## 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, Deputy District Attorney

For respondents.

MR. NIAZ MUHAMMAD KHAN, MR. MUHAMMAD HAMID MUGHAL, CHAİRMAN

**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.

(Niaz Muhammad Khan) Chairman

(Muhammad Hamid Mughal) Member

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) Me/Jiber

(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)

thairman

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

<u>ANNOUNCED</u> 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 AAMR NAZIR)

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



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.

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Charrinan

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	 	
6 N	162 /2016	
Case No.	163 /2016	

	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	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
2	29-2-2016	proper order please.  REGISTRAR
	2)-2 2010	This case is entrusted to S. Bench for preliminary
		hearing to be put up thereon $01-03-2016$
-		CHARMAN
	·	
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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.

Dt. ZZZ /2016

Mr.Muhammad Usman Khan Adv. Pesh.

2-2016. Resubmitted ofter proper Completion at directed/desired above.

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

In Ref; to S. Appeal No. <u>|63</u> of 2016.

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

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Dated: 22/02/2016

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Through

Muhammad Usman Khan

Turlandi

Advocate Peshawar.

Jehan Afsar Khan Paindakhel Advocate Peshawar.

## BEFORE THE Khyber Pakhtunkhwa SERVICE TRIBUNAL PESHAWAR.

In Ref; to S. Appeal No	163	of 2016.	Sorvice spices
			Diary 1.129

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.

.....<u>APPELLANT</u>.

population Welfare Department

## **VERSUS**

1) Secretary to the Government of Khyber Pakhtunkhwa, 102<sup>nd</sup> Floor, Abdul Wali khan multiplex, Civil Secretariat, Peshawar.

 Director General, Population Welfare Department, Khyber Pakhtunkhwa, FC Trust Building, Sunehri Masjid Road Peshawar Cantt: Peshawar.

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.

## 

### 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.

## 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).

- 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 pin 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.

## GROUNDS:-

- 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 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.
- f) That the appellant 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 appellant at the time of her appointment as the appellant 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 appellant would be a drama staged/managed by the illwishers of the appellant 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 appellant 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 appellant and the appellant has been terminated from her services without observing the legal/codal formalities.
- h) That the appellant 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 appellant has been condemned unheard on her back and no forged documents were confronted to the appellant.

(7)

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 dealth with in accordance with law and has been deprived of her fundamental rights guaranteed by the constitution of the Islamic Republic of Pakistan 1973.
- I) 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.

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

Through

Muhammad Usman Khar

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.

HIGH CO

**IDENTIFIED BY:** 

Muhammad Usman Khan Turlandi

Advocate Peshawar.

**DEPONENT** 

Miss Sony (Appellant)

