

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

**Amended Service Appeal No.7499 of 2021**

Arshad S/O Umar Din, Beldar (Mate), Mardan Irrigation Division Mardan Resident of Street No. 13, Bar Kanday, Mughal Baz Road, Baghdada Mardan.....Appellant.

**VERSUS**

1. Superintending Engineer, Mardan Irrigation Circle, Mardan.
2. Executive Engineer, Mardan Irrigation Division, Mardan.....Respondents.

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VERSUS

1. Superintending Engineer, Mardan Irrigation Circle, Mardan.
2. Executive Engineer, Mardan Irrigation Division, Mardan.....Respondents.

**AMENDED SERVICE APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED ORDER DATED 29.12.2021 VIDE WHICH RESPONDED NO. 1 DISMISSED DEPARTMENTAL APPEAL OF THE APPELLANT AND MAINTAINED IMPUGNED ORDER DATED 10.11.202 OF RESPONDED NO. 2 VIDE WHICH APPELLANT WAS COMPULSORY RETIRE FROM SERVICE.**

**Para wise comments on behalf of respondents No. 1 & 2.**

**Khyber Pakhtunkhwa  
Service Tribunal**

Respectfully Sheweth:

Diary No. 15734  
Dated 12-09-24

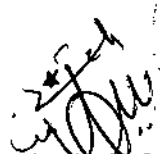
1. No comments.
2. Para 2 of the Appellant is correct to the extent that an enquiry was conducted against one Mr. Saleem Khan, Junior Clerk in Mardan irrigation office on account of receiving money from private person Mr. Hassan Gul for appointment of his son/relatives etc in irrigation department, the transaction of money/deal was testified by Mr. Arshad Ex-Beldar of irrigation department (Enquiry report & witness statement attached as **Annexure-A**), thus they misused their official position and irrigation office premises for deceiving innocent people for malafide intentions, both officials Mr. Saleem Khan, Junior Clerk and Mr. Arshad Beldar were compulsory retired from Government Service under E&D Rules 2011.
3. Already explained in Para-2.
4. No comments.
5. Para 5 is correct to the extent that an application was submitted to Superintending Engineer Mardan Irrigation Circle being the appellant authority, after thorough examination of all previous inquires, reply to show cause, complaints, etc the application was regretted by the appellate authority. (Letter Attached as **Annexure-B**).
6. Para 6 of the appellant is correct a writ petition No. 114-P/2021 was filled by the appellant but later on withdrawn by the appellant himself and file this instant appeal.
7. No Comments.
8. Para 8 of the appellant is wrong and baseless hence denied, that is all the Inquiry proceedings were carried out on merit and in strict accordance with E & D Rules 2011 by giving proper opportunity to the appellant of personal hearing and defending himself.


**GROUND:-**

- A. Para A of the appellant is wrong and baseless hence denied, that is all the Inquiry proceedings were carried out on merit and in strict accordance with E & D Rules 2011 by giving proper opportunity to the appellant of personal hearing and defending himself.
- B. In response to Para B of the Appellant it is stated that an Inquiry was conducted against one Mr. Saleem Khan, Junior Clerk in Mardan irrigation office on account of receiving money from private person Mr. Hassan Gul for appointment of his son/relatives etc in irrigation department, the transaction of money/deal was testified by the appellant Mr. Arshad Ex-Beldar of irrigation department (Mr. Arshad statement is attached as **Annexure-C**), thus they misused their official position and irrigation office premises for deceiving innocent people for malafide intentions.
- C. Already explained in Para B.
- D. In response to Para D, it is submitted that on the directions of Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar de novo inquiry was carried out against one Mr. Saleem Khan Junior Clerk and has been again charged with "Major Penalty" (De novo inquiry attached as **Annexure-D**).
- E. Already explained in Para D.
- F. Para F of the appellant is wrong and baseless hence denied, that is the appellant was served with proper charge sheet, show cause notice and notice for personal hearing.
- G. Already explained in Para F.
- H. Already explained in Para A.
- I. Para I of the appellant is wrong and baseless hence denied, that is the appellant was time and again given fair chance of personal hearing & to produce any evidence in support of his statement (Personal hearing notice attached as **Annexure-E**).
- J. Already explained in Para I.
- K. Already explained in Para I, furthermore the enquiry was conducted by responsible Government officer keeping in view all the circumstances, records, statements and evidences in light of E&D Rules 2011.
- L. Already explained in Para I.
- M. Already explained in Para A & I.
- N. Agreed, any further grounds on part of Respondents will be furnished during the arguments and proceedings.

