

# DISTRICT EDUCATION OFFICER (MALE) DERA ISMAIL KHAN

Tel. 0966-9280131 e mail: emisdikhan.yahoo.com

| 21766- | 21767 |
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|--------|-------|

°.\_\_\_\_\_/DEO(M)B&AO

Dated DIKhiyi the 19/// 2014

To.

 Mr. Qamar Zaman, (Chairman) Principal, GHS Prova, DIKhan.

2) Mr. Jamal Ahmad Mirza, (Member) Headmaster, GHS Behari Colony, DIKhan.

Subject:

ENQUIRY

You are hereby nominated to conduct an enquiry against fraudulent drawl of Rs.145,000/- on the part of one Mr. Muhammad Younis Class-IV Servant and submit your findings within 15 days for further necessary action under the relevant rules.

## The Enquiry Committee is required to thrash out the following aspects:

1- To verify his first appointment order.
2- To verify charge report day 1.10 cm.

2- To verify charge report dated 10-04-2014 having alleged take signature of 1000 & official stamp.

When pointed out such irregularities he gets the DDO code changed from Middle to High (GHSS Mandhra Kalan) while no LPC etc has been issued by the DDO of Middle section.

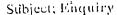
4- The Ex-DDO Middle has stopped his pay but the present DDO has released his pay and he has drawn Rs.145,000/- fraudulently.

For any assistance the committee may contact Account Branch of this office.

District Education Officer
(Male) DIKhan

## The DEO(Male)

#### **E&SE DIKhan**



#### Memo,

Reference enquiry No 21766-67of dated 10/11/2014 was assigned to the under signed. A detailed inquiry was held and findings of the inquiry are hereby submitted in your worthy respect.

- Appointment örder No 1622-29 of dated 10/04/2013 does not exist in the desputch register.
- 2. Charge report of 10/04/2013 shows a fake stamp with designation of Dy: Education officer Dera Ismail Khan. This post even does not exist at all.
- Ex-DDO GHSS Mandran Kalan Mr. Zawar Hussain Shah activated the monthly salary of Mohammad Younis without any LPC. The detailed statements of the clerks in GHSS Mandran Kalan is annexed.(Annexure A,B)
- Statement submitted by the accountant Mr. Muhammad Aftab Dy: DEO Mr. Rambail Khandeclared that they have not been involved in the activation of salary of Muhammad Younis or hisarrears. DDEO declared that he had not issued pay release order in respect of M. Younis class-iv.(Annexure C,D).
- Muhammad Younis stated in his on-oath statement that he appeared before the present DDEO for activation of pay and arrears but Dy:DEO directed that pay activation is responsibility of the office.
  - Muhammad Younis in his statement declared that he sought the help of M. Hashim (his relative) for activation of pay. In this regard Mohammad Arshad J/C DEO(F) DIKhan fully facilitatedM.Hashim to release the salary (Annexure E)

#### Conclusion:-

All the relevant letters of Muhammad Younis class-iv are fake and bogus. The department has nothing to do with the letters.

The stamp used throughout the pay activation process is fake.

#### Decision:-

1. Muhammad Younis be directed to deposit Rs 145921/- in the exchequer and be warned in furture.

Department should initiate an inquiry against the two Government employees as pointed out by the statement of Muhammad Younis class-iv.

3. Pay active source form and arrears bill had been passed by the District Accounts office DIKhan under wrong designation shown in the stamp.(Annexure F,G,H) The concerned DAO staff DIKhan must be warned to be conscious in all aspects while passing/ feeding the bills of the Government servants.

Qamar uz Zaman

Principal

GHS Parova DIKhan

Jamal Ahmad Mirza

Head Master

Behan Colony DIKhan

.O Dahotar us hereby It in BPS-01 his father of NV/FF ediate effect Honor'able wily in term. ay and 10% cribed by th ) termination without prio resignation. . All expense appointmer candidate i the Medica Sd/-District Education Officer (Male) Dera Ismail Khan

DEO(M)/Class-IV Dated DIKhan the 10/11/2013

- The Deputy Commissioner, DIKhan.
- The Deputy Listrict Education Officer (Male), Dera Ismail Khan.
- The District Comptroller of Accounts, Dera Ismail Khan.
- Official Concerned.
- Office File.

## BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 353/2018

Rambil Khan

VS

Govt: of KP.

## REJOINDER ON BEHALF OF APPELLANT

## RESPECTFULLY SHEWETH:

## **Preliminary Objections:**

(1-15) All objections raised by the respondents are incorrect and baseless. Rather the respondents are estopped to raise any objection due to their own conduct.

#### **FACTS:**

- 1. First portion of para 1 is admitted correct, hence no comments, while the rest of the para is incorrect hence denied.
- 2. Incorrect. The appellant did not sign the salary bill of Muhammad Younis. Moreover the claim was not signed by the appellant and submitted to DAO D.I Khan.
- 3. Incorrect. No proper opportunity was provided to the appellant during the inquiry proceeding. Moreover Muhammad Younis gave himself contradictory statement in different inquiries conducted on the issue. (statements of Muhammad Younis Khan statements are attached as Annexure-R-1)
- 4. Incorrect. The appellant submitted reply to show cause notice in which he denied all allegations.
- 5. Incorrect. The appellant was removed from service which was modified to compulsory retirement without conducting regular inquiry which is violation of law and rules.
- 6. Pertain to record, however the removal order was modified to compulsory retirement on his review petition and there is no need of further departmental appeal as per rules and law.
- 7. Pertain to record, however the grievance of the appellant was not redressed as the appellant filed the instant appeal for reinstatement and not for modification of removal order to compulsory retirement.
- 8. Incorrect. The removal order was modified to compulsory retirement on his review petition and there is no need of further departmental appeal as per rules and law.

9. Incorrect. The appellant has good cause of action to file the instant appeal which is liable to be accepted on the following grounds.

#### **GROUNDS:**

- A. It is correct that the removal from service was modified into compulsory retirement on the review petition of the appellant, but that order is also against the law, rules, material on record, therefore not tenable and liable to be set aside. Moreover, there is no need of further departmental appeal against the order dated 12.04.2018 as per rules and law.
- B. Incorrect. While para B of the appeal is correct.
- C. Incorrect. No proper opportunity of defence was provided to the appellant during the inquiry as neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination.
- D. Not replied according to para D of the appeal. Moreover para D of the appeal is correct.
- E. Incorrect. The appellant did not release the salary of the appellant. Moreover the Muhammad Younis gave himself the contradictory statements which shows the malafide of Muhammad Younis.
- F. Incorrect. While para F of the appeal is correct.
- G. Incorrect. The appellant did not sign the salary bill of Muhammad Younis and has no role in the issue.
- H. Incorrect. While para H of the appeal is correct.
- I. Legal.

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

Through:

APPELLANT

M. ASIF YOUSAFZAI ADVOCATE SUPREME COURT

<u>AFFIDAVIT</u>

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.

DEPONENT

RATE ) الله العين ذيك خور را منل صاحب مي يال د فنتر دني كم مير 3 ناتور بناديل - البرول نے بهر تربير دينيز کا کام ہے Nest - 24/2000 1000 5 2583113 m 201 july 20 J1/1/2 Bles as a July 2000 - 1/2/19 Jesthin 11 m Joe pies e just 3.1 stes en 20/2/13/11/20 10/bs e sine 3) has som is ? 27 des judices 12/03-5788584.5- 12/03-57

Kity Hilla - 10 السلامعبيكم: آب نے 15 2-8-20 كومير سے خلاف انكوالمرة لی- جس میں بندہ المل بات سر ترسکا- میری قبریلی GMS وانا کھیارک سے ۱۶۲۵ مندهره فلال یاشم فلرک نے سرانی اور اُسی نے افاق نظ آسی سے مہری تخواہ جالو/جاری سرائی تھی۔ وہی ٹیرنسیل سے مرا سورس فارا درستخط کر ایا تفا۔ عدم عجم وفتر وي اي بعبع دباكيا- وبال مراك سيمير بقايا كا بالعالى جسم را بيل خان دُيني بي فيلو ر د عف - ميونكماريز مارک دی ای اورزنان ) ویره نے کھ سے سر سرالدہ کے سے ا وز آ ویزا ب ایر کارزی برابر کارزیک نوا-ار در فالمرز اور ا کاروست ہے۔ مڑل سکول سے بنقایا تنحواہ کی بنانے اور نفلا نے والاالمل بنده ادسته عکرک سے۔ جسمبی مبری عربی اور عبعدى كافائده الله إلياباكي-میربانی نرکه بچھ ، عال کیا جا تے۔ کالی مترون کارواتی: 8. Incorrect. The removal order was modified to compulsory retirement on his review petition and there is no need of further departmental

appeal as per rules and law.

#### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

S.A.# 353/2018.

#### **VERSUS**

#### PARAWISE COMMENTS FOR & ON BEHALF OF THE RESPONDENTS NOs: 1-4

#### Respectfully Sheweth,

#### The Respondents submit as under:-

#### **Preliminary Objections**

- 1. The appellant has got no cause of action/locus standi.
- 2. That the instant Service Appeal is badly time barred.
- 3. The appellant has concealed the material facts from this Hon'able Service Tribunal in the instant Service Appeal.
- 4. That the instant Service Appeal is based on mala fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 5. That the appellant is not entitled for the relief he has sought from this Hon'able Tribunal.
- 6. The appellant has filed the instant appeal with malafide intension just to pressurize the Respondent for gaining illegal service benefits.
- 7. That the instant appeal is against the prevailing law & rules.
- 8. That the Appellant has been treated as per law, rules & policy.
- 9. That the instant appeal is not maintainable in its present form.
- 10. That the appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 11. That the instant Service Appeal is barred by law.
- 12. That the impugned Notification dated 12.04.2018 is legally competent.
- 13. That the appellant has been found guilty by the enquiry officer on charges of illegal payment to ghost Class-IV without justification being a Drawing and Disbursing Officer.
- **14.** That the instant appeal is badly time barred.
- 15. The under Service Tribunal Rules, the appellant is supposed to file departmental appeal against the impugned notification dated 12.04.2018 whereas the appellant failed to do so, hence the instant appeals to be dismissed on this score above.

#### FACTS.

- 01. That Para-1 is correct to the extent that the appellant was working as Deputy DEO(Male) D.I.Khan, but rest of the Para is denied.
- 02. That Para-2 is incorrect & denied on the ground that salary bill of Mr. Muhammad Younas was signed by Mr. Rambail ex-DDO(M). D.I.Khan being DDO of Middle School. Furthermore, the Enquiry Committee / Officer collected original service and salary record of Muhammad Younas from D.A.O(D.I.Khan), it was confirmed that the claim was actually signed by Mr. Rambail Khan and duly submitted to DAO D.I.Khan which resulted in irregular drawl as mentioned in the Charge Sheet and statement of allegation.
- 03. Incorrect and denied that proper chance of defence was provided to the appellant, the said enquiry was conducted in very presence of the appellant and gave him proper opportunity of cross examination (Annex-A).

04. That Para-4 is incorrect and denied on the grounds that the appellant has been found guilty of illegal payment of monthly salary to the said ghost Class-IV being a DDO. Hence Departmental proceedings under the E&D Rules, 2011 have been adopted against the appellant by the Department by observing all codal formalities prior to the issuance of impugned Notification No.SO(S/M)E&SED/4-17/2015/Rambel Khan DDEO(M) D.I.Khan dated 12.04.2018, issued by Respondent No.1. Hence the plea of the appellant

is without any legal justification.

- 05. That Para-5 is correct to the extent that in view of the Charge Sheet, statement of allegation & Show Cause notice, an enquiry was conducted through Competent Authority probing the alleged financial & Administrative irregularities & the appellant has been found guilty. Hence the impugned Notification which is legally Competent and is liable to be maintained in favour of the Respondents.
- 06. That Para-6 is correct to the extent that appellant / accused submitted a Review Petition before the Competent Authority against his penalty i.e. Removal from Service. In exercise of the power conferred under Section 17 of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules, 2011. The Competent Authority (Chief Minister Kpk) upon the review of the case is pleased to convert the major penalty of Removal from Service imposed upon Mr. Rambail Khan, Ex-Deputy DEO(M), D.I.Khan to major penalty of "Compulsory Retirement from Service". Furthermore, against the said notification, the appellant has not filed any Departmental Appeal.
- 07. As admitted that the review petition of the appellant was decided by the appellate authority / reviewable authority in which the major penalty of removal from service was converted into major penalty of compulsory retirement from service. Hence, his grievances are redressed.
- **08.** Incorrect and denied. That upon the review petition of the appellant, the Competent Authority pleased to convert the major penalty of "Removal from Service" imposed upon the appellant. Hence, the appellant original appeal became in fructuous. It is also pertinent to mention here that the appellant has not filed any departmental appeal before Competent Authority and the said amended appeal filed after laps of 06-months.
- **09.** That Para-09 is incorrect. The act of the Respondent Department with regard to the impugned Notification dated 12.04.2018 against the appellant is within legal sphere and is liable to be maintained in the interest of justice and the main appeal along with amended appeal to be dismissed inter-alia on the following grounds.

#### **Grounds**;

A. It is correct to the extent that appellant / accused submitted a Review Petition before the Competent Authority against his penalty i.e. Removal from Service. In exercise of the power conferred under Section 17 of the Khyber Pakhtunkhwa Government Servant (Efficiency and Discipline) Rules, 2011. The Competent Authority (Chief Minister Kpk) upon the review of the case is pleased to convert the major penalty of Removal from

- Service imposed upon Mr. Rambail Khan, Ex-Deputy DEO(M), D.I.Khan to major penalty of "Compulsory Retirement from Service". Furthermore, against the said notification, the appellant has not filed any Departmental Appeal.
- B. Incorrect and denied. As already explained in Para-02 that it is incorrect & denied on the ground that salary bill of Mr. Muhammad Younas was signed by Mr. Rambail ex-DDO(M). D.I.Khan being DDO of Middle School. Furthermore, the Enquiry Committee / Officer collected original service and salary record of Muhammad Younas from D.A.O(D.I.Khan), it was confirmed that the claim was actually signed by Mr. Rambail Khan and duly submitted to DAO D.I.Khan which resulted in irregular drawl as mentioned in the Charge Sheet and statement of allegation.
- C. Incorrect and denied that proper chance of defence was provided to the appellant, the said enquiry was conducted in very presence of the appellant and gave him proper opportunity of cross examination.
- D. That during the course of action Mr. Taus Khan(M) Karak visited GHSS Mandhra Kalan on dated 23.04.2014 and directed the Principal concerned to immediately relieve the accused class-IV Muhammad Younas resultantly the accused was relieved and his pay was stopped on the verbal direction of Ex-DEO(M)Khan. However, no further disciplinary proceeding was initiated by the competent authority due to unknown reason.
- E. Incorrect and denied. The accused class-IV Servant was heard in person. He verbally admitted that he has not performed duty at GMS Wandar Yarak for the reason that no staff member was present there. However transfer to GHSS Mandra Kalan he has performed duty from 08-10-2013 to 23-04-2014 as revealed from attendance record of the said school. The accused further stated that the salary bill for the period from 01-12-2013 to 30-09-2014 was signed by Mr. Rambil Ex-DDO (M) D.I.Khan. He requested for Re-instatement and release of pay.
- F. Incorrect and denied. The District Accounts Officer, D.I.Khan provided original service and salary record of Muhammad Younas duly submitted by Ex-DDOs of DEO(M) DIKhan which was checked thoroughly and it was confirmed that the claim was actually signed by Mr. Rambail Khan and submitted to DAO DIKhan which resulted irregular drawl as mentioned in the charge sheet and statement of allegations. The DAO D.I.Khan also recorded his statement.
- G. As admitted by the appellant that the documents / letter of the concerned official i.e. Muhammad Younas Class-IV are fake and bogus and even than the appellant / Mr. Rambail Khan signed his claim of Pay /arrears and submitted to DAO D.I.Khan which resulted irregular drawl as mentioned in charge sheet and statement of allegations.
- H. Incorrect and denied. That the Competent Authority (Chief Minister, Khyber Pakhtunkhwa) after having considered the charges and evidence on record, inquiry report, explanation of the accused officer in response to the show cause notice and personal hearing granted to him by the Secretary Establishment Department on behalf of the Chief Minister Khyber Pakhtunkhwa on 16.10.2017 is of the view that the charges against the accused officer have been proved.