No. 17301-5144310-2



## <u>PESHAWAR.</u>

Miss Sony	Versus	Secretary F	Population & other	ers.
•				

## Address of Parties.

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

## **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.**

- 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

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و عركية تري مد ١٨ بيال منه ١٤. مال كا	3-46 2-18 308 370 15 11-18	71.52	5	استيورد سي آرين جيز مينون ادي کامري کليد	زرن ا -02 زرن 2-10	(A) (A) (A) (A) (A) (A)
	الى مروت قد مروان 5 ما عمر قد الأكتفال و مروف ا	lartized	-	( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( )	(102-2017 (ران13-10	
	رِ 'شَا زَكِلْ 4 'صوالي5 'موات ذَ' نَا كُلُّ أَ الورَّورُرُ 3 · ·	ا فاور		Transport	زون 4-01 🚽 🏅 🔭	1.0
ئېرە پختونخوا كے مروبہ قوالين (Laject Policy)	خەستەن رغورلىين كيامانگا_(2) قىلمۇقرد مال تىكومت ج	رينيان وروزغم أأبي وفراسه مصارمه فيوان	(r.)		رَبن 01-5	
グーニー レジーリリバ リーミアしん ニッパし とこりご	ور روا بازگار (۵۱) مطلوب سنج سے اگر دامنہ و روستماسہ د	TARREST LANGE Love Co. 3	Ja	) قنام تغرر بال حكوم = خيبر بحونوا ي	الى ورخواستول برخورتين كيا جانيا (ا	عمل ادر ترب موسول وروا
نونات كيا جانيكا . (6) درخماست ادراننا يي آسا	و پران کے (ویدیائل کے مطابق متعاقد علم کیا لیے محرفی وقت	ع). ده نخ شده امران ایکا قال طاله الما		هانگا به (۱۷) نمخب شده امید داردن کو تبرر در مین		
	مسرق مورث 200	يات كانام واشع طور رترير او-		مِن مُمَاد لِوَسل فَ أَرْفُوا ثَيْنَ وَفِ الْكِنَّةِ و كِي مُصَوِّى كُوفِر بِرالْمُ المِيدوارش فِي كَا	) موکاری (ییم مرکاری اداروں سے الما دور خوش میں سید و سا	ی کامینا به کیاجا ملتان به (5) منابع نام مرام مرد که
				والع من والدير الماسيد الرواد المال كرف	) ہے۔ (1) اور اور ان کمنے وسط ادارار اور اور اور اور اور ان کمنوک ای	ا حول ۱۰۰۵ ویل ما ۱۰۵۰ ما مورکا دیده کار از از از از مرکز از مورکا
	والزيم وتكمه بهبودا إدى فيبز مختوط اليك مي		Ş.	06-01-20158		
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بده بل ابتلاح من ﴿ مُومَاكُن مِرُوكِمَا الْجَدِّينَ } إِذَا	محكمه بهروا آبادك بنير بجوتوا كواسينه ماتحت مندره	00-00- 3		A STATE OF THE PARTY OF THE PAR	والشيل مطلوب	4 2 1 2 m
وبركر ينف كالمحاطوب معارا فراقد يرابدا	(7 إ-2014) رِإجِكت كيلي مندود ويل إسام ون ك			ه (۲۷۲-۲۱۷-۲) پراجیک کی خال	DE COME TOURS AS	
ا تخواه (Pixed Pips) كيليخة ورخواسيل مطلوب	والله اميدوارول من براجيك يالمبي بل معين شعر	05-02-19	85- 1	روم) خرافار بدااتر فراسلامیداردل	غريجيد ين ( / 2014-2014)   (17) غير اگير كورا لرمطام ممارا	يوا ياول منجر محو توان اوروت . او من استرام عند توان
	ورخواست ساده كاغلر بمعاقب الساد اومياك ووعرو			مواوب میں روخواست سادہ کا نغری مواوب میں روخواست سادہ کا نغری	روبیا (ارسیونات) کمکروفواتی اماره Powal Divad	ر) و پر کرے سے میز ہو جو ا ی ایس ہر مصن شرکا
	البدي شدونتول كاراور وسطى كاشامت كا			اخق كارا ل اضديق شده أمثال عامرا	روز بورد در از تنهاد راورکیوزاز ک <sup>ورد</sup> . اسور در از تنهاد راورکیوزاز ک	مورت يو-ن عن من من طوع موارد. درو وادر المورد أثم وورود و والمارد
مطلوب مار	مراد عمران	05-02-20	is"		راندرورج ذيل ية يكاني جاني ما	ل استاد اروپيدا ک ادامار محاجه ي درگذاري او در محک 30 دادر محاليم
آیم لی لالیس بامسادی تابلیت به پاکستان میڈیکل دختا مرنسا میزاد	الله وومن ميذيكل " الكرام ال	05 - 0 3	2 -	د ــــــــــــــــــــــــــــــــــــ	, <u>-, 0 ( -, 0 , -, -, -, -, -, -, -, -, -, -, -, -, -</u>	
ویشل کونسل سے منظور شدہ ہو۔ ان اسد دارا ل) ترجی دی مالیکی جومتعافہ شعبہ میں بحر بدر محمق اول	أيسر ،وي(اي) ا ملاكذ-1	00.00- 3	35	موہمیار سے تیکر و لری یا سادی تعلیم بحد	نداد   • اگر شار ق د دندری	ار ام آسای نو
تري وي ما - مي جو معلقه سعيد من بريد الأالا عمر کي آخري مدا 21 مالا - مال	الالد-ا اورار-ا	. 9 113		سے میرو مرابع عمارات الله الله الله الله الله الله الله ال	ا ن يم سره بيدري - ا 100/40 الزنيب الفاظ في ا	الميورار (
را مری اسری کا این میرانده در در و سیکندری سکول	، يورمر-ا 2 ينيلي يلغيتر كوسل القرام -ا	. 05-02-19	00	ن وليوسه كرمال مو	کپیوژ اونارمیش نیکنالوی <u>می</u>	1
را) کی بیم مده دروسے میشدر کی در) سرفیکیک به (۲) کمی تسلیم شده استی نیوث به	1-(1)20- 2				ام کی ترفی سے ۱۹ سال ا	<u> </u>
دواترى ين سرينكيد به (٣) للاي مركزيمي	الماكذ ا	ſ		ر ایرانست ایرانستان اکنانس میرانستان ایرانستان	ا کی کلیم شده این نوری سے	ر سٹرنیسٹیکل
いー・/ リケン・パーピープレルロブリルー	1- <i>/.7</i>	Lugen	ļ	و کی نیا کا سرب میں بانڈ کلان تیکرو کری ا	المهار مسلكس الوشيا مركي آخرى مد 18 تا 30 سا	اسشنت
سال کا تجربه (۳) مملی دیلفیئر در کر فرینکا .			ļ.	1 W. 160 C. C. C. D. L.	- 201 10202 107	-
سال کا تجربہ (۳) فیلی دیلفیئر در کر فریفا کے۔ سرٹیفیکیٹ _(۵) ممرک آخری مد ۱۶ اسال _ ،		<b>.</b>		ニューアリア ひょくどしょりつい	ا اس سلم شده بور ( ہے سکانا	1 712-1 -
سال کا تجرب (۳) کیلی اینیم ود کرفرینگا. مرفیقایت _(۵) ممرک آخری مد ۱۸ اسال _: سال تکب _				ر دویژن : سیکندری سکول سرفیایت رست تا کیک وکپوژر ااندارمیش تیمناله تی	ا کی سلیم شده بورڈ ہے سیانا معہ 30 الغاظ فی مند کار نآ	1 12.3
سال کا تجربہ (۳) کیلی دیلیئر در کرفر خاک مرتیع کیف _(۵) ممری آخری صد ۱۸ سال: سال تک _ (۱) کمال پائن _(۲) کا ۲۷ افرائی				رِ سے ایک وکیدور انظار میشن کینالویل	مِعه 30 الغاظ في منت كارثآ ( من ذيلور كا حال دو -	J) 22 3
سال کا تجربه (۳) ملی دیلیئر در کرفیظ . مرتعکیف _(۵) مرک آخری مد ۱۸ سال سال تک _ (۱) که ل پائن _(۲) سال تک _ السنس آنونجیانانوی جمام مرتعکیک الموصد	1- (1) 1/20) 3 1-(2)20	TO B		رِ سے ایک وکیدور انظار میشن کینالویل	مد 30 الغاظ في منت كار أما	S) 22 3
سال کا تجرب (۳) میلی دیلیئر در کرفینگا مرتعیک (۵) مرک آخری مد ۱۸ سال د سال تک ب (۱) که ل پائل (۲) سال تک ب الشش آخریک او بی شام مرتعالی دارا دادس کوترتج ری جا کی (۳) مرک آخری ما	1- (1) 1/20) 3 1-(2)20	ATTESTED TO B	B	رِے تاکیک و کہیوٹر الفار میشن کیلنالو تک ل ل	بر 18 الفاظ فى منصف كاد تقا ميل والجد مدكا حال 19 - ممرك آخرى مد 18 تا 10 سا 1 مارك أن ك	19.52 3
سال کا تجرب (۳) میلی دیلیئر در کرفینگا مرتعیک (۵) مرک آخری مد ۱۸ سال د سال تک ب (۱) که ل پان (۲۰ سال تک و اکستس آخریک او بی شام مرتباطیک الولومد وادن کوترتی و کا کی (۳) مرک آخری میا	1- (دائير الحرام - 1 در (اړ) - 1 در (اړ) - 1 در (اړ) - 1 در (اړ) - 1	ATTESTED TO B	B	رِے تاکیک و کہیوٹر الفار میشن کیلنالو تک ل ل	بد 18.0 الناطل مندک را آن جمل فیلورکا حال ہو۔ مرک آخری مد 18 تا 10. سا 1 اسارک فیاک 1 اسارک فیاک	
سال کا تجرب (۳) میلی دیگیر در کرندنگ مرتعکیت (۵) مرک آخری مد ۱۸ سال - ع سال تک - (۱) که ل باس (۲) سال تک - انسنس - آخ بکنالویی شن مرتعکیک الولوسد وادن کوترتی دن جا کی - (۳) مرک آخری س دانون کوترتی دن جا کی - (۳) مرک آخری س کار سال - کار کار کسی اور تربیت یا نیز و و	ا (دائير الحرام - ا (در(ام)-) (ماكند-) الحاكند-) الحرام - ا المرام - ا	ATTESTED TO B	B lands	رِے تاکیک و کہیوٹر الفار میشن کیلنالو تک ل ل	بد 16. الغاط في مندك راق شرفي لوسكا حال 19. مرك آخرى اله 18. سال 1. ما 1 مسكل في كل 1 أسكل في كل المسلك المارا والمسكل	