**Prayer.**

Therefore, it is respectfully prayed that upon acceptance of these replies, the Honorable Tribunal may dismiss this Service appeal in the best public interest please.

  
Syed Anisad Amin Shah  
Executive Engineer  
Mardan Irrigation Division  
Mardan

  
Ghulam Ishaq Khan  
Superintending Engineer  
Mardan Irrigation Circle  
Mardan

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

**Amended Service Appeal No.7499 of 2021**

Arshad S/O Umar Din, Beldar (Mate), Mardan Irrigation Division Mardan Resident of Street No. 13, Bar Kanday, Mughal Baz Road, Baghdada Mardan.....Appellant.

**VERSUS**

1. Superintending Engineer, Mardan Irrigation Circle, Mardan.
2. Executive Engineer, Mardan Irrigation Division, Mardan.....**Respondents.**

**AFFIDAVIT**

I Syed Ahmad Amin Shah, Executive Engineer, Mardan Irrigation Division Mardan do hereby solemnly affirm and declare on oath that contents of the reply in Amended Service Appeal No. 7499 of 2021 filed by Arshad Ex-Beldar Vs Superintending Engineers and others are true and correct to the best of my knowledge and belief that nothing has been kept concealed from this Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar.

*The respondent neither been place reported nor their defense struck off/cost.*

**ATTESTED**



*Syed Ahmad Amin Shah*  
**Deponent**  
**CNIC No: 19101-2644208-9**  
**Mob: 03131313276**

**ENQUIRY REPORT REGARDING CHARGE SHEET / STATEMENT OF ALLEGATION  
SERVED TO MR. SALEEM KHAN JUNIOR CLERK ATTACHED TO MARDAN IRRIGATION  
DIVISION MARDAN**

I Engr. All-ur-Rehman Executive Engineer, Malakand Irrigation Division Malakand has been appointed as enquiry officer to conduct formal enquiry regarding charges levelled against Mr Saleem Khan Junior Clerk attached to Mardan Irrigation Division Mardan (Copy of order dated 11-11-2019 is enclosed as Annex-A).

The following charges with statement of allegation have been levelled against the accused official.

**A. CHARGE SHEET**


- i. That you made illegal transaction by taking money one Mr. Hassan Gul S/O Sahib Gul R/O Kass Koroona District Mardan for appointment of his son and other relatives. The deal was testified by one Mr. Arshad All Beldar of Irrigation Department. That you misused of your official position and Irrigation office premises for deceiving innocent people for malafide intentions.
- ii. By reason of the above you appear to be guilty of corrupt practices and misconduct under the Khyber Pakhtunkhwa Govt servant (E&D Rules 2011) and have rendered your self liable to all or any of the penalties specified in Rule-04 of the rules IBID.

**B. STATEMENT OF ALLEGATION**

- i. That you made illegal transaction by taking money one Mr. Hassan Gul S/O Sahib Gul R/O Kass Koroona District Mardan for appointment of his son and other relatives. The deal was testified by one Mr. Arshad All Beldar of Irrigation Department.
- ii. That you misused your official position and Irrigation office premises for deceiving innocent people for malafide intentions.