In view of the above made submission, it is prayed that this Honourable Tribunal may very graciously be pleased to dismiss the instant Service Appeal with cost in favour of the Respondent Department.

E&SF/Department.
Govt: of Khyber Pakhtunkhwa

Secretary
E&SE Department.

Govt: of Khyber Pakhtunkhwa

(For & behalf of Respondents No.1, 2 & 3)

#### **AFFIDAVIT**

I, Mr. Fazale Subhan, Section Officer (Lit-II) E&SE Department, Govt. of Khyber

Pakhtunkhwa, do hereby solemnly affirm and declare on oath that the contents of the instant

Parawise Comments are true & correct to the best on my knowledge & belief.

eponent



#### OFFICE OF THE COMMISSIONER, KOHAT DIVISION KOHAT

No. 10463/EA/Cmr-Kt

Dated Kohat Nov 2, , 2016

Тo

Mr. Feroz Hussain,

Senior Clerk, GHSS Mandhra Kalan, D.I Khan.

SUBJECT:

INQUIRY AGAINST M/S RAMBAIL KHAN, EX – DDEO (M) (NOW DOWNGRADED TO LOWER POST), TAUS KHAN, EX – DY DISTRICT EDUCATION OFFICER (NOW PRINCIPAL BS- 19 GHS NO. 5 D.I KHAN), SYED ZAWAR HUSSAIN SHAH, HEADMASTER GHS MITHAPUR, ATTA MUHAMMAD SUPD. DEO (M) OFFICE AND MUHAMMAD YOUNAS CLASS – IV, D.I KHAN.

Memo:

In connection with the subject Inquiry, you were directed to attend this office personally along with relevant record on 22-11-2016 (Tuesday) at 11:00 AM vide this office memo: No. 10388/EA/Cmr-Kt dated: 18-11-2016, however, you did not turn up for the same.

You are therefore, once again directed to attend this office personally alongwith all relevant record on 29-11-2016 (Tuesday) at 11:00 AM positively.

(MUSARRAT HUSSAIN)
COMMISSIONER, KOHAT DIVISION,
KOHAT.

Endst: No. & Date Even

Copy forwarded to the Secretary, Elementary & Secondary Education Deptt:, Govt: of Khyber Pakhtunkhwa, Peshawar.

COMMISSIONER, KOHAT DIVISION, KOHAT.

MSE

25011

DS (ESPA)

29.11.10. 38

SO(SM)

OFFICE OF THE COMMISSIONER, KOHAT DIVISION KOHAT

No. 10601 /EA/Cmr-Kt

Dated Kohat Dec: 08, 2016

Ti

The Secretary,

Elementary & Secondary Education Deptt:, Govt: of Khyber Pakhtunkhwa, Peshawar.

SUBJECT:

INQUIRY AGAINST M/S RAMBAIL KHAN, EX – DDEO (M) (NOW DOWNGRADED TO LOWER POST), TAUS KHAN, EX – DY DISTRICT EDUCATION OFFICER (NOW PRINCIPAL BS- 19 GHS NO. 5 D.I KHAN), SYED ZAWAR HUSSAIN SHAH, HEADMASTER GHS MITHAPUR, ATTA MUHAMMAD SUPD. DEO (M) OFFICE AND MUHAMMAD YOUNAS CLASS – IV, D.I KHAN...

Memo:

Pakhtunkhwa Order No. SO (S/M)/E&SED/4-17/2015/Syed Zawar Shah HM GHS Mithapur/171 dated: 08-08-2016, on the above noted subject and to say that in pursuance of the E&SE Deptt: Govt: of Khyber Pakhtunkhwa above referred Notification, the undersigned alongwith Mr. Saif-Ur-Rehman, Principal (BS-20), GHS No.1, Nowshera Cantt: conducted a formal inquiry in the subject matter.

Inquiry Report is enclosed herewith, please.

(MUSARRAT HUSSAIN) COMMISSIONER, KOHAT DIVISION, KOHAT.

Endst: No. & Date Even

Copy forwarded to the Mr. Saif-Ur-Rehman, Principal (BS-20), GHS No.1, District

Nowshera.

COMMISSIONER, KOHAT DIVISION, KOHAT.

ZIF /

2011

NOURY REPORT AGAINST MR.TAUS KHAN EX-DY:DEO(M) D.I.KHAN NOW DEO(M) KARAK. MR.RAMBAIL KHAN EX-DY:DEO(M) D.I.KHAN NOW H/M,GHS HEHAK DEKHAN,MR.ZAWAR HUSSAIN SHAH EX-DDO, GHSS MANDHRA ALAN NOW H/M,GHS DHARTIAN HARIPUR AND MR.ATTA MUHAMMAD EX-PUTT:DEO(M) D.I.KHAN NOW RETIRED REGARDING IRREGULAR DRAWL SOME GOVT EXCHEQUER ON ACCOUNT OF ARREAR OF PAY IN R/O MICHAMMA YOUNAS CLASS-IV.

#### PREAMBLE.

The competent authority has constituted the following enquiry committee vide office Notification No.SO(S/M)E&SED/4-17/2015/Syed Zawar Hussain Shah HM, GGS Mithapur/171 dated 08-08-2016 to conduct formal enquiry against the following officers for the charges mentioned in the charge sheet and statement of allegations already served upon the concerned Officers (Annex-A).

- 1- Mr. Taus Khan Ex-Dy: DEO(M) D.I. Khan now DEO (M) KARAK
- 2- Mr.Rambail Khan Ex-DY:DEO(M) D.I.KHAN now H/M,GHS Chehak D.I.KHAN,
- 3- Mr.Zawar Hussain Shah EX-DDO, GHSS Mandhra Kalan now H/M, GHS Dhartian Haripur.
- 4- Mr.Atta Muhammad Ex-Supdtt:DEO(M) D.I.KHAN now retired.

#### **ENQUIRY COMMITTEE**

- 1- Mr. Musarrat Hussain (PCS EG BS-20), Commissioner Kohat Division Kohat.
- 2- Mr. Saifur Rahman Principal (BS-20), GHS No.1 Nowshera Cantt:

#### **ALLEGATIONS**

Being DDOs unlawfully released pay and arrears of Muhammad Younas Class-IV for various periods which caused great loss to Govt exchequer.

#### TERMS OF REFERENCE OF ENQUIRY COMMITTEE

The aforesaid committee shall look into the matter, conduct formal inquiry for the charges mentioned in the charge sheet and statements of allegations already served upon the concerned Officers and submit recommendation/report to the competent authority.

#### **PROCEEDINGS**

In compliance with the above referred notification of the competent authority, the enquiry committee started the proceedings accordingly. The competent authority has already served statement of allegations and charge sheets upon the above named officers (Annex-B to M). All have submitted their replies to the enquiry committee (Annex-N to Q).

To find out the actual position the enquiry committee visited office of DEO (A1) Decisional Khan on dated 17-10-2016. The DEO (A1) Decisional Khan on dated 17-10-2016.

The concerned dispatcher also stated in black & white that the endstt No. of the same order is fake and not recorded in the dispatch register of DEO (M) D.I.Khan

The concerned Officers/Officials were directed to appear before the enquiry committee 22-11-2016 at Commissioner Office Kohat resultantly they were appeared except Feroz assain Shah & Riaz Swati Ex-DEOs (M) D.I.Khan, DAO D.I.Khan, S.Zawar Hussain Shah Ex-DO of GHSS Mandhra Kalan and Feroz Khan S/Clerk of the said school. Those who were appeared before the enquiry committee recorded their statements (Annex-V to A1).

The above named absent Officers/Officials were directed to appear before the enquiry committee on dated 29-11-2016 at Commissioner Office Kohat resultantly they appeared before the enquiry committee (Annex-A2). They also recorded their statements (Annex-A3 to A5).

#### FINDINGS.

The photo copies of relevant documents provided by the above named Officers were checked thoroughly and it was observed that:-

- 1- Muhammad Younas S/o Muhammad Nawaz resident of Dahother Kacha P/o Rangpur Shumali D.I.Khan was appointed against Chowkidar post at GMS Wanda Yarak D.I.Khan by DEO (M) D.I.Khan vide Endstt: No.1622-27/DEO (M)/Class-IV Dated 10-04-2013 (Annex-A6). The said order was invalid for the reasons that (i) there is no Chowkidar sanctioned posts in Middle Schools and (ii) there is no entry recorded of such appointment order in the dispatch register of DEO (M) Dera Ismail Khan as revealed from the available record and statement of despatcher (already annexed).
- 2- Mr.Muhammad Younas Class-IV has not performed duty at GMS Wanda Yarak D.I.Khan as revealed from the written statement of Head Master, GMS Wanda Yarak (Annex-A7). There are only two sanctioned class-IV Posts i.e Naib Qasid and Sweeper at GMS Wanda Yarak against which Mr.Abdur Rasheed Sweepera and Mr.Azizur Rahman NQ are working since the establishment of the school (Annex-A8).
- 3- The pay of Muhammad Younas Class-IV was not released/computerized well in time for the reason mentioned above. Source-1 for computerization of pay was submitted to DAO Dera Ismail Khan shown signed by DDO and countersigned by DEO (M) Dera Ismail Khan (Annex-9). His pay was computerized for the 1st time in 07/2013 (Annex-A10).
- 4- The accused Muhammad Younas Chowkidar, GMS Wanda Yarak was shown transferred mutually vice Mr.Zakaullah Class-IV of GHSS Mandhra Kalan D.I.Khan D.I.Khan by DEO (M) D.I.Khan vide endstt No.8403-7 dated 08-10-2013 (Annex-A11). The said transfer order is also invalid for the reason that (i) the signatory authority (DEO M D.I.Khan Mr.Taus Khan) has disowned the signature marked on the transfer order and (ii) the dispatch No. recorded on the said transfer order is fake and has not been recorded in dispatch register of DEO (N) D.I.Khan Mr.Taus Khan)

- 5- The DDO of GHSS Mandhra Kalan D.I.Khan Mr.Zawar Hussain Shah now Head Master, GHS Dartian Haripur has released his salary for the month of 10/2013 and 11/2013 without confirmation and issuance of LPC from the quarter concerned which is required being important accounts documents (Annex-A12). Mr.Zawar Hussain Shah Ex-DDO Mandra Kalan stated that he has signed the source documents for release of pay on the request of Feroz Khan S/Clerk of the said school. However Mr. Feroz Khan S/Clerk denied the statement of DDO Concerned.
- 6- Mr.Taus Khan Ex-DEO (M) D.I.Khan now DEO (M) Karak visited GHSS Mandhra Kalan on dated 23-04-2014 and directed the Principal concerned to immediately relieve the accused Class-IV Muhammad Younas resultantly the accused was relieved and his pay was stopped on the verbal direction of Ex-DEO (M) D.I.Khan (Annex-A13).
- 7- During the course of enquiry it was observed that though the accused was relieved from his official duty on dated 23-04-2014 but even then his salary of intervening period amounting to Rs.145000/- was prepared and submitted to DAO D.I.Khan shown signed by Mr.Rambail Khan Ex-DDO (M) D.I.Khan (Annex-A14 toA16). The DAO D.I.Khan passed the said arrear bill (Annex-A17). Though it was the responsibility of accountant as well as DDO concerned to point out the irregular drawl well in time but no recovery has so far been made from the accused. They further recorded the said amount in monthly expdt:statement for the month of 10/2014 (Annex-A18). However Mr.Rambail Khan Ex-DDO now H/M, GHS Mandhra Kalan has disowned the signatures marked on arrear bill as well as source forms as revealed from his statement (already annexed).
- 8- Apart from above mentioned facts, all the concerned DEOs/Dy:PTO /PTO Mr.Zawar Hussain Shah ex-DDO, GHSS Mandhra Kalan now I Dartian Haripur have disowned the signatures marked on Ser Muhammad Younas Class-IV Servant. No one is ready to accept t fraudulent drawl as well as maintenance of record.
- 9- The Accused Class-IV Servant was heard in person. He verbally adm performed duty at GMS Wanda Yarak for the reason that no staff r there. However after transfer to GHSS Mandra Kalan, he has perform 2013 to 23-04-2014 as revealed from attendance record of the said sc A29). The accused further stated that his salary bill for the period from 09-2014 was signed by Mr Rambail Khan Ex-DDO (M) D.I.Khan. I instatement and release of pay.
- The District Accounts Officer Dera Ismail Khan Provided original service and salary record of Muhammad Younas duly submitted by Ex-DDOs of DEO (M) D.I.Khan which was checked thoroughly and it was confirmed that the claim was actually signed and submitted by the concerned DDOs which resulted irregular drawl as mentioned in the charge sheet and statement of allegations. The DAO D.I.Khan also recorded his statement (Already Annexed).
- 11-Mr.Feroz Hussain Shah Ex-DEO (M) D.I.Khan now retired stated that he has issued the appointment order of the accused Class-IV servant on the direction of Mr.Qaisar Rasheed Judge Peshawar High Court (Already Annexed).

NB

- Mar Mawar Hussain now H/M, GHS Dartian Haripur stated in black & white that he has stated the source form of Muhammad Younas Class-IV for release of his pay.

Feroz Khan S/Clerk of GHSS Mandra Kalan stated that he has stamped the source form of Muhammad Younas C-IV prior to sign of DDO concerned (Already Annexed).

is worth mentioning to state that three enquiries have already been conducted against the cove named class-IV servant (Annex-A30 to A33). All the three enquiry committees have declared the first appointment order & transfer order as fake & bogus. Though his appointment order was issued under 25% reserved quota for the children of Class-IV servants as his father was retired from service. However no record was found at DEO (M) D.I.Khan.

During the course of enquiry, it was observed that supporting staff of establishment section and accounts section are fully involved in such fraudulent drawl. Disciplinary proceedings are required to be initiated against them under E&D Rules, 2011. However now they are trying to save their skin from any drastic action.