سال کا تجرب (۳) میلی دیلیئر در کرفینگا مرتعیک (۵) مرک آخری مد ۱۸ سال د سال تک ب (۱) که ل پان (۲۰ سال تک و اکستس آخریک او بی شام مرتباطیک الولومد وادن کوترتی و کا کی (۳) مرک آخری میا	ا (دائير الحرام) ع ا (دير(ام)) ا ا المائية ا ا المائية الحرام ا ا المائية المرام ا ا درو(ام) ا	ATTESTED TO B	B lands	رِے تاکیک و کہیوٹر الفار میشن کیلنالو تک ل ل	بعد 18. الغاط في منت كاد آنا جملة وليوسكا حال 19 در مركمة فرى مند 18 تا 10 درا 1 ما مركمة فركا من 1 1 ما كون كون كار 17 اقدا اقدام تي 1 ما كون كار	z <u>i</u> 563 4
سال کا تجرب (۳) میلی دیگیر در کرندنگ مرتعکیت (۵) مرک آخری مد ۱۸ سال - ع سال تک - (۱) که ل باس (۲) سال تک - انسنس - آخ بکنالویی شن مرتعکیک الولوسد وادن کوترتی دن جا کی - (۳) مرک آخری س دانون کوترتی دن جا کی - (۳) مرک آخری س کار سال - کار کار کسی اور تربیت یا نیز و و	ا (دائيد الحرام عالم عالم عالم عالم عالم عالم عالم عا	ATTESTED TO B	B lands	رِے تاکیک و کہیوٹر الفار میشن کیلنالو تک ل ل	بد 16. الغاط في مند كاراتا بر في لم ركا حال 19 و بر كاراً فو كان 18 - 10 و ما المركز أن كان 1 المركز الما المراكز الما المراكز الما يوادا كاراكز الما يوادا كاراكز المركز الما يوادا كاراكز المركز	z <u>(</u> 5) 4
سال کا تجرب (۳) ملی ویلینو رو کرندنگار مرفعکید (۵) مرک آخری مد ۱۹ سال ۔ (۱) کمرل باس (۲۰ سال ۲۰ سال ۱۳ سال ۱۳ با الشنس آخر کیانا او بی می مرفع کمید لا بلومد ا والوں کوتر تی دی موال اس کا رسام کری آخری مو ۱۳ سال ۱۳ سال ۱۳ سال ۱۳ بری کسی اور تربیت یا نیز دو رسال در (۱) بری کی کا اور تربیت یا نیز دو رسال در	ا (دائير الحرام) ع ا (دير(ام)) ا ا المائية ا المرام ا ا (در(ام)) ا ا المائية ا ال	ATTESTED TO B	B lands	رِے تا مچکا ۔ وکہ یوٹر الفار میتن کیلنالو تک ل ل	بد 18. الغاطل مند کاراتی برا فیلد کا حال ہو۔ برک آخری مند 18 تا 18. سا آ کے گار آخری مند 18 تا 18. سا آ کو گار کار کار کار کار کار کار کار کار کار ک	ا از اوسد 5 از اوسد
سال کا تجر _ (۳) ملی داینی رو رو رفظ کا برای مورد (۵) مرک آخری مد ۱۸ سال  رای کی بان _ (۴) کا بان _ (۱) کا بان _ المورد المورد المورد المورد کا برای کا برای کا برای المورد کا برای مرک آخری ما راید کا برای کا ب	المرام - ال	ATTESTED TO B	B lands	رِے تا مچکا ۔ وکہ یوٹر الفار میتن کیلنالو تک ل ل	بد 16. الناطل صد کرانا بر فیل سر کا مال ۱۱ در بر کرانا فری سد 18 تا 10 درا السل کا السال تا الفرائع کا الاتا الفرائع کا التا الفرائع کا التا الفرائع کا التا التا التا التا التا التا التا ا	z <u>i</u> 563 4
ران کا تجر _ (۳) میلی دافیتر در کرفیک مرفیع یک _ (۵) محرک آخری مد ۱۸ سال _ ران کال بات _ (۲) کال TV ان الاران الدارات ال اسس آخریک الدی می مرفع کالید الم لیور ا دا اور کورت تجدی می اور تربیت یا فید اور (۱) مرک آخری مد ۱۸ سال سے ۱۶ سال الدار الدارات دا ال در خواستوں بر خور تین کی جاما یکا _ (۲) تمام	ا (دائيد الحرام - المرام - ال	TRUE COPY	B lands	رِے تا مچکا ۔ وکہ یوٹر الفار میتن کیلنالو تک ل ل	بد 18. الغاطل مند کاراتی برا فیلد کا حال ہو۔ برک آخری مند 18 تا 18. سا آ کے گار آخری مند 18 تا 18. سا آ کو گار کار کار کار کار کار کار کار کار کار ک	ا از اوسد 5 از اوسد
سال کا تجر _ (۳) محری آخری مد ۱۸ سال  مر مینی ف _ (۵) محری آخری مد ۱۸ سال  ال کی بات _ (۲) کا لیات _ الا ۱۲۷۲ آخری الیات  ال کی آخری میا کی _ (۳) محری آخری میا الیات  ۱۵ سال _ الحد  ۱۵ مر کی آخری مد ۱۸ سال ب ۱۶ حد سال خودی الیات  وال ور قواستوں بر فورتین کیا جائے _ (۲) تما می الیات  وال ور قواستوں بر فورتین کیا جائے _ (۲) تما می الیات الیات  الا ور قواستوں بر فورتین کیا جائے _ (۲) تما می الیات الیات  دا کی در قواستوں بر فورتین کیا جائے الے (۱۲) تما می الیات الیات  دا کی در قواستوں بر فورتین کیا جائے الے (۱۲) تما می الیات  دا کی در قواستوں بر فورتین کیا جائے الے (۱۲) تما می داد در در تاب الیات  در کا کی احد در در تاب در دورتا ہے در دورتا کیات کیات کیات کیات کیات کیات کیات کی	ا (رائيو المرام - ا ا (رائي) المرام - ا ا ور (ابر) - ا ا ور (ابر) - ا ا المرام - ا المرام - ا المرا - ا المرام - ا المرام - ا المرام - ا المرام - ا المرام - ا	TRUE COPY	B lands	رے تا چکا ۔ وکیور وانقاد حیث بینالو بی ا ا ا ا ا ا ا ا ا ا ا ا ا ا ا ا ا ا ا	بد 16. الناطل مند کاراتی الله الله الله الله الله الله الله الل	1513 4 105 5t 5
سال کا تجرب (۳) میلی دافیتر در کرفیک مرفیکیف (۵) مرک آخری مد ۱۸ اسال  (۱) کول بات (۲۰۷۴ کا ۲۰۷۱ وائیک دانس کرتر تج دی جا دلی جسر کو کلیف او لورت دانس کوتر تج دی جا دلی (۳) مرک آخری سال ۱۵ برگی کا در تجاسات بر مورتین کیا جا زیگا – ۱۵ سال دان در خواستوں بر فورتین کیا جا زیگا – ۱۵ سال دان در خواستوں بر فورتین کیا جا زیگا – ۱۵ سال دان در خواستوں بر فورتین کیا جا زیگا – ۱۵ سال دان در خواستوں بر فورتین کیا جا زیگا – ۱۵ سال دان در خواستوں بر فورتین کیا جا زیگا – ۱۵ سال دانس مید دار در در کونا تا بل جا دل میاد در این کونا تا بل جا دل میاد در این کونا تا بل جا دل میاد در این با دار در نیا در اداری کونا تا بل جا دار در نیا در این کونا تا بل جا دار در نیا در این کونا تا بل جا دار در نیا در در ن	ا (رائيور الحرام المرام المرا	TRUE COPY	B urlandi	رے تا چکا ۔ وکیور وانفاز حمق آینالو تی ال ال الا تسنس رائے کے سال تک اسے 15 سال تک اسے 25 سال تک اسے 25 سال تک اسے 25 سال تک	بد 16 الغاط في مند كارا قا بر في له سال ۱۱ و بر المار الما	4 (دان) د عسد 5 چائید 6 سد اور تا تیم و موسول اور خانونو کو اور خانونو کو تو
سال کا تجرب (۳) ملی دیانی و در کرفیدی مرایک تیاب (۵) مرک تو تو کا مد ۱۸ اسال به است کا تیاب کی کا تیاب کا تیاب کا تیاب کا تیاب کی کا تیاب کار کا تیاب	۱- (رائير الحرام ١٠ (ر (ابر) - ١ (ر (ابر) - المر) (ر (ابر) ((ابر) - المر) ((ابر) (((ابر) - المر) ((((((((((((((((((((((((((((((((((((	ATTESTED TO B	iurlandi ocate	رے تا بھا ۔ وکیور وانفاز حمق آینالو تی ال الاً منسس رائے ۔ رائے ۔ رائے ۔ رائے ۔ رائو ۔ رائے ۔ رائے ۔ رائے	بد 18 الغاظ في مند كاراقا بر في له سال ۱۱ من في المساور الما الما الما الما الما الما الما الم	4 (دائيار 5 بائير ، 3 صد ممل اوبيتا نير سيمول اوسيا المهتر والا مكان من خير ومتوثو تو
سال کا تجرب (۳) کی دیائی در کرفیظ کی مد ۱۵ سال می مرکز فیکا کی در ۱۵ مرکز توکن مد ۱۵ سال می سال تک می سال تک در از کا	ا (رائيور الحرام المرام المرا	TRUE COPY	iurlandi ocate	رے تا چکا ۔ وکیو فر انظار حیث بینالو بی ال الکسنس رال تک سال تک سال تک سے 15 سال تک سے 18 سال تک سے الل امید وادر و توال نے وہر آ روائر یا دادر کو تا تا کی جارات نے وہر آ	بد 18 الغاظ في مند كاراقا بر في له سال ۱۱ من في المساور الما الما الما الما الما الما الما الم	ا المراكبات الم