**ENQUIRY PROCEEDING**

- I. Mr. Saleem Khan Junior Clerk Mardan Irrigation Division Mardan and the Complainants were directed to attend the office of the undersigned on 19-12-2019 and 20-12-2019 respectively vide this office No.2922/3.E. dated 16-12-2019 (Copy of letter dated 16/12/2019 is enclosed as Annex-B).
- II. A questioner were properly served upon the accused official for his clarification and submission of detail report of the matter to the enquiry officer (Copy of questioner is enclosed as Annex-C)
- III. The accused official visited this office on 19-12-2019 at 02:00 PM and recorded a comprehensive statement as per questioner served upon him, wherein the accused official stated that he is serving in the department of Irrigation since 1996 and working in Mardan Irrigation Division Mardan w.e.f.01-04-2009. The accused official also stated in his statement that, he never known to Mr. Hassan Gul, but he was closed friend of

  
EXECUTIVE ENGINEER  
MARDAN IRRIGATION DIVISION  
MARDAN

Mr. Arshad Ali Beldar of Mardan Irrigation Division Mardan and they both were jointly visiting my office in routine, due to their frequent visits to my office, he in hi was created with Mr. Hassan Gul. During this time, my father was seriously ill and cash flow problem was arisen, for which, I request to Mr. Arshad Ali Beldar for grant of Qarz i Hassana, who managed Rs.284000/- from his close friend Mr. Hassan Gul, wherein I returned the amount of Rs.250000/- time to time to the Complainant, however Rs.34000/- is still balance till this time against me. The accused official also stated that Mr. Arshad Ali Beldar is trying to black mail him and there by he levelled corruption charges against me (Copy of detail statement of the accused official is enclosed as Annex-D)

- iv. The statement of Mr. Hassan Gul S/O Sahib Gul were also recorded with his signature and thumb Impression, who stated that he was close friend of Mr. Arshad Ali Beldar and stated that his Sons were jobless, for which Mr. Arshad Ali Beldar arrange to meet me with Mr. Saleem Khan Junior Clerk, during the discussion Mr. Saleem Khan demanded the following:
  - a. For appointment of the Post of Junior Clerk, Rs.350000/- was agreed to be paid to the accused official, wherein advance of Rs.100000/- was paid to the accused official.
  - b. For appointment of the Post of Beldar, Rs.160000/- was agreed wherein advance of Rs.60000/- was paid to the accused official.
  - c. For the Auction of vehicles Rs.14000/- was agreed, (Photocopy of the written transaction of the accused official provided by the complainant, is also enclosed as Annex-E).

As per the net shall statement of Mr. Hassan Gul (Complainant), A sum of Rs.270000/- is balance against Mr. Saleem Khan Junior Clerk which is to be return, wherein Rs.14000/- is also balance to be return in the auction of vehicle (Statement of the Complainant is enclosed as Annex-F).

- v. The statement of Mr. Arshad Ali Beldar was also recorded, who sated that he has paid Rs.100000/- to Mr. Saleem Khan Junior Clerk taken from Mr. Hassan Gul for appointment of his son, but after lapse of 5-6 months period, the appointment was not matured and the accused official return Rs.100000/- to Mr. Hassan Gul, Mr. Inam Beldar is the eye witness of returned amount of Rs.100000/- to the complainant. Mr. Arshad Ali Beldar denied the other transactions carried out between the accused official and Mr. Hassan Gul (Complainant) (Statement of Mr. Arshad Ali Beldar is enclosed as Annex-G).

**FINDINGS.**

- 1. There is contradiction in the statements of accused official, Complainant and Mr. Arshad Ali Beldar. All the statements are not matching with each other. But seems malifed intentions from all sides.


*[Signature]*  
EXECUTIVE ENGINEER  
MARDAN IRRIGATION DIVISION  
MARDAN

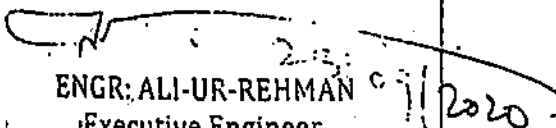
2. The accused official is neither appointing authority nor member of the Departmental Promotion / Selection Committee for such like appointments / promotions.
3. The accused official could not produce any evidence or medical record of the illness of his father.
4. The financial transaction between the parties seems to be based on ulterior motives.
5. Mr. Arshad Ali Beldar is, also seems to be the beneficiary of the mentioned transactions after maturity of the Class-IV appointments.
6. Both the officials are involved in the definition and creating bad name for the Irrigation Department.
7. The charges leveled against the officials has been established based on the statements of the parties.

