گل  
سابقہ FWN فیبر کٹونزا  
قلم ایبود ابادی کے پی کے سنٹر  
بابت تحریر آنکے ایسٹارٹ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی اور جواب دہی وکل کاروائی متعلقہ  
M. Usman Khan Turiandi  
M. A. E. L. B Advocate  
Peshawar. کیلئے آن مقام KPK-ST

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل 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  
زرائیں 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 وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں  
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

ATTESTED  
&  
ACCEPTED.

2016

المرقوم بالشمس  
ماہ فروری

Stamps

محمد عثمان خان ترلانڈی

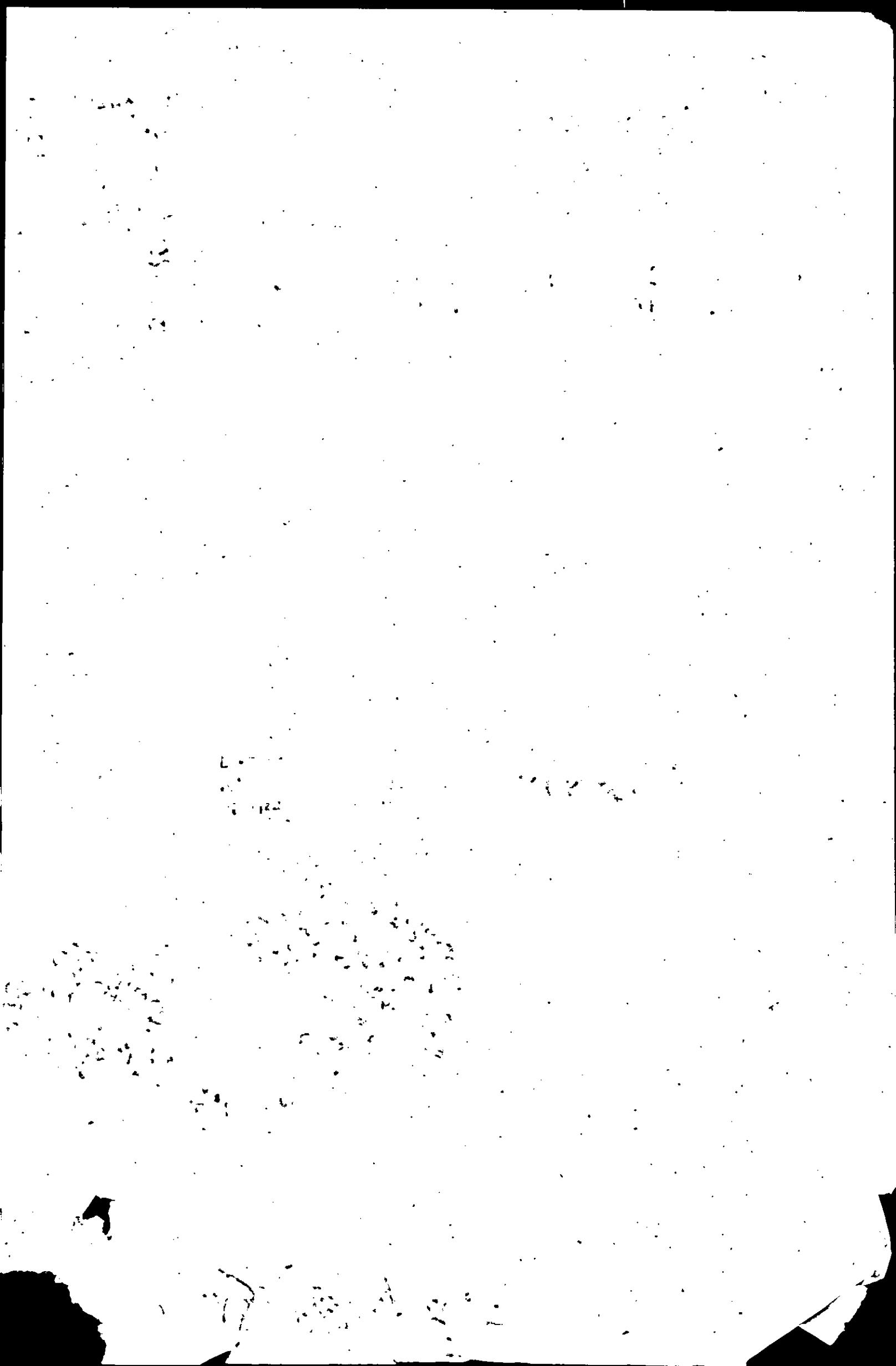
ایڈوکیٹ پشاور حائی کورٹ  
عدالت سیشن پشاور