2874

Roll No 56740
Group HUMANITIES

PESHAWAR
AND DETAIL MARKS CERTIFICATE



SECONDARY SCHOOL CERTIFICATE EXAMINATION **SESSION ANNUAL-2005** 

S	ony		Son/Daughter of Basveer Gul		
f	GOVT GIRLS	HIGH SCHOOL	L NISHTAR ABAD PESHAWAR CITY	<u> </u>	
as	secured the m	narks shown aç	gaint each subject, in the Secondary School Examination 1	held in	i the
'nοι	inth of <u>March, 2</u>	2005 as	Regular Student		,

	1	MARKS OBTAINED							
Subject	Marks	9Th		10Th					
		Threory	Pract	Threory	Pract	Total	In Words		
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	<u>-</u> :		36	1.	36	Thirty-Six		
5. Maths	150	31	<u></u>	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		

ATTESTED TO BE Total 1050 TRUE COPY Remarks

553-C Five Hundred Fifty-Three Only

Date of Birth: 24th March, 1988

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

Controller of Examinations

IS:EHE:

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

(Computer Cell BISE, Peshawar)

SERIAL No. U224 (13)	
Diploma No. 979 /NEB/C M W	3/2
Roll No. 7!	
Examination Board Khyber Pakhe	
Riching Examination Board Khyber Hakhing	Millwa
DIPLOMA IN COMMUNITY MIDWIFERY	
This is to Certify that Sony	
Daughter/wife/of Busycor Gui	
having been trained in the <u>CMW/PHS Nishtrabad Peshawar</u> has passed the COMMUNITY MIDWIEEDY BY AND First	
	Division,
of the Nursing Examination Board Khyber Pakhtunkhwa held in Sept.  She is qualified to conduct NORMAL DELIVERY.	. 2010
	The state of the s
Vice-Chairman  Controller	Ou
Nursing Examination Board Peshawar Khyber Pakhtunkhwa	
Dated: 19-Act-11	