### CONCLUSION

As the accused official and Mr. Arshad Ali Beldar are seems to be involved in mal practices and corruption, The charges leveled against the accused officials has been proven. Mr. Arshad Ali Beldar is also equally involved with the accused official.

It is therefore suggested that Major Penalty under Rule 4(b)(ii) of E&D Rules 2011 may be imposed upon both the official, i.e Mr. Saleem Khan Junior Clerk and Mr. Arshad Ali S/O Umar Din Beldar for creating bad name for the Department.

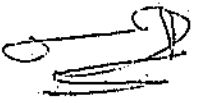
  
EXECUTIVE ENGINEER  
MALAKAND IRRIGATION DIVISION  
MARDAN

  
ENGR. ALI-UR-REHMAN  
Executive Engineer,  
Malakand Irrigation Division,  
Malakand

CNIC # 16101-1277207-3

نامہ علی سالار خان لودھی ڈیرہ

مستحقان علی سالار خان



28/12

تاریخ 28/12/2018ء کو ڈیرہ ناران میں منعقد ہونے والے جلسے میں شریک ہونے والے ہونے کی وجہ سے اس کی ایک کاپی جی آر اے کو پیش کی جا رہی ہے۔

اس میں درج ذیل ناموں کے ساتھ رقمیں درج ہیں:

- 1. علی سالار خان لودھی 14000/-
- 2. محمد علی لودھی 16000/-
- 3. اسحاق علی لودھی 35000/-
- 4. ... 60000/-
- 5. ... 30000/-
- 6. ... 50000/-

اس کے علاوہ اس کی ایک کاپی ڈپٹی ڈائریکٹر، ڈیرہ ناران کو بھی پیش کی جا رہی ہے۔

اس کی ایک کاپی ڈپٹی ڈائریکٹر، ڈیرہ ناران کو بھی پیش کی جا رہی ہے۔





OFFICE OF THE SUPERINTENDING ENGINEER  
MARDAN IRRIGATION CIRCLE, MARDAN.

Phone & Fax No. 0937-9230194

Email: [mardan\\_irrigation\\_circle@govt.punjab.gov.pk](mailto:mardan_irrigation_circle@govt.punjab.gov.pk)

[mardanirrigationcircle@gmail.com](mailto:mardanirrigationcircle@gmail.com)

No. 2976 /155-M,  
To

Dated Mardan the 29 /12/2020

The Executive Engineer,  
Mardan Irrigation Division,  
Mardan.

Subject: - APPLICATION / REPRESENTATION OF MR. ARSAHAD ALI DATED 12.11.2020

Reference:- Your office letter No. 2528/2-E(G), dated 01/12/2020

The Inquiry Reports, Documents and Statements attached with the Preliminary Inquiry as well as Formal Inquiry and reply to the Show Cause Notice were examined by the undersigned in capacity of Appellate Authority and the subject noted Application / Appeal against the imposition of Major Penalty of "Compulsory Retirement" imposed vide office order No.2362/2-E(G), dated 10/11/2020 being not-worth consideration is hereby regretted.

The Ex-official Mr. Arshad Ali may please be informed accordingly.

  
Superintending Engineer

Copy forwarded to The Chief Engineer (North), Irrigation Department, Peshawar  
for information.

  
EXECUTIVE ENGINEER  
MARDAN IRRIGATION DIVISION  
MARDAN

Superintending Engineer

بیان کیا۔ کہ حسرت علی اور گلزار صاحب نے آپ لاکھ روپے

ارشد کے ذمہ داری پر مسلمہ بالو کو کرائے سرکاری سٹارٹ اپ  
پرست ارشد حوالہ لکھے۔ کثیر بتایا جا رہا ہے کہ گورنر نے باوجود  
تمام بین جوائنٹ مسلمہ بالو نے دوست ارشد مذکورہ ایک لاکھ  
روپیہ حسرت علی کو واپس کیا اور اس معاوضہ واپسی کا

انتظام سلیوار گواہ ہے۔  
باقی اگر مسلمہ بالو اور حسرت علی نے کوئی اسباب لین دین  
کیا ہے تو مجھے اس بارے کوئی معلوم نہیں ہے۔  
بیان پر شکرا من کر دوست مسلمہ بالو کو



ارشد

العبد

CNIC # 16101-8362055-9

ارشد ولد عمر دین

کنڈ محلہ لغڑاہہ درکنڈی

منزل باز روڈ مردان

البرقہ 28/12/89

CNIC # 16102-8814208-5

گواہ

عمر دین  
العبد  
تسریر ولد حاج محمد

کنڈ کوہر گروہی



Signature of Sub Divisional Officer

Sub Divisional Officer  
Mardan Irrigation Sub Division,  
Mardan.