#### RECOMMENDATIONS.

In the light of above mentioned facts and documentary proof on record, the charges have been proved against the above named Officers. It is therefore recommended that:-

- 1- Major penalty may be imposed upon these Officers under E&D Rules, 2011.
- 2- Muhammad Younas Class-IV may be removed from service under E&D Rules,2011. The salary of absence period drawn fraudulently may be recovered and deposit into Govt treasury without further loss of time.
- 3- Disciplinary proceedings may be initiated against the concerned staff of Establishment Section and Accounts Section of DEO (M) D.I.Khan including Feroz Khan S/Clerk of GHSS Mandra Kalan D.I.Khan.

(MR.MUSARRAT HUSAIN KHAN)
(PCS EG BS-20), Commissioner Kohat Division.
Enquiry Officer.

(MR.SAIFUR RAHMAN)
Principal BS-20)/Enq Officer
GHS No.1 NSR Cantt:

# REGISTERED

# GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No.SO(S/M)E&SED/4-17/2015/Syed Zawar Hussain Shah&others/171
Dated Peshawar the February 17, 2017

17/9/017 2-00/M

Mr. Musarrat Hussain (*Chairman Inquiry Committee*), Commissioner Kohat Division, Kohat.

Subject: -

ORDER- INQUIRY AGIANST M/S RAMBAIL KHAN DY.DEO(M), TAUS KHAN DY.DEO(M), SYED ZAWAR HUSSAIN SHAH, HEADMASTER GHS MITHAPUR, ATTA MUHAMMAD SUPERINTENDENT AT THE DEO(M) OFFICE AND MUHAMMAD YOUNAS CLASS-IV D.I.KHAN.

Dear Sir.

I am directed to refer to your letter No.10601/EA/Cmr-Kt dated 08-12-2016 on the subject noted above and to remand back the enquiry report (In original) with the request to clarify the following observations and resubmit the report after probing all the charges against all the accused;

- i. The committee has not clarified the present status of Muhammad Younas Class-IV.
- ii. Charges against M/S Taus Khan, Ex-Deputy DEO(M) D.I. Khan and Atta Muhammad Superintendent at the office of DEO(M) D.I. Khan have not been examined and reported upon.
- iii. Moreover, the committee should have specified other staff of Establishment & Accounts Section who were involved in the fraudulent drawl.

Yours faithfully,

(MUJEEB-UR-REHMAN)

SECTION OFFICER (SCHOOLS MALE)

#### Endst: Even No. & Date:

Copy of the above is forwarded to the:-

1. Mr. Saif ur Rehman (*Member Inquiry Committee*), Principal, GHS No. 1 District Nowshera.

2. PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.

SECTION OFFICER (SCHOOLS MALE)





## GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No.SO(S/M)E&SED/4-17/2015/Syed Zawar Hussain Shah&others/171 Dated Peshawar the February 17, 2017

To

Mr. Musarrat Hussain (Chairman Inquiry Committee), Commissioner Kohat Division, Kohat.

Subject: -

ORDER- INQUIRY AGIANST M/S RAMBAIL KHAN DY.DEO(M), TAUS KHAN DY.DEO(M), SYED ZAWAR HUSSAIN SHAH, HEADMASTER GHS MITHAPUR, ATTA MUHAMMAD SUPERINTENDENT AT THE DEO(M) OFFICE AND MUHAMMAD YOUNAS CLASS-IV D.I.KHAN.

Dear Sir.

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- i.> The committee has not clarified the present status of Muhammad Younas Class-IV.
- ii. Charges against M/S Taus Khan, Ex-Deputy DEO(M) D.I. Khan and Atta Muhammad Superintendent at the office of DEO(M) D.I. Khan have not been examined and reported upon.

iii. Moreover, the committee should have specified other staff of Establishment & Accounts Section who were involved in the fraudulent drawl.

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21/2/2017

Yours faithfully,

(MUJEEB-UR-REHMAN)
SECTION OFFICER (SCHOOLS MALE)

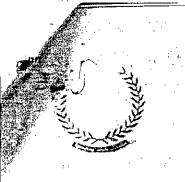
#### Endst: Even No. & Date:

Copy of the above is forwarded to the:-

- 1. Mr. Saif ur Rehman (*Member Inquiry Committee*), Principal, GHS No. 1 District Nowshera.
- 2 PS to Secretary E&SE Khyber Pakhtunkhwa, Peshawar.

SECTION OFFICER (SCHOOLS MALE)

20.12.16 J. July 1.



#### OFFICE OF THE COMMISSIONER, KOHAT DIVISIO KOHAT

No. 10601 /EA/Cmr-Kt

Dated Kohat Dec: 08, 2016

To

The Secretary,

Elementary & Secondary Education Deptt:, Govt: of Khyber Pakhtunkhwa, Peshawar.

SUBJECT:

INQUIRY AGAINST M/S RAMBAIL KHAN, EX - DDEO (M) (NOW DOWNGRADED TO LOWER POST), TAUS KHAN, EX - DY DISTRICT EDUCATION OFFICER (NOW PRINCIPAL BS- 19 GHS NO. 5 D.I KHAN), SYED ZAWAR HUSSAIN SHAH, HEADMASTER GHS MITHAPUR, ATTA MUHAMMAD SUPD. DEO (M) OFFICE AND MUHAMMAD

YOUNAS CLASS <u>- IV, D.I KHAN..</u>

Memo:

I am to refer to Elementary & Secondary Education Deptt: Govt: of Khyber Pakhtunkhwa Order No. SO (S/M)/E&SED/4-17/2015/Syed Zawar Shah HM GHS Mithapur/171 dated: 08-08-2016, on the above noted subject and to say that in pursuance of the E&SE Deptt: Govt: of Khyber Pakhtunkhwa above referred Notification, the undersigned alongwith Mr. Saif-Ur-Rehman, Principal (BS-20), GHS No.1, Nowshera Cantt: conducted a formal inquiry in the subject matter.

Inquiry Report is enclosed herewith, please.

(MUSARRAT HUSSAIN) COMMISSIONER, KOHAT DIVISION, конат.

Endst: No. & Date Even

Copy forwarded to the Mr. Saif-Ur-Rehman, Principal (BS-20), GHS No.1, District

Nowshera.

TTARY DIARY

COMMISSIONER, KOHAT DIVISION, сонат.

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NOUIRY REPORT AGAINST MR.TAUS KHAN EX-DY:DEO(M) D.I.KHAN NOW DEO(M) KARAK, MR.RAMBAIL KHAN EX-DY:DEO(M) D.I.KHAN NOW H/M,GHS D.I.KHAN,MR.ZAWAR HUSSAIN SHAH EX-DDO, GHSS MANDHRA KALAN NOW H/M,GHS DHARTIAN HARIPUR AND MR.ATTA MUHAMMAD EX-SUPDTT:DEO(M) D.I.KHAN NOW RETIRED REGARDING IRREGULAR DRAWL FROM GOVT EXCHEQUER ON ACCOUNT <u>OF</u> MUHAMMA YOUNAS CLASS-

#### PREAMBLE.

The competent authority has constituted the following enquiry committee vide office Notification No.SO(S/M)E&SED/4-17/2015/Syed Zawar Hussain Shah HM, GGS Mithapur/171 dated 08-08-2016 to conduct formal enquiry against the following officers for the charges mentioned in the charge sheet and statement of allegations already served upon the concerned Officers (Annex-A).

- 1- Mr. Taus Khan Ex-Dy: DEO(M) D.I. Khan now DEO (M) KARAK
- 2- Mr.Rambail Khan Ex-DY: DEO(M) D.I.KHAN now H/M, GHS Chehak D.I.KHAN,
- 3- Mr.Zawar Hussain Shah EX-DDO, GHSS Mandhra Kalan now H/M, GHS Dhartian Haripur.
- 4- Mr.Atta Muhammad Ex-Supdtt:DEO(M) D.I.KHAN now retired.

#### ENQUIRY COMMITTEE

- 1- Mr. Musarrat Hussain (PCS EG BS-20), Commissioner Kohat Division Kohat.
- Mr.Saifur Rahman Principal (BS-20), GHS No.1 Nowshera Cantt:

#### **ALLEGATIONS**

Being DDOs unlawfully released pay and arrears of Muhammad Younas Class-IV for various periods which caused great loss to Govt exchequer.

## TERMS OF REFERENCE OF ENQUIRY COMMITTEE

The aforesaid committee shall look into the matter, conduct formal inquiry for the charges mentioned in the charge sheet and statements of allegations already served upon the concerned Officers and submit recommendation/report to the competent authority.

#### **PROCEEDINGS**

In compliance with the above referred notification of the competent authority, the enquiry committee started the proceedings accordingly. The competent authority has already served statement of allegations and charge sheets upon the above named officers (Annex- B to M). All have submitted their replies to the enquiry committee (Annex-N to Q).

To find out the actual position the enquiry committee visited office of DEO (M) Dera Ismail Khan on dated 17-10-2016. The DEO (M) Dera Ismail Khan was requested through camp letter No.786 dated 18-10-2016 to direct the concerned Officers/Officials to provide relevant



view that the appointment of Muhammad Younas as Chowkidar at GMS Wanda Yarak has not been processed accordingly. No entry of the said Appointment order is existing in the Dispatch register of DEO (M) D.I.Khan.Photo copy of despatch register is attached for ready reference (Annex-S&T). The concerned dispatcher also stated in black & white that the endstt No. of the said appointment order is fake and not recorded in the dispatch register of DEO (M) D.I.Khan (Annex-U).

The concerned Officers/Officials were directed to appear before the enquiry committee on dated 22-11-2016 at Commissioner Office Kohat resultantly they were appeared except Feroz Hussain Shah & Riaz Swati Ex-DEOs (M) D.I.Khan, DAO D.I.Khan, S.Zawar Hussain Shah Ex-DEO of GHSS Mandhra Kalan and Feroz Khan S/Clerk of the said school. Those who were appeared before the enquiry committee recorded their statements (Annex-V to A1).

The above named absent Officers/Officials were directed to appear before the enquiry committee on dated 29-11-2016 at Commissioner Office Kohat resultantly they appeared before the enquiry committee (Annex-A2). They also recorded their statements (Annex-A3 to A5).

#### FINDINGS.

The photo copies of relevant documents provided by the above named Officers were checked thoroughly and it was observed that:-

- 1- Muhammad Younas S/o Muhammad Nawaz resident of Dahother Kacha P/o Rangpur Shumali D.I.Khan was appointed against Chowkidar post at GMS Wanda Yarak D.I.Khan by DEO (M) D.I.Khan vide Endstt: No.1622-27/DEO (M)/Class-IV Dated 10-04-2013 (Annex-A6). The said order was invalid for the reasons that (i) there is no Chowkidar sanctioned posts in Middle Schools and (ii) there is no entry recorded of such appointment order in the dispatch register of DEO (M) Dera Ismail Khan as revealed from the available record and statement of despatcher (already annexed).
- 2- Mr.Muhammad Younas Class-IV has not performed duty at GMS Wanda Yarak D.I.Khan as revealed from the written statement of Head Master, GMS Wanda Yarak (Annex-A7). There are only two sanctioned class-IV Posts i.e Naib Qasid and Sweeper at GMS Wanda Yarak against which Mr.Abdur Rasheed Sweepera and Mr.Azizur Rahman NQ are working since the establishment of the school (Annex-A8).
  - The pay of Muhammad Younas Class-IV was not released/computerized well in time for the reason mentioned above. Source-1 for computerization of pay was submitted to DAO Dera Ismail Khan shown signed by DDO and countersigned by DEO (M) Dera Ismail Khan (Annex-9). His pay was computerized for the 1st time in 07/2013 (Annex-A10).
- 4- The accused Muhammad Younas Chowkidar, GMS Wanda Yarak was shown transferred mutually vice Mr.Zakaullah Class-IV of GHSS Mandhra Kalan D.I.Khan D.I.Khan by DEO (M) D.I.Khan vide endstt No.8403-7 dated 08-10-2013 (Annex-A11). The said transfer order is also invalid for the reason that (i) the signatory authority (DEO M D.I.Khan Mr.Taus Khan) has disowned the signature marked on the transfer order and (ii) the dispatch No. recorded on the said transfer order is fake and has not been recorded in

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- 5- The DDO of GHSS Mandhra Kalan D.I.Khan Mr.Zawar Hussain Shah now Head Master, GHS Dartian Haripur has released his salary for the month of 10/2013 and 11/2013 without confirmation and issuance of LPC from the quarter concerned which is required being important accounts documents (Annex-A12). Mr.Zawar Hussain Shah Ex-DDO Mandra Kalan stated that he has signed the source documents for release of pay on the request of Feroz Khan S/Clerk of the said school. However Mr. Feroz Khan S/Clerk denied the statement of DDO Concerned.
- 6- Mr.Taus Khan Ex-DEO (M) D.I.Khan now DEO (M) Karak visited GHSS Mandhra Kalan on dated 23-04-2014 and directed the Principal concerned to immediately relieve the accused Class-IV Muhammad Younas resultantly the accused was relieved and his pay was stopped on the verbal direction of Ex-DEO (M) D.I.Khan (Annex-A13).
- 7- During the course of enquiry it was observed that though the accused was relieved from his official duty on dated 23-04-2014 but even then his salary of intervening period amounting to Rs.145000/- was prepared and submitted to DAO D.I.Khan shown signed by Mr.Rambail Khan Ex-DDO (M) D.I.Khan (Annex-A14 toA16). The DAO D.I.Khan passed the said arrear bill (Annex-A17). Though it was the responsibility of accountant as well as DDO concerned to point out the irregular drawl well in time but no recovery has so far been made from the accused. They further recorded the said amount in monthly expdt:statement for the month of 10/2014 (Annex-A18). However Mr.Rambail Khan Ex-DDO now H/M, GHS Mandhra Kalan has disowned the signatures marked on arrear bill as well as source forms as revealed from his statement (already annexed).
- 8- Apart from above mentioned facts, all the concerned DEOs/Dy:DEOs/DDOs except Mr.Zawar Hussain Shah ex-DDO, GHSS Mandhra Kalan now Head Master, GHS Dartian Haripur have disowned the signatures marked on Service documents of Muhammad Younas Class-IV Servant. No one is ready to accept the responsibility of fraudulent drawl as well as maintenance of record.
- 9- The Accused Class-IV Servant was heard in person. He verbally admitted that he has not performed duty at GMS Wanda Yarak for the reason that no staff member was present there. However after transfer to GHSS Mandra Kalan, he has performed duty from 08-10-2013 to 23-04-2014 as revealed from attendance record of the said school (Annex-A19 to A29). The accused further stated that his salary bill for the period from 01-12-2013 to 30-09-2014 was signed by Mr.Rambail Khan Ex-DDO (M) D.I.Khan. He requested for reinstatement and release of pay.
- 10-The District Accounts Officer Dera Ismail Khan Provided original service and salary record of Muhammad Younas duly submitted by Ex-DDOs of DEO (M) D.I.Khan which was checked thoroughly and it was confirmed that the claim was actually signed and submitted by the concerned DDOs which resulted irregular drawl as mentioned in the charge sheet and statement of allegations. The DAO D.I.Khan also recorded his statement (Already Annexed).
- 11-Mr.Feroz Hussain Shah Ex-DEO (M) D.I.Khan now retired stated that he has issued the

Aft.