NATION BOARD AURSING EXAMIL



## **Community Midwife**

## September 2010

## **Detailed Marks Certificate**

Name: Miss Sony D/O Baseer Gul

Roll No. :

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

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

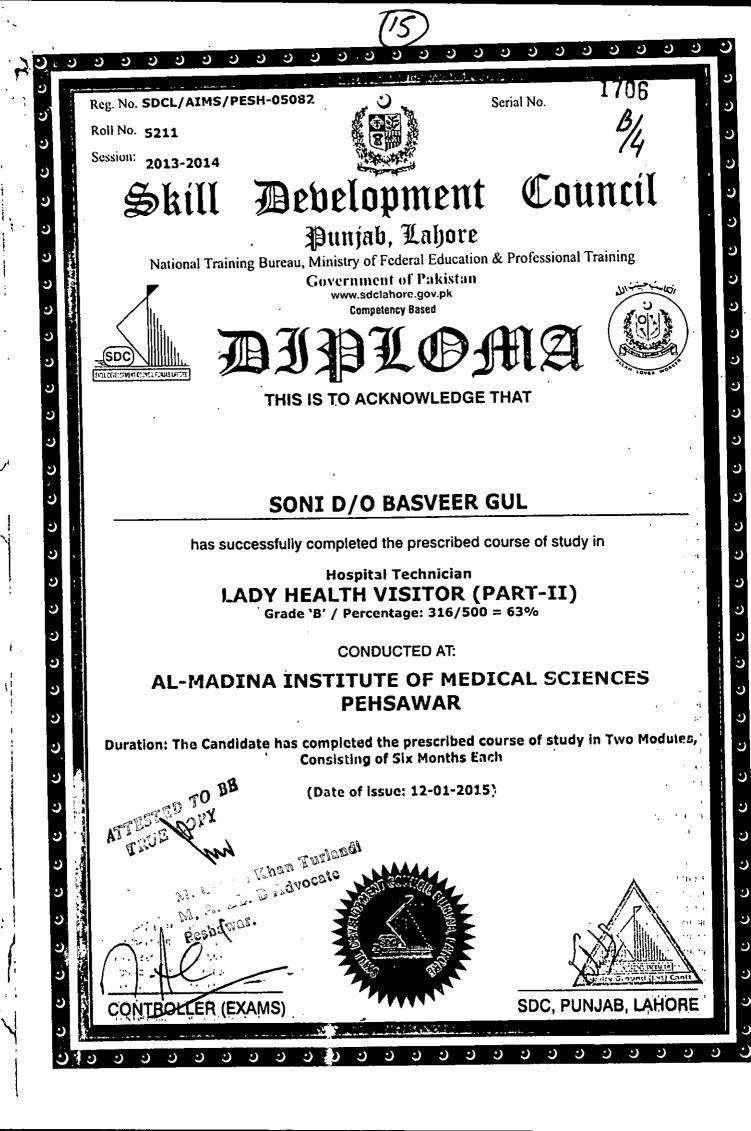
Date 28-Dec-2010
Prepared by Sohail Salamad ATTESTED TO BE

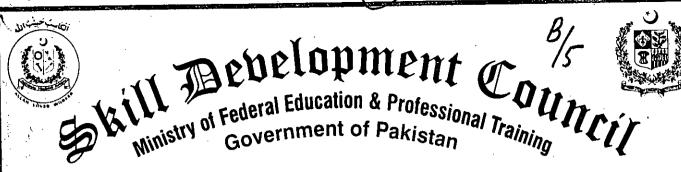
Nursing Examination Board

M. Usman Khan Turk WFP, Peshawar. M, A. LL. B Advocate

Peshawar.

NOTE: Errors & Omission Are Subject To Subsequent Rectification





## **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
	Total	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
	Total	250	153

ATTESTED TO BE

M. Usman Khan Turlandl M. A. EL. B Advocate Peshawar. Marks Obtained316Total marks500Percentage63%GradeBDate of issue12-01-2015

CONTROLLER OF EXAMINATIONS

SKILL DEVELOPMENT COUNCIL PUNJAB, LAHORE

59-A, Street 17, Cavalry Ground (Ext), Lahore Cantt: 54810

Tel: 042-36689293 - 36670378 Fax: 36689294, E-mail: info@sdclahore.gov.pk

www.sdclahore.gov.pk

OF INTERMEDIATE & SECONDARY BY



## PROVISIONAL AND DETAILED MARKS CERTIFICATE INTERMEDIATE (SUPPLY) EXAMINATION, 2007

HUMANITIES ( Part-II )

Sony	<u> </u>	Son / Daughter of Basveer Gul			
of Peshawar	· · · · · · · · · · · · · · · · · · ·				
has secured the mar	ks shown	against each subject in the H S S C Examination held in the month of			
November 2007	ac a	Private Student			

	Marks Obtained							
Marks	Part-I		Part-II		Total	Marks in Words		
	Theory	Pract	`Theory	Pract				
200	35	:	36		71	Seventy-One		
200	66		73		139	One Hundred Thirty-Nine		
50	36				36	Thirty-Six		
50		••	35		35	Thirty-Five		
200	67		58		125	One Hundred Twenty-Five		
200	48	24	48	2Ô	140	One Hundred Forty Only		
200	56		74	£	130	One Hundred Thirty Only		
	200 200 50 50 200	Theory 200 35 290 66 50 36 50 200 67 200 48	Theory Pract 200 35 200 66 50 36 50 200 67 200 48 24	Theory         Pract         Theory           200         35          36           200         66          73           50         36             50           35           200         67          58           200         48         24         48	Marks         Part-II         Part-II           Theory         Pract         Theory         Pract           200         35          36            200         66          73            50         36              50           35            200         67          58            200         48         24         48         26	Marks         Part-I Theory         Pract Theory         Pract Pract Pract         Total Pract Theory         Pract Pr		

Total: 1100

676-B Six Huridred Seventy-Six Only

ATTESTED TO BE Remarks: TRUNGOPY Usman Whan Turland 

Controller of Examinations

(Computer Cell BISE Peshawar)

414954 S.No.

Roll No. 56740

Board of Intermedia

M.M. Secondary Sch SESSIO

This is to Certify that			Sony
and a student of	Govt Gi	rls High S	School Nisl
Examination of the Boar	rd of Intern	nediate a	nd Secon
candidate. She obtain	ed <u>553</u>	Mark	s out of 10
The Candidate passed i	n the follow	wing subj	ects:
1. English	<u> </u>	Urdu	1
<ol><li>General Science</li></ol>	6:	Maths	1
Date of birth according	to admissi	on form	<u>Mar</u>
Day			† }
Asstt Secreta	ry		1
1/27-		\$554284743	This certi
		官組織	and the same

ATTESTED TO BE M. Usman Khan Turlandi M. A. EL. B Advocate bespawar.