EXECUTIVE ENGINEER  
MARDAN IRRIGATION DIVISION  
MARDAN



OFFICE OF THE SUPERINTENDING ENGINEER  
MARDAN IRRIGATION CIRCLE MARDAN

PHONE NO 0937 - 9230194  
mardan\_circle@yahoo.com

No. 1549/10/2-E,

Dated Mardan the 16/10/2023

**OFFICE ORDER**

In compliance of the Khyber Pakhtunkhwa Services Tribunal Peshawar Judgment dated 30.05.2023, Service Appeal No. 3244/2021 titled "Saleem Khan Ex-Junior Clerk, Mardan Irrigation Division Mardan V/S Chief Engineer (South) Irrigation Department Peshawar" De-novo enquiry was conducted vide this office order No.909/50-E dated 06/06/2023. As per said De-novo Enquiry, the enquiry committee did not agree with the stance and grounds in defense of the official, he presented.

NOW, THEREFORE, in exercise of the powers conferred on me under E&D Rules 2011, the undersigned being Competent Authority do hereby agree with the findings of the committee for imposition of major penalty of "Compulsory Retirement" in respect of Mr. Saleem Khan Ex-Junior Clerk from Government Services. This is pertinent to mention that before the De-novo enquiry the official has already been charged for Compulsory Retirement.

  
SUPERINTENDING ENGINEER

**Copy to the:-**

1. Secretary to Govt. of Khyber Pakhtunkhwa Irrigation Department Peshawar for information please.
2. Accountant General Government of Khyber Pakhtunkhwa Peshawar for information please.
3. Registrar, Services Tribunal Khyber Pakhtunkhwa Peshawar for information please.
4. Chief Engineer (North) Irrigation Department Khyber Pakhtunkhwa Peshawar for information please.
5. Chief Engineer (South) Irrigation Department Khyber Pakhtunkhwa Peshawar for information please.
6. Executive Engineer Mardan Irrigation Division Mardan with reference to his enquiry report letter No. 1445/9-EG dated 01.09.2023 and Executive Engineer Malakand Irrigation Division Malakand (being enquiry members). This is with reference to submission of De-novo Enquiry report, for information please.
7. Office Superintendent (Local) for information please.
8. Ex-Official Concerned.

  
EXECUTIVE ENGINEER  
MARDAN IRRIGATION DIVISION  
MARDAN

  
SUPERINTENDING ENGINEER

**ENQUIRY REPORT IN RESPECT OF SALEEM KHAN JUNIOR CLERK, ATTACHED TO MARDAN  
IRRIGATION CIRCLE MARDAN**


The brief facts of the subject enquiry is that a complaint was lodged against the official (copy attached as Annex-A) by a private individual regarding corruption and male practices by him as government servant. Proper preliminary enquiry was ordered by the competent authority (Superintending Engineer, Mardān Irrigation Circle, Mardān) and after detail hearing and recording of statements of both parties the case was recommended for final enquiry (copy of enquiry report is attached as Annex-B). The competent authority again ordered final enquiry which was conducted and after detail hearing & perusal of record he was recommended for major penalty, details attached as (Annex-C). The competent authority upon the receipt of final enquiry issued show cause notice (copy attached as Annex-D) and after proper hearing he was compulsory retired from government service (copy attached as Annex-E). The official also submitted a departmental appeal to Chief Engineer (South), Irrigation Department, Peshawar which was rejected (copy attached as Annex-F). Consequently the official approached the Service Tribunal for remedy. The Service Tribunal ordered restoration for Denovo Enquiry & hearing him again (copy attached as Annex-G). The official was accordingly reinstated by the competent authority (Superintending Engineer, Mardān Irrigation Circle, Mardān) for Denovo Enquiry (copy attached as Annex-H) and constituted a committee for hearing the case a fresh (copy attached as Annex-I). Proper questionnaire was prepared and issued by the enquiry committee to the official duly served upon him but he failed to respond (Copy attached as Annex-J). Accordingly a notice was issued for personal hearing (copy attached as Annex-K) to which he responded and appeared before the committee and his statement recorded (copy attached as Annex-L).


