

تاریخ	وقت	موضوع	روز یکشنبه			روز دوشنبه			روز سه شنبه			روز چهارشنبه			روز پنجشنبه		
			وقت	موضوع	ملاحظات	وقت	موضوع	ملاحظات	وقت	موضوع	ملاحظات	وقت	موضوع	ملاحظات	وقت	موضوع	ملاحظات
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نام: _____
 نام خانوادگی: _____
 آدرس: _____
 شماره تماس: _____

رجستر جلسات و جلسات

تاریخ: _____

۲۰۱۶

۲۰

 (21)

OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE) PESHAWAR.

SANCTION:

Sanction is hereby accorded to the preparation of Duplicate Service Book in respect of Mr. Farhan Ullah Khan C.T Govt: Middle School Ghari Fazle Rahim Peshawar subject to the completion of the following formation / conditions:

- 1- Before the preparation of the duplicate Service Book, report of the concerned may be obtained and placed in personal file of the official concerned.
- 2- After the relevant record on the basis of which duplicate Service Book must be placed in the personal file of the official concerned to ensure correct entries in the service book.
- 3- The following certificate must be recorded in the service before making any entry is made.
 - a) The official concerned had not been absent himself from duty, nor proceed on leave with pay for more than five years.
 - b) The official concerned had not been terminated or resigned from service during the entire service.
 - c) That the teacher concerned had not granted long term advance i.e HBA sector advance etc during his entire service.
 - d) That the teacher concerned was not suspended from service in case of suspension period was considered as duty or leave etc the case may be.



DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR

Endst: 8061-64 dated Peshawar the:-

30/12/2015

Copy of the above is forwarded for information and necessary action to the:-

- 1- Accountant General Khyber Pakhtunkhwa Peshawar.
- 2- P.A to District Education Officer (Male) Peshawar.
- 3- Head Master Concerned
- 4- Teacher concerned.


Dy: District Education Officer
(Male) Peshawar. 

22

**BEFORE THE PESHAWAR HIGH COURT
PESHAWAR**



W.P No 53 P 2017

Farhan ullah khan S/o Ziarat Gul
R/o Mohallah Bota Kheil, Surezai Bala, Tehsil and District
Peshawar.....**Petitioner**

VERSUS

- 1) Govt. of K.P.K, through Secretary Education Department, Civil Secreterate, Peshawar
- 2) The Accountant General of K.P.K
- 3) The Director of Education & Secondary Education, G.T Road, Peshawar, K.P.K
- 4) District Education Officer of Education & Secondary Education, G.T Road, Peshawar, K.P.K
.....**Respondents**

**WRIT PETITION UNDER ARTICLE 199
OF THE CONSITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN 1973**

Respectfully Sheweth:

1. That the petitioner is highly qualified did Master in Islamiat beside this done professional course Ct and has been inducted in Education Department against CT post (BPS-09) on 04.05.2009 at GHS Mathani, Peshawar. **(Copy of the appointment letter and attendance sheets and certificates are attached here with as annexure "A")**

FILED TODAY
Deputy Registrar
05 JAN 2017

ATTESTED
EXAMINER
Peshawar High Court

26 FEB 2018

23

2. That the petitioner has served the GHS Mathani, Peshawar from the day first till 01.03.2011 his performance was satisfactory. He has rendered valuable service to the best to the GHS Mathani, Peshawar, he is dutiful and no adverse remarks ever been passed by the department.
3. That without the show cause and without any plausible reason the petitioner astonishingly received an unlawful and an illegal dismissal/removal order Endst:1417 by the respondents on 01.03.2011. **(Copy of the dismissal order of 01.03.2011 is attached as annexure "B")**
4. That the petitioner did approach the respondents with his all service record regarding his grievances, which the respondent no.04 after thoroughly investigation soon after re-instated in service the petitioner on dated: 21.03.2011 and adjusted at Govt: Middle School Asia Park, Peshawar.
- (Copy of the re-instatement order 21.03.2011 is annexure "C")**
5. That the petitioner was ceaselessly working at Govt: Middle School Asia Park, Peshawar city and been transferred to GMS, Ghari Fazal Rahim, Peshawar. **(Copy of the transfer order dated: 08.10.2015 is attached as annexure "D")**

FILED TODAY

Deputy Registrar

05 JAN 2017

ATTESTED
EXAMINER
Peshawar High Court

26 FEB 2018

24

6. That according to (pay Roll/Pers # 00307279), the petitioner received salaries timely till the month of December 2015. **(Copies of the salary slips are attached here with as annexure "E")**
7. That at AG office accountant Sajid malfidely action the petitioner salary has been stopped without any lawful reason from the month of December 2015 by the respondents.
8. That the petitioner did submit an application to the respondents on dated:25.01.2016 accordingly but nobody paid any heed, using delaying tactics, giving verbal agreements so far; which amounts to the denial of the petitioners legal right, who otherwise legally fully liable to get monthly his salary like other colleagues. **(Copy of the application dated:25.01.2016 annexure "F")**
9. That the petitioner being aggrieved from the actions and acts of the respondents and finding no other adequate and officious remedy is constrained to file this writ petition inter alias on the following grounds.

GROUND:

- A. That the petitioner gave continuously services in different School of Peshawar, K.P.K even then the respondents illegally, unlawfully against the rules and policy without dismissal or any misconduct stopped the petitioner salary since December 2015 which is basically the legal right

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Deputy Registrar
05 JAN 2017

ATTESTED
EXAMINER
Peshawar High Court
26 FEB 2018

25

of the petitioner, this is completely discrimination in the eyes of law and thus the respondents have acted in violation of Article (4) of the Constitution of 1973.

- B. That the petitioner was denied his legal right of his salary, which was provided to him under the law and therefore, he was discriminated and not given his due right without any lawful reason.
- C. That the petitioner other colleagues/employees under the same circumstances are taking their salaries, while the petitioner has been denied, which offend article (25) of the constitution of Pakistan 1973.
- D. That to be treated in accordance with law and to enjoy equal protection of law is the inalienable right of every citizen, guarantee by the constitution.
- E. That though the petitioner has got no single adverse remarks in his service record by the respondents but even then he is not dealt fairly, justly and was ignored by the respondents for malafide reasons.

That the petitioner is still on the strength of department, thus stoppage of salaries will definitely affect his fundamental rights to live as well as the act on the part of respondent's amount to forced labour.

FILED TODAY
Deputy Registrar
05 JAN 2017

ATTESTED
EXAMINER
Peshawar High Court.

26 FEB 2018

26

- G. That the respondents have acted in a manner, which clearly amounted to the denial of the right of petitioner hence this petition.
- H. That any other relevant ground, which may not taken in this petition please may be allowed to agitate at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of this Writ Petition the act of the respondents not accepting legal right of the petitioner **salary of (12) months i.e since December 2015** is based on malafide, without lawful authority and of no legal effect, this Honorable Court may be pleased to declare the act of respondents unlawful, void ab initio and please may direct the respondent no. 2 that to act in the matter in accordance with law to consider the petitioner genuine matter and to restart his salary with arrears accordingly.

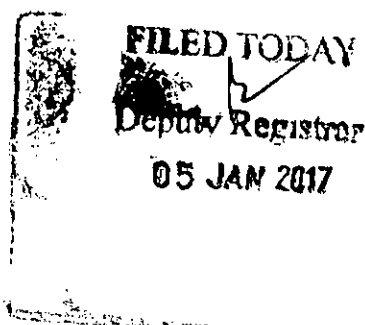
Any other relief which this Honorable Court may deem appropriate in circumstances of the case may also be granted to the petitioner.

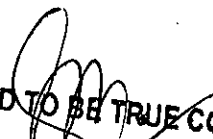
Petitioner

Through

Dated 31/12/2016

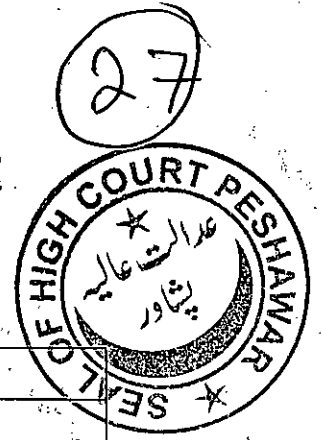

Aamir Ullah Khan Chamkani
 Advocate High Court, Peshawar




CERTIFIED TO BE TRUE COPY
 Examiner
 Peshawar High Court, Peshawar
 Authorised Under Article 8.7 of
 The Qanun-e-Shehadat Order 1984
 26 FEB 2018

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET



Date of Order of Proceedings	Order or other Proceedings with Signature of Judge.
1	2
22.02.2018	<p><u>W.P.No.53-P/2017.</u></p> <p>Present: Mr.Aamir Ullah Khan Chamkani, Advocate for the petitioner.</p> <p>Syed Qaiser Ali Shah, AAG for the respondents.</p> <p>***</p> <p><u>YAHYA AFRIDI, C.J.-</u> Farhan Ullah Khan, petitioner, seeks the constitutional jurisdiction of this Court praying that:-</p> <p><i>“It is, therefore, most humbly prayed that on acceptance of this writ petition the act of the respondents not accepting legal right of the petitioner salary of 12 months i.e. since December 2015 is based on malafide, without lawful authority and of no legal effect, this Honourable Court may be pleased to declare the act of respondents unlawful, void ab initio and please may direct the respondent No.2 that to act in the matter in accordance with law to consider the petitioner genuine matter and to restart his salary with arrears accordingly.</i></p> <p><i>Any other relief which this Honourable Court may deem appropriate in circumstances of the case may also be granted to the petitioner.”</i></p> <p>2. Today, the worthy counsel for the petitioner contends that his educational credential has been verified, however, he seeks withdrawal of the present</p>

ATTESTED

EXAMINER
Peshawar High Court

26 FEB/2018

(F-6)



ATTESTED

EXAMINER
F. J. [illegible]

2018 MS

27A

petition to agitate his grievance before the Khyber Pakhtunkhwa Services Tribunal. Order accordingly.