Controller

SKILL DEVELOPMENT COUNCIL, LAHORE

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

(3)  RESULT INTIMATION CARD

MADINA INSTI 010574

Affilia

- SKILL DEVELOPME Ministry of Labour & Overseas P
- •BISE PESHAWAR
- A PROJECT OF AHBAB Reg # 3490 Directorate of Soci



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IN BASIC

THIS IS TO AC

ATTESTED. TO BE TRUE

Has successf

M. Usman Khan Turlandi N. Vsman Khan Turlandi M. Sulan Ruan Junan

BASIC

beerynal

Conduct at: AL MADINA INSTITUTE

Duration: Three Month (

Signature of Dealing Official

0

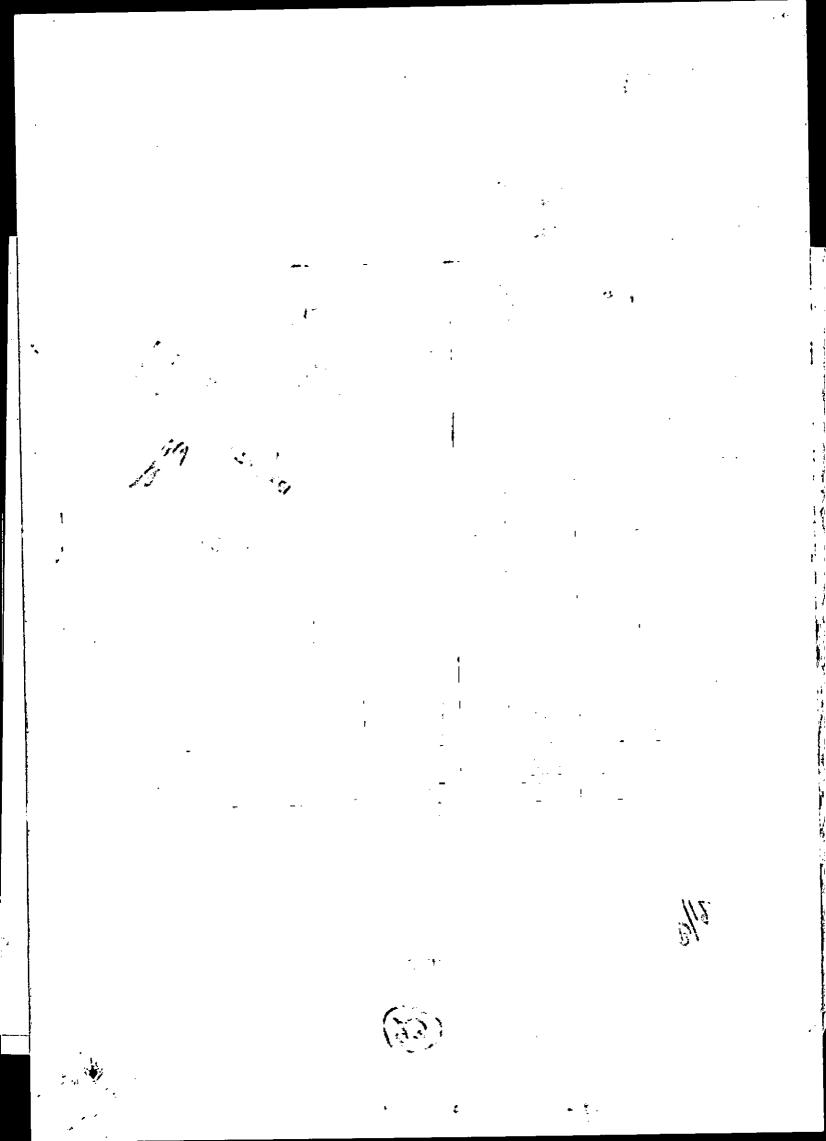
**Controller of Examinations** 

The result card is issued, errors and ommissions 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

Note: Pl. Read the instructions overleaf.

Result Declaration Date:



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)

• 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



IN BASIC ULTRASOUND THIS IS TO ACKNOWLEDGE THAT



M. Usman Khan Turlandi

SONY D/O BASVEER GUL

Has successfully completed the prescribed course of stydy in

BASIC ULTRASOUND

Conduct at: AL MADINA INSTITUTE OF MEDICAL SCIENCES, PESHAWAR

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

Session: 2011

CONTROLLER (EXAMS)



## **ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD**

## **RESULT INTIMATION CARD**

POSTAGE PREPAID No postage Required to be Affixed **Examinations Department AIOU** 

ROGRAMME:

SEMESTER:

AUTUMN-13

OLL NO.:

AN657986

**REGISTRATION NO.:** 

13NPR04635

IAME:

SONY

ATHER NAME:

BASVEER GUL

ADDRESS:

H. NO. 1698 MOHI PIR GULAR SHAH CHOWK SIKANDER PURA

PESHAUAR

PESHALIAR

	COURCE	COURSE ASSIGNMENTS		FINAL MARKS						
SR. NO.	CODE	Theory	Practical	Work- Shop	Teach Practice	Exam	Viva	CONFL MARKS		RESULT
1 2 3 4	PTC-613 P PTC-614 P PTC-615 F PTC-615 P	82, 50 86, 00 80, 00 77, 50				61 65 71 59		67 71 74 65	B A A B	PASS PASS PASS PASS
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,	M. A. L. L. R.	•		_						1
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Signature of Dealing Official	· ·	•	•
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## Controller of Examinations

The result card is issued, errors and ommissions 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

Note: Pl. Read the instructions overleaf.