- 12-Mr. Zawar Hussain now H/M, GHS Dartian Haripur stated in black & white that he has signed the source form of Muhammad Younas Class-IV for release of his pay.
- 13-Mr.Feroz Khan S/Clerk of GHSS Mandra Kalan stated that he has stamped the source form of Muhammad Younas C-IV prior to sign of DDO concerned (Already Annexed).

It is worth mentioning to state that three enquiries have already been conducted against the above named class-IV servant (Annex-A30 to A33). All the three enquiry committees have declared the first appointment order & transfer order as fake & bogus. Though his appointment order was issued under 25% reserved quota for the children of Class-IV servants as his father was retired from service. However no record was found at DEO (M) D.I.Khan.

During the course of enquiry, it was observed that supporting staff of establishment section and accounts section are fully involved in such fraudulent drawl. Disciplinary proceedings are required to be initiated against them under E&D Rules, 2011. However now they are trying to save their skin from any drastic action.

#### RECOMMENDATIONS.

In the light of above mentioned facts and documentary proof on record, the charges have been proved against the above named Officers. It is therefore recommended that:-

- 1- Major penalty may be imposed upon these Officers under E&D Rules, 2011.
- 2- Muhammad Younas Class-IV may be removed from service under E&D Rules.2011. The salary of absence period drawn fraudulently may be recovered and deposit into Govt treasury without further loss of time.
- 3- Disciplinary proceedings may be initiated against the concerned staff of Establishment Section and Accounts Section of DEO (M) D.I.Khan including Feroz Khan S/Clerk of GHSS Mandra Kalan D.I.Khan.

(MR.MUSARRAT HUSAIN KHAN) (PCS EG BS-20), Commissioner Kohat Division.

Enquiry Officer.

(MR.SAIFUR RAHMAN) Principal BS-20)/Enq Officer

GHS No.1 NSR Cantt:



#### OFFICE OF THE COMMISSIONER, KOHAT DIVISION KOHAT

No. 1954 /EA/Cmr-Kt

Dated Kohat March 22, 2017

Τc

The Secretary.

Elementary & Secondary Education Deptt:, Govt: of Khyber Pakhtunkhwa, Peshawar.

SUBJECT:

ORDER - INQUIRY AGAINST M/S RAMBAIL KHAN, EX – DDEO (M), TAUS KHAN, EX – DY DISTRICT EDUCATION OFFICER, SYED ZAWAR HUSSAIN SHAH, HEADMASTER GHS MITHAPUR, ATTA MUHAMMAD SUPERINTENDENT. DEO (M) OFFICE AND MUHAMMAD YOUNAS CLASS – IV, D.I KHAN..

Memo:

I am to refer to Elementary & Secondary Education Deptt: Govt: of Khyber Pakhtunkhwa letter No. SO (S/M)/E&SED/4-17/2015/Syed Zawar Hussain Shah & others 171 dated: 17-02-2017, on the above noted subject and to re-submit the enquiry report (alongwith all relevant documents) after clarifying the observations mentioned in E&SE Deptt. above referred letter, as desired, please.

SO/SM)

Endst: No. & Date Even

(MUSARRAT HUSSAIN)
COMMISSIONER, KOHAT DIVISION,
KOHAT.

Copy forwarded to Mr. Saif-Ur-Rehman, Principal (BS 20), GHS No.1, District

Nowshera.

COMMISSIONER, KOHAT DIVISION, KOHAT.

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EMOURY REPORT AGAINST MR.TAUS KHAN EX-DY DEO (M) D.I.KHAN NOW DEO (M) KARAK, MR.RAMBAIL KHAN EX-DY:DEO (M) D.I.KHAN NOW SH/M, GHS CHEHAK D.I.KHAN, MR.ZAWAR HUSSAIN SHAH EX-DDO, GHSS: MANDHRA KALAN NOW H/M, GHS DHARTIAN HARIPUR AND MR.ATTA MUHAMMAD EXSUPDIT:DEO (M) D.I.KHAN NOW RETIRED REGARDING IRREGULAR DRAWL OF PAY IN R/O MUHAMMAD YOUNAS CLASS-IV.

#### PREAMBLE.

The competent authority has constituted the following enquiry committee vide office Notification No.SO(S/M)E&SED/4-17/2015/Syed Zawar Hussain Shah HM, GH5 Mitha Pur/171 Dated 08-08-2016 to conduct formal enquiry against the following Officers for the charges mentioned in the charge sheet and statement of allegations already served upon the concerned Officers (Annex-A).

- 1- Mr. Taus Khan Ex-Dy: DEO (M) D.I. Khan now DEO (M) Karak.
- 2- Mr.Rambail Khan Ex-Dy:DEO (M) D.I.Khan now H/M, GHS Chehak D.I.Khan
- 3- Mr. Zawar Hussain Shah Ex-DDO, GHSS Mandhra Kalan now H/M, GHS Dhartian Haripur.
- 4- Mr.Atta Muhammad Ex-Supdtt: DEO (M) D.I.Khan now retired.

#### **ENQUIRY COMMITTEE**

- 1- Mr. Musarrat Hussain Khan (PC5 EG BS-20), Commissioner Kohat Division Kohat.
- 2- Mr. Saifur. Rahman Principal (BS-20), GHS No.1 Nowshera Cantt:

#### ALLEGATIONS.

Being DDOs unlawfully released pay and arrears of Muhammad Younas Class-IV for various periods which caused great loss to Govt exchequer.

#### TERMS OF REFERENCE OF ENQUIRY COMMITTEE.

- The aforesaid committee shall look into the matter, conduct formal inquiry for the charges mentioned in the charge sheet and statements of allegations already served upon the concerned Officers and submit recommendation/report to the competent authority.
- ii- In pursuance of letter No.SO(S/M)E&SED/4-17/2015/S.Zawar Hussain Shah & others/171 dated 17-02-2017, the committee clarify the present status of Muhammad Younas Class-IV
- Charge against M/S Taus Khan Ex-Dy:DEO (M) D.I.Khan and Atta Muhammad Supdtt: at the Office of DEO (M) D.I.Khan be examined & report upon.
- iv- The committee should specify other staff of establishment & accounts section who was involved in the fraudulent drawl.

#### PROCEEDINGS.

In compliance with the above referred notification of the competent authority, the enquiry committee started the proceedings accordingly. The competent authority has already served statement of allegations and charge sheets upon the above named officers (Annex-B to M). All have submitted their replies to the enquiry committee (Annex-N to Q).

To find out the actual position the enquiry committee visited Office of DEO (M) Dera Ismail Khan on dated 17-10-2016. The DEO (M) D.i.Khan was requested through camp letter No.786 dated 18-10-2016 to direct the concerned Officers/Officials to provide relevant record pertaining to the said enquiry (Ann. x-R). All the concerned Officers/Officials were of the views that the appointment of Muhammad Younas as Chowkidar at GMS Wanda Yarak has not been processed accordingly. No entry of the said appointment order is existing in the Dispatch register of DEO (M) D.i.Khan. Photo copy of dispatch register is attached for ready reference (Annex-S&T). The concerned dispatcher also stated in black and white that the endstt No of the appointment order is fake and not recorded in the dispatch register of DEO (M) D.i.Khan (Annex-U)

The concerned Officers/Officials were directed to appear before the enquiry committee on the concerned officers/Officials were directed to appear before the enquiry committee on the concerned officers of the said school of the said school. Those who were appeared before the enquiry committee statements (Annex-V to A1).

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The above named absent Officers/Officials were directed to appear before the enquiry committee on dated 29-11-2016 at Commissioner Office Kohat resultantly they appeared before the enquiry committee (Annex-A2). They also recorded their statements (Annex-A3 to A5).

#### FINDINGS.

The Photo copies of relevant documents provided by the above named Officers were checked thoroughly and it was observed that:-

- 1- Muhammad Younas S/o Muhammad Nawaz resident of Dahother Kacha D.I.Khan was appointed against Chowkidar post at GMS Wanda Yarak D.I.Khan by DEO (M) D.I.Khan vide endstt No.1622-27/DEO (M)/Class-IV Dated 10-04-2013 (Annex-A6). The said order was invalid for the reasons that (i) there is no Chowkidar sanctioned posts in Middle Schools and (ii) there is no entry recorded of such appointment order in the dispatch register of DEO (M) D.I.Khan as revealed from the available record and statement of dispatcher(already annexed).
- 2- Mr.Muhammad Younas Class-IV has not performed duty at GMS Wanda Yarak D.I.Khan as revealed from the written statement of Head Master, GMS Wanda Yarak (Annex-A7). There are only two classiv sanctioned posts i.e Naib Qasid and Sweeper at GMS Wanda Yarak against which Mr. Abdur Rasheed Sweeper and Mr. Azizur Rahman NQ are working since the establishment of the school (Annex-A8).
- 3- The pay of Muhammad Younas Class-IV was not released/computerized well in time for the reason mentioned above. Source-1 for computerization of pay was submitted to DAO D.I.Khan duly signed by Mr.Taus Khan Ex-Dy:DEO (M) and countersigned by Mr.Feroz Hussain Shah Ex-DEO (M) D.I.Khan (Annex-A9). His pay was computerized for the ist time in 07/2013 (Annex-A10).
- 4- The accused Muhammad Younas Chowkidar, GMS Wanda Yarak was transferred mutually vice Mr.Zakaullah Class-IV of GHSS Mandhra Kalan D.I.Khan by DEO (M) D.I.Khan vide endstt No.8403-7 dated 08-10-2013 (Annex-A11). The said transfer order is also invalid for the reason that (i) the signatory authority (DEO M D.I.Khan Mr.Taus Khan) has disowned the signature marked on the transfer order and (ii) the dispatch No. recorded on the said transfer order is fake and has not been recorded in dispatch register of DEO (M) D.I.Khan (Already annexed).
- 5- The DDO of GHSS Mandhra Kalan D.I.Khan Mr.Zawar Hussain Shah now Head Master. GHS Dartian Haripur has released his salary for the month of 10/2013 and 11/2013 without confirmation and issuance of LPC from the quarter concerned which is required being important accounts documents (Annex-A12). Mr.Zawar Hussain Shah Ex-DDO Mandra kalan stated that he has signed the source documents for release of pay on the request of Feroz Khan S/Clerk of the school. However Mr.Feroz Khan S/Clerk has denied the statement of DDO Concerned.
- 6- Mr.Taus Khan Ex-DEO (M) D.I.Khan now DEO (M) Karak visited GHSS Mandhra Kalan on dated 23-04-2014 and directed the Principal concerned to immediately relieve the accused Class-IV Muhammad Younas resultantly the accused was relieved and his pay was stopped on the verbal direction of Ex-DEO (M) D.I.Khan (Annex-A-13). However no further disciplinary proceeding was initiated by the competent authority due to unknown reason.
- 7- During the course of enquiry it was observed that though the accused was relieved form his official duty on dated 23-04-2014 but even then his salary of intervening period amounting to Rs 145000/were prepared and submitted to DAO D.I.Khan duly signed by Mr.Rambail Khan Ex-Dy DEO (M) D.I.Khan now H/M, GHS Chehak D.I.Khan (Annex-A14 to A16). The DAO D.I.Khan passed the sais arrear bill (Annex-A-17). Though it was the responsibility of accountant as well as DDO concerned to point out the irregular drawl well in time but no recovery has so far been made from the accused. They further recorded the said amount in monthly expdt statement for the month of 10/2013 (Annex-19 to A29). The accused further stated that his salary bill for the period from 01-12-2013 to 30-09-2014 was signed by Mr.Rambail Khan Ex-DDO (M) D.I.Khan. The accused further requested to adjustment and release of pay.
- 8- Apart from above mentioned facts all the concerned DDOs/Dy:Dos/DDOs except Mr.Zawar Hussair Shah Ex-DDO GHSS Mandra Kalan now Head Master, Gris Dartian Haripur have discorded its signatures marked on service documents of Muhammad Younas Class-IV Servant. No one signatures accept the responsibility of fraudulent drawl as well as maintenance of record.
- 9- The accused class –IV Servant was heard in person. He verbally admitted that he has all duty at GMS Wandar Yarak for the reason that no staff member was present there transfer to GHSS Mandra Kalan he has performed duty from 08-10-2013 to 23-04-1 and from attendance record of the said school (Annex-A19 to A29). The accused further

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salary bill for the period from 01-12-2013 to 30-09-2014 was signed by Mr.Rambail ex-DDO (M0 D.I.Khan. He requested for Re-Instatement and release of pay.

- 10- The District Accounts Officer D.I.Khan provided original service and salary record of Muhammad Younas duly submitted by Ex-DDOs: of DEO (MO D.I.Khan which was checked thoroughly and it was confirmed that the claim was actually signed by Mr.Rambail Khan and submitted to DAO D.I.Khan which resulted irregular drawl as mentioned in the charge sheet and statement of allegations. The DAO D.I.Khan also recorded his statement (Already annexed):
- 11- Mr.Feroz Hussain Shah Ex- DEO (MO D.I.Khan now retired stated that he has issued the appointment order of the accused Class-IV servant on the direction of Mr.Qaisar Rasheed Judge Peshawar High Court (Already annexed).
- 12- Mr.Zawar Hussain now Head Master, GHS Dartian Haripur stated in black & white that he has signed the source form of Muhammad Younas Class-IV for release of his pay.
- 13- Mr.Feroz Khan S/Clerk of GHSS Mandra Kalan stated that he has stamped the source form of Muhammad Younas Class-IV prior to sign of DDO Concerned (Already annexed).

It is worth mentioning to state that three enquiries have already been conducted against the above named class-IV Servant (Annex-A30 to A33). All the three enquiry committees have declared the 1st appointment order and transfer order as fake and bogus. Though his appointment order was issued under 25 percent reserved quota for the children of class-IV servants as his father was retired from service. However no record was found at DEO (M) D.I.Khan.

During the course of enquiry, it was observed that supporting staff of establishment section and accounts section are fully involved in such fraudulent drawl. Disciplinary proceedings are required to be initiated against them under E&D Rules, 2011. However now they are trying to save their skin from any drastic action.

The Charges have been proved against Mr.Rambail Khan Ex-Dy:DO (iM) D.I.Khan now H/M. GHS Chehak, Mr.Taus Khan Ex-Dy:DO (M) D.I.Khan now DEO (M) Karak and Mr.Zawar Hussain Shah Ex-DDO GHSS Mandhra Kalan now H/M, GHS Dartian Haripur. Mr.Feroz Hussain Shah Ex-DEO (M) D.I.Khan and Mr.Atta Muhammad have already been retired from service. It is further added that no involvement of Atta Muhammad Ex-Supdtt: has been proved.