Sd - Yahya Afridi - CJ
Sd - Mohammed Ayub Khan J

CERTIFIED TO BE TRUE COPY

Examiner
Peshawar High Court, Peshawar
Authorised Under Article 87 of
The Qanun-e-Shahadat, Order 1988

26 FEB 2018

No. 11479
 Date of Presentation of Application 27/2/18
 No of Pages 10 - P
 Copying Fee /
 Urgent Fee /
 Total Rs 40/-
 Date of Preparation of Copy 26/2/18
 Date of Delivery of Copy 26/2/18
 Received By For handover

P-1

(28)

The Director,
Elementary & Secondary Education,
Peshawar :

*Director Pesh
P.A. has to be
the matter is
resolved in the
same way as
rules of P.A.
[Signature]*

DEPARTMENTAL APPEAL/REPRESENTATION

SIR,

With due respect, I beg to say that I was appointed in your prestigious ^{Director} department as "CT" on 4/5/2009 and was posted at GHS Mattani Peshawar ^{Elementary & Secondary Education} submitted that before getting into this job, I was serving in Khyber Pakhtunkhwa ^{Khyber Pakhtunkhwa} Police Department as a "Constable" and through proper channel applied to this post and NOC was also given to me by the Police Department on 2/1/2009. It is important to submit that after serving for about two years as a "CT" at GHS Mattani, Peshawar, I was informed that my academic documents were fake and bogus and I was dismissed from service on 1/3/2011. Feeling aggrieved from this dismissal order, I submitted an appeal to the competent authority and I was reinstated to my post of "CT" on 21/3/2011. *(Appointment & NOC attached)*

After my reinstatement, I was directed to perform my duties at GMS Asia Park, Peshawar. Furthermore, I was transferred to GMS Ghari Fazal Rahim, Peshawar on 8/10/2015. It is also submitted that sanction was also accorded to me for preparation of duplicate service book by the Deputy District Education Officer (Male) Peshawar on 30/12/2015.

It is also added that my salaries from the month of January 2016 was stopped for which I filed writ petition no. 53/2017 before the Honorable Peshawar High Court Peshawar in January 2017 wherein due to wrong forum, it was not entertained and advised to approach to proper forum.

In order to prove my innocence, it is submitted that I was a regular civil servant and was working in the Khyber Pakhtunkhwa Police Department as a "Constable" and was allotted constabulary no. 1779 and I acquired such appointment on my Bachelors education (B.A).

My academic documents are absolutely correct and genuine because I acquired my bachelor's degree in the year 2005, about four years prior to the appointment in the Education department as "CT". During the course of studies in

P.T.O

*3303
23-1-2018*


P-2

29

Bachelor's level, I was awarded University Registration No. 2003-PC-2750 while I completed Master in Islamyat in the year 2012 where the Registration no. is same which means that there is no doubt and problem in my academic qualification. Apart from it, my other academic documents are absolutely correct because all of them have been verified by the concern board and university. **(Academic Documents attached)**

The act of the department is unlawful because my salary since January 2016 has been stopped despite of the fact that there is no dismissal, removal or suspension etc order against me in conjunction with the fact that I have also been de-seated from my post which is against the mandate of law and rule. It is also added that without the conduction of proper departmental proceeding, proper inquiry, show cause and even there is no statement of allegation served on the appellant which clearly shows the mala fide on the part of the department because the guidelines of E & D Rules 2011 have not been complied with and my salary from January 2016 has been stopped and I have been stopped from working as well. Such attitude of the department is a clear violation of natural adage "Audi Alterem Partem".

It is therefore, requested that on acceptance of this appeal, I may kindly be adjusted on my post and may salary since January 2016 may be released till date please.


16-4-2018

(Farhanullah Khan)

CT, GMS Ghari Fazal

Rahim, Surrizai Payan

Peshawar

S/O Ziarat Gul

R/O Village Surrizai Bala,

Peshawar

30

OFFICE OF THE DISTRICT EDUCATION
OFFICER (MALE) PESHAWAR.

No. 14893 / P/F-farhanullah Ex-CT

Dated 26/6 /2018

To,

Mr. Fahan Ullah Khan
Mohallah Bota Khel, Surizai Bala
Peshawar.

Subject: DEPARTMENTAL APPEAL / PRESENTATION
Memo:


I am directed to refer to the subject cited above and to state that your departmental appeal has been rejected by Director (E & SE) KPK Peshawar vide his letter No 3744/F.No.7/Vol-II/Anti-Corruption dated 21-06-2018.

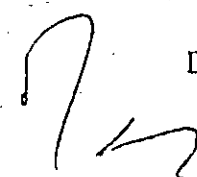
Therefore you are informed accordingly.

Endst: NO. 1

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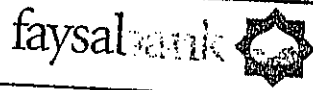
- 1 Director (E&SE) KPK Peshawar.
- 2 Head Master GMS Garhi Fazal Rahim Peshawar.


Dy. District Education Officer
(Male) Peshawar.


Dy. District Education Officer
(Male) Peshawar.

31

University of Peshawar



EXAMINATION FEE

No. 664822

Date 27/11/2017

Faysal Bank Limited

University Campus Branch, Peshawar

A/C No. 0250-145-0000009

Name Farhanullah S/O Ziarat Gul

On account of Verification

Rs. (In Figures) 1400/-

Rs. (In Words) Fourteen Hundred only

For Bank Use Only

Rs. _____

Date _____

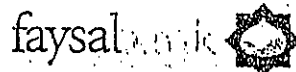
Sign of Head Cashier 27 NOV 2017

Cash Scroll No. _____

Officer's Signature _____

Attested
J
AHC

University of Peshawar



32

EXAMINATION FEE

No. 664821

Date 27/11/2017

Faysal Bank Limited

University Campus Branch, Peshawar

A/C No. 0250-145-0000009

Name Farhan Ullah s/o Zaidat Gul

On account of Verification

Rs. (In Figures) 1400

Rs. (In Words) Fourteen Hundred only

For Bank Use Only

Rs.

Date 27 NOV 2017

Sign of Head Cashier

Cash Scroll No.

Officer's Signature

Attested
Jing
ASK

33



UNIVERSITY OF PESHAWAR

DEGREE SECTION

Verification Slip

Received _____ Degree(s) / Certificate (s) for Local / Foreign Verification

Name Fayhan Ullah Khan Original/Photocopy Roll No (35738) Issued Dated _____
(29040)

[Signature]
Dealing Assistant
Degree Section

Note :- This slip must be produced at the time of recollection.

*Alleged
Copy
ABC*

Intermediate & Secondary Education
Peshawar

CASH VOUCHER

User Online: Khalil Ullah

2017028402 Dated: 23/11/2017 2:38:19PM

Mr./Miss: FARHAN ULLAH

ZIARAT GUL

HUNDRED ONLY

on a/c of : Verification

Signature:

23 NOV 2017

Board of Intermediate & Secondary Education
Peshawar



CASH VOUCHER

User Online: Khalil Ullah

Receipt #: 2017028401 Dated: 23/11/2017 2:38:16PM

Received From Mr./Miss: FARHAN ULLAH

Father's Name: ZIARAT GUL

Rupees: TWO HUNDRED ONLY

Rs. =200/- on a/c of : Verification

Signature:

23 NOV 2017

34

Intermediate & Secondary Education
Peshawar

CASH VOUCHER

User Online: Khalil Ullah

2017028400 Dated: 23/11/2017 2:38:11PM

Mr./Miss: FARHAN ULLAH

: ZIARAT GUL

0 HUNDRED ONLY

on a/c of : Verification

Signature:

23 NOV 2017

Handwritten signature and initials

Board of Intermediate & Secondary Education
Peshawar



CASH VOUCHER

User Online: Khalil Ullah

Receipt #: 2017028399 Dated: 23/11/2017 2:38:08PM

Received From Mr./Miss: FARHAN ULLAH

Father's Name: ZIARAT GUL

Rupees: TWO HUNDRED ONLY

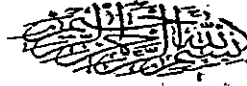
Rs. =200/- on a/c of : Verification

Signature:

23 NOV 2017

S.No. 125580

Roll No. 22486



REVISED



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination

SESSION 2000 – ANNUAL

(Science Group)

This is to Certify that Farhan Ullah Khan Son / Daughter of Ziarat Gul
and a student of Khalil Mohmand School & College, Badaber, Peshawar has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in March/April, 2000 as a Regular
candidate. He / She obtained 478 Marks out of 850 and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|----------------|--------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Chemistry |
| 2. Urdu | 4. Pakistan Studies | 6. Physics | 8. Biology |

He / She has been awarded Grade C on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form February 15, 1985

Issued in lieu of O.C# 105090 (Annual - 2000)

Asstt Secretary

Secretary

GRADING FORMULA

Maximum Marks 350

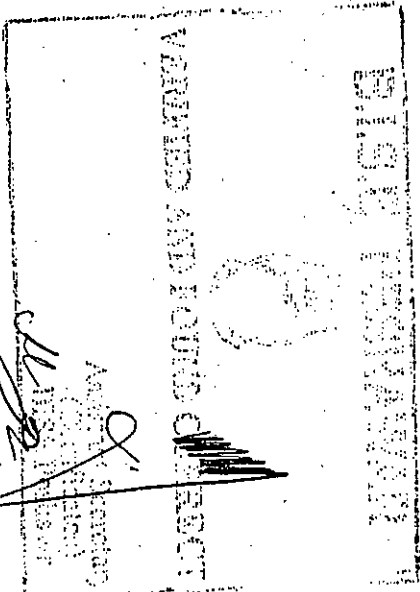
Percentage of Marks

80% and above	A One 580 and above
70% and below 80%	A 595 to 679
60% and below 70%	B 510 to 594
50% and below 60%	C 425 to 509
40% and below 50%	D 340 to 424
Below 40% and Minimum Pass Marks	E 339 and below