پوک مشنری پشاور ٹی فون: 2220193

Mob: 0345-9223239

کے لئے منظور ہے۔

مقام KPK-ST



**BEFORE THE HONORABLE SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No.163/2016

Miss. Sony

.....  
(Appellant)

***VERSUS***

1. Government of Khyber Pakhtunkhwa and Others. .... (Respondents)

*Index*

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3.	Letter of B.I.S.E, Peshawar	A	4-5
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**DEPONENT**  
Sagheer Musharaf  
Assistant Director (Lit)

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

Appeal No. 163/2016

Miss. Sony.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa and others ..... Respondents

**JOINT PARAWISE COMMENTS / REPLY ON BEHALF OF OFFICIAL RESPONDENTS**

Respectfully Sheweth,

**Preliminary Objections**

- A. The appellant has no prima facia case and no cause of action to file the instant appeal.
- B. The appeal in hand is filed with malafide intention.
- C. The appellant has no locus standi to file the instant appeal.
- D. The appellant has not approached to this Hon'able Tribunal with clean hands.
- E. The present appeal is based upon malicious / vexatious and frivolous grounds.

**ON FACTS**

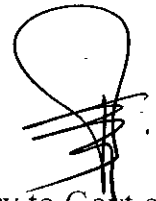
- 1) Pertains to record. However it is pertinent to mention that upon verification on the academic documents from the respective Board / University authorities, it was found out that her Metric and BA Degree are fake and bogus. Thus her termination order has rightly issued. (Annex A & B)
- 2) Incorrect as explain in Para 1 above
- 3) Incorrect as explain in Para 1 above.
- 4) Incorrect as explain in Para 1 above.
- 5) Incorrect as explain in Para 1 above.
- 6) Incorrect as explain in Para 1 above.
- 7) Pertains to Anti-corruption Department hence needs no comments.
- 8) As explained in Para 1 above.
- 9) Correct to the extent that the departmental appeal of the appellant was considered and replied accordingly.(Annexure-C)
- 10)As explained in Para 9 above.
- 11) No comments.

**ON GROUNDS**

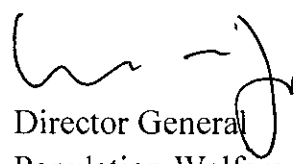
- A)Incorrect as explain in Para 1-6 of the facts above. Due to her fake and bogus academic documents, she has been rightly terminated from service.
- B)Incorrect as explained in ground "A" above
- C) Incorrect as explained in ground "A" above
- D)Incorrect as explained in ground "A" above

- E) Incorrect as explained in ground "A" above
- F) Incorrect as explained in ground "A" above
- G) Incorrect as explained in ground "A" above
- H) Incorrect as explained in ground "A" above
- I) Incorrect. Every government department is abide by law, rules and regulations.
- J) Incorrect. As explained in above.
- K) Incorrect. As explained above.
- L) No comments.

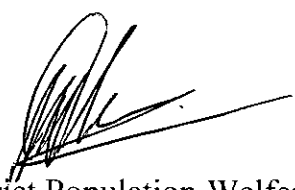
It is therefore respectfully prayed before the Honourable court to dismiss the instant appeal in public interest.



Secretary to Govt of Khyber Pakhtunkhwa  
 Population Welfare Department  
 Respondent No.1



Director General  
 Population Welfare,  
 Respondent No.2



District Population Welfare Officer  
 Peshawar, Respondent No.3



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

Appeal No. 163/2016

Miss. Sony ..... Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa and others ..... Respondents

**COUNTER AFFIDAVIT**

I, Sagheer Musharraf, Assistant Director (Lit), Directorate General, Population Welfare, Khyber Pakhtunkhwa, Peshawar do hereby solemnly affirm and declare on oath that the contents of the **comments/reply** are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.



Deponent

NIC# 17301-1642774-9



# BOARD OF INTERMEDIATE & SECONDARY EDUCATION

## PESHAWAR

No. 1586/SSC/Cert/BISE/Peshawar

Dated: 16/11/2015

To,

Deputy Director Admin  
Directorate General Population Welfare Peshawar

Subject; VERIFICATION OF MATRICULATION (SSC) CERTIFICATE

Memo;

Reference to your letter No: 4 (35) 8027-29 Dated; 16/11/2015

Enclosed please find herewith (06) Photostat copy/copies of Original Certificate of SSC Examination in respect of the candidate mentioned in your letter with the remarks noted against each.

I am directed to inform you that the particular of attached SSC Certificate is checked and he obtained (553) instead of (653). Signature and S.NO.424054 is also FAKE / BOGUS and not issued by this office.