#### RECOMMENDATIONS.

In the light of above mentioned facts and documentary proof on record, the charges have been proved against the above named Officers. It is therefore recommended that:-

- 1- Major Penalty may be imposed upon Mr.Ramabil Khan now H/M, GHS Chehak D.I.Khan, Mr.Taus Khan now DEO (M) Karak and Mr.Zawar Hussain Shah now H/M, GHS Dartian Haripur under E&D Rules, 2011
- 2- Major Penalty of Dismissal may be imposed upon Muhammad Younas Class-IV under E&D Rules, 2011. The salary of absence period drawn fraudulently may be recovered and deposit into Govt treasury without further loss of time.

3- Disciplinary proceedings may be initiated against Mr.Muhammad Aftab J/Clerk, Tariq Azız S/Clerk, Muhammad Arshad J/Clerk and Feroz Khan S/Clerk of E&SE Deptt; D.I.Khan for their involvement in fraudulent drawl.

(MR.MUSARRAT HUSSAIN KHAN)
(PCS EG BS-20), Commissioner Kohat Division
Enquiry Officer.

(MR.SAIFUR RAHMAN)

Principal BS-20,/Enquiry Officer
GHS No.1 Nowshera Cantt:

مر الم الحالة

مریحسے حکومت پاکستان توی شاخی کارڈ 12103-5788584-5 ممد لائس



بسم الثدال

الله بخدمت جناب پرسپل صاحب GHS

الله كانام مر نواز شاقعی فاهت : انگر پرس شهر فارش الدین به داش: 1982

جناب عالى!

- ( GPS کچه دی مور سے میر اوالدمحمد نوازریٹائر ہوا۔
  - GPS(۲ کچر ڈ ہور ہارے گھر کے ساتھ ملحقہ ہے۔
  - ٣) ميرى جگهسياسى طور پردوسرے آدى كے آرڈر ہوئے۔
- م) میں نے اپنے حقوق کے لیے ہائی کورٹ میں رسے کی ۔ کورٹ نے میرے ق میں فیصلہ دیا۔ (کا پی لف ہے)
  - ۲)(DEO (M) نے میری بھرتی بھکم ہائی کورٹ کردی۔ (کا پی لف ہے)
- 2)10/04/2013 ہے کے GMS وانڈ ہارک مڈل کے ہیڈ جس کے DDO جناب طاؤس خان تھے ہے تنخواہ لیتار ہا۔ ( میڈیکل سورس فارم ایرائیول رپورٹ لف ہے )
  - ۱) مور خد 08/10/2013 کوٹرل سکول میں ہائیر سکنٹری سکول مندھراں کلاںٹرانسفر ہوئی۔ (کالی لفہے)
- : 01/10/2013 تک ہائیر سکنڈری سکول مندھراں کلاں میں حاضری کی اور تنخواہ لیتار ہا۔ (حاضری رجٹرلف ہے)
  - ۱۰) سیاس مخالفت کی وجہ سے میری تخواہ بند کردی گئی۔ تنخواہ بند کرنے کا کوئی تحریری لیٹر مجھے وصول نہیں ہوا۔
- ۱۱)اس وقت کے (M) DEO ایجوکیشن نے میرے اوپرایک انگوائزی مقرر کی جس کامیں نے تحریری طور پر جواب جمع کر ایا جمع کر ایک انہوں نے جواب دیا اور نہ فیصلہ سنایا۔
- ۱۲) میں نے ضیاءالدین صاحب (M) DEO کوبار بارا پیل کی اور منت ساجت کی اور اس نے میری تخواہ کھولئے کا وعدہ کیا۔ وعدہ کیا۔لیکن اچانک وہ ٹرانسفر ہوگیا۔ (درخواست ساتھ لف ہے)
  - ١١) يس في جناب را بيل خان كوبار بارمنت اجت كي اوربار باردفتر كي چكرلگائے انہوں نے ميري تخواه
    - 01/12/2013 تك بلسائن كركے ديا درميري تنخواه كھول دى گئے۔

(سورس فارم اوربل کی کا پی لف ہے)۔

۱۲) دفتر میں اندرونی جنگ کی وجہ ہے (Deputy DEO (M) سے دوبارہ تنخواہ بند کردی گی اور میرے اوپر دوبارہ

Contact No. 0347-8503946

ا توائرى بلاكى گئى۔

۱۵) انکوائری آفیسرنے مجھے تحریری سوال نامد میا میں نے تحریری جواب تم کر دایا کیکن مجھے آج تک کوئی جواب نہیں۔ اللہ (سوال نامدلف ہے)

۱۷) انگوائری آفیر پرنیل نمبر 3 کو ہاٹ میں 05/04/216 کوایک لیٹرنمبر 425 ڈسٹر کٹ اکاؤنٹ آفیسر کور ایکار ڈ کے لیے بھیجا۔ جس پراکاؤنٹ آفیسر ڈیرہ اساعیل خان نے تحریری جواب لیٹرنمبر 540 مورخہ 15/04/2016 کو بھیجا۔لیکن اس انگوائیری کا بھی مجھے کوئی جواب نہیں ملا۔ (کا پی لف ہے)

4) آج تک نہ تو مجھے کوئی ٹرمینیشن آرڈر جاری کیا گیا اور نہ ہی کوئی تحریری لیٹر ملا۔ میں بار بار دفتر کے چکرلگا تا ہوں۔ اور مجھے دفتر سے بیٹال کر بھیج دیا جاتا کہ آپ کا کام ہوجائے گا۔

استدعا:\_

جناب عالی! میں غریب آدمی ہوں میرے چھوٹے چھوٹے بچے ہیں۔ نہی میر اکوئی ذاتی گھر ہے۔ دفتر کی اندرونی جناب سے درخواست کی جاتی ہے۔ دفتر کی اندرونی جناب سے درخواست کی جاتی ہے کہ مجھا بنی پوسٹ پر بحال کیا جائے۔

آپ کی عین نوازش ہوگی

لعارض

تديون كلاس فوربائير سكندرى سكول مندرال كلال

فتولورانه

Myos

C568/132

ontact No. 0347-8503946

office of the Distrificements office Bikhan Dated 5/4/2016 NO PR-I/DAO-Bik-540 The principal GOVI High School NO.3 Kohat (As Inging offen) Luguing against Mr. Rambail Krian Subject DY= DEO(M) Dikhan. Please reper to your letter No. 425 dated 5-4-2016 on The Subject noted about Lu This Connection it is Stated that barawise neply to as under. A prim of Rs. 1459211- Chan correctly been drawn for The DY: DEO(M) Mr Ramubaul Khan necessary Phite Copys are attachor for neady repervence and no proud is wrate. on the fast of this office. As Per Para I Ray for Oct & Nov /2013 Mas been drown at Govi Migh School Mundra Photo (opces of fay stips are artalised) Reason for Stoppage of Salary of The responsibility of The DDO. I elimin District Accounts Officer

in the later of the same

Anne.

Mr. Saif ur Rahman Principal BS-20 GHS NO.1 DISTRICT Nowshera.

#### REPLY OF CHARGE SHEET I STATEMENT OF ALLEGATION

Respected Sig

Reference of Oovernment of Khyber Pakhtunkhwa Elementsiy & Scondary

D. T. M. No SO (S/M)E&SED/4-17/2015/Syed Zawar Shah HM GHS Mitha

1. 11 2 and Peshawar the August 08-72016.

I received the above mentioned letter on 15-08-2016 and was astonished to see the allegations leveled against me.

I have the honour to submit the detailed streement as under.

## **Preliminary Objections**

1. Enquiry was initiated against Mr.Rambail Khan Ex Deputy District Education Officer (M) DIKhan by Muhammad Riaz Swati Ex-DEO (M) DIKhan on the basis of ground reality and authentic evidence his personal statement and other correspondence made with competent authority Secretary Education and Director E&SE Education are attached on account of fraudulent drawl of Rs,145921/- on the strength of mixing while Muhammad Younus chowkidar was posted at GHS Mandhran Kalan copy of while Muhammad Younus chowkidar was posted at GHS Mandhran Kalan copy of pay and adjustment of arrear were drawn in the month of October 2014. Copy of pay roll is attached as (Annexure-B). At that time Mr.Rambail Khan was Deputy District Education Officer and the under signed was Principal (BS-19) in GHS NO.5 DIKhan. The enquiry officer travelled beyond his assignment and malafidely involved me in the enquiry.

2. Even an enquiry officer did not call me for examination / statement. He never contacted me, his call letter to the concerned is attached. So he condemned me unheard which is against natural justice. All the charges /allegation framed against me are liable to be vitiated on this score.

## Reply of Charges

Charges leveled against me are false baseless. I did not released the pay and allowances of Mr. Muhammad Younis. There is no document on the record to show his pay was released on my behalf. In fact with the collusion of District Accounts Office DIKhan his pay was feeded on the basis of fake and self made documents without Service Book and according to pay rolls provided by District Accounts Office he draw his pay for three months only during my tenure of service as Deputy DEO without my signature. Copy of letter addressed to DAO DIKhan is attached. (Annexure-a-1)

Copy of charge report which he produced during the course of enquires is sufficient to prove his fake /Malpractices. Where in signature of under signed as well as stamp is fictitious which is stamped as "Dy: Education Officer Dera Ismail Khan" instead of "Deputy District Officer (M)DIKhan" copy of charge report is attached as (Annexure-D). It is worth mention that there is no post of chowkidar exist in middle schools under rules why the DAO DIKhan passed/feeded salary of above mention official.

1A (19/08/01/2

i by the command Riaz Ex DEO DIKhan an enquiry has been against M. Younis to probe certain aspects of the case. The ommittee constituted as under

Ill the reference letters of Muhammad Younis class-IV are fake and bogus the department has nothing to do with the letters.

The see throughout the pay activation process is fake.

committee also decided that Pay active source form and arrear bill been passed by the DAO DIKhan under wrong designation shown in the The concerned DAO staff must be warned to be conscious in all aspects while passing feeding the bills of government servants. order of enquiry and enquiry report is attached as (Annexure-E&F).

I came to know about his malpractice when I noticed his fake transfer order in October 2013. Without any extraneous pressure. I at once stopped his pay on my own accord through bank and DAO DIKhan in order to save the interest of government. Copy of fake transfer order, stoppage of pay orders are attached as (Annexure-G&H). I had already warned the DAO DIKhan to avoid the take feeding of new appointees on male side. (Annexure-H-1)

4. I remained posted as Dy:DO up to 30-04-2014 and not only during my tenure of posting but up to September 2014 he could not draw his pay. I left no effort to proceed against Muhammad Younis. That is why ,he failed to draw his pay up to 10/2014. Copies of various correspondence in this regard is attached as (Annexure-I to Z & Annexure 1 to 32) to understand the whole story.

5. But unfortunately during the posting of Mr.Rambail Khan DY;DO Muhammad Younis chowkidar succeeded to draw his salary which gave birth to instant enquiry.

6. I consider it worth mentioning to say that thief avails the opportunity of theft even in Khana Kaaba (The house of Allah) but when the thief Muhammad Younis was caught I did not allow him any relief till my posting as Deputy District Education DIKhan

Respected Sir, in view of above submission I may be very kindly exonerated from the charges/allegation leveled against me please. However I want to be heard in person.

Your Obediently

Mr.TAUS KHAN

EX-DEPUTY DISTRICT EDUCATION OFFICER

(M)DIKHAN.

Now, Principal (BS-19) GHS NO.5 DIKHAN

## BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. 353/2018

Rambil Khan

VS

Govt: of KP.

## <u>REJOINDER ON BEHALF OF APPELLANT</u>

## RESPECTFULLY SHEWETH:

### **Preliminary Objections:**

(1-15) All objections raised by the respondents are incorrect and baseless:
Rather the respondents are estopped to raise any objection due to their own conduct.

#### **FACTS:**

- 1. First portion of para 1 is admitted correct, hence no comments, while the rest of the para is incorrect hence denied.
- 2. Incorrect. The appellant did not sign the salary bill of Muhammad Younis. Moreover the claim was not signed by the appellant and submitted to DAO D.I Khan.
- 3. Incorrect. No proper opportunity was provided to the appellant during the inquiry proceeding. Moreover Muhammad Younis gave himself contradictory statement in different inquiries conducted on the issue. (statements of Muhammad Younis Khan statements are attached as Annexure-R-1)
- 4. Incorrect. The appellant submitted reply to show cause notice in which he denied all allegations.
- 5. Incorrect. The appellant was removed from service which was modified to compulsory retirement without conducting regular inquiry which is violation of law and rules.
- 6. Pertain to record, however the removal order was modified to compulsory retirement on his review petition and there is no need of further departmental appeal as per rules and law.
- 7. Pertain to record, however the grievance of the appellant was not redressed as the appellant filed the instant appeal for reinstatement and not for modification of removal order to compulsory retirement.
- 8. Incorrect. The removal order was modified to compulsory retirement on his review petition and there is no need of further departmental appeal as per rules and law.

9. Incorrect. The appellant has good cause of action to file the instant appeal which is liable to be accepted on the following grounds.

#### **GROUNDS:**

- A. It is correct that the removal from service was modified into compulsory retirement on the review petition of the appellant, but that order is also against the law, rules, material on record, therefore not tenable and liable to be set aside. Moreover, there is no need of further departmental appeal against the order dated 12.04.2018 as per rules and law.
- B. Incorrect. While para B of the appeal is correct.
- C. Incorrect. No proper opportunity of defence was provided to the appellant during the inquiry as neither statements were recorded in the presence of the appellant nor gave him opportunity of cross examination.
- D. Not replied according to para D of the appeal. Moreover para D of the appeal is correct.
- E. Incorrect. The appellant did not release the salary of the appellant. Moreover the Muhammad Younis gave himself the contradictory statements which shows the malafide of Muhammad Younis.
- F. Incorrect. While para F of the appeal is correct.
- G. Incorrect. The appellant did not sign the salary bill of Muhammad Younis and has no role in the issue.
- H. Incorrect. While para H of the appeal is correct.

I. Legal.

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

Through:

1

M. ASIF YOUSAFZAI ADVOCATE SUPREME COURT

**AFFIDAVIT** 

It is affirmed and declared that the contents of rejoinder are true and correct to the best of my knowledge and belief.

DEPONENT

July as shall all a shall be a shall be الله العيل في ال الوروال عبل عما حيل ح فيتر قبل كم عير في نتور بناورل البرول نے بہا ہے دنیز کی کی ہے No 271 - 24/2 July 5 2 ( 3 1 ) = July De de a mi de so d'Is problem 1 ho she fier of just 31 1 st 3 = 2-6/2/13/11/24/5/19/ b eg julyer 3) har project 3,5 h > Je de judice

Killy Illing - In . آرائزی آفسیر السلامعبكم: ٦ ب ١٥٥-8-20 كومير - خلاف إنكوالرة ای - جس میں بندہ المل مات سر کرسکا - میری قبریلی GMS وانامیارک سے کہ ایک مندھرہ فلال یاشم فلرک نے سرائی اور اُسی نے افاقینظ آس سے میری تحواہ جالو/جاری سرائی تھی۔ وہی پر نہل سے میرا سورس فارا دستخط كرايا كفا-بعر مجھے رفتر ڈی ای او بھیج دہاگیا۔ وہالی ملول سے میرے لقایا کا بال انقلا جسمی را بیل خان دیدی بے قانور دیا کے الموللہ الدیم مارك في اى اورزان على عند مراسوي الله ا وزرا من اب ما الركامر با من الم المامر با من الم المامر بالم المامر بالم المراب المامر المامر بالم المراب المامر المامر بالمراب المامر المام کاروست ہے۔ مثل سلول سے بھایا تنحواہ کی بنانے اور رہا۔ والاالمل بنده ادستر عكرك يه - جسس مبرى عرب اور عبعدى كافائده الله إليا بالي-ميرباني كركم فحق عال كياجا تخ کالی مروی کارواتی: مر الوكل

8. Incorrect. The removal order was modified to compulsory retirement on his review petition and there is no need of further departmental appeal as per rules and law.