Grades

Remarks:

Outstanding
Excellent
Very Good
Good
Fair
Satisfactory



[Signature]
23/11/2017

S. No. PB ~~208308~~ ND 208308

36

Board of Intermediate & Secondary Education
PESHAWAR

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(SCIENCE GROUP)

Session 19 2000 (Annual/Supplementary)

Name Farhan ulah Khan
Father's Name Ziaraat Khan Roll No. 22486

SUBJECT	Total Number of marks allotted	MARKS OBTAINED			
		Theory	Practical	In Figure	In Words
1. English	150			114	/
2. Urdu	150			84	
3. Islamiyat	75			49	
4. Pakistan Studies	75			32	
5. Mathematics	100			58	
6. Physics	100	40	15	55	
7. Chemistry	100	25	11	36	
8. Biology	100	38	12	50	
Total	850			478	Four hundred & seventy eight

Note: Errors/Omissions excepted
F: Failed in the paper (s)

Verified

Prepared by: _____
Checked by: [Signature]
Date 22/6/20 19

[Signature]
Assistant Controller Secrecy
Board of Intermediate & Secondary Education, Peshawar
24/11/17

[Signature]
Controller of Examinations
Board of Intermediate & Secondary Education
PESHAWAR

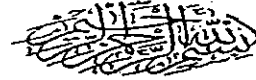
Attested
[Signature]

37

S.No. 115021

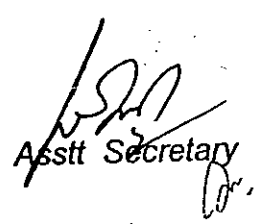
Roll No. 58822

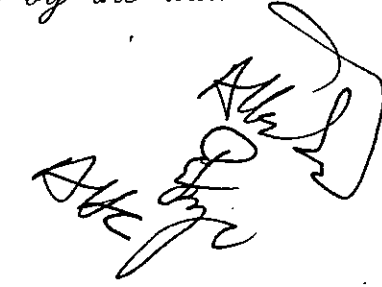
Group. Pre-Engineering



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION
SESSION 2002-ANNUAL


This is to Certify that Farhan Ullah Khan *Son of* Ziarat Gul
and a student of Govt. College Badber Peshawar *Registered No.* 20-B/BDR-2000
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May, 2002 *as a* Regular *Candidate. He obtained* 531 *Marks out of 1100*
and has been placed in Grade D *Representing* Fair *. He has been awarded Grade* D *on the*
basis of internal assessment by the institution concerned. The Examination was taken as a whole.


Asstt Secretary




Secretary

37

B.I.S.E PESHAWAR

VERIFIED AND FOUND CORRECT
Assistant Secretary
(Certificates Inter),
B.I.S.E Peshawar

24/11/2017
24/11/17

GRADING FORMULA

Maximum Marks 1100

Percentage of Marks

80% and above
70% and below 80%
60% and below 70%
50% and below 60%
40% and below 50%
Below 40% and Minimum Pass Marks

Grades

A One 880 and above
A 770 to 879
B 660 to 769
C 550 to 659
D 440 to 549
E 439 and below

Remarks

Outstanding
Excellent
Very Good
Good
Fair
Satisfactory

38

0365

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



PESHAWAR

DETAILED MARKS CERTIFICATE INTERMEDIATE (ANNUAL) EXAMINATION, 2002 PRE-ENGINEERING (Part-II)

Name : FARHAN ULLAH KHAN

Father's Name : ZIARAT GUL

Roll No: 58822

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	46	--	33	--	79	Seventy-Nine
Urdu	200	45	--	56	--	101	One Hundred One
Islamic Education	50	32	--	--	--	32	Thirty-Two
Pakistan Studies	50	--	--	20	--	20	Twenty Only
Mathematics	200	56	--	43	--	99	Ninety-Nine
Physics	200	57	--	43	12	112	One Hundred Twelve
Chemistry	200	29	13	34	12	88	Eighty-Eight
Total : 1100						531-D	Five Hundred Thirty-One Only
Remarks :							

Verified by

Assistant Secretary
Board of Intermediate & Secondary Education, Peshawar

Signature

Checked By : _____

Date : 03-September, 2002

Note: Error / Omissions excepted

Khaksar and BRAINS Software Enterprise (KBSOft)

Controller of Examinations

Signature

University of Peshawar پشاور یونیورسٹی

Session: Supplementary 2004

①

③۹

③۹

FARHAN ULLAH KHAN
son of _____
ZIARAT GUL and _____

Affiliate Candidate of _____
District Peshawar
having passed the _____

prescribed examination held in _____ January 2005
is this day admitted by the University of Peshawar to

the Degree of _____ Bachelor of Arts.
in _____ 2nd Division
The examination was taken _____ In Parts

Registration No. 2003-PC-2750
Roll No. 2948
Q.M.T. No. 17301-7013087-7
Result Declared on April 18, 2005



079614

Chancellor

Registrar

29/11/17
D O O
2550

PREPARED BY
CHECK
DATE

40

0

40

University of Peshawar

Session: Annual 2011

Pakistan

FARHAN ULLAH KHAN

son of

ZIARAT GUL

and a

Private Candidate of

District Peshawar

having Passed the

prescribed examination held in July 2011

is this day admitted by the University Of Peshawar to

the Degree of

Master of Arts in Islamiyat

in 2nd Division

The examination was taken as a whole

Registration No. 2003-PC-2750

Roll No. 35738

C.A.T.C. No. 17301-7013087-7

Result Declared on January 31, 2012



079164

[Signature]
Registrar

[Signature]
Vice Chancellor

DR 219

DR 219
PROPERTY OF THE
PROPERTY OF THE

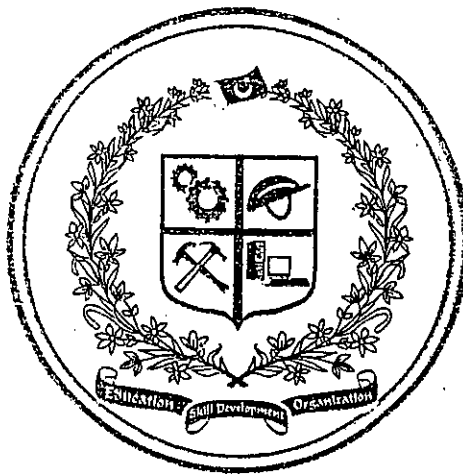
11/11/14

11/18/14

41

Roll. No: 2911347

Master log certificate
000100027



Skill Professional Trade Testing Council

Established under Education
& Skill Development Organization
Act, XXI of 1860, Government of Punjab, Pakistan

DETAIL MARKS SHEET/TRANSCRIPT

Certified Teacher

Final Result

Name: Farhan Ullah Khan S/O Ziarat Gul
Session: 2005-2006
Duration of Diploma: 01 Year
Conducted at: Khyber Institute of Management and Technology Peshawar.

Course Contents

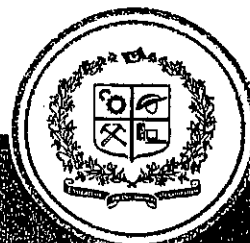
<ul style="list-style-type: none"> • Teaching of english • Educational Psychology • School Organization and Management • Dimensions in Education • Teaching Strategies & Evaluation • Foundations of Education • Urdu and Its Teaching 	<ul style="list-style-type: none"> • Social studies and its teaching • Home Economics and its Teaching • Science and its Teaching • English and its teaching • Islamiat and its teaching • Practical workshop and Teaching Practice
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Marks Obtained	1250
Total Marks	1500
Percentage	80%
Grade	A
Passing Marks	50%

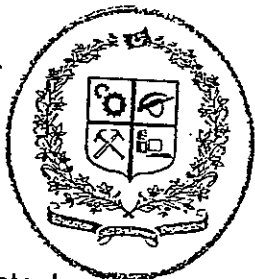
*Attested
Date*

*Final
Trade Testing
Council
Controller Examiner*

Issue Date



42



Skill Professional Trade Testing Council

Established under Education & Skill Development Organization

Act, XXI of 1960, Government of Punjab, Pakistan



Master log certificate No: 00010002776

Session: 2005- 2006

Roll No: 2911347

Handwritten signatures and scribbles on the left margin.

This is to Acknowledge That

Mr/Ms. Farhan Ullah Khan S/D of Mr. Ziarat Gul

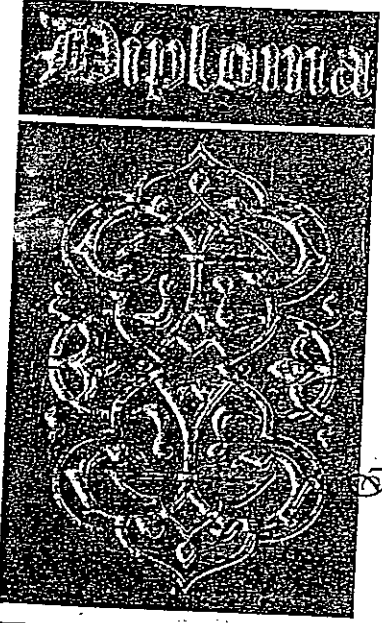
has successfully completed the prescribed
Course of study in

CERTIFIED TEACHER

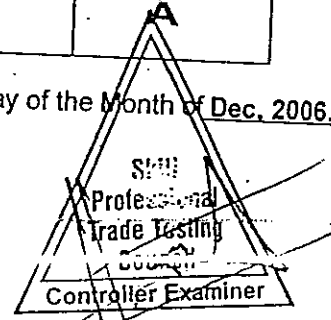
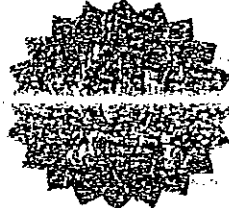
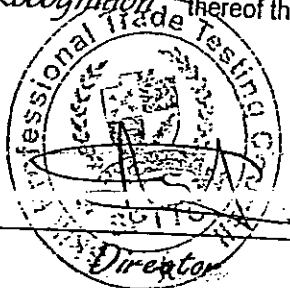
The test was conducted at:- *Khyber Institute of Management and Technology Peshawar.*

He/She showed the following competency in the test:-

Total Marks	Marks Obtained	Percentage	Grade
1500	1250	80%	A



In Recognition thereof this Diploma has been issued on the 18th Day of the Month of Dec, 2006.