Assistant Secretary (Certificate)  
Board of Intermediate & Secondary  
Education Peshawar

16/11/15

Pl. Date and  
Signature  
17/11

AS  
Sri/Asst

17/11

# UNIVERSITY OF PEHAWAR

Session: Autumn-2014

SONU

Register of POSTGRADUATE

DISTANCE EDUCATION

Proposed examination held for JULY 2014

The Degree of BACHELOR OF ARTS

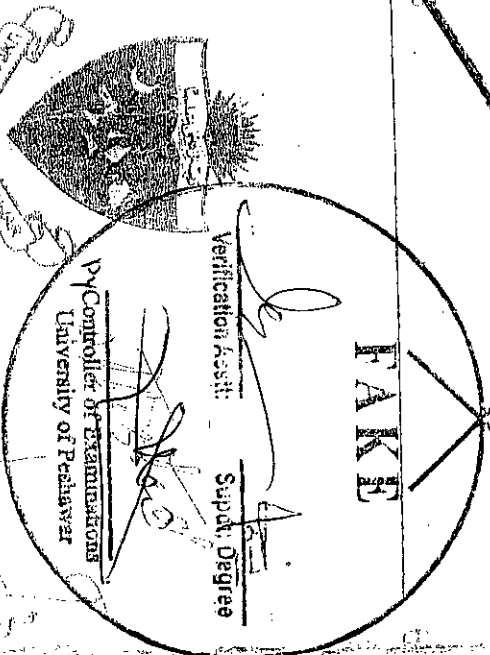
The examination for the term AS A WHOLE

Registration No. 2012PE-447

Roll No. 72869

Exam Date: SEPTEMBER 12, 2014

SECOND DIVISION



**FAKE**

2100

Signature



(34) ANNEXURE J8  
GOVERNMENT OF KHYBER PAKHTUNKHWA,  
POPULATION WELFARE DEPARTMENT  
02<sup>nd</sup> Floor, Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar

No. SOE (PWD) 1-3/2015/Inquiry/ 2216-12  
Dated Peshawar the 31<sup>st</sup> December, 2015

To

Miss Sony,  
Ex-FWW, DPW Office,  
Peshawar.

Subject: - DEPARTMENTAL APPEAL AGAINST THE IMPUGNED OFFICE ORDER DATED 24-11-2015 OF THE OFFICE OF THE DIRECTOR GENERAL POPULATION WELFARE K.P.K.

I am directed to refer to your Departmental Appeal dated 21-12-2015 on the subject noted above and to state that the competent authority has regretted your appeal as your Matric Certificate and B.A. Degree were found fake.

*31/12/2015*  
SECTION OFFICER (ESTT)

Copy to the: -

1. PS to Advisor the CM for PWD, Khyber Pakhtunkhwa, Peshawar.
2. PS to Secretary, PWD, Khyber Pakhtunkhwa, Peshawar.

SECTION OFFICER (ESTT)

Govt. of Khyber Pakhtunkhwa  
Population Welfare Department  
Office of the District Population Welfare Officer, Peshawar.  
Building No.5 Qafila Ewad Tehkal Payan Peshawar.

F.No:1(27) 2016/Admn

Dated: 28/01/2016.

Copy to:-

1. PS to Advisor to CM for PWD, KPK, Peshawar.
2. PS to Secretary, PWD, KPK, Peshawar.
3. Accountant General, KPK, Peshawar.
4. Accountant (local) for information & n/action.
- ✓ 5. Mrs. Sony, Ex-FWW for information.
6. Personal file of the official concerned.

ATTESTED TO BE  
TRUE COPY  
*mw*

*[Signature]*  
Dy District Population Welfare Officer,  
Peshawar

*[Signature]*  
Adv. Khan Farlandi  
Adv. L.L. B. Advocates  
Peshawar.

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

In Ref; to S. Appeal No. **163/** of 2016.

**Miss: Sony.....Versus.....Secretary Population & others.**

**REJOINDER ON BEHALF OF THE APPELLANT.**

**REPLY TO THE PRELIMINARY OBJECTIONS:-**

- A) Incorrect. The appellant has a good case arguable and is sanguine of its success while having proper cause of action.
- B) Incorrect. The appeal has never been filed on malafide intention rather it has filed on bonafide intention.
- C) Incorrect. The Appellant has proper locus-standi while filing the instant appeal.
- D) Incorrect. The appellant with his clean hands had approached this august Tribunal.
- E) Incorrect. The instant appeal has been filed on real and actual facts and no facts whatsoever have ever been concealed from this august Tribunal.