## OFFICE OF THE DISTRICT EDUCATION OFFICER DERA ISMAIL KHAN

#### OFFICE ORDER.

Mr. Muhammad Younis S/O Muhammad Nawaz II Kacha P/O Rangpur shumali Tehsil Paharpur District Dera Ismail Khappointed as Chowkidar in AN INTERM. against the vacant post in BPS-01 (on the reserved quota of employee's son) due to the retirement of his father Mr. Muhammad Nawaz Chowkidar GPS Dahotar Kacha vide Govt: of NWFP Notification No.SOR-I (S&GAD)4-1/80 Vol-III dated 23-05-2000 with immediate effect in the light of writ petition No.308/12 dated 24-01-2013 and decision of Honor'able High Court subject to the following conditions:

### TERM AND CONDITIONS:-

- 1. His service will be considered as regular but without pension/gratuity in terms of Section-19 of the NWFP. Civil Servants Act, 1973, amended in 2005.
- He will contribute towards CPF@ 10% of the minimum of pay and 10% contribution will be made by the Government.
- 3. He will be governed by such rules and regulations as may be prescribed by the Govt. from time to time for the category to which he belongs.
- 4. His appointment is made purely on temporary basis and liable to termination at any time without assigning any reason.
- 5. One month pay will be forfeited to Govt: in case of resignation without prior notice. The period of giving notice is one month before the date of resignation.
- 6. His original certificates/degrees will be got verified by this office. All expenses will be borne by the candiciate.
- 7. He is required to join the post within 15 days, failing which the appointment order will stand cancel, automatically.
- 8. The appointment is made subject to the condition that the candidate is permanent domicile of District Dera Ismail Khan.
- 9. He is required to produce health and age certificate from the Medical Superintendent Dera Ismaíl Khan.
- 10. Charge reports should be sent to all concerned.
- 11. No TA/DA is allowed.

Sd/District Education Officer (Male)

Typera Ismail Khang

(Made) to the Month

No. 1622 - 27 DEO(M)/Class-IV Dated DIKhan the 10/4/2013

- 1. The Deputy Commissioner, DIKhan.
- 2. The Deputy District Education Officer (Male), Dera Ismail Khan.
- 3. The District Comptroller of Accounts, Dera Ismail Khan.
- 4. Official Concerned.
- 5. Office File.

District Education Officer (Male)

Dera Ismail Khan Marka Markanal Mark Tulleyalsmail Mark

11/03 ilouh Anx-1st (E) مير مسي محمد المن نا مل ما جديد ن حلى لله تعرفه بيا بير ل عیں ذیل ڈ ل اور را سل صلحات کے باتو د فسر تیا کہ میر ن سخواه بناوس - اليول ني به له يدوسر فالم م W= J1- 24/2 000 13 + UN 5 166311, min ) = po 01 30 ess Million and i es, en - Will we She jos of July 31, die e-1/2/13/11/24/=19/b= Jing Sylve John 3, > ple villes 12/03-5788584.5-

who while where we will all the SHOS mandhea Kalo ۵۰ وا مدوه بازک مین کلاس فورکی 190 6 6 mg 2 20 m 1 50 65 C Cus of Bug تھ ۔ اس سے سرے ترسی سیشن کی صبیح نروع good alocalistic as a soin 1918 July elito d'o m sitte vido ento دری - سی نے درزے 13-10-11 کو سرحوہ می ciele colonie ( Mar de la como in 50 (1) - les 1,50 (1) 200 (1) 20 - 65 دینا حوں۔ اس لئے سرہ نے تشکی اوکے لاکھی سر 1000 i 0 30 8 00 5 100 0 - 600 cospy active molissive lo سر کوشی کرک د نے ۔ اور محص فحررہ وفرز س 6,001 gir on on 200 - 60 1/2 مراع اور کو اس کوره کے دراسی کا اور 2 - or hole of 1' helow the wise 30 e Tois ver 1,29 SHSS mandhir kalan

Playof sho is wep DEO ! Ble io فرن الماس بعد بين ما والديكة لعلم س درم عبارم ملازم دین کی سیاسی افرورسوم ی عام سے سرف کو لاسے ج مع دوم ر را كما معبوراً نره في المات كا دروازه تفالمها ا @ 308/12 MP = 1 50 61, E) ME ME (3-1006)-6, c, les on 6-2 on 0-6-2 Third on it bosile Sms who Eso \_ io their -(2- ing 5)-601 جیرنگ وارزہ فارک بنوے کھرسے کا می ڈھر 12 2 1 - 136 in 1 = ow in or 1 - 63 per - 1 سراران من المرحسة مور عاليلة تك و و مشروع i, life to it of per sure in The The اس موريم سرح س - اس لفي س يه دو تول (Me Pos Pos of 6 6 6 10 1 2 8 2 9 1/04 ده کی هیا درز (۱۱۵۶-۱۱-۱۱ کو مزوره سرها وی کردی 20,8 W 20 0 m w. on 184 co in objection a will for a polycon رو الله مرو و العلق را فرس فارا الله على الله عرف الما العلام الله الله المعالي الما المعالي الما المعالي الما بهام بن دفع مالات الماس مع المولات Out (S 12/6/14

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## CHARGESHEET

Khattak, Chief Munammad Your Cass of the Mun

"You unlawfully drew salaries for the months of July, August, Separates, October and November 2013 and arrears for the periods from 10-04-2013 to 2006-2013 and 01-12-2013 to 31-10-2014 amounting to Rs.237573/- in total performing any duty and your where about is still unknown."

- **Expression of the above**, you appear to be guilty of corrugtion and misconduct under Rule-3 of the Khyber Pakhtunkhwa Government Servars (Efficiency and Discipline) Rules, 2011 and have rendered yourself liable to all or any of the penalties specified in Rule-4 of the Rules ibid.
- 3- You are, therefore, required to submit your written defence within seven cays of the receipt of this Charge Sheet to the inquiry officer/ inquiry committee, as the case may be.
- 4- Your written defence, if any, should reach the inquiry officer/ inquiry committee within specified period, failing which it shall be presumed that you have no defence to put in and in that case ex-parte action shall be taken against you.
- 5- Intimate whether you desire to be heard in person.
- 6- A Statement of Allegations is enclosed. .

(PERVEZ KHATTAK)
CHIEF MINISTER KHYBER PAKHTUNKHWA
COMPETENT AUTHORITY

Mr. Muhammad Younas Class-IV D.I.Khan

18/20/3 (10/20/3) - William (10/20/3)

-6/2013 John John 10/2013 سول س کرند کا کار ایس سر کو کروس کر 61600 SN 30 500 Steady 12 00 1 1 60 0 0 1 13 8 2 0 19 al mi je og Ors Instal ist 200 pl 2/1/1/6 - E 3/ 15% WIW DISSEL Steep & NOTO = T-6/ N Milico UN6 (11/18)-6-6-6-40 Da (2) 20 CN14190630/13 W/2 6/1/1/2309000 2 (11) Active 13 - (5v) - 2 15 16 86 on Wester EX 87, (16)/ gus mandha kali

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# TICE OF THE DISTRICT EDUCATION OFFICER (W)

Office Order

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District Education Officer (N) Dera ismail Khan

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District Education Officer (M)
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100.896.17.3.3%。 Date \_\_\_ PAYROLL SYSTEM AMENDMENT FORM Paga Min. - GHSS SINGLE EMPLOYEE ENTRY OFFICE OF THE FOR THE MONTH OF 7. Description (Cost Center) DDO Code National ID Card Number Employee Personnel Salary Number Status Grade (Pay Scale Group) CHANGE IN PAYMENTS / DEDUCTIONS Effective -GENERAL DATA CHANGE Date. Wage Paisa **New Contents** Rupees Info Field Type Туре ΙD Entered/Verified By Audited/Checked By Mandings 1 11 11 15

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## RECONCILATION STATEMENT OF EXPENDITURE FOR THE MONTH OF 0102014 EDUCATION EDUCATION EDUCATION EDUCATION EDUCATION - ARTMENT

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| S AND ALLOWANCES:  | <u> ما در </u> |               | }         |
| 001-Basic Pay  |  |               | 4,800.00  |
| 000-House Rent Allowance   |  |               | 891.00    |
| 210-Convey Allowance 2005  |  |               | 1,700.00  |
| 300-Medical Allowance  |  |               | 1,000.00  |
| 516-Dress/ Uniform Allowance   |  |               | 100.00    |
| 67-Washing Allowance   |  |               | 100.00    |
| 71-Adhoc Allowance 20110 15%   |  |               | 445.00    |
| 973-Adhoc Allowance 20110 50%  |  |               | 1,485.00  |
| .18-Adhoc Relief Allow (2012)  |  |               | 960.00    |
| Gross Pay and Allowances   |  |               | 12,201.00 |
| OUCTIONS:  |  | •             |           |
| PF Balance 212.00  |  | Subrc:        | 212.00    |
| 01-Benevolent Fund   |  | •             | 120.00    |
| 11-Addl Group Insurance  |  |               | 3.00      |
| 04-Group Insurance   |  | .•            | 58.00     |
| 90-Emp.Edu. Fund KPK   |  |               | 50.00     |
| Total Deductions   |  |               | 443.00    |
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| PAYRESTS  Prach Code:   | 12,361.00  | DEDUCTIONS<br>Payment through COM   |                          |                              |  |
|---|--|---|--------------------------|------------------------------|--|
| aczosico Hubankab Yeunis  | Prev Pers !  | o: Desig: CHESKIDAR<br>DEDUCTION &  | ARBURITES A              | Grade: AliMTR:<br>LOARATIDA: | Buckle Ho.:<br>PRINCIPAL<br>CPF1: 00702340   |
| PAYALRIS  0001. Resic Pay 1000 House Rent Aliouance 1210 Consey Alionance 20 1300 Hedical Allouance 1516 Bress/ Uniform Allou 1567 Washing Allouance 1571 Ashing Allouance 2011 | 4,800.00<br>891.00<br>1,760.00<br>1,000.00<br>100.00<br>100.00<br>445.00 | 1001 CPF Subscription - Rs<br>3501 Benevalent Fund<br>3511 Addl Group Insurance<br>3504 Group Insurance<br>3990 Emp.Edu. Fund KPK | 212:00-3-<br>120:00-<br> |                              | GPF1: 00702340   |
| 1973 Achoc Alleuance 2011<br>2110 Achoc Relief Alleu (<br>2140 15% Adhoc Relief All<br>PAYNERTS<br>Uraach Code: 230327  | 960.00<br>770.00<br>12,201.00<br>main branch D. I. Khan                  |   | •                        |                              | D I KHAH<br>HEI SUA  |
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| GP FUND - INFO TYPE 9202<br>56 Interest Applied  | •  |
| O les O No   | 57 GPF failure   |
| 55 GPF but date (DD/MM/YYYY)   | 59 Old GP Firms  |
|  | Account Number 1   |
|  |  |
| CREATE DATE SPECIFICATION - INFO TYPE 0041   |  |
| 60 Date appointed as Gazetted Offices (DDIMMIYYYY)   | 61 Suspension Date   |
|  |  |
| 62 Expiry of Adhoc / Contract Date   |  |
|  |  |
| INTERNAL DATA - INFO TYPE 0032   |  |
| 63 Previous Personnet Number (if any) 64 Na  |  |
|  | honal Tax Humber (NIR) 65 Leave without pa,  |
| 66 Cash Center   |  |
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| 57 FAMILY INFORMATION - INFO TYPE 0021   | of the state of th |
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| LA REGUBRING PAYMENTS INTO OWANCEST INFO   | TYPE unts  |
| Viage Type Description Autourt   | Wase Type Description Amount   |
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| 69 RECURRING PAYMENTS (DEDUCTIONS) - INFO T  | YPE 0014   |
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| PAYROLL STATUS - INFO TYPE 003   |  |
| 70 SALARY Start Stop   |  |
| STATUS Paymont Paymo   | nt   |
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| EDUCATION AND QUALIFICATIONS   |  |
| A ACADEMIC EDUCATION INFO TYPE (0022) (Code) Type of Institute (Code) Description of Educat  | ion Date Obtained Marks (if any)   |
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| B PROFESSIONAL QUALIFICATION INFO TODE INCO.   |  |
| B PROFESSIONAL QUALIFICATION INFO TYPE (0024)  (Code) Description of Professional qualification  | Date Obtained Proficiency  |
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53 Payment method

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| 63     | FOR THE MONTH OF   |
|        | DDO Code (ofa or new Cost Center)  Description   |
|        | PERSONNEL ACTIONS - INFO TYPE 100  |
|        | 05 Date of Entry (DD/MM/YYYY)    1   2   1   4   1   2   6   1   3   |
|        | G Current Govi   |
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|        | 11 Date of entry Into Govt sevice (DD,MM/YYYY)   |
|        | 12 Reason for action   |
|        | PERSONAL DATA - INFO TYPE 0002   |
|        | 13 Title  3 Mr O Miss. O Ma O Mrs  Enter the title in this field   |
|        | 14 Last name  YOUNTS   |
|        | 15 First name<br>午台田和干含一門口田田田田   |
|        | 16 Falher / Husband name  MUUHAMMAD  |
|        | 17 District of domicite  |
|        | 18 Martial status Martial Status Martial Status Martial Status   |
|        | 20 Date of Marriage (if applicable) DO:MM:YYY / 21. Province of Domicite   |
|        | 22 No. Of dependents   |
|        | Pukishini 24 Religion Islam  |
|        | ORGANIZATIONAL ASSIGNMENT LINFO TYPE 0001  |
| -   -  | 3 DDO Code (old or new Cost Cantra)  |
| 2      | 7 District (Sub area) 28 Courses   |
| 2      | Position  28 Contract Government  AJK Government  C Balouchistan Government  O Federal Government  D Khyber Pakhtoon Khuwa Goyu  O Gazetted  O Non Gazetter  28 Contract Government  O Punjab Government  O Sindh Contract Government  O Federal Government  O Sindh Contract Government  O Federal Gove |
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| j      | Designation 31 Ministry (Organizational Unit)  |
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Ennex-AB

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PAYROLL SYSTEM
AMENDMENT FORM. ...
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1-12-2013 636.9.201 . Remark Care Humber Same 上海路 人名斯人 新地 12017 NUMBER 000 70 23 40 6534 (Pay 1011 N Studie EUPLOYEE BARY 2001 KINENDMENT FORM. FOILTHE MONTH CE GENERAL DATA CHANG PAYROLL SYSTEM 2-13 OFFICE OF THE 132.45 1.77 | 1.67. 1.77 | 1.67.