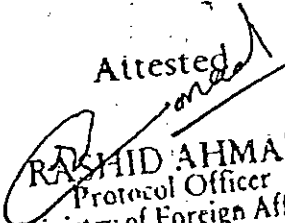


Handwritten signature of the Controller (Exams).

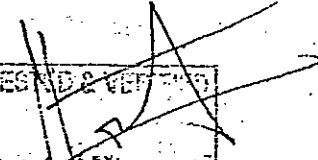
For more confirmation
please visit www.esdo.org.pk
or call head office on +92 423 6145224

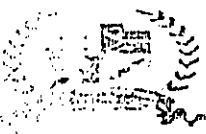

SHAH JEHAN
Office Manager
Regional Office
National Vocational & Technical
Training Commission Islamabad



Attested

RASHID AHMAD
Protocol Officer
Ministry of Foreign Affairs
Camp Office, Lahore.

Date.....
22 JUN 2017


ATTESSED & VERIFIED
CC: [unclear] [unclear]
Sd/- [unclear] [unclear]
[unclear]



Skill Professional Trade Testing Council

Established under Education & Skill Development Organization
Act XXI of 1960, Government of Punjab, Pakistan



Master log Certificate Number:		Submit
<p>Please enter Master log Number without (/)</p> <p>OR send your documents at info@esdo.org.pk (mailto:info@esdo.org.pk)</p>		

Student Name:	Farhan-Ullah Khan
Father's Name:	Ziarat Gul
Course Name:	Certified Teacher
Duration.:	2005-2006
Conducted at:	Khyber Institute of Management, Peshawar
ID Card Number:	17301-7013087-7
Roll No.	2911347

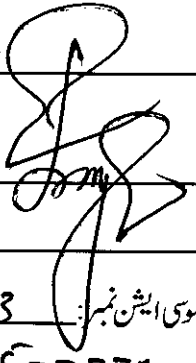


Verified

Attested by
ABC

214

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Alfred P
SAC

قیمت 50 روپے				44079
	ایڈوکیٹ:			
	بار کونسل ایسوسی ایشن نمبر:			
	رابطہ نمبر:			
	13-17-4213			
	0333-9577770			
				پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سردسبز ٹریبیونل پشاور خیبر پختونخوا

منجانب: Appelant فرحان اللہ خان ولد زیارت گل سکند سوڈنریہ بالا پشاور بنام سرکار وغیرہ	دعویٰ: سروس اپیل علت نمبر: مورخہ: جرم: تھانہ:
باعت تحریر آگہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام پشاور کیلئے **حیدر عمران اینڈ محمد عنبر رائے** جن ایڈووکیٹس کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 10/07/2018

بید _____ واہ شد _____ بید

کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی کوئی کاپی ناقابل قبول ہوگی۔

Accepted & Accepted
M. uzairullah Jan
Adv

M. Iqbal Sayi
Advocate
M. uzairullah Jan
Adv

Farhan ulah s/o Ziaurat Sul R/o Surizri Bala

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHW

SERVICE APPEAL NO.875/2018

Farhan Ullah Khan

V/S

Director (E &SE) & others

REPLY ON BEHALF OF RESPONDENTS.

Respectively Sheweth:

The Respondent submits below:

PRELIMINARY OBJECTIONS:

1. That the Appellant has got no cause of action /locus standi.
2. That the Appellant has concealed material facts from this Hon,ble Tribunal.
3. That the Appellant has been estopped by his own conduct to file the instant appeal before this Hon'ble Tribunal.
4. That the instant Appeal is badly time barred.
5. That the instant Appeal is not maintainable in its present form.
6. That the instant Appeal is bad for mis- joinder and non- joinder for the necessary parties.
7. That the Appellant has not come with clean hands to this Hon'ble Tribunal.
8. That the instant Appeal is barred by law.
9. That the Appellant does not fall within the ambit of aggrieved person.

ON FACTS.

1. That Para No.1 pertains to record and is subject to verification hence no comments.
2. That Para No.2 is incorrect and misleading the factual position regarding to the instant Para, however, remains that the CT certificate of the Appellant was found fake and bogus and the same was intimated by the concerned authorities.
3. That Para No.3 relates to the Appellant personal record, hence no comments.
4. That Para No.4 also pertains to record.
5. That reply to Para No.5, it is submitted that the Appellant applied for the said post through fake and bogus documents and got CT appointment order.
6. That Para No.6 is incorrect and misleading the Appellant produced fake and bogus documents/certificates and got illegally appointment order, furthermore, it was clearly mentioned in terms and condition of appointment order at S.No. 5 & 6 that "their service will be liable to termination/ reversion at any stage if their certificates/ degrees/ testimonials etc found fake/ bogus, their service will be considered as terminated automatically" Moreover, when academic documents of the Appellant were sent to the concerned quarters for verification where same were found fake and forged.

Certificates	Forged Certificates Marks	Original certificates Marks
Metric	613	478
F.A	775	531
C.T	Fake & Bogus	

Verification letter of F.A as Annex: A.

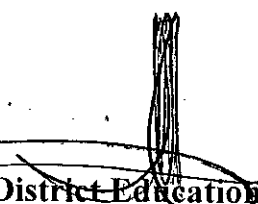
7. That Para No.7 is incorrect, misleading and against the facts. The Appellant not reinstated in service but once again the Appellant produce bogus order of his reinstatement and there is no entry of impugned reinstatement order on dated: 21-03-2011 in the issue register. **(The relevant pages of issue register dated 21-03-2011 are attached as Annex: B.)**
8. That Para No.8 is incorrect and denied. The Appellant has been dismissed form service on 01-03-2011. The transfer order produced by the Appellant bear fake/ bogus signature.
9. That Para No.9 is incorrect, misleading. Furthermore, the Respondent Department wrote letter vide Endst: No. 16366-68 dated 05-05-2016 to the Director Anti- Corruption KPK for starting criminal investigation against the Appellant in light of the inquiry report.**(Inquiry report and letter are attached as Annex: C & D)**
10. That Para No.10 is pertains to record.
11. That Para No.11 is incorrect and misleading, hence denied.
12. That in reply to Para No.12, it is submitted that the Appellant has no cause of action to knock the door of this Hon'ble Tribunal. It is pertinent to mentioned here that one Mr. Hashmat Ali also produced fake and bogus documents, and got illegal appointment order against CT post in the appointment order Endst No. 2137-2238 dated 04-05-2009 the Supreme Court of Pakistan kept intact his dismissal order. **(Order of Supreme Court is Attached as Annex: E)**

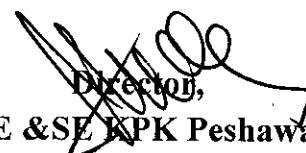
GROUNDS

- A. That Ground –A is incorrect and misleading. The Appellant was proceeded fake and bogus documents and after verification of documents the competent authority dismissed him on dated 01-03-2011 from his service.
- B. The Ground –B is also incorrect and misleading. The Appellant has been dismissed from service on 01-03-2011.
(Dismissal Order is attached as Annex: F)
- C. The Ground-C is incorrect. Detail reply has been given in the above Para.
- D. That Ground –D is also incorrect and misleading the detail reply has been discussed in the facts Para.
- E. That Ground-E is incorrect. The verification of the Appellant certificates has already annexed with the instant replay which were found fake and forged.
- F. That Ground –F is also incorrect and misleading. Detail reply has been given in Para No. 7 of the facts.
- G. That Ground –G is also incorrect and misleading. The Appellant was dismissed on 01-03-2011. The dismissal order of the Appellant has already annexed as Annexure F.
- H. That Ground-H relates to the Appellant personal record and also needs subject to verification hence no comments.
- I. That Ground-I is incorrect and misleading. Detail reply has been given in the above Para.

- J. That Ground-J is incorrect. The said rules are not applicable on the Appellant. Furthermore, the Respondents Department conducted the inquiry which is also annexed in Para No.9 of the facts as Annexure C.
- K. That Ground -K is incorrect. The Respondent have acted according to law and rules.
- L. That Ground -L is also incorrect and misleading. The Respondent Department sent the Appellant certificates to the concerned quarters for verification and his certificates were found fake, bogus and forged and he was dismissed on 01-03-2011, so he did not remain Govt: servant.
- M. That respondent also seeks leave of this Hon'ble Tribunal to present case law and to raise additional grounds at the time of arguments.

It is therefore, very humbly prayed that on acceptance of this reply, the instant appeal may very kindly be dismissed with cost.


District Education Officer
(Male) Peshawar


Director,
E & SE KPK Peshawar

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E. & S. EDUCATION) PESHAWAR.