**FACTS :-**

- 1) Incorrect. Reply to Para-1 is ambiguous and misconceived. The appellant being highly eligible, having passed her matriculation examination with 553/C marks, being the requisite qualification and had joined the services as Family Welfare Worker (FWW). The appellant has also passed her intermediate examination (Grade-B) with 676/1100 marks which would be deemed an extra/higher qualification. As per advertisement (Annexure A) if seen at a glance, the required educational qualification for the post of FWW is/was metric and nothing more whereas the appellant has passed her matriculation examination in the session Annual 2005 by obtaining 553 marks out of 1050 and has been placed in Grad-C and the appellant has also done her education up to FA in the session supply 2007 by obtaining 676 marks out of 1100. The appellant has procured her job on the basis of the

educational qualification mentioned above coupled with the other allied/relevant technical qualification in terms of LHV diploma, 2 years ultrasound diploma and other different course viz-a-viz health care arranged by different NGOs wherein there is no fake certificate/diploma.

The allegations of fake documents are false, fabricated, baseless and incorrect hence all such allegations are denied. As per appended Metric certificate, which transparently transpires that the appellant has obtained 553 marks which was/is sufficient to get the job of FWW then what was the necessity/logic to enhance/increase the marks from 553 to 653. fraudulently and to convert the original/valid document into forged one. The appellant has never increased her marks in her Matric certificate nor has ever produced her BA Degree as she has never passed her BA. The questioned BA certificate might have been arranged by some ill-wishers and this fact could be thrashed-out if a regular and proper inquiry would have been conducted.

- 2) Incorrect;- As explained in Para-1 above.
- 3) Incorrect;- As explained in Para-1 above.
- 4) Incorrect;- As explained in Para-1 above.
- 5) Incorrect;- As explained in Para-1 above.
- 6) Incorrect;- As explained in Para-1 above.
- 7) Annexure "G" with the main Service Appeal is self explanatory whereas the appellant was summoned to attend the office and by producing her original documents to record her statement.
- 8) Incorrect;- As explained in Para-1 above.
- 9) Incorrect: the departmental representation has never been considered legally and except to reject the appeal with a single stroke of pen no legal reply has been given.
- 10) Incorrect;- As explained in Para-9 above.
- 11) Legal one.

**GROUND.**

- a) Incorrect:- As explained in the preceding Para-1 of the facts it is respectfully added that, the reply is ambiguous, misconceived and

denied the major punishment on such malicious, vexatious, and frivolous grounds is against the canon of law and is liable to be set-aside.

- b) Incorrect:- As explained in Para-A above.
- c) Incorrect;- As explained in Para-A above.
- d) Incorrect;- As explained in Para-A above.
- e) Incorrect;- As explained in Para-A above.
- f) Incorrect;- As explained in Para-A above.
- g) Incorrect;- As explained in Para-A above.
- h) Incorrect;- As explained in Para-A above.
- i) Incorrect. Reply to Para-i is ambiguous and misconceived hence denied.
- j) Incorrect:- Detailed reply has been given in Para above.
- k) Incorrect. Detailed reply has been given in Para above.
- l) Legal.

It is therefore humbly prayed that the comments submitted by the respondents be set at naught and the appeal of the appellant may graciously be accepted by redressing her grievances as prayed for in the appeal.

Sony  
APPELLANT.

Through

Muhammad Usman Khan  
Turlandi  
Advocate Peshawar.

Dated: 23/11/2016

**AFFIDAVIT.** I, Miss Sony D/O Basweer Gul R/O Mohallah: Pir Gulab Shah, inside Hashtnagri, Tehsil and District Peshawar , Ex-Family Welfare Worker (FWW), Population Welfare Department KPK Peshawar, do hereby solemnly affirm and declare on oath that contents of the accompanying Rejoinder on behalf of the appellant are true and correct to the best of my knowledge and belief and nothing has been kept secret or concealed therein.

**IDENTIFIED BY:**

Muhammad Usman Khan  
Turlandi  
Advocate Peshawar

**DEPONENT**

Sony

**ATTESTED**



22/11/16

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No 25 /ST

Dated 08/01/2018


To

The District Population Welfare Officer, Peshawar,  
Building No. 05 Qafila Road, Tehkal Payan ,  
Government of Khyber Pakhtunkhwa,  
Peshawar.

Subject: **JUDGEMENT/ORDER IN APPEAL NO. 163/16 MISS. SONY.**

I am directed to forward herewith a certified copy of Judgment/Order dated 22/12/2017 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

*ole*