**Result Declaration Date:** 

## OOO ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

RESULT INTIMATION CARD

## POSTAGE PREPAID

No postage Required to be Affixed Examinations Department AIOU

PROGRAMME:

P. T. C

SEMESTER:

SPRING-14

**ROLL NO.:** 

AW657986

REGISTERATION NO.:

13NPR04635

B/3

NAME:

SONY

**FATHER NAME:** 

BASVEER GUL

ADDRESS:

H. NO. 1698 MOH: FIR GULAB SHAH CHOWK SIKANDER PURA

	PES	HAWAR		/	/ 		HAWAR			
	COURSE	ASSIGN	MENTS	/	FINAL	MARKS		CONFL.		
SR, NO.	CODE	Theory	Practical	Work- Shop	Teach Practice	Exam	Viva	MARKS	GRADE	RESULT
1 2 3 4 5	PTC-618 F	85. OC 80. OC 77. SC 77. OC		59		51 70 59 64		57 61 73 65 68	C B A B	PASS PASS PASS PASS
Š	TESTED TO	Khan T	riandi ,cate							
	W. P. L.									

Signature of Dealing Official

#### Controller of Examinations

The result card is issued, errors and ommissions 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: 891-9211536-38



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

WIRE C

## **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 Identity Card (in original).

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

(Kashif Fida) Assistant Director (Admn)

Sixonder De Baseer Gul,

Sixundas puna House No 225

Mohallah pix Gulab Shah Poshawar.

ATTESTED TO BE

M. Usman Khan Turlandi

M. Usman Khan Turlandi

M. A. L. B. Advocate

Peshawar.

### GOVERNMENT OF KHIBER PAKHTUNKH DIRECTORATE GENERAL POPULATION WELFARE

POST BOX NO. 235

Dated Peshawar the 10-06-2015. -

OFFER OF APPOINTMENT

1148-55

E.No.4(35)/2015/Admn-EWW&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.
- You shall produce a medical certificate of fitness from Medical Superintendent, Police Services Hospital, Peshawar before reporting yourself for duty as required under the
- You shall, initially, be on probation for a period of one year extendable up to two years.
- 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.
- Your appointment is subject to verification of all testimonials / documents as well as character antecedents.

Sd/-(Director General) Population Welfare Department

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

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.

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.

peshawar.

8. Master File.

ATTESTED TO BE (Kashif Fida)

(Kashif Fida)

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Building find, Collin Court Lebbut Laxon Cadianas.

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.
- ダ. 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.

BezpaMat.

ATTESTED TO TRUE COPY M. Usman Khan Turlandi M. A. LL. B Advocate

Strict Population Welfare Officer,

Peshawar

ANNEXURE

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

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

E.No.4 (35)/2015/Admn/FWW&OTT Dated Peshawar the 01/0

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.

Copy forwarded to the:-

1. PS to Advisor to CM for PWD, KPK.

2. PS to Secretary PWD, KPK.

PS to Director General, PWD, KPK

Deputy

Deputy Director (Admn)

REUEN CON M. Usman Khan Turlandi M. A. LL. B Advocate

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.16<sup>MBU</sup>91. SIEDOVDA B. J.J. A.M. Ibasiur asan Khan Turland RAOD EURD NULL STEEL TO BE 87-56 18 20 Tale 10 The 2) w (2) Ex 2/1/2/20/20/-Machinin-C/46-11.p 10 ps 10/6 [col ひずしったいいはいれらいし ال كريسة الدين الدين المريسة الماسكة المتياه ١٩٠٤ على الماسكة 1010 J. 10 ell 10 0 Coft us ad Costa or series D'AFFO DW al pilo alling ن المراجي المارية

GOVERNMENT OF KHYBER PAKHTUNKHWA 1974 DIRECTORATE GENERAL POPULATION WELFARE POST BOX NO.235

Dated Peshawar the 24/11/2015

#### Office Order

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.

> (Director General) Population Welfare Department

#### Copy forwarded to the:-

- 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.
- PS to Advisor to Chief Minister, for Population Welfare Khyber Pakhtunkhwa.
- PS to Secretary Population Welfare Department, Khyber Pakhttinkhwa.
- PS to Director General, Population Welfare Department Khyber Pakhfunkhwa.
- Official concerned.
- P/F of the official concerned.
- F.No.4(21)/2015/Admn.

Deputy Director (Admn)

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

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

Dated: 26/11/2015.

Copy to:-

1. Accountant (Local) for information & n/action.

Official concerned.

3. I/C FWC concerned for information.

4. P/F of the official concerned.

ict-Population Welfare Officer,

2=Peshawar

Miss Sony Fur M 1/2 have Rano gashi  $T_0$ 

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 vide 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).

- 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

M. Usman Hand

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 reinstated 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.

8381 82/12/17

ATTESTED TO BE
TRUE COPY

W. Usman Khan Turlandi

M. Usman Khan Advocate

Dated: 21/12/2015

Peshawar

Appellant

Miss Sony

Ex- Family Welfare Worker

Population Welfare Deptt

K.P.K Peshawar



## NEXURE-J-GOVERNMENT OF KHYBER PAKHT POPULATION WELFARE DEPARTMENT

02<sup>nd</sup> Floor, Abdul Wali Khan Multiplex, Civil Secretariat, Peshawar

No. SOE (PWD) 1-3/2015/Inquiry/ 88/6-12 Dated Peshawar the 31<sup>st</sup> December, 2015

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 3.A. Degree were found fake.

SECTION OFFICER (ESTT)

#### Copy to the: -

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

PS to Secretary, PWD, Khyber Pakhtunkhwa, Peshawar.

Lo Comeron

SECTION OFFICER (ESTT)

Govt. of kh, ber Pakhtunkhwa Population Melfare 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:-