APPOINTMENT

Consequent upon the Selection by the Departmental Selection Committee the following in-service/ Fresh (Male) candidates of District Peshawar are hereby appointed against the CT posts on regular basis (Non Pension-able) at the school noted against their each name in BPS (09) of the National Pay Scale (3820-230-10720) plus usual allowances as admissible under the rules on the following terms and conditions: -

75 % Batch Wise (Non Pension-able)

S. N	Name / Father Name of the Candidate	Year of passing CT Exam:	M. List No	Score	Posted at	Remarks
1	Wilayat Khan S/o Raza Khan	13/05/1996	1	39.08	GHS Kaga Wala Peshawar	Against Vacant Post
2	Al. Amir Irfan S/o Muhammad Irfan	25/05/1996	2	54.66	GHS Regi Peshawar	Against Vacant Post
3	Mujahid Khan S/o Raees Khan	30/08/1996	3	50.05	GHS Bada Ber Peshawar	Against Vacant Post
4	Fazal Hussain S/o Syed Pir Zaman Shah	31/12/1996	4	58.58	GHS Bada Ber Peshawar	Against Vacant Post
5	Jameel Shah S/o Bashir Shah	31/12/1996	5	42.57	GHS Regi Peshawar	Against Vacant Post
6	Zafar Iqbal S/o Ameer Badshah	13/05/1997	6	62.42	GHS P.K. Bala Peshawar	Against Vacant Post
7	Said Wali S/o Abdul Nabi	13/05/1997	7	59.83	GHSS Chaghar Matti Peshawar	Against Vacant Post
8	Mehfooz Ur Rehman S/o Manzoor Ur Rehman	13/05/1997	8	55.46	GHS Mian Gujar Peshawar	Against Vacant Post
9	Farooq Abdul Aziz S/o Abdul Aziz	13/05/1997	9	54.91	GHSS Adizai Peshawar	Against Vacant Post
10	Tehseenullah S/o Muhammad Zareen Khan	13/05/1997	10	54.75	GHS Shahi Bala Peshawar	Against Vacant Post
11	Kareem Ullah S/o Rizwanullah	13/05/1997	11	53.45	GHSS Chaghar Matti Peshawar	Against Vacant Post
12	Arshad Hussain S/o Waris Khan	13/05/1997	12	50.12	GHSS Adizai Peshawar	Against Vacant Post
13	S. Tauseef Hussain Shah S/o S. Noor Muhammad Shah	13/05/1997	13	47.89	GHSS Musazai Peshawar	Against Vacant Post
14	Mushtaq Ahmad S/o Said Badshah	13/05/1997	14	47.17	GHS Tela Band Peshawar	Against Vacant Post
15	Noor Ul Amin S/o Mir Ahmad Khan	13/05/1997	15	43.32	GHSS Adizai Peshawar	Against Vacant Post
16	Muqadar Khan S/o Ajab Khan	13/05/1997	16	42.62	GHS Ghari Sher Dad Peshawar	Against Vacant Post
17	Manzoor Ahmad S/o Noor Ahmad	10.07.1997	17	50.39	GHS Shaghali payan Peshawar	Against Vacant Post
18	Yousaf Khan S/o MURsaleen Khan	10.02.1998	18	47.29	GMS Qilla Shah Baig Peshawar	Against Vacant Post

5	Muhammad Ismail S/o Rizwanullah	31/12/2008	5	67.24	GMS Suleman Khel Peshawar	Against Vacant Post
6	Said Rahman Shah S/o Abdul Salam	20/03/2007	6	67.03	GHS Nak Band Peshawar	Against Vacant Post
7	Zia Ur Rehman S/o Said Raheem	31/12/2008	7	66.99	GHS Sheikhani Peshawar	Against Vacant Post
8	Muhammad Sohail S/o Muhammad Ayub	06/05/2004	8	65.74	GMS Passani Peshawar	Against Vacant Post
9	Faizanullah S/o Ziaurat Gul	13/05/2005	9	65.67	GHS Malmani Peshawar	Against Vacant Post
10	Ameen Bahader S/o Said Bahader	29/09/2008	10	65.12	GHS Azai Khel Peshawar	Against Vacant Post
11	Farhatullah S/o Amanullah	05/05/2005	11	65.27	GHS Nak Band Peshawar	Against Vacant Post
12	Saleem Ullah Khan S/o Amanullah Khan	30/12/2005	12	65.16	GHS Adizai Peshawar	Against Vacant Post

TERMS AND CONDITIONS.

1. They will be governed by such rules & regulation as may be prescribed by the Govt: from time to time for category of the Govt: servants to which they belong.
2. In case of resignation prior notice of one month should be given by the official / teacher concerned, other wise one month pay/allowances will be forfeited in lieu thereof.
3. Their seniority will be determined in accordance with the merit of Departmental Selection Board / Committee.
4. Their appointment are purely temporary and liable to termination / reverted at any stage with out assigning any notice / reason.
5. Their service will be liable to termination / reversion at any stage if their Certificates / Degrees NIC/ Domicile etc. testimonial found fake their services will be considered as terminated automatically and FIR will be lodged against them.
6. Their original Certificates / Degrees should be checked and verified from the concerned BISE / University etc before handing over the charge by the D.D.O concerned through the Executive District Officer (E&S) Education Peshawar.
7. Their declaration of assets should be obtained and kept in safe custody by the D.D.O concerned.
8. They should take over charge of their posts with in one month after the issue of this notification / order.
9. Charge report should be submitted to all concerned.
10. TA/DA is not allowed to all Candidates.
11. The above selection has been made on the following criteria: -
Obtained marks Multiplied by Allocated Marks to Certificate / Degree and divided by Total Marks: e.g. 680x25/850 = 20

Allocation Marks.

SSC	25
FA/Sc	25
BA/BSe	10
MA/MSe	10
Professional	25
Experience	05 (1 year=2 Marks / 2years = 3 Marks/ 3 years & above = 5Marks)

G:\App\ Order 09.doc

Attested

[Signature]

HEAD MASTER
G.M.S Asia Park
Peshawar

(C)

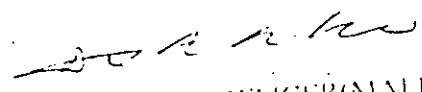
12. Their service will be liable to termination, if they tried for transfer before completion their tenure (i.e. 3 years).

Note: Charge will not be handed over until the verification of their appointment order.

(SAID RAHMAN)
EXECUTIVE DISTRICT OFFICER
(E & S) EDUCATION PESHAWAR

Inst. No. 2137-2238 Date 04/05/09

- 1. Copy of the above is forwarded for information and necessary action to the:-
- 1. P.S to Minister for Education SWFP Peshawar.
- 2. P.S to Secretary (E&S) Education Govt of SWFP Peshawar.
- 3. P.S to Director (E&S) Education SWFP Peshawar.
- 4. District Accounts Officer Peshawar with the request that the bills of the above named candidates may not be honoured till the verification of their Certificates/ Degrees etc. from the concerned agencies duly authenticated by this office.
- 5. P.S.O to District Nawim City District Govt Peshawar.
- 6. P.S to District Coordination Officer City District Govt Peshawar.
- 7. District Officer (Male) (E&S) Education Peshawar.
- 8. S. Principals / Head Master concerned with the remarks that
 - (i) Charger report should submit along with original fee receipt for each degree certificate in duplicate for the purpose of verification to this office
 - (ii) All Candidates concerned.
- 9. ADO Establishment ADO Accounts Superintendent Establishment Branch
- 10. Cashier local office


DISTRICT OFFICER (MALE)
(E & S) EDUCATION PESHAWAR



(14)

378

مردانہ / زنانہ

درخواست برائے آسامی سی ٹی

خصوصی نوٹ

حکومت صوبہ سرحد کے نوٹیفیکیشن کی تریسی ایکٹ مورخہ 23 جولائی 2005ء کے تحت تمام تقرریاں ریگولر گریڈ پر پیش کی بنیاد پر ہوگی خواہ امیدوار پہلے سے کسی بھی مستقل پوسٹ پر کام کر رہا رہی ہو۔ جی پی فنڈ کی جگہ سی پی فنڈ کی کوئی ہوگی۔

فارم نمبر / رول نمبر 0719

یونین کونسل

فرمان اللہ خان

ولدیت زارت گل

علقہ پی ایف

تاریخ پیدائش 15 جنوری 2009ء کو عمر سال 25 ماہ 10 دن 15

ضلع ڈوبساں (ش) کیڈیٹرز ذوقی شناختی کارڈ نمبر 7-7087013-701-17301

مستقل پتہ محلہ منصور خیل سہول پورہ ہلال "خان" سہول پورہ ہلال کھنڈر ضلع لنگاہ عارضی پتہ

تعلیمی قابلیت

نمبر شمار	امتحان	رول نمبر	پاس کرنے کی تاریخ	کل نمبر	حاصل کردہ نمبر	ڈویژن	یونین / ایجنسی
1	میٹرک	22486	2000	850	613	فرسٹ	یشاد (ہرز)
2	ایف اے / ایف ایس سی	53896	2002	1100	775	فرسٹ	یشاد (ہرز)
3	بی اے / بی ایس سی	82265	2004	550	375	فرسٹ	یشاد (ہرز)
4	ایم اے / ایم ایس سی	7083	2005	1100	754	فرسٹ	یشاد (ہرز)
5	سی ٹی / ڈی ایم / جے ڈی بی ای	1534	2005	1200	785	فرسٹ	یشاد (ہرز)
6	قرأت / تجوید القرآن						
7	حفظ القرآن						

دستخط امیدوار

تعلیم میں مستقل ملازمت کی صورت میں درخواست فارم کے ساتھ پے رول کی تصدیق شدہ نقل افسر مجاز کی زیر دستخطی جمع کرنا ضروری ہے۔

15 جنوری 2009ء بوقت 2.30 بجے بعد از دوپہر دفتری اوقات کار تک فارم جمع کرنا ضروری ہے اسکے بعد کوئی فارم وصول نہیں کیا جائے گا۔ تجربہ مخصوص آسامی کے لئے پیشہ ورانہ قابلیت (سی ٹی، ڈی ایم، بی ای، بی اے، تجوید القرآن) امتحان کا نتیجہ نکلنے کے بعد شمار کیا جائے گا۔

پرائمری سکول کی صورت میں

دستخط اے، ڈی، او، سرکل

مہر

مہر

پرنسپل / ہیڈ اسٹا

(7)

6976 Dated 2/5/2010.

To,

The Secretary,
BISE, Peshawar.