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PAYROLL REGISTER PAYROLL REGISTER for the month of Obtober (2016)

Page 3,427 854, 93.56 103

|     | AND 1 017059 00(SAL)   | nigale Schools male Dikhan.  | า <mark>งสิธิย์กาว สาราธิย์</mark>   | 002 Section 2   | · · · · ·                             |  |  |
|-----|--|--|--|---|---------------------------------------|--|--|
| . 7 | PAY TENTS  | Prev Pers Ho:<br>Ang UNI DE Du   | C i I B % S  | (000000990)<br>7 K B G A A  | SradectOltAFXt<br>LOAX/FUND           | Buckle:No.:<br>ERINCIPAL                     | Gazetted/Kon-Gazetted; K<br>REPAID (ALAKCE   |
| 167 | 0801 Rasic Pay 1000 Höuse Rent Allouance 1210 Convey Allouance 20 1300 Medical Allouance 1833 Integrated Allunce ( 1971 Adhoc Allouance 2011 1973 Adhoc Allouance 2011 2118 Adhoc Relief Allou 2148 15% Adhoc Relief Allou-2   | 4,950,00 3001 GPF<br>891,00 3501 9ens<br>1,785,00 3511 Addl<br>1,200,00 3504 Grou<br>300,00 3990 Emp.<br>445,00<br>1,485,00<br>990,00<br>742,00<br>495,00  | Subscription - Rs volent fund . Group Insurance .p Insurance Edu Fund KPK  | 212.60-<br>120.80-<br>3.80-<br>\$8.00-<br>\$0.90-   |                                       | 00709253                                     | Gazetted/Kon-Gazetted: A<br>REPAID (ALANCE<br>3,578.00   |
|     | PAYNERTS<br>Branch Code: 232052  | Pakarpur 13,293.00   | DEDUCTIONS HANK OF PA  | 443.00-<br>kístan   | ~                                     | RET PAY 1<br>D.I. KHAH                       | 2,840.80 01.10.2014 31.10.201<br>Acent.No: 251-4   |
|     | CORPORAR HUHERAGO YOURIS   | Prev Pers Ro:<br>a h 0:0 X T = 0 E 0 U   | Desig: ANTH SASID  | (08900980)<br>Andukii   | Grade: 81 XIX:<br>LOAXZFUXO           | Guckle Ro :<br>PRIMCIPAL                     | Gazetted/Non-Gazetted R<br>REPAID BALARCE  |
|     | 1000 House Rent Allowance 1210 Convey Allowance 20 1300 Hedroll Allowance 20 1300 Hedroll Allowance 1871 Athor Allowance 2011 1973 Athor Allowance 2011 2118 Athor Relief Allow 2148 15% Adhor Relief Allow 2148 15% Adhor Relief Allow 2012 Atjustment House Sea 5011 Atj Conveyance Allow 5012 Atjustment Hedral A 5288 Atj Integrated All 2 5309 Atj Athor Allowance 5511 Atj Athor Relief 20 4530 Atj Athor Relief 20 4530 Atj Athor Relief 20 4530 Atj Athor Relief 30 15750 Atjachor Relief 30 | 5,100.00 891.00 1,765.00 1,765.00 1,200.00 300.00 445.00 1,485.00 1,020.00 765.00 510.00 8,910.00 8,910.00 6006.00 6006.00 1,000.00 6006.00 1,000.00 6006.00 1,480.00 6006.00 14,480.00 14,880.00 3501.00 14,880.00 3501.00 14,880.00 3501.00 14,880.00 3501.00 1,980.00 3990.00 | Subscription - Es Renevolent Fund Group Insurance CPF Addl Group Insur E.E.F. XWFP Fund evolent Fund Group Insurance Insurance Edu. Fund XPX | 212.00-<br>1,200.00-<br>588.00-<br>2,120.00-<br>30.90-<br>500.00-<br>120.00-<br>3.00-<br>50.00-<br>50.00- |                                       | Po11104 01.12.<br>+ Roguli<br>EPFE: 00702340 | 2,340.00 01.10.2014 31.10.201 Acont.No: 251-4  Sazetted/Non-Gazetted: R REPATO BALANCE  20A to 30-9-20/4  And 10/2014. |
|     | Branch Code:2d0327   | asia useach v.i.xnsa   | Mational Rank G. ha  | Kistan naik KRAK  | iCH .                                 | D.I.KHAH                                     | Accet Ro: 4813-9   |
|     | 99703881 HURAHAR 483940  | Prev Pers Ro: 4  | Desig MAIB PASID<br>O I I D M S  | 6 (00000999)<br>A 3 0 0 % 7   | Grade: 81 MTM:<br>LOAM/FUMD           | Buckle Ho<br>PETHETES                        | Gazetted/Mon-Gazetted: M DEPATO MALAMOS  |
| ,   | 1000 Passi Pag<br>1000 House Rent Altourses<br>1210 Convey Allousede<br>1300 Redical Allousede<br>1333 Isternated Alloused<br>1377 Adhoc Allousede 1911<br>1977 Bakoc Allousede 1911<br>18 Adhoc Kellef Allou<br>188 ISK Adhoc Kellef Allou  | 671,00 3501 080<br>1,765,00 3511 643   | Substitution (C)<br>Substitutions<br>Lignwed insurance<br>op Insurance<br>nigution, sin  | 010 00 -<br>100 00 -<br>3 00 -<br>58 00 -<br>50 05 -  | · · · · · · · · · · · · · · · · · · · |  | - N. N. CA   |

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GPF INTEREST PRESSAG

1000-Rassic Pay
1000-House Rent Allowance
1210-Cunvey Allowance
1300-Redical Allowance
1300-Redical Allowance
1371-Adhoc Allowance
1373-Adhoc Allowance
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2118-Adhoc Allowance
20110 15X
2118-Adhoc Relief Allow
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2055 Pay and Allowances College 66 Honers O2S Days GPF Balance 1,420,00 3501-Banavolani Elmd 3511-mad: Group Insurance 3404-Group Insurance 2090-Enu sou. Fund KPK Total Deductions 97 90 % 20 % 04 %

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PAYR AND ALLONANCES:

OBO1-Basic Pay
1000-House Rest Allowance
1210-Convey Allowance 2007;
1200-Hedical Allowance 2007;
1300-Hedical Allowance 2018;
1571-Adhoc Allowance 20118; 157
1773-Adhoc Allowance 20118; 557
2118-Adhoc Relief Allow (2012)
2148-157 Adhoc Relief Allow (2012)
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LER QUOTA: 4 NATIONAL BANK OF PAKMAIN BRANCH 4813-9

F Sec: 002 Homeh Hovember 2013 017097 -Head Haster 6 H S Handhry Education Schools

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BPE Balance 1,208 00 3501-Benevolent Fund 3511-Addl Group Insurance 3604-Group Insurance 3990-Emp Edu Fund KPK

Total Deductions

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F Sec:002 Month/September 2017 017059 --Do(StE) diddle Schools Mai Education Schools HTH: 90702340 01d #: ... 017055 Subre:

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PAYS AND ALLOUANCES:
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DEDUCTIONS: DEDUCTIONS:

GPF Balance 1,209,00

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0, 6, 3-01, 01, 1982 00 Years 05 Months 022 Days

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P Carcook Month September 2013 001s 017052 -Du/StL) Hiddle Schools Highertion Schools NTN: 00702340 016 #

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GFF Balance 996.00, 3501-Benevolent Fund. 3511-Addl Broup Insurance 3604-Group Insurance 3790-Enp. Edu. Fund. KPK. 6001-Adj Benevolent Fund. 6006-Adj Group Insurance 6075-Adj GFF

Total Deductions

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| P Section<br>017059 - | 2 - Hemin: August 2013<br>Do(SặE) giddle Schools Mat | S419   | D. Consider Land  |
|-----------------------|--|--|---|
| Ed<br>HTH:            | ucation Schools                                      | fiers #: G0702G40 Buckle:  | P Secides Hoseh: August 2013<br>017055 - Do(S&L) Hiddle Schools |
| GPF #:                | 00702940   | Mana: DEMARKAD YOURTS  | HTM:  |
| ក្សា ង                |  | CHIC No. 1210357885845   | GPF # 00702240  |
|                       | 017059 -   | GPt Interest Applied   | Old #   |
|                       | 4,800,00<br>891,00                                   | 01 Active Temporary PAYS AND ALLDWAMCES: 2148-151 Adhoc Relief All-2013 5002-01justment House Reat | 017059 =  |
| · .                   | 1,705.00<br>1,000:00<br>100:00<br>100:00             | 5012-Adjustment Medical All  | 3, 965, 66<br>4, 589, 66<br>2, 697, 66                          |
|                       | 1.0% 00<br>445: 00<br>1.485: 00<br>260: 00           | 5911-Adj. Adhor Relief 2011<br>5928-Adj. Adhor Relief All 2012<br>5801-Adj Resid Pay               | 47801.00<br>1701.00<br>2709.00                                  |
|                       | 42, 648, 00  | Gross Pay and Allowances DEDUCTIONS:   | 12, ∀60, 66<br>42, 648, 00                                      |
| 13-8<br>- 1           | Subrc: 212.00<br>120.00<br>3.00<br>58.00             | GPF Balance 995.00<br>6145-Adj Addl Group Insurance  | Subre:  |
| · ·                   | 50.00<br>324.00<br>174:00                            |  | 100 mg/s  |
|                       | 572.00   |  |   |
|                       | 1,522,00   | Total Deductions   |   |
| ,                     | 41, 126, 00  |  | 1,522,00  |
| EP Quota:             | A  |  | 41,126.00   |
| MATIONAL BANK O       | RAKMAIN BRANCH                                       | 0.0.8<br>01.01.1982<br>00 Years 94 Hombhs 003 Days   | LFR Guota:<br>NATIONAL SHEW OF PANHAIM BRANCH<br>4813-9         |

S#.: Pers # 00/02340 Stane BUHABBAO YOUNIS CHOUR IDAR

CHOUMIDAR
CHIC NO. 1210357885845
GFF Interest Applied
Of Active Temporary
PAYS AND ALLOHANCES:
OD01-8asic Pay
1000-House Rent Allowance
1210-Convey Allowance 2005
1300-Hedical Allowance 2005
1300-Hedical Allowance
1567-Washing Allowance
1567-Washing Allowance
1971-Adhoc Allowance 20118 15X
1973-Adhoc Allowance 20118 50X
2118-Adhoc Relief Allow (2012)
Gross Pay and Allowances
DEDUCTIONS.

GPF Balance 3501-Benevotent Fund 3511-Addl Group Insurance 3604-Graup Insurance 3990-Emp, Edu. Fund KPK

Total Daductions

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GPF #: 00702340 014 #

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Gross Ray and Allowances DEDIRITIONS OPF Balance 212 00

Subre:

Fotal Deductions

LFP Quota: NATIONAL WANK OF PAKHAI 0, O B 01.01.1982 00 Years 03 Honths 023 Days 4813-7

12, 201, 00

Subne

# بسم التدالرحمن الرحيم

# بخدمت جناب پرنسپل صاحب GHS نمبر 1 نوشهره کینٹ، خیبر پختونخواه پشاور

## جناب عالى!

- GPS(۱ کچیڈ ہوتر ہے میراوالد محمد نوازریٹائر ہوا۔ (پنشن بک لف ہے)
  - GPS کچہ ڈ ہوتر ہمارے گھر کے ساتھ ملحقہ ہے۔
  - r) میری جگه سیاسی طور پر دوسرے آ دمی کے آرڈ رہوئے۔
- م) میں نے اپنے حقوق کے لیے ہائی کورٹ میں رٹ کی ۔کورٹ نے میرے میں فیصلہ دیا۔ (کا فی لفہے)
  - ۲)(DEO (M) نے میری جرتی بھکم ہائی کورٹ کردی۔ (کا پی لف ہے)
- 2)10/04/2013 ہے کے GMS وانڈ ہیارک ڈل کے ہیڈ جس کے DDO جناب طاؤس خان تھے ہے تنخواہ لیتار ہا۔ ( میڈیکل سورس فارم ایرائیول رپورٹ لف ہے )
  - ۸) مورخه 08/10/2013 کوٹرل سکول میں ہائیر سکنڈی سکول مندھراں کلاںٹرانسفر ہوئی۔( کاپی لف ہے)
- 9)01/10/2013 ہے 30/11/2013 تک ہائیر سکنڈری سکول مندھراں کلاں میں حاضری کی اور تنخواہ لیتار ہا۔ (حاضری رجشرلف ہے)
  - ۱۰) سیاس مخالفت کی وجہ سے میری تنخواہ بند کر دی گئی۔ تنخواہ بند کرنے کا کوئی تحریری لیٹر مجھے وصول نہیں ہوا۔
- ۱۱) اس دنت کے (M) DEO ایجو کیشن نے میرے اوپرایک انکوائری مقرر کی جس کامیں نے تحریری طور پر جواب جمع کرایا جس کا نہ کوئی انہوں نے جواب دیا اور نہ فیصلہ سنایا۔
- ۱۲) میں نے ضیاءالدین صاحب DEO (M) کو بار بارا بیل کی اور منت ساجت کی اوراس نے میری تنخواہ کھولنے کا وعدہ کیا۔لیکن اچانک وہٹرانسفر ہو گیا۔ (درخواست ساتھ لف ہے)
  - ۱۳) میں نے جناب را بیل خان کو بار بارمنت ساجت کی اور بار بار دفتر کے چکر لگائے انہوں نے میری تنخواہ
    - 01/12/2013 سے 30/09/2014 تک بل سائن کر کے دیااور میری تنخواہ کھول دی گئی۔
      - (سورس فارم اوربل کی کا پی لف ہے )۔
- ۱۲) دفتر میں اندرونی جنگ کی دجہ ہے (Deputy DEO (M سے دوبارہ تنخواہ بند کر دی گئی اور میرے او پر دوبارہ

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O Dahotar c is hereby ot in BPS-01 his Jather of NV/FP ≥diate effect Hono: hble athein terms 05. ay and 10% cribed by the i termination without prior resignation. VII expenses appointment Deva Ismail candidate is the Medical Sd/-District Education Officer (Stale) Dera Ismai Khan No. 1622 -27 /DEO(M)/Class IV Dated DtKhan the 10/1/2013 1. The Deputy Commissioner, DIKhan. 2. The Deputy Listrict Education Officer (Male), Derc Ismail Khau. 3. The District Comptroller of Accounts, Devi Ismail Khan. 4. Official Concerned. 5., Office File.

District Education Officer (Mai

### The Secretary

## Elementary & Secondary Education Department

### Khyber Pakhtunkhwa

### Peshawar

Subject: Request For Acceptance of Corrigendum

### Respected Sir,

With reference to your letter no SO(SM) E&SED/4-17/2015 / Cod Tawar Hussain shah & others/171 Dated Peshawar the July 7,2017, on the subject show cause notice. I have replied and posted the desired show cause notice on 25/07/2016. The copy submitted needed correction after proof reading of para 3 in reply of show cause notice but after the correction, the uncorrected copy was attached and submitted to your honor incidentally. It is therefore requested that the attached corrected copy of the same reply please be accepted for consideration and official record.