**Findings:**

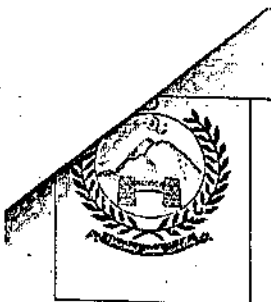
1. He was properly heard during preliminary enquiry & final enquiry as well as during show cause notice as evident from the perusal of record as attached above.
2. His present statement also shows that he was properly heard but appealing for mercy.
3. All the enquiry reports are crystal clear and full proof evidence against the official.

**Conclusions:**

In light of the above the enquiry committee therefore recommends major penalty.

  
Engr. Syed Ahmad Amin Shah  
Executive Engineer  
Mardān Irrigation Division

  
Engr. Imroz Khan  
Executive Engineer



OFFICE OF THE EXECUTIVE ENGINEER  
MARDAN IRRIGATION DIVISION MARDAN

[xenirmdn95@gmail.com](mailto:xenirmdn95@gmail.com)

FAX  
0937-9230195

No. 2066/2-EG,  
To


Dated Mardan the 07 /10/2020

✓ Mr. Arshad Ali, Beldar  
Mardan Irrigation Sub Division,  
Mardan

Subject: - SHOW CAUSE NOTICE

The enclosed Show Cause Notice is hereby served upon for necessary action at your end, Please acknowledge receipt of the show cause notice.

Encl: As Above

  
EXECUTIVE ENGINEER,  
(Ph: No: 9230195)

Copy forwarded to the Superintending Engineer, Mardan Irrigation Circle Mardan with reference to his office No. 2107/75-E, dated: 05-10-2020, for favour of information, please.

  
EXECUTIVE ENGINEER  
MARDAN IRRIGATION DIVISION  
MARDAN

/  
EXECUTIVE ENGINEER,  
(Ph: No: 9230195)

## SHOW CAUSE NOTICE

I Engr: Syed Ahmad Amin Shah Executive Engineer, Mardan Irrigation Division, Mardan, being competent authority, under the Khyber Pakhtunkhwa Govt: servants (E&D) Rules 2011 in pursuance of Superintending Engineer Mardan Irrigation Circle Mardan letter No.2107/75-E, dated 05-10-2020 do hereby serve you, Mr. Arshad Ali Beldar presently serving in Mardan Irrigation Sub Division, Mardan.

1. That consequent upon completion of the inquiry conducted against Mr. Salim Khan Junior Clerk attached to Divisional Irrigation office Mardan, you have also recorded your statement in the matter, while probing into by the Enquiry Officer has also found you guilty and clearly involved in mail practice, therefore you are being given the opportunity of personal hearing.
2. On going through the conclusion of the inquiry report that your action tantamount involvement in mail practices and corruption.
3. Now, the Enquiry Officer (Executive Engineer, Malakand Irrigation Division Malakand) having considered the charges leveled against you, as proven, received with Superintending Engineer Mardan Irrigation Circle Mardan letter No.2107/75-E, dated 05-10-2020, as exercise of the powers under Rules-4 (b) (ii) of Khyber Pakhtunkhwa (E&D) Rules 2011, was pleased and recommended/proposed imposition of the major penalty of "**Compulsory Retirement from service**" with immediate effect.
4. You, are therefore, required to show cause, as to why the aforesaid penalty should not be imposed upon you and also intimate, whether you desire to be heard in person.
5. If no reply to this show cause notice and additional defense in writing (if any) is received within 10 days of its delivery, it shall be presumed that you have no defense to put and in that case an ex -party action shall be taken against you.