~~Asst Secy~~

Subject:- VERIFICATION OF CERTIFICATES OF DISTRICTS

Memo:-

Enclosed please find herewith the photocopies of Certificates / Degrees in respect of the following C.T. as per detail given below for further necessary action and returned as soon as possible..

S.No.	Name of Teacher.	Name of Examination	Roll No	Opting Marks	Remarks
1.	Hishmat Ali S/O Abdul Subhan	SSC	15408	665	1992
2.	-----do-----	F.Sc	2241	775	1994
3.	Farhanullah Khan S/O Ziarat Gul	SSC	22486	613	2000
4	-----do-----	F.A	53896	775	2002

S. Mulla

District Officer (A. file)
(F.S.S) Education Peshawar

Letter no 1706 dt. 6.9.10

To,

EDO
FPSE
Peshawar

SSS

Subjects: verification SSS

Your letter no 6976 dated 2/9/10

1. Both the certificates are false/forged as per records & details are as under:-

- a. 15408 A/1992 Hishmat Ali obtained mark 665
- b. 22486 A/2000 Farhanullah Khan obtained mark 613

2. Return (as desired) P.K.M.

M. Mulla
Asst Secretary Certificate (S.S.)
Board of Inter & Secondary
Education Peshawar.

(PTC)

6976

Letter no 99540

Date - 06-09-2010

To,

EDC
EFSE
Peshawar

Subject: Verification of HSSC (Certificates)

Yours letter no 6976 of 2.9.10

1. Both the certificates are false/fake as per our records. Details are as under

- a. 2241 R/94 Hasmat Ali roll no 2241
- b. 53896 R/02 Faha Wali roll no 53896

Yours sincerely,
M. M. W. A. L.

M. M. W. A. L.
Assistant Secretary
(Certificates)
B.I.S.E Peshawar

for C. P. S.

S.No. 125580

Roll No. 22486

REVISED



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan

Secondary School Certificate Examination
SESSION 2000 - ANNUAL
(Science Group)

This is to Certify that Farhan Ullah Khan Son / Daughter of Ziarat Gul
and a student of Khalil Mohmand School & College, Badaber, Peshawar has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in March/April, 2000 as a Regular
candidate. He / She obtained 478 Marks out of 850 and has been placed in Grade C Representing Good

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|----------------|--------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Chemistry |
| 2. Urdu | 4. Pakistan Studies | 6. Physics | 8. Biology |

He / She has been awarded Grade C on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form February 15, 1985

Issued in lieu of O.C# 105090 (Annual - 2000)

Asslt Secretary

PRINCIPAL
Govt. High School

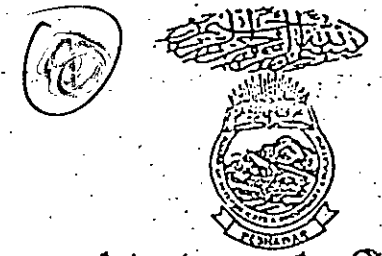
Secretary

Matron

Matron Certificate is issued without alteration or erasure.

S.No. 115-

Roll No. 22486



Board of Intermediate and Secondary Education Peshawar N.W.F.P. Pakistan Secondary School Certificate Examination

SESSION 2000 -Annual
(Humanities Group)

This is to Certify that Farhan Ullah Khan Son / Daughter of Ziara Gul

and a student of Peshawar District has passed the Secondary School Certificate

Examination of the Board of Intermediate and Secondary Education, Peshawar held in March./April, 2000 as a Private

candidate. He / She obtained 613 Marks out of 850 and has been placed in Grade A Representing Excellent

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|----------------|--------------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Islamic Studies |
| 2. Urdu | 4. Pakistan Studies | 6. G. Science | 8. Art |

He / She has been awarded Grade A on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form February 15, 1985

[Signature]
Asst. Secretary

[Signature]
Secretary

[Signature]
PRINCIPAL
GHS Surtai Bala Pesh.

This certificate is issued without alteration or erasure.

Handwritten text: AND

Handwritten text: EXCELLENT

S.No. 115021

Roll no: 58822

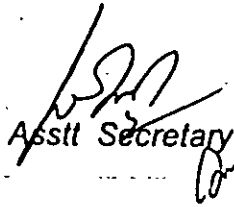
Group. Pre-Engineering

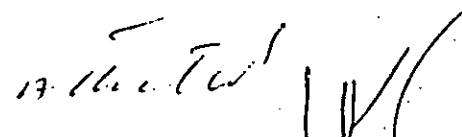


Amc-1 P-11

Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION
SESSION 2002-ANNUAL

This is to Certify that Farhan Ullah Khan Son of Ziara Gul
and a student of Govt. College Badber Peshawar Registered No. 20-B/BDR-2000
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May, 2002 as a Regular Candidate. He obtained 531 Marks out of 1100
and has been placed in Grade D Representing Fair. He has been awarded Grade D on the
basis of internal assessment by the institution concerned. The Examination was taken as a whole.


Asstt Secretary


PRINCIPAL
Govt. High School
Mardan Peshawar


Secretary

This certificate is issued without alteration or erasure.

S.No. 16589

Roll No. 53896

Group. Humanities

Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION
SESSION 2002 ANNUAL

This is to Certify that Farhan Ullah Khan Son/Daughter of Ziarat Gul
and a student of District Peshawar Registration No. 12-B/HSC-2000
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May, 2002 as a Private Candidate. He/She obtained 775 Marks out of 1100
and has been placed in Grade A Representing Excellent He/She has been awarded Grade A on the
basis of internal assessment by the institution concerned. The Examination was taken as a whole.

Asst Secretary

Secretary

This certificate is issued without alteration or erasure.

Annex (A)

P-12

P-13

(3)

Office of the A-stt;Director
Examination At PITE Larama Peshawar.
No. 4793 ,Dated. 20/9.2010.

To,
The Executive District Officer,
(E&SE)Peshawar.

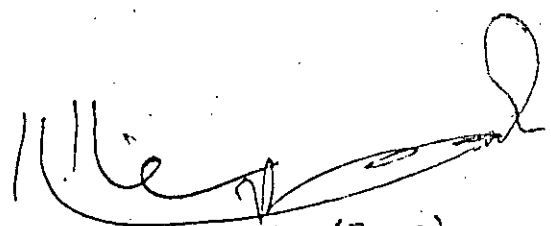
Subject:- Verification Of Certificate Degree.

Memo,
Reference your letter No. 7053 dated 6.9.2010 on the subject cited
above.

It is submitted that according to the record of this Office the CT
certificate of the following CT candidates are FAKE & BOGUS.

Neither the candidates appeared in the Examination held in 2004-05
Nor the Certificates are correct.

S.NO.	Name of Teacher
1.	Hashmat Ali S.O Abdul Subhan.
2.	Farhanullah Khan S.o Ziarat Gul.



Assistant Director, (Exam:)
At PITE Larama K.P.K. Peshawar.

SCHOOLS & LITERACY DEPARTMENT, NWFP, PESHAWAR

Serial No. 2752

Session 2004-2005

Roll No. 1539

Marks Obtained: 785/1200

Division First

Certified that Mr./Mrs./Miss Farhan Ullah Khan

Son/Daughter of Ziarat Gul is a student of

GEC (M) Gulbahar Peshawar

having passed the C.T. Examination held in 12/11/2004 is

qualified to teach in Middle/High School of Schools & Literacy Department.

Prepared by

Checked by

Date of declaration Result 13/05/2005

Date of Issue 22/05/2005

Deputy Director (Examination)
Schools & Literacy Department,
N.W.F.P., Peshawar.

C

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93

part

Handwritten signature/initials



21/3/11

D-15
GK 55 NWFP 488 FS-5000 Reg. of 200 L

REGISTER OF ISSUES

Serial No.	Branch	Inward Register Daily or General No.	To whom and number of enclosures	Subject or File No.	Remarks (record reference amount or stamps, etc.)	Stamp V. (Rs.)
2639-43	AF 0116		DAO Post: MISS 10 2's supdct: local office Cash: 28 File	Retirement / Pension --- --- ---	(Ed. stamp) ET - TICK 96	
2644-46	P84 723		DAO Post: DY: 00 (F) File	Grant of leave --- ---	(Ed. stamp) - 100	
2647-49	744		DAO Post: DY: 00 (F) File	--- ---	(Ed. stamp) - 4/25 PSI (Ed. stamp)	
2650	521		DY: 00 (F)	Applic: for C-10	leave (Ed. stamp) 50 RS PSI	

2651	P83 731		DY: 00 (F)	21-3/11 Grant of		
------	------------	--	------------	---------------------	--	--

CL 10
P-16

2651 PLS 21-3/11 Grant of Bill possible - 2/2/25
3/13

2652-56 PLS DA @ PSL: SUSPENSION P&T PLS 10
2/1/00 DA @ (M) 2/25/00 2/15

MIT EPS DISCUSS
T/E

2657 PLS PPS 04: 00 (M) WP 280/0/0/0 - B-5 Dec 13-07
2/1/00

2658 W-DIE D. ERS/IE Request for Transfer P&T - amount
SMS ~~transfer~~ GET 2/1/00 MITC
2/1/00

2659-2958 PLS 2959-61 copy 2/00 stress 2959/2958/2957 in P&T DIST / 4/13/00 USE / BARTIS & SATTI
S.O.D (A.B.S) ERS/IE send in P&T with
D. ERS/IE