Dated: 26/7/2017

Syed Zawar Hussain Shah

GUS Dortian

Ex-Headmaster

Haripur

Alternation Solom ) So

### The Secretary

# Elementary & Secondary Education Department

## Khyber Pakhtunkhwa

#### Peshawar

Subject: Reply of Show Cause Notice

#### Memo:

With reference to your letter no SO(SM) E&SED/4-17/2015/Syed Zawar Hussain shah & others/171 Dated Peshawar the July-7,2017, the show cause notice along with inquiry report has been served upon me on dated July 21,2017. Where I have been held guilty of inefficient on account of release of pay for the month of 10/2013 and 11/2013 without confirmation and issuance of LPC from the quarter concerned which is required being important accounts document.

I dare to present the facts and grounds to make clear picture of the case which are as under:-

- 1) I was appointed as DDO of GHSS Mandthra Kalan D.I.Khan while I was posted as Headmaster GHS Mitha Pur D.I.Khan. DDO Ship is cooperation with parent department. Moreover it is an extra duty and extra work where no any honoraria or special pay/allowance is to be paid for this extra duty.
- 2) Mr. Feroz Khan S/Clerk GHS Mandhthra kalan D.I.Khan forwarded me already filled/Prepared source 2 form with office seal and initial, along with attachment of charge report, relieving report, Computerized pay print and transfer order for signature through a messenger providing him my home address while I was residing at D.I.Khan city. I signed the source form only after checking the available record and assuming that LPC may be withheld by the clerk concerned with himself. Prior to that S/clerk concerned had informed me that the papers are complete in all respect and needed signature. In the first week of December 2013 I come to know through private sources that transfer order of Mr. Mohammad Younis class iv was fake. I contacted Mr. Feroz Khan and inquired him about LPC. He replied that he had no LPC. He argued that since the introduction of computerized pay roll system there is no need of LPC and pay print serves the purpose of LPC. Moreover District Accounts Office is accepting the pay bill on the strength of computerized pay print in case of transfer with in district. I agreed to the extent on the acceptance of pay bill by the DAO but when he denied to own his responsibilities altogether. Therefore I regretted and expressed sorrow and felt disappointment. Missing of LPC was the outcome of mishap and not willful act
  - 3) As far as the confirmation of transfer order is concerned, I was not responsible for that. It was responsibility of Mr. Mushtaq Ahmad the sitting principal BPS 18(Regular) GHSS

Mandhra Kalan who handed over the charge of the post to the official concerned and assigned him duty. I presented/conveyed the above views before the formal committee in oral hearing meeting held at commissioner office Kohat on 29/11/2016. The practice of confirmation/verification of transfer order in the case of transfer within the district does not prevail among the DDOs in all case at all.

- 4) Disciplinary inquiry procedure/Proceeding rules provide each and every available opportunity and enough time to the accused civil servant to defend the case. For this purpose 3 levels of inquiries have been proposed under the existing efficiency and discipline rules. Unfortunately I was ignored in departmental inquiry of level 2 which is of high importance because this inquiry level provides firm footings to formal inquiry. At this level of inquiry I was not provided any opportunity of clarification and explanation to defend. If I were provided opportunity to defend, the result may would be otherwise.
- 5) The departmental inquiry was initiated against me in Jan/Feb 2014 and stretched more than 3 years during this period I have absorbed a lot of mental torture and found myself in lurch. So long period cannot be justified thereof being against the E&D rules regarding time limitation.
- 6) At the stage of formal inquiry charge sheet along with a short description of allegation was served upon me without attachment of fact finding report, therefore I had no perfect information and idea of allegation to reply in a comprehensive way in written form. As the Written communication is powerful and effective medium of conveying the facts and views to defend.
- 7) It is no doubt that the LPC was very important document for accounts before the introduction of computerized pay roll system. The DAO office used to not accept pay bills regarding transfers without LPC but after the introduction computerized pay roll system the LPC as lost its importance and replaced by computerized pay print in case of transfer within the district. The District Accounts Officer honors the pay bill without LPC who is ultimate and final paying authority. So many Govt: employees are receiving the pay including Education Department without issuance of LPC in case of transfer within district.

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8) The loss occurred of amounting Rs. 24602 on account of fake transfer order and not on account of LPC. The status of transfer order determines the legality of salary released whether lawful or unlawful. Therefore I am of view that if the transfer order were be legal/ valid then pay released would be lawful under the new procedure adopted by the DAO honoring pay bill without LPC regarding transfer with in district. Moreover, I cannot be held responsible for transfer order confirmation. Resultantly, I cannot be held responsible for the loss occurred.

9) On managerial side I have shown good performance throughout my career as Headmaster and as a teacher. As Headmaster I have shown 100% SSC exam: result for last three consecutive years and won best performance award, awarded by the parent department for academic session 2014-2015 which is a golden achievement serving as Headmaster. I have appreciation letters issued to me by the higher authorities in recognition of my good performance.

I have expressed above facts and conveyed views just to make the clear personal image and not considering / finding myself the guilty of inefficient. A part from the imposed penalty(withholding of three increments for three years) which is not accordance with loss occurred and this case is defendable in the light of existing rules and on technical grounds but have decided to accept your decision because presently I am on LPR and reaching at the age of superannuation on 11-4-2018. Facing shortage of time,I am not willing to defend. If I defends, it will create financial hardships in near future which are not bearable and affordable at this stage of age.

It is therefore requested that the order may kindly be passed in this regard as early as possible.

Zawt L Syed Zawar Hussain Shah

Ex-Head Master

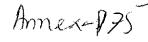
**GHS** Dartian

Haripur

Dated;26/7/2017

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Address for correspondence
Syed Zawar Hussain Shah
Ex- Headmaster
GHS Dartian
Haripur
C/o District Education Officer(M)
Haripur



To.

- 1. Mr. Musarat Hussain
  PCS EG BS-20 Commissioner Kohat
- Saif-Ur-Rehroan BS-20 Principal G.H.S No 1 Nowshera Cantt.

Subject:

#### REPLY OF CHARGE SHEET

Sir,

Kindly reference to the secretary Government of Khyber Pakhtun Khwa Elementry & Secondary Education department ORDER NO. SO(S/M)&SED/4-17/2015/Syed Zawar Hussain shah HM GHS Mithapur/171. Dated 08-08-2016 received through Email from Head Master G.H.S Mithapur D.I Khan on 18-08-2016. I have the honor to request your goodself that allegation of "Being DDO you un lawfesty released salaries for the month of October & November 2013 amounting to Rs.24,602 in total so Muhammad Younas Class IV while he was performing duty at G.H.S.S Mandhran Kalan D.I Khan" is not based on facts. The factual position is as under.

(1). I was appointed as DDO by Higher Authority. Papers for change of DDO Code i.e. Transfer order, charge report, relieving report, computerized Pay print of District Accounts Officer D.I khan and source II form in R/O Mr.Muhammad Younas Class IV were sent to me by Mr. Feroz Senior Clerk G.H.S.S Mandhra Kalan D.I Khan for signature through a special messenger.

The computerized pay print of officers/ officials is valid, certified and genuine documents of each and every civil servant which is maintained and kept updated automatically by District Accounts Officer as per actual pay allowances, stages and all other relevant data.

On the transfer/ posting of employee, only the DDO code of school/ institution is changed whereas pay and allowances and other data remains unchanged.

Mr. Muhammad Younas Class IV was already receiving pay and allowances as per actual entries/ data of the computerized pay print of the previous month. Only source II form for the change of DDO code was signed by me which was my duty as DDO. No any surplus/ additional pay was paid to him.

It is common occurrence that the computerized pay print has been accepted by District Accounts Officer for change of DDO code on transfer/posting within the district. Because the pay print of employee is updated and maintained in computerized online system and no change can be made by any individual except District Accounts Officer. Hence, this document (computerized pay print) has replaced LPC which is a Manual and the entries can be removed/erased whereas format style data and entries of computerized pay print are valid in all respect.

(2) Mr. Muhammad Younas Class IV has performed his duty during the month of October & November 2013 at GHSS Mandhra Kalan D.l.Khan.No any adverse remarks regarding attendance & performance etc were reported by his office.

#### Respected Sir,

No any irregularity has been committed and the charge of unlawful release of salaries for the month of October and November 2013 amounting to Rs 24,602 in total to Muhammad Younas class IV while he was performing duty at G.H.S.S Mandhra Kalan D.I. Khan is not correct. Therefore, it is requested that I may please be exonerated from the charge.

Yours Sincerely

Syed Zawar Hussain Shah Head Master G.H.S Dartian Haripur

EX Head Master G.H.S Mithapur D.I Khan,

Dated: 25-08-2016

طها- رسو ایری ا مسر ماب علمه ماندًا بارک ین علی میں برا اور میں میں مذکورہ کینے بہا ہے۔ 19/ you on Only of the AASS Nothing 29 20 2013 vers & who be 23 4 00 rd 2001 8 200 veller of 1 pulling 1 for in 1 for 1 for 20 1/5 Upo و محاله فالدووده و علم بران المحل الور راد المحل الور راد المحل المحل الور راد المحل مَن مَن كُورِهِ مُعْلِي مَا كُورِهِ مِنْ وَمِن مَا رَبِي الْمِنْ الْمِنْ مِنْ مِنْ الْمِنْ مِنْ مِنْ وَلِيْ الْمُنْ مِنْ مِنْ الْمِنْ مِنْ وَلِيْ الْمِنْ مِنْ وَلِيْ الْمِنْ مِنْ وَلِيْ الْمِنْ الْمِنْ مِنْ وَلِيْ الْمِنْ الْمِنْ مِنْ وَلِيْ الْمِنْ الْمِنْ وَلِيْ وَلِيْ الْمِنْ وَلِيْنَا الْمِنْ وَلِيْ وَلِيْنَا الْمِنْ وَلِيْنَا الْمِنْ وَلِيْنَا الْمِنْ وَلِيْنَا الْمِنْ وَلِيْنَا وَلِيْنَا الْمِنْ وَلِيْنَا الْمِنْ وَلِيْنَ وَلِيْنَا الْمِنْ وَلِيْنَا الْمِينَ وَلِيْنَا الْمِنْ وَلِيْنَا الْمِنْ وَلِيْنَا لِمُنْ الْمِنْ وَلِيْنَا لِمُنْ الْمِنْ وَلِيْنَا لِمِنْ وَلِيْنَا لِمِنْ وَلِينَا لِمِنْ وَلِيْنَا لِمِنْ وَلِينَا لِمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِينَا لِمُنْ الْمِنْ فَلِي وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِلْمِن وَلِينَا لِمُنْ الْمِنْ وَلِينَ لِينَا لِمُنْ الْمِنْ وَلِينَ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِلْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَا لِمُنْ الْمِنْ وَلِينَالِي وَلِينَا لِمِنْ فِي وَلِينَا لِمُنْ الْمُنْ وَلِينَا لِمُنْ الْمُنْ وَلِينَا لِمُنْ الْمُنْ وَلِينَا لِمُنْ الْمُنْ وَلِينِي وَلِينَالِي وَلِينَالِمُ وَالْمُنْ وَلِينَالِي وَلِينَالِي وَلِينَالِي وَلِينَا لِمُنْ الْمُنْ فِينِينِي وَلِينِ وَلِينَا لِمُنْ الْمُنْ فِيلِينِي وَلِينَالِي وَلِينِ وَلِينَا لِمُنْ الْمُنْ فِي مِنْ فَلِي مِنْ Des du say 2 10 /2 1/2 (10 /2) " " (10 /2) " ( 6 / 3 c/ 20 23. / 2 le julio > > 1 julio > 1 julio > > 1 julio > 26 lb 1 = 2 in so ]. Cro 1 gin com en 26 w dlg. rs العدار في بالعالم المراد في العدار في العدار في العدار في العدار في العدار في العدار Contact No. 0347-8503946

سان صلى مناسب لمر لوكن نامع المع Spo mandhes Kalis سى دود كود دارده بارك س معرس فوركى لوسط پر کسان کا جرکه به نیرون می وسط کا فی دور تھ ۔ اِس مِدِ منرہ نے ترسیسٹن کی صبحرنروہ serve elocilistic de do se ses les الله - صحوب برمانی زمانے دوئے مرسار در July Eligho dil m sitte mago sur l دسے۔ سی نے درزے 13-11 کو منرفوہ من ك - كوراب من فاكا عدم بنوا من دوكام ايام د رینا حوں۔ اس لئے بنرہ نے شنی دہ کے مے کھی م آؤں۔ تا معد کو عمل کی کو اکفی نے معامد (62 pay active molission lo ایر کشی کر در سے - اور AB قرن دفر می 6,001 gir 6,00 - 50 200 - 60 1/2 حور رام / ورسکو / ملاکوره کے درکسترا) جد اور 2 - or who or 1' he was the way of ديور ديون عن فرن ع NO CHIS SHSS Mandbrie kalan

Statement of Syed Foroz EX DEO (M) D/Khan-Dhave appeared before the inquity commi in Connection with inquisy against No Ramber Khan, Muhomonad Yoursis Class IV Servant-Thave been approintment order, source form and other second. As regard to me me Signalure seem lo me either real/sconse photo copy/ pencilled I can not a say anything about the signature of other officers/office because those were not signed in mypresence More over Ex. EDO Abdul Rahim Kharl, Ex. Dy DE Mr Tauskhan issered motification earlier that the Fake signature are in præctice. the sail Hong

### KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

| No. | 181 | /ST | Dated | 27 | 101 | / 2021 |
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|     |     |     |       |    |     | ,      |

To

The Secretary E&SE Department, Government of Khyber Pakhtunkhwa, Peshawar.

Subject: -

JUDGMENT IN APPEAL NO. 353/2018, MR, RAMBAIL KHAN.

I am directed to forward herewith a certified copy of Judgement dated 18.01.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

## **VAKALAT NAMA**

NO.\_\_\_\_\_/20

| IN THE COURT OF _   | Ko P.1c | Sexuiu      | Trobund, 1                  |  |  |  |  |
|---|---------|-------------|-----------------------------|--|--|--|--|
| A   | ansim   | khaes       | (Appellant)<br>(Petitioner) |  |  |  |  |
|   | VE      | ERSUS       | (Plaintiff)                 |  |  |  |  |
| Edu   | ration  | Deptt       | (Respondent)<br>(Defendant) |  |  |  |  |
| I/Wé, Ran   | bail    | Khoer       | ,                           |  |  |  |  |
| Do hereby appoint and constitute <i>M. Asif Yousafzai, Advocate Supreme Court Peshawar</i> , to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs. |         |             |                             |  |  |  |  |
| I/We authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.                         |         |             |                             |  |  |  |  |
| Dated/2   | 0       | <del></del> | CLIENT)                     |  |  |  |  |
| ·   |         |             |                             |  |  |  |  |

<u>ACCEPTED</u>

M. ASIF YOUSAFZAI Advocate Supreme Court Peshawar.

*Taimur Ali Khan*Advocate High Court

Syed Nauman Ali Bukhari
Advocate

### **OFFICE:**

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Cell: (0333-9103240)