  
EXECUTIVE ENGINEER  
MARDAN IRRIGATION DIVISION  
MARDAN

  
Executive Engineer  
Mardan Irrigation Division  
Mardan

Reply to show cause notice no. 2066/2-EG, dated 07.10.2020

**Detailed reply / comments**

While referring to the stated enquiry against Mr. Saleem Khan Junior Clerk, the replies are as under:-

**A: Charge Sheet**


- i- I testify to the extent that the transaction has been made good in between them.
- ii- Does not relates with me

**B: Statement of Allegation**

- i- I have testified the transaction between the mentioned persons to the extent that it has taken place in between the mentioned persons while I am not being the source of transaction stated in this para.
- ii- No reply as does not relate to me.

**ENQUIRY PROCEEDING**

- i- Does not relate to me.
- ii- As the same does not speak about me, hence no comments.
- iii- That neither Mr. Saleem Khan Junior Clerk is my friend nor Mr. Hassan Gul is my friend and even I do not know Mr. Hassan Gul. I have never received any amount from Hassan Gul (As he is unknown to me). Similarly not paid any amount to Mr. Saleem Khan Junior Clerk as I know him just to the extent that he is clerk in our office and is not my friend.
- iv- False, that neither Mr. Hassan Gul is my friend nor I know him. Besides that I know nothing about any discussion or deal in between the mentioned persons.
- v- False to the extent that the transaction has never been made by me. However, I have seen them of giving and taking some amount while I were sitting with my friend Mr. Malak Gulzar resident of Par Hoti who may be enquired in this regard.

  
EXECUTIVE ENGINEER  
MARDAN IRRIGATION DIVISION,  
MARDAN

Hence it is requested that as there is no enquiry against me and the dragging of mine in this mere on supposition and misunderstanding my statement is against law and justice.

I, therefore, request to please exonerate me from any nature of penalty.

**Further reply to the show cause notice**

In the subject matter, it is stated that I am an illiterate person and cannot read and my statement has been misunderstood as I have never received any amount from Mr.Hassan Gul and and nor made any payment to Mr.Saleem Khan Junior Clerk. I ever do not know Mr.Hassan Gul but I were sitting with my friend Malak Gulzar resident of Par Hoti when Mr. Hassan Gul handed over a bundle of currency notes of Rs.1000-/. Which I presumed to Rs. 100000/-. In the meanwhile Malak Gulzar asked me about the identification of Mr.Saleem which I testified as Junior Clerk in our office.

Hence, I may please be excluded from the penalty as mentioned in the charge sheet/recommended by enquiry officer.

I heard and found correct.

Yours Obediently

ارشاد

ARSHAD ALI

Beldar Mardan Irrigation Division,  
Mardan

  
EXECUTIVE ENGINEER  
MARDAN IRRIGATION DIVISION  
MARDAN







OFFICE OF THE EXECUTIVE ENGINEER

MARDAN IRRIGATION DIVISION, MARDAN.



0937-9230195

No. 2186 /2-EG,  
To


Dated Mardan the 20 / 10 /2020

Mr. Arshid Ali Mate  
Mardan Irrigation Sub Division  
Mardan

Subject: - PERSONAL HEARING IN RESPONSE OF REPLY TO SHOW CAUSE NOTICE.  
Reference: - This office letter No. 2066/2-EG, dated 07-10-2020

In response to show cause served upon you vide above-quoted reference letter, you Mr. Arshid Ali attended this office on 12-10-2020 for personal hearing and accordingly heard. You have also furnished written reply on 16-10-2020. However you are granted another opportunity of personal hearing under the E & D rules 2011, so if you desire, you may attend office of the undersigned on 27-10-2020 at 11:00 AM for personal hearing.

Encl: - [Inquiry report]

  
EXECUTIVE ENGINEER

Copy to the: -

1. Superintending Engineer Mardan Irrigation Circle Mardan for favour of information, please.
2. Sub Divisional Officer Mardan Irrigation Sub Division Mardan for information.

  
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MARDAN IRRIGATION DIVISION  
MARDAN

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21/10/2020