PD De EDG

2962 PLS 2963 2964 2965 2966 2967 2968 2969 2970 2971 2972 2973 2974 2975 2976 2977 2978 2979 2980 2981 2982 2983 2984 2985 2986 2987 2988 2989 2990 2991 2992 2993 2994 2995 2996 2997 2998 2999 3000

RS/IE MIT 2962-2964 2965-2967 2968-2970 2971-2973 2974-2976 2977-2979 2980-2982 2983-2985 2986-2988 2989-2991 2992-2994 2995-2997 2998-2999 3000

MIT 2962-2964 2965-2967 2968-2970 2971-2973 2974-2976 2977-2979 2980-2982 2983-2985 2986-2988 2989-2991 2992-2994 2995-2997 2998-2999 3000

2962-2964 2965-2967 2968-2970 2971-2973 2974-2976 2977-2979 2980-2982 2983-2985 2986-2988 2989-2991 2992-2994 2995-2997 2998-2999 3000

(B) 21/3/11

REGISTER OF ISSUES

Serial No.	Branch	Inward Register Daily or General No.	To whom and number of enclosures	Subject or File No.	Remarks (record reference amount or stamps, etc.)	Stamp Value (Rs.)
2964	1/1/11		S.O (B&A) ISS/E		Request for sanction of Post of Conceptual Operator N/A in 300 local rule file (L.C.S.) in M.P.D.	
2965	WAF		D. ESS/E M.P.D.		Family Pension Case # 5715 (3)	
2966	SIB		D. ESS/E		APPL: for financial assistance	
2967	WAF		DLK - GASS Under		--- GASS Under ET-DR-113	
2968	WAF		Account file for Muhammad / H/O Muhammad Rida		Recommendation / preparation of Pension Certificate SPS 15/10/11 PSE 15/10/11	
2969-71	WAF		DAO Pesh.		--- Grant of leave 30/11/11 - 5/12/11 --- (Ed: S/Bak) "c" 30/11/11	

21/3/11

2972	1/1/11		DAO Pesh.		Regular Sanction Transfer Admission entry: PS: 10036/-	
------	--------	--	-----------	--	---	--

2969-21 PRY 455 DAO Post. (4) Standard of Living Q41 5925
 FY: 00 FY 5 Calif/Book 11 Q41

2972 PRY 455 DAO Post. 21/3/11. Personal Savings Travel
Admission - 100.36/-

2973 PRY 455 DAO Post. 22/3/11. Personal Travel
Admission - 100.36/-

2974 PRY 455 DAO Post. Personal Travel
Admission - 100.36/-

2975 PRY 455 DAO Post. Personal Travel
Admission - 100.36/-

2980-32 PRY 455 DAO Post. Personal Travel
Admission - 100.36/-

2983-90 PRY 455 DAO Post. Personal Travel
Admission - 100.36/-

3455 13 SD (Admission 100.36/-)

100.36/-

20
22/3/11

P-19

REGISTER OF ISSUES

Serial No.	Branch	Inward Register Daily or General No.	To whom and number of enclosures	Subject or File No.	Remarks (record reference amount or stamps, etc.)	Stamp Value (Rs.)
2991-3023		151	SHS/SHS (MSF)	Accounting	Monthly Receipt	17 P; 5000
3024-28		copy	D. Fes/ie			
			EDO (P&D) Dist.			
			DO (Finance)			
			DO (P) Fes/ie			
			PAEO EDO			
3029-31		184 2100	DAO Dist.	Retirement / Pension		PSC 1/2
			Dy: DO (M)			3 P 215/1
			T/E			(1/2/2011)
3032		P&D	jo khoris lu gah	PP 10	change sheet	
3033-34		copy	copy: Fes/ie			(1/2/2011)
			pls do copy			
3035		B	DCO Dist.	App: for financial		150: 9/16 00060

3038-34

any

See 4: 12/11
pls see 12/11

12/3/11

Philippine
History

3035

SB Deco Post

APPL: for Renewal charges
ADD: 19/11

3036-39

UOE
D/E

rel Recs Rec

allc order adjustment

STAMP & EX-ADO
12/11

3040

UOE
H/M - SHS (UOE) L's

P.D.O. AUTHORITY: 12/11
(12/11)

3041

UOE
OY: D O (M)

SPD: 12/11
PSI: 12/11

3042

UOE
O A

12/11
PSI: 12/11

3043

UOE
O A

12/11
PSI: 12/11

3044

UOE
O A

12/11
PSI: 12/11

3045

UOE
O A

12/11
PSI: 12/11

3046

UOE
O A

12/11
PSI: 12/11

Annexure - B



P-21

Ann - G7

District Education Officer
(Male) Peshawar

No. 1071

Dated: 14/11 / 2016

The Accountant General
Khyber Pakhtunkhwa Peshawar

Subject: - PUNCHING OF WRONG SALARY IN R/O FARHANULLAH CT FOR THE MONTH OF 10/2015

Memo:

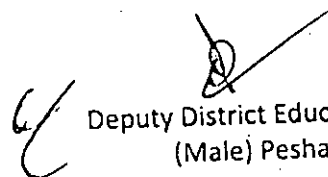
It is submitted that while checking the record/salary of PW 6017 during the month of 10/2015, it was pointed out that a salary in r/o Mr. Farhanullah CT bearing Personal No. 307279 wrongly punched against PW 6017 transferred to HBL City Branch on A/C No. 7900162303.

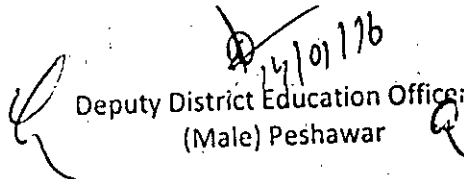
The said change / source was neither submitted by this office nor we know the above Official. It is also mentioned that the arrear in r/o of the above official also punched by your office during the month of 12/2015.

You are therefore requested that the pay of above official may be stopped and enquired the case on your own level and stopped this practice in future.

Endst. No. 1072 dated 14/11 / 2016

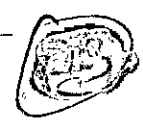
Copy forwarded to Manager HBL City Branch with the request that payment may not be made to Mr. Farhanullah bearing A/C No. 7900162303.


Deputy District Education Officer
(Male) Peshawar


Deputy District Education Officer
(Male) Peshawar

Annex - (C)

P-22



Ann - (E)



OFFICE OF THE PRINCIPAL GOVT TECHNICAL HIGHER SECONDARY SCHOOL GUL BAHAR PESHAWAR CITY.

INQUIRY REPORT REGARDING ILLEGAL DRAWAL OF SALARY IN R/O

(1) Mr FARHANULLAH KHAN CT GMS GARHI FAZAL RAHIM PESHAWAR.

(2) MR IFTIKHAR HUSSAIN DM.

In compliance to DEO(M) (E&SE) Peshawar Endst NO.1073-81 dated Peshawar the 14/01/2016, the inquiry committee comprising of:

- 1. Mr Majid Sabir Principal GTHSS Gul Bahar Peshawar City (Chairman)
- 2. Mr Alamgir Khan Principal GCMHS Peshawar Cantt (Member)
- 3. Mr Shabeer Ahmad V/Principal GSHSHSS Peshawar City (Member)

Conducted a detailed inquiry whose report is as follows :

1. History of the case :-

The account branch at DEO (M) E&SE Peshawar while checking the salary record for the month of 12/2015 pointed out that fake salary has been drawn in r/o Mr.Iftikhar Hussain DM bearing personal no.00753557. The DEO(M) E&SE Peshawar in a letter addressed to the AG Khyber pakhtun khwa Peshawar bearing No.185 date 5/7/2016, submitted that the monthly change/source-1 in r/o Mr.iftikhar hussain DM has neither been submitted nor signed by DDEO(M) Peshawar who is the DDO for the office of DEO(M) Peshawar and all the boys Middle Schools in district Peshawar.

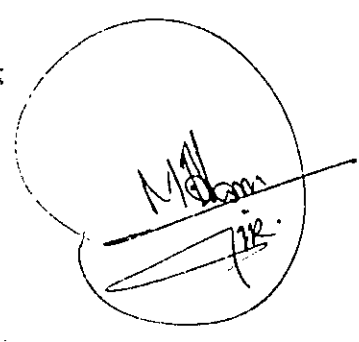
vide Annexure - A.

In another similar case the concerned account branch at DEO(M) E&SE Peshawar while checking the salary record of PW 6017 for the month of October 2015, pointed out that Mr.Farhanullah CT bearing personal No.307279 has wrongly and fraudulently drawn salary against PW 6017 and the salary has been transferred to HBL City Branch on A/C No.7900162303. The concerned section reported the case to the high ups at District level and the DEO(M) E&SE Peshawar in a letter to the Accountant General KP Peshawar, bearing No.1071 Dated 14/01/2016 submitted that the drawl of salary in r/o Mr. Farhanullah CT against PW 6017 was illegal .The letter further stated that the said change/source was neither submitted by DEO(M) office nor they know the said official. Similarly the arrear in r/o Mr.Farhanullah CT punched by AG office during the month of December 2015 is also wrong. The AG has also been requested in the above mentioned order to immediately stop the salary in r/o Mr.Farhanullah CT. vide Annexure-B.

The inquiry committee visited the office of DEO(M) Peshawar and discussed both the cases in details with the concerned officials and officers .The inquiry committee also examined the available record thoroughly .The committee also visited GMS Fazle Raheem Peshawar to enquire about the whereabouts of Mr.Farhanullah (CT).

Signature
12/03/16

PRINCIPAL
G.T.H.S.S Gulbahar
Peshawar.