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

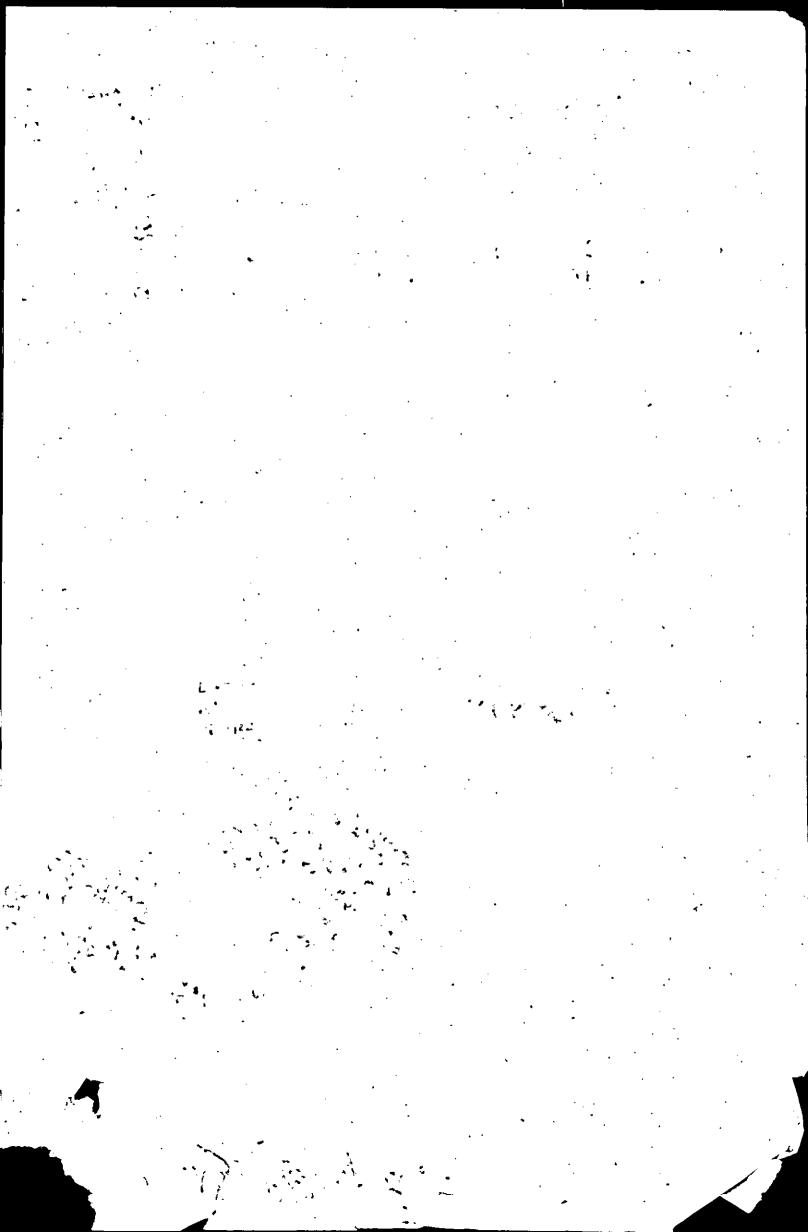
ALTESTED TO BE Usersa Khan Turksa NA. F. LL. S Advocate

bezpows.

Dy District Population Welfare Officer,

-25-Peshawar

بعدالت سے بی سے اسٹروس 2016 ومجازة دعوي かんけんりん جرم باعث تحريراً نكه مقدمہ مندرجہ عنوان بالامیں اپنی طرف سے واسطے ہیرہ ہی وجواب ہے ہی۔ مقدمہ مندرجہ عنوان بالامیں اپنی طرف سے واسطے ہیرہ کی وجواب ہیں۔ KPK-ST. L Theo ساره بلخامنان مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وكيل صاحب كوراضى نامه كرنے وتقر رثالث وفيصله برحلف ديئے جواب دہى اورا قبال دعوىٰ اور بصورت ڈگری کرنے اجراءاور وصولی چیک وروپیدارعرضی دعوی اور درخواست ہرشم کی تصدیق زرایں پردسخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یاڈگری یکطرفہ یا بیل کی برامدگ اورمنسوخی نیز دائر کرنے اپیل نگرانی ونظر ثانی و پیروی کرنے کا مختار ہوگا۔ ازبصورت ضرورت مقدمہ مذکور کے کل ماجزوی کا روائی کے واسطے اور وکیل ما مختار قانونی کوایئے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔اورصاحب مقرر شدہ کوبھی وہی جملہ مٰدکورہ بااختیارات حاصل ہوں گے اوراس کاساختہ پر داختہ منظور وقبول ہوگا دوران مقدمہ میں جوخر چہ ہرجانہ التوائے مقدمہ کے سبب سے وہوگا۔کوئی تاریخ پیشی مقام دورہ پر ہو یا حدسے باہر ہوتو وکیل صاحب یابند ہوں ATTESTED گے۔ کہ پیروی مذکورکریں ۔لہذا وکالت نامہ کھھدیا کہ سندر ہے۔ ACCEPTED مرعمان خال برلاتمي KPK-STE ایدوکیٹ بیٹا ورحانی کورٹ چوك بشتنگرى بشاورشى نون 2220193 Mob: 0345-9223239



# BEFORE THE HONORABLE SERVICE TRIBUNAL, PESHAWAR.

	Service Appeal No.163/2016		
Miss. Sony		(Appellant)	
	VERSUS		
1. Government of I	Khyber Pakhtunkhwa and Others	(Respondents)	

# Index

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DEPONENT
Sagheer Musharaf
Assistant Director (Lit)

## BEFORE THE HON'ABLE SERVICE TRIBUNAL, PESHAWAR

Appeal No. 163/2016

Miss. Sony......Appellant

#### <u>VERSUS</u>

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

#### **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; 1611/11/2015

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.

Deriver De 17/11

Assistant Secretary (Certificate)
Board of Intermediate & Secondary

Education Peshawar

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# GOVERNMENT OF KHYBER PAKHTI POPULATION WELFARE DEPARTMENT

02<sup>nd</sup> Fioor, Abdul W ıli Khan Multiplex, Civil Secretariat, Peshawar

To

No. SOE (PWD) 1-3/2015/Inquiry/ 22/6-12 Dated Peshawar the 31<sup>st</sup> December, 2015

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 3.A. Degree were found fake.

SECTION OFFICER (ESTT)

Copy to the: -

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

PS to Secretary, PWD, Khyber Pakhtunkhwa, Peshawar. 🤸

Comerine

SECTION OFFICER (ESTT)

Govt. of Rh; ber Pakhtunkhwa Population Velfare Department Office of the District Population Welfare Officer, Peshawar. Building No.5 Qafila Food 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.

PS to Secretary, PWD, KPK, Peshawar. 2.

3. Accountant General, KPK, Peshawar.

Accountant (local) for information & n/action. 4.

Mrs.Sony, Ex-FWW for information. *5*.

Personal file of the official concerned.

ALTESTED TO BE TRUE ?

Dy District Population Welfare Officer,

Peshawar

ion Khan Turlan**di** Nin T. L.L. S. r-dyocats.

Beaponage

# BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

In Ref; to S. Appeal No. <u>163</u>/ of 2016.

Miss: Sony	.Versus	Secretary F	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.

#### **GROUNDS.**

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.

Dated: 23/11/2016

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.

APPELANT.

Through

Muhammad Usman Khan Turlandi

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, 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

on

ATTESTED

192/11/16

# 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

de