In the light of all the discussions with the concerned officers and officials and the available record the inquiry committee has been able to reach to the following conclusions :

2. Findings:

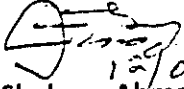
- I. No record regarding Mr.iftikhar Hussain DM is available at DEO(M) Peshawar .His where about are not traceable .His drawl of salary in the month of 12/2015 is totally illegal.
- II. Mr.iftikhar Hussain DM has drawn his salary fraudulently in collusion like the officials of AG office Peshawar.
- III. Mr.Farhanullah S/O Ziarat Gul appointed as CT on 4/05/2009 was dismissed from service for producing forged attested copies of documents for recruitment, vide DEO(E&SE) Deptt Peshawar Endst.No 1417-25 Dated 01/03/2011. (Vide Annexure -C)
- IV. Mr.Iftikhar Hussain(DM) and Mr.Farhanullah (CT) are not Govt servants and hence their drawl of Salary from AG office is an illegal and fraudulent act.
- V. All the appointment and transfer orders in both the cases are bogus and invalid .

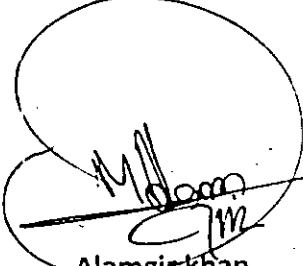
3. Recommendation :

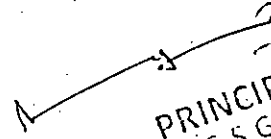
- (I) An FIR may be lodged against Mr.Iftikhar Hussain DM and Mr.Farhanullah CT for the production of fake documents and illegal drawl of salaries from national exchequer.
- (II) The case may also be referred to Anti Corruption Deptt in order to unearth the mafia behind such crimes .

Enclosed:

Annexure A,B,& C.


 12/03/18
 Shabeer Ahmad
 Vice principal
 GSHSHS No1
 pesh city.


 Alamgir Khan
 Principal
 GCMHS Pesh canth.


 Dr.Majid Sabir
 Principal (chairman)
 GTHSS Gulbahar.

PRINCIPAL
 T.H.S.S Gulbahar
 Peshawar.

Annex - (D)

P-24

DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR.

No: 1626 Dated 5/5 /2016.

To

The Director Anti-Corruption
Khyber Pakhtunkhwa Peshawar.

Subject: CRIMINAL INVESTIGATION
Memo:

I am directed to enclose herewith an inquiry report in r/o Mr. Iftikhar Hussain (Ghost) Drawing Master and Mr. Farhanullah (Ghost) C.T submitted by the inquiry committee comprising of Mr. Majid Sabir Principal GTHSS Gul Bahar Peshawar as Chairman, Mr. Alamgir Khan Principal GCMHS Peshawar Cantt. and Mr. Shabir Ahmad Vice Principal GSHSHSS No:01 Peshawar City. Notified vide this office Endst: No:1073-81 dated 14-01-2016 for criminal investigation in light of the recommendation of the committee please.

Encl: As above.

Endst: No: 1626-68

DY: DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR.

Copy of the above forwarded for information to the:

- 1- PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2- Deputy Commissioner Peshawar.
- 3- Accountant General Khyber Pakhtunkhwa Peshawar.

DY: DISTRICT EDUCATION OFFICER
(MALE) PESHAWAR.

IN THE SUPREME COURT OF PAKISTAN
(Appellate Jurisdiction)

Present:

Mr. Justice Musfir Alam
Mr. Justice Maqbool Baqar

Civil Petition No.243-P of 2016

Against the judgment dated 09.02.2016 passed by the
KP Service Tribunal, Peshawar in Appeal No.1282/2011.

Government of K.P. through Secretary
Elementary & Secondary Education
Department, Peshawar and others

Petitioner(s)

VERSUS

Hashmat Ali and another

Respondent(s)

For the Petitioner(s):

Barister Qasim V adood, Addl. AG KP

For the Respondent No.1:

Mr.Abdul Hameed , ASC

For the Respondent No.2:

Abid Munir, AAO KP

Date of Hearing:

19.01.2018

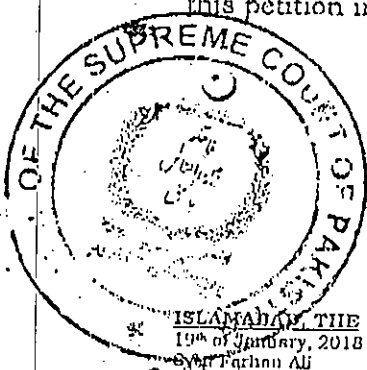
ORDER

Mushir Alam, J:- Petitioner through the Secretary, Elementary & Secondary Education Department, Peshawar has impugned the order dated 09.02.2016 passed by the learned KP Service Tribunal, Peshawar whereby appeal filed by the respondent Hashmat Ali was allowed who was directed to be reinstated.

2. Brief facts appear to be that petitioner was originally appointed as primary school teacher in the year 2007 in the Govt. Primary School Ghari Hamza, Peshawar. It appears that on advertisement of vacancies as CT Post petitioner applied alongwith documents. He having earned the required bench mark was consequently appointed. It was, *inter alia*, provided in the appointment letter that in case his documents are found forged and or false proceedings would be initiated. It appears that the petitioner furnished documents alongwith his hand filled application which shows marks secured from SSC to

Graduation in his handwriting, thus documents furnished available at page 55 onward were verified to be fake and bogus and after show cause notice through impugned order dated 01.03.2011 he was dismissed from service which action was challenged before the competent authority and was maintained so also which was challenged before the Service Tribunal, Peshawar. The Tribunal in consideration of the fact that no inquiry where major penalty was imposed was carried out.

3. Learned counsel for the respondent alongwith respondent who appeared in person when confronted did not controvert the stance taken by the petitioner and he was specifically asked if all documents are found fake and or forged the matter may be referred for criminal prosecution, he does not contest. In this view of the matter in case where inquiries based on authenticated record and documents which are not disputed and or denied there is no need to carry out regular inquiry as has been held by the learned Tribunal. Accordingly, we would convert this petition into appeal and allowed the same.



23/1/18

Att- Mashir Akram J
Att- Nazimul Haq Buzdar J

Certified to be True Copy

Court Associate
Supreme Court of Pakistan
Islamabad

U-51

1653/18
Date of filing 19/01/18
No. of pages 600
No. of fees 6
500

155

Amma (R)

11-168

(Amma)

(R)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S. EDUCATION) PESHAWAR
OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S. EDUCATION) PESHAWAR

OFFICE ORDER:-

1. WHEREAS Farhanullah S/O Ziarat Gul CT GRS. Mattani Peshawar for producing forged attested copies of documents for recruitment as CT teacher was proceeded against under the NWFP Removal from Service (Special Powers) Ordinance, 2000 and where as the accused official was directed vide this office Memo No.6019 dated 23/8/2010 to explain the serious irregularity.

2. AND WHEREAS Show cause Notice was served upon the accused through Principal vide this office Memo:No.1546 dated 10/11/2010, but his reply was found unsatisfactory

3. AND WHEREAS The accused official did not appear before the competent authority for personal hearing. The competent authority is of the view that charges of forged documents have become proved against the accused official.

4. NOW, THEREFORE, in exercise of the powers conferred under section Khyber Pakhtun Khwa; Removal from Service (Special Powers) Ordinance, 2000, the Competent Authority (Executive District Officer (E&SE), Peshawar) is pleased to impose major penalty of "Dismissal from Service" upon Mr. Farhanullah S/O. Ziarat Gul CT GRS. Mattani Peshawar from the date of appointment as CT, i.e 04/5/2009. The unauthorized salary drawn by him may be recovered and deposited in to Govt. treasury and the copy of Chelan be provided to this office


(JAMIL UR REHMAN)
EXECUTIVE DISTRICT OFFICER
(E & S.) EDUCATION) PESHAWAR

Encl: No. 1417-25 / Dated 01/03/2011

Copy forwarded to the:-

- 15. District Accounts Officer Peshawar.
- 16. P.S to Minister for Elementary & Secondary Education Khyber Pakhtun Khwa Peshawar.
- 17. P.S to Secretary (E & S. Education) Deptt: Govt: of NWFP.
- 18. Director (E & S. Education) Khyber Pakhtun Khwa Peshawar.
- 19. District Coordination Officer City District Govt: Peshawar.
- 20. Principal GHS, Mattani Peshawar with the direction that recovery from 04/5/2009 till stoppage of pay should be recovered from the teacher concerned..
- 21. Official Concerned

00


EXECUTIVE DISTRICT OFFICER
(E & S.) EDUCATION) PESHAWAR

FAZAL DANI

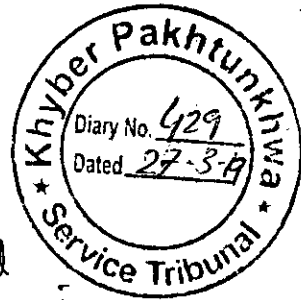
Before the Hon'ble Service Tribunal K-P Peshawar

Farhan Ullah vs Gout etc

Next Date.
30-5-2018

Subject: Application for early hearing

Appeal No 875/2018



Respectfully Sheweth:


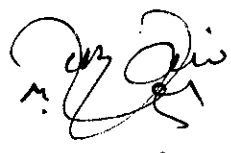
Be accelerated
to 03/05/18. Notice.

- 1/ That the above titled case is pending adjudication before this Hon'ble Tribunal and is fixed for 30/05/2018.
Retard on original file. Forwarded 27/3/18
- 2/ That in the above titled case, the salary of the appellant is stopped since December 2015, the instant/titled appeal has been filed and the comments/reply of the respondents have already been received.
- 3/ That the appellant is a poor man having family and due to stoppage of salary, he and his family has been facing great problems.
- 4/ That if the titled appeal is not fixed at earliest date, the appellant and his family would be further burdened with

Serials issues.

It is, therefore, most humbly prayed that on acceptance of this early hearing application the above titled case may kindly be fixed at earliest.

27/03/2019

Appellant
Through 
Mian Muhammad Imran
AHC 
Muhammad Uzairullah Jan